

**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 STEPHEN FOSTER CLOSE**

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

1. I am the UK Security Manager for Uniper Energy. I was formerly a police officer for Greater Manchester Police and then Hampshire Constabulary, as well as a Security Advisor and Investigation Officer for National Grid. In my current role I am responsible for supporting the security of the Claimant's people and assets within the United Kingdom.
2. I make this witness statement in support of the Claimant's application for an injunction to prevent both (i) travellers and (ii) so-called 'urban explorers' from

trespassing and/or causing a private nuisance at the Ratcliffe-on-Soar power station, which is located to the south-west of Nottingham. 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 Andrew James Skelton 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.
6. There is now shown to me a bundle of documents, which I exhibit as "**SC1**". I confirm that the documents in those exhibits are true copies of the documents. References in this witness statement to the page numbers in SC1 are in the format **SC1/x**.

#### **Ratcliffe-on-Soar power station**

7. The Ratcliffe-on-Soar power station (the "**Power Station**") was the UK's last coal-fired power station and operated for over 50 years until it was permanently shut down on 30 September 2024. The Power Station is currently undergoing decommissioning, which is expected to last around two years, after which it will be demolished and the site redeveloped. As the shutting down of the Power Station marked the end of over 140 years of coal-fired generation in the UK, it was well-publicised. I exhibit a news article published about this at **SC1/6-9**.
8. The Power Station encompasses eight concrete cooling towers which stand at a height of 114 m, as well as a main chimney stack that is 198 m in height. The Power Station also encompasses coal-fired boilers, turbine and generator sets, exhaust gas and water treatment facilities, coal storage and transportation facilities, electricity transformers and administrative offices. On the Power Station site there is also an office building called the 'Technology Centre', which supports the Claimant's wider UK business and will continue to do so after the Power Station is decommissioned. There is also a major 400kV and 132kV National Grid substation of importance to the local power grid. The substation itself does not form part of the area over which an injunction is sought, as explained in the witness statement of

Graeme James Robertson, but I mention this because it poses a risk to those who unlawfully enter the Power Station site. The Power Station site is approximately 280 hectares in area and is surrounded by a perimeter fence of approximately 5 km in length. I exhibit a photograph and an aerial image of the Power Station at **SC1/10 and 11**.

9. There are a large number of risks and hazards on the Power Station site. These include: structural instability from buildings and structures in various stages of demolition and the resultant risk of collapse or falling debris; risk of shock or fire from interfering with electrical wiring; exposure to hazardous materials including asbestos, lead, chemical substances and contaminated soil or water; suffocation or entrapment in confined spaces; risk of falling from height or down open pits and holes and risk of injury from moving heavy machinery and vehicles. Only individuals authorised by the Claimant (e.g. employees and contractors) are permitted on site and all those that are so permitted have undergone an induction that alerts them to risks on site and ways of mitigating and responding to them.
10. I am aware from discussions with the Site Manager of the Power Station that, now the site is in decommissioning, there are on average around 200 total employees and contractors on site at any given time, including the Claimant's contracted security personnel.

#### **Threat to the Power Station from travellers**

11. The Claimant is seeking an injunction to prevent travellers from entering the site following two recent incursions at the Power Station, the former of which involved violence against security personnel, caused significant damage to the site and put the travellers at serious risk of injury and potentially death. The fact that there has been a second serious attempt to enter the site, again involving forceful means and only a short period of time after the first incursion, has led the Claimant to conclude that the risk is high of future similar attempts and that it is therefore necessary to seek an injunction.
12. I set out as follows a summary of the two recent incursions at the Power Station and go on to provide information regarding other recent similar incidents of which I am aware.

