IN THE HIGH COURT OF JUSTICE

Claim no. PT-2025-000739

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 THE
 PARTICULARS OF CLAIM) WITHOUT THE CONSENT OF THE CLAIMANT

Defendants

HEARING BUNDLE

GBR01/122160936_1

HEARING BUNDLE – INDEX

#	Document	Date	Page
Claim and application documents			
1.	Claim Form	21.07.25	7
2.	Particulars of Claim	21.07.25	13
3.	Application Notice	21.07.25	24
4.	Draft Order		29
Witne	ess evidence		
5.	Witness Statement of Graeme James Robertson	18.07.25	36
6.	Exhibit GJR1	18.07.25	41
	1 - Plan showing registered titles		43
	2 - Official Copy (Register) – NT422266	01.07.25	44
	3 - Official Copy (Plan) – NT422266	06.06.24	52
	4 - Plan showing proposed injunction area		53
	5 - Official Copy (Register) – SYK708046	17.07.25	54
	6 - Official Copy (Register) – NN42715	17.07.25	57
	7 - Plan showing proposed notice locations		59
7.	Witness Statement of Stephen Foster Close	21.07.25	60
8.	Exhibit SC1	21.07.25	79
	1 - BBC news article on Power Station shutting down	27.09.25	84
	2 - Photograph of Power Station		88
	3 - Aerial image of Power Station		89

4 - Photo of arrival of Vehicles	25.04.25	90
5 - Photo of encampment	25.04.25	91
6 - Photo of close up of individuals forming encampment	25.04.25	92
7 - Photo of individual with large bag, returning to encampment	25.04.25	93
8 - Photo of camp on site and individual carrying materials to vans	25.04.25	94
9 - Photo of vehicle being driven through site	25.04.25	95
10 - Photo of staff changing area in disarray	29.04.25	96
11 - Photo of staff office in disarray	29.04.25	97
12 - Photo of 2 nd staff office in disarray	29.04.25	98
13 - Photo of damaged vehicle and grey material	29.04.25	99
14 - Photo of detached copper core of electricity transformer	29.04.25	100
15 - Photo of excavator with door open	29.04.25	101
16 - Photo of damage to cabling and cable trays on pipe bridge	29.04.25	102
17 - Photo of damage to cabling and cable trays on pipe bridge	29.04.25	103
18 - Photo of damage to cabling and cable trays on pipe bridge	29.04.25	104
19 - Photo of damage to cabling and cable trays on pipe bridge	29.04.25	105
20 - Photo of straps tied to cabling	29.04.25	106
21 - Photo of security measures taken immediately after incursion	29.04.25	107

22 - Photo of access barrier bent 23 - Photo of access barrier broken off 24 - Photo of hostile vehicle mitigation block with chain attached 25 - Photo of hostile vehicle mitigation block with drag tracks	27.06.25 27.06.25 27.06.25	108 109
24 - Photo of hostile vehicle mitigation block with chain attached 25 - Photo of hostile vehicle mitigation block with		
chain attached 25 - Photo of hostile vehicle mitigation block with	27.06.25	110
	27.06.25	111
26 - Photo of damage to gate	27.06.25	112
27 - Photo of travellers forcing barrier out of place	26.06.25	113
28 - Photo of van forcing gate open	26.06.25	114
29 - Photo of travellers passing through outer gate	26.06.25	115
30 - Photo of van dragging hostile vehicle mitigation block	26.06.25	116
31 - Photo of van dragging second hostile vehicle mitigation block	26.06.25	117
32 - Photo of vehicles entering	26.06.25	118
33 - Photo of police arriving	26.06.25	119
34 - BBC news article on traveller encampment at former Vauxhall factory	12.05.25	120
35 - Joshua Barter Facebook profile (accessed 03.07.25)		122
36 - Sam Williams Facebook profile (accessed 03.07.25)		123
37 - Ian Johnson Facebook profile (accessed 03.07.25)		124
38 - Joshua Barter social media post and comments	12.06.25	125
39 - Joshua Barter at edge of chimney stack	12.06.25	126

40 - Joshua Barter in turbine hall + comments	13.04.25	127
41 - Screenshot of video walking through Power Station	13.04.25	128
42 - Screenshot of video walking through Power Station	13.04.25	129
43 - Screenshot of video walking through Power Station	13.04.25	130
44 - Facebook comments	25.03.25	131
45 - Screenshot of video in West Burton Power Station	10.05.25	132
46 - Screenshot of video on roof of power station facility	07.02.25	133
47 - Sam Williams compilation of posts		134
48 - Urbex Lost and Found Facebook page (accessed 03.07.25)		139
49 - Ian Johnson Instagram profile (accessed 03.07.25)		140
50 - Urbex Lost and Found posts from inside Power Station (accessed 03.07.25)		141
51 - Luke Badharee Facebook profile (accessed 03.07.25)		146
52 - Luke Badharee updated profile picture in Power Station (accessed 03.07.25)		153
53 - Luke Badharee photo of GoPro	30.06.25	154
54 - Luke Badharee compilation of posts		155
55 - Abandoned UK Facebook group (accessed 03.07.25)		161
56 - Reddit comments regarding Ratcliffe-on- Soar power station access	12.05.25	167

	57 - Screenshot of YouTube video of trespass in power station and comments	30.09.24	168
9. Witness Statement of Andrew James Skelton 2		21.07.25	172
10.	Second Witness Statement of Graeme James Robertson	24.07.25	177
11.	Exhibit GJR2	24.07.25	182
	1 - Warning Notice for Application and Hearing		184
	2 - Text of Facebook message to First to Fourth Defendants		185
	3 - Doncaster address – Royal Mail proof of delivery	24.07.25	186
	4 - Northampton address – Royal Mail notice that delivery was unsuccessful	24.07.25	187
	5 - Statement of process server re hand delivery to Doncaster address	24.07.25	188
	6 - Statement of process server re hand delivery to Northampton address	24.07.25	194
	7 - Screenshot of Joshua Barter Facebook post (accessed 24.07.25)	24.07.25	200
	8 - Screenshot of Luke Badharee Facebook post (accessed 24.07.25)	24.07.25	201
	9 - Screenshots of Urbex Lost & Found Facebook post (accessed 24.07.25)	24.07.25	202
	10 - Screenshot of Uniper injunction website	24.07.25	205
	11 - Email to Kayleigh Williams	24.07.25	206



Claim Form

In the High Court of Justice Business and Property Courts of Figural and Wales Property Trusts and Probate List (ChD)

Fee Account no.

Help with Fees - Ref no. (if applicable)

For count we only

Claim no.

Issue date

You may be able to issue your claim online which may save time and money. Go to www.moneyclaims. service.gov.uk/make-claim to find out more.

Claimant(s) name(s) and address(es) including postcode Uniper UK Limited of Compton House 2300 The Crescent, Birmingham Business Park, Birmingham, England, B37 7YE



Defendant(s) name and address(es) including postcode

(1) Joshua Barter, (2) Sam Williams, (3) Ian Johnson, (4) Luke Badharee and (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

Brief details of claim

The Claimant seeks an injunction to restrain the Defendants from acts of trespass and/or private nuisance on the land shown edged in red (but excluding the land shaded blue) on the plan appended to the Claim Form, being the site of a former power station at Ratcliffe-on-Soar forming part of the title registered at HM Land Registry under title number NT422266.

Value

Non-monetary claim

Defendant's name and address for service including postcode

Joshua Barter, Sam Williams, Ian Johnson, Luke Badharee and Persons Unknown Ratcliffe-on-Soar Power Station Ratcliffe-on-Soar Nottingham NG11 0EE

	£
Amount claimed	
Court fee	646
Legal representative's costs	
Total amount	

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.				
You must indicate your preferred County Court Hearing Centre for hearings here (see notes for guidance)				
Business and Property Courts, Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL				
Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?				
Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.				
✓ No Does, or will, your claim include any issues under the Human Rights Act 1998?				
Yes No				

	Claim no.
Particulars of Claim	
✓ attached	
to follow	

Statement of truth

I understand that proceedings for contempt of court may be brought against a person 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. **Note:** you are reminded that a copy of this claim form must be served on all other parties.

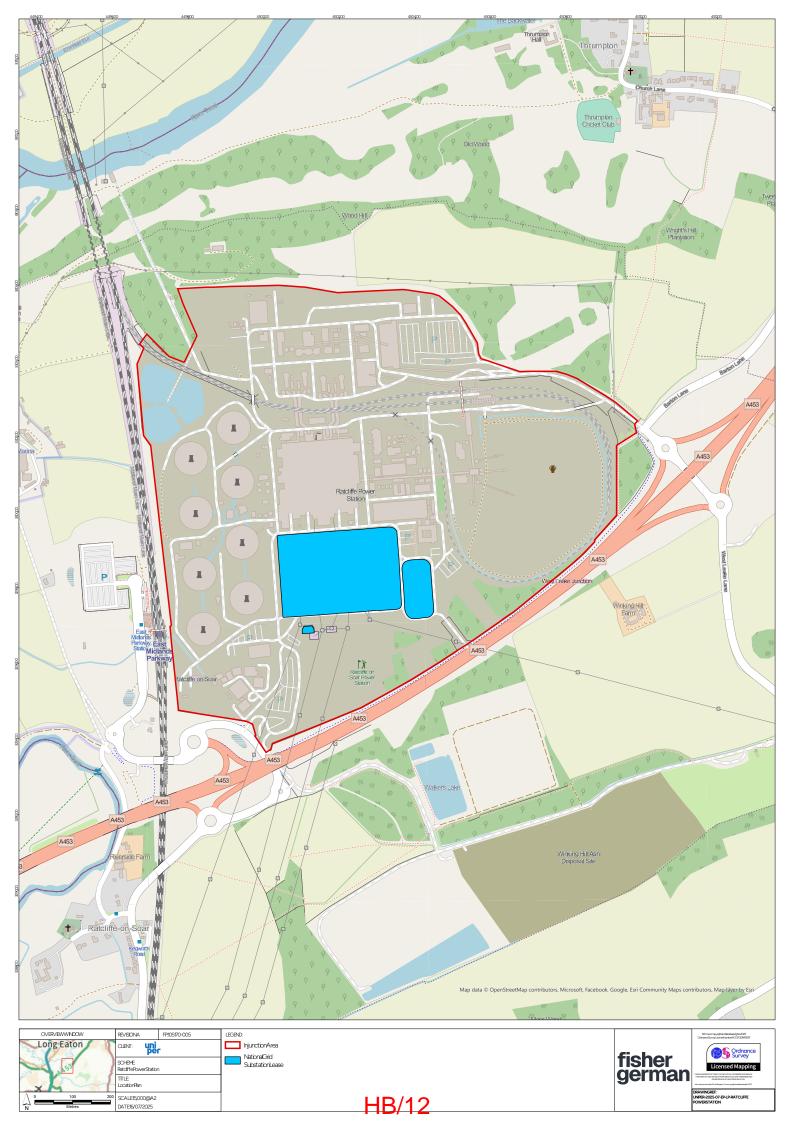
without an honest belief in its truth.			
I believe that the facts stated in this claim form and any attached sheets are true.			
The claimant believes that the facts stated in this claim form and any attached sheets are true. I am authorised by the claimant to sign this statement.			
Signature			
Signed by: Mgel Walker DC388E587D9840E			
✓ Claimant Litigation friend (where claimant is a child or protected party) Claimant's legal representative (as defined by CPR 2.3(1))			
Date Day Month Year			
21 07 2025			
Full name			
Nigel Walker			
Name of claimant's legal representative's firm			
Herbert Smith Freehills Kramer LLP			
If signing on behalf of firm or company give position or office held			
Director - Energy Asset Management, Uniper Energy			

Building and street Herbert Smith Freehills Kramer LLP Second line of address Exchange House, Primrose Street Town or city London County (optional) Postcode E | C | 2 | A | 2 | E | G | If applicable Phone number 020 7466 2793 DX number 28 London Your Ref. 8118/21992/31074640 Email injunctions@hsfkramer.com

Claimant's or claimant's legal representative's address to which

documents should be sent.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter



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:
 - 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;
 - 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;
 - 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;
- 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

8

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.

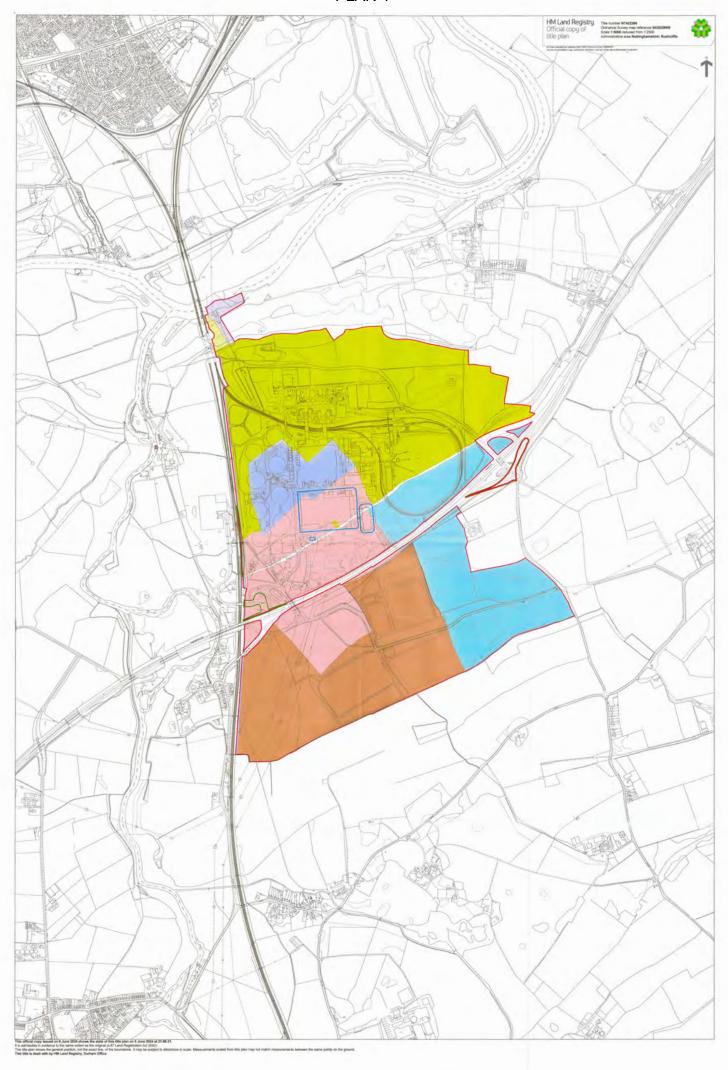
Signed:

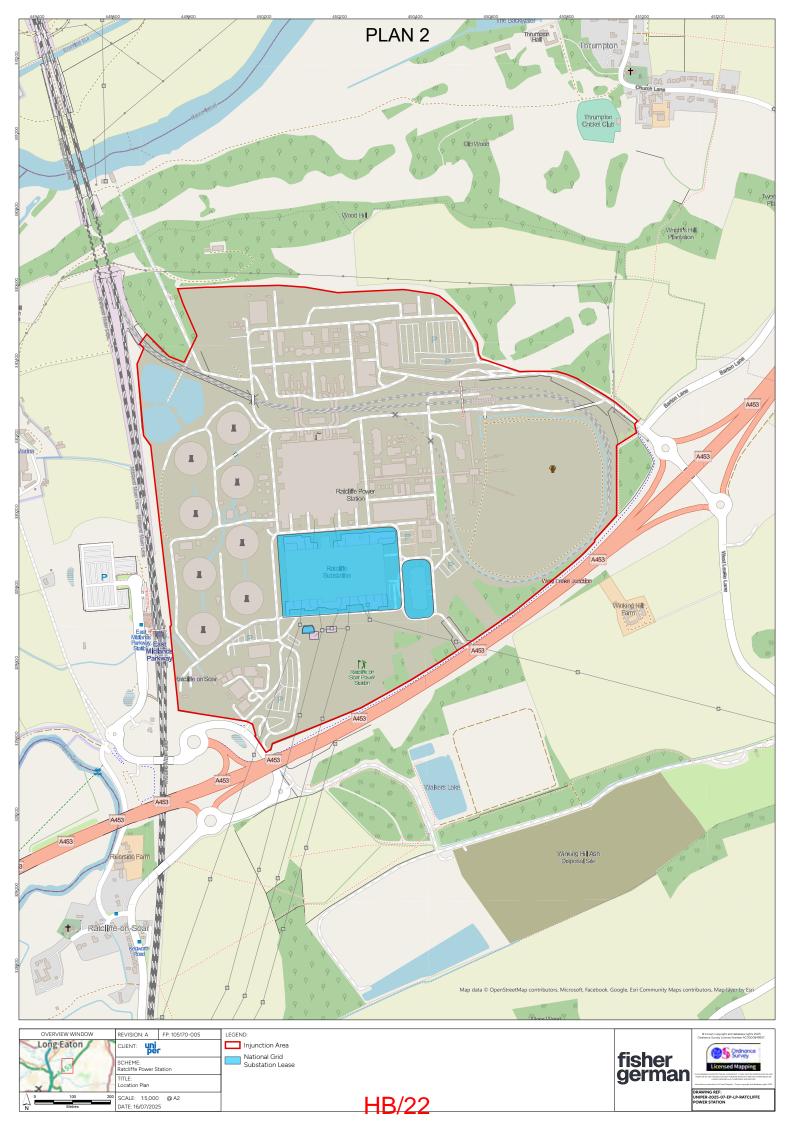


Nigel Walker

UNIPER UK LIMITED

Date: 21 July 2025





UNIPER UK LIMITED

 \mathbf{v}

(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

PARTICULARS OF CLAIM

Herbert Smith Freehills Kramer LLP
Exchange House
Primrose Street
London
EC2A 2EG

Ref: 8118/21992/31074640

Solicitors for the Claimant

N244

Application notice

For help in completing this form please read the notes for guidance form N244Notes.

Notice of hearing Application will be heard at 7

Rolls Building, London, EC4A 1NL Date: 30 July 2025 Time: N.B. 10:30 AM

7 1 10 1 10 1

Court: 10

	COURT OF VUS		
Name of court High Court of Justice Business and Property Courts of England and Wales Property, Trusts and Probate List (ChD)	Claim TON		
Fee account no.	Help with Fees - Ref. no.		
(if applicable)	(if applicable 21 Jul 2025		
	HWF -		
Warrant no.	A PAROL OF ELEP		
(if applicable)	SP SHOPERTY COURTS OF END		
Claimant's name (including			
	ring Date: 30 Jul 2025 10:3		
Defendant's name (including ref.) The Rolls Buildings - Court 10			
(1) Joshua Barter (2) Sam Williams (3) Ian Johnson (4) Luke Badharee (5) Persons Unknown			
Date	21 July 2025		

1.	What is your name or, if you are a legal representative, the name of your firm?					
	Uniper UK Limited					
2.	Are you a	✓ Claimant	Defendant	Legal Represe	entative	
		Other (please specify)				
	If you are a leg	gal representative whom do	o you represent?			
3.	What order are	e you asking the court to n	nake and why?			
	1. An interim injunction to restrain the Defendants from acts of trespass and/or private nuisance on the land shown edged in red (excluding the land shaded blue) on the plan appended to the Claim Form. 2. An order for alternative service pursuant to CPR 6.15, 6.27 and 81.4(2)(c).					
4.	Have you attac	ched a draft of the order yo	ou are applying for?	✓ Yes	☐ No	
5.	5. How do you want to have this application dealt with?		n dealt with?	✓ at a hearing	without a hearing	
				at a remote he	aring	
6.	How long do y	ou think the hearing will la	st?	2 Hours	Minutes	
	Is this time est	timate agreed by all partie	s?	Yes	✓ No	
7.	Give details of any fixed trial date or period		od	N/A		
8.	What level of Judge does your hearing need?		eed?	High Court Judge		
9.	Who should be served with this application?		N/A			
9a	 a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9. 		N/A			

10. What information wi	ill you be relying on, in support of your application?
]	✓ the attached witness statement
[✓ the statement of case
]	the evidence set out in the box below
Please see the Parti	continue on a separate sheet. iculars of Claim and the attached Witness Statements of Stephen Foster Close, ton and Graeme James Robertson.

Docusign Envelope ID: 1A47FBBB-D9F4-40A7-A45B-B75A6A42D76C

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps,

support or adjustments you wish the court and the judge to consider.

✓ No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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.

✓ I believe that the facts stated in section 10 (and any continuation sheets) are true.			
The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.			
Signature			
Signed by: MgU Walker DC388E587D9840E			
✓ Applicant			
Litigation friend (where applicant is a child or a Protected Party)			
Applicant's legal representative (as defined by CPR 2.3(1))			
Date			
Day Month Year			
2 1 0 7 2 0 2 5			
Full name			
Nigel Walker			
Name of applicant's legal representative's firm			
Herbert Smith Freehills Kramer LLP			
If signing on behalf of firm or company give position or office held			
Director - Energy Asset Management, Uniper Energy			

Applicant's address to which documents should be sent.

Building and street

Herbert Smith Freehills Kramer LLP

Second line of address

Exchange House, Primrose Street

Town or city

London

County (optional)

Postcode

$$E \mid C \mid 2 \mid A \mid 2 \mid E \mid G$$

If applicable

Phone number

020 7374 8000

Fax phone number

DX number

DX 28 London

Your Ref.

8118/21992/31074640

Email

injunctions@hsfkramer.com

Claim No.

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

Before: [name of Judge]

[Date of Order]

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 BELOW) WITHOUT THE CONSENT OF THE CLAIMANT

	Defendants
INJUNCTION ORDER	

PENAL NOTICE

THIS IS AN ORDER OF THE COURT. IF YOU, THE WITHIN NAMED DEFENDANTS AND PERSONS UNKNOWN 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 TO BE 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 Claimant having applied for the relief set out below by application notice dated 21 July 2025

AND UPON the Court reading the witness statement of Stephen Foster Close dated 21 July 2025, the witness statement of Andrew James Skelton dated 21 July 2025 and the witness statement of Graeme James Robertson dated 18 July 2025 together with the exhibits to those witness statements

AND UPON the Court being satisfied that there is a sufficiently real and imminent risk of the Defendants committing trespass and / or nuisance and / causing damage to property to justify the grant of an injunction

AND UPON hearing [insert appearances]

AND UPON the following terms having the following meanings in this Order:

- (1) **'the Land'**: the land shown edged in red, but excluding the land shaded in blue, on the plan at Schedule 1 to this Order, being the site of the former power station at Ratcliffe-on-Soar forming part of the title registered at HM Land Registry under title number NT422266
- (2) "the Application Notice" means the application notice for the interim relief sought against the Defendants and for orders under CPR r.6.15, r.6.27 and r.81.4(2)(c), issued by the Claimant on 21 July 2025

AND UPON the Court accepting the Claimant's undertaking that the Claimant will comply with any order to pay damages that 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.

