

IN THE HIGH COURT OF JUSTICE

BUSINESS AND PROPERTY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE Generation UK PLC

Claimant

And

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION
ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR
WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM,
FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY
GREENPEACE CAMPAIGN OR OTHERWISE**

(2) Greenpeace UK Limited

(3) Greenpeace Limited

Defendants

VOLUME 1

HEARING BUNDLE FOR REVIEW HEARING

**LISTED FOR A HALF DAY TO BE HEARD IN A THREE DAY WINDOW FROM 19 TO
21 OCTOBER 2026**

*Pagination in this bundle is in **red** font. All other pagination relates to internal
document numbering.*

*Note that Volume 2 (HEARING BUNDLE FOR RETURN HEARING - 24 OCTOBER
2025 – UPDATED AS AT 22 OCTOBER 2025) can also be located here:*

<https://uk.rwe.com/injunction/>

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Claim Form (CPR Part 8)

In the High Court of Justice
Chancery Division

Claim no.

Fee Account no.

PBA/0080949/DKA/10062680

Help with Fees -
Ref no. (if appli-
cable)

H W F -



PT-2025-001017

Claimant

RWE GENERATION UK PLC
(Company registration number 3892782)

SEAL

Defendant(s)

Please refer to the Schedule to the Claim Form

Does your claim include any issues under the Human Rights Act 1998? ☒ Yes ☐ No

Details of claim (see also overleaf)

The Claimant seeks an injunction to restrain the Defendants from acts of trespass or nuisance on or affecting the Claimant's land, as more particularly described in the Particulars of Claim.

Defendant's
name and
address

£

Court fee

646

Legal representative's
costs

Issue date

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.	
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Details of claim (continued)
See attached Particulars of Claim

Osborne Clarke LLP
One London Wall
London
EC2Y 5EB

(Ref: DKA/10002880)

injunctions@osborneclarke.com
donal.kelly@osborneclarke.com

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

Statement of Truth

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.

☐ I **believe** that the facts stated in these particulars of claim are true.

☒ **The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

Signature



☐ Claimant

☐ Litigation friend (where claimant is a child or a Protected Party)

☒ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

01

Month

10

Year

2025

Full name

DONAL PATRICK KELLY

Name of claimant's legal representative's firm

Osborne Clarke LLP

If signing on behalf of firm or company give position or office held

Legal Director

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SCHEDULE TO THE CLAIM FORM

- (1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE
- (2) GREENPEACE UK LIMITED (Company Registration No: 02463348)

SCHEDULE TO THE CLAIM FORM

- (1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE
- (2) GREENPEACE UK LIMITED (Company Registration No: 02463348) whose registered office is at: Greenpeace House, Canonbury Villas, London, N1 2PN

IN THE HIGH COURT OF JUSTICE

Claim No:

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE GENERATION UK PLC

(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED

(Company registration number 02463348)

Defendants

PARTICULARS OF CLAIM

1. The Claimant is a company registered in England and Wales under company number 3892782. It is part of the RWE group of companies, and provides electricity generation to the GB Electricity System.
2. The Claimant operates ten gas-fuelled power stations within the UK. Its six largest power stations cumulatively provide around 7000MW of operational capacity per day.
3. The Claimant's operation of fossil fuel power stations has previously made it a target for protest.
4. However, there has recently emerged a specific threat of direct action, including a threat of damage and/or disruption to the Claimant's facilities.
5. The Claimant considers that the level of risk is now such that it needs to call on the Court for protection by way of injunctive relief.

THE LAND TO WHICH THE CLAIM RELATES

6. The Claimant seeks injunctive relief to protect the six largest of its gas fired power stations (collectively, "the Sites") being:
 - 6.1 Staythorpe Power Station, Staythorpe, Newark, NG23 5RQ, as shown edged red on Plan 1 annexed to these Particulars of Claim ("Staythorpe Power Station");
 - 6.2 Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2 annexed to these Particulars of Claim ("Didcot Power Station");
 - 6.3 Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3 annexed to these Particulars of Claim ("Pembroke Power Station");
 - 6.4 Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4 annexed to these Particulars of Claim ("Little Barford Power Station");
 - 6.5 Great Yarmouth Power Station, South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5 annexed to these Particulars of Claim ("Great Yarmouth Power Station"); and

- 6.6 Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6 annexed to these Particulars of Claim (“Kings Lynn Power Station”).
7. The Sites perform a critical function. The National Grid depends on the electricity generated by those Site being available in order to maintain the gross capacity of electricity to supply the grid. Disruption to the supply available at one or more of the Sites has the potential, in turn, to cause significant disruption to the grid, including the potential for power cuts.
8. Furthermore, unauthorised entry upon the Sites presents dangers to the health and safety of the trespassers themselves, as well as to the health and safety of those authorised to be present upon the Sites, and others such as members of the emergency services who might be called upon to attend to deal with any unauthorised intrusion or its consequences.
9. Furthermore, disruption to the generation of electricity at the Sites has the potential to cause economic harm to the Claimant.

Staythorpe Power Station

10. Staythorpe Power Station is a gas-fired combined-cycle gas turbine facility (“CCGT”) which commenced commercial operations in 2010. It is wholly surrounded by a secure perimeter fence. The area in respect of which injunctive relief is sought, as shown edged red on Plan 1, is demarcated by that perimeter fence.
11. Staythorpe Power Station is situated wholly on land of which the Claimant (under a previous company name) is the registered freehold proprietor. Title to the land on which the Power Station is situated (and which extends beyond the perimeter fence) is registered at HM Land Registry under title number NT349128.
12. There are three areas within the Staythorpe Power Station which are subject to leasehold interests registered to third parties. These are shown hatched blue on Plan 1A, and comprise:
- 12.1 Land at Staythorpe Power Station, registered at HM Land Registry under title number NT372031 of which National Gas Transmission Plc is the registered leasehold proprietor;

- 12.2 Land at Staythorpe Power Station, registered at HM Land Registry under title number NT409895 of which National Grid Electricity Transmission Plc is the registered leasehold proprietor; and
- 12.3 Part of Staythorpe Power Station, registered at HM Land Registry under title number NT421944 of which National Grid Electricity Transmission Plc is the registered leasehold proprietor. Whilst this leasehold interest remains registered at HM Land Registry, it is the subject of a pending application to close the leasehold title the land to which it relates having been incorporated back into the Claimant's freehold title.

Didcot Power Station

13. Didcot Power Station comprises an open cycle gas turbine ("OCGT") and a CCGT. It is wholly surrounded by a secure perimeter fence. The area in respect of which injunctive relief is sought, as shown edged red on Plan 2, is demarcated by that perimeter fence.
14. Didcot Power Station is primarily situated on land of which the Claimant is the registered freehold proprietor. The Claimant's freehold title (which extends to land beyond the perimeter fence) is registered at HM Land Registry under title numbers ON157852 and BK69895 (registered under a previous company name). A small portion of Didcot Power Station is situated on land of which the Claimant is the registered leasehold proprietor, title to which is registered at HM Land Registry under title number ON322203.
15. There are four areas within Didcot Power Station which are subject to leasehold interests registered to third parties. These are shown hatched blue on Plan 2A, and comprise:
 - 15.1 Land and buildings at Didcot Power Station, registered at HM Land Registry under title number ON191378 of which National Grid Electricity Transmission Plc is the registered leasehold proprietor, which is adjoined by:
 - 15.2 Land at Didcot Power Station, registered at HM Land Registry under title number ON297164 of which National Grid Electricity Transmission Plc is the registered leasehold proprietor;

- 15.3 Land on the north side of Milton Road, registered at HM Land Registry under title number ON194931, of which National Gas Transmissions Plc is the registered leasehold proprietor; and
- 15.4 Electricity sub-stations at Didcot Power Station, registered at HM Land Registry under title number ON210652, of which SSE Services Plc is the registered leasehold proprietor.

Pembroke Power Station

16. Pembroke Power Station includes the Pembroke CCGT and the Pembroke Net Zero Centre. It is wholly surrounded by a secure perimeter fence. The area in respect of which injunctive relief is sought, as shown edged red on Plan 3, also includes a construction site immediately abutting the southwestern part of the main power plant site and on which existing operational infrastructure is located and additional operational infrastructure is being constructed which will become operational in the near future. Both the main power plant and the construction site are fenced.
17. Pembroke Power Station is situated wholly on land of which the Claimant is the registered freehold proprietor. The Claimant's freehold title in and surrounding Pembroke Power Station is registered at HM Land Registry under title numbers WA962157, CYM768801, CYM12566 and CYM399739.

Little Barford Power Station

18. Little Barford Power Station comprises a CCGT and OCGT facility. It is situated on two sites, separated by a public highway. Each of the sites is wholly surrounded by a secure perimeter fence, and the two sites are linked by a footbridge over Barford Road ("the Bridge"). The area in respect of which injunctive relief is sought, as shown edged red on Plan 4, is demarcated by the perimeter fence around each site and includes the Bridge.
19. The two sites comprising Little Barford Power Station are situated wholly on land of which the Claimant (under a previous company name) is the registered freehold

proprietor, title to which is registered at HM Land Registry under title number BD214443.

20. There are two areas falling within Little Barford Power Station which are subject to a leasehold interest registered to a third party. These areas are shown hatched blue on Plan 4A, and comprise land at Little Barford Power Station, title to which is registered at HM Land Registry under title number BD168495. The registered leasehold proprietor is Easter Power Networks Plc.
21. The Bridge is not included within the Claimant's title.

Great Yarmouth Power Station

22. Great Yarmouth Power Station is a CCGT which has been operated by the Claimant since 2002. It is wholly surrounded by a secure perimeter fence. The area in respect of which injunctive relief is sought, as shown edged red on Plan 5, is primarily demarcated by that perimeter fence.
23. Great Yarmouth Power Station is situated wholly on land of which the Claimant (under a previous company name) is the registered freehold proprietor, title to which is registered at HM Land Registry under title number NK166277. There are two areas falling partly within Great Yarmouth Power Station which are subject to leasehold interest registered to Eastern Power Networks Plc. These are shown hatched blue on Plan 5A, and comprise:
 - 23.1 Substation, South Denes Road, Great Yarmouth, title to which is registered at HM Land Registry under title number NK363229; and
 - 23.2 Tunnel and access shaft on the east side of South Denes Road, Great Yarmouth, title to which is registered at HM Land Registry under title number NK363233.

Kings Lynn Power Station

24. Kings Lynn Power Station is CCGT which has been operated by the Claimant since 2020. It is wholly surrounded by a secure perimeter fence. The area in respect of which

injunctive relief is sought, as shown edged red on Plan 6, is demarcated by that perimeter fence.

25. The area within the perimeter fence includes a substation which is owned by Eastern Power Networks Plc, title to which is registered at HM Land Registry under title number NK218673, and shown hatched green on Plan 6A (“the Sub Station”). The Sub Station is separately fenced but is accessed through the Power Station, with access thus controlled by the Claimant.
26. Excepting the Sub Station, the majority of the land within Kings Lynn Power Station is land of which the Claimant is the registered freehold proprietor, title to which is registered at HM Land Registry under title numbers NK108157 and NK271060.
27. There is a small area of land within the north eastern part of the sites which is inside the perimeter fence but does not appear on the boundary shown on the title plans to title number NK271060 (“the NE Area”). The NE Area is enclosed within the perimeter fence and used as an integral part of the Power Station. For the purposes of this claim, the Claimant does not positively assert freehold ownership but does assert that it is a person entitled to sufficient possession or control of the NE Area to entitle it to pursue a claim in trespass against the Defendants.
28. There is one area within the Kings Lynn Power Station which is subject to a leasehold interest registered at HM Land Registry under title number NK179596, of which National Grid Transmission Plc is the registered leasehold proprietor. This area is shown hatched blue on Plan 6A.

THE THREAT

29. Greenpeace is a campaign group with a history of direct action, including against fossil fuel energy installations and RWE group companies.
30. Greenpeace UK has announced, online, that it will be launching its campaign against the “Great Gas Rip-Off” this autumn, inviting people to events on 27 September 2025 and 21 October 2025 with the advertisement for that later event stating “*Join our campaign launch call to hear how you can get involved. Whether you’re a seasoned*

activist or just getting started, everyone's welcome. Let's turn outrage into organising – and show that climate justice is energy justice too”.

31. On 22 September 2025, eight protesters associated with Greenpeace UK entered the Claimant's facility at Staythorpe Power Station in Nottinghamshire. The means of entry are not known with certainty, but the Claimant presumes (and it is probable) that they scaled the perimeter fence, unobserved by the Claimant. They scaled two of the 75m high gas turbine “stacks” and there displayed banners highlighting the Greenpeace UK campaign against the “Great Gas Rip-Off”.
32. That action took place despite Greenpeace UK having met with representatives from the Claimant on 16 September 2025 - at a meeting requested by Greenpeace UK to discuss its concerns - and a subsequent meeting having been arranged for 24 September 2025. At no point did Greenpeace UK give the Claimant any indication that direct action was intended at the Staythorpe Power Station. It has not ruled out taking any similar action in future, even if engagement through dialogue were to continue.

CAUSES OF ACTION

33. The Claimant apprehends that, unless restrained by the Court, the persons unknown who are described as the First Defendants herein will conduct themselves in such a way as to amount to trespass and/or nuisance.
34. Members of the public including the persons unknown who are described as the First Defendants herein have no consent or permission to enter upon any of the six Sites. The Claimant has not given any permission, consent or licence to any person to enter onto any of the six Sites other than in connection with the operation of those facilities, or for the purposes of access to the freehold or leasehold estates situated within the Sites. In particular, it has not given any permission, consent or licence to members of the public to enter onto any of the Sites for the purpose of protest, direct action or other activity associated with Greenpeace UK or otherwise.
35. Any entry onto, occupation of, or remaining on any of the Sites or the damaging or defacing of any part of them (including the perimeter fence) by the Defendants would

therefore constitute a trespass, which the Claimant is entitled to injunctive relief to restrain.

36. The Claimant also seeks injunctive relief in respect of those areas within the respective perimeter fences of the Sites which are hatched blue on the various “A” plans indicated above (being areas in relation to which there subsist leasehold interests, the NE Area at Kings Lynn Power Station, the Bridge at Little Barford Power Station, and the Substation within the Great Yarmouth Power Station) upon the basis that:
 - 36.1 the relief claimed by the Claimant in relation to those areas is no more than is necessary and proportionate in order to give effective protection to its rights as landowner to restrain trespass onto the Power Stations within which they are located; and
 - 36.2 further or alternatively, such relief is required in order to restrain acts of nuisance, or threatened nuisance, within those areas which would interfere with the Claimant’s use and enjoyment of the Power Stations within which they are located, or which would threaten to do so.
37. Reliance by the Defendants of rights of freedom of expression and / assembly under Articles 10 and/or 11 of the European Convention of Human Rights would not provide a defence in the particular circumstances of this case.
38. The Claimant therefore seeks the following Orders:
 - 38.1 An order restraining the Defendants, without the Claimant’s consent, from entering, occupying or remaining upon the land shown edged red on Plans 1 to 6, being the Staythorpe Power Station, Didcot Power Station, Pembroke Power Station, Little Barford Power Station, Great Yarmouth Power Station and Kings Lynn Power Station, and from the damaging or defacing of any part thereof, including the perimeter fence, for the purposes of protest whether in support of any Greenpeace campaign or otherwise.
 - 38.2 Further or other relief as the Court sees fits.
 - 38.3 Costs.

TIMOTHY MORSHEAD KC
JACQUELINE LEAN

STATEMENT OF TRUTH

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.

I am duly authorised by the Claimant to sign this statement.



Signed

Donal Patrick Kelly

Legal Director

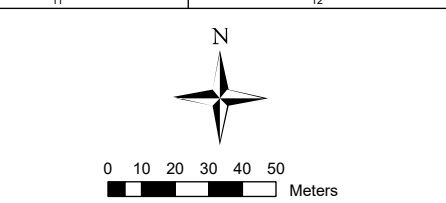
Osborne Clarke LLP

Claimant's Solicitor

Date: 1 October 2025

ANNEX TO PARTICULARS OF CLAIM

Plans 1-6



Key:
— Extent of injunction area (2416m)

MJA	WM	30/09/25	WM	B
Drawn	Checked	Date	Approved	Rev.

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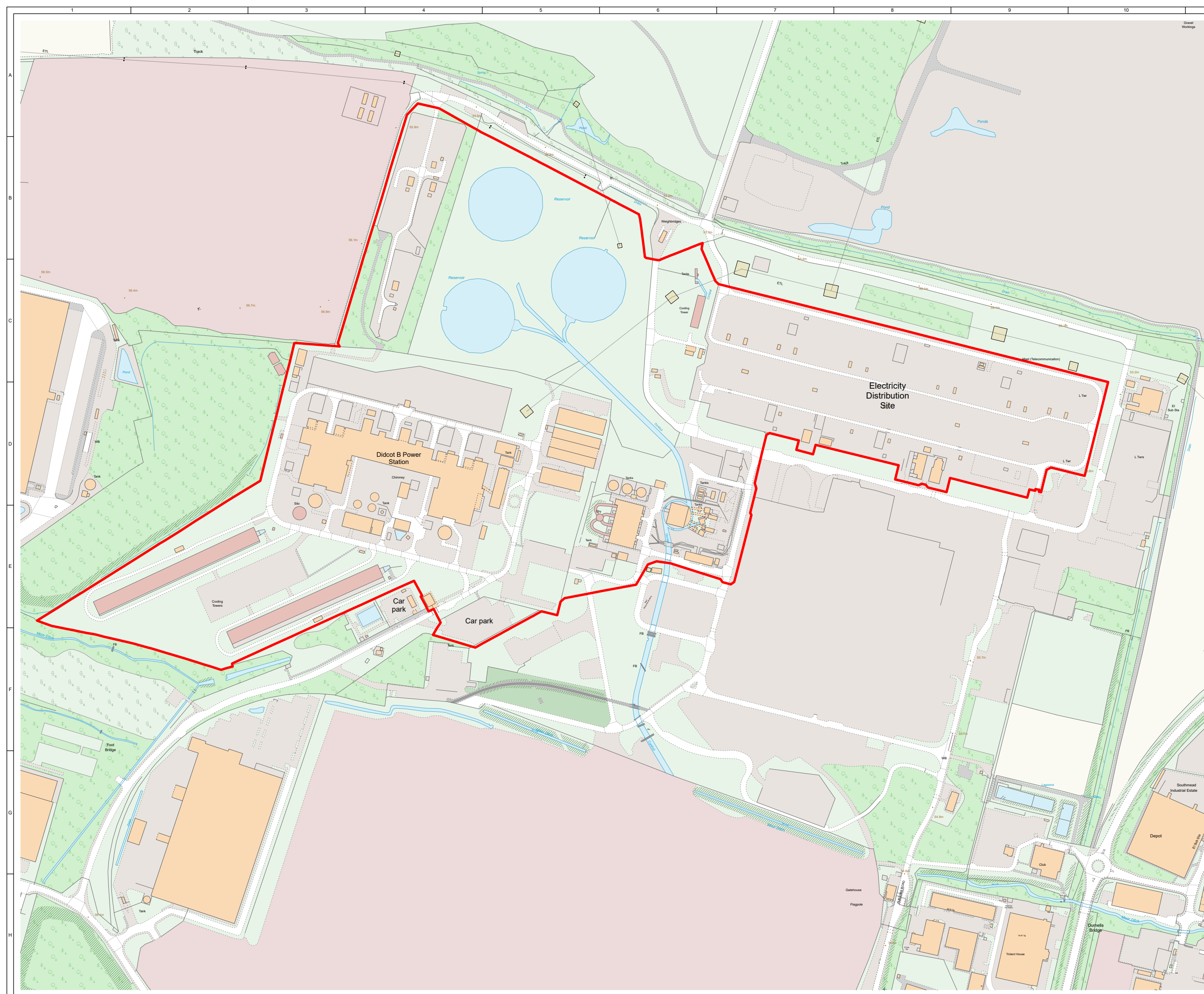
Size of original	Scale of original
A3	1:2,250

Site
STAYTHORPE POWER STATION

Title
**PLAN 1
SITE SECURITY
EXTENT OF
INJUNCTION AREA
PLAN**

Status
FINAL

Drawing Number
RWE/STAYTHORPE/MS/0005/1



N

0

20

40

60

80

100

Meters

Key:

Extent of injunction area (3716m)

MJA

WM

30/09/25

WM

A

Drawn

Checked

Date

Approved

Rev.

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RWE

RWE Generation UK plc

Geospatial Graphics

RWE Generation UK plc

Windmill Hill Business Park

Swindon

SN5 6PB

01793 877777

Size of original

A3

Scale of original

1:4,250

Site

DIDCOT
POWER STATION

Title

PLAN 2
SITE SECURITY
EXTENT OF
INJUNCTION AREA
PLAN

Status

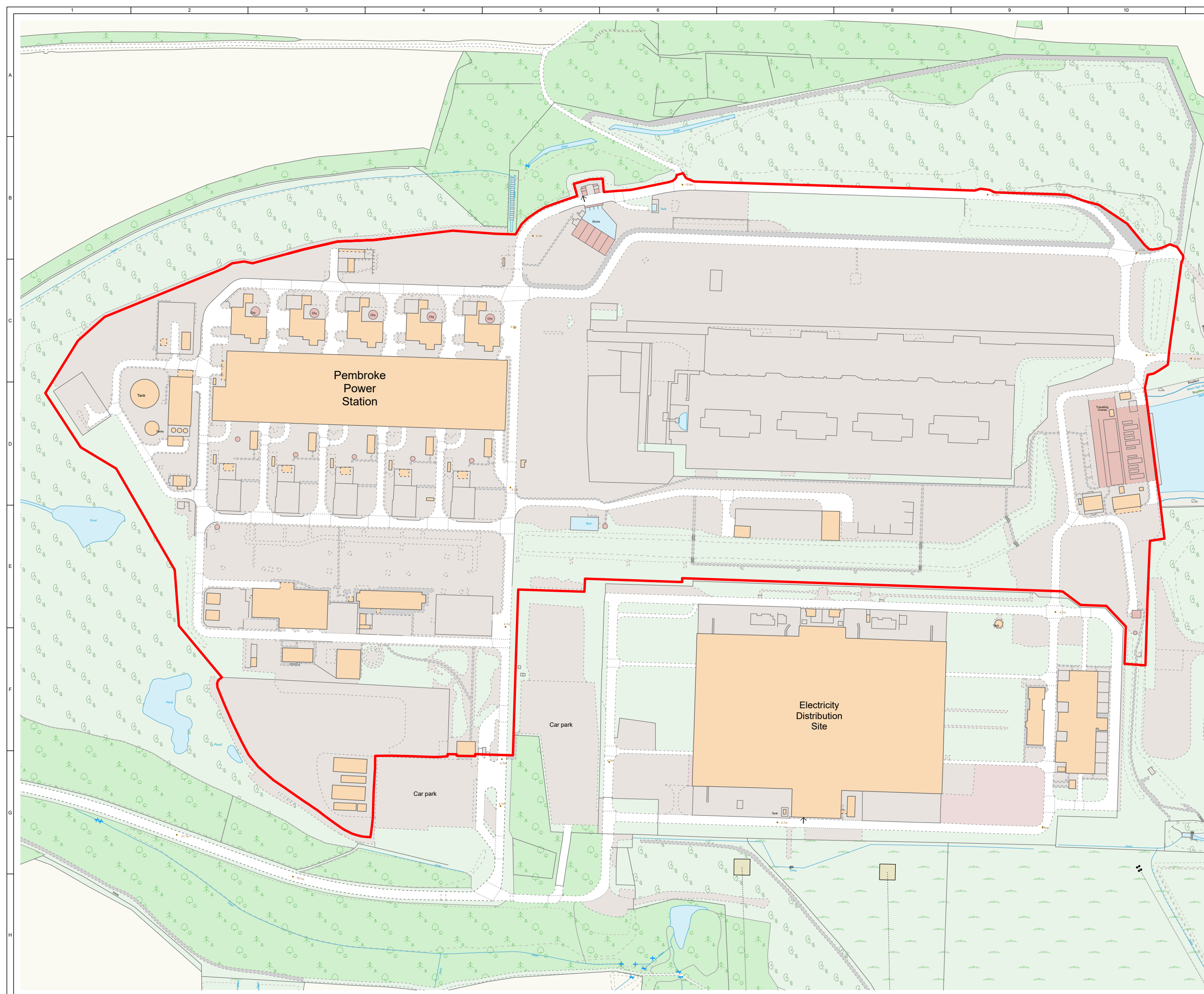
FINAL

Drawing Number

RWE/DIDCOT/PM500612/

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Page 25 of 484



N

0

20

40

60

80

100

Meters

Key:

Extent of injunction area (3059m)

MJA	WM	30/09/25	WM	B
Drawn	Checked	Date	Approved	Rev.
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RWE RWE Generation UK plc Geospatial Graphics RWE Generation UK plc Windmill Hill Business Park Swindon SN5 6PB 01793 877777				
Size of original		Scale of original		
A3		1:3,000		
Site				
PEMBROKE POWER STATION				
Title				
PLAN 3 SITE SECURITY EXTENT OF INJUNCTION AREA PLAN				
Status				
FINAL				
Drawing Number				
RWE/PMARK/MS00611/2				

Page 26 of 484



N

0

10

20

30

40

50

Meters

Key:

Extent of injunction area (2485m)

MJA	WM	30/09/25	WM	B
Drawn	Checked	Date	Approved	Rev.

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RWE

RWE Generation UK plc

Geospatial Graphics

RWE Generation UK plc

Windmill Hill Business Park

Swindon

SN5 6PB

01793 877777

Size of original	Scale of original
A3	1:1,750

Site
LITTLE BARFORD POWER STATION

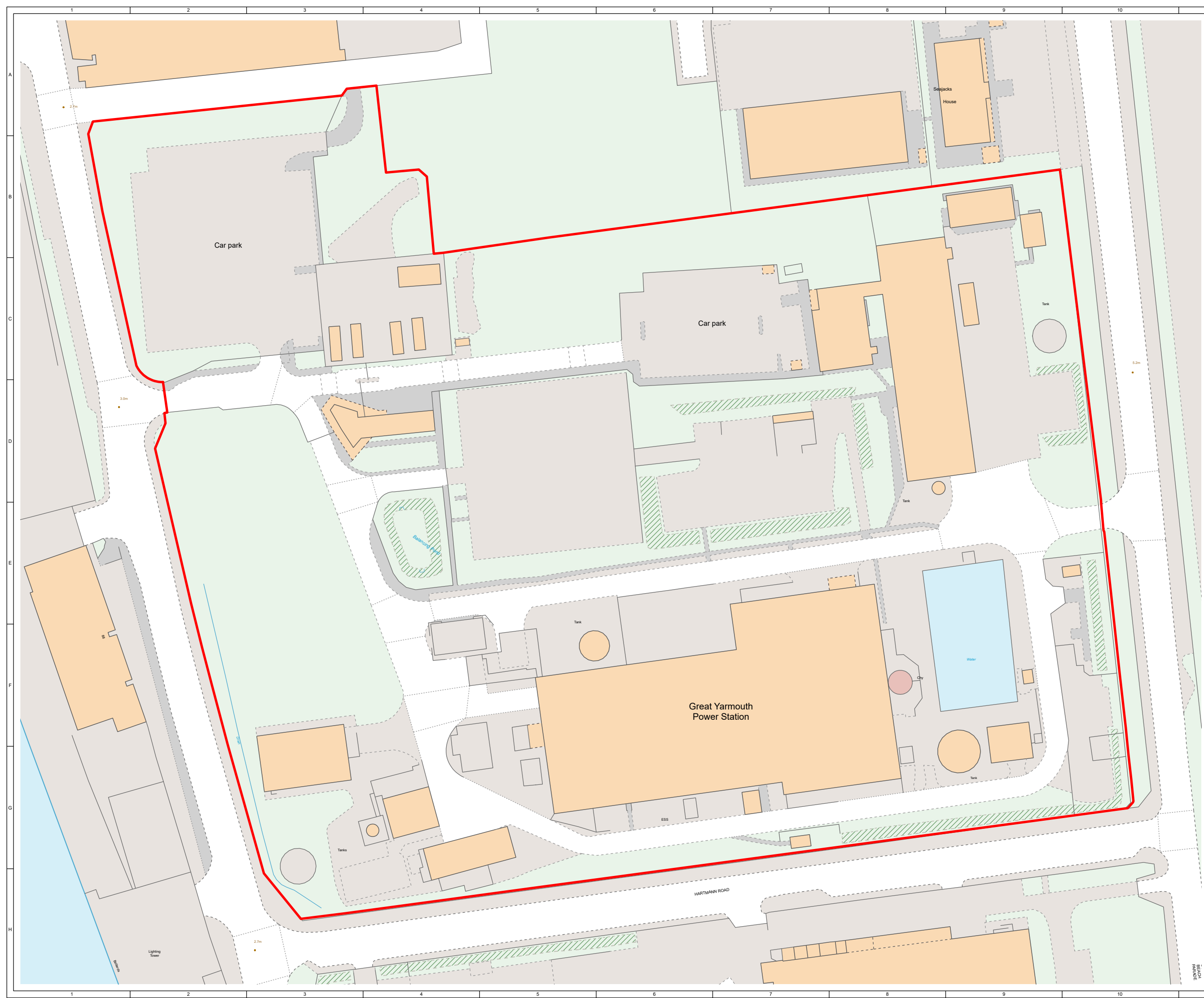
Title
PLAN 4 SITE SECURITY EXTENT OF INJUNCTION AREA PLAN

Status
FINAL

Drawing Number
RWE/PL/PP/PMS/0003/E

Page 27 of 484

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N

0

5

10

15

20

25

Meters

Key:

Extent of injunction area (1020m)

MJA	WM	30/09/25	WM	B
Drawn	Checked	Date	Approved	Rev.

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RWE

RWE Generation UK plc

Geospatial Graphics
RWE Generation UK plc
Windmill Hill Business Park
Swindon
SN5 6PB
01793 877777

Size of original	Scale of original
A3	1:1,000

Site
GREAT YARMOUTH POWER STATION

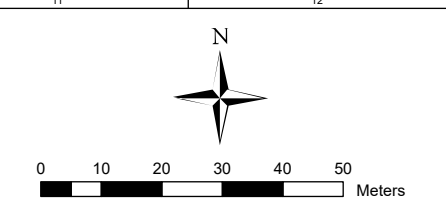
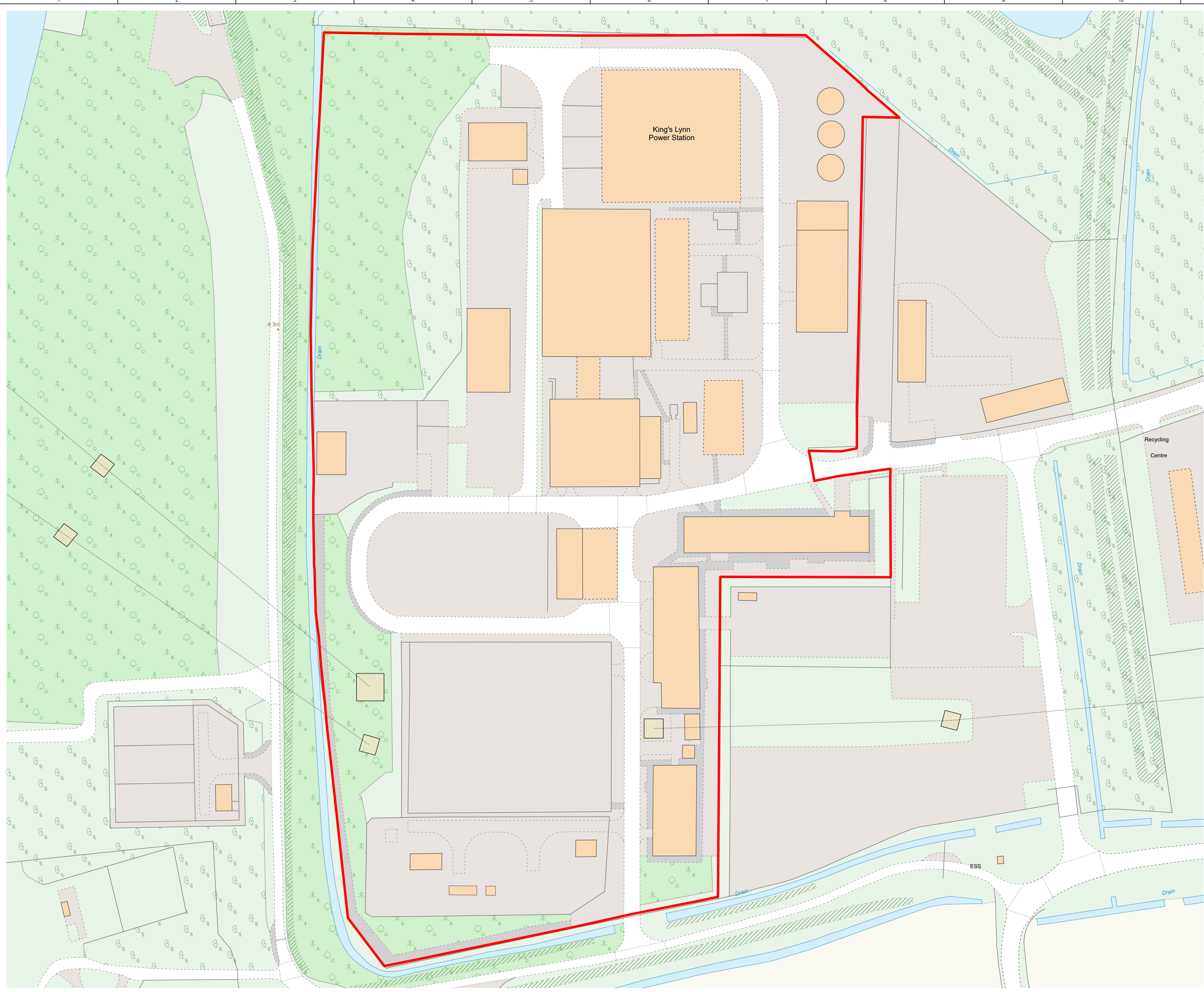
Title
PLAN 5 SITE SECURITY EXTENT OF INJUNCTION AREA PLAN

Status
FINAL

Drawing Number
RWE/GTYRMP/MS0004/4

Page 28 of 484

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Key:
Extent of injunction area (1097m)

MJA	WM	30/09/25	WM	B
Drawn	Checked	Date	Approved	Rev.

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RWE RWE Generation UK plc

Geospatial Graphics
RWE Generation UK plc
Windmill Hill Business Park
Swindon
SN5 6PB
01793 877777

Size of original	Scale of original
A3	1:1,250

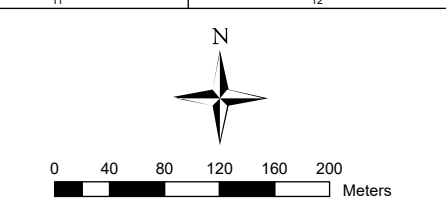
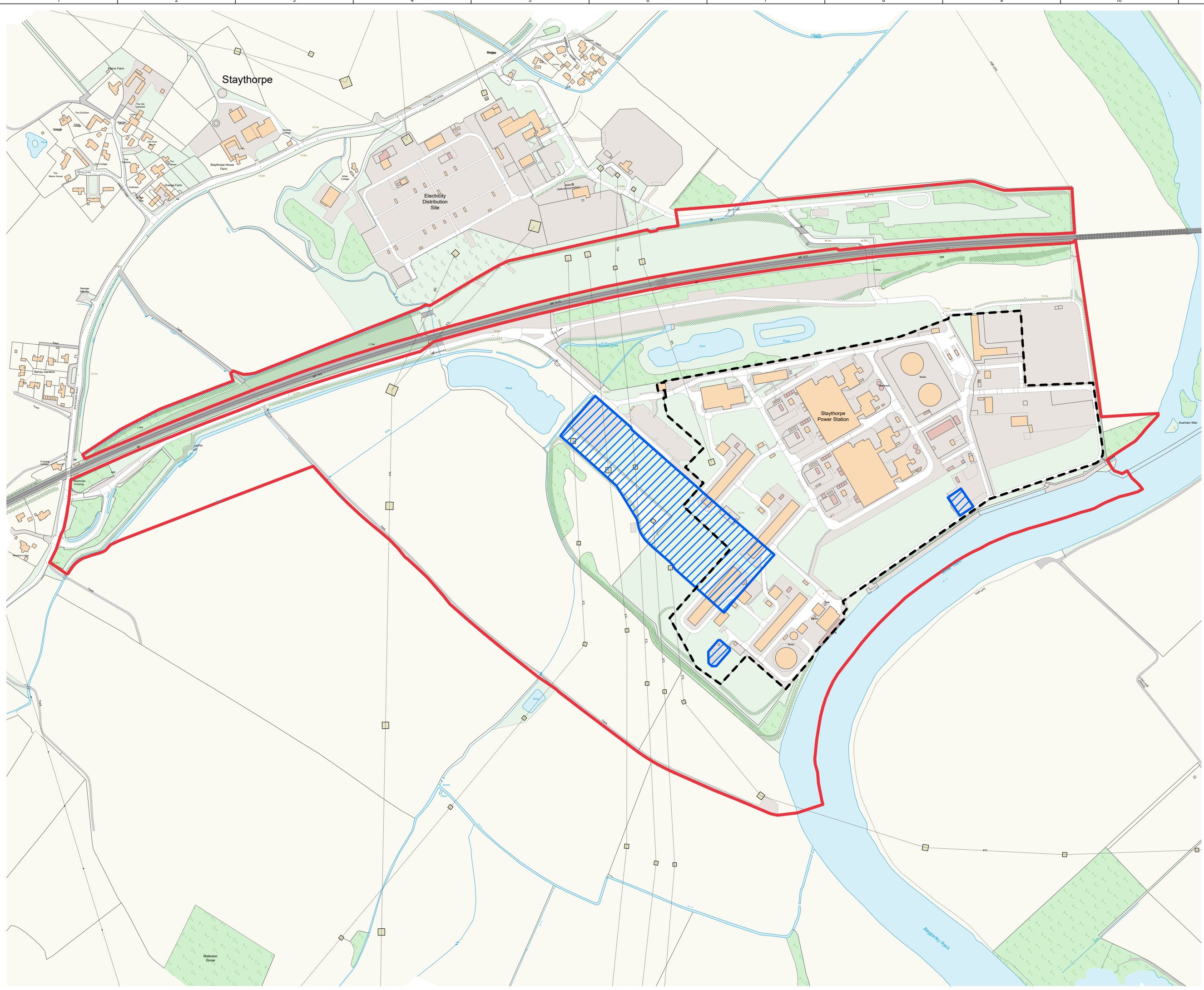
Site
**KINGS LYNN
POWER STATION**

Title
**PLAN 6
SITE SECURITY
EXTENT OF
INJUNCTION AREA
PLAN**

Status
FINAL

Drawing Number
RWE/KINGS LYNN/PS/00003/1

Plans 1A, 2A, 4A, 5A and 6A



- Key:**
- RWE ownership boundary (86.61ha)
 - Leasehold boundaries (4.19ha)
 - Main security boundary (2416m)

MJA	WM	30/09/25	WM	B
Drawn	Checked	Date	Approved	Rev.