#### April 2025 incident

13. On the evening of Friday 25 April 2025, a group of around 30 travellers forced entry to the Power Station site with vehicles and caravans. They established a camp and remained on site until Monday 28 April 2025, when they left following actions by enforcement officers instructed by the Claimant, supported by a significant police presence.
14. I am aware of the following information regarding this incident from internal reports from colleagues within the Claimant during and after the event and from reading the witness statement of Andrew James Skelton:
  - a. The travellers were aggressive towards security personnel, physically assaulting the guard on duty at the gate through which they entered and forcing him to give them access to the gate controls, after which they then provided access for the rest of their convoy. I understand that the travellers threatened that if security personnel attempted to hinder the group's activities, the personnel would be met with more serious violence.
  - b. The travellers stole a significant quantity of goods and materials from the site, causing substantial damage to buildings, structures and machinery in the process. Seven transformers were ripped out of the ground, copper wiring was stripped and taken from the site and cabling and guttering was severely damaged. Members of the group also located keys to vehicles and heavy machinery parked on site and proceeded to drive these around the site, attempting to use them to detach further materials to be stolen. I understand from Mr Skelton's witness statement that a dog handler on site described the situation overnight as "*carnage*".
  - c. The incursion was reported to police by on-site security personnel as soon as the travellers gained access, but I understand from the Claimant's Services Team Leader that the police initially advised that it was primarily a local council matter. I am aware that the Claimant's Services Team Leader himself called the police upon being informed of the incursion by on-site security and that the operator confirmed that the information would be passed along to Nottinghamshire Police officers and that a unit would be dispatched when available. I am aware that the Claimant's Services Team Leader instructed on-site security to report all criminal activity straight away to the police via 999, regardless of frequency. The Claimant made numerous calls to Nottinghamshire

Police between Friday 25 – Sunday 27 April 2025 reporting further criminal activity, and whilst officers attended and spoke with travellers on site several times throughout the weekend, no attempts were made by attending officers to investigate any criminal offences, arrest suspects or exercise any statutory power (including under the Criminal Justice and Public Order Act 1994) to remove the travellers from the site.

- d. Due to the lack of effective police response, the Claimant was forced to instruct two enforcement companies to assist with the removal of the travellers from the site. I understand from a discussion with the Power Station Site Manager that the enforcement officers posted a notice at the site at around 18:00 on Saturday 26 April 2025 instructing the travellers to vacate the site by 20:00 the same day. The travellers failed to comply with the terms of that notice. At around 10:30 on Monday 28 April 2025, enforcement officers and police officers gave a verbal instruction to the traveller group to vacate the site within 2 hours. The travellers only left the site later that afternoon, at around 15:00, when confronted with a combined force of 16 enforcement officers, supported by around 20 police officers. The police officers then escorted the travellers away from the site.

15. I exhibit the following photographs showing the traveller group on site and the damage caused by their actions:

Page	Description
<b>SC1/12</b>	25 April 2025 – 16:50  This CCTV image shows a convoy of vehicles belonging to the traveller group arriving at the eastern gate to the site, off Barton Lane. This is where individuals from the group physically assaulted the security guard on duty and required him to open the gates for the vehicles.
<b>SC1/13, 14</b>	25 April 2025 – 18:52  These two CCTV images show part of the initial group of travellers forming an encampment shortly after they forced entry to the site. A number of individuals are visible in the photos, with caravans parked on land to the west of the flue-gas desulfurization (" <b>FGD</b> ") plant. The majority of the group pictured appear to be men, but children are also visible.

<b>SC1/15-17</b>	<p>25 April 2025 – 21:50-52</p> <p>These three CCTV images show the same area as the above but later in the evening of 25 April 2025. The first two images show an individual holding what appears to be a large bag walking back towards the encampment. The third image shows a vehicle driving through the site. I am unable to identify if this vehicle belonged to the travellers or was a vehicle parked on site that had been appropriated.</p>
<b>SC1/18</b>	<p>29 April 2025</p> <p>This photograph was taken by an employee of the Claimant carrying out a site inspection the day after the travellers left the site. It shows one of the staff/contractor changing areas in disarray. The clothing and items on the floor and the open locker doors suggest that the lockers were looted.</p>
<b>SC1/19, 20</b>	<p>29 April 2025</p> <p>These two photographs were also taken on the site inspection. They show two of the staff offices in disarray. The open draws and cupboard doors, as well as the items on the floor, suggest that the rooms were looted.</p>
<b>SC1/21</b>	<p>29 April 2025</p> <p>This photograph was also taken on the site inspection. It shows one of the site vehicles parked in an area of hardstanding in the centre of the site. The serious damage to the vehicle, including a shattered rear windscreen, is visible. The photo also shows a significant quantity of grey material that is strewn across the area of hardstanding. I understand that this material was part of the transformer structures before they were destructively disassembled by the travellers, in order to extract the copper cores.</p>
<b>SC1/22</b>	<p>29 April 2025</p> <p>This photograph was also taken on the site inspection. It shows one of the copper cores of an electricity transformer that has been detached from its installation and destructively disassembled in an attempt to</p>