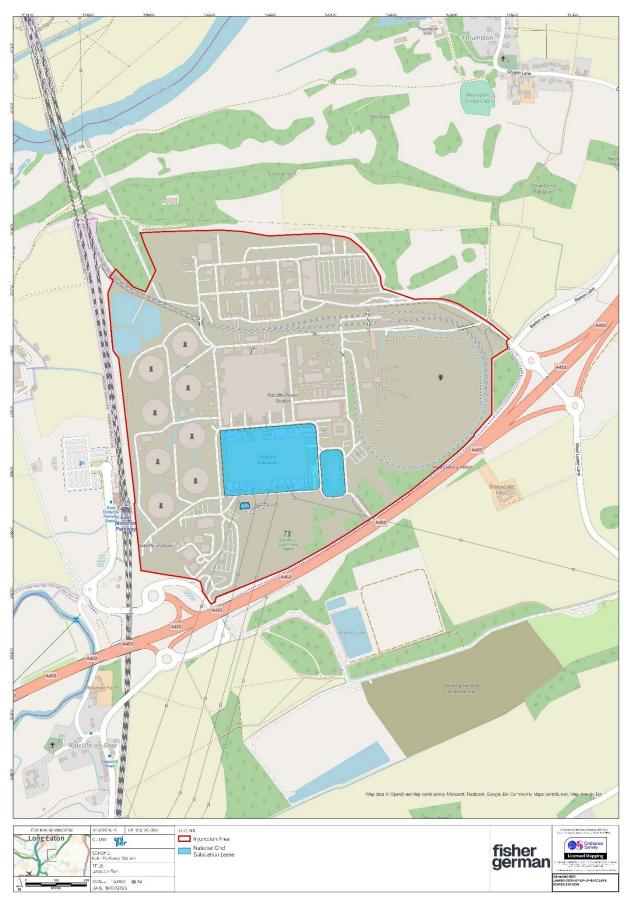
IT IS ORDERED THAT:

- 1. With immediate effect, until final disposal of the claim or further order or, if earlier, the date 12 months from the date of this Order, the Defendants and each of them, are prohibited from the following:
 - (a) entering onto or remaining on 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.
- 2. With immediate effect, until final disposal of the claim or further order or, if earlier, the date 12 months from the date of this Order, the Fifth Defendant is further prohibited from the following:
 - (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;

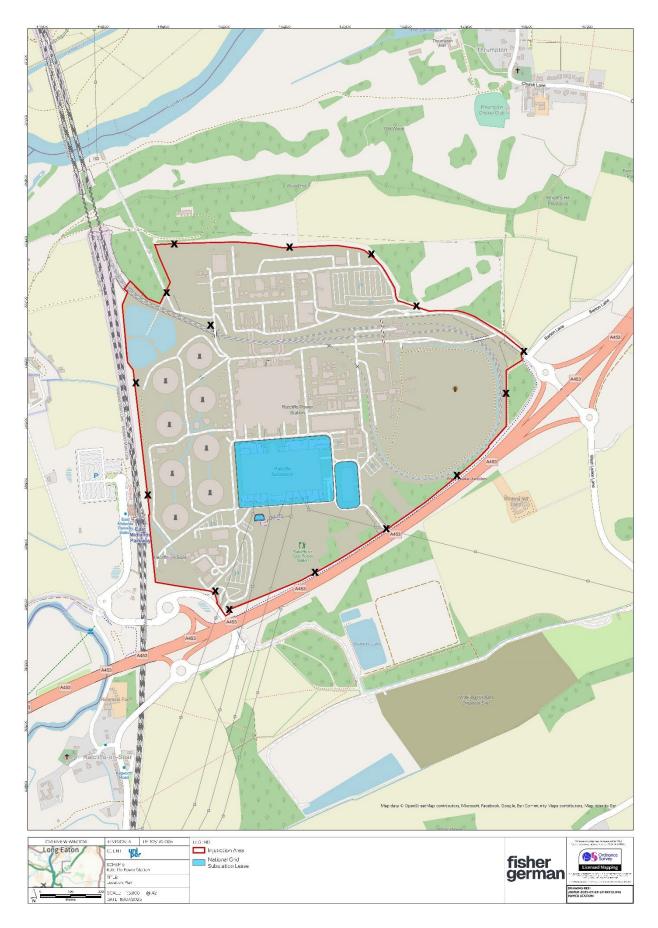
- (e) removing any goods or materials from the Land.
- 3. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge it, but, if they wish to do so, they must inform the Claimant's solicitors immediately (which they can do by sending an email to injunctions@hsfkramer.com) and in any event not less than 48 hours, excluding weekends and bank holidays, before the hearing of any such application.
- 4. Any person applying to vary or discharge this Order must:
 - (a) provide their full name and an address for service in the United Kingdom;
 - (b) file and serve on the Claimant's solicitors (by email to injunctions@hsfkramer.com) a skeleton argument and any evidence to be relied upon no later than 48 hours, excluding weekends and bank holidays, before the application hearing.
- 5. The Claimant has permission to apply to extend or vary this Order or for further directions. The Claimant must give the Defendants at least 48 hours' notice before the hearing of any such application, excluding weekends and bank holidays.
- 6. Pursuant to CPR r.6.15. r.6.27 and r.81.4(2)(c), the Claimant has permission to serve the Claim Form, Particulars of Claim, the witness statements of Stephen Foster Close, Andrew James Skelton and Graeme James Robertson (and their exhibits), the Response Pack, the Application Notice and this Order (together "the Documents") and also any application (with associated documents) made under paragraph 5, above, by an alternative method and at an alternative place, namely by:
 - (a) Uploading a copy of the Documents to the following page on the Claimant's website: https://www.uniper.energy/ratcliffe-power-station-site-injunction (the "the Website")

- (b) Affixing notices in the locations shown marked with an 'X' on the plan at Schedule 2 to this Order that state where the Documents can be found and obtained in hard copy and state the URL of the Website (and, in the case of the Order, stating that the Order has been made)
- (c) In the case of each of the First, Second, Third and Fourth Defendant, sending an electronic message to each of their Facebook accounts stating that a claim has been brought and an application made (and, in the case of the Order, that the Order has been made) and providing the URL of the Website where the Documents can be accessed
- 7. Pursuant to CPR r.6.15(2), the carrying out of the actions described at paragraphs 6(a) (c) above prior to the date of this Order is good service in respect of any of the Documents.
- 8. The Documents will be deemed to be served on the Defendants at 4pm on the date that the steps set out in paragraph 6, above, have been completed.
- 9. The date for filing an Acknowledgement of Service by the Defendants and / or an Admission shall be 14 days after service of the claim form.
- 10. The date for filing a Defence by the Defendants shall be 14 days after service of the claim form or 28 days after service of the claim form if an Acknowledgement of Service is filed.
- 11. Costs reserved.

SCHEDULE 1



SCHEDULE 2



IN THE HIGH COURT OF JUSTICE

Claim no. [

no. [

]

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 THE
 PARTICULARS OF CLAIM) WITHOUT THE CONSENT OF THE CLAIMANT

Defendants

WITNESS STATEMENT OF GRAEME JAMES ROBERTSON

- I, **GRAEME JAMES ROBERTSON**, of Herbert Smith Freehills Kramer LLP, Exchange House, Primrose Street, London EC2A 2EG **WILL SAY** as follows:
- I am a Senior Associate in the firm of Herbert Smith Freehills Kramer LLP ("HSF Kramer"). I have conduct of this matter on behalf of the Claimant, Uniper UK Limited.
- 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.

- I have read the Particulars of Claim and the final drafts of the witness statements of Stephen Foster Close and Andrew James Skelton for the Claimant. I adopt the definitions as in the witness statement of Stephen Foster Close.
- 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. There is now shown to me a bundle of documents, which I exhibit as "GJR1". I confirm that the documents in those exhibits are true copies of the documents. References in this witness statement to the page numbers in GJR1 are in the format GJR1/x.

Titles

- 6. I exhibit at **GJR1/3** a plan showing the registered titles at and immediately adjacent to the Ratcliffe-on-Soar Power Station (the "**Power Station**"):
 - a. The area edged and shaded green is the Claimant's freehold title, registered number NT422266.
 - b. The area edged and hatched blue is an electricity substation which the Claimant has let to National Grid Electricity Transmission plc on a long lease. The leasehold title is registered number NT318974.
 - c. The area edged and hatched red is a qualified freehold title owned by British Gypsum Limited, registered number NT513968. This relates only to the mines, beds, veins, seams, strata and deposits of gypsum in under or upon the land.
- 7. I exhibit at **GJR1/4**, **12** the official copy title register and title plan for the Claimant's freehold title, registered number NT422266.
- 8. I exhibit at GJR1/13 a plan showing the extent of the Power Station site over which the injunction is sought, being the area edged red but excluding the areas shaded blue (the "Land"). The Claimant has an immediate right to legal possession and control of the Land.

Service

First to Fourth Defendants

- 9. I understand from the witness statement of Stephen Foster Close that the First to Fourth Defendants to the Claimant's claim are individuals that the Claimant has identified from social media posts (and, for the First Defendant, from information from Nottinghamshire Police that he was previously arrested for entering the site) as having entered the Land without consent on previous occasions and who the Claimant considers will attempt to enter the Land again in future.
- 10. As these individuals have been identified solely from social media posts (save for the First Defendant), it has not been possible for the Claimant to identify a postal address or email address at which the Claimant is confident that they can be served with the claim documents.
- 11. The Claimant engaged the services of an enforcement company to attempt to trace such an address, and this resulted in the following addresses being identified:
 - a. for a Mr Joshua John Barter (possibly the First Defendant), 139 Wike Gate Road,
 Thorne, Doncaster DN8 5JH; and
 - b. for a Mr Luke William Badharee (possibly the Fourth Defendant), 11 Grove Road, Northampton NN1 3LH.
- 12. I exhibit the official copy title registers for the freehold of each of those addresses at GJR1/14, 17. Neither is registered to a Joshua Barter or a Luke Badharee. There are no registered leasehold interests shown on either of the titles. Whilst it is possible that the First and Fourth Defendants are short-term tenants at these addresses and thus their occupation is not reflected on the register, the Claimant has no information about this and cannot be sure that they would be notified of its claim and application if court documents were served solely at those addresses. The Claimant therefore intends, prior to the hearing of its application, to:
 - a. Send the claim documents by post, courier or by hand to the addresses identified in paragraph 11 above;
 - b. Upload a copy of the claim documents to the following page on the Claimant's website: https://www.uniper.energy/ratcliffe-power-station-site-injunction (the "Website");

- c. Affix notices in the locations shown marked with an 'X' on the plan exhibited at GJR1/19 that state where the claim documents can be found and obtained in hard copy and state the URL of the Website where digital copies can be obtained. The Claimant intends that hard copies will be made available at one of the gatehouses at the perimeter of the site and also at the offices of HSF Kramer LLP, and both locations will be stated on the notices; and
- d. Send an electronic message to each of the Facebook accounts of the First to Fourth Defendants stating that a claim has been brought and an application made and providing the URL of the Website where the claim documents can be accessed.
- 13. The Claimant will seek an order from the Court that the measures at paragraphs 12.b 12.d constitute good service of the claim documents, pursuant to CPR 6.15(2).

Fifth Defendant

- 14. The Fifth Defendant is "persons unknown". The Claimant proposes, prior to the hearing of its application, to carry out the steps at paragraphs 12.b and 12.c to bring the claim and application to the attention of such persons unknown who may be in the vicinity of the Power Station site or who may access the Claimant's website to obtain information about the site. Again, the Claimant will seek an order from the Court that these measures constitute good service of the claim documents.
- 15. If an order is made by the Court, the Claimant intends to serve this in the manner described in paragraph 12 (for the First to Fourth Defendants) and 14 (for the Fifth Defendant).

Undertaking in damages

- 16. I cannot think of a situation where someone affected by the injunction sought could suffer loss or damage as a result of it. I am nonetheless authorised on behalf of the Claimant to provide the necessary cross-undertaking to pay any sum that the Court considers appropriate to compensate the Defendants for any loss if it is subsequently determined that the Claimant is not entitled to the order which they seek.
- 17. The Claimant's company accounts filed on 13 September 2024 show a net profit for the financial year ending 31 December 2023 of £427 million (following a net profit of

£1,522 million in the financial year ending 31 December 2022) and net current assets of £1,859 million (following £1,572 million in 2022).

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 Grasme Robertson

GRAEME JAMES ROBERTSON

DATED 18 July 2025

Party Claimant
Name G J Robertson
No. of statement First
Exhibits "GJR1"
Date 18 July 2025

IN THE HIGH COURT OF JUSTICE

Claim no. [

]

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 UKNOWN 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

EXHIBIT "GJR1"

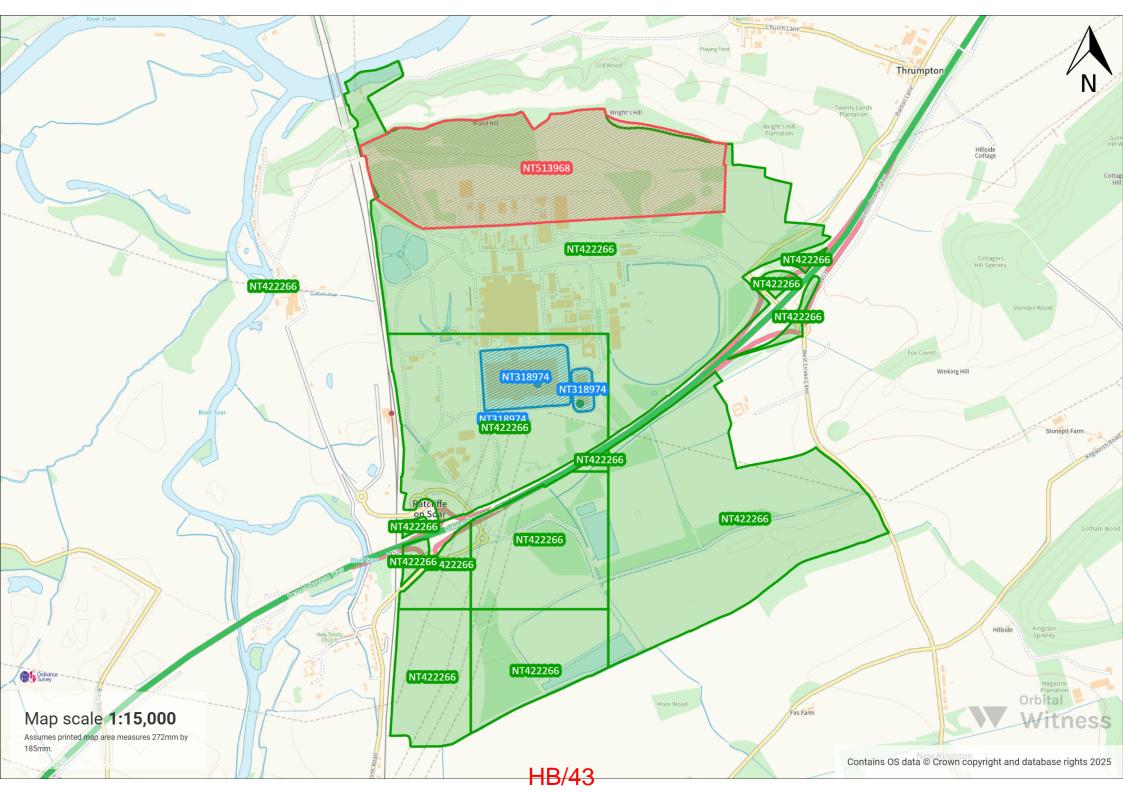
This is the exhibit marked **"GJR1"** referred to in the Witness Statement of **GRAEME JAMES ROBERTSON** dated 18 July 2025.

GRAEME JAMES ROBERTSON

Graeme Robertson

EXHIBIT GJR1 – INDEX

#	Document	Date	Page
1	Plan showing registered titles		3
2	Official Copy (Register) – NT422266	1 July 2025	4
3	Official Copy (Plan) – NT422266	6 June 2024	12
4	Plan showing proposed injunction area		13
5	Official Copy (Register) – SYK708046	17 July 2025	14
6	Official Copy (Register) – NN42715	17 July 2025	17
7	Plan showing proposed notice locations		19



The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number NT422266

Edition date 12.09.2022

- This official copy shows the entries on the register of title on 01 JUL 2025 at 17:45:43.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 01 Jul 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Nottingham Office.

A: Property Register

This register describes the land and estate comprised in the title.

NOTTINGHAMSHIRE : RUSHCLIFFE

- The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land lying to the east of Kegworth Road, Gotham, Nottingham.
- 2 (24.07.2006) The Conveyance of the land tinted blue on the title plan dated 16 July 1951 referred to in the Charges Register contains the following provision:-
 - "IT IS HEREBY DECLARED that the partners and their successors in title shall not be entitled to any aright of light or air or other easement or right in respect of the property hereby conveyed or any part thereof which would in any manner restrict or interfere with the free and unrestricted use of any adjoining or neighbouring land belonging to or vested in the vendor either for building or any other purpose."
- 3 (24.07.2006) The land has the benefit of the rights granted by a Conveyance of the land tinted pink on the title plan dated 17 October 1963 made between (1) Charles Robert Osborne (Vendor) and (2) Central Electricity Generating Board (Purchaser).

NOTE: Copy filed.

4 (24.07.2006) The land has the benefit of the rights granted by a Deed dated 8 November 1965 made between (1) British Railways Board (Grantor) and (2) Central Electricity Generating Board (Grantee).

NOTE: Copy filed.

(24.07.2006) The land has the benefit of the following rights granted by a Conveyance of the land tinted brown on the title plan dated 11 August 1967 made between (1) Peter Melville Garratt (Vendor) (2) William Charles Garratt (Mortgagee) and (3) Central Electricity Generating Board (Purchaser):-

"Together with

all rights of drainage and other easements or quasi-easements (if any)

A: Property Register continued

affecting the same"

6 (24.07.2006) The land has the benefit of the rights granted by a Deed dated 19 September 1967 made between (1) The County Council Of The County Of Nottingham and (2) Central Electricity Generating Board.

NOTE: Copy filed.

7 (24.07.2006) The land has the benefit of the rights granted by a Deed dated 22 April 1970 made between (1) Hilda Morley and (2) Central Electricity Generating Board.

NOTE: Copy filed.

8 (24.07.2006) The land has the benefit of the rights granted by a Deed dated 18 March 1971 made between (1) British Railways Board (2) The Lord Mayor Aldermen And Citizens Of The City Of Nottingham and (3) Central Electricity Generating Board.

NOTE: Copy filed.

9 (24.07.2006) The land has the benefit of the rights granted by a Deed dated 9 December 1988 made between (1) Michael Robert Osborne and Margaret Ellen Osborne (2) The Agricultural Mortgage Corporation Plc and (3) Central Electricity Generating Board.

NOTE: Copy filed.

10 (24.07.2006) The land has the benefit of the rights granted by a Deed dated 31 October 1991 made between (1) Richard Samuel Morley (2) Hilda Morley and (3) Powergen Plc.

NOTE: Copy filed.

- 11 (19.03.2007) The land hatched yellow and edged brown on the title plan has been added to the title.
- 12 (19.03.2007) The added land hatched yellow and edged brown is not included in entries A2 A3 A4 A5 A6 A7 A8 A9 A10 C1 C2 C3 C5 C6 C8 C9 C10 C11 C12 C13 C14 C15 C16 C17 and L1 of this title.
- 13 (19.03.2007) The mines and minerals together with ancillary provisions relating to letting down the surface are excepted from the registration of the land edged brown on the title plan.
- 14 (19.03.2007) There are excluded from the registration of the land hatched yellow on the title plan the mines and minerals excepted by a Conveyance thereof and other land dated 28 May 1951 made between (1) The Honourable Robert Oliver Fitzroy and others (Vendors) and (2) George Fitzroy Seymour in the following terms and the land is also subject to the following ancillary powers of working:-

EXCEPT AND RESERVING unto the Vendors in fee simple:-

- (i) ALL mines and minerals of whatsoever description within and under the property hereby conveyed (subject nevertheless as to coal and mines of coal to the provisions of the Coal Act 1938 and the Coal Industry Nationalisation Act 1946 and to any Act or Acts amending or replacing the same for the time being in force) Together with all necessary or proper powers rights and easements for searching for winning working getting carrying away and making merchantable the same whether by underground or surface workings or both including power to let down the surface whether built upon or not proper compensation being paid to the Purchaser for the occupation of the surface in or about the exercise of such rights and powers provided that all claims for such damage be made in writing to the Vendors or to their agents within six calendar months after the Act is done for which compensation is claimed but not for the damage (if any) which may accrue or be done to the surface of the said property or any part thereof or to any of the erections and buildings standing or being thereon or which may hereafter be erected thereon by reason of the underground working or occupation.
- 15 (19.03.2007) The land hatched yellow on the title plan has the benefit of the rights granted by but is subject to the rights reserved by a Conveyance thereof dated 22 April 1982 made between (1) George Fitzroy

A: Property Register continued

Seymour and (2) Central Electricity Generating Board.

NOTE: Copy filed under NT408444.

16 (19.03.2007) The Conveyance dated 10 October 1986 referred to in the Charges Register contains the following provision:-

"THE Purchaser shall not by virtue of this Conveyance acquire or become entitled to any express or implied easement or right of light or air or support or otherwise or other easement or right whatsoever which would restrict or interfere with the free use and enjoyment by the Vendor and its successors in title or persons deriving title under it or them or any property of the Vendor adjoining or near to the property hereby conveyed and without prejudice to the generality of the foregoing particularly that adjoining or neighbouring land of the Vendor known as Ratcliffe on Soar Power Station (hereinafter referred to as "the Retained land") for building or other purpose or any easement or right to obtain access to the property hereby conveyed over or across the Retained land of the Vendor and the access of light and air to any building or other structure which may hereafter be erected on the property hereby conveyed across the Retained Land shall at all times be deemed to be enjoyed with the Licence and consent of the Vendor or its successors in title to the Retained Land and not as of right the use of the Retained Land adjoining or neighbouring to the property hereby conveyed for any purpose connected with the Vendor's undertaking shall not constitute a breach of the covenants on the part of the Vendor implied herein by Section 76 (i)(A) of the Law of Property Act 1925 or be deemed to be in derogation of the Vendor's grant"

- 17 (01.04.2009) The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.
- 18 (01.04.2009) The land has the benefit of the rights granted by the Conveyance dated 9 December 1963 referred to in the Charges Register.
- 19 (01.04.2009) The land has the benefit of the rights granted by a Transfer of the land edged and numbered NT454402 in green on the title plan dated 5 February 2009 made between (1) E.ON UK plc and (2) Network Rail Infrastructure Limited.

NOTE: Copy filed under NT454402.

20 (16.08.2019) A new title plan showing an amended extent based on the latest revision of the Ordnance Survey Map has been prepared.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (05.11.2015) PROPRIETOR: UNIPER UK LIMITED (Co. Regn. No. 02796628) of Compton House, Unit 2300, The Crescent, Birmingham Business Park, Birmingham B37 7YE.
- 2 (05.11.2015) The price stated to have been paid on 30 September 2015 was £28,000,000 exclusive of VAT.
- 3 (05.11.2015) The Transfer dated 30 September 2015 referred to in the Charges Register contains purchaser's personal covenants.
- 4 (16.11.2021) The proprietor's address for service has been changed.

C: Charges Register

This register contains any charges and other matters that affect the land.

1 (24.07.2006) The land in this title is with other land unknown subject

C: Charges Register continued

to a fee farm rent of £6.50 per annum, a pension of £1 per annum due to York Archbishopric and a pension of 50p per annum due to York Chapter but no further particulars thereof were supplied on first registration.

Parts of the land in this title are informally exonerated from apportioned parts of these payments.

2 (24.07.2006) The land is subject to the matters contained in an Agreement dated 19 May 1926 made between (1) Derbyshire and Nottinghamshire Electric Power Company and (2) Thomas Withers Sheppard.

NOTE: Copy Filed.

3 (24.07.2006) The land is subject to the matters contained in an Agreement dated 3 December 1926 made between (1) Derbyshire and Nottinghamshire Electric Power Company and (2) Thomas Withers Sheppard.

NOTE: Copy filed.

4 (24.07.2006) A Conveyance of the land tinted blue on the title plan dated 16 July 1951 made between (1) The Right Honourable Algernon Henry Baron Belper (2) The Right Honourable Angela Mariota Baroness Belper and Others and (3) John William Elliott and Others contains the following covenants:-

The Partners so as to bind (so far as may be) the land hereby conveyed into whosesoever ands the same may come but so that the Partners shall not be personally liable for a breach of this covenant occurring on or in respect of the land hereby conveyed or any part or parts thereof after they shall have parted with all interest therein hereby jointly and severally covenant with the vendor that the partners and those deriving title under them will at all times observe and perform the following restrictions and stipulations that is to say:
(a) The partners shall not use nor permit nor suffer the use of the property hereby conveyed or any part thereof for any purpose other than that of agriculture as defined by Section 94 of the Agricultural holdings Act 1948 nor shall the partners do nor permit nor suffer to be done upon the property hereby conveyed anything which may be or become a nuisance or annoyance to the vendor or to the tenants or occupiers of the vendor's adjoining or neighbouring land.."

5 (24.07.2006) The land tinted blue on the title plan is subject to the following rights reserved by the Conveyance thereof dated 16 July 1951 referred to above:-

"EXCEPT AND RESERVING unto the vendor out of the conveyance hereby made the right for the vendor and all persons authorised by him at any time hereafter to enter on such part of the property hereby conveyed as is comprised in Ordnance number 88 for the purpose of exercising and enjoying the sporting rights over the adjoining property known as Kingston Spinney."

6 (24.07.2006) By an Agreement dated 2 April 1963 made between (1) The Right Honourable Arthur Grey Baron Hazlerigg and others (2) Right Honourable Alexander Ronald George Baron Belper and (3) Elliotts (Farmers) Limited the covenant contained in the Conveyance dated 16 July 1951 was released as therein mentioned.

NOTE: Copy filed.

7 (24.07.2006) By a Deed dated 16 December 1963 made between (1) right Honourable Arthur Grey Baron Hazlerigg and others (2) Right Honourable Alexander Ronald George Baron Belper and (3) Central Electricity Generating Board the covenant contained in the Conveyance dated 16 July 1951 referred to above was varied as therein mentioned.

NOTE: Copy filed under NT196711.

8 (24.07.2006) The land is subject to the following rights reserved by a Conveyance of the land hatched mauve on the title plan dated 24 January 1964 made between (1) George Fitzroy Seymour (Vendor) and (2) Central Electricity Generating Board (Purchaser):-

"Except and Reserving unto the Vendor and his successors in title and

C: Charges Register continued

the persons deriving title under him or them owners or occupiers for the time being of the said adjoining land on the west side of the land hereby conveyed and his and their tenants servants visitors and others a reasonable access at all times and for all purposes through and over the land hereby conveyed to such adjoining land."

9 (24.07.2006) The land is subject to the following rights reserved by a Conveyance of the land tinted yellow on the title plan dated 29 September 1964 made between (1) Hilda Morley (Vendor) and (2) Central Electricity Generating Board (Purchaser):-

"The Purchaser hereby grants unto the vendor and the persons deriving title under her owners or occupiers for the time being of the remaining parts of Redhill Farm Ratcliffe-on-Soar aforesaid the right in time of flood to pass and repass with or without vehicles and animals over and along the roadway eight feet in width constructed by the purchaser over O.S. Number 106."

10 (24.07.2006) By a Deed dated 14 December 1964 made between (1) Charles Robert Osborne and (2) Central Electricity Generating Board the right of way referred to in the Conveyance dated 17 October 1963 referred to above was released and re granted as therein mentioned.

NOTE: Copy filed.

11 (24.07.2006) By a Deed of Release dated 3 October 1970 made between (1) David Basil Harman Warner and Edward Stephen Cazalet and (2) Central Electricity Generating Board the covenant contained in the Conveyance dated 16 July 1951 referred to above was varied as therein mentioned.

NOTE: Copy filed.

12 (24.07.2006) The land is subject to the matters contained in a Licence to Retain Assets dated 30 March 1990 made between (1) The Central Electricty Generating Board and (2) The East Midlands Electricity Board.

NOTE: Copy filed.

13 (24.07.2006) The land is subject to the rights contained in an Interface Agreement dated 31 March 1990 made between (1) The National Grid Company and (2) Powergen Plc.

NOTE: Copy filed.

14 (24.07.2006) The land is subject to the rights contained in a Deed dated 31 March 1990 made between (1) Powergen Plc and (2) The National Grid Company Plc.

NOTE: Copy filed.

15 (24.07.2006) The land is subject to the rights an Agreement dated 16 June 2004 made between (1) Central Networks East Plc and (2) Midland Mainline Limited.

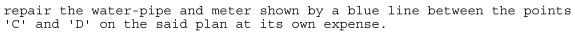
NOTE: Copy filed.

- 16 (18.09.2006) The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.
- 17 (19.03.2007) The land edged brown is included in the Conveyance dated 16 July 1951 and Deed dated 16 December 1963 referred to above.
- 18 (19.03.2007) The land edged brown on the title plan is subject to the following rights reserved by a Conveyance thereof dated 10 October 1986 made between (1) Central Electricity Generating Board (Vendor) and (2) Joniroke Enterprises Limited (Purchaser):-

"THE Vendor reserves the right to divert and relay and reconnect at its own cost and expense the water pipe between the points marked 'C' and 'D' on the plan annexed hereto to such other position as often as necessary but always connecting into the supply to the property hereby conveyed known as Winking Hill Farm.