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RWE Generation UK plc

Geospatial Graphics
RWE Generation UK plc
Windmill Hill Business Park
Swindon
SN5 6PB
01793 877777

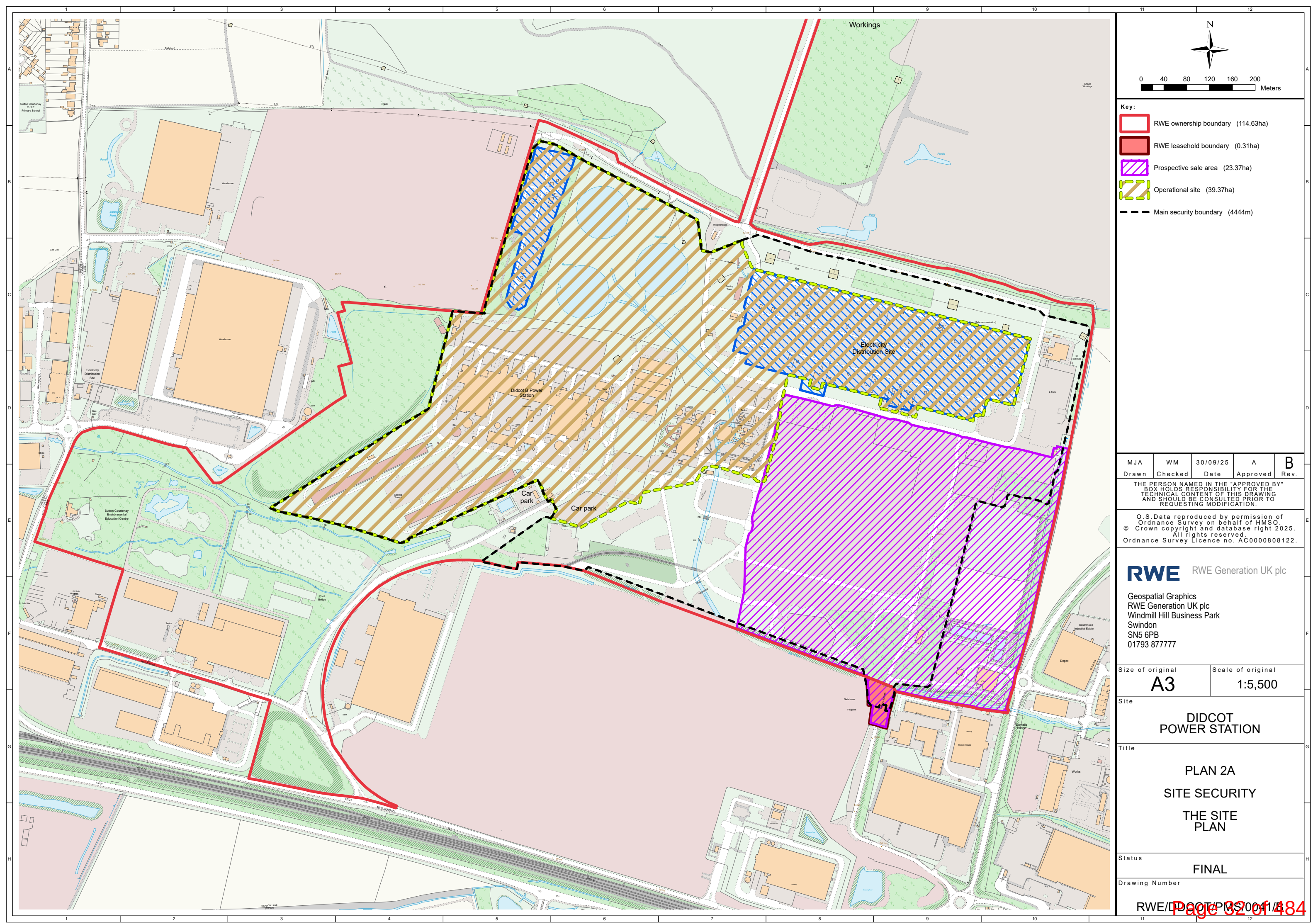
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A3	1:5,500

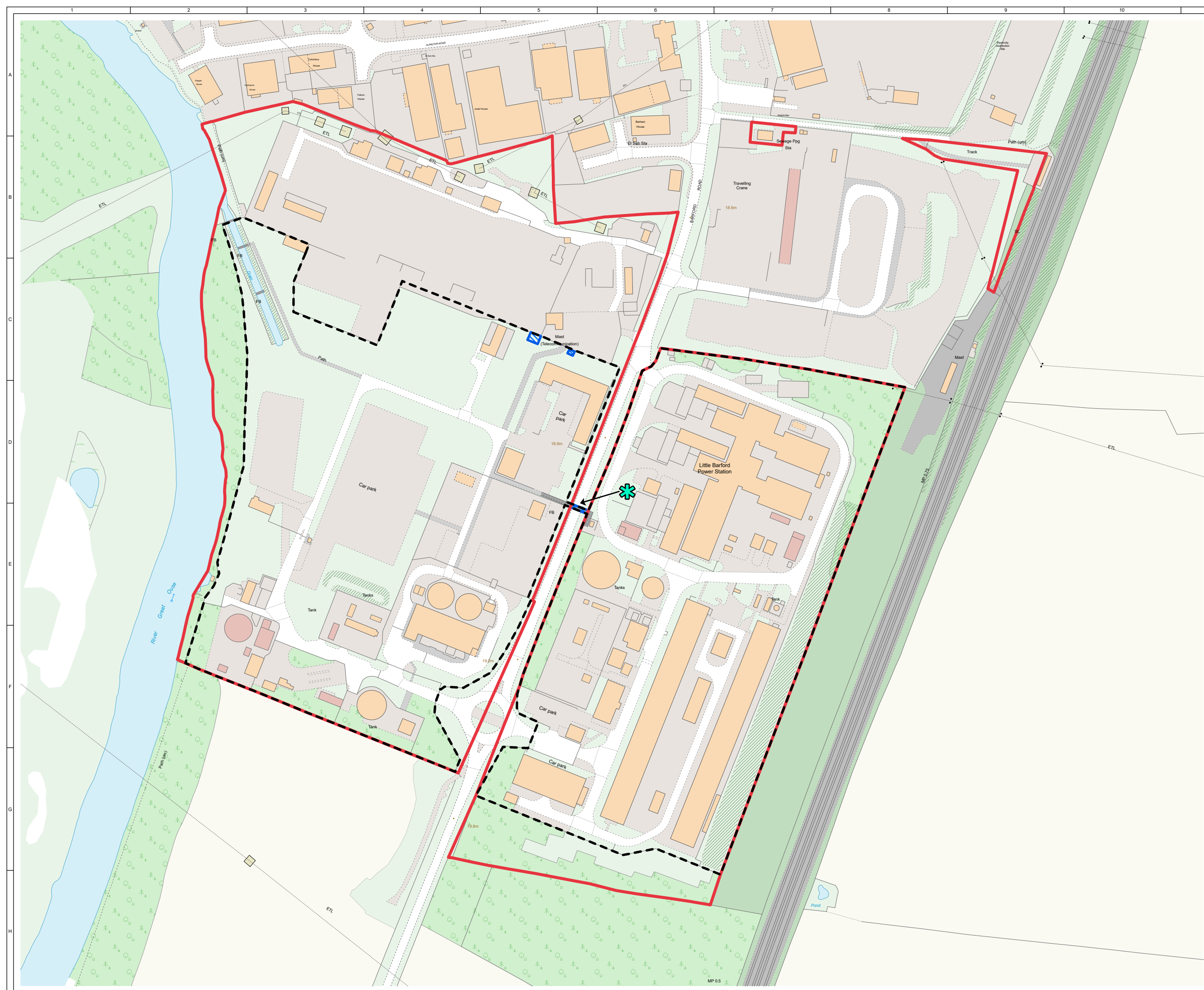
Site
**STAYTHORPE
POWER STATION**

Title
**PLAN 1A
SITE SECURITY
THE SITE
PLAN**

Status
FINAL

Drawing Number
RWE/STYTH/PMS10004/E





N

0

20

40

60

80

100

Meters

Key:

RWE ownership boundary (19.71ha)

Third Party Areas

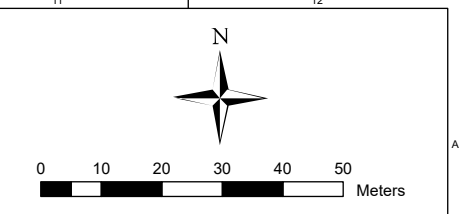
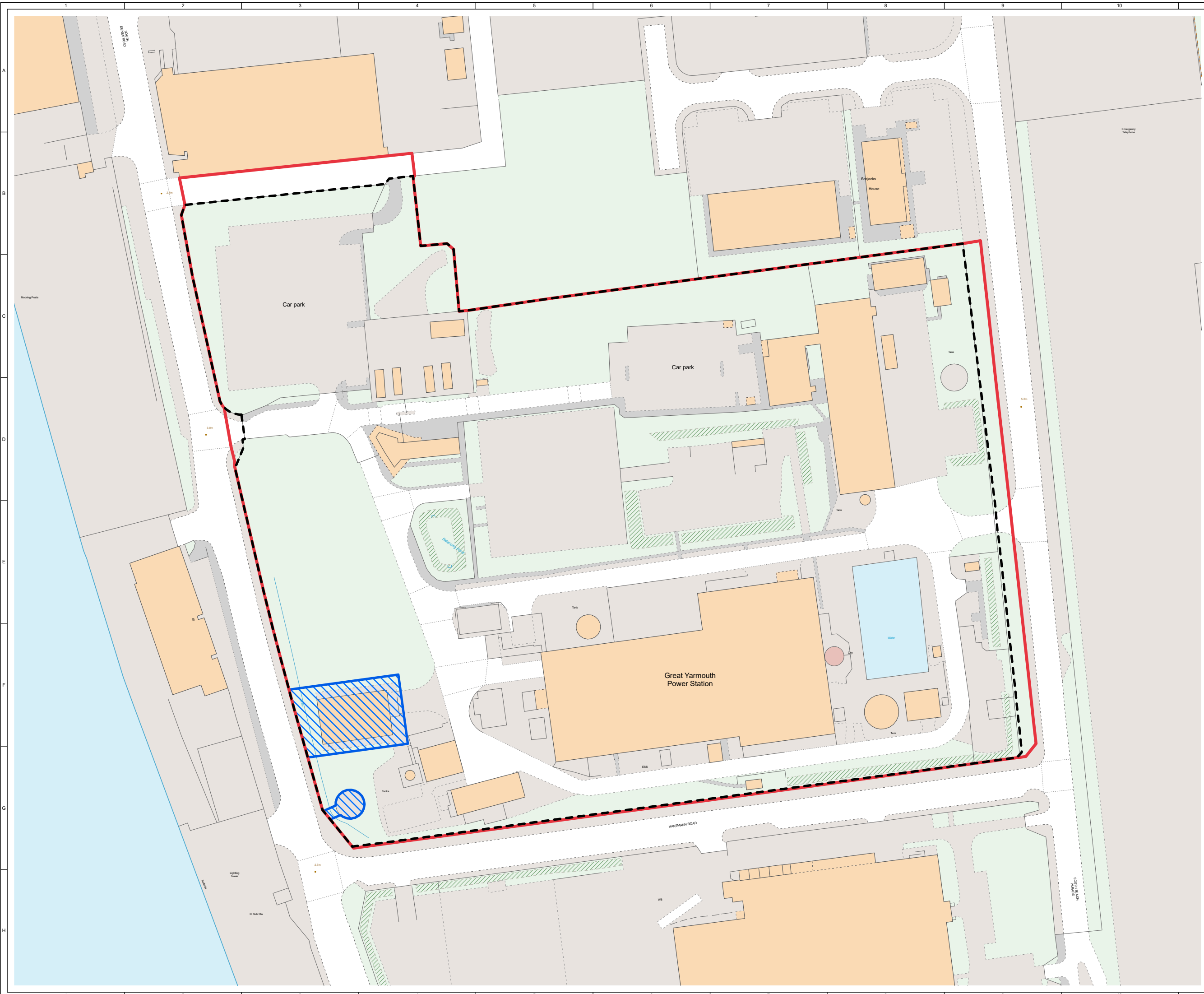
Main security boundary (2485m)

Location of Little Barford footbridge

MJA	WM	30/09/25	WM	D
Drawn	Checked	Date	Approved	Rev.
THE PERSON NAMED IN THE "APPROVED BY" BOX HOLDS RESPONSIBILITY FOR THE TECHNICAL CONTENT OF THIS DRAWING AND SHOULD BE CONSULTED PRIOR TO REQUESTING MODIFICATION.				
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RWE RWE Generation UK plc Geospatial Graphics RWE Generation UK plc Windmill Hill Business Park Swindon SN5 6PB 01793 877777				
Size of original		Scale of original		
A3		1:2,500		
Site				
LITTLE BARFORD POWER STATION				
Title				
PLAN 4A SITE SECURITY THE SITE PLAN				
Status				
FINAL				
Drawing Number				
RWE/PL/PP/MS/0001/D				

Page 33 of 484

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- Key:
- RWE ownership boundary (5.73ha)
 - Leasehold boundaries (0.11ha)
 - Main security boundary (1020m)

MJA	WM	30/09/25	WM	B
Drawn	Checked	Date	Approved	Rev.

THE PERSON NAMED IN THE "APPROVED BY" BOX HOLDS RESPONSIBILITY FOR THE TECHNICAL CONTENT OF THIS DRAWING AND SHOULD BE CONSULTED PRIOR TO REQUESTING MODIFICATION.

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 RWE Generation UK plc

Geospatial Graphics
RWE Generation UK plc
Windmill Hill Business Park
Swindon
SN5 6PB
01793 877777

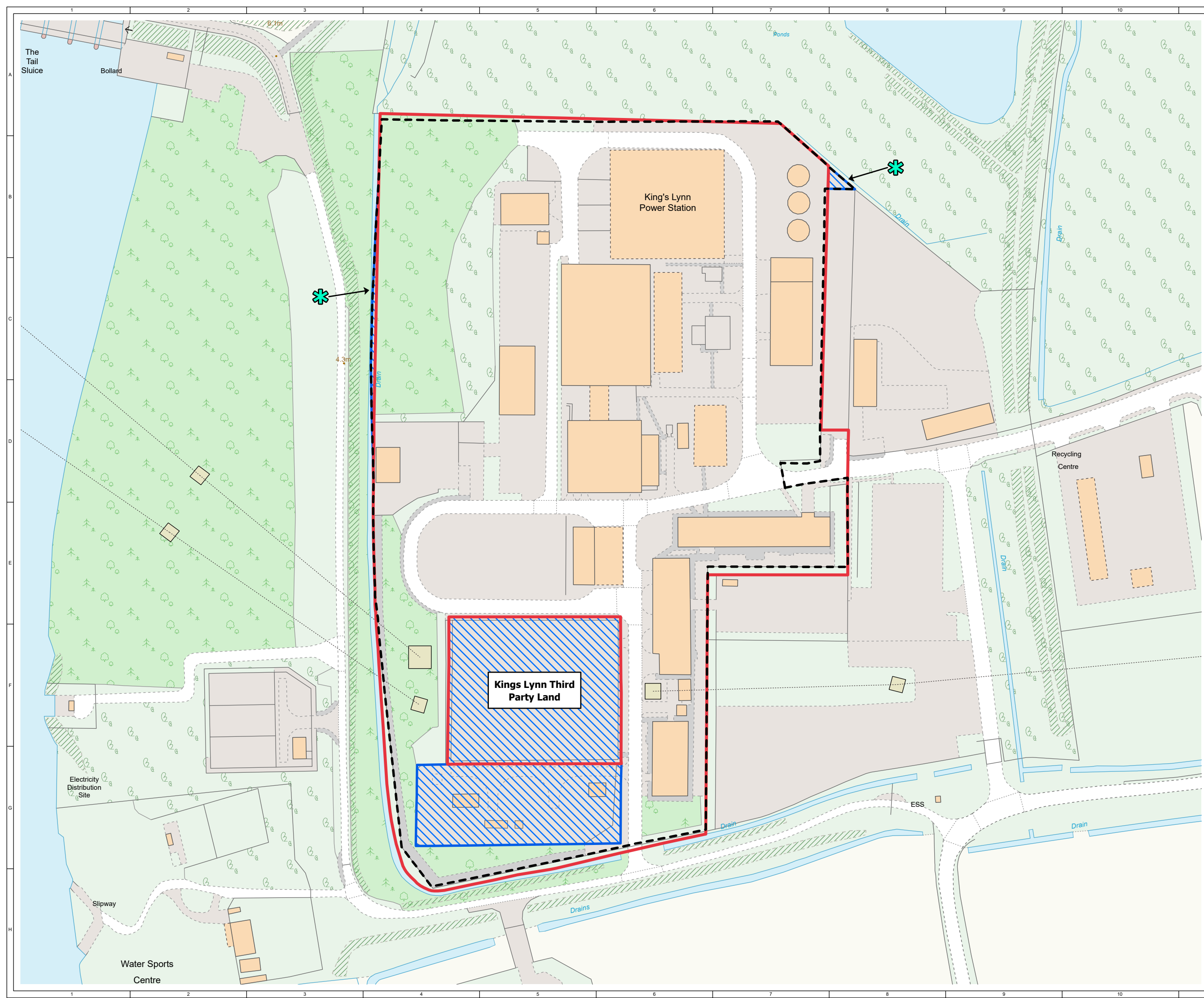
Size of original	Scale of original
A3	1:1,250

Site
**GREAT YARMOUTH
POWER STATION**

Title
**PLAN 5A
SITE SECURITY
THE SITE
PLAN**

Status
FINAL

Drawing Number
RWE/GYRMP/MS/0003/4



N

0

10

20

30

40

50

Meters

Key:

RWE ownership boundary (5.39ha)

Third Party Areas

Main security boundary (1097m)

Location of Indeterminate Ownership Land

MJA	WM	30/09/25	WM	E
Drawn	Checked	Date	Approved	Rev.

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RWE

RWE Generation UK plc

Geospatial Graphics
RWE Generation UK plc
Windmill Hill Business Park
Swindon
SN5 6PB
01793 877777

Size of original

A3

Scale of original

1:1,500

Site

KINGS LYNN
POWER STATION

Title

PLAN 6A
SITE SECURITY
THE SITE
PLAN

Status

FINAL

Drawing Number

RWE/KINGLYN/PM5/0002/1

Page 35 of 484

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IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)



Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR 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.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it 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.

BEFORE the Honourable Mr Justice Trower on 24 October 2025

UPON the Claimants having issued this Claim by a Claim Form dated 1 October 2025

AND UPON the Claimant's application for an ex parte interim injunction by Application Notice dated 1 October 2025

AND UPON interim injunctive relief having been granted at an ex parte hearing by the Honourable Mr Justice Rajah on 3 October 2025

AND UPON the Claimants seeking continuation of the interim injunctive relief granted on 3 October 2025

AND UPON the Second Defendant and Greenpeace Limited (which is joined to these proceedings as Third Defendant for the purpose of giving the undertaking hereinafter referred to) having agreed terms including undertakings provided by those Defendants to the Court on 24 October 2025 annexed to this Order at Schedule 4 ("the Undertakings")

AND UPON the Court having accepted the Undertakings

AND UPON READING the Witness Statements of Rachel Jane Smith dated 1 October 2025, William Henry Jeffery dated 1 October 2025, and Donal Patrick Kelly dated 20 October 2025

AND UPON HEARING Timothy Morshead KC and Jacqueline Lean for the Claimant

AND UPON the Claimant giving and the Court accepting the undertakings set out in Schedule 1 to this Order

IT IS ORDERED THAT:

INJUNCTION

1. The First Defendants must not enter, occupy or remain on, or damage or deface any part (including the perimeter fence), of the land and premises shown edged red on Plans 1 to 6 to this Order, being:
 - (i) Staythorpe Power Station, Staythorpe, Newark, NG23 5RQ, as shown edged red on Plan 1;
 - (ii) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - (iii) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - (iv) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - (v) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5.
 - (vi) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6.
2. In respect of anything prohibited by paragraph 1 above, the First Defendants must not (a) do it himself/herself/themselves in any other way or (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

REVIEW

3. The injunction set out at paragraphs 1 and 2 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant shall file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days

before the hearing. The injunction set out at paragraphs 1 and 2 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place, such application to be made not less than 3 months before the date on which the injunction would otherwise lapse. Provided such application is made not less than 3 months before the anniversary of the order (or as the case may be the latest annual review) the Court shall list the review hearing on or before the date on which the injunction set out at paragraphs 1 and 2 of this Order would otherwise lapse.

SERVICE AND NOTIFICATION

4. Service of this Order on the First Defendant is dispensed with, pursuant to CPR 6.28 and 81.4(2)(c).
5. This Order be notified to the First Defendants by the Claimant carrying out each of the following steps:
 - (i) Uploading a copy on to the following website: <https://uk.rwe.com/injunction>
 - (ii) Affixing a copy of the Order in A4 size in a clear plastic envelope at prominent locations at each of the Sites shown edged red on Plans 1 to 6.
 - (iii) Affixing warning notices of A2 size at those locations at each of the sites shown edged red on Plans 1 to 6, substantially in the form of the notice at Schedule 3.
6. Notification to the First Defendants of any further applications or documents shall be effected by the Claimants carrying out each of the following steps:
 - (i) Uploading a copy of the application on to the following website: <https://uk.rwe.com/injunction>

- (ii) Affixing notices at or near the aforesaid prominent locations at the relevant Site/s shown edged red on Plans 1-6, stating that the application has been made or document/s provided and where the application or document/s can be accessed in hard copy and online.
- 7. In respect of paragraphs 5 and 6 above, effective notification will be deemed to have taken place in relation to each Site on the date on which all the relevant steps have been carried out.
- 8. For the avoidance of doubt, in respect of the steps referred to at paragraphs 5(ii), 5(iii), and 6(ii), effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed or defaced without the Claimant's consent.
- 9. The Claimant shall use reasonable endeavours to maintain and as the case may be replace the documents in their fixed positions and in legible form.
- 10. In relation to the Second Defendant: pursuant to CPR rule 6.27, the Claimant has permission to serve the Second Defendant with this Order and any further applications or documents in the Claim by email to:
 - (i) exuk@greenpeace.org; and
 - (ii) jack.robirosa@greenpeace.org
- 11. In relation to the Third Defendant: pursuant to CPR rule 6.27, the Claimant has permission to serve the Third Defendant with this Order and any further applications or documents in the Claim by email to:
 - (i) exuk@greenpeace.org; and
 - (ii) jack.robirosa@greenpeace.org
- 12. The deemed date of service of any documents referred to in paragraphs 10 and 11 above shall be the day on which service is completed in accordance with paragraph 10 or 11 above.

13. The Claimant shall use reasonable endeavours to notify the owners (where known) of the areas of land shown hatched blue on Plans 1A, 2A, 4A, 5A and 6A at Annexure 2 to the Particulars of Claim of this Order by not later than 5pm on 31 October 2025.

VARIATION

14. Anyone interested may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant 48 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant at least 24 hours in advance of any hearing.
15. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
16. The Claimant has liberty to apply to vary this Order.

OTHER ORDERS

17. The Third Defendant is joined as a party to this claim pursuant to the Claimant's application dated 23 October 2025.
18. It shall be sufficient for the Claimant to notify the First Defendant of the application dated 23 October 2025 by undertaking the step specified in paragraph 6(i) of this Order, namely by uploading a copy of the application on to the following website: <https://uk.rwe.com/injunction>.

COSTS

19. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

20. The Claimant's solicitors and their contact details are:

- (i) Carl Roche of Osborne Clarke LLP, email: carl.roche@osborneclarke.com
- (ii) Donal Kelly of Osborne Clarke LLP, email: donal.kelly@osborneclarke.com

Osborne Clarke LLP, One London Wall, London, EC2Y 5EB

COMMUNICATIONS WITH THE COURT

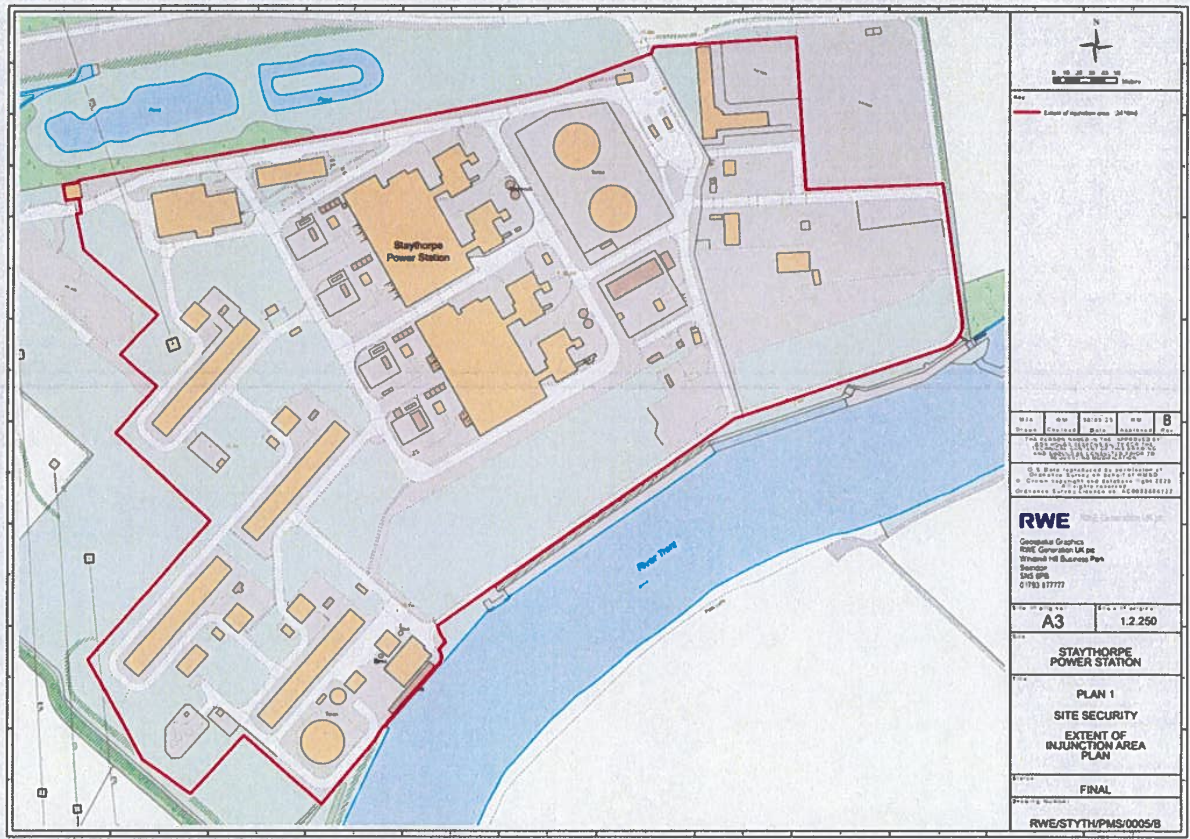
Chancery Division, The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL by
the Court's e-filing service at <https://efile.cefile-app.com>

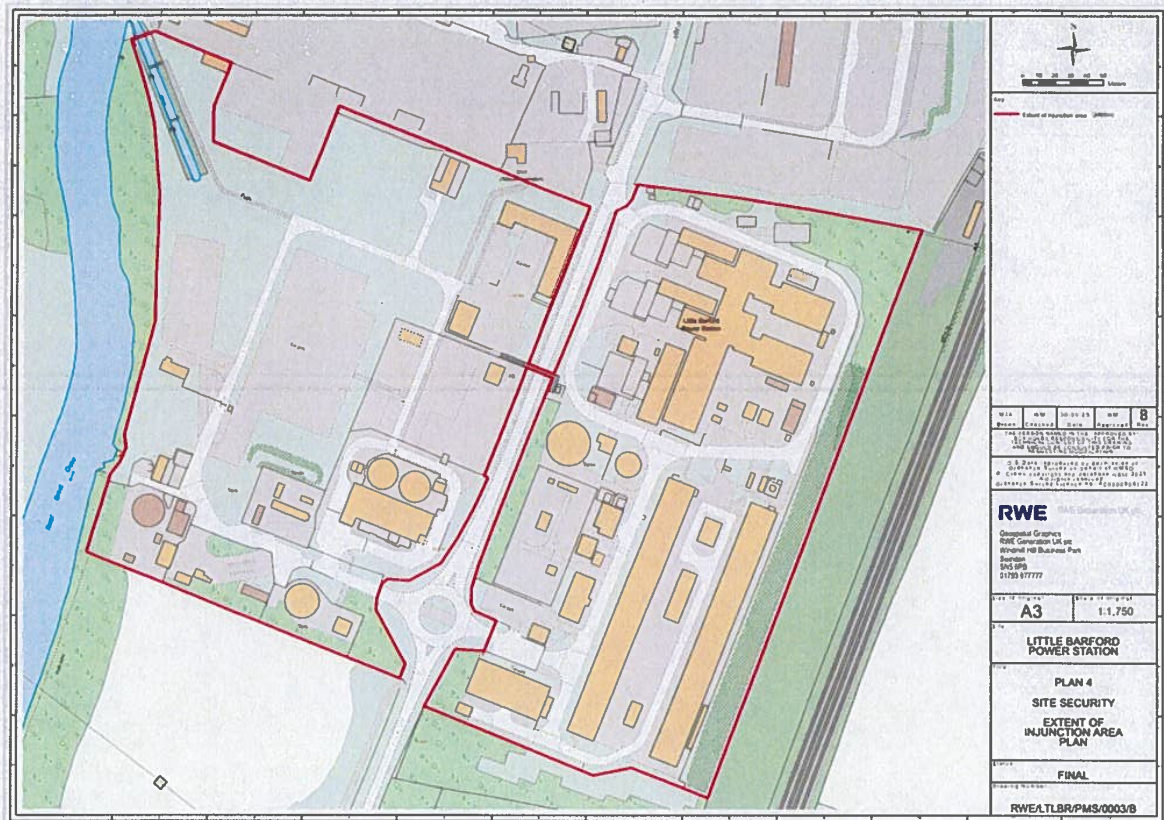
Dated: 24 October 2025

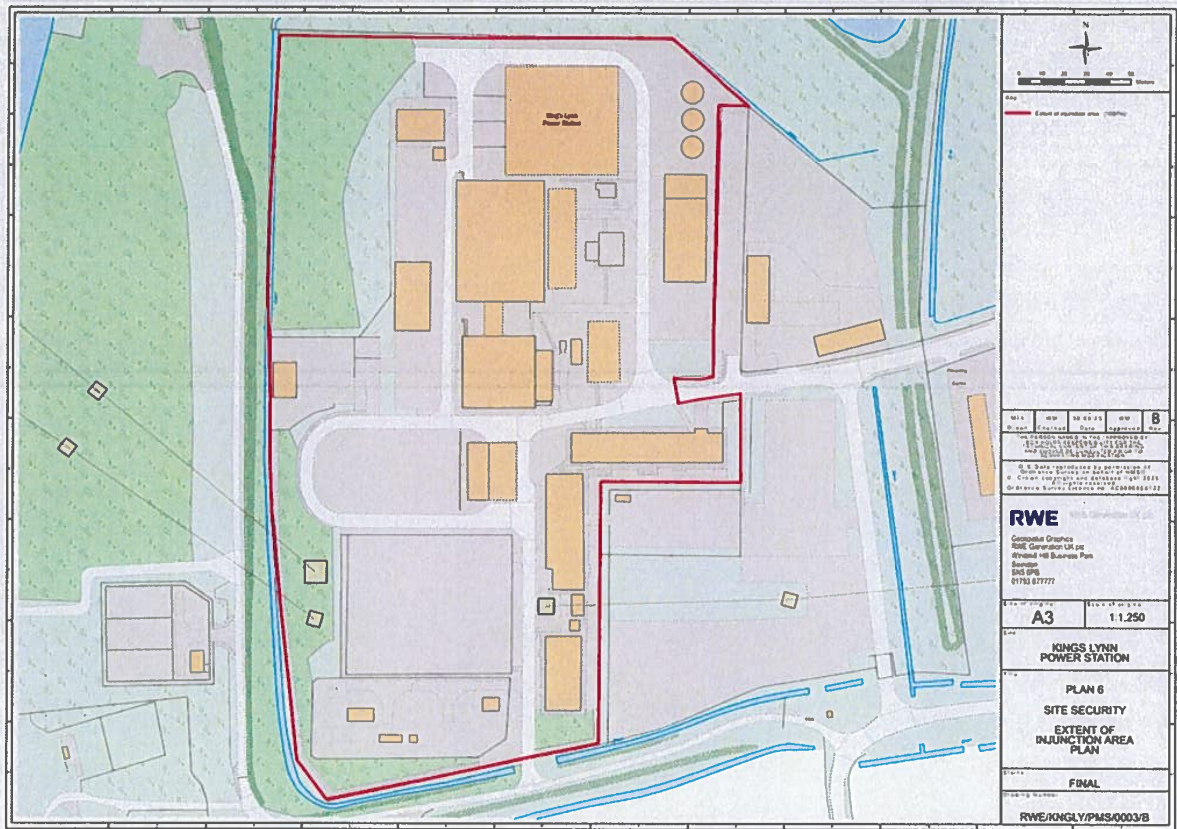
SCHEDULE 1 – CLAIMANT’S UNDERTAKINGS

1. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraphs 1 or 2 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 2 – PLANS







SCHEDULE 3– WARNING NOTICE

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 2025 exists relating to the land and premises known as

The injunction means you may not:

**FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR
DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE)
OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN
BEING**

[Plan]

**ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING
ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE
HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED
OR HAVE THEIR ASSETS SEIZED**

A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing injunctions@osborneclarke.com

**SCHEDULE 4 – UNDERTAKINGS GIVEN BY THE SECOND AND THIRD
DEFENDANTS**

Claim No: PT-2025-001017

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PROPERTY, TRUST AND PROBATE LIST



BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)

Claimant

and

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR
REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE
OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES
OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR
OTHERWISE.**

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

**IF YOU THE WITHIN THIRD DEFENDANT BREACH THE UNDERTAKING OFFERED BY YOU
HEREIN OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THAT UNDERTAKING, YOU
MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE
YOUR ASSETS SEIZED.**

RECITALS

- A. On 3 October 2025, the court made an order on an ex parte basis restraining the Second Defendant from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises as set out in paragraph 1 of that order (the "Interim Order").
- B. The Interim Order was sealed by the court on 6 October 2025.

- C. The return date hearing is listed for 24 October 2025.
- D. The Third Defendant, without admission of liability, is willing to give an undertaking to the court on substantially the same terms as the Interim Order.
- E. The Claimant is willing to settle the Claim against the Third Defendant on the basis of the undertaking and the terms set out below.

Undertaking to the Court

1. Until the date 12 months from the date of this order or until further order of the court, whichever is earlier, the Third Defendant undertakes to the court that the Third Defendant will not:
 - i. enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the land and premises shown edged red on Plans 1 to 6 to this order, being:
 - a) Staythorpe Power Station, Staythorpe, Newark, NG23 5PS, as shown edged red on Plan 1;
 - b) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - c) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - d) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - e) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5; and
 - f) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6; and
 - ii. in respect of anything prohibited by paragraph i above, (a) do it himself / herself / themselves in any other way or (b) do it by means of another person acting on his / her / their behalf, or acting on his / her / their instructions.

Duration, Liberty to Apply and Variations

2. The undertaking shall take effect immediately and shall continue until the date 12 months from the date of this order or until further order of the court, whichever is earlier.
3. Upon the making of this Order, the Claim against the Third Defendant shall be stayed except for the purpose of giving effect to its terms and to the Third Defendant's undertaking.
4. Subject to the Third Defendant having complied with its undertaking and the terms of this Order, the claim against the Third Defendant shall be dismissed with no order as to costs on the date 12 months from the date of this Order.

Service

5. Service of this order may be effected by email to jack.robirosa@greenpeace.org and exuk@greenpeace.org.

Costs

5. There be no order as to the costs of and occasioned by this order and the undertaking recorded herein.

Statement of Acknowledgment by the Third Defendant

The Third Defendant understands that the undertaking above has the same force and effect as an order of the court. The Third Defendant understands that if it breaches this undertaking it may be held in contempt of court and may be imprisoned, fined and / or have its assets seized. The Third Defendant confirms that it has been advised that it should seek legal advice. The Third Defendant confirms that it understands the meaning and effect of the undertaking.

Signed: Jack Robirosa

Name: Jack Robirosa

For and on behalf of the Third Defendant

Date: 24 October 2025

OR

Signed: _____

[Solicitors' name], Solicitors for the Third Defendant

[Address, reference, email, telephone]

Date:

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

Before: The Honourable Mr Justice Trower

Dated: 24 October 2025

BETWEEN:

RWE GENERATION UK PLC

(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED

(Company registration number 02463348)

(3) GREENPEACE LIMITED

(Company registration number 01314381)

Defendants

ORDER

The Court accepts the undertakings given by the Third Defendant in the Order hereby approved and attached, but any director of the Third Defendant desiring to contend that the person signing the undertaking on its behalf was not authorised to do so may apply for that purpose by not later than 4pm on 29 October 2025.