	unwind and remove the copper wiring. A significant quantity of the grey material described above is also shown strewn across the area of hardstanding.
<b>SC1/23</b>	<p>29 April 2025</p> <p>This photograph was also taken on the site inspection. It shows one of the Claimant's 360 excavators in a different location to its proper parking location and with its door open, indicating that it was driven by the travellers during the incursion. I believe from the location of the excavator and the grey material surrounding it in the photo that the excavator was used to break open the transformer structures to extract the copper cores.</p>
<b>SC1/24-27</b>	<p>29 April 2025</p> <p>These photographs are still captures from a video taken on the site inspection. They show the significant damage to cabling and the cable trays on the pipe bridge, which is a superstructure designed to support pipework and electricity cables between areas of the Power Station site. Cabling is mounted on the cable trays at height to keep it safely away from individuals at ground level. Cabling and the cable trays appear to have been wrenched from the superstructure, in an attempt to remove valuable metals. I understand from discussions with others within the Claimant following the incident that machinery on site, including a telehandler, was appropriated by the travellers to do this.</p>
<b>SC1/28</b>	<p>29 April 2025</p> <p>This is an additional still from the video taken on the site inspection. It shows how straps were tied to the end of cabling, so that the travellers could use vehicles or heavy machinery to wrench the cabling away from the superstructure so that it could be stripped of valuable metals and removed.</p>

16. There are well-known risks from electric shock and burns inherent in interfering with electricity apparatus where the apparatus is live. These risks are ordinarily controlled by appropriate training, risk assessment and method statements where works are

required to such apparatus, to ensure that they are carried out in a safe and planned manner. As is clear from the photos described above, the travellers engaged recklessly in systematic destruction and disassembly of apparatus on site for the purpose of stealing valuable materials, without any authority or oversight from the Claimant and without adhering to any safe methodology, thereby putting themselves (and potentially the Claimant's staff and contractors on site at the time or subsequently) at significant risk of serious injury or, at worst, death.

17. The Claimant is still quantifying its total financial loss from the incursion. As at the date of this statement, the Claimant currently estimates its total loss at £1.85 million. This is comprised of:
  - a. Security enforcement costs - £40,000;
  - b. People impact costs (i.e. standing staff/contractors down, unproductive labour, pausing decommissioning works) - £456,000;
  - c. Indicative value of goods (tools etc.) identified as stolen - £48,000;
  - d. Estimated scrap value of copper stolen from the transformers - £66,000;
  - e. Value of losses and asset damage (i.e. damage to structures and buildings on site) - £667,000;
  - f. Indicative damage to site vehicles - £35,000;
  - g. Loss and damage to cables and cable supports - £190,000;
  - h. Loss of earthing conductor - £4,000;
  - i. Additional required enhanced security measures (e.g. hostile vehicle mitigation blocks) - £47,000; and
  - j. Environmental remediation action - £293,000.
18. Once the travellers were removed from the site following the April 2025 incursion, the Claimant took immediate measures to bolster site security and prevent a further incursion. I exhibit a slide from an internal briefing slide deck **[SC1/29]** which shows the large concrete hostile vehicle mitigation blocks that were installed in front of the main site gates and other potential points of access. The Claimant also increased the number of security personnel on site and added a roving dog patrol; erected a series of mobile CCTV towers to increase surveillance coverage around the site; and welded various security gates to prevent them being forced open.



#### 9 June 2025 police report

19. I am aware from discussions with the site team that on 9 June 2025 a police officer from Nottinghamshire Police attended the gatehouse at the site and informed security personnel that she was aware of three traveller camper vans parked in a business park near to the Power Station (though she did not specify the exact location) and advised additional vigilance by the site team. I am not aware, nor do I believe the police officer expressed a view on, whether these travellers were from the same group involved in the April 2025 incident.
20. As a result of this report, the Claimant instructed site security personnel to be more vigilant and carry out more frequent patrols.