5. THE Purchaser hereby covenants with the Vendor to maintain and

C: Charges Register continued



.....

THERE IS EXCEPTED and reserved out of the property hereby conveyed the following unto the Vendor and its successors in title owner or occupier for the time being of the Retained land or any parts thereof.

.....

Without prejudice to the generality of the exception and reservation last hereinbefore mentioned in (c) above there shall be excepted and reserved unto the Vendor the right to maintain repair cleanse renew alter and remove all drains pipes wires cables and works on or over the property hereby conveyed for the benefit of the Retained land together with the right for the Vendor with or without workmen and others at all reasonable times to enter upon the said property hereby conveyed for all or any of the purposes aforesaid Together also with the right for the Vendor and its successors in title with or without workmen and others at all reasonable times to enter upon the said property for the purpose of maintaining repairing renewing or altering any fences walls banks abutments or retaining walls and other works of the Vendor on its adjoining or neighbouring land the Vendor making good any damage occasioned to the property hereby conveyed the exercise of the rights of entry hereby reserved.

(f) The full right and liberty to use the said Retained Land for any purposes connected with an electricity undertaking notwithstanding that in consequence of such user any nuisance (whether by noises (howsoever transmitted) smell vibration dust or otherwise howsoever) or any inconvenience or annoyance may be created on the said Retained Land or any part thereof"

NOTE: Copy plan filed under NT196711.

- 19 (19.03.2007) A Transfer of the land edged brown on the title plan dated 12 August 1991 made between (1) Joniroke Enterprises Limited (Vendor) and (2) Powergen PLC (Purchaser) contains covenants details of which are set out in the schedule of restrictive covenants hereto.
- 20 (01.04.2009) A Conveyance of the land tinted mauve on the title plan and other land dated 9 December 1963 made between (1) Gyproc Limited and (2) Central Electricity Generating Board contains restrictive covenants.

NOTE: Copy filed.

21 (22.01.2013) The land is subject to the rights granted by a lease dated 27 December 2012 of part of Ratcliffe Power Station for a term from and including 1 December 2012 to and including 29 May 2015.

¬Note: Copy lease filed.

22 (01.07.2013) The land is subject to the rights granted by a Deed dated 19 June 2013 made between (1) E.ON UK Plc and (2) National Grid Electricity Transmission Plc.

The said Deed also contains restrictive covenants by the grantor.

NOTE: Copy filed.

23 (27.05.2015) The land is subject to the rights granted by a Deed dated 21 May 2015 made between (1) E On UK plc and (2) Western Power Distribution (East Midlands) plc.

The said Deed also contains restrictive covenants by the grantor.

NOTE:-Copy filed.

24 (27.05.2015) The land is subject to the rights granted by a Deed dated 21 May 2015 made between (1) E On UK plc and (2) Western Power

Title number NT422266

C: Charges Register continued

Distribution (East Midlands) plc.

The said Deed also contains restrictive covenants by the grantor.

NOTE:-Copy filed.

25 (05.11.2015) The land is subject to the matters as therein mentioned in a Transfer of the land in this title dated 30 September 2015 made between (1) E.ON UK PLC and (2) Uniper UK Limited.

NOTE: Copy filed.

26 (25.05.2017) By a Deed dated 15 May 2017 made between (1) Uniper UK Limited and (2) National Grid Electricity Transmission PLC the terms of the lease dated 31 March 1990 referred to in the schedule of leases hereto were varied.

NOTE: Copy Deed filed under NT318974.

Schedule of restrictive covenants

The following are details of the covenants contained in the Transfer dated 12 August 1991 referred to in the Charges Register:-

"The Purchaser hereby covenants for itself and its successors in title for the benefit and protection of the Vendor's retained land shown edged green on the Plan as follows:-

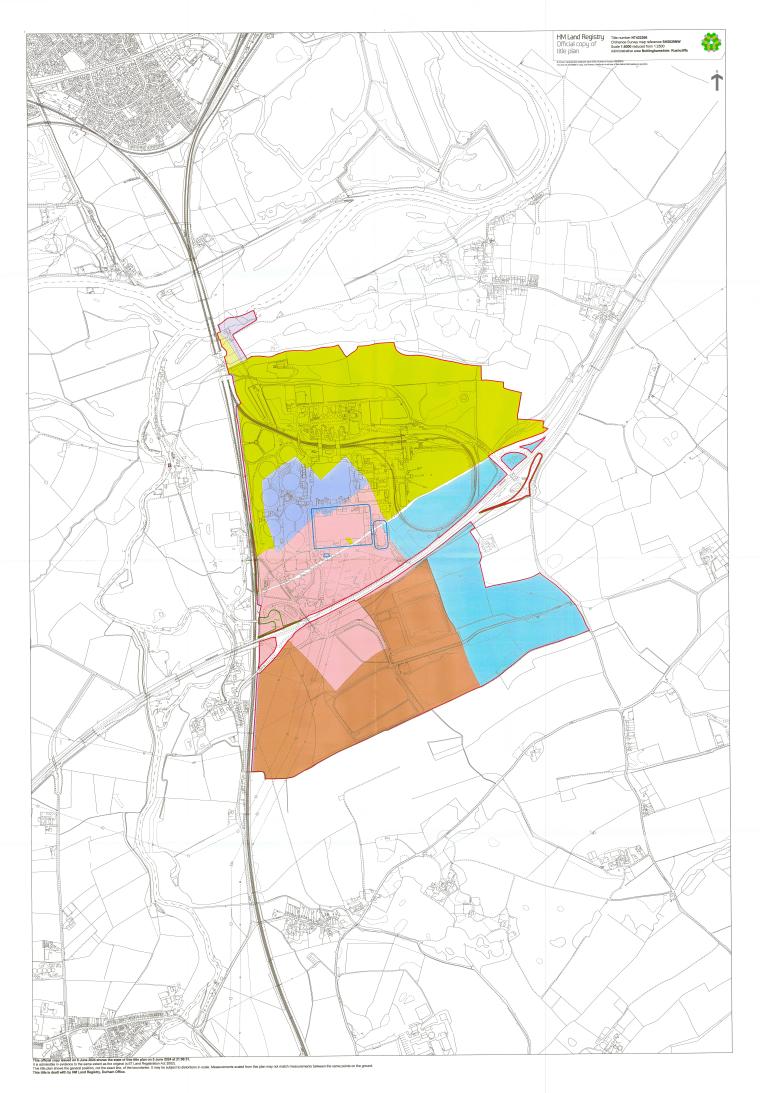
- (i) Not to use or develop the Property for any purpose other than highway works or for purposes connected with the operation of the Purchaser's Ratcliffe on Soar Power Station or for the laying of conducting media and
- (ii) Not to erect any building on the Property save for temporary buildings during the carrying out of such highway or other works permitted by this clause."

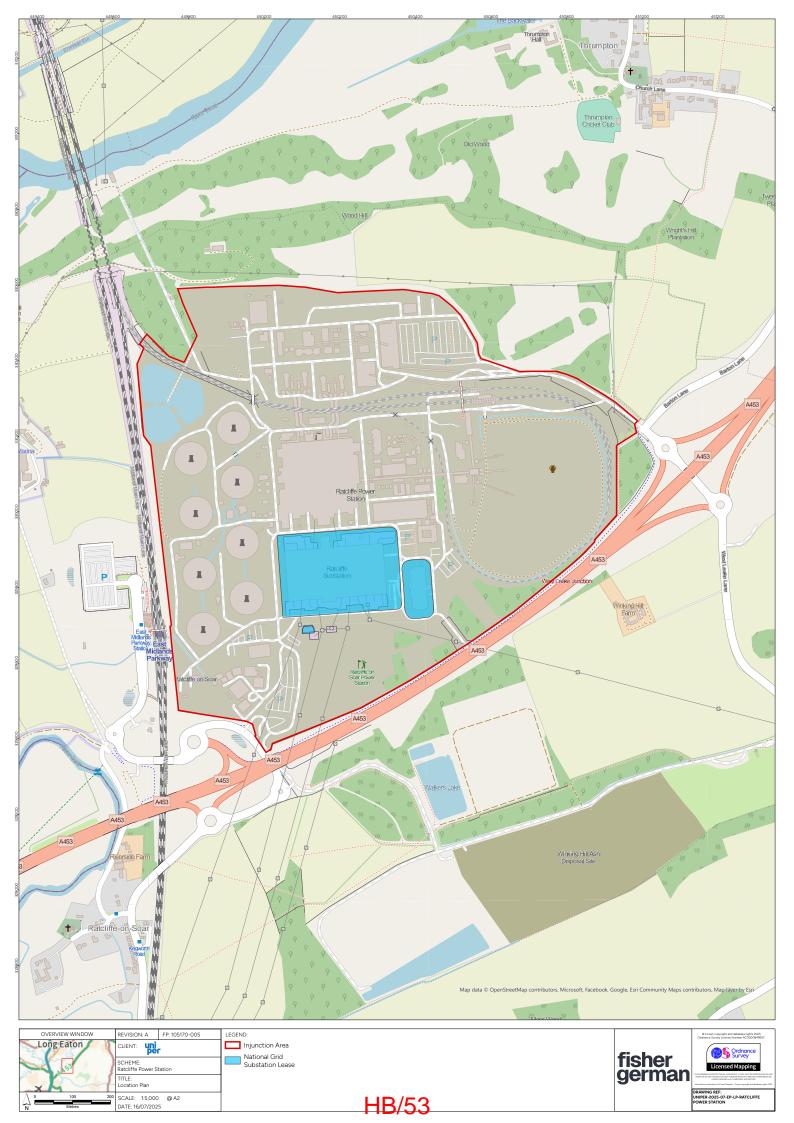
NOTE: The Vendor's retained land referred to lies to the south of the land in this title.

Schedule of notices of leases

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	24.07.2006 edged blue	as described in the lease	31.03.1990 999 years from 31.3.1990	NT318974
	NOTE: See entry dated 15 May 20	in the Charges Register relat 17	ing to a Deed of	variation

End of register





The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number SYK708046

Edition date 23.03.2023

- This official copy shows the entries on the register of title on 03 JUL 2025 at 21:48:32.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 03 Jul 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Nottingham Office.

A: Property Register

This register describes the land and estate comprised in the title.

SOUTH YORKSHIRE : DONCASTER

- 1 (07.04.2009) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being 139 Wike Gate Road, Thorne, Doncaster (DN8 5JH).
- 2 (23.03.2023) The Transfer dated 13 February 2023 referred to in the Charges Register was made pursuant to Part V of the Housing Act 1985 and the land has the benefit of and is subject to such legal easements as are granted and reserved in the said Deed and the easements and rights specified in paragraph 2 of Schedule 6 of the said Act.
- 3 (23.03.2023) The Transfer dated 13 February 2023 referred to above contains a provision as to boundary structures.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (23.03.2023) PROPRIETOR: DIANE SEVERN of 139 Wike Gate Road, Thorne, Doncaster DN8 5JH.
- 2 (23.03.2023) The price stated to have been paid on 13 February 2023 was £57,750.
- 3 (23.03.2023) RESTRICTION: No transfer or lease of the registered estate dated before 13 February 2033 by the proprietor of the registered estate or by the proprietor of any registered charge is to be completed by registration unless accompanied by
 - (a) a certificate given by City of Doncaster Council that the transfer or lease complies with the requirements of section 156A of the Housing Act 1985 or that the transfer or lease is an exempted disposal or is not a relevant disposal, or
 - (b) a certificate given by the local housing authority for the area in

B: Proprietorship Register continued

which the property is situated that (i) City of Doncaster Council is no longer in existence and (ii) the transfer or lease complies with the requirements of section 156A of the Housing Act 1985 or is either an exempted disposal or is not a relevant disposal.

4 (23.03.2023) RESTRICTION: No disposition of the registered estate by the proprietor of the registered estate is to be registered without a written consent signed by the proprietor for the time being of the Charge dated 13 February 2023 in favour of Earl Shilton Building Society referred to in the Charges Register.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (07.04.2009) The deeds and documents of title having been lost the land is subject to such restrictive covenants and easements as may have been imposed thereon before 7 April 2009 and are still subsisting and capable of being enforced.
- 2 (23.03.2023) A Transfer of the land in this title dated 13 February 2023 made between (1) City Of Doncaster Council and (2) Diane Severn contains restrictive covenants.

NOTE: Copy filed.

- 3 (23.03.2023) REGISTERED CHARGE dated 13 February 2023.
- 4 (23.03.2023) Proprietor: EARL SHILTON BUILDING SOCIETY of 22 The Hollow, Earl Shilton, Leicester LE9 7NB.
- 5 (23.03.2023) Charge subsisting until 12 March 2028 having the priority specified in section 156 of the Housing Act 1985 to secure the liability under the covenant to repay discount contained in the Transfer dated 13 February 2023 referred to above.

End of register

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number NN42715

Edition date 16.04.2025

- This official copy shows the entries on the register of title on 17 JUL 2025 at 19:33:18.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 17 Jul 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Leicester Office.

A: Property Register

This register describes the land and estate comprised in the title.

WEST NORTHAMPTONSHIRE

- 1 (10.07.1978) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being 11 Grove Road, Northampton (NN1 3LH).
- 2 A Transfer of the land in this title dated 16 June 1978 made between (1) John William Beasley and Patricia Mildred Beasley and (2) Northampton Borough Council contains the following provision:-

"TOGETHER with the undivided moiety of the house and garden walls between the property hereby transferred and the adjoining property No. 13 Grove Road aforesaid which are party walls"

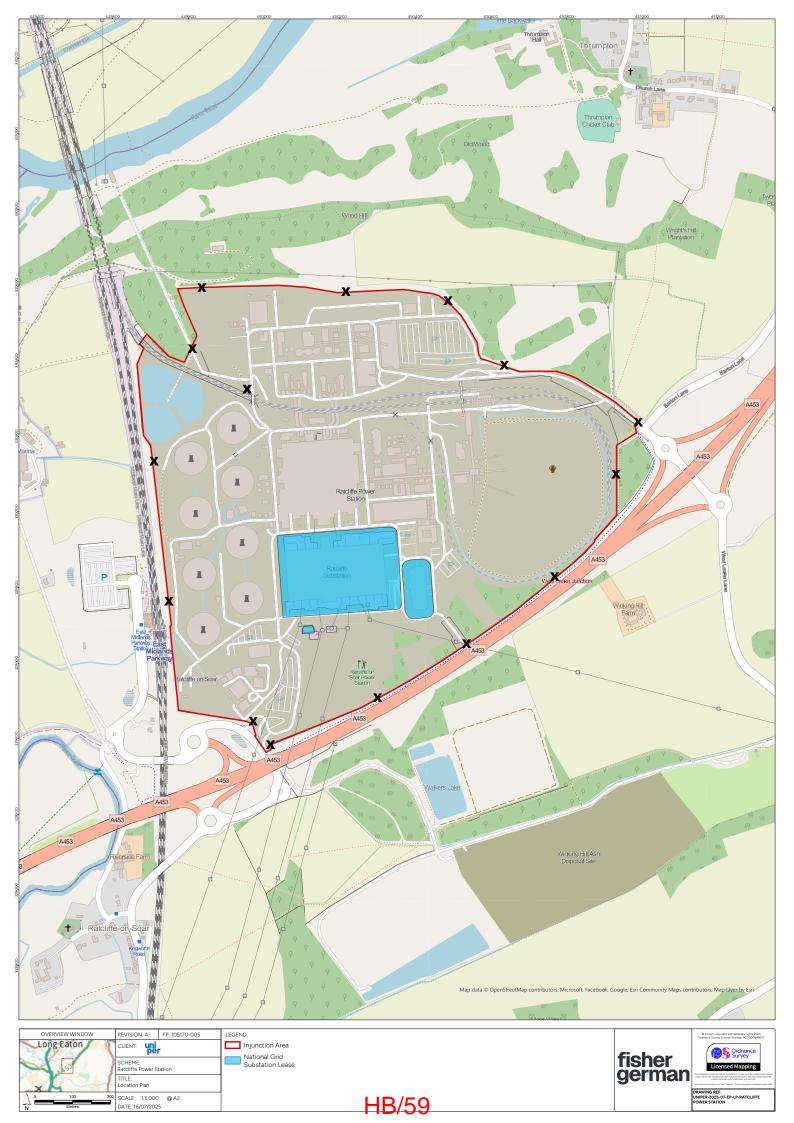
B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (06.04.2000) PROPRIETOR: MICHAEL CARREA of 11 Grove Road, Northampton NN1 3LH.
- 2 (06.04.2000) The price stated to have been paid on 30 March 2000 was £58,500.

End of register



Party Name of Witness No. of statement Exhibits Date

Claimant S F Close First "SC1" 21 July 2025

IN THE HIGH COURT OF JUSTICE

Claim no. [

1

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 THE PARTICULARS OF CLAIM) WITHOUT THE CONSENT OF THE CLAIMANT

Defendants

WITNESS STATEMENT OF STEPHEN FOSTER CLOSE

- 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

GBR01/122136358_1

- 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.
- 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		
SC1/12	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.		
SC1/13,	25 April 2025 – 18:52		
14	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 (" FGD ") plant. The majority of the group pictured appear to be men, but children are also visible.		

SC1/15-25 April 2025 – 21:50-52 17 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. SC1/18 29 April 2025 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. SC1/19, 29 April 2025 20 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. SC1/21 29 April 2025 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. SC1/22 29 April 2025 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

unwind and remove the copper wiring. A significant quantity of the grey material described above is also shown strewn across the area of hardstanding.

SC1/23 29

29 April 2025

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.

SC1/24-

29 April 2025

27

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.

SC1/28

29 April 2025

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.

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;
 - 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 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.
- 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 Barter¹ [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 photo² 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

¹ https://www.facebook.com/joshua.barter.54

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

- to be the Power Station). His profile picture³ is him sitting in the (seemingly abandoned) control room of what appears to also be a power station.
- 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 18:43⁴ [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)⁵ [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 2025⁶ **[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

GBR01/122136358_1 14

^{3 &}lt;u>https://www.facebook.com/photo/?fbid=1808928049482570&set=a.110136046028454</u>

https://www.facebook.com/joshua.barter.54/posts/pfbid0QUTUa2SDsb6eVHZ4tv8pmvKMZguCq1ZMWNUYH1HK11iXKynx6KhYBN5HuZkHsaCGI

https://www.facebook.com/joshua.barter.54/posts/pfbid02z2oHSkRTqkyFeiCWKyZ75MyCfnKSrRGSHK4eh7TnhxxVqCjRNnPDsdpe61LZNp6al

⁶ 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 660".

- 47. In a separate video also posted on 13 April 2025⁷ (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 20258 [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 2025⁹ 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 "lan", and so I consider may be Mr Johnson)

HB/74

https://www.facebook.com/joshua.barter.54/videos/685023223926635

https://www.facebook.com/joshua.barter.54/videos/677363694904785

^{9 &}lt;u>https://www.facebook.com/joshua.barter.54/videos/1132980044677323</u>

- 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. (a) (a) "[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

- 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.
- 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	Stephen Close
	STEPHEN FOSTER CLOSE
DATED	21st July 2025

Party Claimant
Name S F Close
No. of statement First
Exhibits "SC1"
Date 21 July 2025

IN THE HIGH COURT OF JUSTICE Claim no. [
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 UKNOWN 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

EXHIBIT "SC1"

This is the exhibit marked "SC1" referred to in the Witness Statement of STEPHEN FOSTER CLOSE dated 21 July 2025.

58363619E14F45D...

STEPHEN FOSTER CLOSE

Signed by:

EXHIBIT SC1 – INDEX

#	Document	Date	Page
1	BBC news article on Power Station shutting down	27.09.25	6 - 9
2	Photograph of Power Station		10
3	Aerial image of Power Station		11
4	Photo of arrival of Vehicles	25.04.25	12
5	Photo of encampment	25.04.25	13
6	Photo of close up of individuals forming encampment	25.04.25	14
7	Photo of individual with large bag, returning to encampment	25.04.25	15
8	Photo of camp on site and individual carrying materials to vans	25.04.25	16
9	Photo of vehicle being driven through site	25.04.25	17
10	Photo of staff changing area in disarray	29.04.25	18
11	Photo of staff office in disarray	29.04.25	19
12	Photo of 2 nd staff office in disarray	29.04.25	20
13	Photo of damaged vehicle and grey material	29.04.25	21
14	Photo of detached copper core of electricity transformer	29.04.25	22
15	Photo of excavator with door open	29.04.25	23
16	Photo of damage to cabling and cable trays on pipe bridge	29.04.25	24
17	Photo of damage to cabling and cable trays on pipe bridge	29.04.25	25

18	Photo of damage to cabling and cable trays on pipe bridge	29.04.25	26
19	Photo of damage to cabling and cable trays on pipe bridge	29.04.25	27
20	Photo of straps tied to cabling	29.04.25	28
21	Photo of security measures taken immediately after incursion	29.04.25	29
22	Photo of access barrier bent	27.06.25	30
23	Photo of access barrier broken off	27.06.25	31
24	Photo of hostile vehicle mitigation block with chain attached	27.06.25	32
25	Photo of hostile vehicle mitigation block with drag tracks	27.06.25	33
26	Photo of damage to gate	27.06.25	34
27	Photo of travellers forcing barrier out of place	26.06.25	35
28	Photo of van forcing gate open	26.06.25	36
29	Photo of travellers passing through outer gate	26.06.25	37
30	Photo of van dragging hostile vehicle mitigation block	26.06.25	38
31	Photo of van dragging second hostile vehicle mitigation block	26.06.25	39
32	Photo of vehicles entering	26.06.25	40
33	Photo of police arriving	26.06.25	41
34	BBC news article on traveller encampment at former Vauxhall factory	12.05.25	42 - 43
35	Joshua Barter Facebook profile (accessed 03.07.25)		44

36	Sam Williams Facebook profile (accessed 03.07.25)		45
37	lan Johnson Facebook profile (accessed 03.07.25)		46
38	Joshua Barter social media post and comments	12.06.25	47
39	Joshua Barter at edge of chimney stack	12.06.25	48
40	Joshua Barter in turbine hall + comments	13.04.25	49
41	Screenshot of video walking through Power Station	13.04.25	50
42	Screenshot of video walking through Power Station	13.04.25	51
43	Screenshot of video walking through Power Station	13.04.25	52
44	Facebook comments	25.03.25	53
45	Screenshot of video in West Burton Power Station	10.05.25	54
46	Screenshot of video on roof of power station facility	07.02.25	55
47	Sam Williams compilation of posts		56 - 60
48	Urbex Lost and Found Facebook page (accessed 03.07.25)		61
49	lan Johnson Instagram profile (accessed 03.07.25)		62
50	Urbex Lost and Found posts from inside Power Station (accessed 03.07.25)		63 - 67
51	Luke Badharee Facebook profile (accessed 03.07.25)		68 - 74
52	Luke Badharee updated profile picture in Power Station (accessed 03.07.25)		75
53	Luke Badharee photo of GoPro	30.06.25	76
54	Luke Badharee compilation of posts		77 - 82
55	Abandoned UK Facebook group (accessed 03.07.25)		83 - 88

56	Reddit comments regarding Ratcliffe-on-Soar power station access	12.05.25	89	
57	Screenshot of YouTube video of trespass in power station and comments	30.09.24	90 - 93	





















NEWS

Home | InDepth | Israel-Gaza war | War in Ukraine | Climate | UK | World | Business | Politics | Culture

■ More

England | Local News | Nottinghamshire

UK's last coal-fired power station set to close



Ratcliffe-on-Soar power station in Nottinghamshire has been producing energy since 1967

Alex Smith

BBC News, Nottingham

27 September 2024

The closure of the UK's last coal-fired power station has been described by officials as a "tremendously important milestone" in energy production.

Ratcliffe-on-Soar power station in Nottinghamshire is due to shut early next week, with demolition of the site to follow after decommissioning, which is set to take two years.

The site - a landmark in the East Midlands - has been producing energy since 1967, enough to make more than one billion cups of tea per day.

Mike Lewis, CEO of the site's owner Uniper, told the BBC the closure was a key step in the "global route to decarbonisation".



The power station has loomed large in the lives of the residents of the region

The site - situated off the A453 near the M1 motorway, and adjacent to East Midlands Parkway railway station - has been seen as a landmark for residents in the region for decades.

Neighbours close to the site, which comprises eight cooling towers, **previously told the BBC** the power station had played an important role in their lives.

Construction of the site began in 1963, with the first unit in place four years later, providing power for 57 years.

Ratcliffe has had approximately 141,768 coal deliveries by rail since 1967, with the last coal shipment **taking place on 28 June**.



The power station's final order of coal arrival by rail in June

Mr Lewis, who confirmed plans for a clean energy technology park at the site, said the closure was a "tremendously important milestone in the global route to decarbonisation".

When asked if a future with clean energy and no blackouts is possible, he said "absolutely", adding that solutions are being worked on now.

Mr Lewis said: "What we want to do is decarbonise flexible generation, because you can't run an energy system on renewables alone.

"You need power when the sun doesn't shine and when the wind doesn't blow."



Mike Lewis said plans were in place for a clean energy technology park on the site

Uniper said it had about 350 colleagues and contractors working on site, but added during an outage, this could be as many as 600.

Plant manager Peter O'Grady, from Lincoln, said there would be "a little bit of a celebration" on Tuesday as operations at the site ended.

"It's a major thing - this is the end of coal-fire generation in the UK," he said.

"When I started in the industry, 80% of the UK's power was from coal, and by the end of next week it will be zero and the lights have stayed on."



Plant manager Peter O'Grady joined the industry in 1988

Richard Montgomery, electrical engineer at the station, said "the emotions are building" as the closure nears, while environment team leader Chris Smith added the closure was "a shame".

"We've worked so hard to make it the cleanest, but obviously, given the age of the plant, it's probably about right for us to close and make room for more renewable energy," she said.

Mr O'Grady added: "In terms of decommissioning, we don't see that as ending, we see that as creating a new future."