Judge's Endorsement

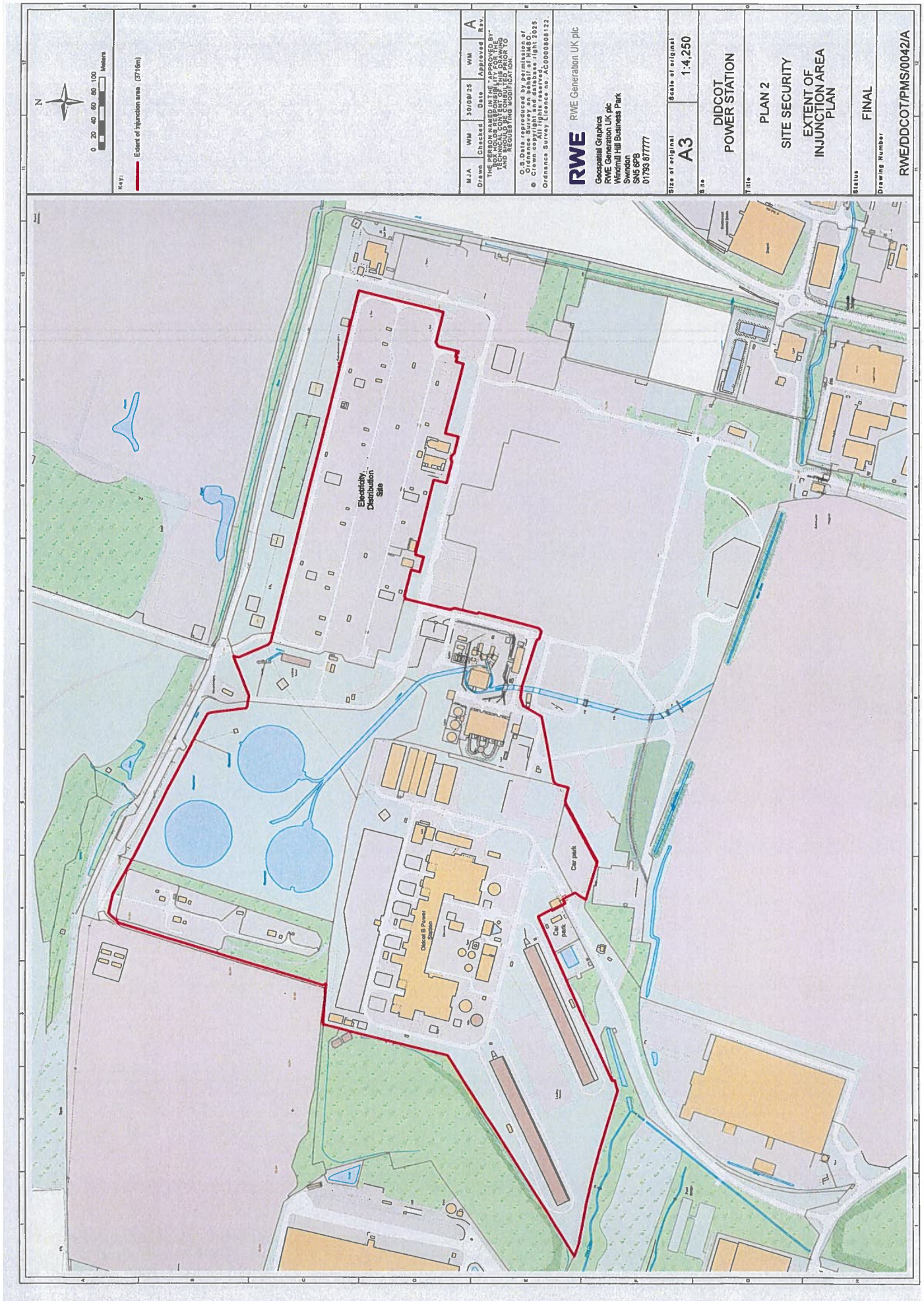
The Court notes and accepts the undertakings given by the Third Defendant recorded above.

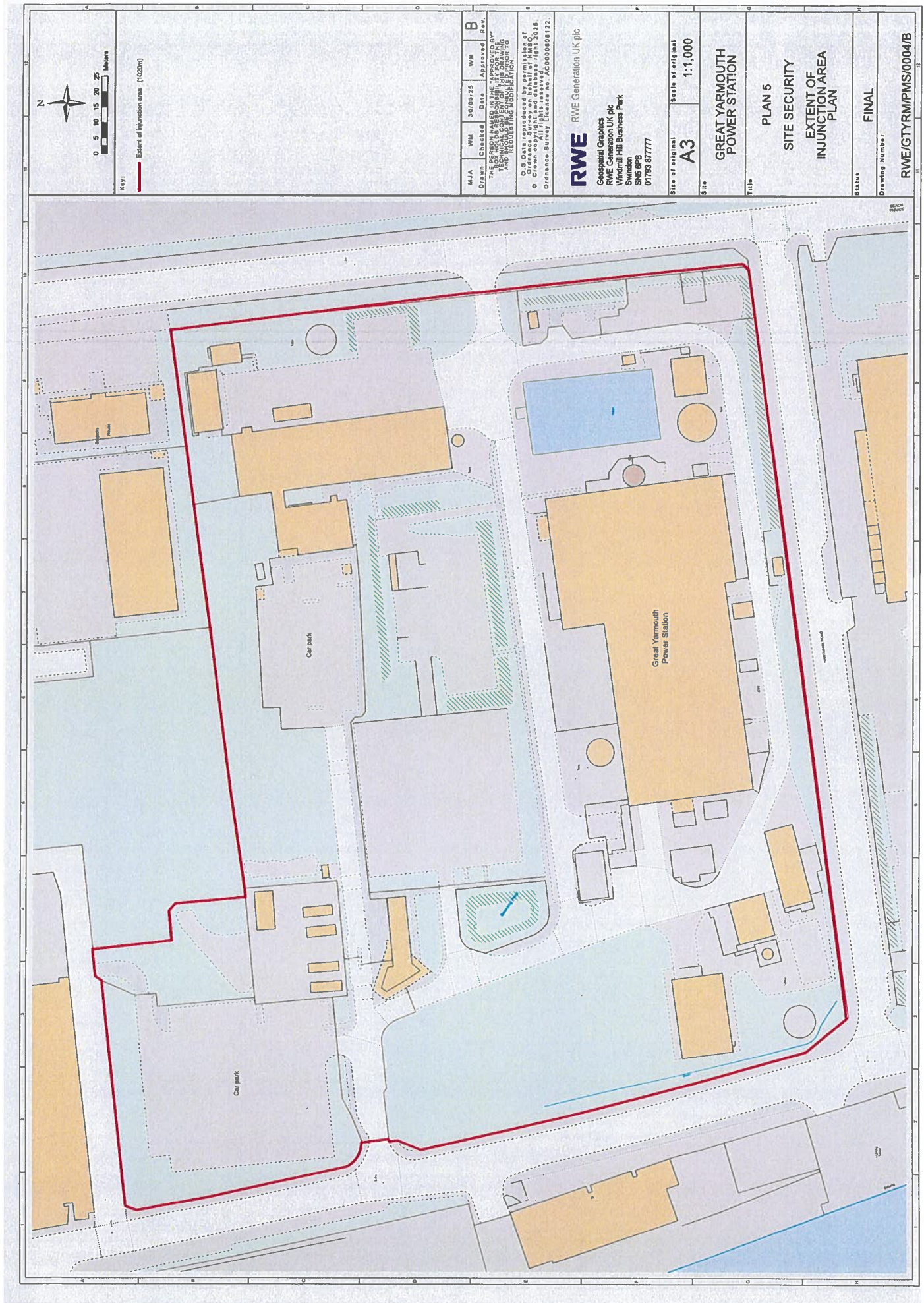
Dated: 24 October 2025

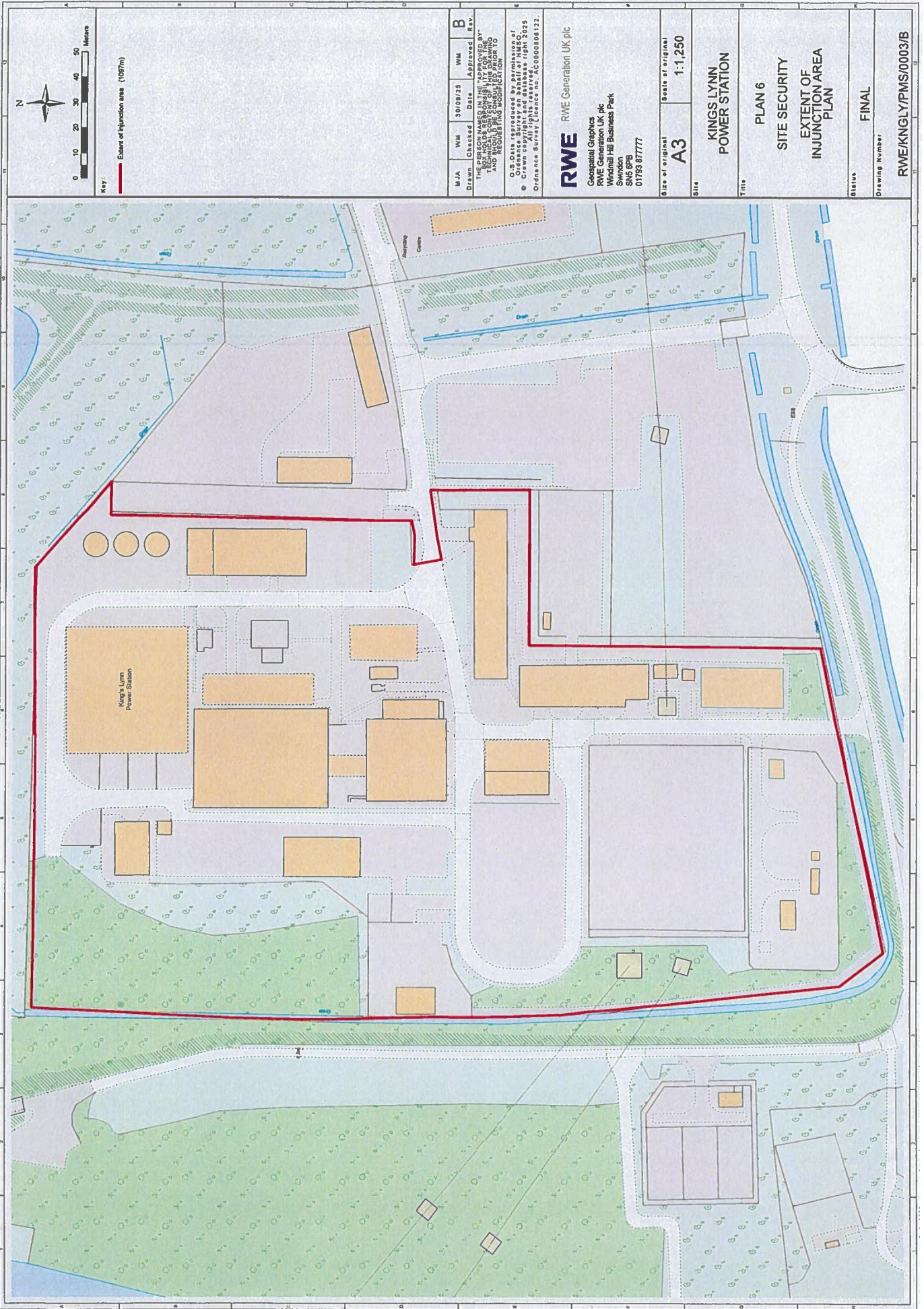
Judge: *Alison*

SCHEDULE 1: PLANS 1-6









IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PROPERTY, TRUST AND PROBATE LIST



BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)

Claimant

and

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR
REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE
OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES
OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR
OTHERWISE.**

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

**IF YOU THE WITHIN SECOND DEFENDANT BREACH THE UNDERTAKING OFFERED BY YOU
HEREIN OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THAT UNDERTAKING, YOU
MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE
YOUR ASSETS SEIZED.**

RECITALS

- A. On 3 October 2025, the court made an order on an ex parte basis restraining the Second Defendant from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises as set out in paragraph 1 of that order (the "Interim Order").

- B. The Interim Order was sealed by the court on 6 October 2025.
- C. The return date hearing is listed for 24 October 2025.
- D. The Second Defendant, without admission of liability, is willing to give an undertaking to the court on substantially the same terms as the Interim Order.
- E. The Claimant is willing to settle the Claim against the Second Defendant on the basis of the undertaking and the terms set out below.

Undertaking to the Court

1. Until the date 12 months from the date of this order or until further order of the court, whichever is earlier, the Second Defendant undertakes to the court that the Second Defendant will not:
 - i. enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the land and premises shown edged red on Plans 1 to 6 to this order, being:
 - a) Staythorpe Power Station, Staythorpe, Newark, NG23 5PS, as shown edged red on Plan 1;
 - b) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - c) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - d) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - e) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5; and
 - f) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6; and
 - ii. in respect of anything prohibited by paragraph i above, (a) do it himself / herself / themselves in any other way or (b) do it by means of another person acting on his / her / their behalf, or acting on his / her / their instructions.

Duration, Liberty to Apply and Variations

2. The undertaking shall take effect immediately and shall continue until the date 12 months from the date of this order or until further order of the court, whichever is earlier.
3. Upon the making of this Order, the Claim against the Second Defendant shall be stayed except for the purpose of giving effect to its terms and to the Second Defendant's undertaking.
4. Subject to the Second Defendant having complied with its undertaking and the terms of this Order, the claim against the Second Defendant shall be dismissed with no order as to costs on the date 12 months from the date of this Order.

Service

5. Service of this Order on the Second Defendant may be effected by email to jack.robirosa@greenpeace.org and exuk@greenpeace.org.

Costs

6. There be no order as to the costs of and occasioned by this order and the undertaking recorded herein.

Statement of Acknowledgment by the Second Defendant's representative

The Second Defendant understands that the undertaking above has the same force and effect as an order of the court. The Second Defendant understands that if it breaches this undertaking it may be held in contempt of court and may be imprisoned, fined and / or have its assets seized. The Second Defendant confirms that it has been advised that it should seek legal advice. The Second Defendant confirms that it understands the meaning and effect of the undertaking.

Signed: Jack Robirosa

Name: Jack Robirosa

For and on behalf of the Second Defendant

Date: 24 October 2025

OR

Signed: _____

[Solicitors' name], Solicitors for the Second Defendant

[Address, reference, email, telephone]

Date:

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

Before: The Honourable Mr Justice Trower

Dated: 24 October 2025

BETWEEN:

RWE GENERATION UK PLC

(Company registration number 3892782)

Claimant

and

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION
ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM
FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR
ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN
SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.**

(2) GREENPEACE UK LIMITED

(Company registration number 02463348)

(3) GREENPEACE LIMITED

(Company registration number 01314381)

Defendants

ORDER

The Court accepts the undertakings given by the Second Defendant in the Order hereby approved and attached, but any director of the Second Defendant desiring to contend that the person signing the undertaking on its behalf was not authorised to do so may apply for that purpose by not later than 4pm on 29 October 2025.

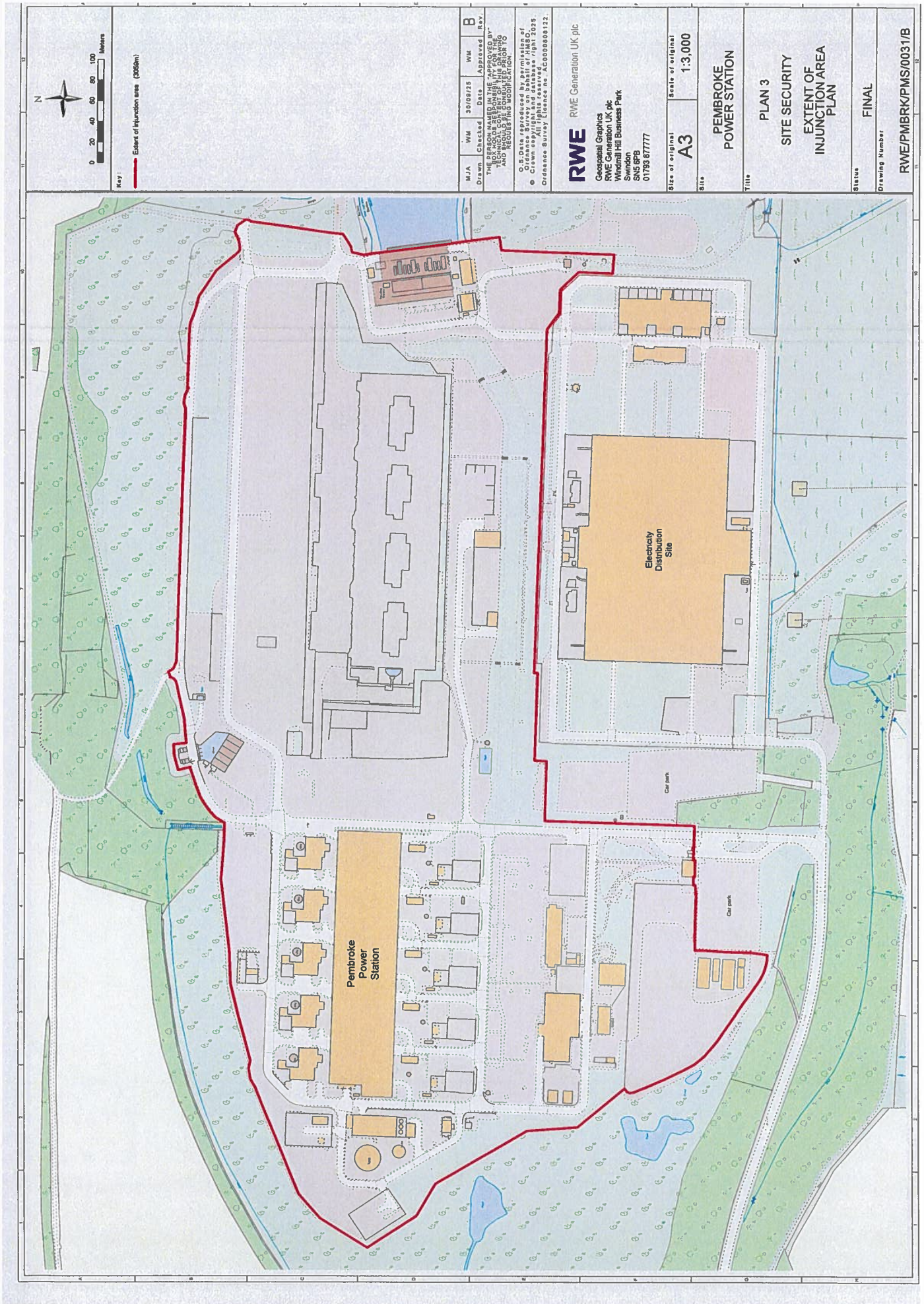
Judge's Endorsement

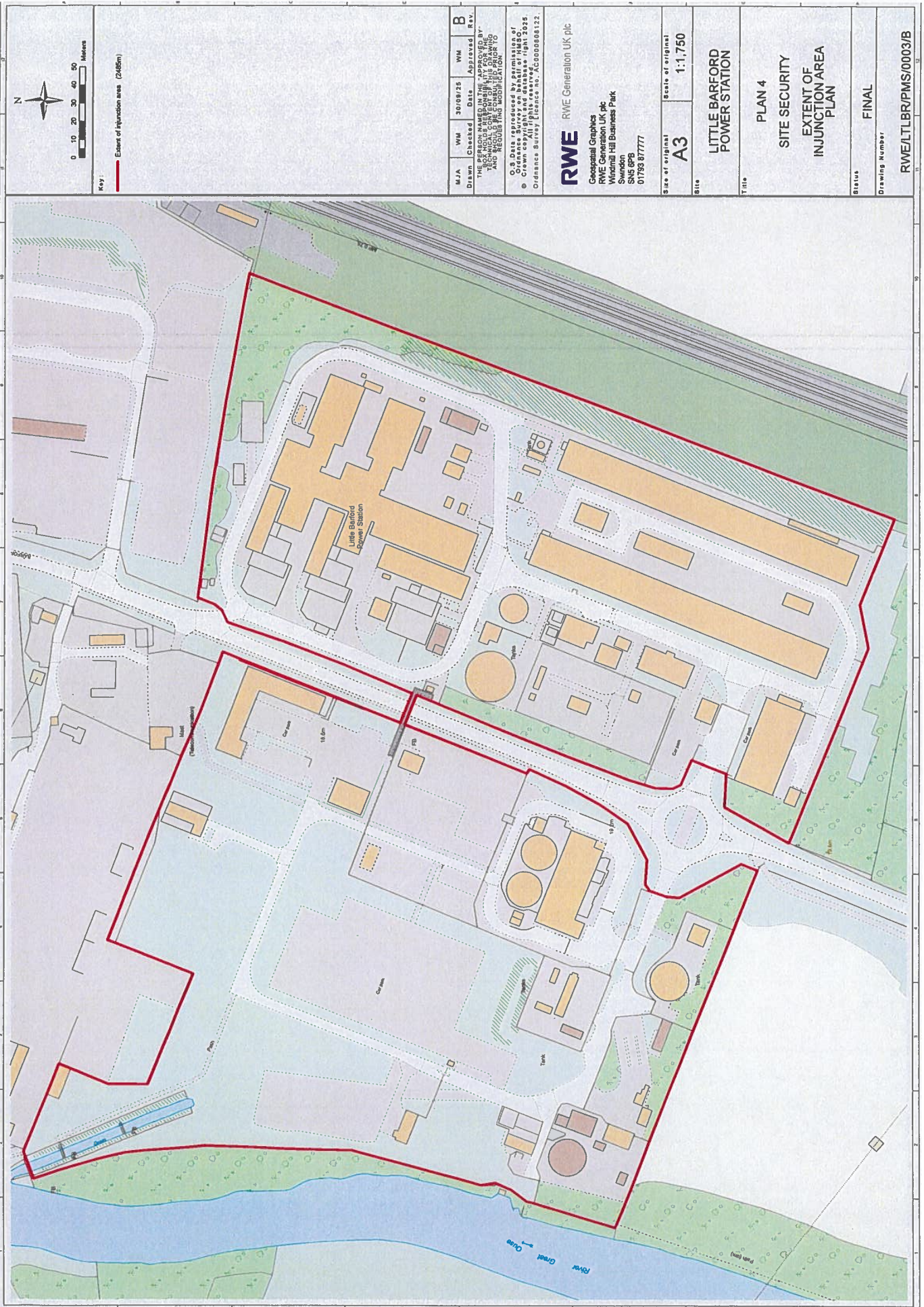
The Court notes and accepts the undertakings given by the Second Defendant recorded above.

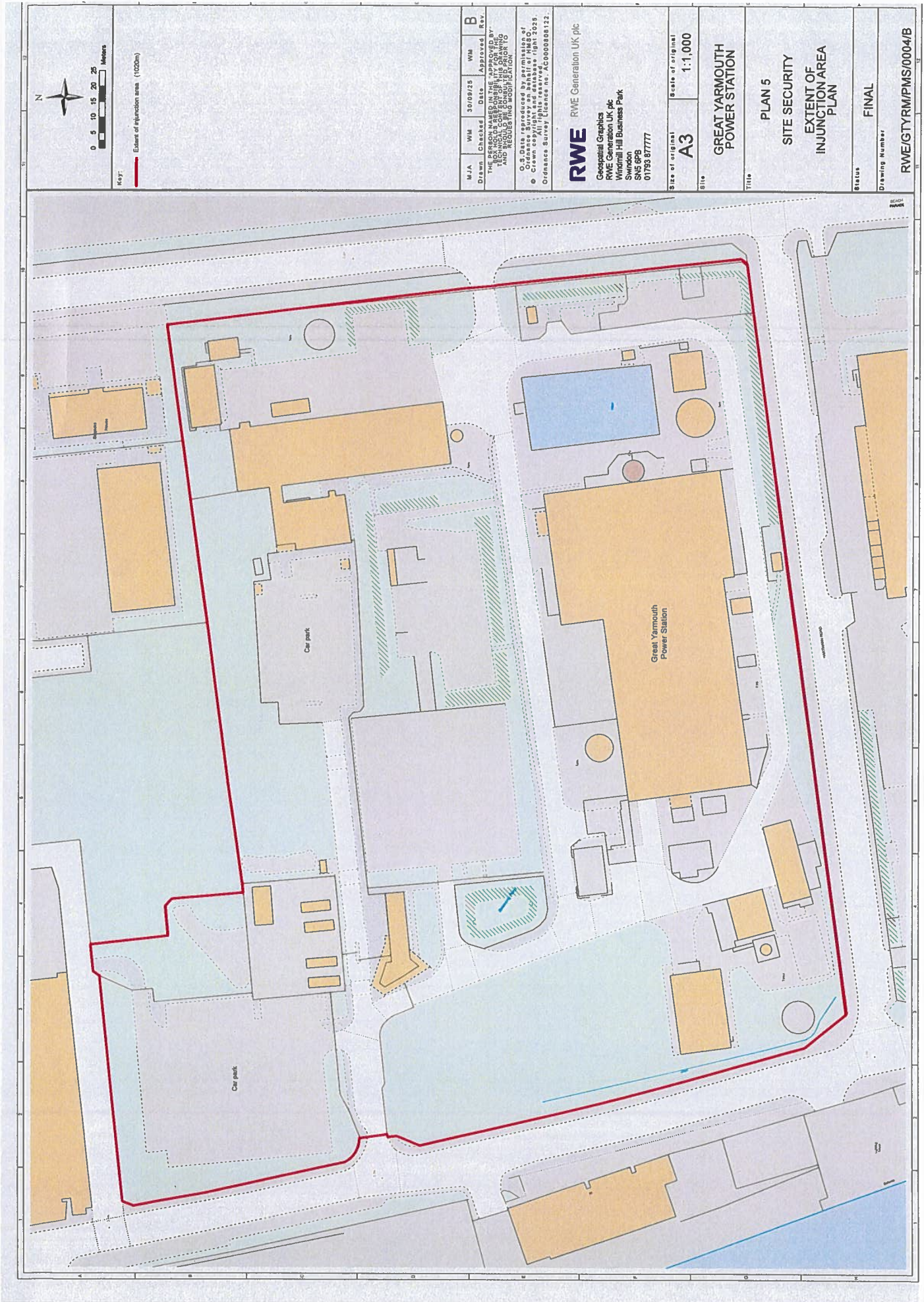
Dated: 24 Oct 2025

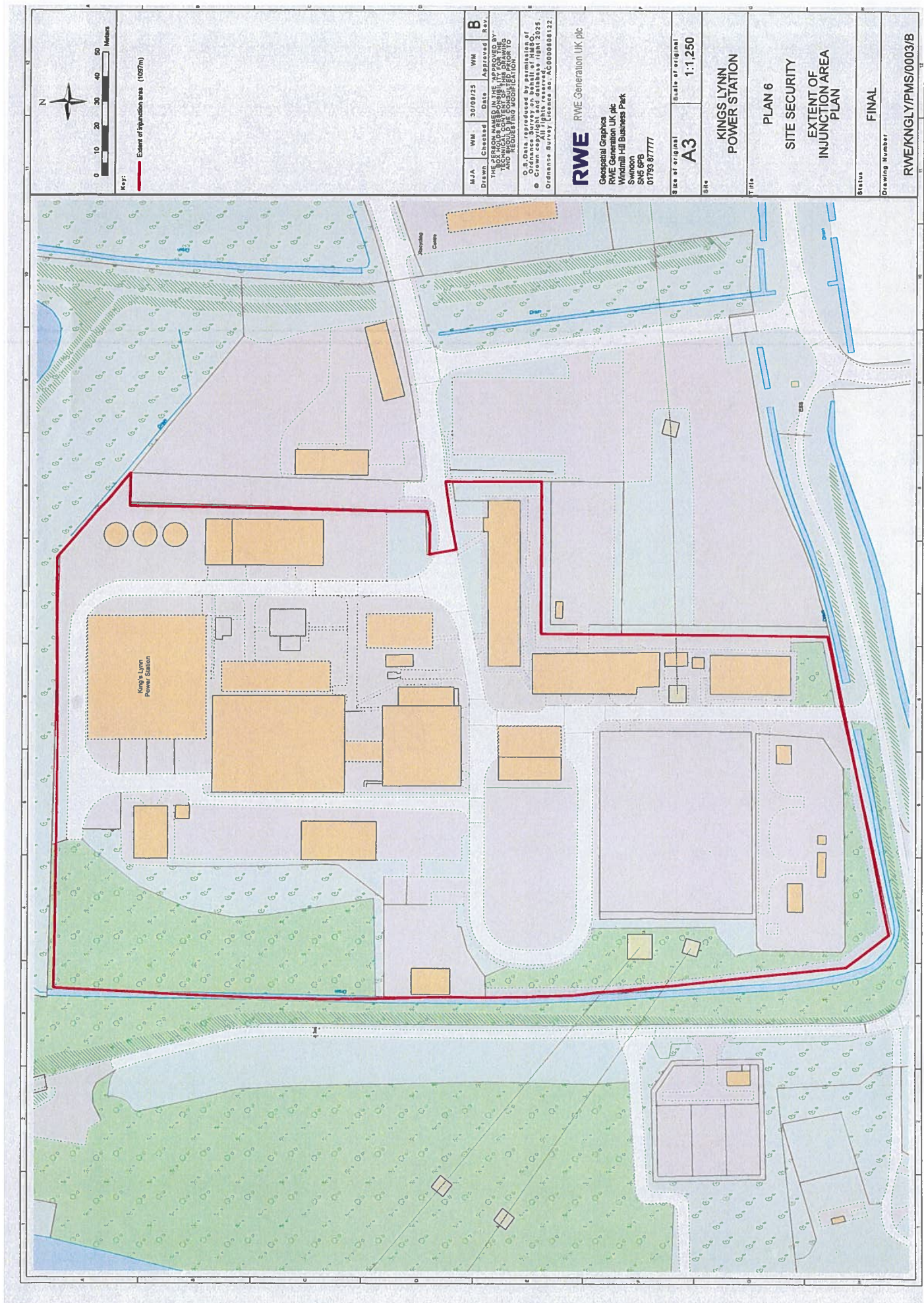
Judge: Helen Goss

SCHEDULE 1: PLANS 1-6









IN THE HIGH COURT OF JUSTICE

Claim No. PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST & PROBATE LIST

BETWEEN:

RWE Generation UK Plc

(Company registration number 3892782)

Claimant

- and -

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN
UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR
DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF
PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE**

(2) Greenpeace UK Limited

(Company registration number 02463348)

(3) Greenpeace Limited

(Company registration number 01314381)

Defendants

NOTE OF "RETURN" HEARING

BEFORE MR JUSTICE TROWER

LISTED FOR 24 OCTOBER 2025 AT 10:30

The hearing commenced at 10.41 Appearing for the Claimant **Timothy Morshead KC ("TM")** and **Jacqueline Lean ("JL")** before Honourable **Mr Justice Trower ("J")**.

Preliminary Matters

1. The Court confirmed receipt of the updated hearing bundle, the authorities bundle, a supplementary authorities bundle and a copy of the application notice (to add Greenpeace

Limited as a third Defendant, for the purposes of Greenpeace Limited giving an undertaking to the Court) and its enclosures, including a draft order.

Undertakings given by Greenpeace UK Limited & Greenpeace Limited

2. TMKC explained that Greenpeace UK Limited and Greenpeace Limited – the Greenpeace ("GP") entities – had, since the without notice hearing on 3 October 2025 before Mr Justice Rajah, given undertakings in an attempt to resolve this matter insofar as GP were concerned. TMKC noted that the giving of these undertakings was, in and of itself, an implicit indication that GP had accepted there was a credible threat of repeat trespass occurring across RWE's power-station sites; enough of a threat to warrant the giving of these undertakings to the Court so as to avoid an injunction being granted against them.
3. J recognised and acknowledged the undertakings, but expressed discomfort that the undertakings were signed by in-house lawyer Jack Robirosa. He indicated a willingness to accept the undertakings, subject to a director of Greenpeace (or a person with requisite authority) writing to RWE within approximately 72 hours confirming his authority, or some other similar method of confirmation.

Submissions on the Law

4. J requested that two key points be clarified through submissions: (1) application of the "compelling need" threshold set out in *Wolverhampton CC v London Gypsies & Travellers [2024] AC 983*, and (2) analysis as to the proportionality questions raised and discussed in arguments by Greenpeace and RWE, by the grant (or continuation) of the injunction.
5. TMKC sought first to contextualise the decision in *Wolverhampton CC v London Gypsies & Travellers [2024] AC 983* regarding newcomer injunctions. TMKC noted that, from a legal taxonomy perspective, two key contributions emerged from *Wolverhampton*:
 - 5.1 First – conceptually, Persons Unknown are bound by an order of the Court not because they become defendants to the litigation, but because they are bound by notice of the order; and
 - 5.2 Second – this injunctive relief largely assumes the Claimant will succeed at trial, and so has demonstrated strong evidence of a cause of action, etc. However, it is also assumed that anyone who dislikes the order may argue against it having been made.
6. TMKC then noted that there were relevant considerations specific to Traveller cases that might not apply in other cases. One, typically, was that these injunctions were sought by local authorities in the difficult position of having a statutory duty to provide a space for Gypsies and Travellers, while also seeking to prevent Travellers camping on open land when they had arguably failed to exercise that statutory duty.
7. TMKC submitted *Wolverhampton CC v London Gypsies & Travellers [2024] AC 983* as the main authority regarding factors influencing when a newcomer injunction might be granted in the "novel exercise of judicial discretion" (p.167 of the judgment): (i) a compelling need for the protection of civil rights, (ii) procedural protection for the rights of newcomers, (iii) compliance with a strong duty of disclosure on the applicants, (iv) territorial and temporal limitations on the terms of the injunction, and (v) that it be just and convenient to grant such an injunction on the facts.
8. TMKC and J agreed the "controlling" factor was that of compelling need. TMKC submitted the UK Supreme Court's ("**UKSC**") approach to compelling need was couched in the absence of adequate alternative remedies, and argued that assessing the question of "compelling need" was a valiative exercise based on the availability of other remedies. TMKC relied on the ambiguity of the decision in *Cambridge University v Persons Unknown [2025] EWHC 454 (KB)* to emphasise the point. TMKC submitted that, in conducting that valiative exercise, injunctive

relief was appropriate in this case. As to why injunctive relief was appropriate, TMKC submitted that Mrs Justice Farbey's reasoning and his own submissions in *Exolum Pipeline System Limited & Ors v Persons Unknown* [2024] EWHC 1015; [2025] EWHC 1913 (KB) were to be preferred – namely, that there might be a compelling need for the Court to grant injunctive relief in relation to a small risk of future disruption if the consequences of that risk materialising were serious.

The Impact of Trespass & Future Risk of Reoccurrence

9. TMKC provided some detail about the Sites themselves and – by reference to the Witness Statement of William Henry Jeffery – submitted that even small interference with any of the Claimant's six power stations (in respect of which injunctive relief was being sought) might, in addition to costing the Claimant millions of pounds in damage, also result in large-scale disruption to the National Grid, disruption to the UK's national electricity system, and great harm to the protesters themselves and surrounding end users of the electricity supplied.
10. J considered the photos accompanying William Henry Jeffery's witness statement, as evidence of potential risk of harm to the protesters themselves and as evidence of the extent of the trespass that occurred on the Claimant's Staythorpe power station site on 22 September.
11. TMKC moved on to argue that there was sufficient risk of trespass activity recurring on these Sites so as to justify a compelling need for an injunction, by reference to the sentiments in William Henry Jeffery's witness statement that environmental direct action and protest activity had been on the rise, including increased targeting of critical national infrastructure particularly since 2022 and since the Just Stop Oil wave of campaigns. The prior trespass at Staythorpe power station and the surrounding publicity were, it was argued, sufficient inspiration for such protest groups to possibly strike the Claimant's power stations again.
12. TMKC relied on evidence from GP's website and advertising materials, to further demonstrate an increased risk in protest activity notwithstanding the undertakings already provided, whether by persons from GP or by persons so inspired.

ECHR & Proportionality

13. J considered the ECHR and proportionality arguments raised by Greenpeace's in-house counsel, by letter to the Court dated 23 October 2025, in which it was argued that the grant of a newcomer injunction needed to be balanced against those Persons Unknown's Article 10 (freedom of expression), Article 11 (freedom of assembly and association with others) and Article 14 (enjoyment of Convention rights and freedoms shall be secured without discrimination on any ground such as (inter alia) race, religion and political or other opinion) rights.
14. TMKC pointed again to *Wolverhampton CC v London Gypsies & Travellers* [2024] AC 983 at paragraph 183, in which the UKSC noted the following (**emphasis added**):
 - 14.1 *"The appellants' final main point was that it would always be impossible when considering the grant of an injunction against newcomers to conduct an individualised proportionality analysis, because each potential target Traveller would have their own particular circumstances relevant to a balancing of their article 8 rights against the applicant's claim for an injunction. If no injunction could ever be granted in the absence of an individualised proportionality analysis of the circumstances of every potential target, then it may well be that no newcomer injunction could ever be granted against Travellers. But we reject that premise. To the extent that a particular Traveller who became the subject of a newcomer injunction wished to raise particular circumstances applicable to them and relevant to the proportionality analysis, this would better be done under the liberty to apply if, contrary to the general disinclination or inability of Travellers to go to court, they had the determination to do so."*

15. TMKC argued that the above, together with the development of the ECHR as rights that had to be asserted, demonstrated that it was inevitable in a case in this jurisdiction that balancing the supposed and hypothetical rights of people wanting to protest against the undoubted rights of people owning land and not wanting to have their property trespassed upon was supremely unlikely to come down in favour of the protesters.
16. J agreed with TMKC's analysis.

Conclusion

17. TMKC and J considered that the main questions on substance had been addressed, including the points as to the ECHR Convention analysis.
18. J confirmed that the injunctive relief was to be granted in principle, and that his oral judgment would explain both the principles and the reasoning on which he was convinced.

Summary of Oral Judgment

Contextual Background:

19. J recounted in brief the procedural history of the matter – without notice relief had been granted by Rajah J on 3 October 2025 against Persons Unknown and Greenpeace UK Limited, and continuation against Greenpeace UK Limited was not sought at the return hearing. Details surrounding the undertakings given by GP were recounted.
20. J recounted GP's 23 October 2025 letter explaining GP's stance, and recording that GP said that RWE had sued the wrong entity. J noted that he would agree to join Greenpeace Limited ("GL") as third Defendant, to give an undertaking on the same terms as Greenpeace UK Limited.
21. J identified the land: six RWE gas-fired stations (Staythorpe, Didcot, Pembroke, Little Barford, Great Yarmouth, King's Lynn). J noted that RWE owned ten in total but did not seek relief for four smaller stations and thereby had been responsible in its assessment of what it sought from the Court.
22. J noted third-party leasehold interests (National Grid, SSE Services, Eastern Power Networks) and accepted RWE had sufficient possession/control to sue, including over parts of King's Lynn reachable only by trespass over RWE land.
23. J summarised the 22 September Staythorpe protest: eight GP-associated protesters likely scaled the perimeter and then two 75 m stacks, displaying "Great Gas Rip-Off" banners.

Reasoning for Granting Injunctive Relief:

24. J acknowledged RWE's evidence of increased direct action targeting energy infrastructure in recent years. J rehearsed the potential consequences raised, including that trespass could force shutdowns, cause millions in losses, and disrupt the national electricity system and grid. J noted serious safety risks to protesters (heat, hazardous chemicals, falls) and risks to site and emergency personnel.
25. J recounted TMKC's submissions as to the relevant authorities. J confirmed the civil causes of action were made out across the Sites, including those with third-party leases, subject to ECHR considerations.
26. J addressed ECHR concerns, relying on Butcher J's analysis in *Cambridge University v Persons Unknown*. He accepted Articles 10/11 (and 14) were engaged even on private land, but found

the balance was most unlikely to favour protesters where alternative protest venues existed that did not cause such possible danger.