#### 26 June 2025 incident

21. Shortly before 23:00 on Thursday 26 June 2025, a group of travellers in around 10 vans and caravans began to force entry to the Power Station site via the same gate in the east of the site that was used on 25 April 2025. Due to the additional security measures that the Claimant had implemented (as described in paragraph 18 above), the travellers were delayed in their ability to gain entry. The traveller group used cutting equipment to cut through the bifold gates and locks and used vehicles with chains and ropes to force open the outer gates and move the concrete hostile vehicle mitigation blocks that had been placed in front of the gates.
22. Security personnel identified the incident immediately and informed Nottinghamshire Police, who responded with 10 patrol vehicles. With this significant police presence, the traveller group abandoned its attempt to enter the site and departed.
23. I exhibit photographs taken by employees of the Claimant on the morning of 27 June 2025 in the gate area showing:
  - a. one of the access barriers bent and the other barrier having been broken off **[SC1/30, 31]**, to provide access to the gate area;
  - b. one of the hostile vehicle mitigation blocks with a chain attached to it to allow it to be dragged by a vehicle **[SC1/32]**;
  - c. hostile vehicle mitigation blocks with tracks showing them having been dragged away from the gate further down the access road **[SC1/33]**; and
  - d. damage to one the gates itself **[SC1/34]**.

24. I also exhibit a series of screen captures from CCTV footage of the attempted entry showing:
- a. a group of travellers (top middle) forcing the barrier out of place to allow access for vehicles **[SC1/35]**;
  - b. a van being used to attach to the gate and force it open **[SC1/36]**;
  - c. travellers getting past the outer gate on foot **[SC1/37]**;
  - d. a hostile vehicle mitigation barrier having been dragged away from the gate by a van **[SC1/38]**;
  - e. the other hostile vehicle mitigation barrier being dragged away by another van **[SC1/39]**;
  - f. the traveller vehicle convoy beginning to enter past the outer gate **[SC1/40]**; and
  - g. police arriving on scene **[SC1/41]**.
25. In my view, this incident demonstrates that the April 2025 incursion was not a one-off and that there is a real and imminent risk that traveller groups make further attempts to enter the site. My belief is that the site has been specifically targeted by these groups following the Power Station's well-publicised decommissioning and that the site is likely viewed as an attractive target given that it contains a large quantity of potentially valuable goods and materials, particularly copper, that can be stolen and sold.
26. Whilst the Claimant has taken the measures described earlier to bolster site security, this was clearly insufficient to deter travellers from attempting to enter the site again on 26 June 2025. The additional security measures delayed the travellers from gaining access on that occasion long enough for police officers to respond but this cannot be guaranteed in future. Further, as the police response to the April 2025 incident showed, officers may not always respond quickly to a reported attempted incursion and may take the view (as they did previously) that unlawful access to the site is a local council or civil matter. The Claimant continues to keep its security arrangements under review but has not identified any additional protective measures that would meaningfully guard against future incursions at proportionate cost.

#### 17 July 2025 police report

27. I am aware from discussions with the Power Station Site Manager that, on 17 July 2025, a police officer from the local neighbourhood policing team contacted the Site Manager to advise of the continued presence of traveller groups in the local area, believed to be those responsible for the attempted intrusion on 26 June 2025. At the time of this notification the group were located at an industrial estate on Centurion Way, Nottingham NG2 (on the south-west side of Nottingham and c. 7 miles from the Power Station), though I understand police had recently used their statutory powers to remove them from another location in West Bridgeford, south of Nottingham.