About 350 Uniper colleagues and contractors work at the site

Get in touch

Tell us which stories we should cover in Nottingham



Follow BBC Nottingham on <u>Facebook</u>, on <u>X</u>, or on <u>Instagram</u>. Send your story ideas to <u>eastmidsnews@bbc.co.uk</u> or via <u>WhatsApp</u> on 0808 100 2210.

Related topics

Ratcliffe on Soar

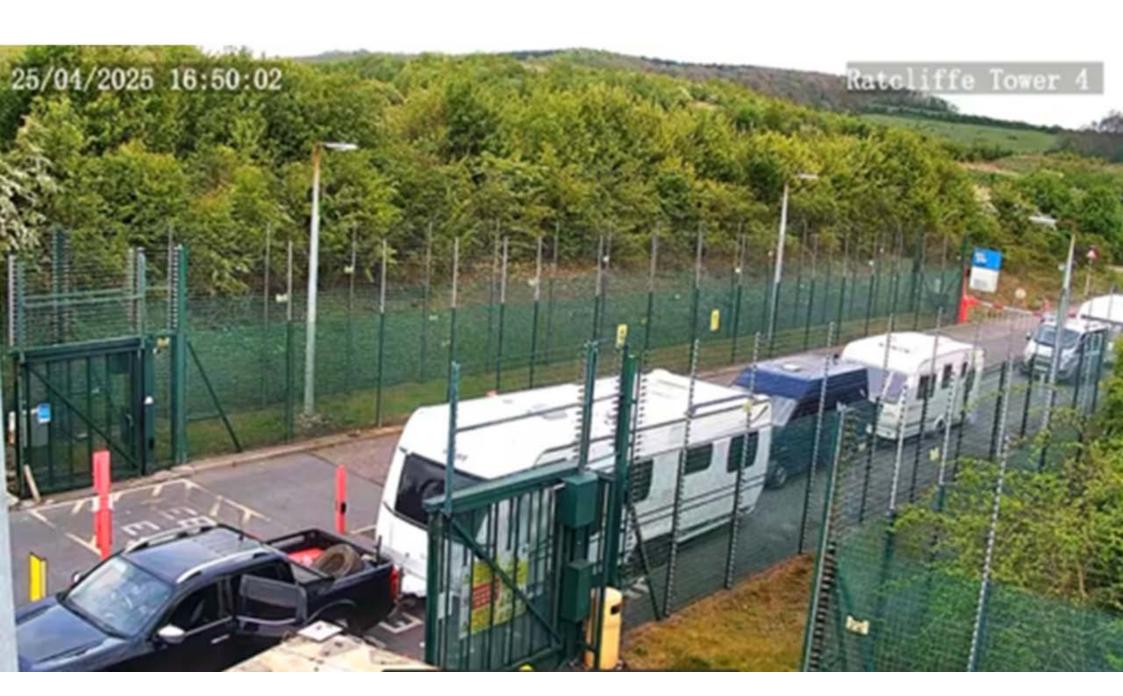
More on this story



As it happened: UK's last coal-fired power station set to close

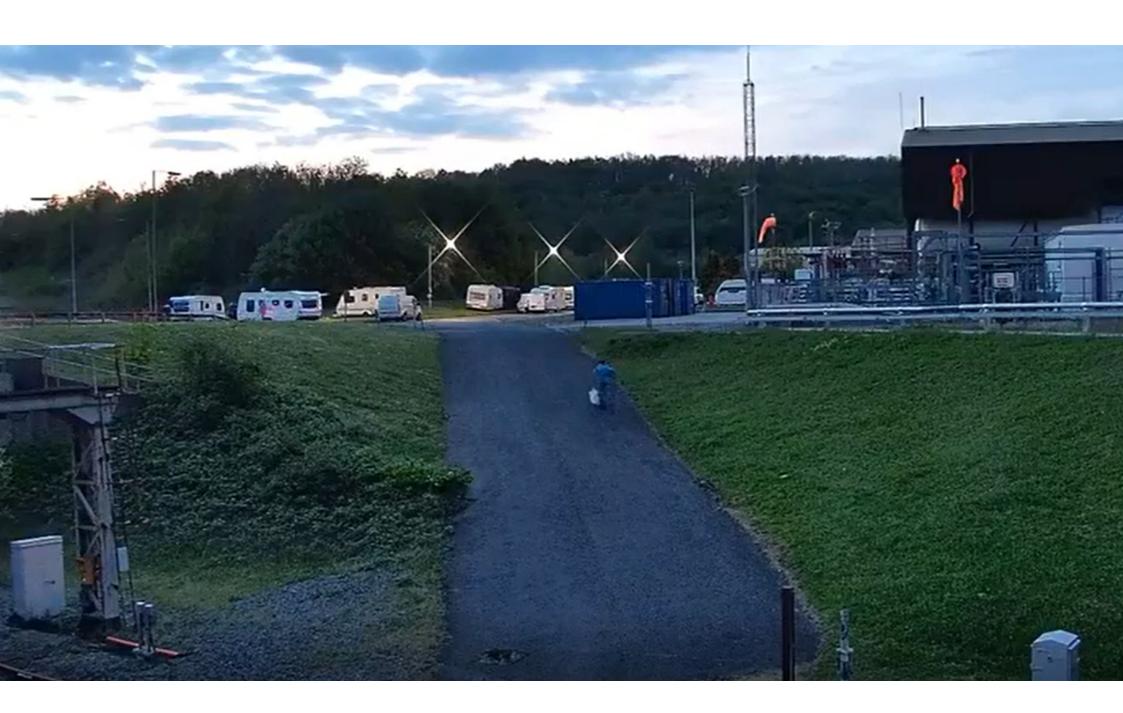


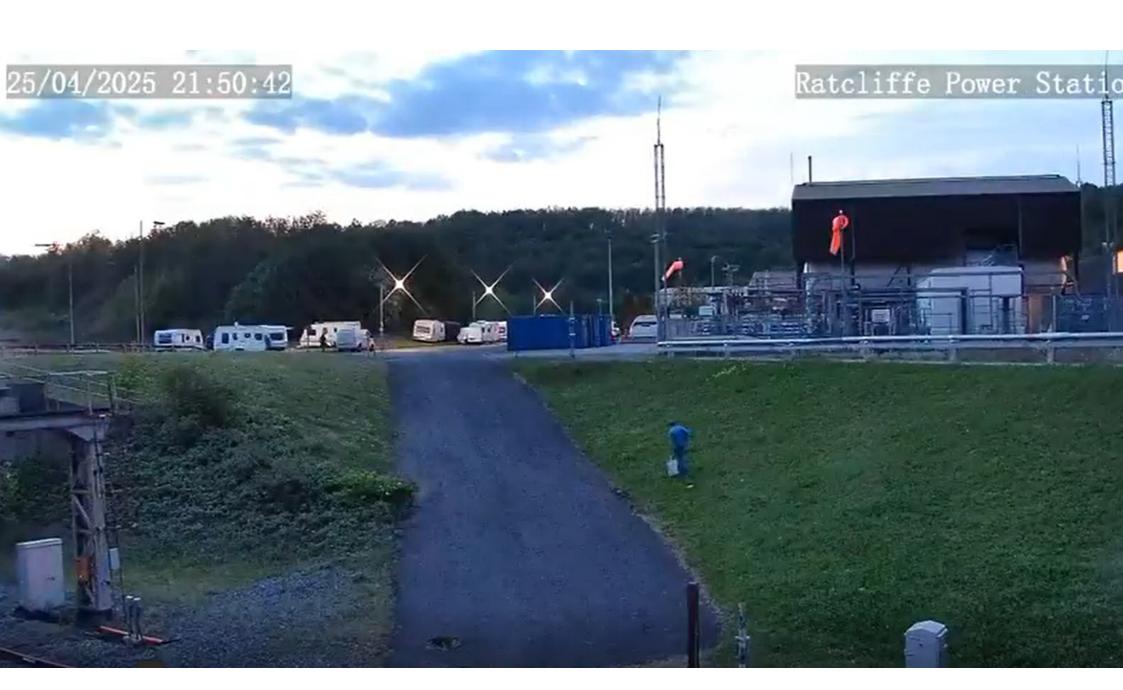
















HB/96



HB/97



HB/98

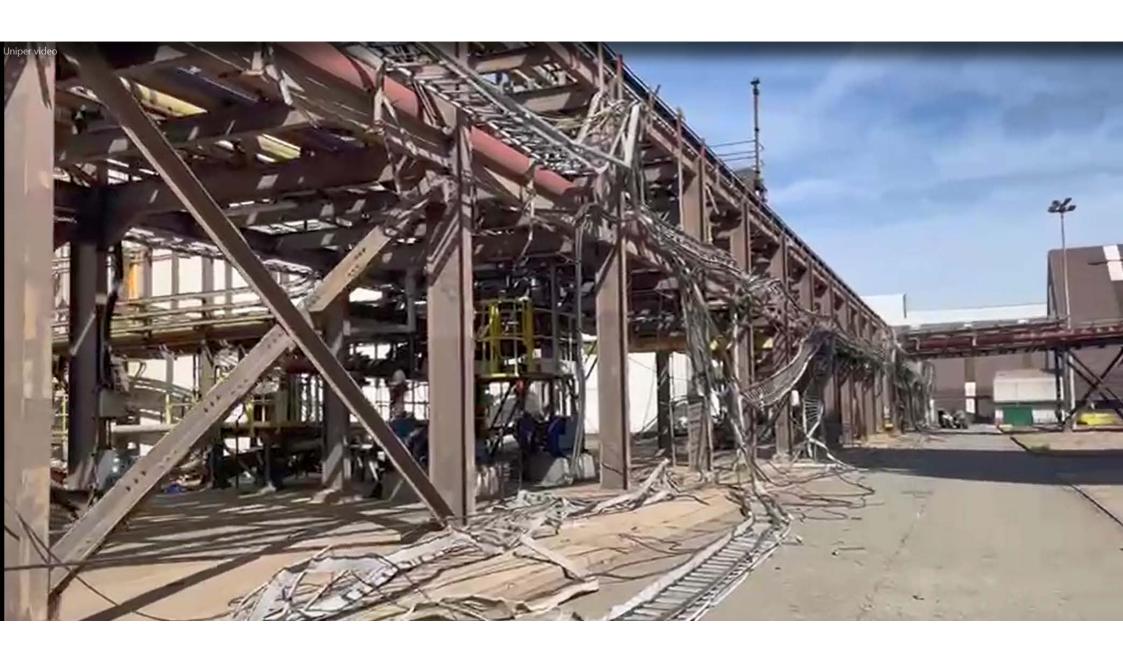


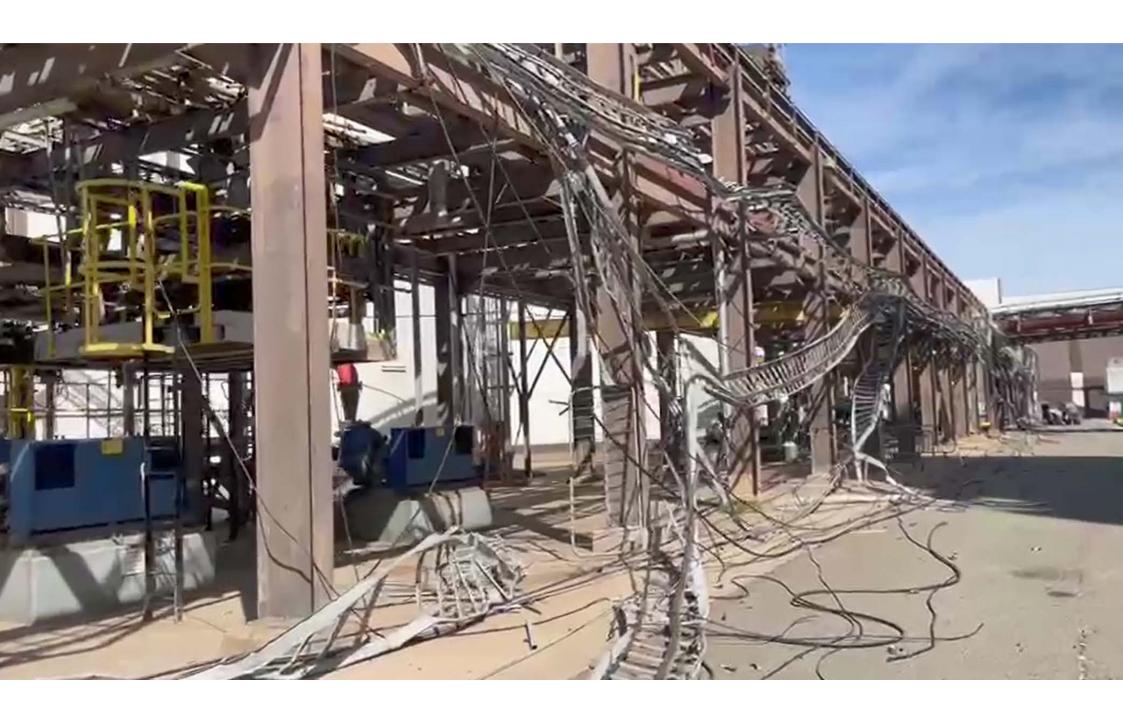


HB/100

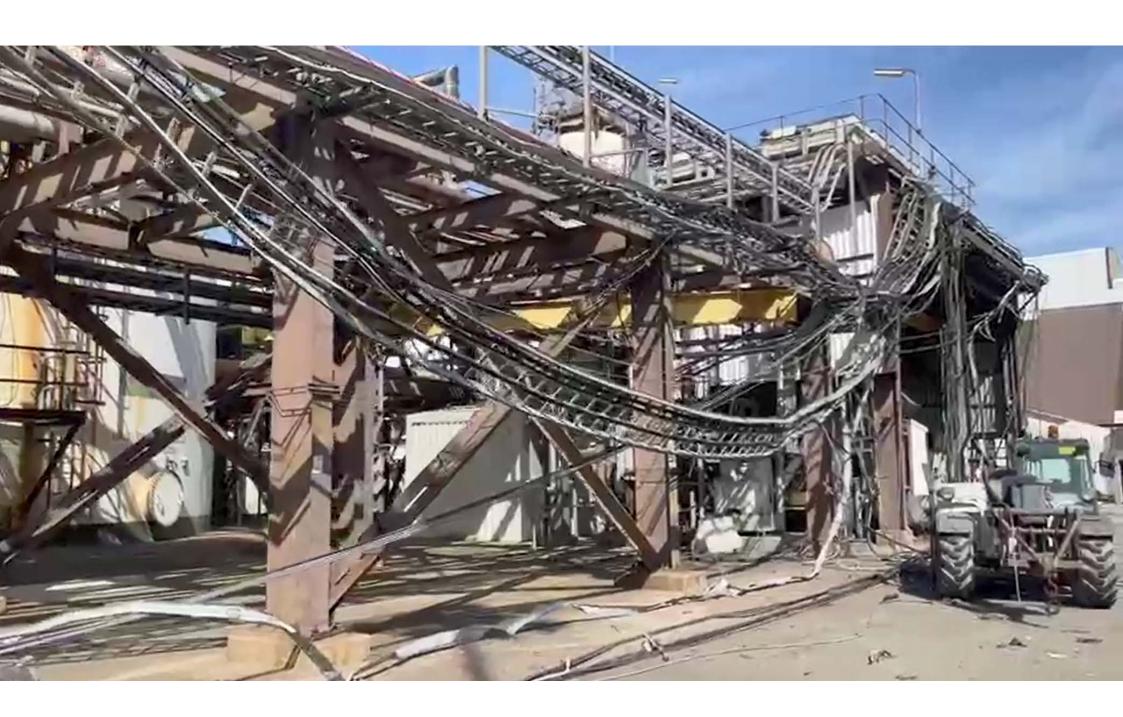


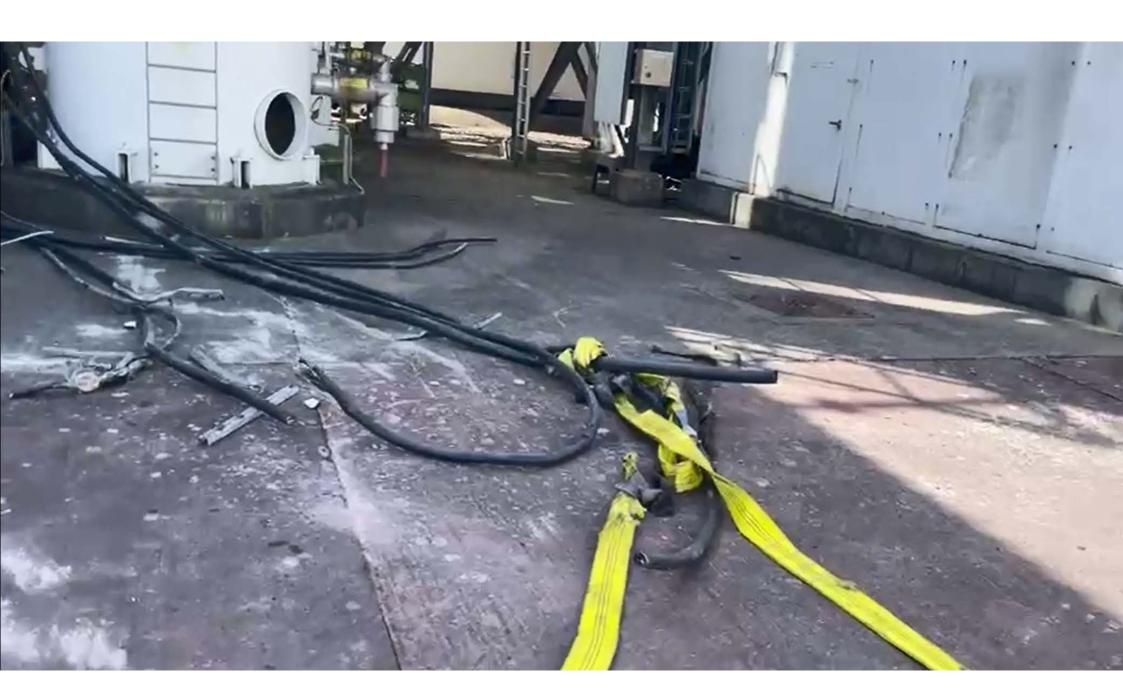
HB/101











Securing the access























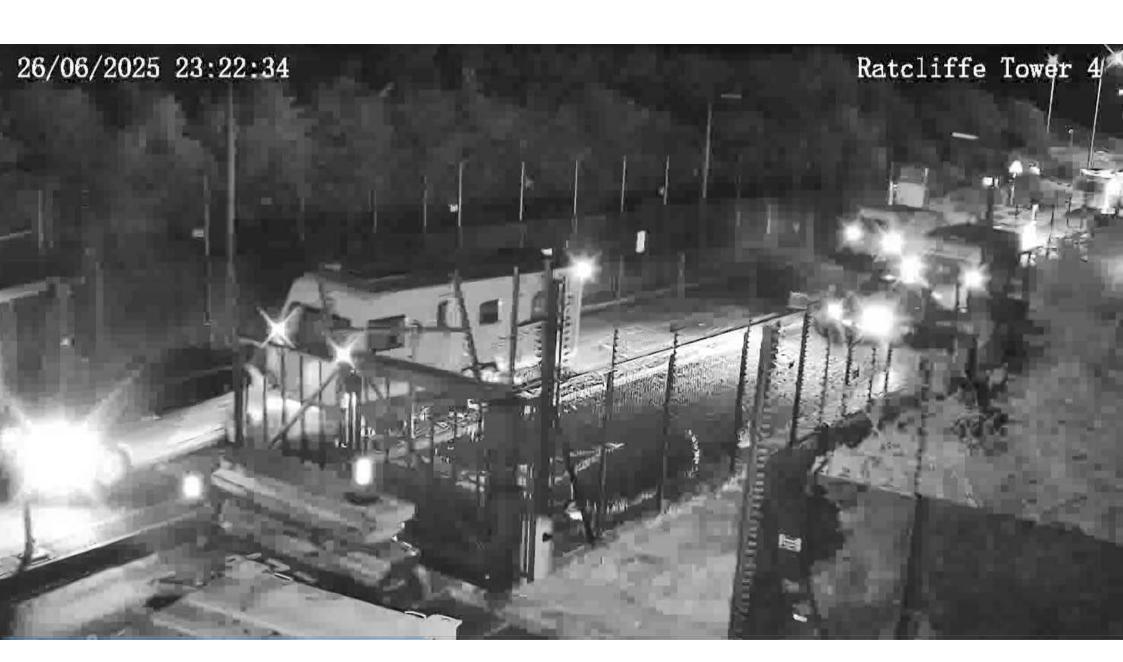




































NEWS

Home | InDepth | Israel-Gaza war | War in Ukraine | Climate | UK | World | Business | Politics | Culture

■ More

England | Local News | Beds, Herts & Bucks

Caravans move on after entering Vauxhall site



Vauxhall owner Stellantis said trespassers gained entry on Friday, 9 May and they departed the following day

Tony Fisher

BBC News, Bedfordshire

12 May 2025

A convoy of caravans and vehicles that gained entry to the Vauxhall site in Luton has been moved on.

In a video posted on Tik Tok, three cars, nine vans, 11 caravans and one truck are seen entering the former van plant at the entrance on Loverose Way off Kimpton Road.

Bedfordshire Police said officers were called to reports of an encampment on private property on Friday.

Officers attended to conduct checks and the encampment was moved on by the following day.



A camera recorded footage of men holding up the barrier while a security guard stands by



Bedfordshire Police said officers were continuing to engage with those affected

In the video, a van towing a caravan drives up to the barrier and a man is seen getting out.

He presses something and the barrier rises while a security guard looks on as the convoy of vehicles enter the site and more figures appear around the security guard's cabin.

Luton Council confirmed that as it happened on private land it was up to the landowner to evict rather than the local authority.

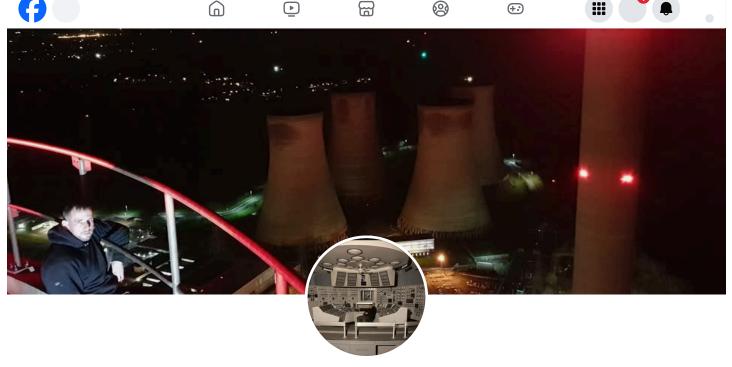
Bedfordshire Police said no police powers were utilised in the process.

Vehicle production at the site $\underline{\text{came to an end in March}}$ after 120 years of being based in the town.

A spokesman for Stellantis, which owns Vauxhall, said security had been increased at the site following the incident.

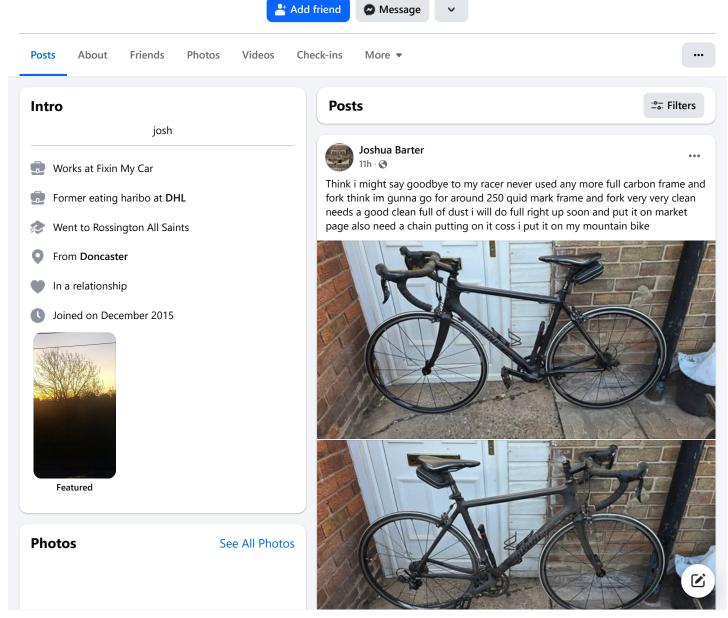
Get in touch

Do you have a story suggestion for Beds, Herts & Bucks?