27. J recounted GP's argument against the likelihood of future protest, by reference to GP's letter to the Court dated 23 October 2025, citing:
 - 27.1 how the campaign was designed to target government/energy markets, not RWE; and
 - 27.2 how GP had offered undertakings to put the matter beyond doubt;
28. J found that he was more convinced by TMKC's rebuttal arguments, owing to GP website materials encouraging secrecy and acceptance of criminal risk, and submitted the publicity was likely to spur unaffiliated copycat actions by persons over whom GP had no control.
29. J noted that he had placed considerable weight on the inherent danger of power-station trespass and potential grid/consumer impacts.
30. J concluded there was a compelling need (the "controlling factor" as required by *Wolverhampton*) and in principle extended/continued the injunction granted by Rajah J, with order details to be finalised with TMKC.
31. A detailed note of the judgment is set out in Schedule 1.

Procedural Discussion – The Logistics of the Draft Order

32. J made the following points as regards the draft order submitted to the Court in advance of the hearing:
 - 32.1 The submission was for the injunction to be reviewed annually, at a hearing listed for 2.5 hours. J flagged that such a request would not come back to interim applications in the Court sitting for this hearing; a fixture would need to be obtained.
 - 32.2 J requested that C be required to make an application not less than three months before the date on which the injunction would otherwise lapse.
33. J permitted service on the second and third Defendants by email, and dispensed with service on the first Defendant (Persons Unknown); rather, the first Defendant was to be notified by affixing a copy of the order at prominent locations at each of the Sites, together with warning notices, and uploading the application to the RWE website.

The hearing ended at 12:30.

Schedule 1

Oral Judgment handed down by Mr Justice Trower

This is return date for an application for injunctive relief in relation to the case of:

RWE Generation UK Plc

(Company registration number 3892782)

Claimant

- and -

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN
UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR
DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF
PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE**

(2) Greenpeace UK Limited

(Company registration number 02463348)

(3) Greenpeace Limited

(Company registration number: 01314381)

Defendants

Without notice relief was granted by Lord Justice Rajah on the 3rd October. In addition to persons unknown, Greenpeace UK Limited was named as a 2nd defendant to the proceedings. Lord Justice Rajah also granted relief against Greenpeace UK Limited, in light of the undertakings it was prepared to give. A continuation of the injunction against Greenpeace UK Limited is not sought today.

But, Greenpeace has written to the court, as of 23 October 2025, to explain its position as to why it has adopted the position it has. It also explains why it considers that RWE Generation UK Plc ("**RWE**") has not established an entitlement to an injunction against persons unknown – on which I will come back to shortly.

Greenpeace UK Limited has also contended that RWE chose the wrong entity to sue. However, the right entity – Greenpeace Limited – is prepared to give an undertaking on the same terms as Greenpeace UK Limited, for the purposes of which I will join Greenpeace Limited as a 3rd party Defendant to the proceedings.

The Land comprises 6 of the 10 gas-fuelled power stations operated by RWE in the UK – namely:

1. Staythorpe Power Station (Staythorpe, Newark, NG23 5RQ)
2. Didcot Power Station (Didcot, Oxfordshire, OX11 7YU)
3. Pembroke Power Station (Pembroke, West Pennar, Dyfed, SA71 5SS)
4. Little Barford Power Station (Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT)

5. Great Yarmouth Power Station (South Denes Road, Great Yarmouth, NR30 3PY)
6. Kings Lynn Power Station (Power Station) (Kings Lynn, PE34 3RD)

RWE is the freehold owner of each premises. The remaining 4 power stations within RWE's jurisdiction are smaller.

National Grid Electricity Transmission Plc is registered leasehold proprietor of land at Staythorpe Power Station, Didcot Power Station and Kings Lynn Power Station. SSE Services Plc is registered leasehold proprietor of electricity sub-stations at Didcot Power Station. Eastern Power Networks is registered leasehold proprietor of land at Great Yarmouth Power Station and Kings Lynn Power Station. Parts of Kings Lynn Power Station are not in RWE freehold ownership, but the Claimant asserts it is a person entitled to sufficient possession or control of this area to entitle it to pursue a claim in trespass against the Defendants.

RWE proposes the injunction sought to be maintained is reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 and a half hours, and that the injunction shall lapse at 4pm on the anniversary of the Order (or, as the case may be, the latest annual review) unless, before then, the Claimant has applied for the review to take place.

The details of the Draft Order I will consider with TM, who appeared for the Claimant, after I've finished my reasoning.

Greenpeace issued a protest campaign against RWE focusing on allegations it charges inflated prices on the National Grid. As part of that campaign, on the 22nd September eight protestors associated with Greenpeace UK entered the Claimant's facility at Staythorpe Power Station, probably by scaling the perimeter fence, and scaled two of the 75m high gas turbine "stacks" (and there displayed banners highlighting the Greenpeace UK campaign against the "Great Gas Rip-Off".

Significant publicity in local and national press occurred as a result of this action. The protestors themselves were charged with offences.

This happened despite Greenpeace UK having met with representatives from the Claimant on 16 September 2025 – at a meeting requested by Greenpeace UK to discuss its concerns – and a subsequent meeting having been arranged for 24 September 2025. Prior to the grant of the without notice injunction, Greenpeace has not ruled out taking any similar action in future, even if engagement through dialogue were to continue.

Greenpeace has changed its position since Mr Justice Rajah's decision. As to dialogues, discussions were ongoing with GP at the time of the protest on the 22nd September, but did not continue up to the time of hearing with Mr Justice Rajah. Evidence put forward by RWE also sets out in some detail the nature of historic protest and work of other protest groups relating to power stations, submitting there has been an increase in recent years of climate change and environmental activist groups targeting energy infrastructure across the UK, which has led to a number of instances of injunctions being given to deter protest activity. Examples submitted to me are all over 2 years ago, but RWE say they appear to have continuing effect.

Acts of trespass on these large sites is said to be very significant if it cause RWE to cease operations – it would cause millions of loss to RWE and disrupt the national electricity system, forcing RWE to stop output to ensure safety of protestors. That would be extremely serious.

Evidence is if that were to happen, this may mean a knock on disruption to the National Grid and widespread short term power failure. There are large and continuing consequences in relation to unauthorised access. I should add there would be some impact on RWE if trespass were to occur on the 4 smaller power stations – however, RWE doesn't seek injunctive relief on those for reasons of

proportionality. I accept this shows how responsible in practice RWE have been in assessing the extent of damage from the public and its own perspective in the event of trespass action across its stations.

Potential of harm – RWE points out there are serious risks to protestors exposing themselves to very serious harm in the course of a trespass, including contact with high gas temperature exposure to hazardous chemicals and falls from stack towers – which would be even more serious if protestors climbed to the top of stacks to impede regeneration.

RWE have taken extensive security measures to stop trespass. Perimeter fence lines and crucial assets are monitored by CCTV. The Claimant has enhanced security measures across all stations, including strengthening liaison with local police forces.

Nonetheless it is concerned that in the absence of injunctive relief similar events in future at Staythorpe and the other sites will occur. As indicated, GP agreed to give an undertaking. The focus of this hearing has therefore been if relief should continue against persons unknown. The principles stem from *Wolverhampton CC v London Gypsy and Traveller* [2024] AC 983 – the leading authority in injunctions against newcomers.

As was explained at paragraph 143 – these types of proceedings generally form a form of enforcement in cases where the persons restrained are unlikely to have any right or liberty to do that prohibited by the Order, rather than dispute resolution – this is relevant to the precise test the court should apply in deciding to grant the relief sought today.

Wolverhampton was concerned with newcomer injunctions in gypsy and traveller cases – much of what the UKSC said is specific to that case, but paragraphs 235 and 236 of the judgment sees the UKSC address the position regarding protest cases – such as protestors who engage in direct action by, for example, blocking motorways, occupying motorway gantries or occupying HS2's land with the intention of disrupting construction, etc. In each instance, what is required is full and careful assessment of the justification sought, rights interfered with, and proportionality of the interference. As with all newcomer cases, the Court has to be satisfied that there is compelling need for the order sought – although I accept what TM submits for present purposes – that when considering the question of compelling need, one of the critical questions for the court is whether or not there is an effective alternative to the injunction sought

This is a developing jurisdiction – TM also drew my attention to number of other decisions, inc. Justice Ritchie in *Valero Energy* [2025] EWHC 207 (KB), which sets out at p58 factors court should have regard to in ordering relief against persons unknown

Nonetheless, for my part I found the analysis of *Wolverhampton* at paragraph 167 of the judgment of particular assistance – TM also referred in his skeleton argument to the decision of *Jockey Club Racecourses Ltd v Persons Unknown & Ors* [2024] EWHC 1786 Chancery – in that case, there was threat by protest movement to impact running of the Derby – the approach in *Wolverhampton* was adopted.

It goes without saying there must be civil cause of action in the claim form and PoC – here, the case of previous trespass and the 'quia timet' fear of protest going forward. This aspect is satisfied in all areas where the sites are not leased to 3rd parties and there is no defence to the underlying claim.

As to the parts let to 3rd parties – RWE does not have a right of occupation, but I understand these parts cannot be reached without trespass over rights of occupation on land it does hold.. Subject only to further consideration of ECHR rights, I agree.

As to the ECHR, I found the analysis from Justice Butcher in *Cambridge university v Persons Unknown* informative. Mr Justice Butcher carried out a necessary balancing exercise, balancing the freedom of exercise by the Defendants of their Article 10 (Freedom of Expression), Article 11 (Freedom of Assembly & Association with others) and Article 14 (Enjoyment of Convention rights and freedoms shall be secured without discrimination on any ground such as (inter alia) race, religion and political or other opinion).

I can see each of those rights in theory engaged in the present case, and also accept Article 10 and 11 are engaged even in the context of trespass. As TM submitted over the course of his submissions, against the hypothetical rights of persons unknown must be balanced RWE's rights to peaceful enjoyment of its possessions under Article 1, and the common law rights as regards trespass and nuisance.

In my judgment, this balance is most unlikely to come down favour of protestors when there are plenty of other places they could protest. Against that background, the overarching conclusion is there is a compelling justification for the order sought in the way described in the authorities. GP say in its letter to the Court dated 23 October 2025 that notwithstanding the events of 22nd September at Staythorpe, RWE have not established a compelling justification. They say the GP campaign isn't directed at RWE per say, it's much more general than an attack on RWE itself. It calls for the government to get rid of gas power stations and to place them in strategic reserve. They say there is no proper basis to say persons unknown would be particularly compelled by this campaign to target RWE's sites. Making this point, Ms Areeba Hamid - the executive director of Greenpeace - is quoted in Greenpeace's letter, and commented to RWE on the events at Staythorpe as follows:

"The objective of that protest was to highlight that gas is what is keeping our bills high and letting it stop from setting our energy prices will bring down bills [...] We made a deliberate choice not [to] name or single out RWE because our campaign is not about one company but about the energy markets and resetting them and ultimately our demand is towards the government to do the right thing."

GP say in terms it has no intention of further protest across the sites and the reason Greenpeace is prepared to offer undertakings across the 6 sites is to put the matter beyond doubt.

Greenpeace then went on to criticise 3 aspects of the evidence before Lord Justice Rajah:

1. History of trespass on RWE premises – it was pointed out that none of them involved Greenpeace UK and none resulted in consumers left without power. Only one that did involve was Germany 2019 – protest to interrupt an RWE board meeting
2. Since early 2022, the points regarding increases in protest activity by direct action targeting petroleum and gas infrastructure – Greenpeace pointed out Just Stop Oil announcing it had ceased all activities.
3. Greenpeace pointed out it was wrong for RWE to assert Greenpeace was duplicitous, making the following point:

"As explained in the email of Areeba Hamid dated 24 September 2024, as a campaign organisation Greenpeace regularly blends external pressure with private communication. Peaceful protest can be uncomfortable for companies but that does not make it duplicitous, nor does the lack of prior warning. Mr Glover of RWE said in response "I understand completely how Greenpeace approaches his strategies [...] we are fundamentally aligned with many of your objectives [...] many thanks for keeping the dialogue open"

Against this RWE makes several points;

1. TM did not resile from contending Greenpeace is still duplicitous. I agree – notwithstanding 22dn September.
2. Second, aims and statements on Greenpeace's website includes materials thought to incite commission of criminal offences and at least warn activists of the risk of criminal convictions, if they so participate.

3. The publicity generated by the Staythorpe incident and Greenpeace's new campaign will encourage other persons not affiliated with GP to target other power stations in a similarly unlawful way. TM submitted people with strong passions are an important aspect of the background risk when assessing the extent to which persons unknown may take their lead from protests that have already been heard.

It seems to me these are all powerful considerations and there is material risk of further conduct of this sort, in some way 'copycat protests', and a risk they will occur. I'm satisfied there is an enhanced risk of increased activity on RWE sites, because of what already occurred on September 22nd.

Also, I have in mind 2 other material factors:

1. On the evidence there is sometime no more than a loose connection between individuals who may or may not hold themselves out as GP but are not de facto affiliated, who utilise Greenpeace as a spring board for their own unlawful activity even where not instructed or authorised by Greenpeace itself.
2. I have placed considerable weight on the consideration that trespass on power stations is inherently dangerous – if it affects operations, it does damage not just to RWE but also to the operation of the national grid and the interests of the end users for whom electricity is supplied.

Taking all those considerations into account, I am satisfied there is a compelling need for the injunction sought by RWE established in this case and I will in principle extend the award made by Lord Justice Rajah.

Application notice

Take notice that an appointment to fix a date for the Application has been made for 11:00AM on 30th July 2026. Please note this is a deadline to file your dates to avoid. Please send through your dates to avoid via email to chanceryjudgeslisting@justice.gov.uk by 11:00AM on 30th July 2026. If you wish to attend in person to discuss and list this matter, please email the listing officers at chanceryjudgeslisting@justice.gov.uk confirming when yourself and the other party representatives intend to attend the list office. If attendance is confirmed please attend at: COUNTER 9, GROUND FLOOR, THE ROLLS BUILDING, 7 ROLLS BUILDINGS, LONDON, EC4A 1NL. Please provide dates to avoid/of availability within the specified hearing window <https://www.gov.uk/guidance/trial-date-windows-for-chancery-division>. Failing availability being given a date will not be supplied and parties will be required to contact the office for a further appointment. NB: This is not a Judicial hearing and is only to arrange a hearing date.

Name of court High Court of Justice (ChD)	Claim no. PT-2025-001017
Fee account no. (if applicable) PBA0080949	Help with Fees – Ref. no. (if applicable) 17 Jul 2026
Warrant no. (if applicable)	H W F - - - -
Claimant's name (including ref.) RWE GENERATION UK PLC (Ref: DKA/10002880)	
Defendant's name (including ref.) See Schedule 1	
Date	17 July 2026

1. What is your name or, if you are a legal representative, the name of your firm?

Osborne Clarke LLP

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent?

Claimant

3. What order are you asking the court to make and why?

Pursuant to paragraph 3 of the order of the Honourable Mr Justice Trower dated 24/10/25 (the "Order"), the Claimant applies for a review hearing of the injunction set out at paragraphs 1 and 2 of the Order, to be listed on or before 24/10/26. The Claimant's evidence in support of this application will follow in due course, in accordance with paragraph 3 of the Order. A draft order will also follow in due course.

4. Have you attached a draft of the order you are applying for? ☐ Yes ☒ No

5. How do you want to have this application dealt with? ☒ at a hearing ☐ without a hearing
☐ at a remote hearing

6. How long do you think the hearing will last? Hours Minutes

Is this time estimate agreed by all parties?

☒ Yes ☐ No

7. Give details of any fixed trial date or period

Review hearing on or before 24/10/2026

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

Notification on the First Defendant and service on the Second and Third Defendants (see 9a below).

- 9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

The Claimant shall notify the First Defendant of the Application Notice in accordance with paragraph 6 of the Order and shall serve the Application Notice on the Second and Third Defendants in accordance with paragraphs 10 and 11 of the Order.

10. What information will 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

If necessary, please continue on a separate sheet.

Witness evidence shall follow in due course and at least 14 days before the review hearing, in accordance with paragraph 3 of the Order.

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



- ☐ 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
17	07	2026

Full name

Donal Patrick Kelly

Name of applicant's legal representative's firm

Osborne Clarke LLP

If signing on behalf of firm or company give position or office held

Legal Director

Applicant's address to which documents should be sent.

Building and street

One London Wall

Second line of address

Town or city

London

County (optional)

Postcode

E	C	2	Y	5	E	B
---	---	---	---	---	---	---

If applicable

Phone number

0207 105 7330

Fax phone number

DX number

Your Ref.

DKA/10002880

Email

donal.kelly@osborneclarke.com; carl.roche@osborneclarke.com;
sophie.abbott@osborneclarke.com

Schedule 1

Defendants' names:

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED (Company registration number 02463348)

(3) GREENPEACE LIMITED (Company registration number 01314381)



HM Courts & Tribunals Service

HM Courts & Tribunal Service
Business and Property Courts of
England and Wales
Rolls Building
7 Rolls Buildings
London
EC4A 1NL
DX 160040 Strand 4
T 020 7947 6690
Email :
chanceryjudgeslisting@justice.gov.uk
www.justice.gov.uk

Copy of notice emailed to the following
injunctions@osborneclarke.com
Donal.Kelly@osborneclarke.com
carl.roche@osborneclarke.com
exuk@greenpeace.org
jack.robirosa@greenpeace.org
sophie.abbott@osborneclarke.com

Date 31 July 2026

Case reference: PT-2025-001017
Case Title: RWE Generation UK PLC v Persons Unknown and others

Notice of Application Hearing Date

The Claimants application notice dated 17 July 2026 has been listed in a 3 day window from the 19 October 2026 with a time estimate of half a day.

Information regarding the listing of this case can be found on the Justice website
<https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111> at approximately 2pm on the previous working day.

Yours Faithfully
Mark Quigley,
Chancery Listing Office



INVESTOR IN PEOPLE

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY DIVISION
PROPERTY, TRUST AND PROBATE LIST

Claim No: PT-2025-001017

BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)

Claimant

and

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION
ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM
FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR
ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN
SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.**

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

[DRAFT] ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT 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 A DEFENDANT TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it 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.

BEFORE _____ on _____ October 2026

UPON the Claimants having issued this Claim by a Claim Form dated 1 October 2025

AND UPON injunctive relief against the First Defendant having been granted by the Honourable Mr Justice Trower on 24 October 2025 ("the Injunction Order") (enclosed at Schedule 1)

AND UPON the Claimant having applied for a review of the Injunction Order by application notice dated 17 July 2026

AND UPON the first annual review of the injunctive relief having taken place on [] October 2026

AND UPON READING the Witness Statements of Rachel Jane Smith dated 1 October 2025, William Henry Jeffery dated 1 October 2025 and 1 October 2026, and Donal Patrick Kelly dated 20 October 2025 and 1 October 2026

AND UPON HEARING [] for the Claimant [and _____ for _____ the Defendants] [there being no other attendance]

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the injunctive relief granted by the Injunction Order

IT IS ORDERED THAT:

1. The Injunction Order shall remain in full force and effect, subject to the amendments thereto set out in Schedule 2 to this Order and subject to review as provided for at paragraph 3 of the Injunction Order.
2. The Court will provide sealed copies of this Order to the Claimant's solicitors for service and notification by the steps set out in paragraphs 5(i)-(ii), 10, 11 and 13 of the Injunction Order.

Dated: 2026

SCHEDULE 1 – THE INJUNCTION ORDER

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE GENERATION UK PLC

(Company registration number 3892782)



Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED

(Company registration number 02463348)

(3) GREENPEACE LIMITED

(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

**IF YOU THE WITHIN DEFENDANTS OR 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.**

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it 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.

BEFORE the Honourable Mr Justice Trower on 24 October 2025

UPON the Claimants having issued this Claim by a Claim Form dated 1 October 2025

AND UPON the Claimant's application for an ex parte interim injunction by Application Notice dated 1 October 2025

AND UPON interim injunctive relief having been granted at an ex parte hearing by the Honourable Mr Justice Rajah on 3 October 2025

AND UPON the Claimants seeking continuation of the interim injunctive relief granted on 3 October 2025

AND UPON the Second Defendant and Greenpeace Limited (which is joined to these proceedings as Third Defendant for the purpose of giving the undertaking hereinafter referred to) having agreed terms including undertakings provided by those Defendants to the Court on 24 October 2025 annexed to this Order at Schedule 4 ("the Undertakings")

AND UPON the Court having accepted the Undertakings

AND UPON READING the Witness Statements of Rachel Jane Smith dated 1 October 2025, William Henry Jeffery dated 1 October 2025, and Donal Patrick Kelly dated 20 October 2025

AND UPON HEARING Timothy Morshead KC and Jacqueline Lean for the Claimant

AND UPON the Claimant giving and the Court accepting the undertakings set out in Schedule 1 to this Order

IT IS ORDERED THAT:

INJUNCTION

1. The First Defendants must not enter, occupy or remain on, or damage or deface any part (including the perimeter fence), of the land and premises shown edged red on Plans 1 to 6 to this Order, being:
 - (i) Staythorpe Power Station, Staythorpe, Newark, NG23 5RQ, as shown edged red on Plan 1;
 - (ii) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - (iii) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - (iv) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - (v) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5.
 - (vi) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6.
2. In respect of anything prohibited by paragraph 1 above, the First Defendants must not (a) do it himself/herself/themselves in any other way or (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

REVIEW

3. The injunction set out at paragraphs 1 and 2 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant shall file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days

before the hearing. The injunction set out at paragraphs 1 and 2 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place, such application to be made not less than 3 months before the date on which the injunction would otherwise lapse. Provided such application is made not less than 3 months before the anniversary of the order (or as the case may be the latest annual review) the Court shall list the review hearing on or before the date on which the injunction set out at paragraphs 1 and 2 of this Order would otherwise lapse.

SERVICE AND NOTIFICATION

4. Service of this Order on the First Defendant is dispensed with, pursuant to CPR 6.28 and 81.4(2)(c).
5. This Order be notified to the First Defendants by the Claimant carrying out each of the following steps:
 - (i) Uploading a copy on to the following website: <https://uk.rwe.com/injunction>
 - (ii) Affixing a copy of the Order in A4 size in a clear plastic envelope at prominent locations at each of the Sites shown edged red on Plans 1 to 6.
 - (iii) Affixing warning notices of A2 size at those locations at each of the sites shown edged red on Plans 1 to 6, substantially in the form of the notice at Schedule 3.
6. Notification to the First Defendants of any further applications or documents shall be effected by the Claimants carrying out each of the following steps:
 - (i) Uploading a copy of the application on to the following website: <https://uk.rwe.com/injunction>

- (ii) Affixing notices at or near the aforesaid prominent locations at the relevant Site/s shown edged red on Plans 1-6, stating that the application has been made or document/s provided and where the application or document/s can be accessed in hard copy and online.
7. In respect of paragraphs 5 and 6 above, effective notification will be deemed to have taken place in relation to each Site on the date on which all the relevant steps have been carried out.
 8. For the avoidance of doubt, in respect of the steps referred to at paragraphs 5(ii), 5(iii), and 6(ii), effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed or defaced without the Claimant's consent.
 9. The Claimant shall use reasonable endeavours to maintain and as the case may be replace the documents in their fixed positions and in legible form.
 10. In relation to the Second Defendant: pursuant to CPR rule 6.27, the Claimant has permission to serve the Second Defendant with this Order and any further applications or documents in the Claim by email to:
 - (i) exuk@greenpeace.org; and
 - (ii) jack.robirosa@greenpeace.org
 11. In relation to the Third Defendant: pursuant to CPR rule 6.27, the Claimant has permission to serve the Third Defendant with this Order and any further applications or documents in the Claim by email to:
 - (i) exuk@greenpeace.org; and
 - (ii) jack.robirosa@greenpeace.org
 12. The deemed date of service of any documents referred to in paragraphs 10 and 11 above shall be the day on which service is completed in accordance with paragraph 10 or 11 above.

13. The Claimant shall use reasonable endeavours to notify the owners (where known) of the areas of land shown hatched blue on Plans 1A, 2A, 4A, 5A and 6A at Annexure 2 to the Particulars of Claim of this Order by not later than 5pm on 31 October 2025.

VARIATION

14. Anyone interested may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant 48 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant at least 24 hours in advance of any hearing.
15. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
16. The Claimant has liberty to apply to vary this Order.

OTHER ORDERS

17. The Third Defendant is joined as a party to this claim pursuant to the Claimant's application dated 23 October 2025.
18. It shall be sufficient for the Claimant to notify the First Defendant of the application dated 23 October 2025 by undertaking the step specified in paragraph 6(i) of this Order, namely by uploading a copy of the application on to the following website:
<https://uk.rwe.com/injunction>.

COSTS

19. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

20. The Claimant's solicitors and their contact details are:

- (i) Carl Roche of Osborne Clarke LLP, email: carl.roche@osborneclarke.com
- (ii) Donal Kelly of Osborne Clarke LLP, email: donal.kelly@osborneclarke.com

Osborne Clarke LLP, One London Wall, London, EC2Y 5EB

COMMUNICATIONS WITH THE COURT

Chancery Division, The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL by the Court's e-filing service at <https://efile.cefile-app.com>

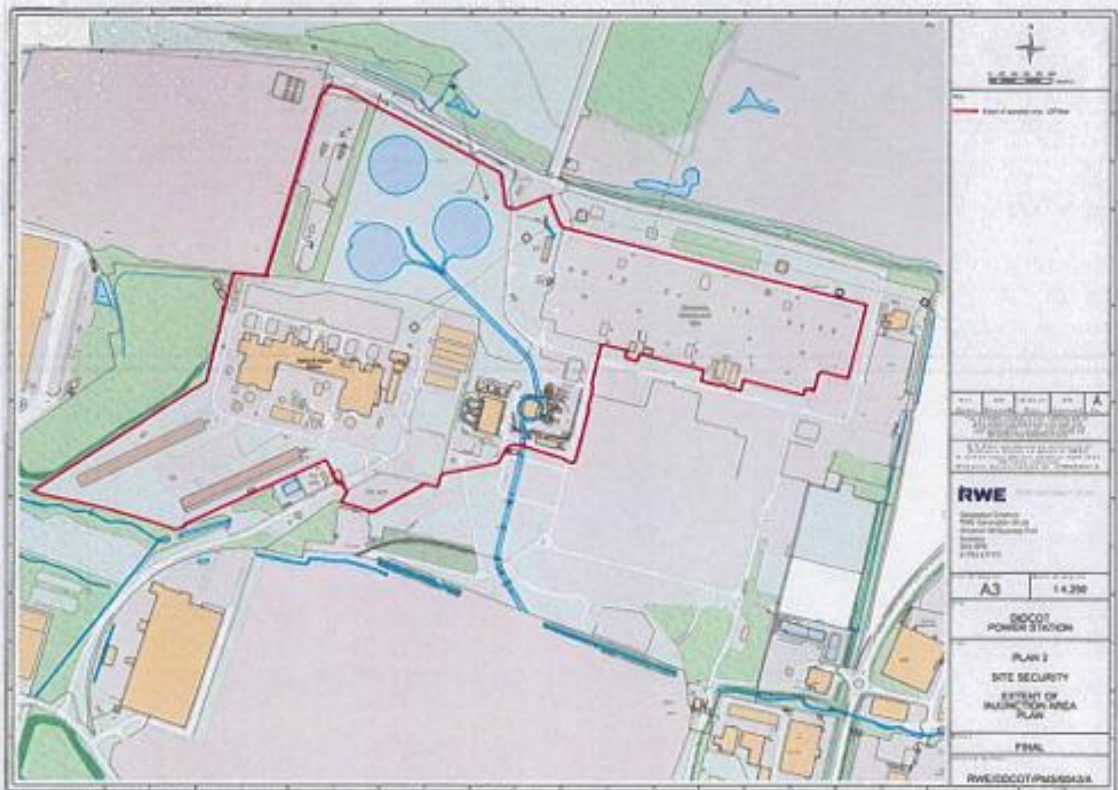
Dated: 24 October 2025

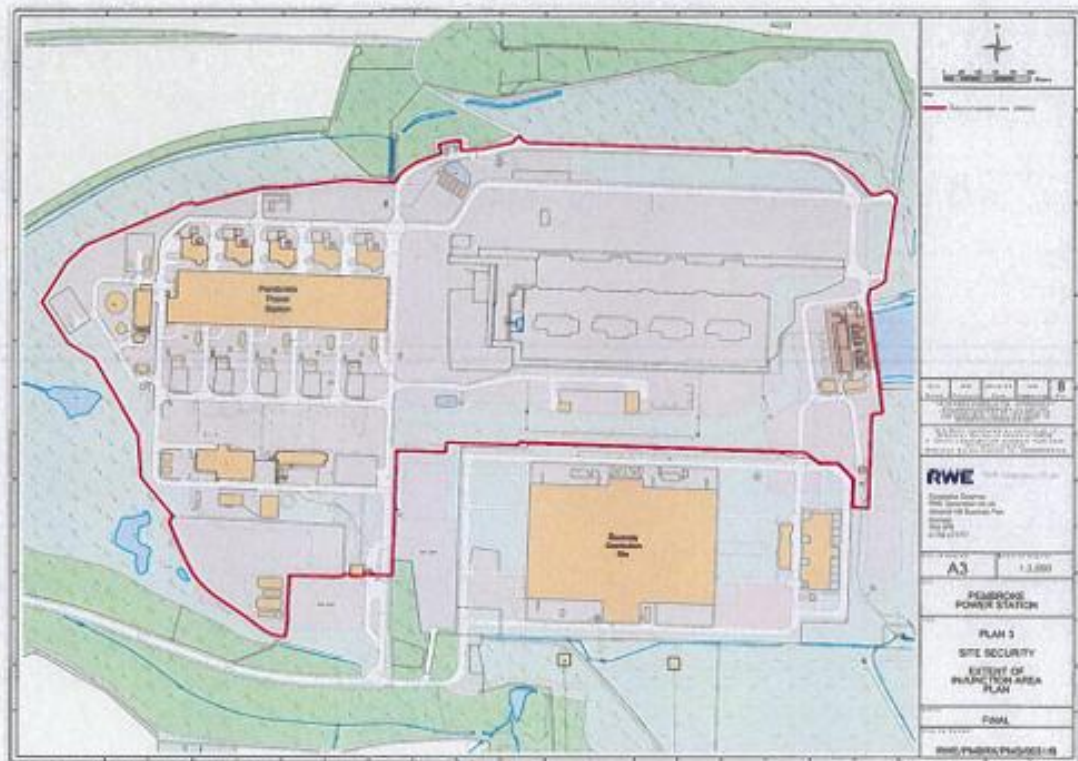
SCHEDULE 1 – CLAIMANT’S UNDERTAKINGS

1. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraphs 1 or 2 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 2 – PLANS







SCHEDULE 3- WARNING NOTICE

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 2025 exists relating to the land and premises known as

The injunction means you may not:

**FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR
DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE)
OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN
BEING**

[Plan]

**ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING
ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE
HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED
OR HAVE THEIR ASSETS SEIZED**

A copy of the Order and the legal proceedings to which it relates can be viewed at
<https://uk.rwe.com/injunction> or obtained by e-mailing injunctions@osborneclarke.com

**SCHEDULE 4 – UNDERTAKINGS GIVEN BY THE SECOND AND THIRD
DEFENDANTS**

Claim No: PT-2025-001017

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PROPERTY, TRUST AND PROBATE LIST



BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN THIRD DEFENDANT BREACH THE UNDERTAKING OFFERED BY YOU HEREIN OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THAT UNDERTAKING, YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

RECITALS

- A. On 3 October 2025, the court made an order on an ex parte basis restraining the Second Defendant from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises as set out in paragraph 1 of that order (the "Interim Order").
- B. The Interim Order was sealed by the court on 6 October 2025.

- C. The return date hearing is listed for 24 October 2025.
- D. The Third Defendant, without admission of liability, is willing to give an undertaking to the court on substantially the same terms as the Interim Order.
- E. The Claimant is willing to settle the Claim against the Third Defendant on the basis of the undertaking and the terms set out below.

Undertaking to the Court

1. Until the date 12 months from the date of this order or until further order of the court, whichever is earlier, the Third Defendant undertakes to the court that the Third Defendant will not:
 - i. enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the land and premises shown edged red on Plans 1 to 6 to this order, being:
 - a) Staythorpe Power Station, Staythorpe, Newark, NG23 5PS, as shown edged red on Plan 1;
 - b) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - c) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - d) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - e) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5; and
 - f) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6; and
 - ii. in respect of anything prohibited by paragraph i above, (a) do it himself / herself / themselves in any other way or (b) do it by means of another person acting on his / her / their behalf, or acting on his / her / their instructions.

Duration, Liberty to Apply and Variations

2. The undertaking shall take effect immediately and shall continue until the date 12 months from the date of this order or until further order of the court, whichever is earlier.
3. Upon the making of this Order, the Claim against the Third Defendant shall be stayed except for the purpose of giving effect to its terms and to the Third Defendant's undertaking.
4. Subject to the Third Defendant having complied with its undertaking and the terms of this Order, the claim against the Third Defendant shall be dismissed with no order as to costs on the date 12 months from the date of this Order.

Service

5. Service of this order may be effected by email to jack.robirosa@greenpeace.org and exuk@greenpeace.org.

Costs

5. There be no order as to the costs of and occasioned by this order and the undertaking recorded herein.

Statement of Acknowledgment by the Third Defendant

The Third Defendant understands that the undertaking above has the same force and effect as an order of the court. The Third Defendant understands that if it breaches this undertaking it may be held in contempt of court and may be imprisoned, fined and / or have its assets seized. The Third Defendant confirms that it has been advised that it should seek legal advice. The Third Defendant confirms that it understands the meaning and effect of the undertaking.

Signed: Jack Robirosa

Name: Jack Robirosa

For and on behalf of the Third Defendant

Date: 24 October 2025

OR

Signed: _____

[Solicitors' name], Solicitors for the Third Defendant

[Address, reference, email, telephone]

Date:

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

Before: The Honourable Mr Justice Trower

Dated: 24 October 2025

BETWEEN:

RWE GENERATION UK PLC

(Company registration number 3892782)

Claimant

and

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION
ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM
FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR
ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN
SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.**

(2) GREENPEACE UK LIMITED

(Company registration number 02463348)

(3) GREENPEACE LIMITED

(Company registration number 01314381)

Defendants

ORDER

The Court accepts the undertakings given by the Third Defendant in the Order hereby approved and attached, but any director of the Third Defendant desiring to contend that the person signing the undertaking on its behalf was not authorised to do so may apply for that purpose by not later than 4pm on 29 October 2025.

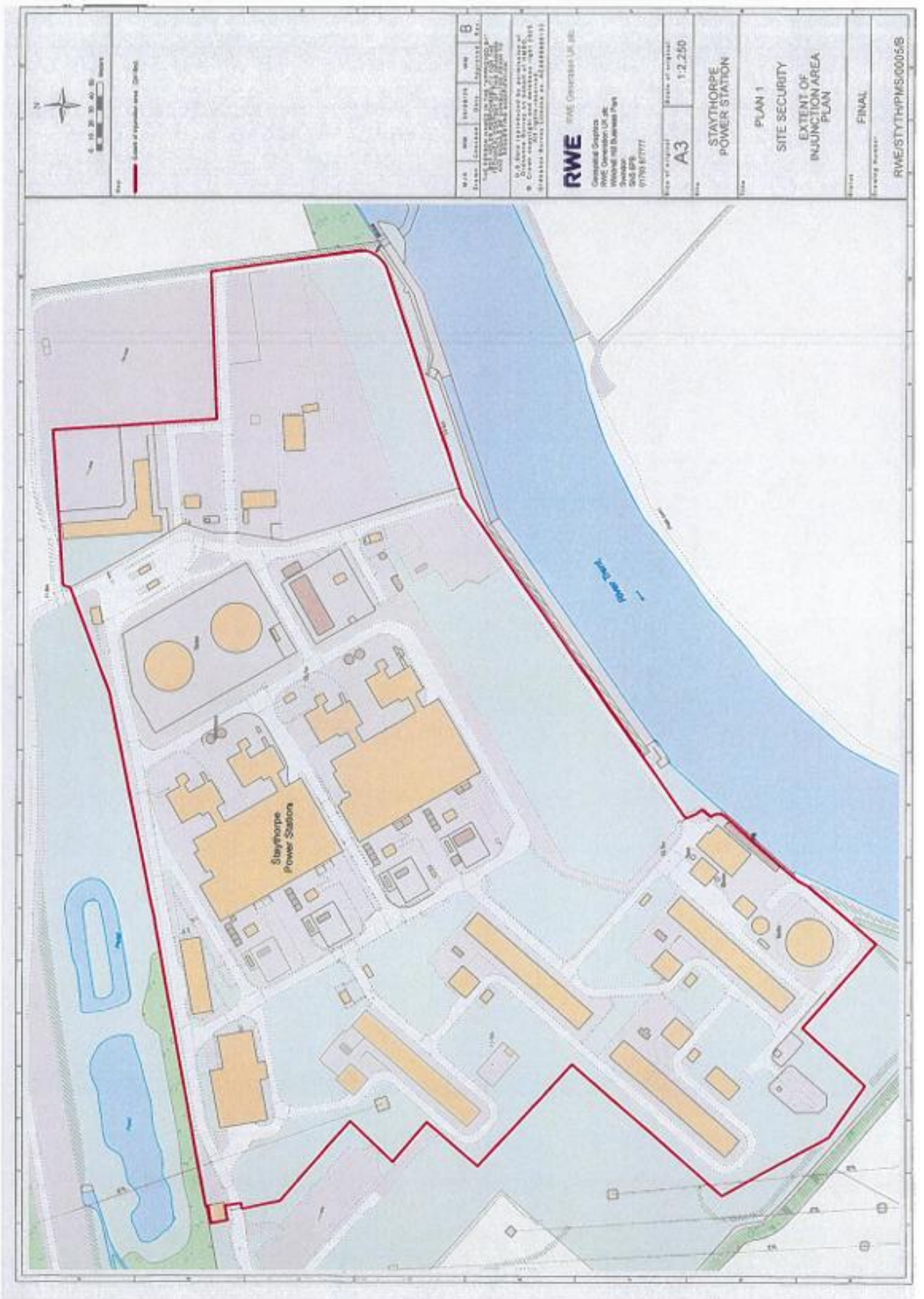
Judge's Endorsement

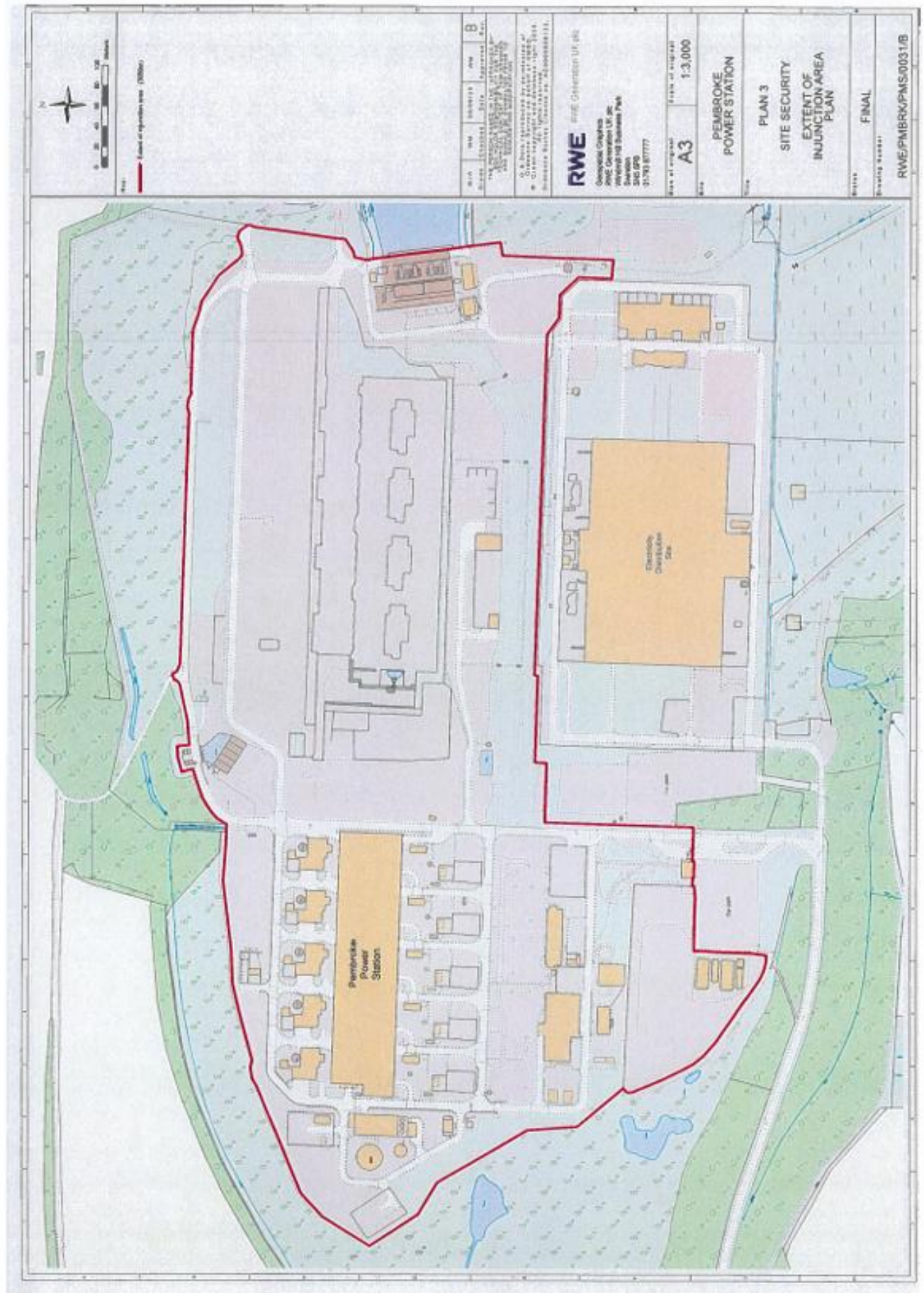
The Court notes and accepts the undertakings given by the Third Defendant recorded above.