#### Other traveller activity on similar industrial sites

28. As well as the incidents described above at the Power Station, I am aware (from the sources described below) of a number of similar incidents at industrial facilities. I am also generally aware through my UK-wide security role for the Claimant that such facilities are seeing an increase in copper theft because of commodity price fluctuations caused by wider market volatility.
29. I am aware from news coverage [SC1/42-43] that a group of travellers entered the former Vauxhall factory in Luton on 9 May 2025 and set up an encampment, before they moved on during the course of 10 May 2025. This came shortly after there was news coverage about the cessation of production at the factory and its sale to a new owner.
30. I am aware from discussions with North Wales Police that on 2 May 2025 there was a traveller incursion on an industrial site near to the Connah's Quay power station (a power station also owned and operated by the Claimant). I was informed that a security guard was assaulted and access was forced onto the site.
31. Both North Wales Police and British Transport Police have made also made me aware that in that area of north Wales there is evidence of copper theft, namely evidence that on various land parcels the rubber casing of copper cabling has been burnt to allow access to the copper cores.

#### Impact of traveller incursions

32. As I have described above, traveller incursions have serious consequences for the Claimant and the Power Station site. Alongside the substantial financial loss described in paragraph 17 above, damage to site requires staff to be redirected from

their normal duties to inspect and remedy. This sets back the decommissioning timetable and ultimately delays the delivery of the redevelopment programme that is planned for the site, disadvantaging the local community.

33. Further, such incursions bring significant risks to the travellers themselves. As outlined in paragraphs 9 and 16 above, even in decommissioning there are a large number of risks and hazards throughout the Power Station site. Traveller groups will not necessarily be aware of these or how to mitigate them and could therefore suffer injury or, at worst, death. This risk is particularly acute from the travellers' interference with high voltage cabling and transformers and their unauthorised use of heavy machinery. Further, the travellers' activities also pose a severe risk to the Claimant's staff and contractors on site, including from disturbed live electrical apparatus and potential for fire.
34. The Claimant therefore seeks an injunction against persons unknown (as defined in the Claim Form) to ensure that it can bring contempt proceedings should any traveller groups unlawfully access the site and to serve as a deterrent against future such access.

#### **Threat to the Power Station from urban explorers**

35. In April 2024, five urban explorers gained access to the Power Station site at night and climbed the main chimney stack which, as per paragraph 8 above, is 198 m high. I understand from a subsequent internal investigation by the Claimant that they were on site for around five hours. At that time the Power Station was operational and they were therefore at risk from not only the risks described in paragraph 9 above but also heightened risk of exposure to dangerous chemicals such as ammonia and electric shock or burns from additional live high voltage electricity apparatus. Four of these individuals were arrested – the names I was provided by Nottinghamshire Police were that of the First Defendant, Harvey Barter, Cassandra Downs and Benjamin Stannard. Other than the information that they were arrested in April 2024, I do not have additional specific intelligence regarding other past incursions, or intention to enter the Power Station site again in future, by the three individuals other than the First Defendant. I understand from discussions with site personnel that, as of September 2024, Nottinghamshire Police dropped its investigation into all four individuals.

36. Since that incident, the Claimant has implemented further measures to secure the site, including additional dog patrols, additional CCTV cameras (including those with automatic detection functionality) and restructuring security teams so that more individuals are on patrol at any given time. However, through research on social media I am aware that there have been multiple incursions at the Power Station over recent months (which I detail further below). The Claimant's measures have therefore not been wholly successful at preventing unauthorised entry – this is likely because of the determination of the trespassers to defeat the Claimant's security measures, coupled with the sheer size of the site, which has a 5 km perimeter fence. Even with the Claimant's multi-faceted security operation, it is very difficult to continuously monitor every part of the perimeter so as to prevent one motivated individual, or a small group of such individuals, from cutting through or scaling the fence.
37. Given that: the Claimant's additional security has seemingly not prevented further incursions from urban explorers; there continues to be an active online community of individuals and groups that express interest in entering the site; and the criminal justice system is seemingly not providing a sufficient deterrent, the Claimant has concluded to seek an injunction against both certain specified individuals that it has identified as having previously trespassed on the Power Station site and posing a particular risk of doing so again, as well as persons unknown (as defined in the Claim Form) to capture the many individuals not specifically identified by the Claimant but who nonetheless pose a real and imminent risk of attempting to.
38. I first describe individuals that I have identified from social media as having previously trespassed at the Power Station site and who, on the basis of their posts, I consider to pose a real and imminent risk of returning. I then go on to discuss the wider threat from the urban explorer community generally.