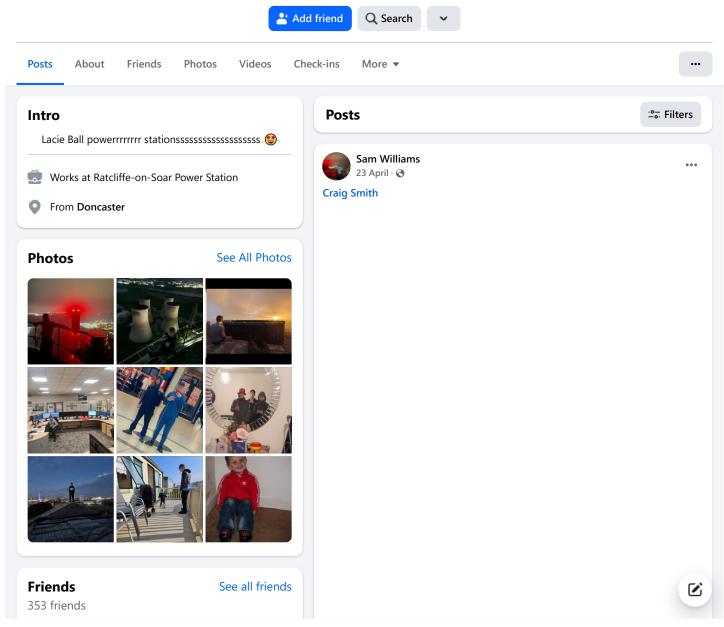
Joshua Barter

945 friends



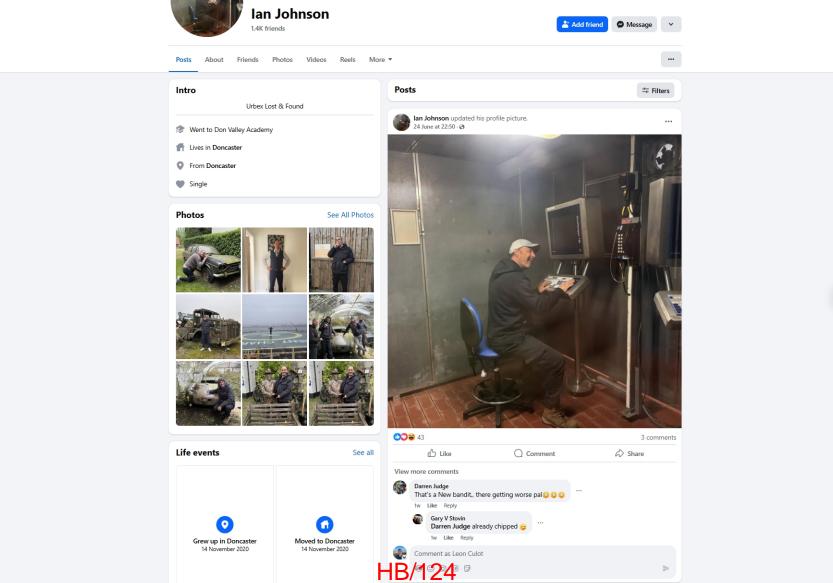


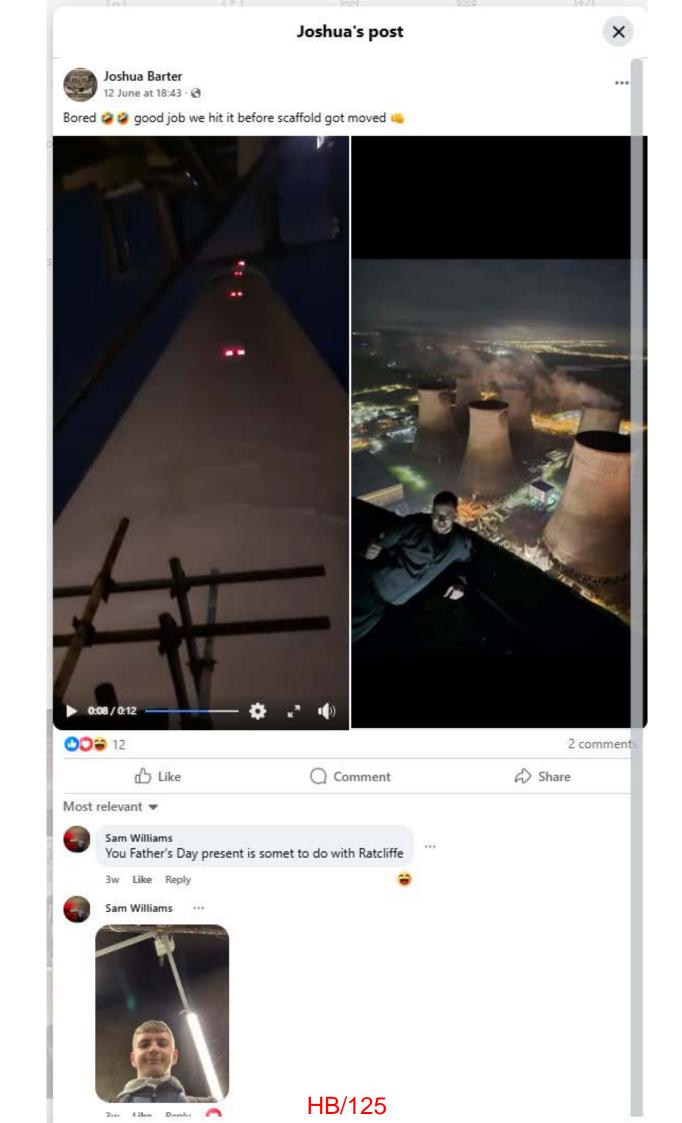
353 friends







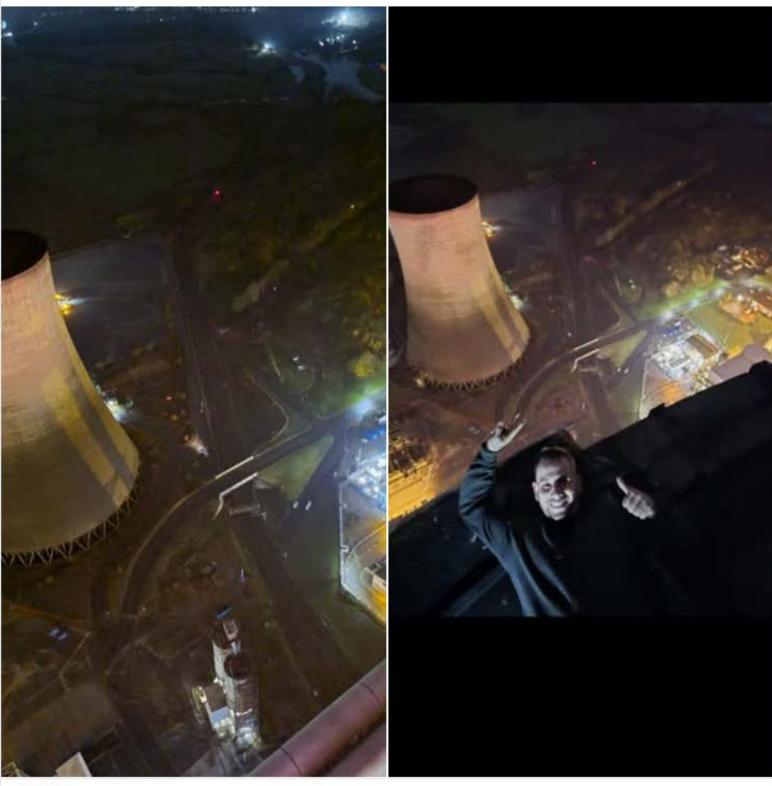






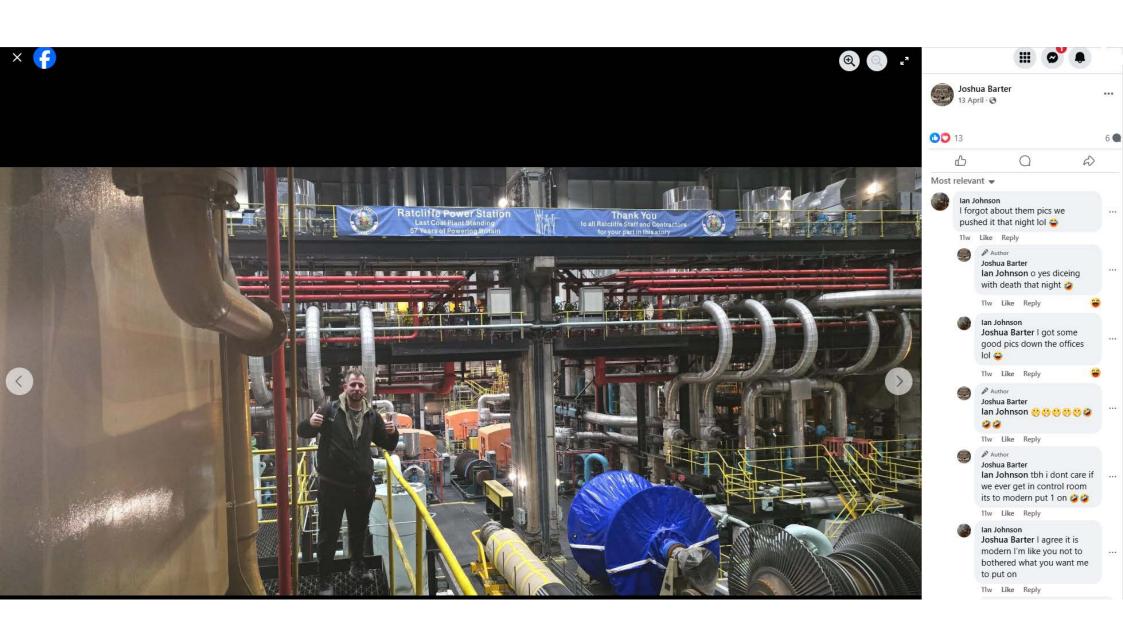
...

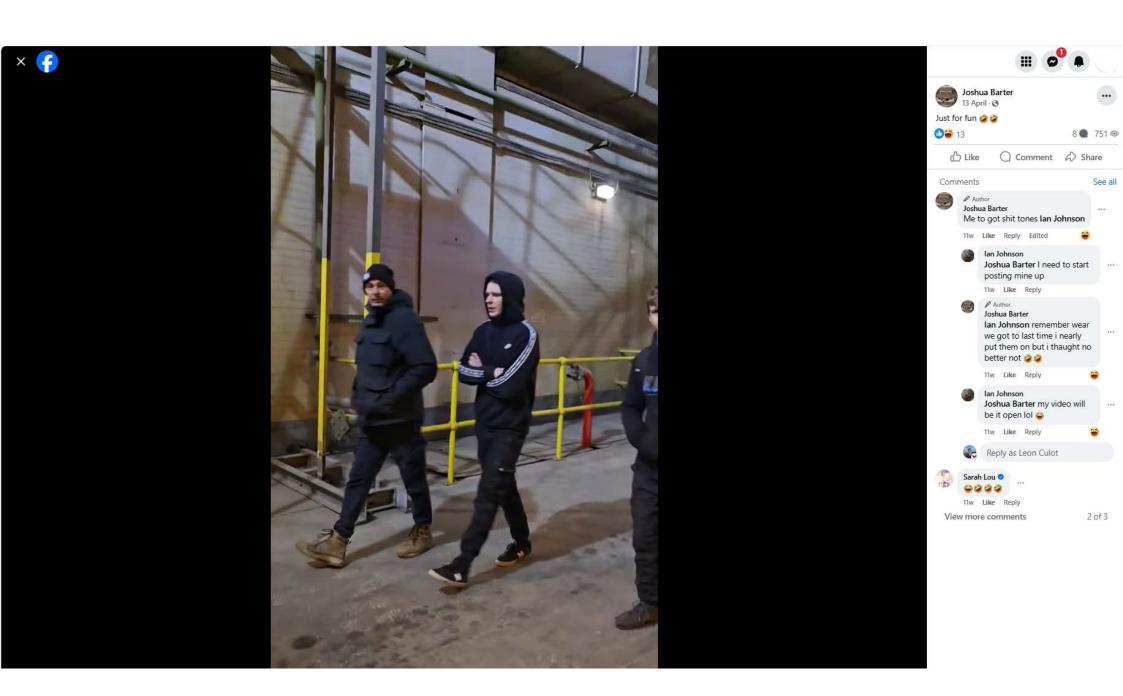
How much does it cost to hire in dog unit security talk about waste of money

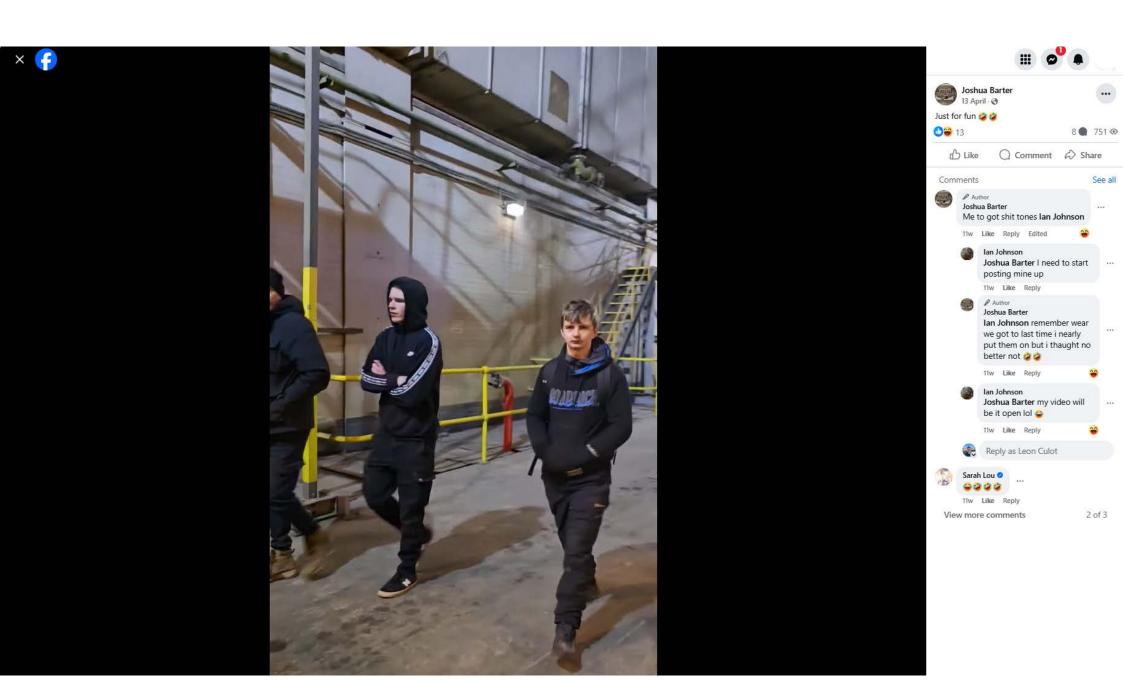




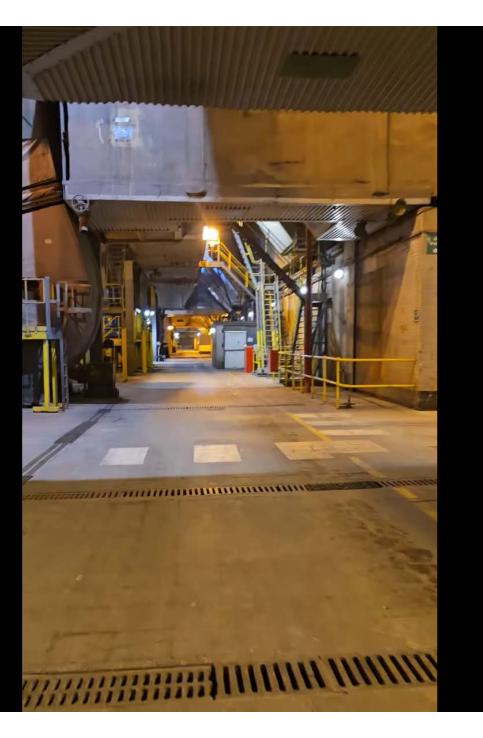
3w **Like** Reply













Joshua Barter's post





Joshua Barter

25 March · @



Ratcliffe with a cold 1 (2) we love exploreing them live (2)





This content isn't available at the moment

When this happens, it's usually because the owner only shared it with a small group of people, changed who can see it, or it's been deleted.



1 comment





Comment



Share

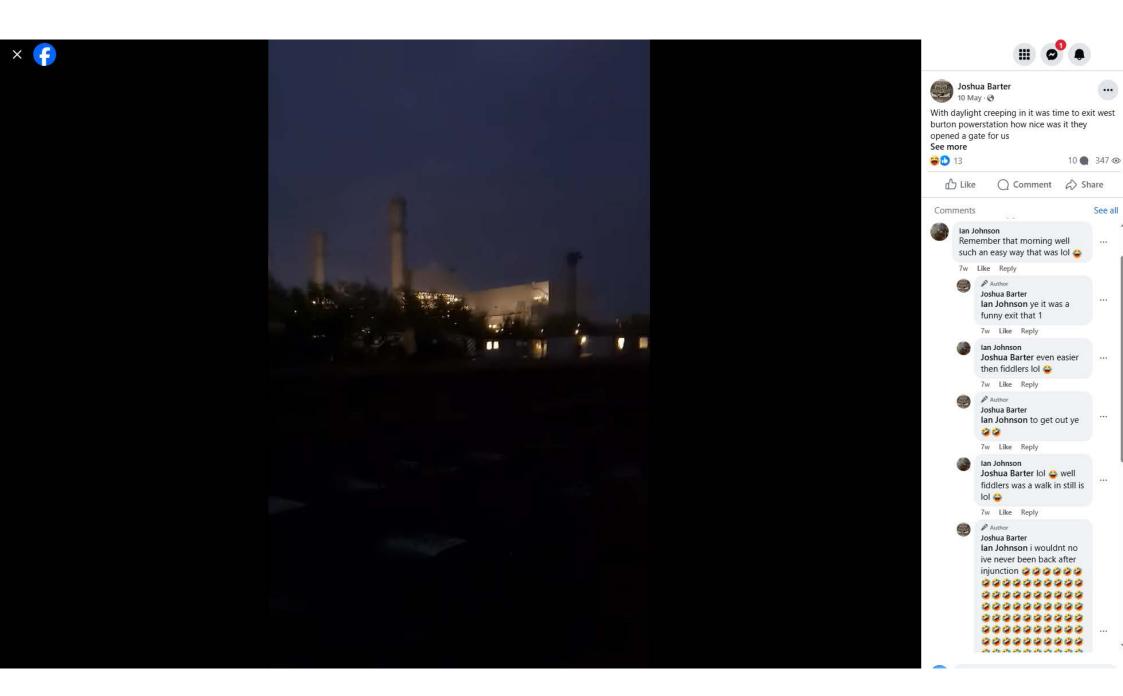
Most relevant •



Sam Williams Abandoned building 😤 🚨

Like Reply 14w







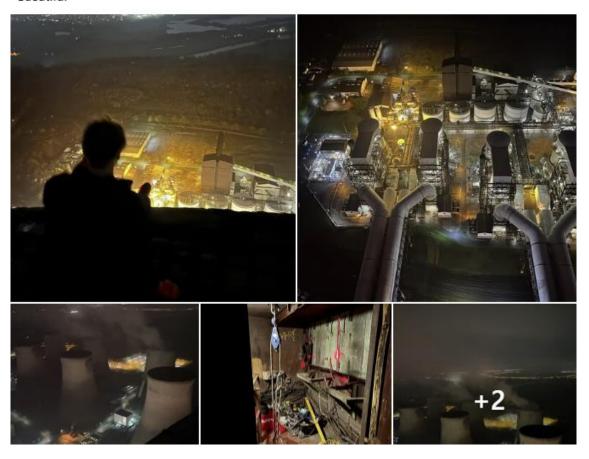






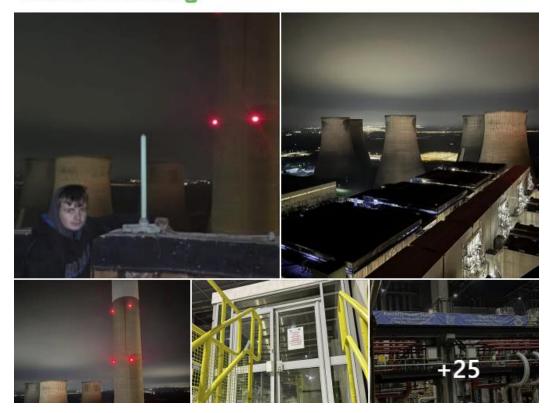
HB/134







Ratcliffe power station,650ft chimney \bigcirc , gas plant chimney \bigcirc , boiler house \bigcirc , turbine hall \bigcirc , sneaky look at the control room as well \bigcirc .









All the decent footage I have of west burton chimney.







Best urban explorers in the chat









Ratcliffe when it was still running.