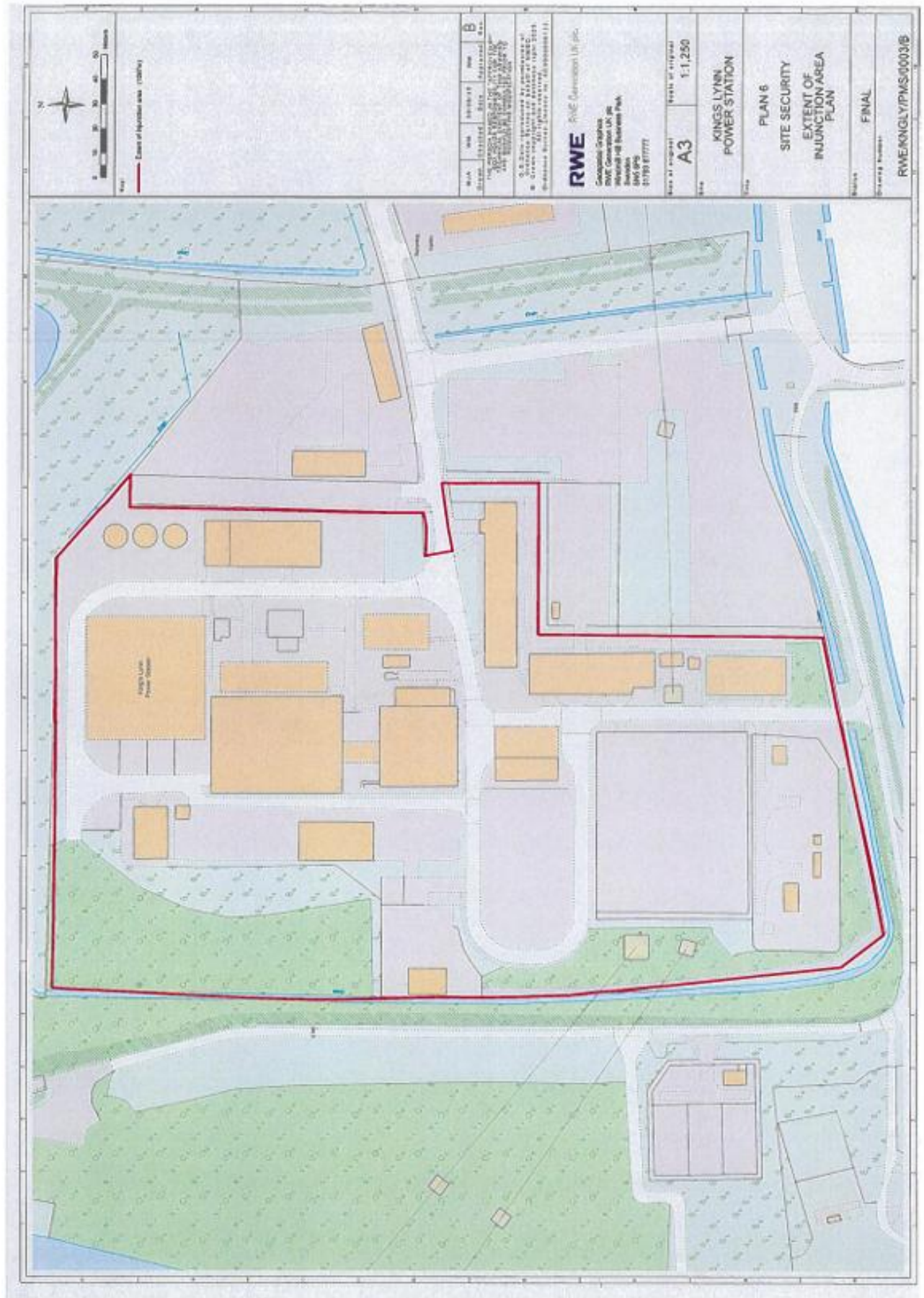
Dated: 24 Oct 2025

Judge: *Alison Rose*

SCHEDULE 1: PLANS 1-6







Claim No: PT-2025-001017

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PROPERTY, TRUST AND PROBATE LIST



BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)

Claimant

and

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR
REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE
OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES
OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR
OTHERWISE.**

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

**IF YOU THE WITHIN SECOND DEFENDANT BREACH THE UNDERTAKING OFFERED BY YOU
HEREIN OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THAT UNDERTAKING, YOU
MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE
YOUR ASSETS SEIZED.**

RECITALS

- A. On 3 October 2025, the court made an order on an ex parte basis restraining the Second Defendant from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises as set out in paragraph 1 of that order (the "Interim Order").

- B. The Interim Order was sealed by the court on 6 October 2025.
- C. The return date hearing is listed for 24 October 2025.
- D. The Second Defendant, without admission of liability, is willing to give an undertaking to the court on substantially the same terms as the Interim Order.
- E. The Claimant is willing to settle the Claim against the Second Defendant on the basis of the undertaking and the terms set out below.

Undertaking to the Court

1. Until the date 12 months from the date of this order or until further order of the court, whichever is earlier, the Second Defendant undertakes to the court that the Second Defendant will not:
 - i. enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the land and premises shown edged red on Plans 1 to 6 to this order, being:
 - a) Staythorpe Power Station, Staythorpe, Newark, NG23 5PS, as shown edged red on Plan 1;
 - b) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - c) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - d) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - e) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5; and
 - f) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6; and
 - ii. in respect of anything prohibited by paragraph i above, (a) do it himself / herself / themselves in any other way or (b) do it by means of another person acting on his / her / their behalf, or acting on his / her / their instructions.

Duration, Liberty to Apply and Variations

2. The undertaking shall take effect immediately and shall continue until the date 12 months from the date of this order or until further order of the court, whichever is earlier.
3. Upon the making of this Order, the Claim against the Second Defendant shall be stayed except for the purpose of giving effect to its terms and to the Second Defendant's undertaking.
4. Subject to the Second Defendant having complied with its undertaking and the terms of this Order, the claim against the Second Defendant shall be dismissed with no order as to costs on the date 12 months from the date of this Order.

Service

5. Service of this Order on the Second Defendant may be effected by email to jack.robirosa@greenpeace.org and exuk@greenpeace.org.

Costs

6. There be no order as to the costs of and occasioned by this order and the undertaking recorded herein.

Statement of Acknowledgment by the Second Defendant's representative

The Second Defendant understands that the undertaking above has the same force and effect as an order of the court. The Second Defendant understands that if it breaches this undertaking it may be held in contempt of court and may be imprisoned, fined and / or have its assets seized. The Second Defendant confirms that it has been advised that it should seek legal advice. The Second Defendant confirms that it understands the meaning and effect of the undertaking.

Signed: Jack Robirosa

Name: Jack Robirosa

For and on behalf of the Second Defendant

Date: 24 October 2025

OR

Signed: _____

[Solicitors' name], Solicitors for the Second Defendant

[Address, reference, email, telephone]

Date:

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

Before: The Honourable Mr Justice Trower

Dated: 24 October 2025

BETWEEN:

RWE GENERATION UK PLC

(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED

(Company registration number 02463348)

(3) GREENPEACE LIMITED

(Company registration number 01314381)

Defendants

ORDER

The Court accepts the undertakings given by the Second Defendant in the Order hereby approved and attached, but any director of the Second Defendant desiring to contend that the person signing the undertaking on its behalf was not authorised to do so may apply for that purpose by not later than 4pm on 29 October 2025.

Judge's Endorsement

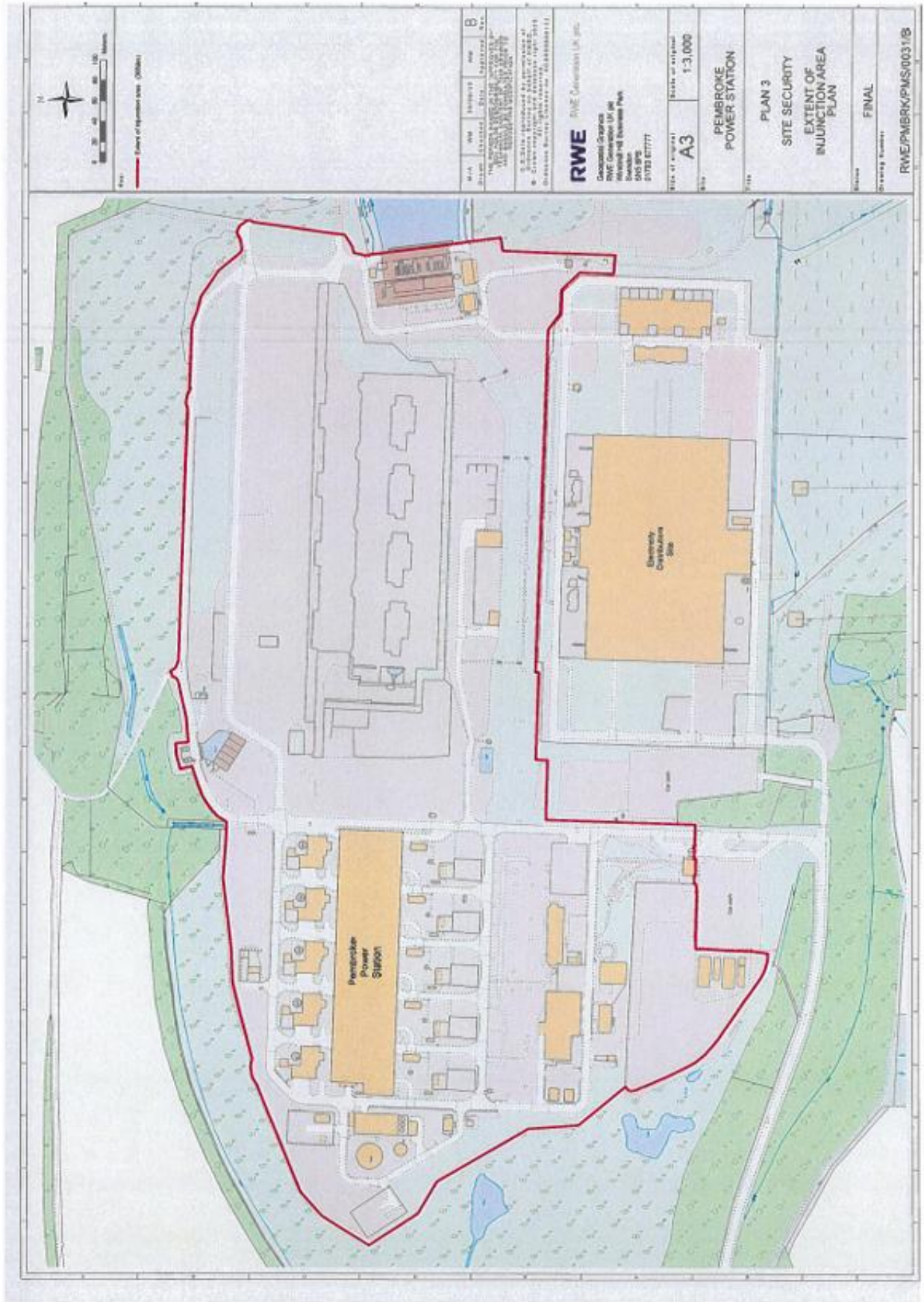
The Court notes and accepts the undertakings given by the Second Defendant recorded above.

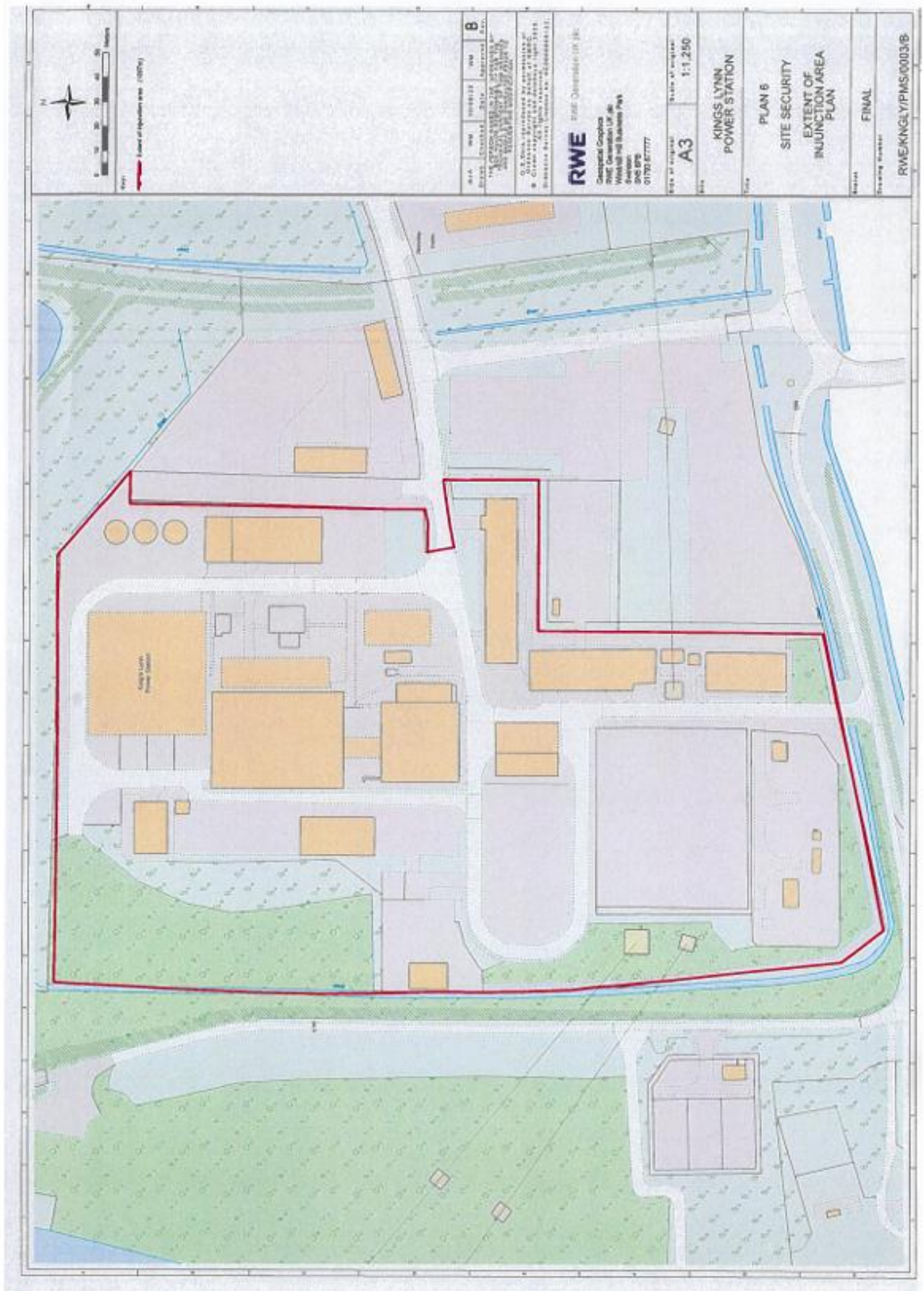
Dated: 24 Oct 2025

Judge: Helen Goss

SCHEDULE 1: PLANS 1-6

PLANS 1-6





SCHEDULE 2

1. Paragraph 10 of the Injunction Order shall be read as follows:

In relation to the Second Defendant: pursuant to CPR rule 6.27, the Claimant has permission to serve the Second Defendant with this Order and any further applications or documents in the Claim, insofar as the Claim is continuing as against the Second Defendant, by email to:

- (i) exuk@greenpeace.org; and*
- (ii) jack.robirosa@greenpeace.org*

2. Paragraph 11 of the Injunction Order shall be read as follows:

In relation to the Third Defendant: pursuant to CPR rule 6.27, the Claimant has permission to serve the Third Defendant with this Order and any further applications or documents in the Claim, insofar as the Claim is continuing as against the Third Defendant, by email to:

- (i) exuk@greenpeace.org; and*
- (ii) jack.robirosa@greenpeace.org*

On behalf of: Claimant
Witness: William Henry Jeffery
No. of witness statement: 2
Exhibit(s): WHJ2
Date made: 01 October 2026

Claim No. PT-2025-001017

IN THE HIGH COURT OF JUSTICE

BUSINESS AND PROPERTY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE Generation UK PLC

Claimant

And

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION
ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR
WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM,
FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY
GREENPEACE CAMPAIGN OR OTHERWISE**

(2) Greenpeace UK Limited

(3) Greenpeace Limited

Defendants

SECOND WITNESS STATEMENT OF WILLIAM HENRY JEFFERY

I, William Henry Jeffery of Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire SN5 6PB am the Head of Asset Management for RWE Generation UK PLC and have been in this role since April 2021. I have worked for the Claimant and its predecessor companies since September 1987. I state as follows:

1. I make this statement on behalf of the Claimant. I am duly authorised to do so.
2. This is my second witness statement in these proceedings. I make it in support of the Claimant's position at the first annual review hearing of the order made by the Honourable Mr Justice Trower on 24 October 2025 (the "**Order**"), listed to be heard in the three-day window of 19 to 21 October 2026 (the "**Review Hearing**").
3. Unless stated to the contrary, the facts set out in this statement are within my own knowledge and from information provided to me by others. Where facts are within my knowledge, I confirm that they are true. Where the facts were supplied by others, or are derived from documents, this is indicated and I confirm that they are true to the best of my knowledge, information and belief.
4. For the purposes of this statement, as part of the evidence before the Court at this Review Hearing, I refer to and adopt the contents of my first witness statement dated 1 October 2025, which was filed in support of the Claimant's original application for injunctive relief. Unless otherwise indicated, I continue to use the defined terms as set out in my first witness statement.
5. A list of documents is set out at the beginning of a paginated bundle of documents marked Exhibit "**WHJ2**". This list identifies the documents to which I refer or which have been referred to me for the purposes of providing evidence in this witness statement. The documents themselves are true copies of the documents to which I shall refer in this witness statement. References in this witness statement to page numbers in Exhibit "**WHJ2**" are in the format "[**WHJ2/page(s)**]".

SECOND AND THIRD DEFENDANTS

6. On 24 October 2025, the Second Defendant and the Third Defendant each gave undertakings to the Court, recorded in separate orders of the Honourable Mr Justice Trower dated 24 October 2025 (the "**Defendant Undertaking Orders**"). Pursuant to those undertakings, each of the Second Defendant and the Third Defendant undertook not to enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the Large Power Stations, on substantially the same terms as the injunction granted against the First Defendant. I exhibit copies of the Defendant Undertaking Orders at [WHJ2/3-27].

7. To the best of my knowledge, information and belief, both the Second Defendant and the Third Defendant have complied with the Defendant Undertakings throughout the period since they were given.
8. In accordance with paragraph 4 of each of the Defendant Undertaking Orders, and subject to the Second Defendant and the Third Defendant having complied with their respective undertakings and the terms of those orders, the claims against the Second Defendant and the Third Defendant shall respectively stand dismissed with no order as to costs on the date 12 months from the date of those orders, namely 24 October 2026.

REASONS FOR CONTINUATION OF THE ORDER AGAINST THE FIRST DEFENDANT

9. The Claimant seeks the continuation of the Order against the First Defendant (Persons Unknown) for a further 12 months. I set out below the reasons for doing so from the perspective of the Claimant's operations and the continuing risks to its Large Power Stations.

No breach of the Order

10. The Claimant is not aware of any breach of the injunction by any person since it was made on 24 October 2025 (nor in respect of the interim injunction granted on 3 October 2025). I am not aware of any individual having trespassed upon or attempted to trespass upon any of the Large Power Stations in the manner restrained by the Order. I believe that the Order has acted as an effective deterrent to persons who might otherwise contemplate unlawful direct action at the Claimant's Large Power Stations.
11. I consider that the absence of any breach since the Order was granted is itself a strong indicator of its deterrent effect.
12. The risk of unlawful direct action at the Claimant's Large Power Stations was triggered by the Greenpeace campaign concerning gas-fired power generation, which remains an ongoing campaign. The issues raised by that campaign continue to attract public attention and concern, and the Claimant has no reason to believe that the underlying risk of direct action motivated by those issues has diminished since the Order was granted.
13. Greenpeace has publicly celebrated the trespass action that occurred at the Claimant's Staythorpe Power Plant on 22 September 2025 (the "**Incident**"). In

particular, Greenpeace published an article on its website entitled "We Won! The Great Gas Rip Off is finally ending" (the "**Greenpeace Article**"), in which it celebrated the outcome of the Incident. I exhibit a printed copy of the Greenpeace Article at [WHJ2/28-34].

- 13.1 A section of Greenpeace's website is entitled "Become a trained Greenpeace activist", which encourages individuals to participate in "direct actions", whilst at the same time:

- (1) making it clear that legal action may be taken against such individuals; and
- (2) expressly acknowledging that direction action uses "creative tactics to disrupt their [the individuals'] operations and draw public attention to what they're [the individuals are] doing"

(the "**Website Extract**"). I exhibit a printed copies of the Website Extract at [WHJ2/35-53].

- 13.2 I note that the content of the Website Extract has been amended by Greenpeace since the date of my first witness statement. At the time my first witness statement was filed on 1 October 2025, the relevant section of Greenpeace's website, under the heading "Five things to know about being an activist", included at point 5 the following statement: "Being an activist means taking calculated risks. Actions and protests are often illegal, so activists in some roles risk getting a criminal conviction" (as exhibited at [WHJ1/142]). That wording has since been removed or altered. The current version of the Website Extract, as exhibited at [WHJ2/36], no longer contains that express acknowledgment.
14. The effect of the Greenpeace Article and the Website Extract has been to place the details of the Incident, the identity and location of the Staythorpe Power Plant and the broader campaign firmly in the public domain.
15. I consider that the Greenpeace Article and Website Extract are relevant because:
- 15.1 the Incident has been presented publicly as a successful and effective form of protest;
- 15.2 direct action in general is promoted as a means of protest; and

- 15.3 as a result, the clear message that individuals who are associated with or sympathetic to Greenpeace's campaigns may take from such materials is that direct action, including unlawful action, at the Large Power Stations may be necessary and appropriate to effect change.
16. I am further concerned that, by reason of the Incident and Greenpeace's subsequent public celebration of it (by way of the Greenpeace Article), the details of the Incident, including the manner in which access to the Staythorpe Power Plant was obtained, have been widely disseminated into the public domain. That dissemination cannot now be undone. The effect is that the risk of further unlawful direct action at the Claimant's Large Power Stations is no longer confined to Greenpeace or its affiliates, but extends to any person who may have been emboldened or inspired by the publicity surrounding the Incident to attempt similar action. The Claimant therefore remains exposed to a real and continuing risk of trespass and other unlawful conduct by persons falling within the class of the First Defendant.
17. I am very concerned that, given publicity generated by the Incident and the fact that the Greenpeace campaign is ongoing, this gives rise to a risk not only of lawful protest but also unlawful direct action, including further trespass, either at the Staythorpe Power Plant or any of the Large Power Stations.
18. The broad class of potential protesters captured by the definition of "Persons Unknown" in the Order reflects the reality that:
- 18.1 it is not possible to identify in advance all individuals who may seek to engage in unlawful direct action at the Large Power Stations; and
- 18.2 the risk does not come exclusively from Greenpeace or its members, but extends to other individuals who may be inspired or galvanised by Greenpeace's public campaign and its celebration of the Incident.
19. I am informed by the Claimant's solicitors that the threat of unlawful direct action is not unique to the Claimant's Large Power Stations. I am informed that a number of other energy industry companies and operators of critical national infrastructure have obtained comparable injunctions to protect their sites from protest-related trespass and other unlawful conduct. I am further informed that several of those injunctions have been continued on review during the course of 2025, including the injunctions in favour of Valero Energy Ltd and others (renewed on 24 January 2025)

by Mrs Justice Hill and by Mrs Justice Lambert DBE on 23 February 2026), ESSO Petroleum Company Limited and another (renewed on 9 July 2025 by Mr Justice Sweeting and on 22 July 2026 by Mrs Justice Tipples), and UK Oil Pipelines Ltd and others (renewed on 20 November 2024 by Mr Justice Miles). In each case, the injunction was continued notwithstanding the absence of further protest activity at the relevant sites.

20. I am also aware of continuing protest activity directed at gas-fired power generation, including against the Claimant, in other countries such as Germany.

20.1 On 30 May 2026, Greenpeace and other environmental groups staged protests against:

(1) the Claimant's plans to erect a new gas-fired power plant in Hamm, Germany; and

(2) the German government's wider plans for the expansion of gas power stations in the surrounding area.

I exhibit copies of Greenpeace's press release dated 28 April 2026 (in German and English) at [WHJ2/54-65] and copies of a separate press release from Clean Energy Wire dated 29 May 2026 at [WHJ2/66-71].

20.2 In September 2026, a sabotage attack on the German power grid was reported to have been linked to climate extremism. A press report of this incident is annexed to this statement at Exhibit [WHJ2/72-78].

21. These developments demonstrate that the threat of unlawful direct action against gas-fired power infrastructure is wide spread and continuing. The risk of similar action at the Claimant's Large Power Stations remains real and current.

22. In all these circumstances, the Claimant, with strong reason, remains genuinely concerned that without the continued protection of the Order, further unlawful direct action by persons within the First Defendant class could occur at one or more of the Large Power Stations at any time and without prior warning.

The risks of further trespass remain unchanged

23. The risks that were identified in my first witness statement regarding the safety of protesters, the Claimant's employees and emergency services remain exactly as I

described. The same can be said of the risk to the Claimant's financial interests. I do not repeat that evidence here, but I confirm that, to the best of my knowledge and belief, those risks remain current and applicable.

24. In respect of the stability of the National Grid, I note that the National Energy System Operator ("**NESO**") issued a number of Electricity Margin Notices ("**EMNs**") over the summer of 2026 and as recently as 28 September 2026, during periods of unexpectedly low renewable generation. An EMN is an official warning issued by a power grid operator to electricity generators and market participants when the buffer between available power supply and expected demand becomes narrower than safely required. These were widely reported in the press and I enclose examples of some of the articles published on 24 June 2026 and 28 September 2026 at [WHJ2/79-91]. In my view, those reports about the tightness of grid margins serve to illustrate the importance of stations such as the Claimant's Large Power Stations to the stability of the national electricity system. The consequences of a trespass, which could lead to a forced shutdown at any of the Large Power Stations would be particularly acute during such periods, when the system is already under strain and reliant upon gas-fired generation to maintain security of supply.

The cross-undertaking in damages

25. The Claimant continues to offer the cross-undertaking in damages recorded in Schedule 1 to the Order, namely that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

Full and frank disclosure

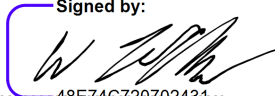
26. The Claimant is aware of its ongoing duty of full and frank disclosure, and I confirm that I have set out above all relevant factual matters within my knowledge, including those which might be relied upon as tending against the continuation of the Order.
27. In the interests of full and frank disclosure, I confirm that the Claimant has not encountered any protest activity at any of the Large Power Stations in breach of the Order since it was granted on 24 October 2025.

CONCLUSION

28. I respectfully request on behalf of the Claimant that the Court continue the injunction previously granted.

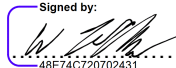
CONFIRMATION OF COMPLIANCE

This witness statement sets out only my personal knowledge and recollection, in my own words. On points that I understand to be important in the case, I have stated honestly (a) how well I recall matters and (b) whether my memory has been refreshed by considering documents, if so how and when. I have not been asked or encouraged by anyone to include in this statement anything that is not my own account, to the best of my ability and recollection, of events I witnessed or matters of which I have personal knowledge.

Signed by: 
Signed: ..48E74C720702431+...

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.

Dated: 01/10/2026
Signed by: 
Signed: ..48E74C720702431+...
Full name: William Henry Jeffery

CERTIFICATE OF COMPLIANCE

1. I am the relevant legal representative within the meaning of Practice Direction 57AC.
2. I am satisfied that the purpose and proper content of trial witness statements, and proper practice in relation to their preparation, including the witness confirmation

required by paragraph 4.1 of Practice Direction 57AC, have been discussed with and explained to William Henry Jeffery.

3. I believe this trial witness statement complies with Practice Direction 57AC and paragraphs 18.1 and 18.2 of Practice Direction 32, and that it has been prepared in accordance with the Statement of Best Practice contained in the Appendix to Practice Direction 57AC.



Signed:

Name: Donal Patrick Kelly

Position: Legal Director for Osborne Clarke LLP

Date: 1 October 2026
Date:

On behalf of: Claimant
Witness: William Henry Jeffery
No. of witness statement: 2
Exhibit(s): WHJ2
Date made: 01 October 2026

Claim No. PT-2025-001017

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY DIVISION
PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE Generation UK PLC

Claimant

And

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION
ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR
WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM,
FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY
GREENPEACE CAMPAIGN OR OTHERWISE

(2) Greenpeace UK Limited

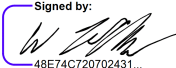
(3) Greenpeace Limited

Defendants

**EXHIBIT WHJ2 TO THE SECOND WITNESS STATEMENT OF WILLIAM HENRY
JEFFERY**

This is the exhibit marked "**WHJ2**" referred to in the Second Witness Statement of
William Henry Jeffery dated 01 October 2026.

Dated: 01/10/2026

Signed: 
48E74C720702431...
William Henry Jeffery

No.	Document	Page(s)
1.	Defendant Undertaking Orders	3-27
2.	Greenpeace Article – "We Won! The Great Gas Rip Off is finally ending"	28-34
3.	Website Extract – "Become a trained Greenpeace activist"	35-53
4.	Greenpeace's press release dated 28 April 2026 (in German and English)	54-65
5.	Press release from Clean Energy Wire dated 29 May 2026	66-71
6.	Press Report – BBC Article – German power grid reported to have been linked to climate extremism	72-78
7.	Sky News Article – Electricity Margin Notices – published on 24 June 2026 & 28 September 2026	79-91

**SCHEDULE 4 – UNDERTAKINGS GIVEN BY THE SECOND AND THIRD
DEFENDANTS**

Claim No: PT-2025-001017

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PROPERTY, TRUST AND PROBATE LIST



BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN THIRD DEFENDANT BREACH THE UNDERTAKING OFFERED BY YOU HEREIN OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THAT UNDERTAKING, YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

RECITALS

- A. On 3 October 2025, the court made an order on an ex parte basis restraining the Second Defendant from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises as set out in paragraph 1 of that order (the "Interim Order").
- B. The Interim Order was sealed by the court on 6 October 2025.

- C. The return date hearing is listed for 24 October 2025.
- D. The Third Defendant, without admission of liability, is willing to give an undertaking to the court on substantially the same terms as the Interim Order.
- E. The Claimant is willing to settle the Claim against the Third Defendant on the basis of the undertaking and the terms set out below.

Undertaking to the Court

- 1. Until the date 12 months from the date of this order or until further order of the court, whichever is earlier, the Third Defendant undertakes to the court that the Third Defendant will not:
 - i. enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the land and premises shown edged red on Plans 1 to 6 to this order, being:
 - a) Staythorpe Power Station, Staythorpe, Newark, NG23 5PS, as shown edged red on Plan 1;
 - b) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - c) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - d) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - e) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5; and
 - f) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6; and
 - ii. in respect of anything prohibited by paragraph i above, (a) do it himself / herself / themselves in any other way or (b) do it by means of another person acting on his / her / their behalf, or acting on his / her / their instructions.

Duration, Liberty to Apply and Variations

- 2. The undertaking shall take effect immediately and shall continue until the date 12 months from the date of this order or until further order of the court, whichever is earlier.
- 3. Upon the making of this Order, the Claim against the Third Defendant shall be stayed except for the purpose of giving effect to its terms and to the Third Defendant's undertaking.
- 4. Subject to the Third Defendant having complied with its undertaking and the terms of this Order, the claim against the Third Defendant shall be dismissed with no order as to costs on the date 12 months from the date of this Order.

Service

- 5. Service of this order may be effected by email to jack.robirosa@greenpeace.org and exuk@greenpeace.org.

Costs

5. There be no order as to the costs of and occasioned by this order and the undertaking recorded herein.

Statement of Acknowledgment by the Third Defendant

The Third Defendant understands that the undertaking above has the same force and effect as an order of the court. The Third Defendant understands that if it breaches this undertaking it may be held in contempt of court and may be imprisoned, fined and / or have its assets seized. The Third Defendant confirms that it has been advised that it should seek legal advice. The Third Defendant confirms that it understands the meaning and effect of the undertaking.

Signed: Jack Robirosa

Name: Jack Robirosa

For and on behalf of the Third Defendant

Date: 24 October 2025

OR

Signed: _____

[Solicitors' name], Solicitors for the Third Defendant

[Address, reference, email, telephone]

Date:

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

Before: The Honourable Mr Justice Trower

Dated: 24 October 2025

BETWEEN:

RWE GENERATION UK PLC

(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED

(Company registration number 02463348)

(3) GREENPEACE LIMITED

(Company registration number 01314381)

Defendants

ORDER

The Court accepts the undertakings given by the Third Defendant in the Order hereby approved and attached, but any director of the Third Defendant desiring to contend that the person signing the undertaking on its behalf was not authorised to do so may apply for that purpose by not later than 4pm on 29 October 2025.