Joshua Barter, Sam Williams and Ian Johnson

39. I exhibit the Facebook profile page of Joshua Barter<sup>1</sup> [SC1/44], who states on that page that he is from Doncaster. No current employer is stated, nor is an address or contact information given.
40. Mr Barter's cover photo<sup>2</sup> is him sitting atop a tall structure at another power station (from the structures visible and the number of cooling towers I do not consider this

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<sup>1</sup> <https://www.facebook.com/joshua.barter.54>

<sup>2</sup> <https://www.facebook.com/photo/?fbid=1550472288661482&set=a.178002282575163>

to be the Power Station). His profile picture<sup>3</sup> is him sitting in the (seemingly abandoned) control room of what appears to also be a power station.

41. I also exhibit the Facebook profile page of Sam Williams [SC1/45]. His page features a cover photo of him and Mr Barter on top of the main chimney stack at the Power Station and a profile photo also on top of a tall structure in what appears to be a power station. His 'Intro' says "... powerrrrrrrr stationssssssssssssssssssss 😊" and his employment is stated to be (I assume jokingly) at "Ratcliffe-on-Soar Power Station". As far as I am aware, Sam Williams is not and never has been employed by the Claimant, whether at the Power Station or otherwise.
42. I also exhibit the Facebook profile page of Ian Johnson [SC1/46]. Mr Johnson's profile has a city skyline image as the cover photo, with the text "URBEX LOST & FOUND". A photo posted on 20 June 2025 appears to show him in an industrial facility of some description.
43. A post by Mr Barter on 12 June 2025 at 18:43<sup>4</sup> [SC1/47] features a video of the main chimney stack at the Power Station and a photo of Mr Barter sitting atop that stack with six of the Power Station's eight cooling towers visible in the background. The caption reads "Bored 🤔🤔 good job we hit it before scaffold got moved 🙌".
44. There are two comments from a Sam Williams, the first reading "You Father's Day present is somet to do with Ratcliffe" [sic], to which Mr Barter reacted with a laughing emoji, and the second being a photo of Mr Williams with two large structures in the background, which I cannot definitively identify.
45. A post by Mr Barter also dated 12 June 2025 (at 18:49)<sup>5</sup> [SC1/48] shows Mr Barter protruding lying at the edge of the chimney stack, with one of the cooling towers visible behind him.
46. A separate post, dated 13 April 2025<sup>6</sup> [SC1/49], shows Mr Barter in the turbine hall at the Power Station, with a banner clearly visible behind him referring to the closure of the Power Station. In the comments an Ian Johnson says "I forgot about them pics we pushed it that night lol 😂", indicating that he was also present. Later in the

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<sup>3</sup> <https://www.facebook.com/photo/?fbid=1808928049482570&set=a.110136046028454>

<sup>4</sup> <https://www.facebook.com/joshua.barter.54/posts/pfbid0QUTUa2SDsb6eVHZ4tv8pmvKMZguCq1ZMWNUYH1HK11iXKynx6KhYBN5HuZkHsaCGI>

<sup>5</sup> <https://www.facebook.com/joshua.barter.54/posts/pfbid02z2oHskRTqkyFeiCWKyZ75MyCfnKSrRGSHK4eh7TnhxxVqCjRNnPDsdpe61LZNp6al>

<sup>6</sup> <https://www.facebook.com/photo?fbid=2403483806693655&set=a.111529162555809>

comments, Mr Barter says *"tbh i dont care if we ever get in control room its to modern put 1 on 🤔🤔"*.