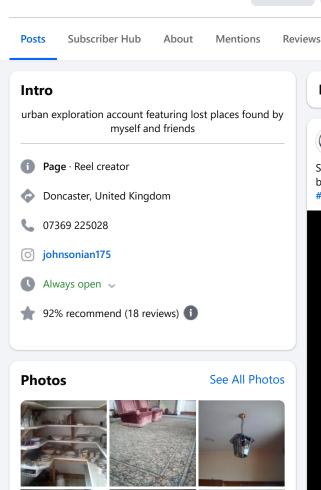
Urbex Lost & Found

287K followers • 94 following

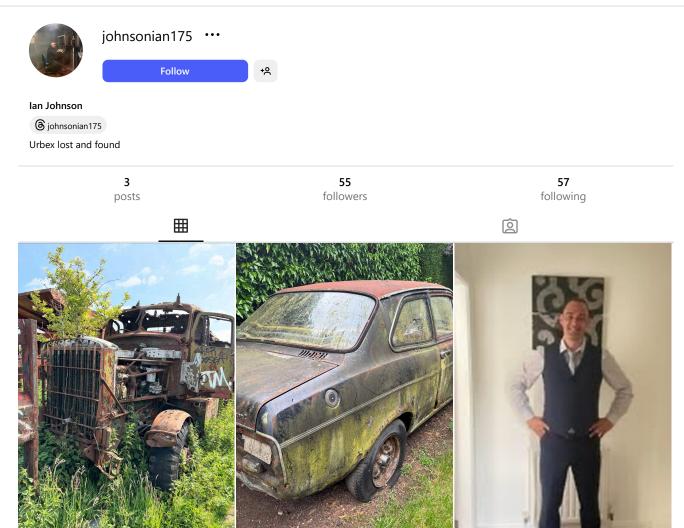


Reels

More ▼





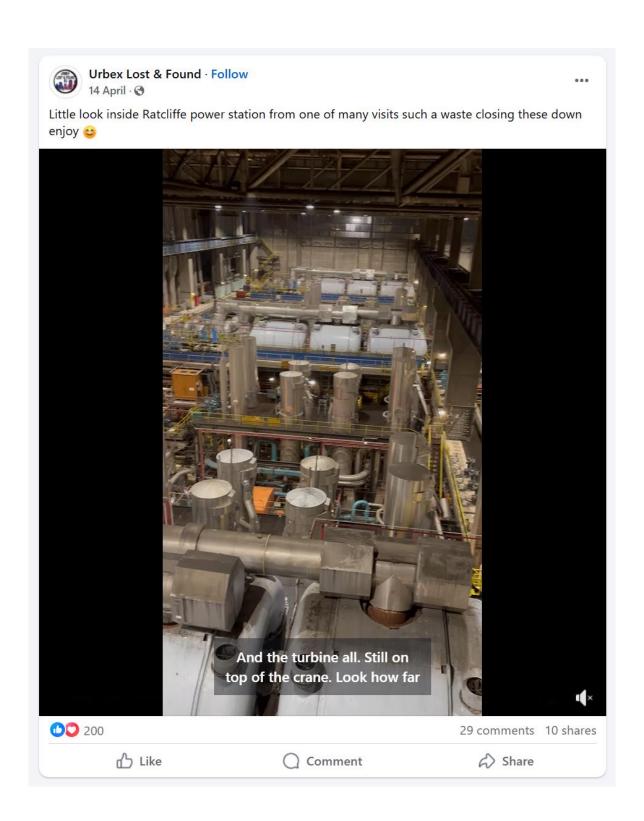






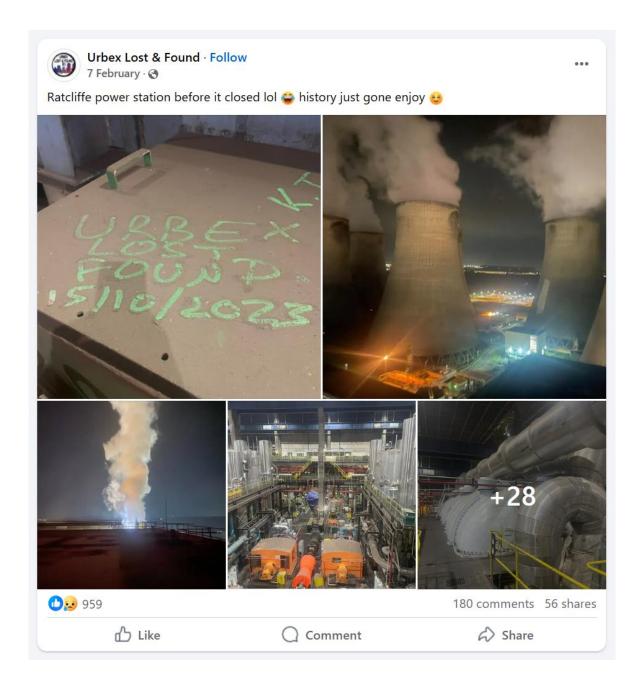


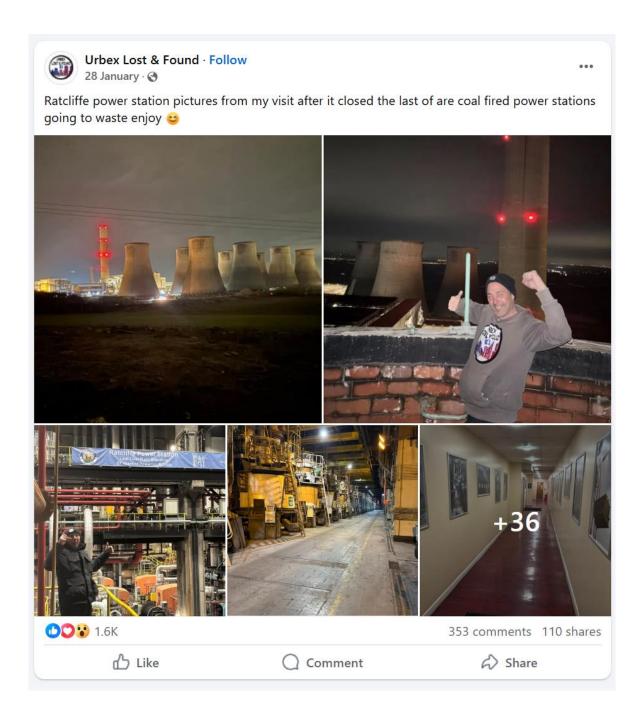


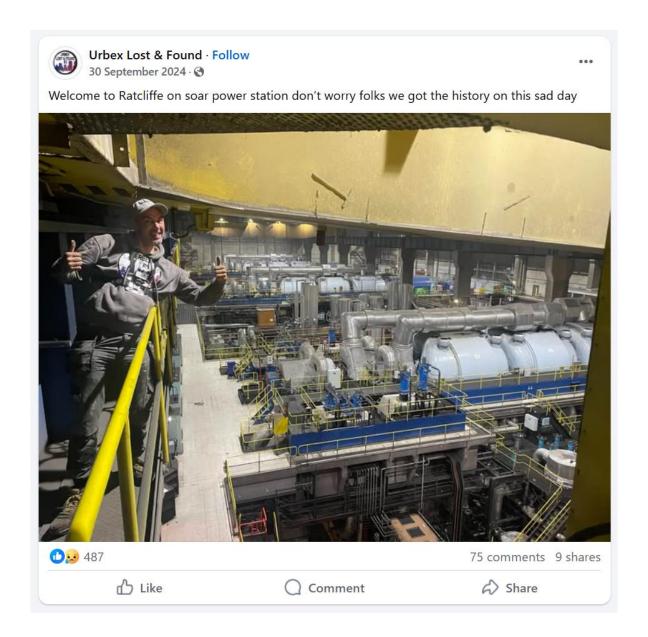


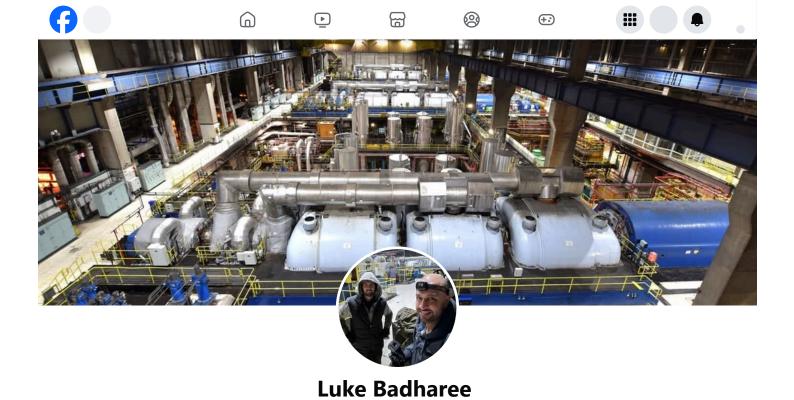




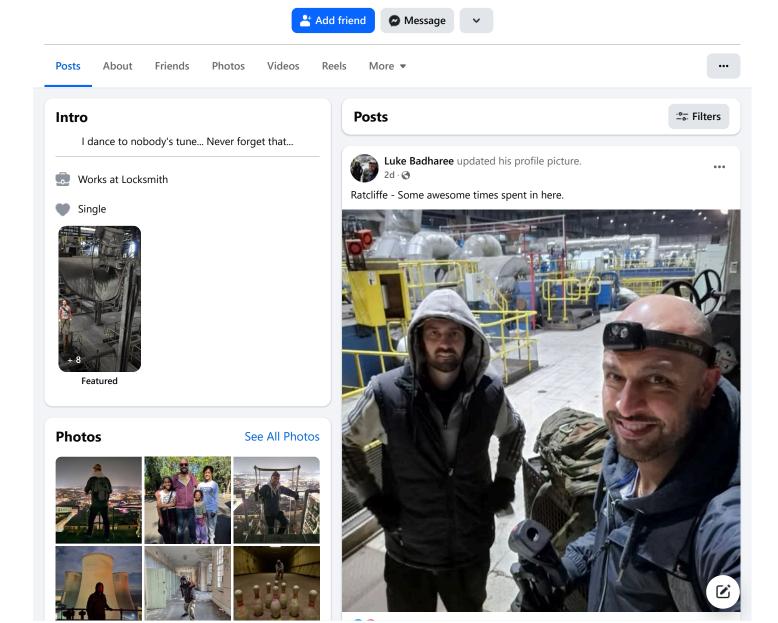


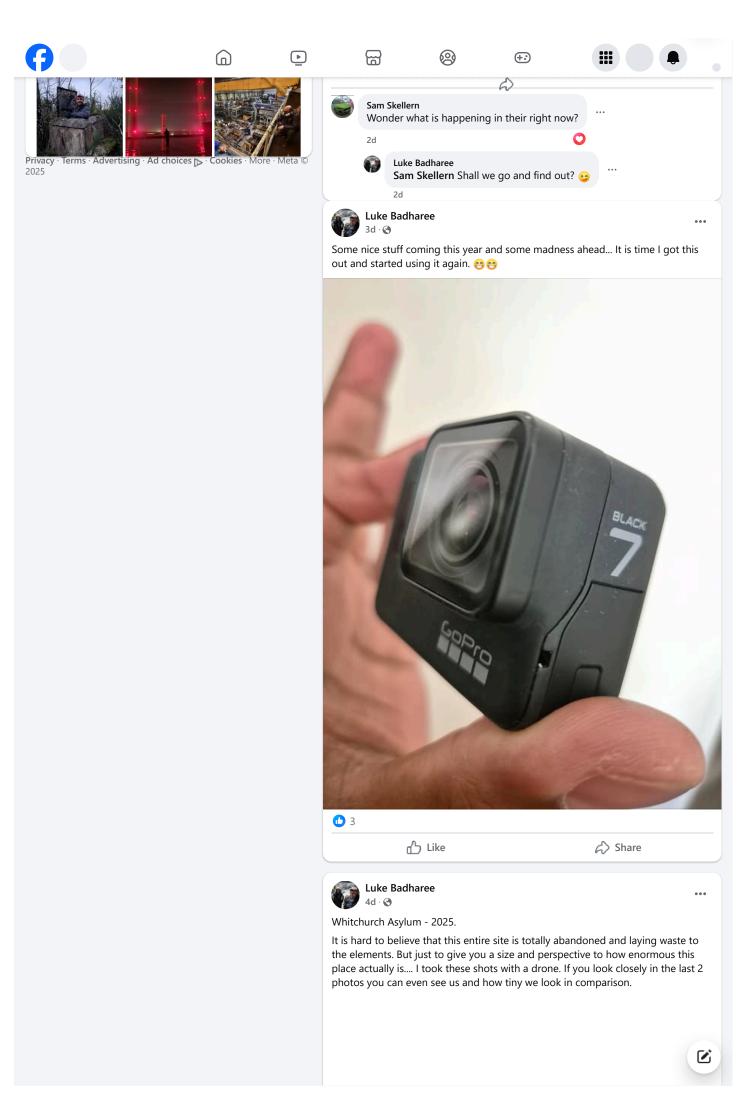


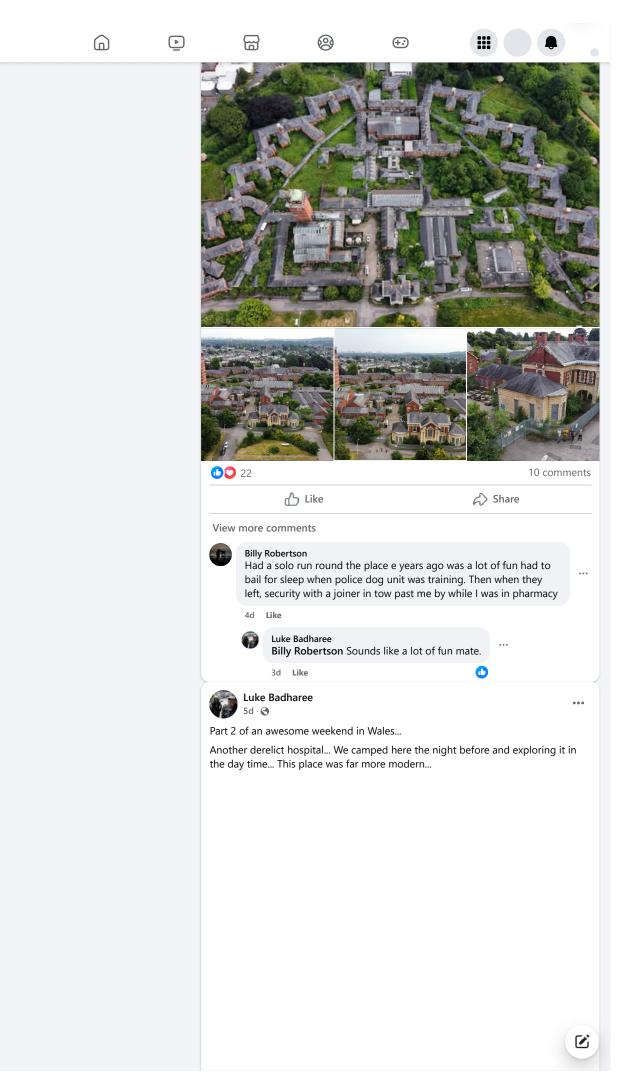


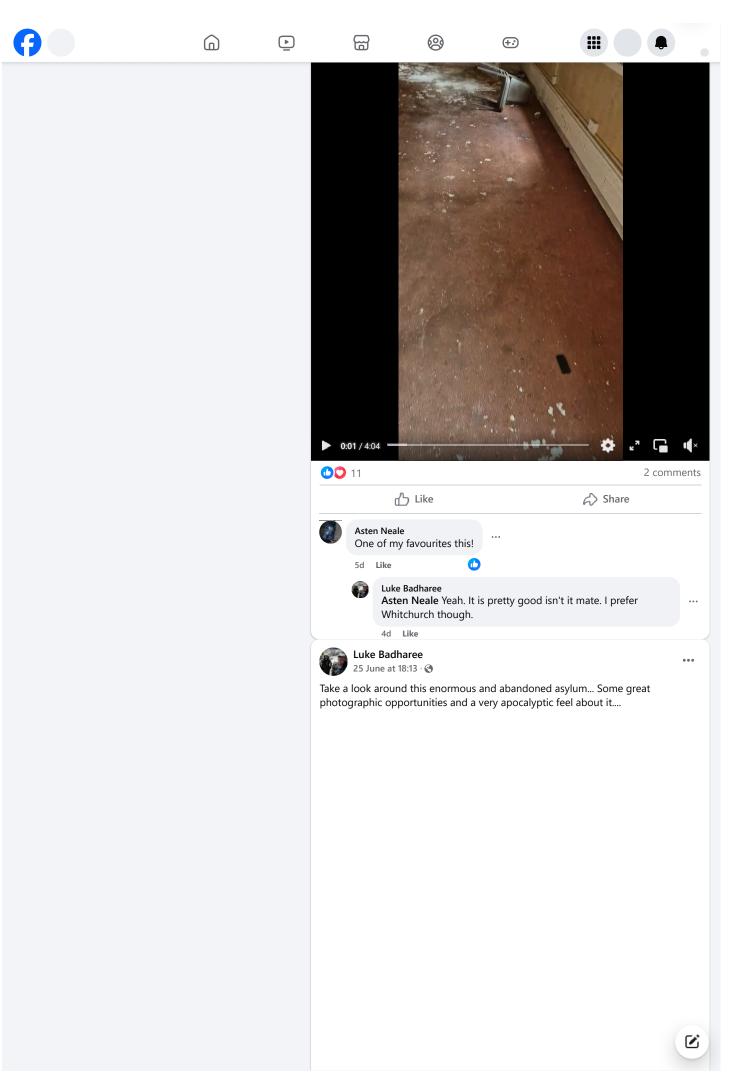


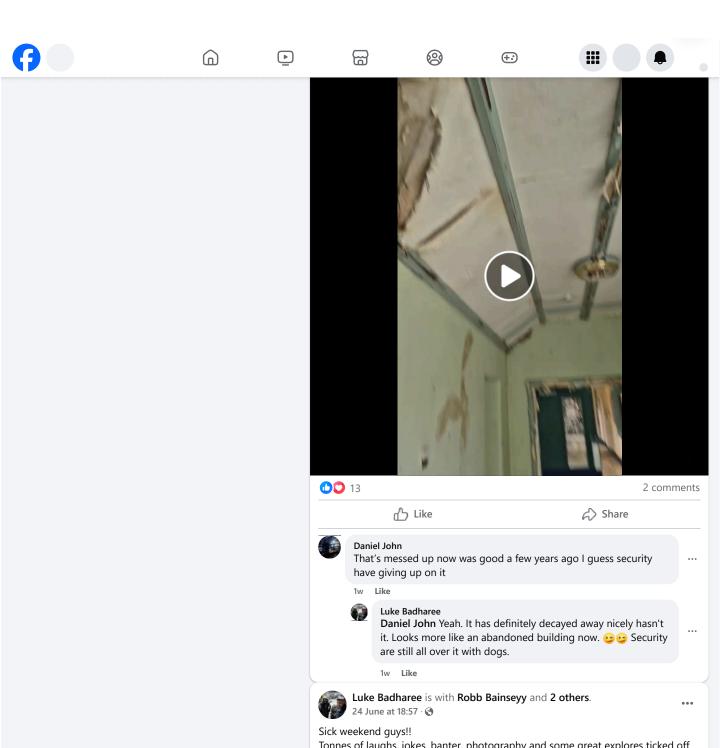
306 friends







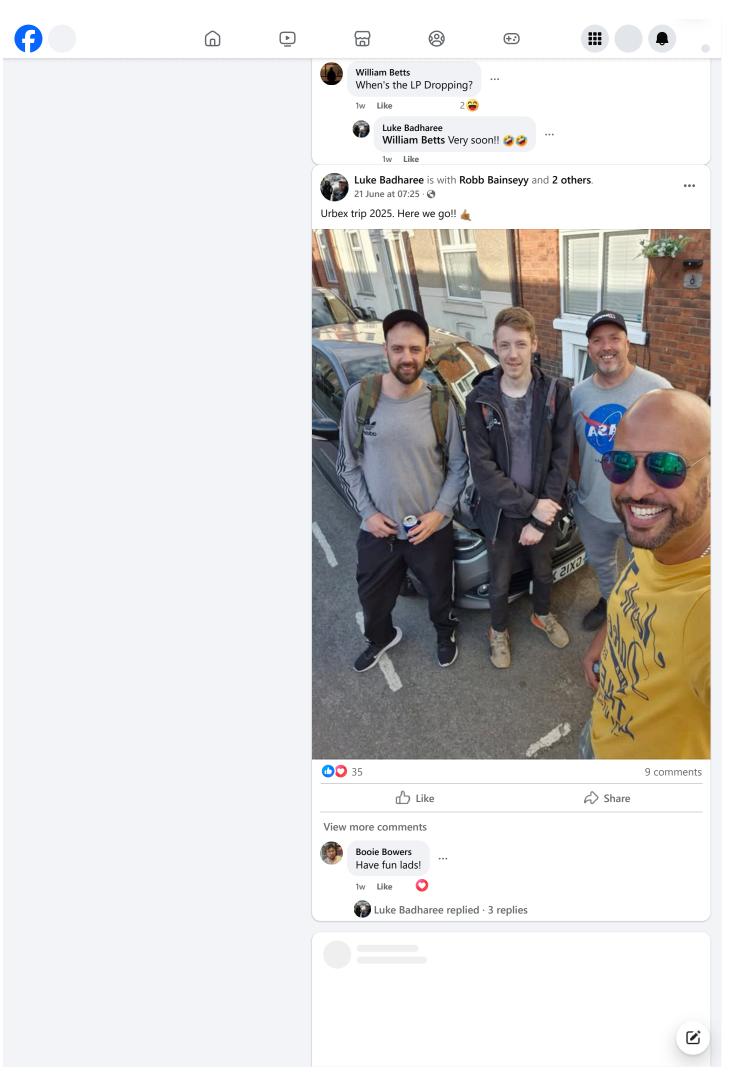


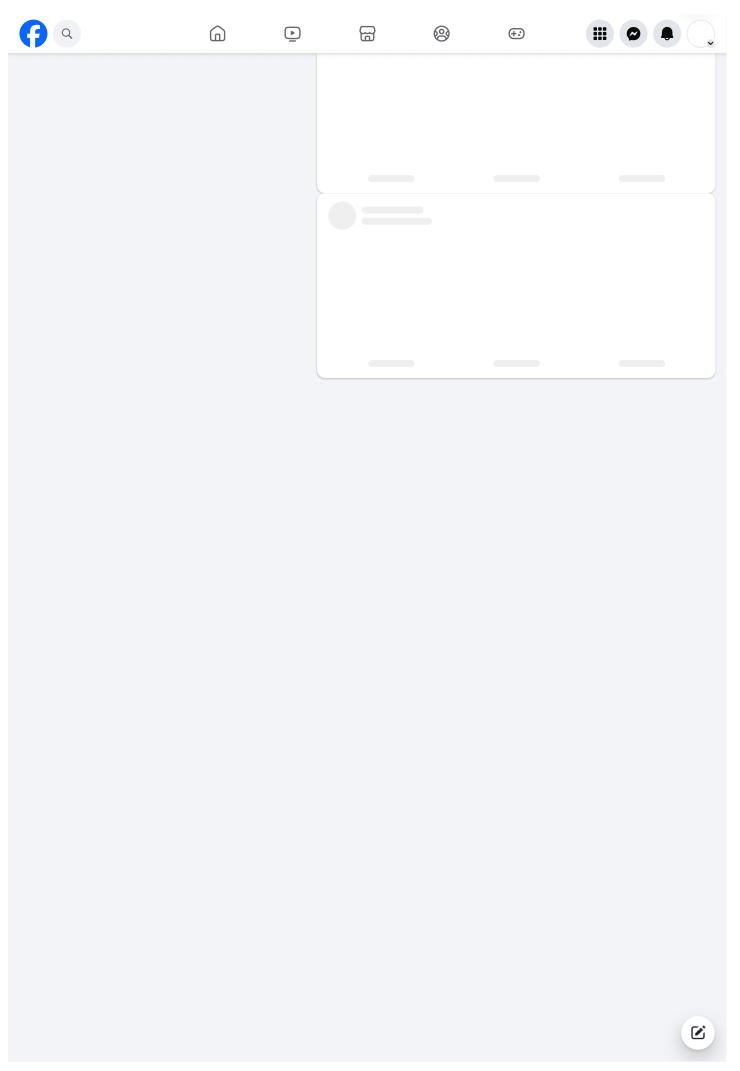


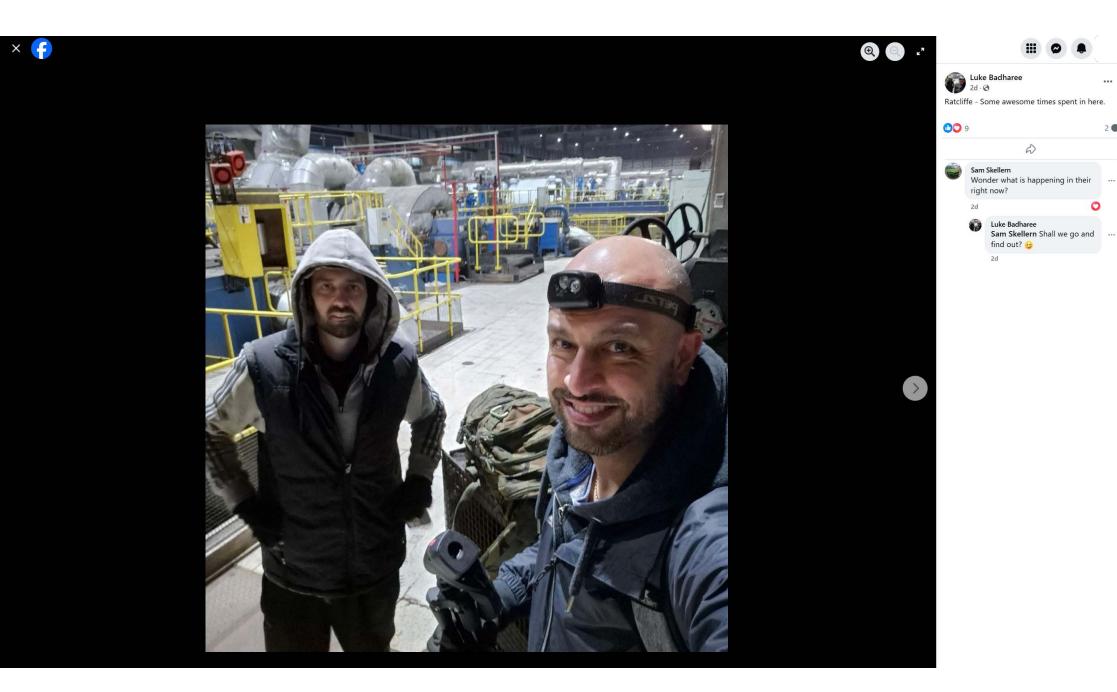
Tonnes of laughs, jokes, banter, photography and some great explores ticked off too... What the hobby is all about... Roll on the next adventure!!



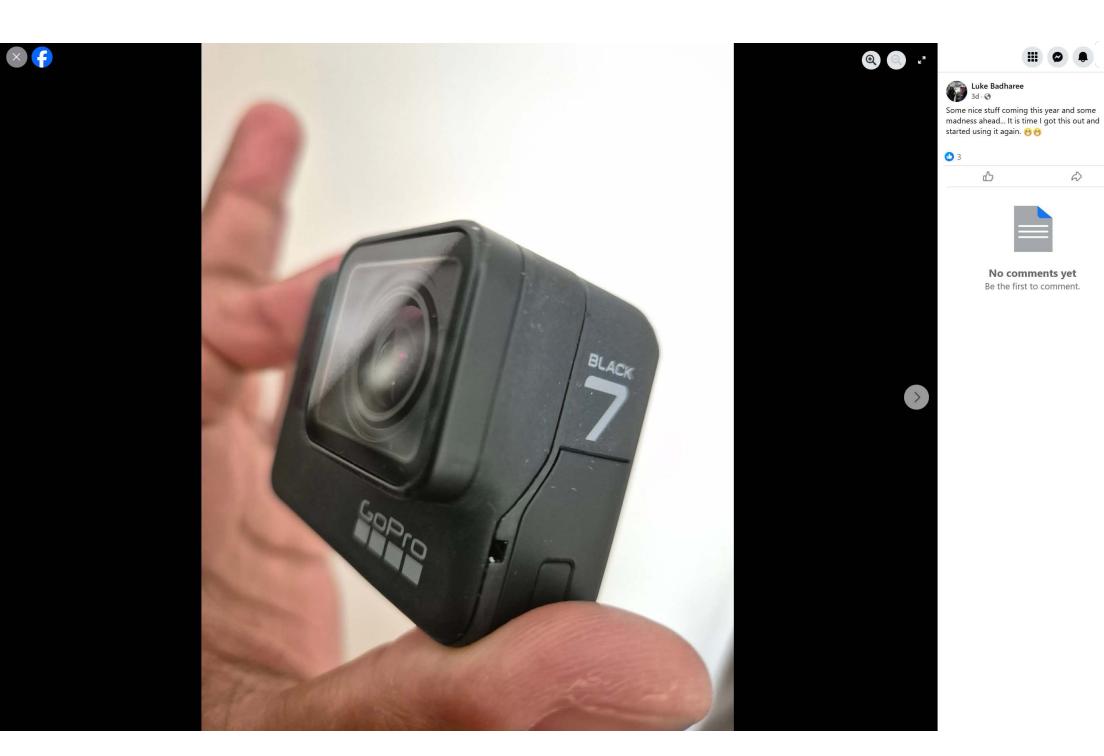
Share







0



0

HB/154



Ratcliffe power station time-hop. November 2021.



Ratcliffe Power Station

Lets sort the buyers from the spiers... The needy from the greedy... and the ones who trust me from the ones who don't...

This is Ratcliffe; the final coal-fired power station in the UK that closed in September 2024. It is currently under-going decommissioning process... It is an epic place with enormous photography potential if you like industry... For me it is the final piece of the power station puzzle that I've been on a mission to crack since 2020. Here are the pictures from the 2nd visit where we were able to feel a bit more relaxed about not getting spotted constantly.









Luke Badharee updated his profile picture. 5 February · 🚱

Ratters!! ee 🕍





HB/156



Uskmouth B Power Station

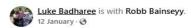
Uskmouth B power station was built in 1959. It's 3 generating sets have a capacity of 363 MW, which is enough to power 360,000 homes, or the surrounding area of Newport. Initially operated by the Central Electricity Generating Boarf, the station's operations were handed over to National Power upon privatisation in 1990. The station was closed in 1995, but in 1998 it was purchased by AES, given a £120 million refurbishment to bring it up to date with ... See more





The most anticipated exploring destination of 2024.





Darkness and light... Silhouettes and the night...





The final piece of the puzzle has been completed!!

I always wanted to have pictures from all the major power stations in the UK to document the former coal industry effectively in years to come. It was a challenge that I set myself a few years ago...

Last night I reached that goal...

British Coal... Completed it!!









The former site of West Burton A Power Station....

Built in 1966 The 410 sqm site produced a maximum output of 2000 MW on full capacity using 4 powerful English Electric designed turbines positioned length ways (rather than width ways like at many other stations); the equivalent of powering 2 million homes. The twin chimneys at West Burton are 660ft whilst the 8 cooling towers are situated in 2 groups of 4 either side of the station at 350ft tall each...

The site is notable for using water from the River Trent and for inspiring the design at Fiddlers Ferry which is extremley similar by design... Also for being the penultimate coal fired station in the UK; - Generating for the final time on 31st March 2023.

Drone footage filmed, produced and edited by myself.

I do not own the copyright to the music.





Yesterday I revisited Cottam power station after having photographed it a few times over the past 3 years... I knew demolition is in its advanced stages here now after many controlled detonations have occured...

90% of the main operating sections of the site now seem to be nothing more than rubble and twisted metal leaving only the chimney and cooling towers left as the main obstacles for controlled detonation. They too look like they are set to go next year. Here is the current state of Cottam in October 2024...





The Twin Towers...

"I was always looking And I held until the time began Solo things come at me I look to see where loss had ran I can have the sun it come And touch me on my shoulder Think of all the things that I could Wish that I had told her..."





Isn't it funny how you can be walking around a random field getting some much needed exercise and bump into somebody doing exactly the same thing... Except 4 years earlier - You bumped int the same person, doing exactly the same thing in another random field in Knottingly... I wonder what the common denominator is??





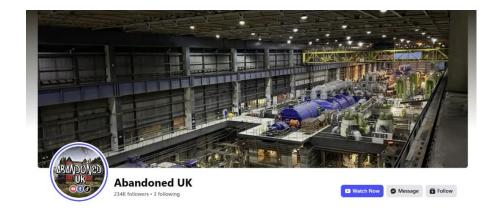
Today I work my final shift at Opus Energy aka Drax Power.