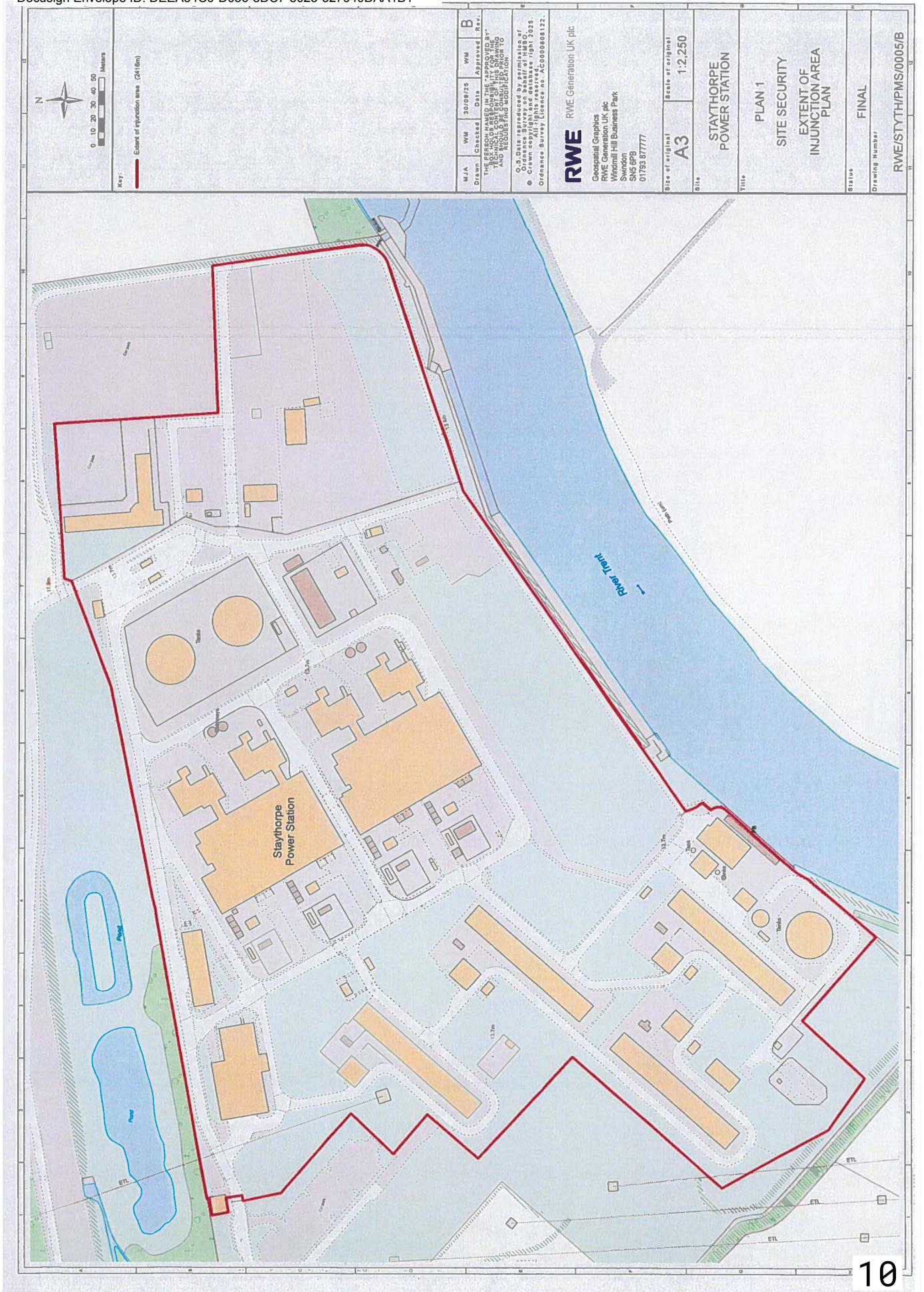
Judge's Endorsement

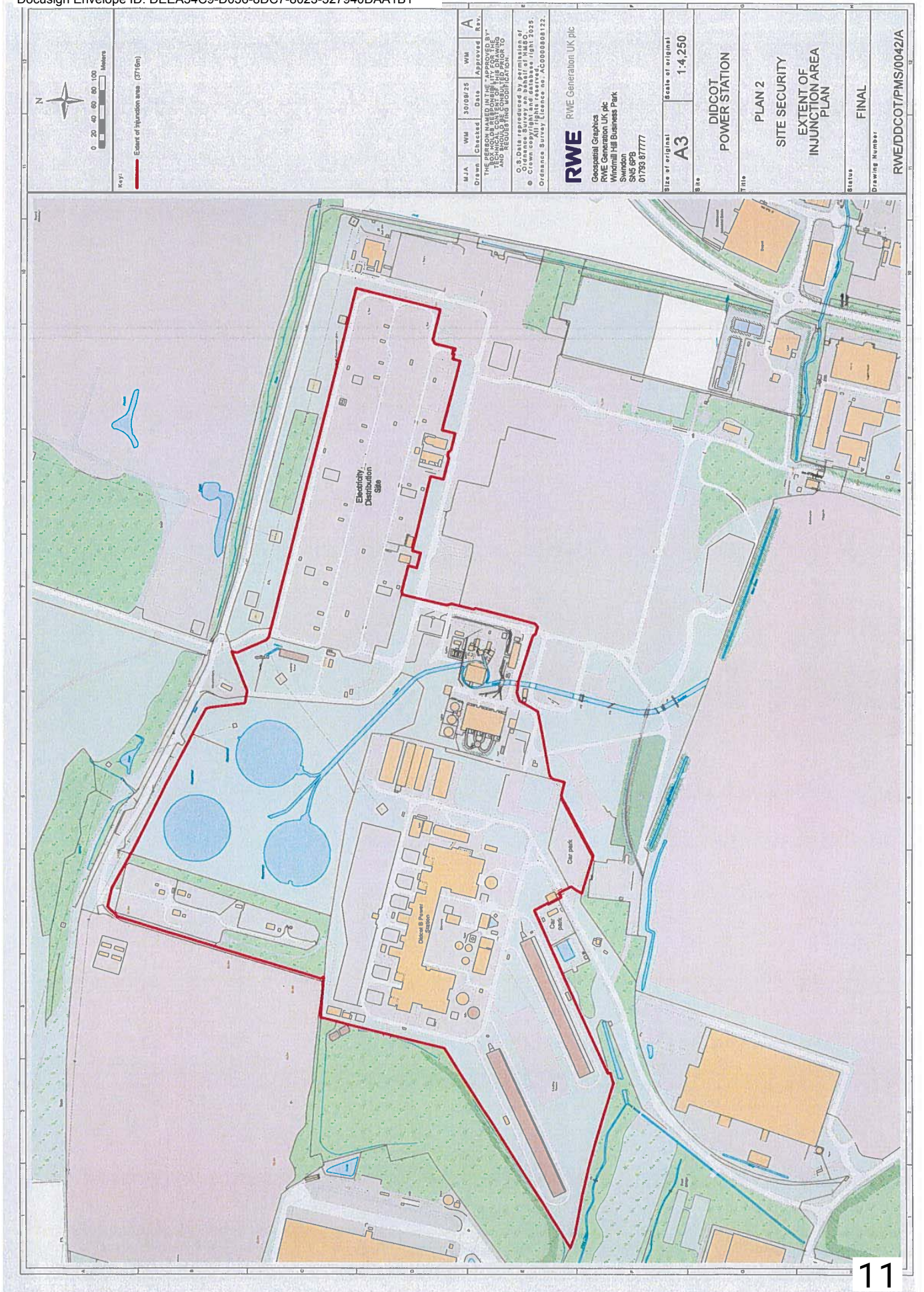
The Court notes and accepts the undertakings given by the Third Defendant recorded above.

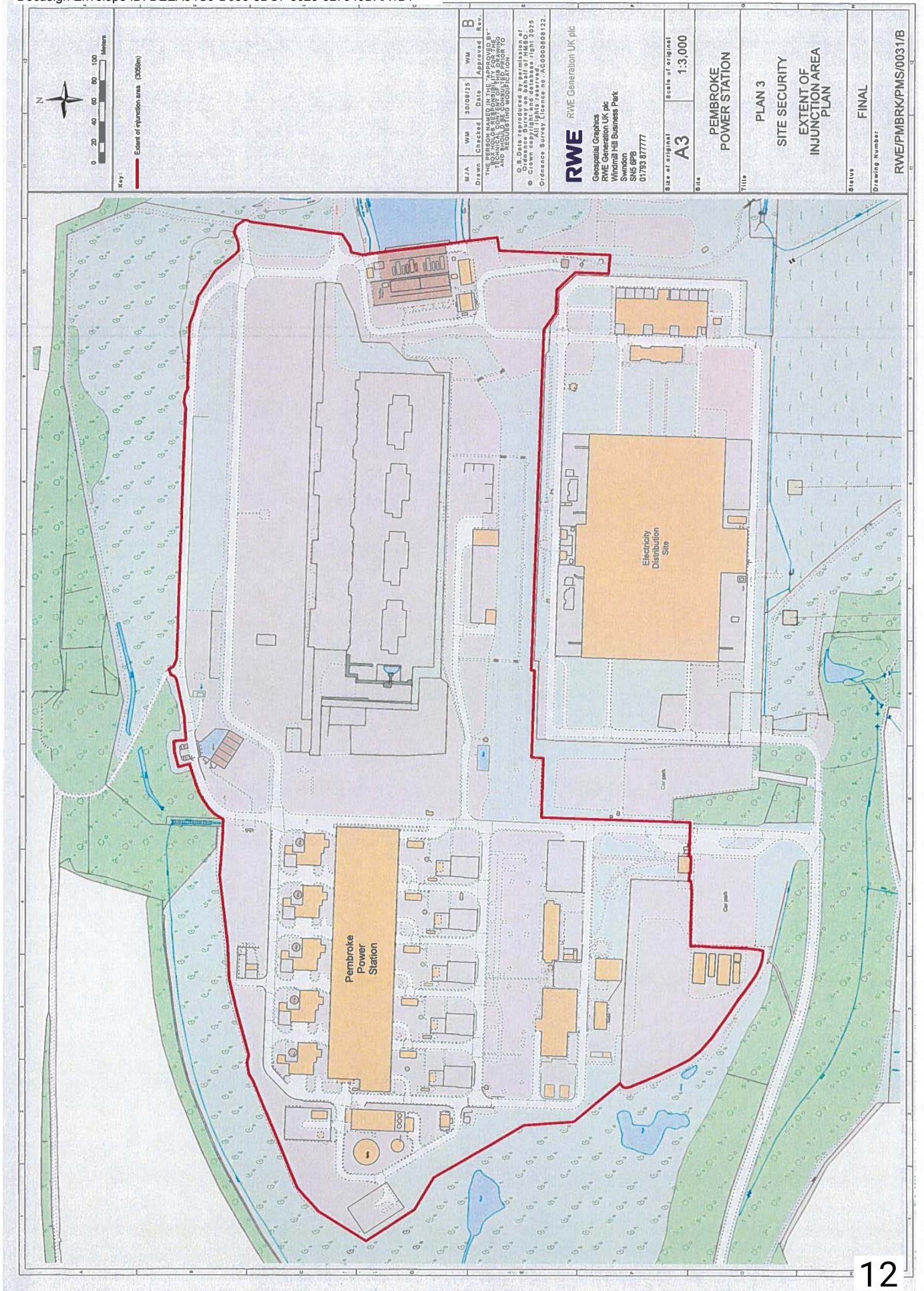
Dated: 24 Oct 2025

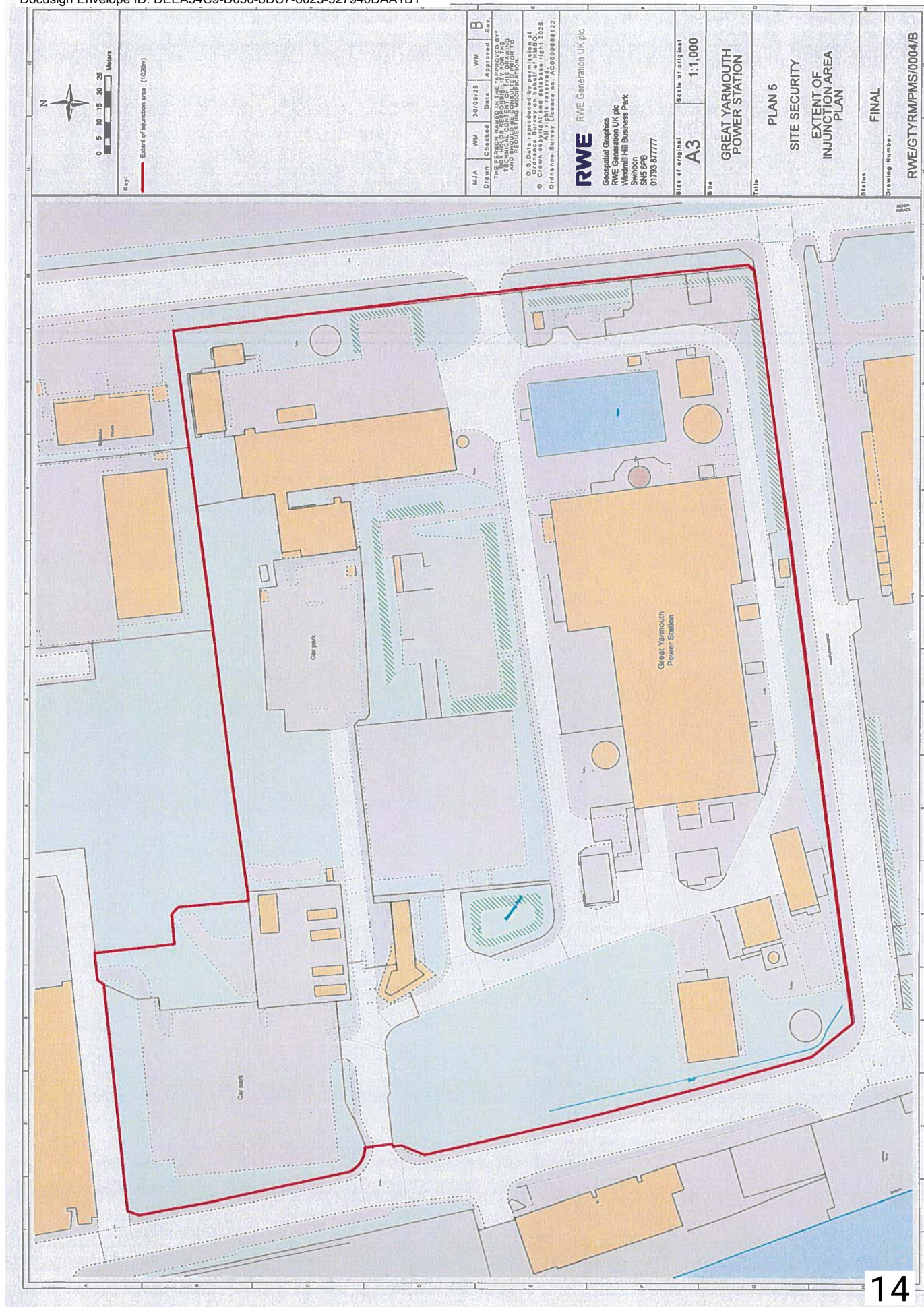
Judge: [Signature]

SCHEDULE 1: PLANS 1-6









Claim No: PT-2025-001017

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PROPERTY, TRUST AND PROBATE LIST



BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN SECOND DEFENDANT BREACH THE UNDERTAKING OFFERED BY YOU HEREIN OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THAT UNDERTAKING, YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

RECITALS

- A. On 3 October 2025, the court made an order on an ex parte basis restraining the Second Defendant from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises as set out in paragraph 1 of that order (the "Interim Order").

- B. The Interim Order was sealed by the court on 6 October 2025.
- C. The return date hearing is listed for 24 October 2025.
- D. The Second Defendant, without admission of liability, is willing to give an undertaking to the court on substantially the same terms as the Interim Order.
- E. The Claimant is willing to settle the Claim against the Second Defendant on the basis of the undertaking and the terms set out below.

Undertaking to the Court

1. Until the date 12 months from the date of this order or until further order of the court, whichever is earlier, the Second Defendant undertakes to the court that the Second Defendant will not:
 - i. enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the land and premises shown edged red on Plans 1 to 6 to this order, being:
 - a) Staythorpe Power Station, Staythorpe, Newark, NG23 5PS, as shown edged red on Plan 1;
 - b) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - c) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - d) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - e) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5; and
 - f) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6; and
 - ii. in respect of anything prohibited by paragraph i above, (a) do it himself / herself / themselves in any other way or (b) do it by means of another person acting on his / her / their behalf, or acting on his / her / their instructions.

Duration, Liberty to Apply and Variations

2. The undertaking shall take effect immediately and shall continue until the date 12 months from the date of this order or until further order of the court, whichever is earlier.
3. Upon the making of this Order, the Claim against the Second Defendant shall be stayed except for the purpose of giving effect to its terms and to the Second Defendant's undertaking.
4. Subject to the Second Defendant having complied with its undertaking and the terms of this Order, the claim against the Second Defendant shall be dismissed with no order as to costs on the date 12 months from the date of this Order.

Service

5. Service of this Order on the Second Defendant may be effected by email to jack.robirosa@greenpeace.org and exuk@greenpeace.org.

Costs

6. There be no order as to the costs of and occasioned by this order and the undertaking recorded herein.

Statement of Acknowledgment by the Second Defendant's representative

The Second Defendant understands that the undertaking above has the same force and effect as an order of the court. The Second Defendant understands that if it breaches this undertaking it may be held in contempt of court and may be imprisoned, fined and / or have its assets seized. The Second Defendant confirms that it has been advised that it should seek legal advice. The Second Defendant confirms that it understands the meaning and effect of the undertaking.

Signed: Jack Robirosa

Name: Jack Robirosa

For and on behalf of the Second Defendant

Date: 24 October 2025

OR

Signed: _____

[Solicitors' name], Solicitors for the Second Defendant

[Address, reference, email, telephone]

Date:

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

Before: The Honourable Mr Justice Trower

Dated: 24 October 2025

BETWEEN:

RWE GENERATION UK PLC

(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED

(Company registration number 02463348)

(3) GREENPEACE LIMITED

(Company registration number 01314381)

Defendants

ORDER

The Court accepts the undertakings given by the Second Defendant in the Order hereby approved and attached, but any director of the Second Defendant desiring to contend that the person signing the undertaking on its behalf was not authorised to do so may apply for that purpose by not later than 4pm on 29 October 2025.

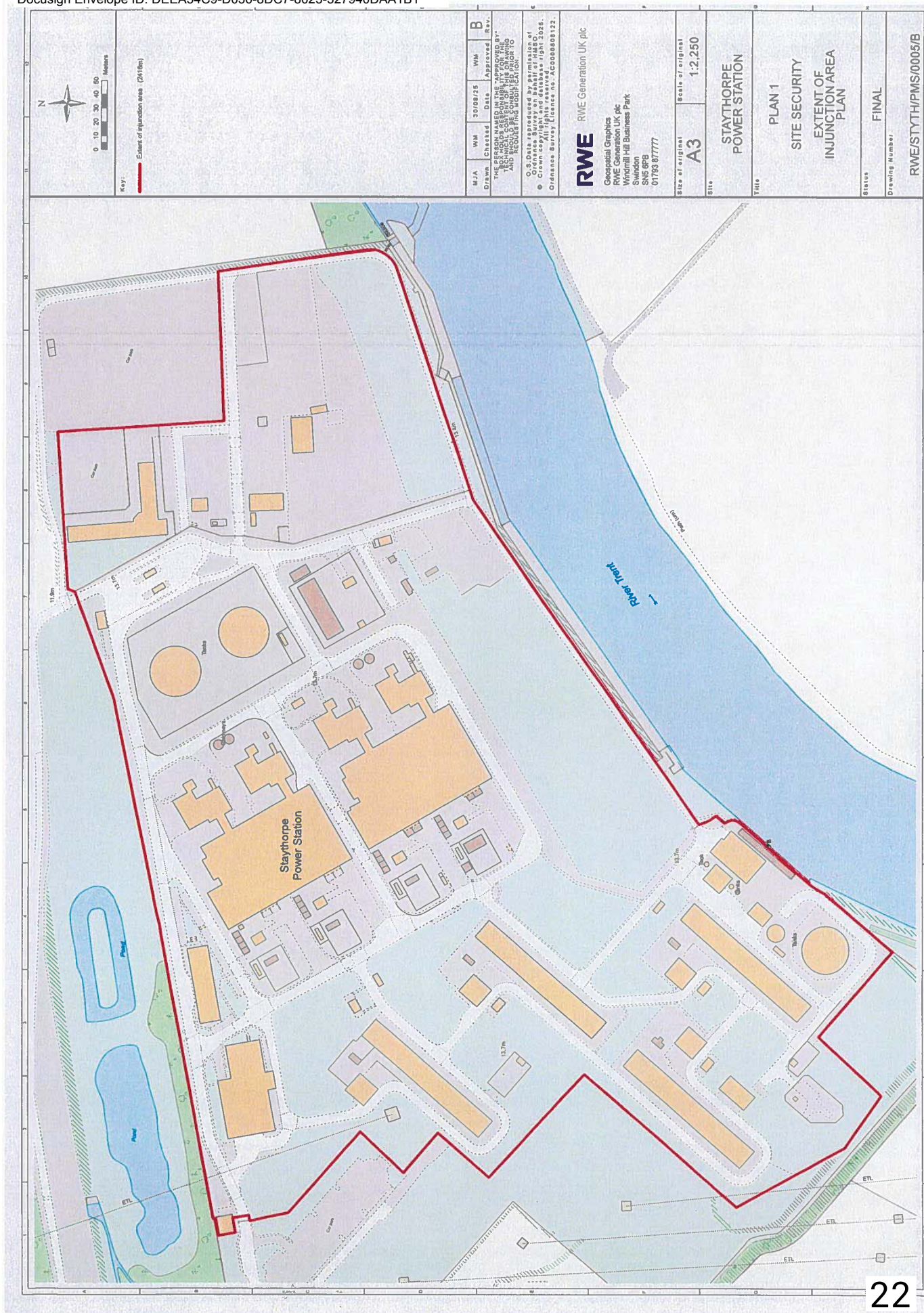
Judge's Endorsement

The Court notes and accepts the undertakings given by the Second Defendant recorded above.

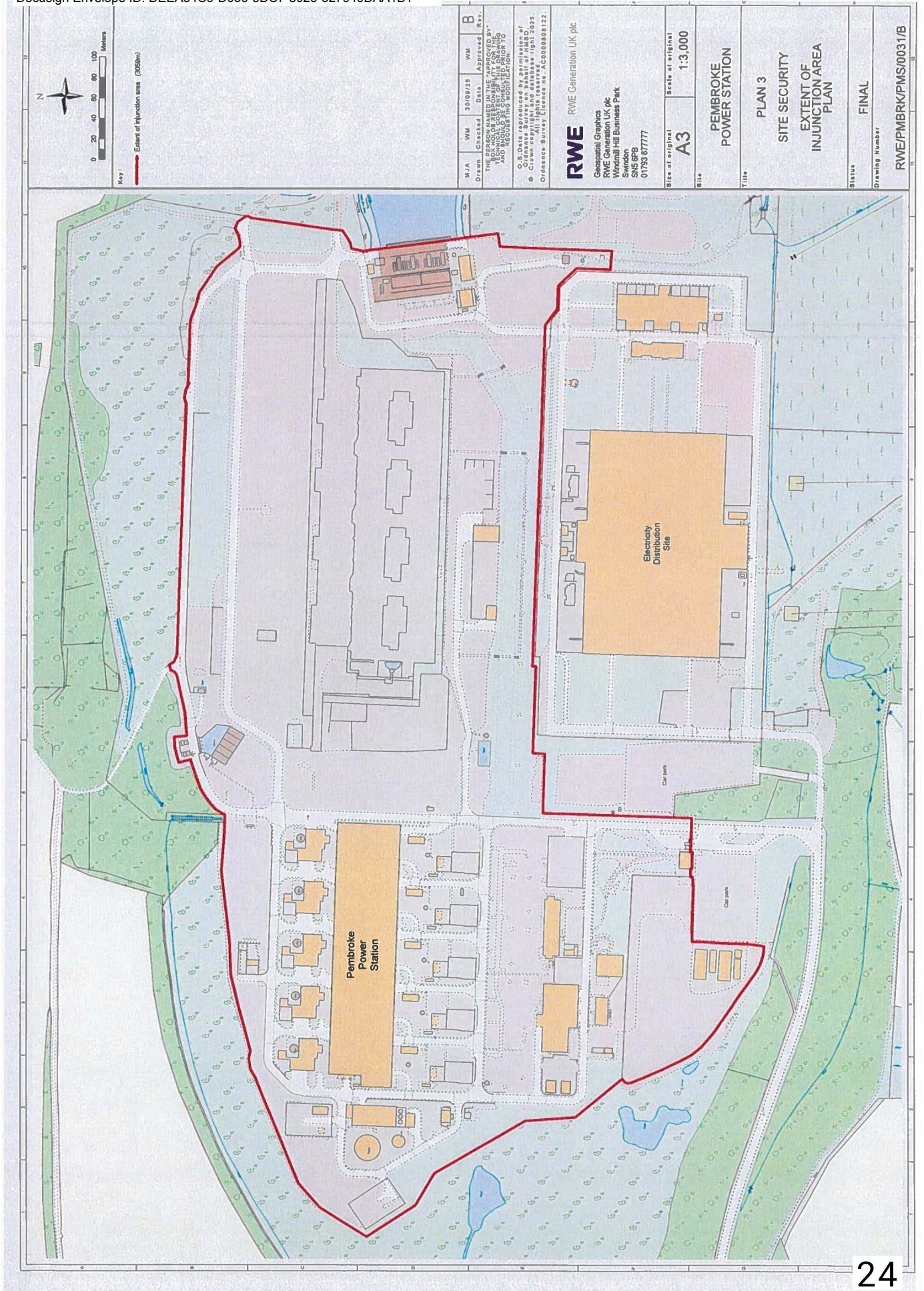
Dated: 24 Oct 2025

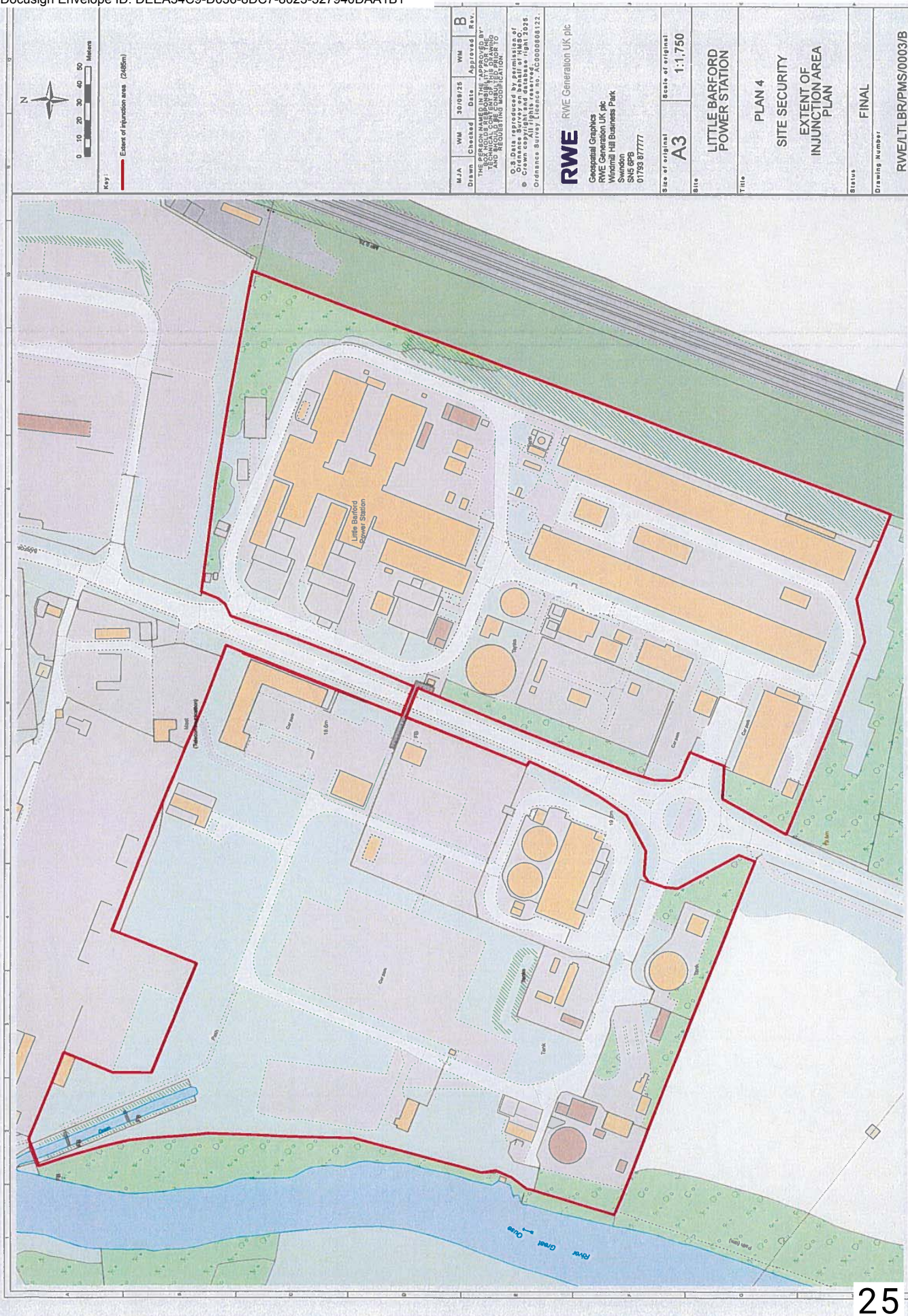
Judge: Helen Ginn

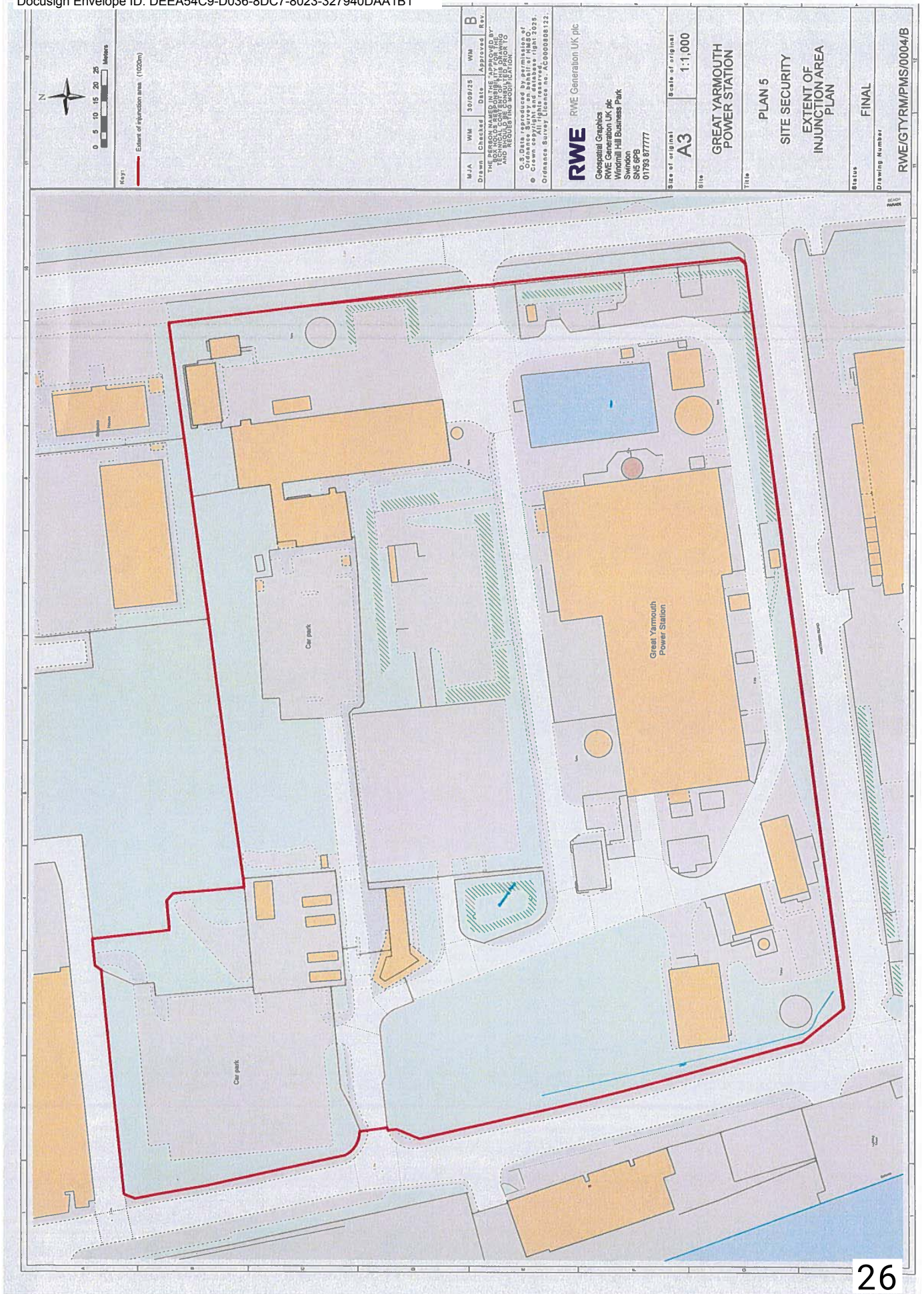
SCHEDULE 1: PLANS 1-6

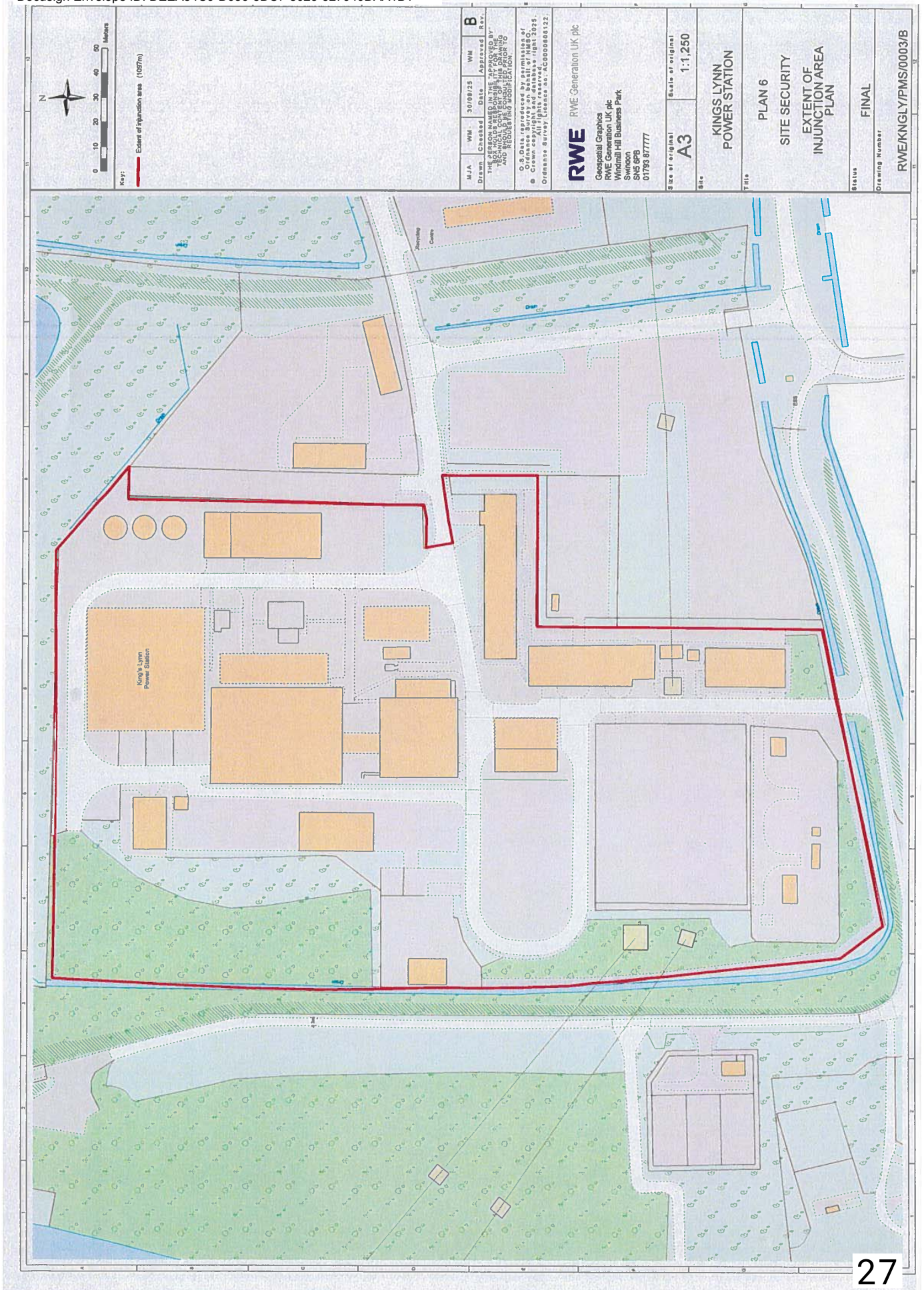














Oil and gas | Article

We won! The Great Gas Rip Off is finally ending



Greenpeace UK
May 12, 2026

For too long, our energy bills have followed an unfair rule: the high and volatile cost of gas has dictated the price of our electricity, even if that electricity came from much cheaper renewables.

Last week, the government finally listened to our calls for change. They announced a new policy to start delinking gas and electricity prices.

This is a massive win for everyone who uses electricity. It means that when fossil fuel prices spike, like we're seeing right now with the conflict in Iran, your electricity bills won't automatically

28

skyrocket along with them. We've started to break the chains that bind our wallets to global gas markets.

How we did it: People power vs. Big Gas

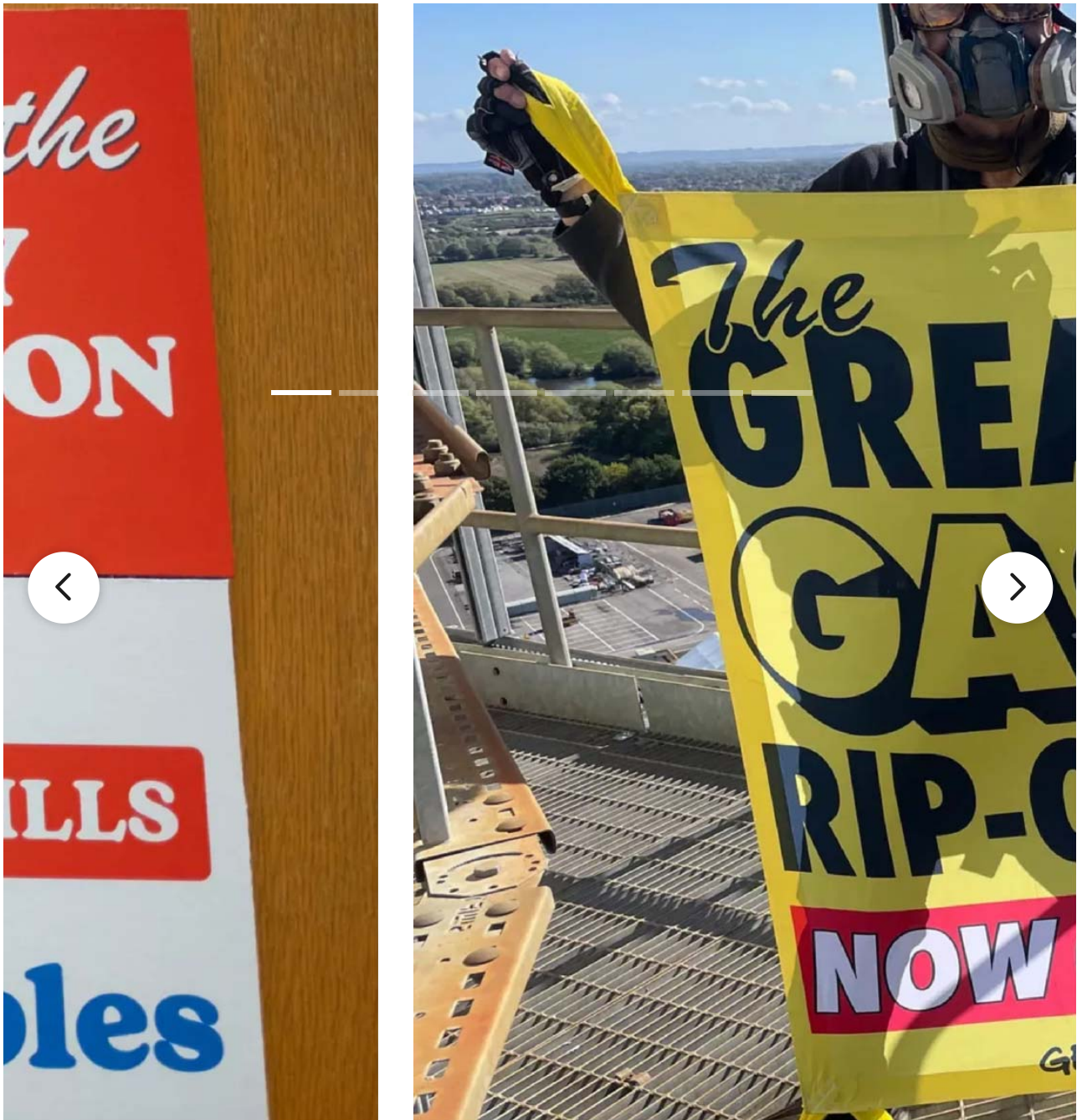
This victory was built by tens of thousands of us who refused to accept the Great Gas Rip Off.