47. In a separate video also posted on 13 April 2025<sup>7</sup> (screenshots at **SC1/50-52**), Mr Barter videos three other male individuals walking through the boiler house of the Power Station. A male voice, which I presume to be Mr Barter's says: *"We're in Ratcliffe. And f\*cking yep we do own the place. It's ours now. We're here to decommission it."* By reference to the comments on this video from Mr Johnson and the profile pages of Mr Johnson and Mr Williams, I believe two of the individuals shown in the video to be Mr Johnson and Mr Williams. I am not able to identify the third individual. Mr Johnson says in a comment on the video post: *"some great trips in there I've loads of videos to post"* [**SC1/52**], suggesting multiple trespasses at the Power Station.
48. In a post dated 25 March 2025 [**SC1/53**], for which the photo or video content is not available to those who are not friends with Mr Barter, Mr Barter writes *"Ratcliffe with a cold 1 🤔🤔 we love exploreing them live 🤔"* [sic].
49. There are also a number of photos and videos on Mr Barter's page showing him inside the West Burton A power station. One such post is dated 10 May 2025<sup>8</sup> [**SC1/54**] and shows a video of what I assume to be part of the power station site. The caption reads *"With daylight creeping in it was time to exit west burton powerstation how nice was it they opened a gate for us"*. In the comments on the video, Mr Barter and Mr Johnson appear to discuss a previous incursion into the Fiddlers Ferry power station, Mr Johnson saying *"even easier then [sic] fiddlers lol 🤔"* and *"lol 🤔 well fiddlers was a walk in still is lol 🤔"*. Mr Barter responds with *"i wouldnt no ive never been back after injunction... [sic]"*. This exemplifies the deterrent effect on urban explorers of an injunction being granted for a site.
50. In a video posted on 7 February 2025<sup>9</sup> by Mr Barter (screenshot at **SC1/55**), Mr Barter presents a birthday cake to Mr Williams with two lit candles (a potentially significant fire hazard in the context of an operational or decommissioning power station). In the video, Mr Barter identifies that they are standing on the *"West Burton boiler house roof"* and says that they have *"gotten in again"*. A third male individual in the video (who Mr Barter identifies as "Ian", and so I consider may be Mr Johnson)

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<sup>7</sup> <https://www.facebook.com/joshua.barter.54/videos/685023223926635>

<sup>8</sup> <https://www.facebook.com/joshua.barter.54/videos/677363694904785>

<sup>9</sup> <https://www.facebook.com/joshua.barter.54/videos/1132980044677323>

says to Mr Williams as he blows out the candles, *"What is your wish? To get up some more chimneys?"*. Mr Williams replies, *"Yeah – more power stations"*. The other individual says *"You've missed them all – they're all gone"* and Mr Williams says *"Ratcliffe"*. I consider this to demonstrate Mr Williams' desire to enter the Power Station site on future occasions.

51. I exhibit at **SC1/56-60** a compilation of posts on Mr Williams' page that show him having entered multiple power stations and scaled various tall structures within those facilities. The posts dated 4 February 2025, 20 January 2025, 10 December 2024 and 14 October 2024 show the Power Station.
52. I exhibit the Facebook page for the group 'Urbex Lost and Found' **[SC1/61]**. I believe that this group was created by Mr Johnson because the 'About' page links to an Instagram account with the username "johnsonian175" which has the name Ian Johnson and the same profile picture as Mr Johnson's Facebook profile **[SC1/62]**. The group has 287,000 followers.
53. I exhibit a compilation of posts from the Urbex Lost and Found group that show the Power Station **[SC1/63-67]**. The post dated 14 April 2025 is captioned *"Little look inside Ratcliffe power station from one of many visits such a waste closing these down..."* This indicates that the poster (who I believe to be Mr Johnson based on the above) has entered the Power Station on multiple occasions.

#### Luke Badharee

54. I exhibit the Facebook profile page of Luke Badharee **[SC1/68-74]**. On 1 July 2025 Mr Badharee updated his profile photo to a photo of himself and another male individual inside the turbine hall of the Power Station **[SC1/75]**. The caption reads *"Ratcliffe – Some awesome times spent in here"*. An individual called Sam Skellern has commented *"Wonder what is happening in their [sic] right now?"* and Mr Badharee replies *"Shall we go and find out? 🤔"*
55. This indicates that Mr Badharee has entered the Power Station on multiple previous occasions and has expressed a desire to do so again. That he may be inclined to do so is emphasised by his post of 30 June 2025 of a photo of a GoPro with the caption *"Some nice stuff coming this year and some madness ahead... It is time I got this out and started using it again. 🤔🤔"* **[SC1/76]**.
56. I exhibit a compilation of other posts on Mr Badharee's Facebook profile that show him inside various power stations, as well as his general interest in power stations



[SC1/77-82]. The posts dated 16 March 2025, 5 February 2025, 26 January 2025 and 31 December 2024 show him having entered the Power Station. The post dated 16 March 2025 describes the photos as having been from *"the 2nd visit"*.