For those of you who don't know... I've worked for Opus for almost 11 years now and made redundant along with several hundred others as politics continue to consume t industry.

It has been a long roller coaster of a ride with some serious ups and downs but I've lead the course of time that I've been here and met some interesting characters along the ${\bf more}$



Abandoned UK





West Burton Power Station.

West Burton was a coal-fired power station, which was commissioned in 1966 and operated until march 2023

after 57 years.

Check out the video below

The station closed as planned on 31 March 2023. Decommissioning of the station is to take place throughout the remainder of 2023, and demolition is scheduled to begin in January 2024 it was a difficult place to get in to but we all love a challenge, it was different to most power stations we have been in and I'm sure most people will have travelled past in car or on train and wondered what it looks like inside.







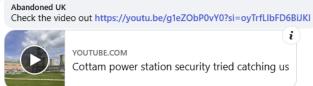
Cottam power station is a decommissioned coal fired power station. The coal fired station was decommissioned by EDF Energy in 2019 in line with the UK's goal to meet its zero-coal power generation by 2025.

They started building Cottom in 1964, and it took a number of years to build this power station it was opened in 1968 and has powered many homes over the years.

This was quite a tricky place to get into, but we did it. Anyone that has attempted this before will know security is on the ball here but like most places like this we might fail a few times but we always manage to get in even if it means waiting a hour for the right time. The 600+feet stack has been knocked down now won't be long before the site is fully gone.

Video below in comments





Like



Cottam power station is a decommissioned coal fired power station. The coal fired station was decommissioned by EDF Energy in 2019 in line with the UK's goal to meet it... See more







Ratcliffe on Soar Power Station. The construction of the power station began in 1963, and it was completed in 1967.

The station began generating power on 31 January 1968.

Ratcliffe is supplied with coal and other bulk commodities by rail via a branch off the adjacent Midland Main Line.

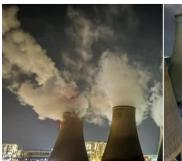
In 1981, the station was burning 5.5 million tonnes of coal a year, consuming 65% of the output of south Nottinghamshire's coal-mines.

In June 2021, the site was listed as a possible location for the world's first nuclear fusion power plant. However, it was withdrawn from the shortlist in January 2022.

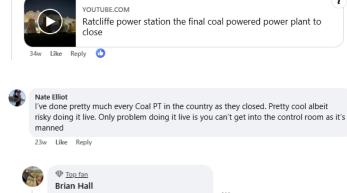
In response to the 2021 United Kingdom natural gas supplier crisis, the decommissioning of one of the station's 500-megawatt units, originally planned for September 2022, was delayed. In January 2024, all four of its generating units had to be run together for the final time in response to high demand from cold weather. In April 2024, one unit was placed into "preservation" mode, in advance of plant shutdown.

In June 2024, the last train of coal was delivered for burning at the power station. The station closed for power generation on 30 September 2024 at midnight ending 142 years of British coal power.

Full video in the comments







Ratcliffe power station full video https://youtu.be/5lywbo5GVil?si=v41sTsbQsgK3E7Oy

Abandoned UK





Check out the full video of Ratcliffe Power Station today was its final day. I hope you all enjoy the video . It was pretty interesting to see the last remaining coal p... See more



Ratcliffe power station the final coal powered power plant to close #1900s #abandoned #abandonedplaces #abandoneduk #exploring #exploringvlog #history #t...



Ratcliffe power station closes down tomorrow sad day for many



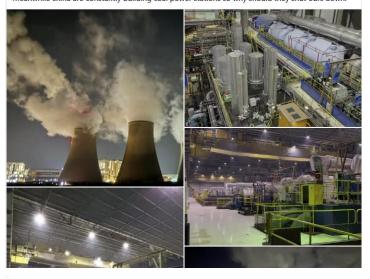
○ 2 K

1.1K comments 384 shares



Less then a week till the last coal power station is closed end of an era for coal power stations in the uk.

Meanwhile china are constantly building coal power stations so why should they shut ours down.



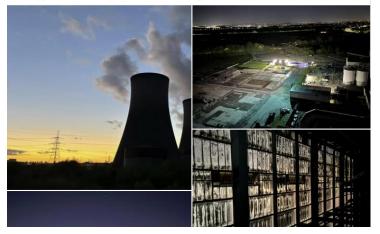


Won't be long now



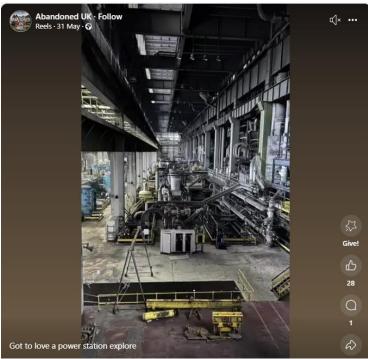


Fiddlers ferry power station someone say injunction order in twon't stop us although was suprised that they hadn't started stripping the turbine hall out yet short video in comments



The last remaining coal power station in the uk







This weeks video is out now.

In this weeks video, we take another look through fiddlers ferry power station to see how much has gone. So far, not much has happened apart from some of the cooling towers.

Click the link to set your reminders and drop a like.



Fiddlers ferry power station what it looks like in 2024

#abandoned #abandonedplaces #abandoneduk #exploring #exploringvlog #history #unitedki...

35

10 comments 13 shares

...

West Burton Power Station.

West Burton was a coal-fired power station, which was commissioned in 1966 and operated until march 2023 $\,$

after 57 years.

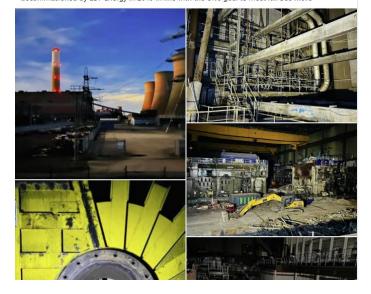
The station closed as planned on 31 March 2023. Decommissioning of the station is to take place throughout the remainder of 2023, and demolition is scheduled to begin in January 2024 it was a difficult place to get in to but we all love a challenge, it was different to most power stations we have been in and I'm sure most people will have travelled past in car or on train and wondered what it looks like inside.

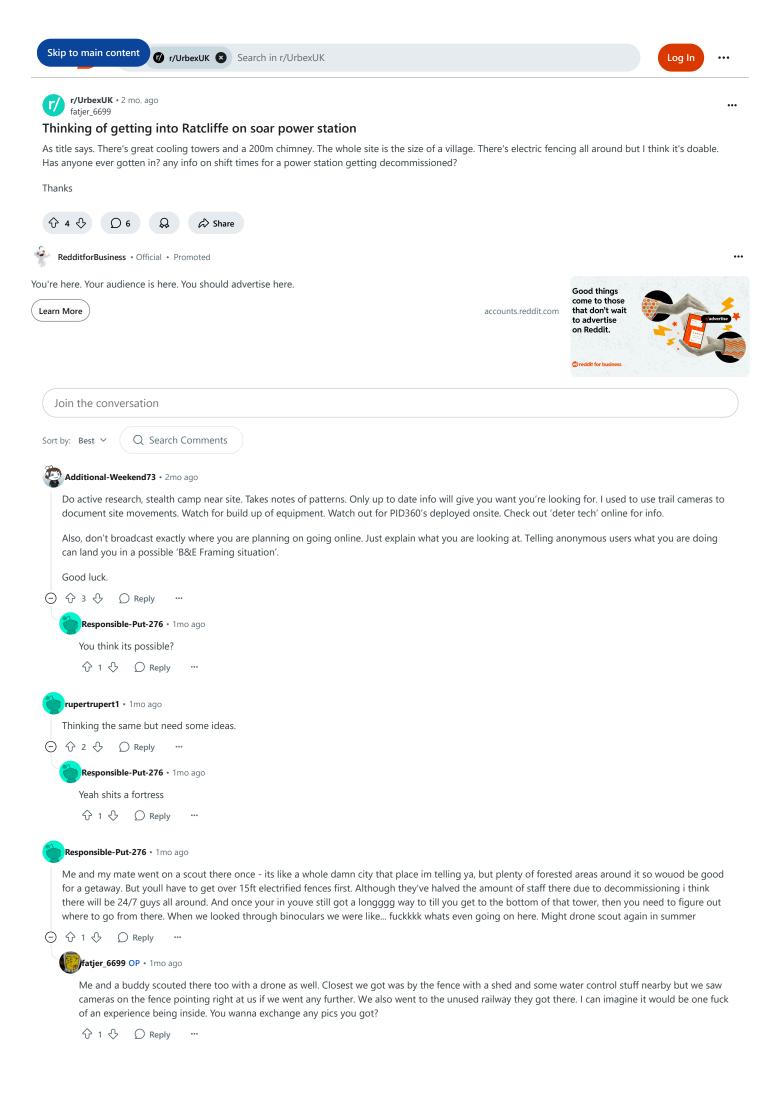
Video in the comments on the main page.

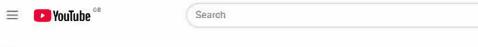




Cottam power station is a decommissioned coal fired power station. The coal fired station was decommissioned by EDF Energy in 2019 in line with the UK's goal to meet it... See more

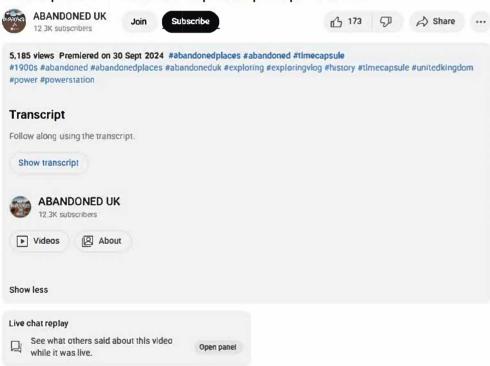








Ratcliffe power station the final coal powered power plant to close



61 Comments = Sort by

Add a comment...



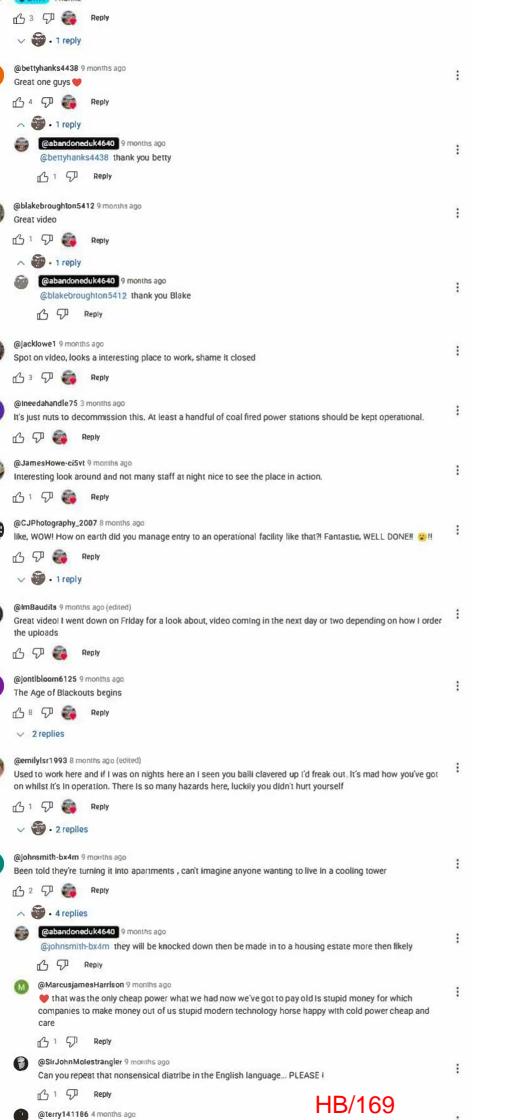
@tracyturner9406 9 months ago
That place is huge ... great video as always

↑ 5

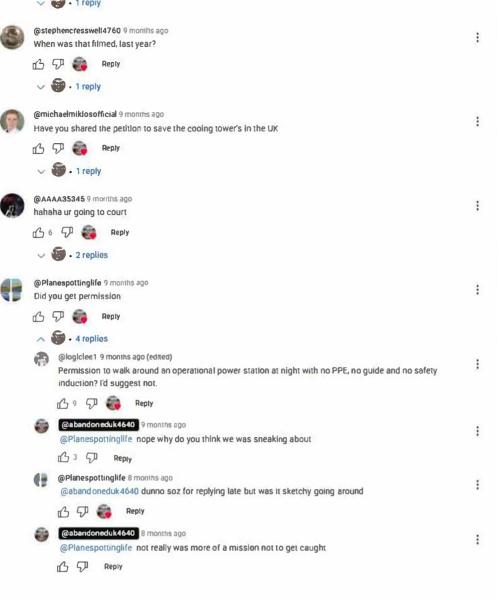
Reply

∨ 1 reply

:



	E-On are retaining the site they are currently looking at turning it into either a energy technology facility or a waste to energy generation site but thats facing alot of opposition.	
কো	@Urbandoned 9 months ago	
(<u>†</u>	UK power station with the least aura challenge 🎨	:
	C ← Reply	
	@christopherkennedy314 9 months ago Future of gaming will look like ∵	:
-	C 5 Reply	
	@ShipsoftheOceans 9 months ago (edited) Pretty easy to just walk in and nobody notice lol. But this was a very interesting video to see thanks for uploading.	•
	△ 1 💭 👸 Reply	
	√	
1	@leon-zjtr23pd 9 months ago	
	It is quite scary how you can get into these (some OPERATIONAL) power stations and just walk around, imagine if you had malicious intentions	•
	1 5 Reply	
	↑ 1 reply	
	@abandoneduk4640 9 months ago	
	@leon-z]tr23pd I know scary when you think of It like that	;
	△ □ Reply	
	@lerry141186 9 months ago (edited)	
9/6	My grandad worked there for 40 years been around there a few times with permission. How the bloody hell did you get In without being noticed 🍪 👸 security has been tight there since the protests.	
	公 3 √ P and Reply	
	△ 🏐 • 3 replies	
	@abandoneduk4640 9 months ago	:
	@terry141186 security didn't have a clue we're good at getting in unnoticed and bet that was good going around with permission	
	△ 1 🖓 Reply	
	@terry141186 4 months ago	:
	@abandoneduk4640 I honestly think explorers such as yourselves should he allowed in places like this its not as If you're harming anything.	
	△ □ Reply Repl	
	@abandoneduk4640 4 months ago	1
	@to much health and safety that stops them allowing us in places like that G Reply	
	D 27 Map)	
	@springws14lbss 9 months ago LOL, I've seen urban exploration of abandoned power plants, but never an active onel Too bad it shut down.	:
4.10	Greetings from the USAI	
	△ 2 5 Reply	
	• 1 reply	
	@abendoneduk4640 9 months ago @springws14lbss we wanted to be different not often you get to see a power station in operation	:
	△ 1	
	@Dec38105 9 months ago	
	UK used to have none profit state run power stations now we've got private enterprise green windmills	1
	ever wondered why your energy bills have doubled	
	△ 2 👽 🍇 Reply	
	@sonicbacon666 9 months ago I'd love to know when this was and what you genuinely thought of the place.	i
	凸 1 勺 📸 Reply	
	√ ♣ 1 reply	
	@boriss.861 6 months ago	
В	All designed on a Drawing Table with slide rules for the designers.	1
	凸 切 🍇 Reply	
0	@deano72 5 months ago	:
3	So what they using to replace the energy it produces	8.
	△ 57 🐞 Reply HB/170	



Party Name of Witness No. of statement Date Claimant A J Skelton First 21 July 2025

1

IN THE HIGH COURT OF JUSTICE

Claim no. [

Ciaiiii iio. [

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 THE
 PARTICULARS OF CLAIM) WITHOUT THE CONSENT OF THE CLAIMANT

Defendants

WITNESS STATEMENT OF ANDREW JAMES SKELTON

- 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

GBR01/122137325_1

- and/or causing a private nuisance at the Power Station. I am duly authorised to make this statement on the Claimant's behalf.
- 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 sublimate (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 Uttoxeter 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	490B46F487F84CE	
	ANDREW JAMES SKELTON	
DATED	21 July 2025	

Signed by:

GBR01/122137325_1 5

Party
Name of Witness
No. of statement
Exhibits
Date

Claimant G J Robertson Second "GJR2" 24 July 2025

IN THE HIGH COURT OF JUSTICE

Claim no. PT-2025-000739

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 THE
 PARTICULARS OF CLAIM) WITHOUT THE CONSENT OF THE CLAIMANT

Defendants

SECOND WITNESS STATEMENT OF GRAEME JAMES ROBERTSON

- I, **GRAEME JAMES ROBERTSON**, of Herbert Smith Freehills Kramer LLP, Exchange House, Primrose Street, London EC2A 2EG **WILL SAY** as follows:
- I am the same Graeme James Robertson who gave a first witness statement dated
 July 2025 in these proceedings.
- 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 (the "Power Station"). I am duly authorised to make this statement on the Claimant's behalf.

GBR01/122238185_1

- 3. 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.
- 4. There is now shown to me a bundle of documents, which I exhibit as "GJR2". I confirm that the documents in those exhibits are true copies of the documents. References in this witness statement to the page numbers in GJR2 are in the format GJR2/x.

Service of the claim and application documents

- 5. Following the filing of the Claimant's claim and application on 21 July 2025, sealed copies of the Claim Form and Application Notice (the latter endorsed with the hearing date) were provided by the Court via the CE-File to Herbert Smith Freehills Kramer LLP ("HSF Kramer") on 22 July 2025.
- 6. On 22 July 2025, the Claimant filed a slightly amended version of the Particulars of Claim that corrected two typographical errors, amended an incorrect cross-reference and appended the plans referenced in paragraphs 1 and 2 of the Particulars of Claim, which were previously in evidence but not appended to the Particulars of Claim. As the document had not yet been served, it was amended pursuant to CPR 17.1(1).
- 7. The Claimant then took the following steps:

Hard copies

- a. On 22 July 2025, hard copies of the following documents were sent via Royal Mail Special Delivery to the addresses stated in paragraph 11 of my first witness statement (that may be the addresses of the First and Fourth Defendants):
 - i. Sealed Claim Form
 - ii. Amended Particulars of Claim
 - iii. Sealed Application Notice
 - iv. Draft Order
 - v. Witness Statement of Graeme James Robertson dated 18 July 2025 and Exhibit GJR1

- vi. Witness Statement of Stephen Foster Close dated 21 July 2025 and Exhibit SC1;
- vii. Witness Statement of Andrew James Skelton dated 21 July 2025; and
- viii. Form N9 Response Pack and Notes for Defendant,

(the "Claim Documents").

- b. I understand from an associate in my team who reviewed the Royal Mail tracking website that delivery was attempted on 23 July 2025 but was unsuccessful at both addresses because there was no one present. Delivery was re-attempted on 24 July 2025 and was successful at the address in Doncaster that may be the address of the First Defendant, being signed for by "Josh" [GJR2/5]. Delivery was again unsuccessful at the address in Northampton that may be the address of the Fourth Defendant because there was no one present [GJR2/6].
- c. Because delivery of the hard copies had not been successful by Royal Mail Special Delivery by 23 July 2025, the Claimant instructed a process server to hand deliver hard copies of the Claim Documents to the two addresses. I understand from reviewing the statements of Gary Da Costa [GJR2/7-12] and Philip Tyler [GJR2/13-18] (the Claimant's instructed process servers) that hand delivery was attempted at the address in Northampton at 15:25 on 23 July 2025 and at the address in Doncaster at 15:45 on 23 July 2025. The statements report that no one answered the door at either address and so the process servers posted the documents through the respective letterboxes.

Electronic copies

- d. In the early hours of 23 July 2025, I was informed by the Claimant's Senior Project Communications Specialist that the following website page had been published with links to view and download each of the Claim Documents: https://www.uniper.energy/ratcliffe-power-station-site-injunction (the "Website"). A screenshot of the Website as at 24 July 2025 is exhibited at GJR2/24.
- e. The Claimant instructed Equivo, an enforcement company/process server to assist with the sending of messages to the First to Fourth Defendants via Facebook. I understand from discussing with an associate in my team, who had a series of telephone calls and email exchanges with the Director of Equivo, that on 23 July 2025 Equivo attempted to send a Facebook message to each of the

- First, Second, Third and Fourth Defendants in the terms exhibited at **GJR2/4**. The Director of Equivo confirmed to the associate in my team that he had successfully sent messages to each of the First, Third and Fourth Defendants, but was unable to send a message to the Second Defendant as this option was not available to him on the Facebook profile page of the Second Defendant.
- f. Given this, Equivo attempted to locate alternative contact information for the Second Defendant. I understand from the associate in my team that on 23 July 2025 the Director had a telephone conversation with a Kayleigh Williams, who indicated that she is the Second Defendant's mother. Ms Williams provided an email address to Equivo to which the Claim Documents could be sent and the associate in my team subsequently sent an email to Ms Williams on 24 July 2025 [GJR2/25] attaching a copy of the Sealed Claim Form, Amended Particulars of Claim, Application Notice and Draft Order, with a link to the Website where the rest of the Claim Documents are available to view and download.

Warning notices

g. On 23 July 2025 I was informed by the Claimant's Services Team Leader for the Power Station that the Claimant had completed the affixing of hard copy warning notices in the locations described in paragraph 12.c of my first witness statement. A copy of the warning notice is exhibited at GJR2/3. As per the warning notice, the Claimant has made available hard copies of the Claim Documents at the main outer gatehouse to the power station site and hard copies can also be obtained from the offices of HSF Kramer.

Further Facebook posts from the Defendants

- 8. I exhibit Facebook posts dated 23 July 2025 from the First Defendant [GJR2/19], Fourth Defendant [GJR2/20] and the "Urbex Lost & Found" Facebook Group (which, I understand from the Witness Statement of Stephen Foster Close dated 21 July 2025, is suspected by the Claimant to be run by the Third Defendant) [GJR2/21-23]. Each post is a photograph of an internet meme with the text "BRACE YOURSELF... INJUNCTION EXPERTS ARE COMING BACK FOR MORE".
- 9. On the First Defendant's post **[GJR2/19]**, various individuals including the First, Second, Third and Fourth Defendants appear to discuss the Claimant's injunction application. In one comment chain, the Second Defendant states "ha well atleast we didn't spend 10 hours in a cell again ". The First Defendant states "haha wonder

how many more visits we did after that lol stupid dog patrol wot a waste of money".

The Fourth Defendant states "That is written in the paperwork too. 🔞 🔞 ". The First

Defendant states "i gotta sit down and read all this shite". The Fourth Defendant

responds "It'll take you all day 🔞 🔞". This indicates that at minimum the First and

Fourth Defendants have received and/or are able to access the documents relating

to the Claimant's application.

10. On the post on the "Urbex Lost & Found" group page [GJR2/21-23], the Fourth

Defendant comments "Just another day in the office mate". The page responds

"exactly mate it's more off [sic] a challenge now lol... game on lol...". A Robin

Hickmott comments separately "The Injunction hasn't gone through the courts yet.

Best get those engines revin [sic] boys" and the page responds "on route Iol".

Another page ("B&R Urban Explorers Uk") comments "Which one we've one lined

up sat I think" and the Urbex Lost & Found page responds "Ratcliffe been many

times upset them to much lol".

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

Graeme Robertson

GRAEME JAMES ROBERTSON

DATED

24 July 2025

Party Name No. of statement Exhibits Date Claimant G J Robertson Second "GJR2" 24 July 2025

IN THE HIGH COURT OF JUSTICE

Claim no. PT-2025-000739

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 THE
PARTICULARS OF CLAIM) WITHOUT THE CONSENT OF THE CLAIMANT

Defendants

EXHIBIT "GJR2"

This is the exhibit marked **"GJR2"** referred to in the Second Witness Statement of **GRAEME JAMES ROBERTSON** dated 24 July 2025.

GRAEME JAMES ROBERTSON

Graeme Robertson

EXHIBIT GJR2 – INDEX

#	Document	Date	Page
1	Warning Notice for Application and Hearing		3
2	Text of Facebook message to First to Fourth Defendants		4
3	Doncaster address – Royal Mail proof of delivery	24.07.25	5
4	Northampton address – Royal Mail notice that delivery was unsuccessful	24.07.25	6
5	Statement of process server re hand delivery to Doncaster address	24.07.25	7
6	Statement of process server re hand delivery to Northampton address	24.07.25	13
7	Screenshot of Joshua Barter Facebook post (accessed 24.07.25)	24.07.25	19
8	Screenshot of Luke Badharee Facebook post (accessed 24.07.25)	24.07.25	20
9	Screenshots of Urbex Lost & Found Facebook post (accessed 24.07.25)	24.07.25	21
10	Screenshot of Uniper injunction website	24.07.25	24
11	Email to Kayleigh Williams	24.07.25	25

HIGH COURT CLAIM NO: PT-2025-000739

Application for High Court Injunction NOTICE OF LODGING OF A CLAIM AND APPLICATION AND HEARING ON 30 JULY

TO: (1) Joshua Barter, (2) Sam Williams, (3) Ian Johnson, (4) Luke Badharee and (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) (the "Defendants")

FROM: Uniper UK Limited ("the Claimant")

The Claimant has lodged a claim and application dated 21 July 2025 for an injunction to restrain the Defendants from acts of trespass and/or private nuisance on the land shown edged in red (excluding the land shaded blue) on the plan below, and an application for an order for alternative service of the claim and application documents.

A hearing has been listed at 10:30 on 30 July 2025 in Court 10, The Rolls Building - 7 Rolls Building, London EC4A 1NL.

The claim and application documents may be viewed in hard copy at the outer gatehouse to the Ratcliffe-on-Soar Power Station (marked with a purple 'X' on the below plan) or electronically at https://www.uniper.energy/ratcliffe-power-station-site-injunction

Copies may also be obtained from Herbert Smith Freehills Kramer LLP at Exchange House, Primrose Street, London EC2A 2EG, on 020 7374 8000 (cite reference 21992) or by email at injunctions@hsfkramer.com.