While energy executives have been making huge sums and profiting off wars, we have been taking action together. Over **60,000 people signed the petition**, sending a clear message to Westminster. Greenpeace volunteers all over the country took the fight to the heart of their communities by:

- Handing out 5,000 beer mats explaining how gas is responsible for the high price of electricity in pubs and chatting with pub landlords
- Chatting with the local community on stalls
- Plastering posters and bus stop ads across the country to make sure MPs couldn't look the other way.

From a huge protest at the Staythorpe Gas Power Station to political conversations in the halls of the Labour Party conference, we made sure the message was everywhere.

Our public campaigning was supported by our report, Power Shift. This report explained the problem and set out our proposed solution. It gave the government and supportive MPs the facts they needed to champion our cause and solve the issue.



Greenpeace UK climbers scale two 75m-high chimney stacks at the UK's
© Greenpeace

What exactly changed?

In the UK, the most expensive power source sets the price for all electricity. Most of the time, that expensive source is gas. This means even when the vast majority of our electricity comes from

cheap renewable energy, even a tiny top-up of gas can make the whole bill expensive. As we move away from fossil fuels and expand renewables, this old system has kept our prices unfairly high.

Many new renewable projects sit outside of this complicated pricing system – years ago, the government started giving new renewable projects ‘set prices’ for their energy so they wouldn’t be affected by fluctuating fossil fuel prices. Now, they are moving older renewable and nuclear plants into this same system. This means that more electricity than ever is capped at set prices, meaning less of the electricity we need to meet demand will be affected by high and volatile gas prices.

Is it perfect? Not yet.



The good

It creates a shield against future price shocks.

It makes our energy system more stable.



The not-so-good

The government took the path of least resistance. This policy will most likely stabilise bills to shield us from future shocks rather than lowering them immediately.

It will also allow gas companies to continue charging what they like for their electricity and pull in huge profits.

What now?

We've shown that the government will move if we push hard enough. Now, let's keep the pressure on to ensure the future of UK energy is 100% renewable and 100% affordable.

Take the next step

Sign our petition to tell the UK government to lead the renewable revolution. It's time to double down on renewable energy, invest in the grid and upgrade our homes.

Your first name (Required)

Your last name (Required)

Your email address (Required)

Your postcode

Your phone

Do you want us to keep you posted? (Required)

Subscribe to our emails to receive updates on how to get involved through petitions, campaigning, volunteering and donating.

- ☐ Yes
- ☐ No

Submit

You don't have to leave your phone number, but if you do, we'll use this to keep you updated on how you can get involved through petitions, campaigning, volunteering and donating. You can opt out at any time. We take the security of your data seriously. Your information is safe and secure with us – read our privacy policy

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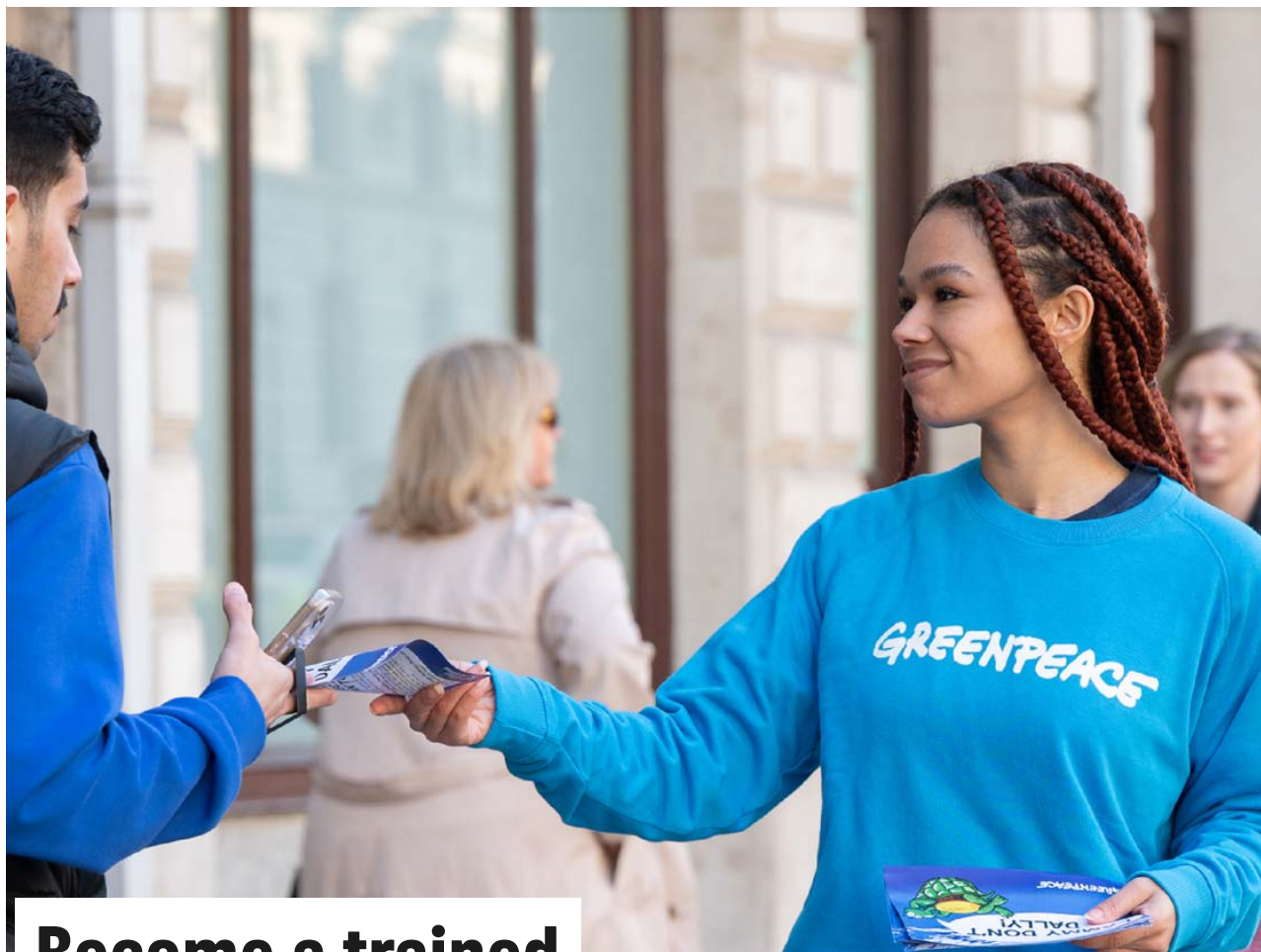
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Become a trained Greenpeace activist

Join Greenpeace's peaceful protests and direct actions. Activists are at the heart of Greenpeace's world-changing campaigns, and there are different roles to suit your skills and situation.

The next training will take place on **Saturday 26th** and **Sunday 27th September**. To be considered for this training please apply by **Monday 7th September – 9am**.

[Apply for the next training](#)

What do Greenpeace activists do?

Greenpeace activists peacefully expose, confront or disrupt environmental injustice.

They often directly target the companies or government bodies responsible for the damage. They use creative tactics to disrupt their operations and draw public attention to what they're doing.

These kinds of protests are known as non-violent direct actions (or just 'actions').

See some examples >

Five things to know about being an activist

1. Activism is a powerful, proven way to **change the world**. Many of the freedoms we enjoy today were won through peaceful protest.
2. Greenpeace actions are **carefully planned**, and activists work as a team to carry out the plan.
3. Taking action can be **tiring and emotionally intense**, with lots of highs and lows.
4. Activists come from **all walks of life**, and many cultures have proud activist traditions.
5. You may need to defend your actions legally, and **we will support you**.



“I always feel a sense of community and camaraderie when we assemble together and prep for actions – it feels like a family get together!”

Patti, Greenpeace activist

Who can be an activist?

You don't need to have special skills to be an activist. You also don't need to be unusually brave or physically strong. However you do need to be:



Over 18 and living in the UK



Available for action a few times a year

Including on weekdays.



Committed to the idea of nonviolent protest.



Reliably calm and composed in high-pressure, sometimes hostile situations.



Happy to work as part of a team and follow an agreed plan.



Able to recognise and manage feelings like stress and anxiety in a constructive way.



Committed to preserving the secrecy of an upcoming action, even from the people closest to you.



Up for defending your actions legally if proceedings are brought against you.

Greenpeace covers your expenses for each action you're involved in, including travel and childcare.

Is activism safe?

Although activism does involve some calculated risks, the safety and welfare of activists is always our top priority. Here's what you can expect:

Careful planning with experienced teams



Proper training



An informed decision, every time.



A round-the-clock welfare team



A welcoming and inclusive community



Fully funded legal support



A go-to person for info and advice



“The planning, preparation and support from Greenpeace are second to none and I always feel valued and safe.”

Richard, Greenpeace activist

About Greenpeace activist training

Training happens over a weekend at Greenpeace’s office in London. Here’s how it works and what to expect.

What you'll learn

Background

The history of non-violent direct action, and why it matters today.

How Greenpeace works, and how we fit into the wider movement.

Practical skills

Non-violence and dealing with stressful situations.

Learn about your legal right to protest, possible charges and defences.

How to hide in plain sight.

Being an activist

How to join a Greenpeace action, and how we take your feedback on board.

Anti-oppression, collective care, and joining Greenpeace's activist community.



© Suzanne Plunkett / Greenpeace



© Luca Marino / Greenpeace

Open to everyone

We're committed to help with any practical or financial barriers that might stop you being able to join us.

We'll cover your travel expenses to and from the training. There'll be free food and basic overnight accommodation.

Wherever possible, we'll accommodate your access needs. Our offices have:

- Level access from the street, with automatic doors into the building.
- An accessible bathroom with automatic doors and a DOC M shower setup.
- An elevator with door safety sensors and a mirrored back.

We can also cover childcare costs, hire BSL interpreters, cater for your dietary needs and lots more. Just tell us what you need when you complete your application form.

If you have any questions or worries about accessing the training, our activist development team are here to help. Email actuk@greenpeace.org to get a quick answer or organise a chat.



© Dan Hatch / Greenpeace



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What to expect

The two-day training will be a mix of theory and practice. You'll learn from practical exercises, group discussion, action role-play and regular presentations.

- Sessions will be led by our volunteer trainers and Greenpeace staff.
- There'll be about 35 participants in total.
- You'll need to bring an overnight bag including a towel, and warm clothes that you don't mind getting dirty. You don't need any special equipment for the training.
- We'll ask you to keep your phone stored away during the training, but you'll still be able to access it if you need it.
- Food will be provided and there'll be plenty of breaks through the day. Snacks and drinks will be available throughout.
- There'll be some social time to get to know your fellow participants and the Greenpeace actions team.
- There'll be no pressure or obligation to sign up as an activist if you decide it isn't right for you.

Although you won't be tested or formally assessed as part of the training, we do occasionally say no to people we feel aren't ready to be a Greenpeace activist.



© Greenpeace



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After the training

You'll be asked for feedback on the training afterwards. You'll then have some time to consider whether being a Greenpeace activist is right for you. You can also have a followup call with our activist development team to discuss it if needed.

If you do decide to go ahead, you'll be invited to join our activists network, and be connected with an experienced activist who will invite you to your first action.



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Apply for the next training session

The next training will take place on Saturday 26th and Sunday 27th September.

To be considered for this training, please apply by Monday 7th September – 9am.

If you have any questions or concerns about applying, email actuk@greenpeace.org to get a quick answer or organise a chat.

First name

Last name

How should we refer to you?

Eg she, he, they

Email (Required)

Where in the UK do you live?

Choose your region

Do you identify as working class or a person of colour?

We encourage and prioritise applications from these groups because they're currently under-represented in Greenpeace's activist network. Choose all that apply.

- ☐ Working class
- ☐ Person of colour

Why do you want to be a trained Greenpeace activist? (Required)

You might want to talk about how activism fits with your personal values, what draws you to Greenpeace in particular, and what's inspired you to apply now.

0 of 1500 max characters

Why do you think non-violence is an important principle for Greenpeace activists? How would you practise this in your activism? (Required)

0 of 1500 max characters

What do you think makes a community truly welcoming and inclusive? What would you do to help make the Greenpeace activist network more welcoming for others, even when it might feel uncomfortable or take extra effort? (Required)

We believe that diversity makes us stronger. We want our people, volunteers and communities to feel welcome and included. This question is your chance to tell us what that means to you. Feel free to include a story or example that helps explain your thoughts.

0 of 1500 max characters

What might be the implications of taking action for you personally? How does that make you feel? (Required)

We need to see that you've considered the physical, emotional and legal risks involved. You don't need to share detailed personal information here. Just a general overview is fine.

0 of 1500 max characters

Tell us about your accessibility needs, or any concerns you have about taking part (optional)

Many of us have different things we need that help us feel more able to participate. Please detail these and any concerns below, so we can ensure the session is as accessible as possible.

0 of 5000 max characters

Please confirm that you're eligible to apply

You need to meet all of the criteria below to submit an application.

- ☐ I am over 18
- ☐ I live in the UK
- ☐ I'm committed to the nonviolence in my activism

How did you find out about this opportunity?

- ☐ Word of mouth
- ☐ Web search
- ☐ Social media
- ☐ Greenpeace volunteer network
- ☐ University / college / apprenticeship
- ☐ Another activist group
- ☐ Other

Other

Your privacy

Greenpeace UK will use the data you give us to process your application and contact you about its status and next steps. To find out more, please read our [privacy policy](#).

Submit

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Although activism does involve some calculated risks, the safety and welfare of activists is always our top priority. Here's what you can expect:

Careful planning with experienced teams

Every action is carefully risk-assessed. We draw on decades of combined experience planning actions, and we factor in the current political, public and legal climate. We can (and do) stop actions if they're putting anyone in unreasonable danger.

Proper training

Every activist is thoroughly safety trained. Training includes everything from the safe use of equipment like ladders and locks, to de-escalation and managing stress.

An Informed decision, every time.

You'll get a detailed briefing before every action, including the rationale for what you're doing, the legal implications for your role, and any other risks involved.

A round-the-clock welfare team

Our welfare volunteers will be there to support you during and after an action. From helping you get legal advice to giving you a lift home from the police station, they've got you covered.

A welcoming and inclusive community

You'll be part of a friendly, well-organised activist network where everyone is welcome. We actively seek feedback, and create space to ask for info and support. If you have particular access needs, we'll ensure these are covered wherever possible.

Fully funded legal support

If you have to defend your actions legally, you'll get professional legal representation and support from specialist solicitors tailored to your circumstances – all paid for by Greenpeace. We also cover any costs you incur as part of the action, and provide pastoral care until your case is resolved.

A go-to person for info and advice

After your training, you'll be connected to an experienced activist who will keep you informed of upcoming actions and able to help you prepare for them.



"The planning, preparation and support from Greenpeace are second to none and I always feel valued and safe."

Richard, Greenpeace activist

We need to see that you've considered the physical, emotional and legal risks involved. You don't need to share detailed personal information here. Just a general overview is fine.

0 of 1500 max characters



PRESSEMITTEILUNG — 28. APRIL 2026 10:00 Teilen

Zukunft statt Gas: Klimabündnis ruft zu Demonstration in Hamm auf

Gemeinsame Pressemitteilung von BUND, Campact, Fridays For Future und Greenpeace

Teilnehmende wollen weltgrößtes Windrad-Menschenbild bilden

Berlin, 28. 4. 26 - Unter dem Motto „Zukunft statt Gas – Gemeinsam für die Energiewende“ ruft ein deutschlandweites Bündnis für Samstag, den 30. Mai, in Hamm zu einer Demonstration für eine gerechte Energiewende und gegen den Neubau von Gaskraftwerken auf. Der Protest richtet sich gegen die Energiepolitik von Wirtschaftsministerin Katherina Reiche (CDU). Die Demonstration wird initiiert von Campact, Fridays for Future, BUND und Greenpeace. Zahlreiche weitere Organisationen unterstützen den Aufruf.

Die Demonstration startet um 12 Uhr und führt in Richtung Gersteinwerk, wo RWE einen großen zusätzlichen Gaskraftwerksblock plant. Startpunkt und Route sind noch offen. Vor dem Kraftwerk ist zum Abschluss der Demonstration ein Mitmach-Weltrekordversuch geplant: Mehr als tausend Teilnehmende stellen sich zum größten menschlichen Windrad der Welt auf.

In keiner Region sind derzeit mehr Gaskraftwerke geplant als im Ruhrgebiet –
Direkt zum Inhalt springen
allein rund um Hamm sind es drei. Und das ist erst der Anfang: Lobbyministerin

Katherina Reiche will die Erneuerbaren Energien ausbremsen und Milliarden in klimaschädliche Gaskraftwerke stecken. Von den Plänen profitieren vor allem RWE und Co., deren Wünsche Reiche in Gesetze gießt. Gegen diese fossile Politik und für die Energiewende gehen wir gemeinsam auf die Straße“, sagt Verena Graichen, Geschäftsführerin Politik des BUND.

„Der Irankrieg führt einmal mehr vor Augen: Nur erneuerbare Energien machen uns unabhängig von autoritären Regimen. Sonne und Wind müssen nicht durch die Straße von Hormus, sie sind günstig und schützen das Klima. Doch Gasministerin Katherina Reiche greift die Energiewende an, fördert Öl- und Gasheizungen und lenkt Milliarden in zusätzliche Gaskraftwerke. Schluss mit dem Gas-Wahn, Schluss mit fossiler Abhängigkeit!“, fordert Mira Jäger, Energieexpertin von Greenpeace.

„In den letzten Wochen haben wir überall im Land gegen den fatalen energiepolitischen Kurs der Bundesregierung protestiert, und der Zuspruch war riesig. Jetzt ist es Zeit, als geeinte Klimabewegung für die Energiewende und Klimagerechtigkeit auf die Straße zu gehen: Alle zusammen nach Hamm!“, so Linda Kastrup, Sprecherin von Fridays for Future Deutschland.

Christoph Bautz, geschäftsführender Vorstand von Campact: „Die Klimabewegung ist zurück – und sie wächst. Mit ihrer rückwärtsgewandten Energiepolitik treibt Ministerin Reiche die Menschen zunehmend auf die Straße. Vor zehn Tagen demonstrierten über 80.000 in vier Großstädten. Jetzt kommen Tausende nach Hamm – genau dorthin, wo die Energiewende mit viel zu viel Strom aus Gaskraftwerken ausgebremst werden soll. Unser Protest ist unübersehbar: Vor den Kraftwerkstürmen formen wir das größte menschliche Windrad der Welt. Unsere Botschaft ist klar: Finger weg von den Erneuerbaren!“

Der geplante Ausbau von Gaskraftwerken sorgt für eine Welle von Protesten in der Region. In Hamm wird vom 27. bis 31. Mai auch das von ehrenamtlichen

[Direkt zum Inhalt springen](#) anisierte Hammer Klimacamp stattfinden.

Bitte entschuldigen Sie mögliche Doppelzusendungen durch sich überschneidende Verteiler.

Themen

Umwelt, Energie Politik Demonstrationen

Kategorien

Energiewende Klimakrise

Regionen

Nordrhein-Westfalen

Pressekontakte:

Campact: Pressesprecherin Maria Henk, presse@campact.de oder 0173
2518013

Fridays for Future Pressekoordination: pressteam@fridaysforfuture.de oder
030 20004360

BUND-Pressestelle: presse@bund.net oder 030-27586109

Greenpeace: Pressesprecher Michael Weiland,
michael.weiland@greenpeace.org oder 01601745772

Kontakt



Michael Weiland

Pressesprecher Klimakrise, Energiewende

[Direkt zum Inhalt springen](#)

michael.weiland@greenpeace.org

0160-1745772

Greenpeace

Greenpeace arbeitet international, setzt sich mit direkten, gewaltfreien Aktionen für den Schutz der natürlichen Lebensgrundlagen von Mensch und Natur und Gerechtigkeit für alle Lebewesen ein.

Unser Ziel ist es, Umweltzerstörung zu verhindern, Verhaltensweisen zu ändern und Lösungen durchzusetzen. Greenpeace ist überparteilich und völlig unabhängig von

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GREENPEACE

Greenpeace e.V.

Hongkongstraße 10

20457 Hamburg

Deutschland

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Einloggen



PRESS RELEASE — APRIL 28, 2026 10:00 AM [Share](#)

Future instead of gas: Climate Alliance calls for demonstration in Hamm

Joint press release by BUND, Campact, Fridays For Future and Greenpeace

Participants want to form the world's largest wind turbine image of humanity

Berlin, 28.4.26 - Under the motto "Future instead of gas - Together for the energy transition", a Germany-wide alliance is calling for a demonstration for a just energy transition and against the construction of new gas-fired power plants in Hamm on Saturday, 30 May. The protest is directed against the energy policy of Economics Minister Katherina Reiche (CDU). The demonstration is initiated by Campact, Fridays for Future, BUND and Greenpeace. Numerous other organizations support the call.

The demonstration starts at 12 noon and leads in the direction of the Gersteinwerk, where RWE is planning a large additional gas-fired power plant block. The starting point and route are still open. At the end of the demonstration, a hands-on world record attempt is planned in front of the power plant: More than a thousand participants will line up for the largest human wind turbine in the world.

"In no region are more gas-fired power plants currently planned than in the Ruhr area - there are three around Hamm alone. And this is just the beginning: Lobby Minister Katherina Reiche wants to slow down renewable energies and invest billions in climate-damaging gas-fired power plants. RWE and Co. in particular benefit from the plans, whose wishes Reiche pours into laws. We are taking to the streets together against this fossil fuel policy and for the energy transition," says Verena Graichen, Managing Director of Politics at BUND.

"The Iran war shows once again that only renewable energies will make us independent of authoritarian regimes. Sun and wind do not have to pass through the Strait of Hormuz, they are cheap and protect the climate. But Gas Minister Katherina Reiche is attacking the energy transition, promoting oil and gas heating systems and directing billions into additional gas-fired power plants. No more gas mania, no more fossil dependency!" demands Mira Jäger, energy expert at Greenpeace.

"In recent weeks, we have protested all over the country against the fatal energy policy course of the federal government, and the response has been huge. Now it's time to take to the streets as a united climate movement for the energy transition and climate justice: All together to Hamm!", says Linda Kastrup, spokesperson for Fridays for Future Germany.

Christoph Bautz, Managing Director of Campact: "The climate movement is back – and it is growing. With her backward-looking energy policy, Minister Reiche is increasingly driving people onto the streets. Ten days ago, more than 80,000 demonstrated in four major cities. Now thousands are coming to Hamm – exactly where the energy transition is to be slowed down with far too much electricity from gas-fired power plants. Our protest is unmistakable: In front of the power plant towers, we are forming the largest human wind turbine in the world. Our message is clear: Hands off renewables!"

The planned expansion of gas-fired power plants is causing a wave of protests in the region. The Hammer Climate Camp, organized by volunteer activists, will also take place in Hamm from May 27 to 31.

Please excuse possible duplicate mailings due to overlapping mailing lists.

Topics

Environment, Energy Politics Demonstrations

Categories

Energy Transition Climate Crisis

Regions

North Rhine-Westphalia

Press contacts:

Campact: Press Spokesperson Maria Henk, presse@campact.de or 0173
2518013

Fridays for Future Press Coordination: pressteam@fridaysforfuture.de or 030
20004360

BUND Press Office: presse@bund.net or 030-27586109

Greenpeace: Press Spokesman Michael Weiland,
michael.weiland@greenpeace.org or 01601745772

Show more

Contact Now



Michael Weiland

Press Spokesperson Climate Crisis, Energy Transition

michael.weiland@greenpeace.org

0160-1745772

Greenpeace

Greenpeace works internationally, with direct, non-violent actions for the protection of the natural foundations of life of humans and nature and justice for all living beings.

Our goal is to prevent environmental destruction, change behaviors and enforce solutions. Greenpeace is non-partisan and completely independent of politics and

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20457 Hamburg

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Environmental groups stage protests against German govt's gas power station plans

#Society #Gas

Westfälischer Anzeiger / Rheinische Post / Clean Energy Wire

Environmental activist groups [have called for staging protests](#) throughout this week against the German economy ministry's commitment to build more gas power stations. The activist groups, including Greenpeace and Fridays for Future, argue against the planned expansion of gas-fired power production, and call instead for a more rapid roll-out of renewables.

The demonstration in the western city of Hamm, in which between 1,500 and 2,000 protesters are [expected](#) to take part, include a "climate camp" and





authoritarian regimes," said Mira Jäger, energy spokesperson for Greenpeace. "Sun and wind don't have to pass through the Strait of Hormuz; they are affordable and protect the climate," Jäger said, adding that Germany's energy minister Katherina Reiche is "attacking the energy transition" by allowing the continued use of oil and gas heating systems and prioritising fossil gas in her plans for backup capacity for the country's electricity system.

[A recent report](#) commissioned by Greenpeace also said that a more secure supply of energy can be achieved by flexibility measures and improved demand management, rather than by building additional gas power facilities.

The gas power plants that are meant to stabilise the grid during times of little output by wind and solar power installations [were initially planned under Reiche's predecessor](#) in the previous government, Robert Habeck from the Green Party. Reiche had sought to significantly increase the capacity planned under Habeck and [ease requirements for making the installations climate-neutral](#) in the future by using green hydrogen. The European Commission [ultimately rejected the 20 gigawatts](#) (GW) of new plant capacity planned by Reiche, and said the additional capacity cannot exceed 12 GW under EU state aid rules.

Swedish climate activist Greta Thunberg, founder of the Fridays for Future climate protest movement, had joined the protesters in Hamm. "It is important that we highlight Germany's responsibility in the climate crisis," Thunberg [told Westfälischer Anzeiger](#). "For a long time, fossil fuel



In Germany, similar climate protests in the past have played an influential role in the public debate, for example [in the context of Germany's coal exit](#). [The Fridays for Future](#) youth movement, which mobilised up to 1.4 million people in Germany alone at its peak in 2019, played a crucial role in advancing the country's debate on climate action, and pushing parties across the political spectrum to commit to policy in line with limiting global warming to 1.5 degrees Celsius. However, the student-led climate protests were disrupted by the coronavirus pandemic and have struggled since to regain their initial follower numbers.

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13 May
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Sabotage suspect held in Germany after spate of attacks on power grid



Amy Walker

8 September 2026

A 48-year-old man has been arrested on suspicion of carrying out a spate of sabotage attacks on Germany's electricity grid after spending several days on the run.

The suspect was carrying explosives when he was detained near the Weisweiler power plant in western Germany on Tuesday, police in Cologne said.

A tent in nearby undergrowth was also found to be rigged with further explosives, they added.

The suspect, named by German media as Daniel V, is believed to have written letters claiming responsibility for the attacks, which have taken place in Brandenburg and Saxony in the east as well North Rhine-Westphalia in the west.

Police said explosives found during the arrest were being examined by a bomb disposal expert, while officers were checking to see if any undiscovered devices had been set up in the surrounding area.

Prior to the suspect's arrest on Tuesday, police said they had found several launch devices on high-voltage lines near the Weisweiler plant on Monday afternoon, alongside "another confession letter".

A series of incidents across the grid in the last week have followed a similar pattern, with rockets used to shoot wires across high-voltage cables in order to cause short circuits.



Pictures of the suspect were released by police to German media outlets while he was on the run

The attacks have led to power-generating units at some plants being temporarily taken off the grid.

A statement from the Cologne Public Prosecutor's Office and Cologne Police on Tuesday did not provide further details on the suspect, or on the number

and whereabouts of incidents he has been linked to.

German media have previously reported receiving two letters from the suspect claiming responsibility for the attacks. The Frankfurter Allgemeine Zeitung said the handwritten letters contained information that had not yet been made public.

The letters were apparently signed with the first name Daniel, while his surname was kept anonymous, in line with German privacy rules. The letters also gave a residential address in the town of Gevelsberg.

Cologne Police had previously said it was searching for a 48-year-old suspect from the town in connection with the sabotage of electrical substations in three German states. Investigators had also said explosives were found during a search of the suspect's apartment.

In Saxony alone, police found 21 devices near high-voltage power lines last Friday and Saturday.

Interior Minister Armin Schuster has admitted it could have led to a regional blackout, but he has warned against jumping to conclusions.

"The way this deed was committed makes this case unusual, as well as the manner of the confession," he said.

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British grid operator cancels plea for more power as temperatures soar

The National Energy System Operator had asked for more power as red heat health alerts came into force.



James Sillars

Business and economics reporter @SkyNewsBiz

 Wednesday 24 June 2026 17:22, UK



File pic: Coldsnowstorm/iStock



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The body which oversees Britain's energy network has walked back a call for more power generation.

The National Energy System Operator (NESO) had last night issued a so-called electricity margin notice (EMN) for Wednesday evening as **red heat health alerts** came into force across large parts of England and Wales.

The public body later confirmed it was the first time it had exercised such a plea in the summer months.

But by Wednesday afternoon, NESO had cancelled the call. They did not give a reason why.

An EMN is essentially an operational alert to call for more power to be made available as the buffer between supply and expected demand comes under pressure.

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Before cancelling the call, a NESO spokesperson said: "Our forecasts are showing tight margins on the electricity system for tomorrow evening [Wednesday].

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"This is due to the impact of extremely high temperatures affecting Great Britain and the continent and low wind."

But the spokesperson added it "does not mean electricity supply is at risk".

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There is high demand for power during spells of very hot weather as fans and air conditioning units are switched on across the country in a bid to keep cool.

Calls for people not to travel on public transport and work from home in the areas covered by the red heat alerts only add to the drain.

In addition to the UK's wind generation capabilities being harmed by the high-pressure "heat dome" weather system, power transfers from the

continent via interconnectors are also being squeezed due to the widespread high temperatures, strong demand and disruptions to supplies in northern France.



Europe on high alert as record-breaking heatwave hits

France is still expecting highs above 40C after a new record of 44.3C was provisionally set earlier in the week.

National Grid data showed natural gas accounting for a majority of UK power production on Wednesday morning.

Wind generation stood at just 12.6% of the mix, while solar made up 6.3% of supply.

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The cost of electricity is also up, mainly due to gas playing a leading role at a time when prices are higher than summer norms due to the effects of the US-Iran war on the global energy market.

The price per megawatt hour surged beyond £550 on Tuesday evening as football fans gathered to watch England's latest World Cup match.

Data showed the cost averaging £182 for the day as a whole - still way above a typical summer day and the yearly average £81.



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The issue of an EMN is more common in winter time, again during periods of high pressure but which tend to bring colder conditions along with light winds.

Earlier on Tuesday, NESO said electricity supplies across Britain would "remain secure" in its **early report** covering the coming winter, despite the challenges posed by the Iran war.

Gas supplies, in particular, have been harmed by the effective closure of the Strait of Hormuz waterway since early March.

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Latest margin notice 'reinforces need to plan for conditions outside winter' - Utility Week

Latest margin notice 'reinforces need to plan for conditions outside winter'



Bob Hakimi
Published 28 September 2026

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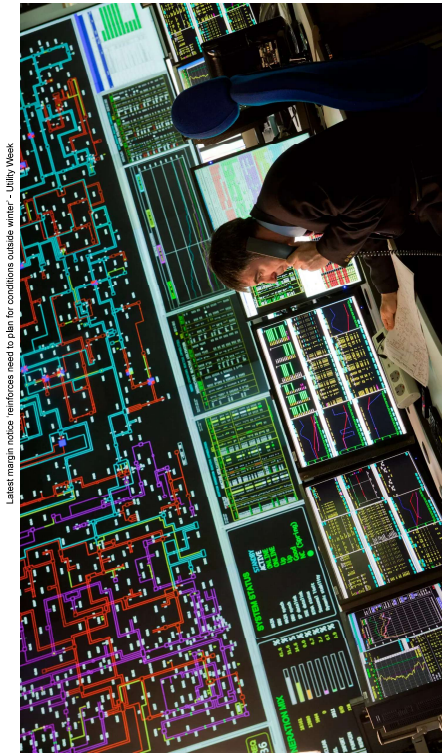
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Latest margin notice reinforces need to plan for conditions outside winter - Utility Week

The latest Electricity Margin Notice (EMN) issued by the National Energy System Operator (NESO) "reinforces the need to plan for conditions outside the winter peak".

This is according to University of Manchester Chair in net zero infrastructure Professor Aoife Foley, who was speaking to *Utility Week* about the EMN issued at 11.30pm on Sunday (27 September) regarding a 1,400MW shortfall anticipated between 4pm and 7pm on Monday (28 September).

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Latest margin notice 'reinforces need to plan for conditions outside winter' - Utility Week

NESO's notice identified 1,900MW of excluded generation as a cause of the shortfall. Contributions to this include low wind, the refuelling of Heysham nuclear power plant and an extension to the outage of two units of Dinorwig pumped hydro power station in Wales.

Utility Week also understands that there are unplanned network outages that have contributed to the shortfall. The National Audit Office's recent report on upgrading the transmission network highlighted that there are thousands of planned outages annually for system access, and more outages will be needed going to upgrade the transmission network, but these can frequently overrun or be rearranged, adding strain to the network.

At the 12pm update on Monday the anticipated shortfall had fallen to 104MW and by 3pm, one hour before the window in question, the EMN was cancelled. NESO said it had secured additional generation, while there was also a reduction in the contingency electricity that it must hold and in the generation that was to be constrained in the EMN window.

Reacting to the unusual timing of the EMN, during the so-called "shoulder months" that fall outside of winter and summer demand, Foley said: "These notices reinforce the need to plan for conditions outside the winter peak, although a few examples do not establish a trend."

Nevertheless, she reinforced that there is a necessity to better plan the network to withstand different pressures. Aside from generation availability, she also highlighted potential voltage control issues.

"When demand on the transmission network is low, operators may need additional measures to prevent voltage rising too high," she said. "During an evening margin shortfall, they need enough usable supply or demand reduction to restore the required buffer."

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She said that potential generation and voltage issues "reinforce the importance of planning generation, networks, storage and demand together, rather than judging security by installed generation alone".

She continued: "We should assess network reinforcement alongside better use of generation, storage and flexible demand

What are Capacity Market Notices in the UK energy system?

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at the locations where they can help, with better coordination of maintenance."

Foley suggested that "industrial cooling, hot-water storage and water pumping should be assessed for safely shifting their operating times" and she advocated for "rewarding industrial flexibility where it is genuinely available and compatible with production requirements".

"The market should reward a response that is available when and where it is needed," she continued. "We still need investment in generation and networks, but more generating capacity or more wires, considered separately, will not necessarily provide that response. The objective should be a reliable, affordable energy system that makes proper use of all the technology and tools available."

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5/14

On behalf of: Claimant
Witness: Donal Patrick Kelly
No. of witness statement: 2
Exhibit(s): DPK2
Date made: 1 October 2026

Claim No. PT-2025-001017

IN THE HIGH COURT OF JUSTICE

BUSINESS AND PROPERTY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE Generation UK PLC

Claimant

And

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WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM,
FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY
GREENPEACE CAMPAIGN OR OTHERWISE**

(2) Greenpeace UK Limited

(3) Greenpeace Limited

Defendants

SECOND WITNESS STATEMENT OF DONAL PATRICK KELLY

I, Donal Patrick Kelly of Osborne Clarke LLP, of One London Wall, London EC2Y 5EB,
state as follows:

1. I am a solicitor of the Senior Courts of England and Wales and, subject to supervision, I have the care and conduct of this matter on behalf of the Claimant.

2. I make this statement on behalf of the Claimant. I am duly authorised to do so.
3. Unless stated to the contrary, the facts set out in this statement are within my own knowledge and from information provided to me by others. Where facts are within my knowledge, I confirm that they are true. Where the facts were supplied by others, or are derived from documents, this is indicated and I confirm that they are true to the best of my knowledge, information and belief.
4. A list of documents is set out at the beginning of a paginated bundle of documents marked Exhibit **"DPK2"**. This list identifies the documents to which I refer or which have been referred to me for the purposes of providing evidence in this witness statement. The documents themselves are true copies of the documents to which I shall refer in this witness statement. References in this witness statement to page numbers in Exhibit **"DPK2"** are in the format **"[DPK2/page(s)]"**.
5. This is my second witness statement in these proceedings. I make it in support of the Claimant's position at the first annual review hearing of the Order (defined below), listed to be heard in the three-day window of 19 to 21 October 2026.
6. At the return date hearing before the Honourable Mr Justice Trower on 24 October 2025, following the Claimant's application for an ex parte interim injunction by Application Notice dated 1 October 2025 and interim injunctive relief having been granted at an ex parte hearing by the Honourable Mr Justice Rajah on 3 October 2025, the Court made an order (the **"Order"**). The Second Defendant (Greenpeace UK Limited) and the Third Defendant (Greenpeace Limited, which was joined to these proceedings for the purpose of giving undertakings) agreed terms including undertakings to the Court on 24 October 2025, which were accepted by the Court and are annexed to the Order at Schedule 4 (the **"Undertakings"**).
7. The injunction set out at paragraphs 1 and 2 of the Order at paragraph prohibits the First Defendant from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises shown edged red on Plans 1 to 6 to the Order, being: (i) Staythorpe Power Station, Staythorpe, Newark, NG23 5RQ; (ii) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU; (iii) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS; (iv) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT; (v) Great Yarmouth Power Station, South Denes

Road, Great Yarmouth, NR30 3PY; and (vi) Kings Lynn Power Station, Kings Lynn, PE34 3RD (together, the "**Sites**").

8. I do not seek to repeat the matters set out in my first witness statement or in the first witness statements of Rachel Jane Smith and William Henry Jeffery, all of which were filed in support of the Claim. I refer to and adopt the contents of those statements as part of the evidence before the Court at this review hearing. All three statements are available at <https://uk.rwe.com/injunction>.
9. This witness statement is filed alongside the second witness statement of William Henry Jeffery, which sets out the Claimant's operational perspective on the continuing need for the Order and the ongoing risks of unlawful direct action at the Sites. I do not repeat those matters here but rely upon Mr Jeffery's evidence in that regard.
10. In this witness statement, I address the following matters:
 - 10.1 the steps taken to serve the Order on the Second and Third Defendants and to notify the First Defendant and third party landowners in accordance with the terms of the Order;
 - 10.2 the Claimant's application to list the Review Hearing and the steps taken to serve that application on the Second and Third Defendants and to notify the First Defendant and third party landowners of that application;
 - 10.3 an update concerning a leasehold title at Staythorpe Power Station; and
 - 10.4 the decision of the Crown Prosecution Service not to prosecute in relation to the Incident (defined below) and the steps taken by the Claimant in consequence thereof.