#### Injunction against individuals

57. Given the above substantial evidence of multiple previous trespasses to the Power Station site by Joshua Barter, Sam Williams, Ian Johnson and Luke Badharee, and their assorted comments expressing a desire to continuing entering the site without authorisation, the Claimant seeks an injunction to restrain them from so doing. As noted in the discussion at paragraph 49 above, I consider that the grant of an injunction for a site is likely to serve as an effective deterrent.

#### Other groups

58. The urban explorer community extends far beyond the individuals discussed above. I exhibit a compilation of posts on the Facebook group called "Abandoned UK", which posts photos and videos captured from within various abandoned buildings by members of the Urbex community [SC1/83-88]. There are many such photos and videos of industrial facilities and particularly power stations in this group, including West Burton A, Cottam, Fiddlers Ferry and the Power Station. As at the date of this witness statement, the group has around 239,000 followers. Whilst I acknowledge that not all of these people (and indeed likely the vast majority) will not be active urban explorers themselves and/or based in the vicinity of the Power Station, this high degree of interest in urban exploration and specifically the Power Station indicates that there is likely to be a substantial group of individuals that are inclined to attempt to enter the site.
59. By way of further example, I exhibit a post on the "r/UrbexUK" page on the internet forum Reddit dated 12 May 2025 [SC1/89]. A person with the username "fatjer\_6699" posts *"Thinking of getting into Ratcliffe on soar power station... As title says. There's great cooling towers and a 200m chimney. The whole site is the size of a village. There's electric fencing all around but I think it's doable. Has anyone ever gotten in? any info on shift times for a power station getting decommissioned?"*. In the comments, which exchange tips for gaining access to the site, a person with the username "Responsible-Put-276" states *"Me and my mate went on a scout there once... might drone scout again in summer"*. This is just another indication of the interest in entering, and frequent attempts to enter, the Power Station site.

60. I also exhibit a screenshot of a YouTube video titled 'Ratcliffe power station the final coal powered plant to close' posted by user 'ABANDONED UK' on 30 September 2024 and its comments [SC1/90-93]. The video is 12:45 in duration and has 5,185 views and 61 comments. It shows a group of individuals (who I am not able to identify) walking around various areas of the Power Station whilst it was still operational. Comments from the poster under the video include:
- a. *"security didn't have a clue we're good at getting in unnoticed..."*
  - b. *"we wanted to be different not often you get to see a power station in operation"*
  - c. In response to another commenter asking whether they got permission, *"nope why do you think we was sneaking about"* and, in response to a follow-up comment asking if it was *"sketchy"* going around, *"not really was more of a mission not to get caught"*.

Injunction against urban explorer persons unknown

61. In light of the above, I consider that there is a real and imminent risk of further incursions by presently unidentified urban explorers. The Power Station is an iconic local landmark and is seemingly of significant interest to the urban exploration community. There is evidence of multiple previous incursions by individuals whose identities cannot be confirmed but who are part of this community and there is recent online discussion by similarly anonymous individuals actively planning to attempt to enter the site. The Claimant therefore seeks an injunction against persons unknown.
62. An injunction is sought in part to protect the integrity of the Power Station site and prevent damage to the perimeter fence, but is primarily for the safety of the urban explorers themselves. As the site is now in decommissioning and is progressing towards demolition, structures will be undergoing partial deconstruction at varying times and will be of variable structural stability. Urban explorers could put themselves at risk of serious harm or death by scaling structures in such a condition, which they would likely not be able to easily identify (and particularly not at night, which is when they appear to usually enter the site). By entering the site unauthorised, and roaming it at night, the urban explorers are also at significant risk from the matters I described in paragraph 9 above.

**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:  
  
.....  
38363519E14F45D...

**STEPHEN FOSTER CLOSE**

**DATED**

21st July 2025  
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