Text of Facebook message to First to Fourth Defendants:

PT-2025-000739: Uniper UK Limited v (1) Joshua Barter, (2) Sam Williams, (3) Ian Johnson, (4) Luke Badharee, (5) Persons Unknown (the "Claim")

We are instructed by Uniper UK Limited (the "Claimant"), the owner and operator of the former Ratcliffe-on-Soar Power Station.

Please take note that on 21 July 2025 the Claimant issued the Claim against you and the other stated defendants and applied for an injunction to restrain you from acts of trespass and/or private nuisance on the land shown edged in red (excluding the land shaded blue) on the plan appended to the Claim Form, as well as an order for alternative service.

Electronic copies of the claim and application documents can be found at https://www.uniper.energy/ratcliffe-power-station-site-injunction.

An application hearing has been listed before the High Court on Wednesday 30 July 2025 at 10:30 in Court 10, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL.

Given the contents of this message, you should take independent legal advice.



Track your Item

Proof of delivery

Tracking number: SP975816344GB





Your item was delivered on 24-07-2025.

Signed for by: JOSH

Service used: Royal Mail Special Delivery Guaranteed 1pm™

Delivered at: 09:45, Thursday 24 July 2025



Receiving

 \leftarrow Track another item

Cymraeg



Delivery Attempted

Sorry, we tried to deliver your parcel on 24-07-2025 but there didn't seem to be anyone in. We'll automatically reattempt delivery of your parcel the **next working day** so you don't need to do anything. Alternatively, you can book a redelivery for a different date that suits you. Please choose an option below.

If you haven't already, you can also book a redelivery through the <u>Royal Mail App</u> or book a redelivery <u>here</u>. For Channel Islands and Isle of Man please contact your postal service provider.

Tracking number:

SP975816327GB

Service used:

Royal Mail Special Delivery Guaranteed 1pm™



Tracking history

Statement of: Gary Da Costa

Statement No: 1 Exhibit No: A Dated: As dated

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

NO: PT-2025-000739

BETWEEN

UNIPER UK LIMITED

Claimant

-and-

(1) JOSHUA BARTER
(2) SAM WILLIAMS
(3) IAN JOHNSON
(4) LUKE BADHAREE
(5) PERSONS UNKNOWN

Defendants

STATEMENT OF PROCESS SERVER

I, Gary Da Costa for A.S.H. (UK) Process Servers Ltd, 3 The Oak Tree, Elmhurst Business Park, Park Lane, Lichfield, Staffordshire, WS13 8EX will state:

- That I am a process server acting under the direction of Herbert Smith Freehills Kramer LLP, Exchange House, Primrose Street, London, EC2A 2EG, and that this statement has been prepared based on evidence collated by myself.
- 2. That on Wednesday 23 July 2025 at 15:45 hours at 139 Wike Gate Road, Thorne, Doncaster, DN8 5JH I did serve Mr Joshua Barter with the Letter dated 23/07/25, Claim Form, Particulars of Claim, Application Notice, Draft Order, Witness Statement of Stephen Foster with Exhibit SC1, Witness Statement of Andrew James Skelton, Witness Statement of Graeme James Robertson with Exhbit GJR1 and Response Pack issued in this action by way of posting the said documents through the letterbox having received no response at the address.
- That a copy of the documents served by me is now attached and marked 'A'
- 4. 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: JMendesDaCosta

Gary Da Costa - Process Server

Dated: 24 July 2025

Statement of: Gary Da Costa

Statement No: 1 Exhibit No: A Dated: As dated

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

NO: PT-2025-000739

BETWEEN

UNIPER UK LIMITED

Claimant

-and-

(1) JOSHUA BARTER
(2) SAM WILLIAMS
(3) IAN JOHNSON
(4) LUKE BADHAREE
(5) PERSONS UNKNOWN

Defendants

Exhibit 'A'

This is the exhibit marked 'A' referred to in the Statement of Gary Da Costa.



Mr Joshua Barter 139 Wike Gate Road Thorne Doncaster DN8 5JH Herbert Smith Freehills Kramer LLP
Exchange House
Primrose Street
London EC2A 2EG
T +44 (0)20 7374 8000
F +44 (0)20 7374 0888
DX28 London Chancery Lane
E injunctions@hsfkramer.com
www.HSFKramer.com

Our ref 21992/31074640

Date 23 July 2025

By hand

Dear Mr Barter

PT-2025-000739: Uniper UK Limited v (1) Joshua Barter, (2) Sam Williams, (3) Ian Johnson, (4) Luke Badharee, (5) Persons Unknown

We act for Uniper UK Limited, the owner and operator of the former Ratcliffe-on-Soar Power Station (the "Claimant").

Please find enclosed the following documents in relation to the above claim, in which you are named as a defendant. Electronic copies of the documents can be found at https://www.uniper.energy/ratcliffe-power-station-site-injunction:

- 1. Claim Form
- 2. Particulars of Claim
- 3. Application Notice
- 4. Draft Order
- 5. Witness Statement of Stephen Foster Close dated 21 July 2025
- 6. Exhibit SC1
- 7. Witness Statement of Andrew James Skelton dated 21 July 2025
- 8. Witness Statement of Graeme James Robertson dated 18 July 2025
- 9. Exhibit GJR1
- 10. Form N9 Response Pack and Notes to Defendant

Please take note that the Claimant has applied for an injunction against you and the other stated defendants in the terms set out in the above documents. An application hearing has been listed before the High Court of Justice (Business & Property Courts of England & Wales) in Court 10, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL on Wednesday 30 July 2025 at 10:30.

Herbert Smith Freehills Kramer LLP and its affiliated and subsidiary businesses and firms, Herbert Smith Freehills Kramer (US) LLP and its affiliate, and Herbert Smith Freehills Kramer, an Australian Partnership, are separate member firms of the international legal practice known as Herbert Smith Freehills Kramer.

Herbert Smith Freehills Kramer LLP is a limited liability partnership registered in England and Wales with registered number OC310989. Herbert Smith Freehills Kramer LLP is authorised and regulated by the Solicitors Regulation Authority of England and Wales (SRA number: 419682). A list of the members and their professional qualifications is open to inspection at the registered office, Exchange House, Primrose Street, London EC2A 2EG. We use the word partner of Herbert Smith Freehills Kramer LLP to refer to a member of Herbert Smith Freehills Kramer LLP, or an employee or consultant with equivalent standing and qualifications.



Date 23 July 2025 Letter to Mr Joshua Barter

Given the contents of this letter, you should take independent legal advice.

Yours faithfully

Herbert Smith Freshills Kramer LLP

Herbert Smith Freehills Kramer LLP

CLAIM DOCUMENTS NOT REPLICATED FOR THE PURPOSE OF EXHIBIT GJR2

Statement on behalf of Claimant Statement of: Gary Da Costa

Statement No: 1 Exhibit No: A Dated: As dated

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

NO: PT-2025-000739

BETWEEN

UNIPER UK LIMITED

Claimant

-and-

(1) JOSHUA BARTER
(2) SAM WILLIAMS
(3) IAN JOHNSON
(4) LUKE BADHAREE
(5) PERSONS UNKNOWN

Defendants

STATEMENT OF PROCESS SERVER

A.S.H. (UK) Process Servers Ltd 3 The Oak Tree Elmhurst Business Park Park Lane, Lichfield Staffordshire WS13 8EX United Kingdom

Tel: 01543 888218

Our Reference: A/94625

Statement of: Philip Tyler

Statement No: 1 Exhibit No: A Dated: As dated

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

NO: PT-2025-000739

BETWEEN

UNIPER UK LIMITED

Claimant

-and-

(1) JOSHUA BARTER (2) SAM WILLIAMS (3) IAN JOHNSON (4) LUKE BADHAREE (5) PERSONS UNKNOWN

Defendants

STATEMENT OF PROCESS SERVER

I, Philip Tyler for A.S.H. (UK) Process Servers Ltd, 3 The Oak Tree, Elmhurst Business Park, Park Lane, Lichfield, Staffordshire, WS13 8EX will state:

- That I am a process server acting under the direction of Herbert Smith Freehills Kramer LLP, Exchange House, Primrose Street, London, EC2A 2EG, and that this statement has been prepared based on evidence collated by myself.
- 2. That on Wednesday 23 July 2025 at 15:25 hours at 11 Grove Road, Northampton, NN1 3LH I did serve Mr Luke Badharee with the Letter dated 23/07/25, Claim Form, Particulars of Claim, Application Notice, Draft Order, Witness Statement of Stephen Foster with Exhibit SC1, Witness Statement of Andrew James Skelton, Witness Statement of Graeme James Robertson with Exhibit GJR1, Response Pack issued in this action by way of posting the said documents through the letterbox having received no response from the address.
- That a copy of the documents served by me is now attached and marked 'A'
- 4. 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:

Philip Tyler - Process Server

Dated:

24TH Juy 2015

Statement of: Philip Tyler

Statement No: 1 Exhibit No: A Dated: As dated

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

NO: PT-2025-000739

BETWEEN

UNIPER UK LIMITED

Claimant

-and-

(1) JOSHUA BARTER (2) SAM WILLIAMS (3) IAN JOHNSON (4) LUKE BADHAREE (5) PERSONS UNKNOWN

Defendants

Exhibit 'A'

This is the exhibit marked 'A' referred to in the Statement of Philip Tyler.



Mr Luke Badharee 11 Grove Road Northampton NN1 3LH

Herbert Smith Freehills Kramer LLP
Exchange House
Primrose Street
London EC2A 2EG
T +44 (0)20 7374 8000
F +44 (0)20 7374 0888
DX28 London Chancery Lane
E injunctions@hsfkramer.com
www.HSFKramer.com

Our ref 21992/31074640

Date 23 July 2025

By hand

Dear Mr Badharee

PT-2025-000739: Uniper UK Limited v (1) Joshua Barter, (2) Sam Williams, (3) Ian Johnson, (4) Luke Badharee, (5) Persons Unknown

We act for Uniper UK Limited, the owner and operator of the former Ratcliffe-on-Soar Power Station (the "Claimant").

Please find enclosed the following documents in relation to the above claim, in which you are named as a defendant. Electronic copies of the documents can be found at https://www.uniper.energy/ratcliffe-power-station-site-injunction:

- 1. Claim Form
- 2. Particulars of Claim
- 3. Application Notice
- 4. Draft Order
- 5. Witness Statement of Stephen Foster Close dated 21 July 2025
- 6. Exhibit SC1
- 7. Witness Statement of Andrew James Skelton dated 21 July 2025
- 8. Witness Statement of Graeme James Robertson dated 18 July 2025
- 9. Exhibit GJR1
- 10. Form N9 Response Pack and Notes to Defendant

Please take note that the Claimant has applied for an injunction against you and the other stated defendants in the terms set out in the above documents. An application hearing has been listed before the High Court of Justice (Business & Property Courts of England & Wales) in Court 10, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL on Wednesday 30 July 2025 at 10:30.

Herbert Smith Freehills Kramer LLP and its affiliated and subsidiary businesses and firms, Herbert Smith Freehills Kramer (US) LLP and its affiliate, and Herbert Smith Freehills Kramer, an Australian Partnership, are separate member firms of the international legal practice known as Herbert Smith Freehills Kramer.

Herbert Smith Freehills Kramer LLP is a limited liability partnership registered in England and Wales with registered number OC310989. Herbert Smith Freehills Kramer LLP is authorised and regulated by the Solicitors Regulation Authority of England and Wales (SRA number: 419682). A list of the members and their professional qualifications is open to inspection at the registered office, Exchange House, Primrose Street, London EC2A 2EG. We use the word partner of Herbert Smith Freehills Kramer LLP to refer to a member of Herbert Smith Freehills Kramer LLP, or an employee or consultant with equivalent standing and qualifications.



Date 23 July 2025 Letter to Mr Luke Badharee

Given the contents of this letter, you should take independent legal advice.

Yours faithfully

Herbert Smith Freehills Kramer LLP

Herbert Smith Freehills Kramer LLP

CLAIM DOCUMENTS NOT REPLICATED FOR THE PURPOSE OF EXHIBIT GJR2

Statement of: Philip Tyler

Statement No: 1 Exhibit No: A

Dated: As dated

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

NO: PT-2025-000739

BETWEEN

UNIPER UK LIMITED

Claimant

-and-

(1) JOSHUA BARTER

(2) SAM WILLIAMS

(3) IAN JOHNSON

(4) LUKE BADHAREE (5) PERSONS UNKNOWN

Defendants

STATEMENT OF PROCESS SERVER

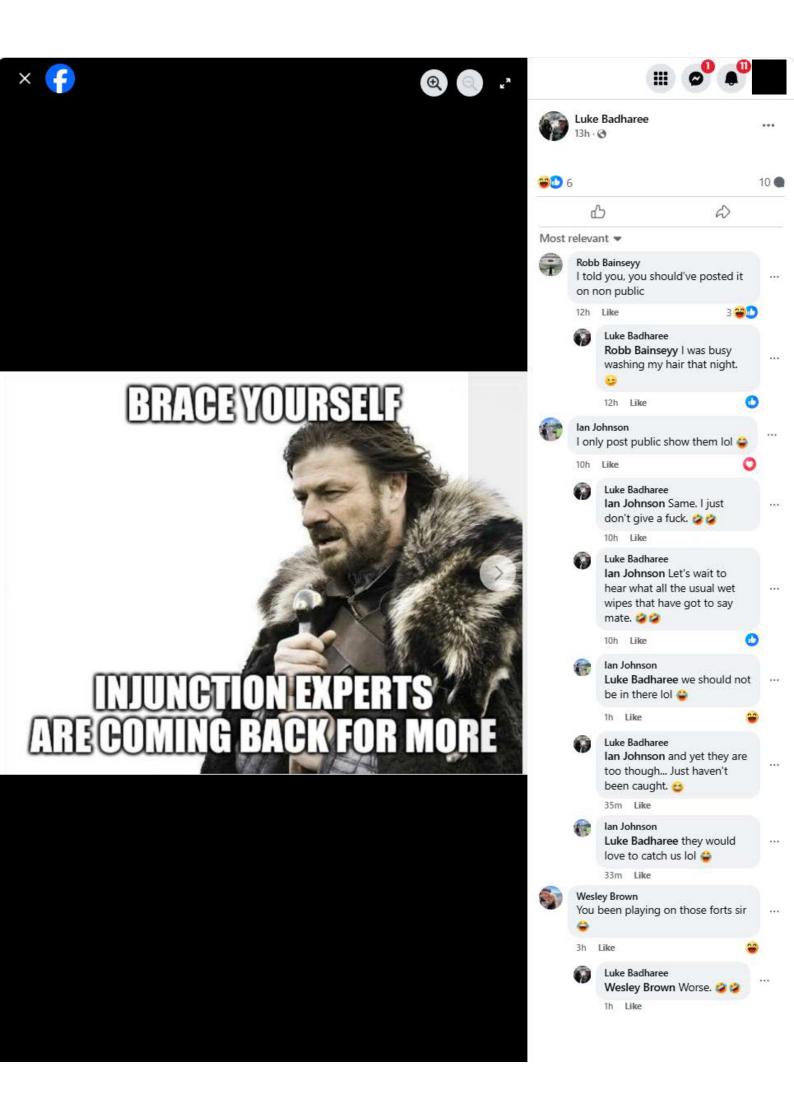
A.S.H. (UK) Process Servers Ltd 3 The Oak Tree Elmhurst Business Park Park Lane, Lichfield Staffordshire WS13 8EX United Kingdom

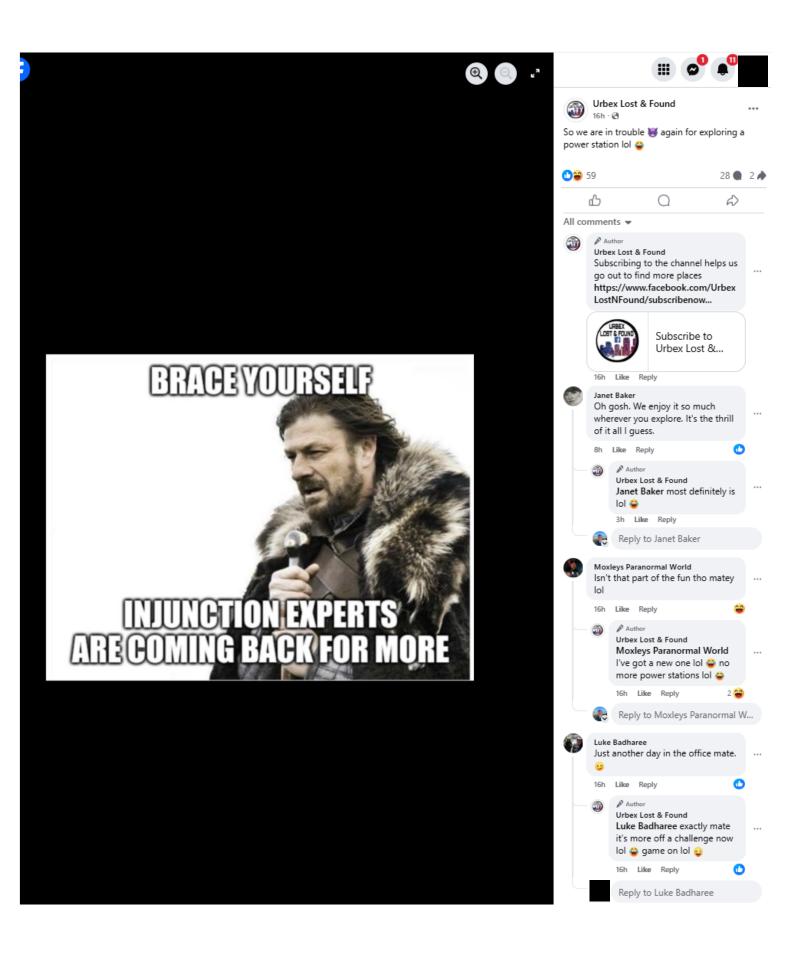
Tel: 01543 888218

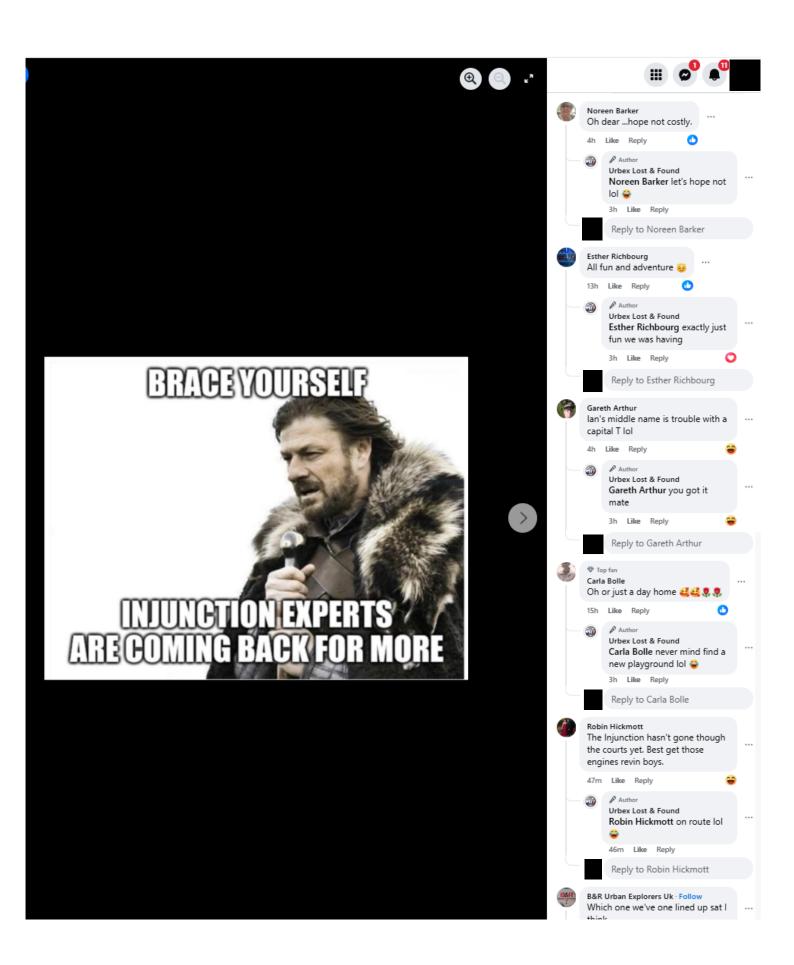
Our Reference: A/94623

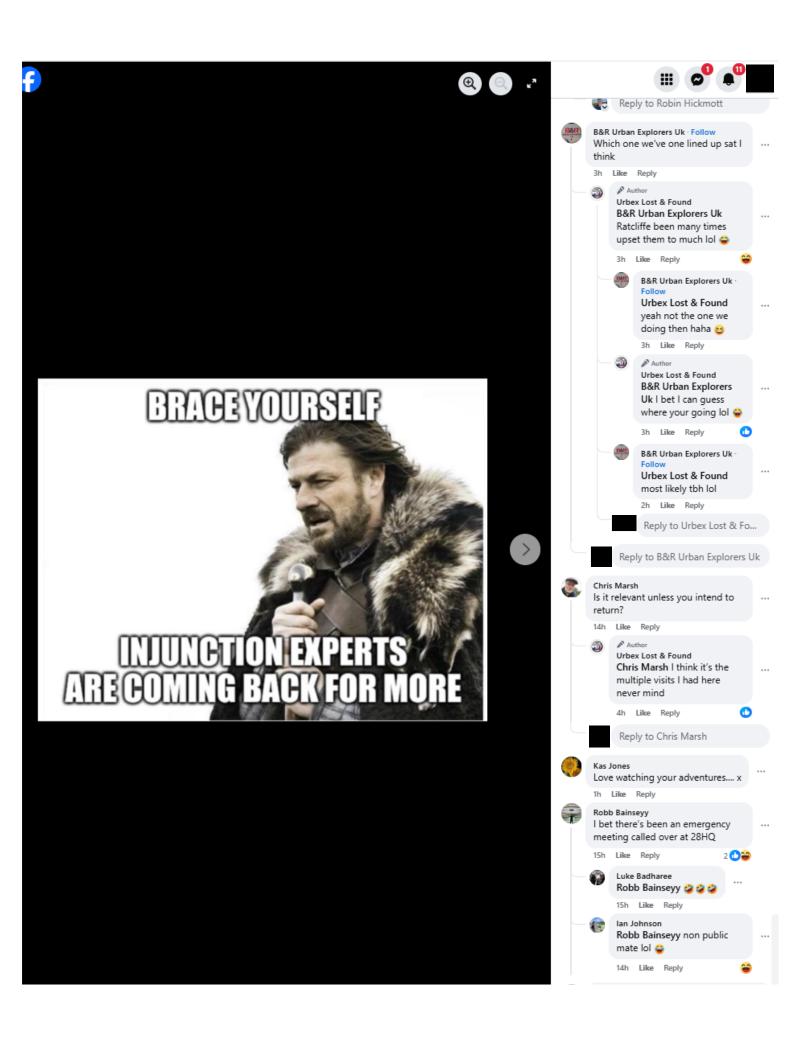












Ratcliffe Power Station Site Injunction



On 21 July 2025, Uniper UK Limited ("Uniper") applied to the High Court for an injunction against (1) Joshua Barter, (2) Sam Williams, (3) Ian Johnson, (4) Luke Badharee and (5) Persons Unknown to restrain them from acts of trespass and/or private nuisance on the power station site (the land shown edged in red, excluding the land shaded blue, on the plan appended to the Claim Form).

Uniper's application has been listed to be heard by the High Court of Justice (Business & Property Courts of England & Wales) on 30 July 2025 at 10:30 in Court 10, 7 Rolls Building, London EC4A 1NL.

Electronic copies of the claim and application documents are available to view and download using the following links:

Sealed Claim Form	PDF - 2.67 MB
Amended Particulars of Claim	PDF - 1.52 MB
Sealed Application Notice	PDF - 521.43 KB
Draft Order	PDF - 852.35 KB
Witness Statement of Graeme James Robertson dated 18 July 2025	PDF - 134.49 KB
Exhibit GJR1	PDF - 32.65 MB 🛓
Witness Statement of Stephen Foster Close dated 21 July 2025	PDF - 332 KB 🛓
Exhibit SC1	PDF - 64.86 MB
Witness Statement of Andrew James Skelton dated 21 July 2025	PDF - 151.92 KB

From: Injunctions

Sent: 24 July 2025 09:28

To: kayleighlwilliams@outlook.com

Subject: PT-2025-000739: Uniper UK Limited v Joshua Barter, Sam Williams, Ian Johnson,

Luke Badharee, Persons Unknown [HSF-GBR01.FID5037607]

Attachments: 01 Uniper v PUs and others - Claim Form (sealed).pdf; 02 Uniper v PUs and others -

Particulars of Claim.pdf; 03 Uniper v PUs and others - Application Notice

(sealed).pdf; 04 Uniper v PUs and others - Draft Order.pdf

Dear Ms Williams

We act for Uniper UK Limited ("**Uniper**"), the owner and operator of the former Ratcliffe-on-Soar Power Station.

Please take note that on 21 July 2025 Uniper issued a claim against Mr Sam Williams and the other stated defendants and applied for an injunction to restrain them from acts of trespass and/or private nuisance on the land shown edged in red (excluding the land shaded blue) on the plan appended to the Claim Form, as well as an order for alternative service.

We have been passed your details by our instructed process server, Equivo, in order to provide you copies with the documentation relating to Uniper's claim and application. Please find attached to this email the Claim Form, Particulars of Claim, Application Notice and Draft Order. Due to file size, the remaining documents (being the Witness Statement of Stephen Foster Close and Exhibit SC1; Witness Statement of Andrew James Skelton and Witness Statement of Graeme James Robertson and Exhibit GJR1) can be viewed and downloaded at the following website: https://www.uniper.energy/ratcliffe-power-station-site-injunction.

An application hearing has been listed before the High Court on Wednesday 30 July 2025 at 10:30 in Court 10, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL.

Should you wish to discuss the contents of this email, please contact this firm on 020 7466 2018. However, we of course cannot advise you or Mr Williams and you should take independent legal advice.

Yours sincerely

Herbert Smith Freehills Kramer LLP

T+44 20 7466 2018 www.hsfkramer.com