SERVICE OF THE 24 OCTOBER 2025 ORDER

11. I set out below the steps that were taken to serve the Order on the Second and Third Defendants and to notify the First Defendant following the hearing on 24 October 2025.
12. Service of the Order on the First Defendant was dispensed with pursuant to CPR 6.28 and 81.4(2)(c). Instead, the Order required notification to the First Defendant by:
 - 12.1 uploading a copy on to the website at <https://uk.rwe.com/injunction>;

- 12.2 affixing a copy of the Order in A4 size in a clear plastic envelope at prominent locations at each of the Sites; and
- 12.3 affixing warning notices of A2 size at those locations at each of the Sites, substantially in the form of the notice at Schedule 3 to the Order.
13. Pursuant to paragraph 5(i) of the Order, the Order was uploaded to <https://uk.rwe.com/injunction> on 27 October 2025. I exhibit at [DPK2/1-2] a screenshot of the Order as listed on the website, together with an email confirmation from Adriana Gasparini that the Order had been uploaded.
14. Pursuant to paragraphs 5(ii) and 5(iii) of the Order, I have been advised by David Philips of the Claimant that the process of affixing copies of the Order and warning notices in A2 size at prominent locations at each of the Sites was, in respect of each site completed on the as following dates:

Site	Date of completion of affixing
Staythorpe Power Station	17 December 2025
Didcot Power Station	27 January 2026
Pembroke Power Station	25 November 2025
Little Barford Power Station	18 November 2025
Great Yarmouth Power Station	25 December 2025
Kings Lynn Power Station	1 December 2025

15. Owing to the scale of the Sites, and the requirement to affix copies at regular intervals around each of the Sites, the process took some time to complete. David Philips has confirmed that regular perimeter inspections are carried out as part of the Claimant's operations procedures for security purposes. He has stated that any damage to the signage or documentation would be quickly identified and rectified as part of those inspections. I enclose copies of the warning notices and Order that

were affixed at each of the Sites, together with the confirmation provided by David Philips at [DPK2/3-50].

16. Pursuant to paragraphs 10 and 11 of the Order, the Order was served on the Second and Third Defendant by email to exuk@greenpeace.org and jack.robirosa@greenpeace.org. Such service was effected on 24 October 2025 at 18:38. I enclose a copy of that email at [DPK2/51].
17. A note of the hearing on 24 October 2025 was also:
 - 17.1 provided to the Second and Third Defendant by email on 29 October 2025 at 09:39. I enclose a copy of that email at [DPK2/52]; and
 - 17.2 uploaded to <https://uk.rwe.com/injunction>.

NOTIFICATION OF THE ORDER TO THE THIRD PARTY LANDOWNERS

18. Pursuant to paragraph 13 of the Order, the Claimant was required to use reasonable endeavours to notify the owners (where known) of the areas of land shown hatched blue on Plans 1A, 2A, 4A, 5A and 6A at Annexure 2 to the Particulars of Claim of the Order (the **"Third Party Landowners"**) by not later than 5pm on 31 October 2025.
19. In accordance with that obligation, the owners of the relevant areas of third party land within or adjoining the Sites were notified of the Order via first class post and special delivery, at their registered office addresses, as set out below:

Owner	Sites Occupied	Registered Office	Service Date
Eastern Power Networks Plc	Little Barford; Great Yarmouth; and Kings Lynn	Newington House, 237 Southwark Bridge Road, London, SE1 6NP	29/10/2025

National Grid Electricity Transmission Plc	Staythorpe; and Didcot.	1-3 Strand, London, WC2H 5EH	29/10/2025
National Gas Transmission Plc	Staythorpe; Didcot; and Kings Lynn	National Grid House, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA	29/10/2025

20. I enclose copies of the letters served on the respective owners at [DPK2/53-58]
21. Following the service of the Order on National Gas Transmission PLC and National Grid Electricity Transmission Plc, on 3 November 2025, Joanna Lobo, Senior Lawyer at National Grid, acknowledged receipt of the Order by email, noting its contents and confirming that she would bring them to the attention of relevant colleagues. I enclose a copy of that email at [DPK2/59-62].
22. As at the date of this witness statement, no further response has been received from National Grid Electricity Transmission PLC or National Gas Transmission PLC in respect of the Order of 24 October 2025. Following discussions with the Claimant, I understand that no responses have been received from Eastern Power Networks PLC either.

APPLICATION TO LIST THE ANNUAL REVIEW HEARING

23. In accordance with paragraph 3 of the Order, on 17 July 2026, an application was issued applying for a review hearing to be listed on or before 24 October 2026 (the **"New Application"**).
24. The New Application specified that notification should be given to the First Defendant in accordance with paragraph 6 of the Order, and that the New Application should be served on the Second and Third Defendants in accordance with paragraphs 10 and 11 of the Order.

25. On 31 July 2026, the Court issued a notice of hearing (the **"Review Hearing Notice"**) confirming that the review hearing had been listed in the three-day window of 19 to 21 October 2026 (the **"Review Hearing"**).

NOTIFICATION OF THE NEW APPLICATION AND THE REVIEW HEARING TO THE DEFENDANTS AND THIRD PARTY LANDOWNERS

26. Pursuant to paragraph 6 of the Order, notification to the First Defendant of any further applications or documents is to be effected by:
- 26.1 uploading a copy of the application on to the website at <https://uk.rwe.com/injunction>; and
- 26.2 affixing notices at or near the prominent locations at the relevant Sites, stating that the application has been made and where the application or documents can be accessed in hard copy and online.
27. In accordance with paragraph 6(i) of the Order, a copy of the New Application dated 17 July 2026 and the Review Hearing Notice were uploaded to <https://uk.rwe.com/injunction> on 27 July 2026. I exhibit at [DPK2/63-67] emails confirming this had been completed.
28. In accordance with paragraph 6(ii) of the Order, I have been advised by David Philips of the Claimant that notices were affixed at the prominent locations at each of the Sites where the Warning Notices are displayed, informing persons unknown of: the Application Notice; the Review Hearing Notice; and where the Application and all relevant documents related to the Application can be accessed. I enclose a copy of the notice and photographs provided by David Philips evidencing its placement at [DPK2/68-96]. I am advised that completion of the process of affixation of these notices and further documents at the Sites was completed as follows:

Site	Date of completion of affixing
Staythorpe Power Station	9 September 2026
Didcot Power Station	22 September 2026
Pembroke Power Station	14 September 2026

Little Barford Power Station	25 August 2026
Great Yarmouth Power Station	9 September 2026
Kings Lynn Power Station	10 September 2026

29. The Application Notice was also served on the Second and Third Defendants in accordance with paragraphs 10 and 11 of the Order, by email to exuk@greenpeace.org and jack.robiosa@greenpeace.org on 27 July 2026 at 09:28. I enclose a copy of that email at [DPK2/97-105]
30. On 30 July 2026 at 10:02 on behalf of the Second and Third Defendants, Mr Jack Robiosa emailed injunctions@osborneclarke.com confirming that the Second and Third Defendants would not be attending the Review Hearing. I enclose a copy of that email at [DPK2/106].
31. The Review Hearing Notice was served on the Second and Third Defendants by email to exuk@greenpeace.org and jack.robiosa@greenpeace.org on 10 August 2026 at 10:25. I enclose a copy of that email at [DPK2/107-109].
32. In addition, the Claimant has taken steps to notify the Third Party Landowners (as defined above) of the Review Hearing. Letters to that effect were served on Eastern Power Networks PLC, National Grid Electricity Transmission PLC and National Gas Transmission PLC at their registered office addresses by special delivery and first class post on 11 August 2026. I enclose copies of those letters at [DPK2/110-115].
33. On 17 August 2026, the Claimant received a response from Joanna Lobo of National Grid acknowledging receipt of the notice and enclosures. No further response has been received to date. I enclose a copy of that email at [DPK2/116].

LEASEHOLD TITLE AT STAYTHORPE POWER STATION

34. I wish to update the Court in relation to a leasehold title referred to in the witness evidence filed in support of the original Application.
35. In her First Witness Statement dated 1 October 2025, Rachel Jane Smith referred to a third lease at Staythorpe Power Station (leasehold title number NT421944),

granted out of the Staythorpe Power Station Land, the registered proprietor of which was National Grid Electricity Transmission PLC. Ms Smith noted that this leasehold title was subject to a pending application at HM Land Registry with the reference Q980SQT (the **"Staythorpe Pending Application"**), which she explained related to an application lodged by the Claimant to close a leasehold interest which had now been incorporated into the Claimant's freehold title.

36. I can confirm that HM Land Registry has now completed the registration of the Staythorpe Pending Application (reference Q980SQT) and the leasehold title NT421944 has been closed. The freehold title NT349128 has been updated accordingly to reflect that the former leasehold interest has been incorporated into the Claimant's freehold title. I exhibit at [DPK2/117-119] a copy of the updated freehold title register reflecting the closure of NT421944 and at [DPK2/120] a copy of the Land Registry confirmation showing the closed leasehold title for NT421944.
37. This development does not alter the scope of the Sites in respect of which injunctive relief is sought and does not affect the terms of the Order. For the avoidance of doubt, the land formerly comprised in leasehold title NT421944 falls entirely within the Staythorpe Power Station as defined in Ms Smith's First Witness Statement and as shown edged red on Plan 1 to the Order. The closure of that title is therefore a matter of procedural and administrative completeness only, and the Claimant continues to seek the continuation of the injunction in its current form in relation to all six Sites.

CPS DECISION NOT TO PROSECUTE

38. On 5 September 2026, the Claimant's solicitors were informed by Nottinghamshire Police (Detective Sergeant Millie Gillett of Mansfield CID) that the Crown Prosecution Service had decided not to proceed with a prosecution in relation to the trespass at the Claimant's Staythorpe Power Station on 22 September 2025 (the **"Incident"**), which is described in detail at paragraphs 21 to 28 of the first witness statement of William Henry Jeffery. I exhibit a copy of the email from DS Gillett confirming that decision at [DPK2/121-123].
39. As a consequence of the CPS's decision not to prosecute, any bail conditions to which the individuals arrested in connection with the Incident were subject have fallen away. There is accordingly no longer any external constraint on the conduct of those individuals in relation to the Sites.

40. Of the individuals involved in the Incident, Mr Vincent McGoldrick is the only person whose identity is known to the Claimant. Mr McGoldrick was not joined as a named Defendant to the Claim at the time the Order was made, as the bail conditions to which he was then subject were considered sufficient to restrain his conduct in relation to the Sites (paragraph 28 of my first witness statement). In light of the lapse of those bail conditions, the Claimant wrote to Mr McGoldrick by letters dated 26 and 28 September 2026 (to an address adduced by an enquiry agent), offering him the opportunity to regularise his position by entering into a contractual undertaking to the Claimant in materially the same form as the Undertakings given by the Second and Third Defendants in 2025. The letter informed Mr McGoldrick that, in the event that he did not provide such an undertaking, the Claimant intended to make an application to join him as a named Defendant to the Claim. I exhibit copies of the letters at [DPK2/124-168]. As at the date of this witness statement, no acknowledgement or response from Mr McGoldrick has been received.

STATEMENT OF TRUTH

41. 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.

Dated: 1 October 2026

Signed:

Signed by:

F9708FE3BB1F463...

Full name: Donal Patrick Kelly

On behalf of: Claimant
Witness: Donal Patrick Kelly
No. of witness statement: 2
Exhibit(s): DPK2
Date made: 1 October 2026

Claim No. PT-2025-001017

IN THE HIGH COURT OF JUSTICE

BUSINESS AND PROPERTY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE Generation UK PLC

Claimant

And

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION
ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR
WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM,
FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY
GREENPEACE CAMPAIGN OR OTHERWISE**

(2) Greenpeace UK Limited

(3) Greenpeace Limited

Defendants

**EXHIBIT DPK2 TO THE SECOND WITNESS STATEMENT OF DONAL PATRICK
KELLY**

This is the exhibit marked "**DPK2**" referred to in the Second Witness Statement of Donal Patrick Kelly dated 1 October 2026.

Dated: 1 October 2026

Signed:  Signed by:
Donal Kelly
F9706FE3B61F463...

Name: Donal Patrick Kelly

No.	Document	Page(s)
1.	Screenshot of Order uploaded on website, together with email confirmation from Adriana Gasparini that the Order had been uploaded on 27 October 2025	1-2
2.	Copies of the warning notices and Order affixed at each of the six Sites, together with confirmation provided by David Philips	3-50
3.	Copy of email serving the Order on the Second and Third Defendants on 24 October 2025 at 18:38	51
4.	Copy of email providing the note of the hearing on 24 October 2025 to the Second and Third Defendants (sent 29 October 2025 at 09:39)	52
5.	Copies of letters served on Eastern Power Networks PLC, National Grid Electricity Transmission PLC and National Gas Transmission PLC notifying them of the Order	53-58
6.	Copy of email from Joanna Lobo, Senior Lawyer at National Grid, dated 3 November 2025, acknowledging receipt of the Order	59-62
7.	Emails confirming upload of the New Application (dated 17 July 2026) and the Review Hearing Notice to the RWE website on 27 July 2026	63-67
8.	Copy of: (i) notice affixed at Sites informing persons unknown of: the Application Notice; the Review Hearing Notice; and where the Application and all relevant documents related to the Application can be accessed; and (ii) photographs evidencing placement at Sites	68-96

9.	Copy of email serving the Application Notice on the Second and Third Defendants on 27 July 2026 at 09:28	97-105
10.	Copy of email from Jack Robirosa (on behalf of the Second and Third Defendants) dated 30 July 2026 at 10:02, confirming the Second and Third Defendants would not be attending the Review Hearing	106
11.	Copy of email serving the Review Hearing Notice on the Second and Third Defendants on 10 August 2026 at 10:24	107-109
12.	Copies of letters to Eastern Power Networks PLC, National Grid Electricity Transmission PLC and National Gas Transmission PLC notifying them of the Review Hearing (served by special delivery and first class post on 11 August 2026)	110-115
13.	Copy of email from Joanna Lobo of National Grid dated 17 August 2026, acknowledging receipt of the notice of the Review Hearing	116
14.	Copy of updated freehold title register for title NT349128, reflecting the closure of leasehold title NT421944 following completion of the Staythorpe Pending Application (reference Q980SQT)	117-119
15.	Copy of Land Registry confirmation showing the closed leasehold title for NT421944	120
16.	Copy of email from Detective Sergeant Millie Gillett of Nottinghamshire Police (Mansfield CID), dated 5 September 2026, confirming the Crown Prosecution Service's decision not to prosecute in relation to the trespass at Staythorpe Power Station on 22 September 2025	121-123

17.	Copies of letters dated 26 and 28 September 2026 sent to Mr Vincent McGoldrick offering him the opportunity to provide a contractual undertaking to the Claimant	124-168
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Injunction

Following recent trespass at one of its operational power stations, RWE Generation UK plc (RWE) has secured an injunction in the High Court of England and Wales in order to protect six of its major gas generating sites:

- Staythorpe,
- Pembroke,
- Didcot B,
- Little Barford,
- Great Yarmouth and
- Kings Lynn power stations.

Gas generation is key in providing security of supply in the UK and the safe and continuing operation of these gas generating sites is therefore paramount. An interim injunction was granted by the High Court on the 3rd of October and upheld on 24 October 2025. At present, the injunction is scheduled to continue until 24 October 2026 and will protect those sites against trespassers as well as ensuring the safety of our operational staff. RWE applied on 17 July 2026 to extend the injunction for a period of 12 months, from and including 24 October 2026.

For further detail, please see the Injunction Documents.

Interim Injunctive Relief: Ex-Parte Hearing Documents

[Claim Form](#)

[Particulars of Claim](#)

[Application Notice \(First Hearing\)](#)

[Skeleton Argument](#)

[Interim Injunction Order](#)

[Note of the Hearing](#)

Continuation of Interim Injunctive Relief: Return Hearing Documents

[Application Notice \(Return Hearing\)](#)

[Hearing Bundle](#)

[Continuation of the Interim Injunction Order](#)

[Note of the Return Hearing](#)

Application to Extend: Application Documents

[Application Notice \(Application to Extend\)](#)

[Endorsed Application Notice \(Application to Extend\)](#)

[Notice of Hearing \(Application to Extend\)](#)

From: Gasparini, Adriana <Adriana.Gasparini@rwe.com>
Sent: 27 October 2025 10:28
To: Donal Kelly; Smith, Rachel; Rees, Michael; Jeffery, Will; Standen, Sarah
Cc: Carl Roche; Sophie Abbott; Khushal Thobhani; George Bristow; Michael Smart
Subject: RE: Injunction Order - 24 October 2025 [OC-OC_UK.FID8569336]

Hi Donal,

Order uploaded to the website (last document): <https://uk.rwe.com/injunction/> . Please send me a separate email if you require any amendments and I will get that done.

Kind regards,

Adriana

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 24 October 2025 exists relating to the land and premises known as Kings Lynn Power Station, Kings Lynn, PE34 3RD.

The injunction means you may not:

FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE) OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 6, BEING:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

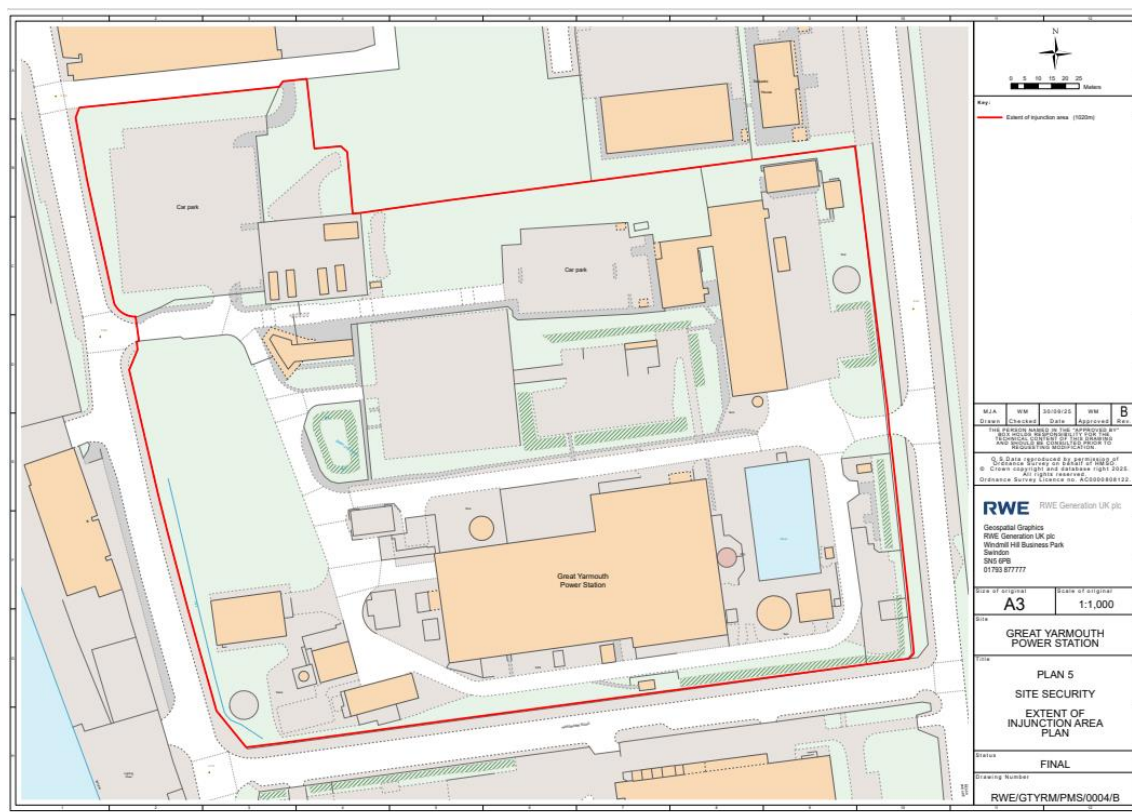
A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing: injunctions@osborneclarke.com

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 24 October 2025 exists relating to the land and premises known as Great Yarmouth Power Station, South Denes Road, Great Yarmouth, NR30 3PY.

The injunction means you may not:

FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE) OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5, BEING:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing: injunctions@osborneclarke.com

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 24 October 2025 exists relating to the land and premises known as Didcot Power Station, Didcot, Oxfordshire, OX11 7YU.

The injunction means you may not:

FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE) OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 2, BEING:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing: injunctions@osborneclarke.com

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 24 October 2025 exists relating to the land and premises known as Staythorpe Power Station, Staythorpe, Newark, NG23 5RQ.

The injunction means you may not:

FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE) OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 1, BEING:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

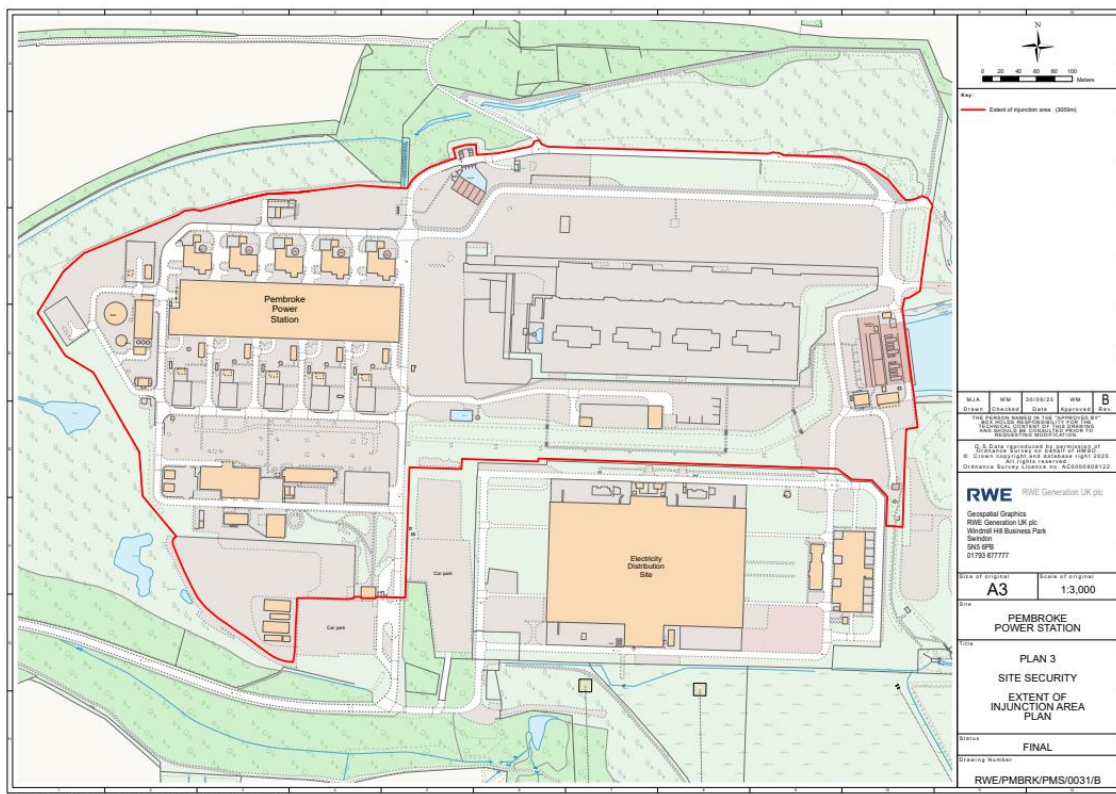
A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing: injunctions@osborneclarke.com

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 24 October 2025 exists relating to the land and premises known as Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS.

The injunction means you may not:

FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE) OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 3, BEING:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing: injunctions@osborneclarke.com

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 24 October 2025 exists relating to the land and premises known as Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT.

The injunction means you may not:

FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE) OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4. BEING:



**ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING
ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE
HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED
OR HAVE THEIR ASSETS SEIZED**

A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing: injunctions@osborneclarke.com

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)



Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR 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.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it 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.

BEFORE the Honourable Mr Justice Trower on 24 October 2025

UPON the Claimants having issued this Claim by a Claim Form dated 1 October 2025

AND UPON the Claimant's application for an ex parte interim injunction by Application Notice dated 1 October 2025

AND UPON interim injunctive relief having been granted at an ex parte hearing by the Honourable Mr Justice Rajah on 3 October 2025

AND UPON the Claimants seeking continuation of the interim injunctive relief granted on 3 October 2025

AND UPON the Second Defendant and Greenpeace Limited (which is joined to these proceedings as Third Defendant for the purpose of giving the undertaking hereinafter referred to) having agreed terms including undertakings provided by those Defendants to the Court on 24 October 2025 annexed to this Order at Schedule 4 ("the Undertakings")

AND UPON the Court having accepted the Undertakings

AND UPON READING the Witness Statements of Rachel Jane Smith dated 1 October 2025, William Henry Jeffery dated 1 October 2025, and Donal Patrick Kelly dated 20 October 2025

AND UPON HEARING Timothy Morshead KC and Jacqueline Lean for the Claimant

AND UPON the Claimant giving and the Court accepting the undertakings set out in Schedule 1 to this Order

IT IS ORDERED THAT:

INJUNCTION

1. The First Defendants must not enter, occupy or remain on, or damage or deface any part (including the perimeter fence), of the land and premises shown edged red on Plans 1 to 6 to this Order, being:
 - (i) Staythorpe Power Station, Staythorpe, Newark, NG23 5RQ, as shown edged red on Plan 1;
 - (ii) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - (iii) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - (iv) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - (v) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5.
 - (vi) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6.
2. In respect of anything prohibited by paragraph 1 above, the First Defendants must not (a) do it himself/herself/themselves in any other way or (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

REVIEW

3. The injunction set out at paragraphs 1 and 2 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant shall file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days

before the hearing. The injunction set out at paragraphs 1 and 2 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place, such application to be made not less than 3 months before the date on which the injunction would otherwise lapse. Provided such application is made not less than 3 months before the anniversary of the order (or as the case may be the latest annual review) the Court shall list the review hearing on or before the date on which the injunction set out at paragraphs 1 and 2 of this Order would otherwise lapse.

SERVICE AND NOTIFICATION

4. Service of this Order on the First Defendant is dispensed with, pursuant to CPR 6.28 and 81.4(2)(c).
5. This Order be notified to the First Defendants by the Claimant carrying out each of the following steps:
 - (i) Uploading a copy on to the following website: <https://uk.rwe.com/injunction>
 - (ii) Affixing a copy of the Order in A4 size in a clear plastic envelope at prominent locations at each of the Sites shown edged red on Plans 1 to 6.
 - (iii) Affixing warning notices of A2 size at those locations at each of the sites shown edged red on Plans 1 to 6, substantially in the form of the notice at Schedule 3.
6. Notification to the First Defendants of any further applications or documents shall be effected by the Claimants carrying out each of the following steps:
 - (i) Uploading a copy of the application on to the following website: <https://uk.rwe.com/injunction>

- (ii) Affixing notices at or near the aforesaid prominent locations at the relevant Site/s shown edged red on Plans 1-6, stating that the application has been made or document/s provided and where the application or document/s can be accessed in hard copy and online.
- 7. In respect of paragraphs 5 and 6 above, effective notification will be deemed to have taken place in relation to each Site on the date on which all the relevant steps have been carried out.
- 8. For the avoidance of doubt, in respect of the steps referred to at paragraphs 5(ii), 5(iii), and 6(ii), effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed or defaced without the Claimant's consent.
- 9. The Claimant shall use reasonable endeavours to maintain and as the case may be replace the documents in their fixed positions and in legible form.
- 10. In relation to the Second Defendant: pursuant to CPR rule 6.27, the Claimant has permission to serve the Second Defendant with this Order and any further applications or documents in the Claim by email to:
 - (i) exuk@greenpeace.org; and
 - (ii) jack.robirosa@greenpeace.org
- 11. In relation to the Third Defendant: pursuant to CPR rule 6.27, the Claimant has permission to serve the Third Defendant with this Order and any further applications or documents in the Claim by email to:
 - (i) exuk@greenpeace.org; and
 - (ii) jack.robirosa@greenpeace.org
- 12. The deemed date of service of any documents referred to in paragraphs 10 and 11 above shall be the day on which service is completed in accordance with paragraph 10 or 11 above.

13. The Claimant shall use reasonable endeavours to notify the owners (where known) of the areas of land shown hatched blue on Plans 1A, 2A, 4A, 5A and 6A at Annexure 2 to the Particulars of Claim of this Order by not later than 5pm on 31 October 2025.

VARIATION

14. Anyone interested may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant 48 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant at least 24 hours in advance of any hearing.
15. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
16. The Claimant has liberty to apply to vary this Order.

OTHER ORDERS

17. The Third Defendant is joined as a party to this claim pursuant to the Claimant's application dated 23 October 2025.
18. It shall be sufficient for the Claimant to notify the First Defendant of the application dated 23 October 2025 by undertaking the step specified in paragraph 6(i) of this Order, namely by uploading a copy of the application on to the following website: <https://uk.rwe.com/injunction>.

COSTS

19. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

20. The Claimant's solicitors and their contact details are:

- (i) Carl Roche of Osborne Clarke LLP, email: carl.roche@osborneclarke.com
- (ii) Donal Kelly of Osborne Clarke LLP, email: donal.kelly@osborneclarke.com

Osborne Clarke LLP, One London Wall, London, EC2Y 5EB

COMMUNICATIONS WITH THE COURT

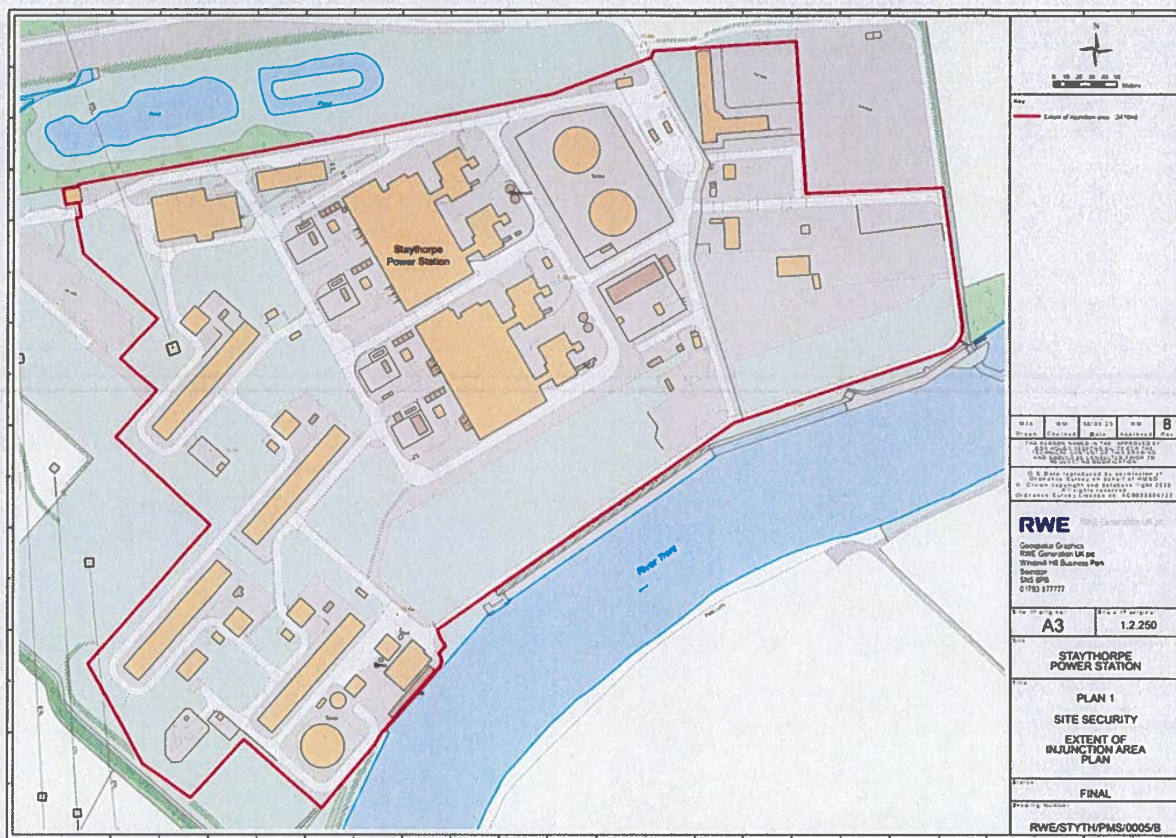
Chancery Division, The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL by
the Court's e-filing service at <https://efile.cefile-app.com>

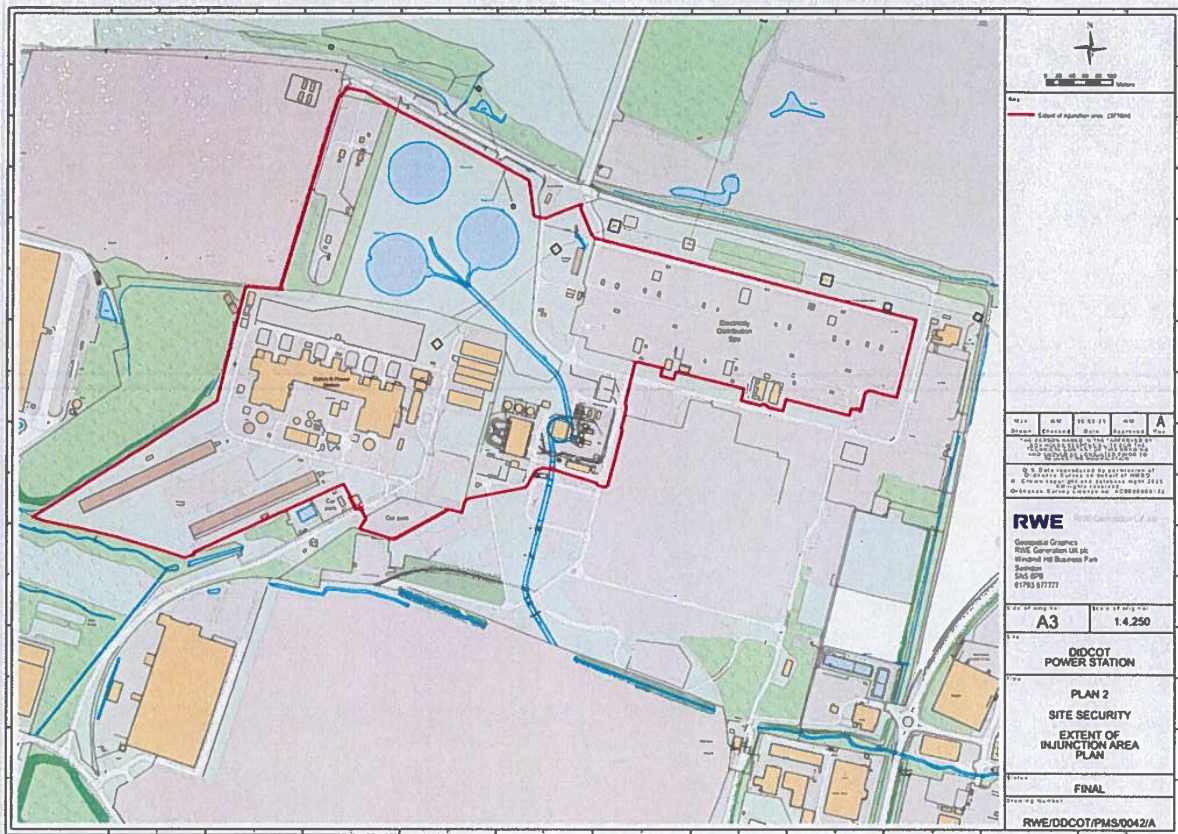
Dated: 24 October 2025

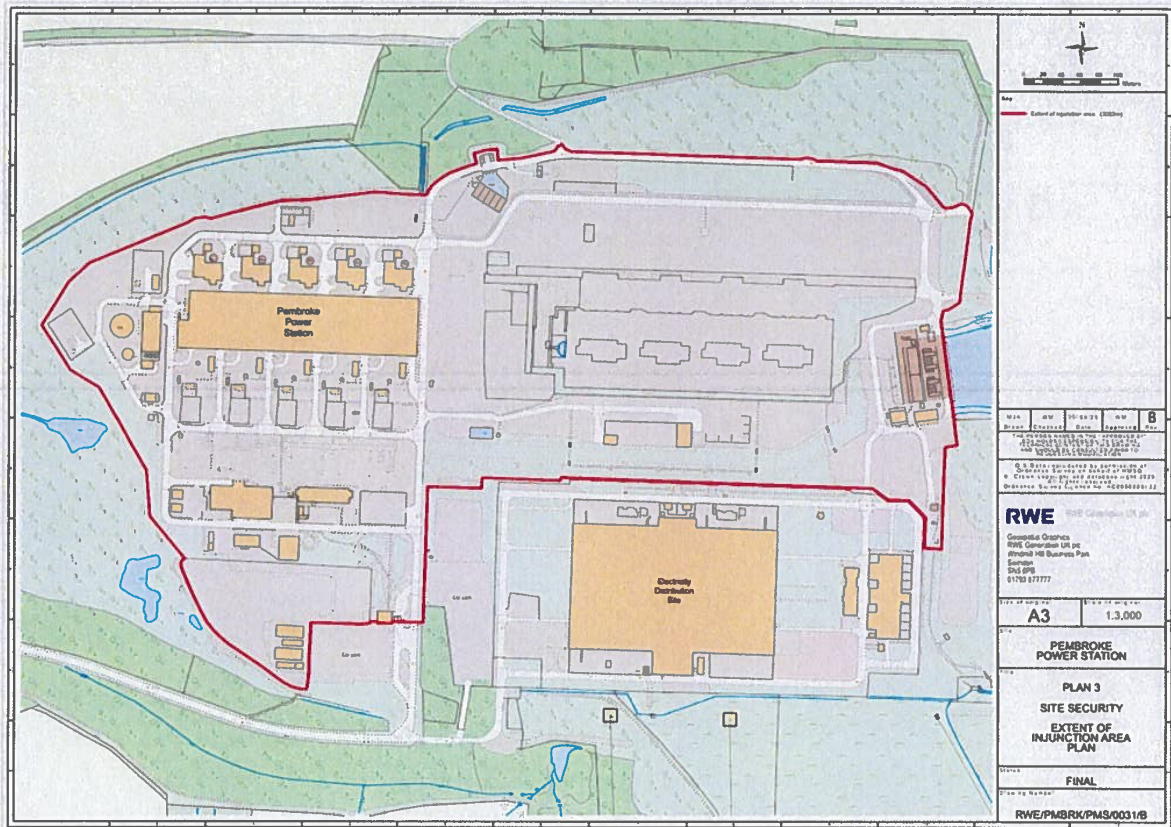
SCHEDULE 1 – CLAIMANT’S UNDERTAKINGS

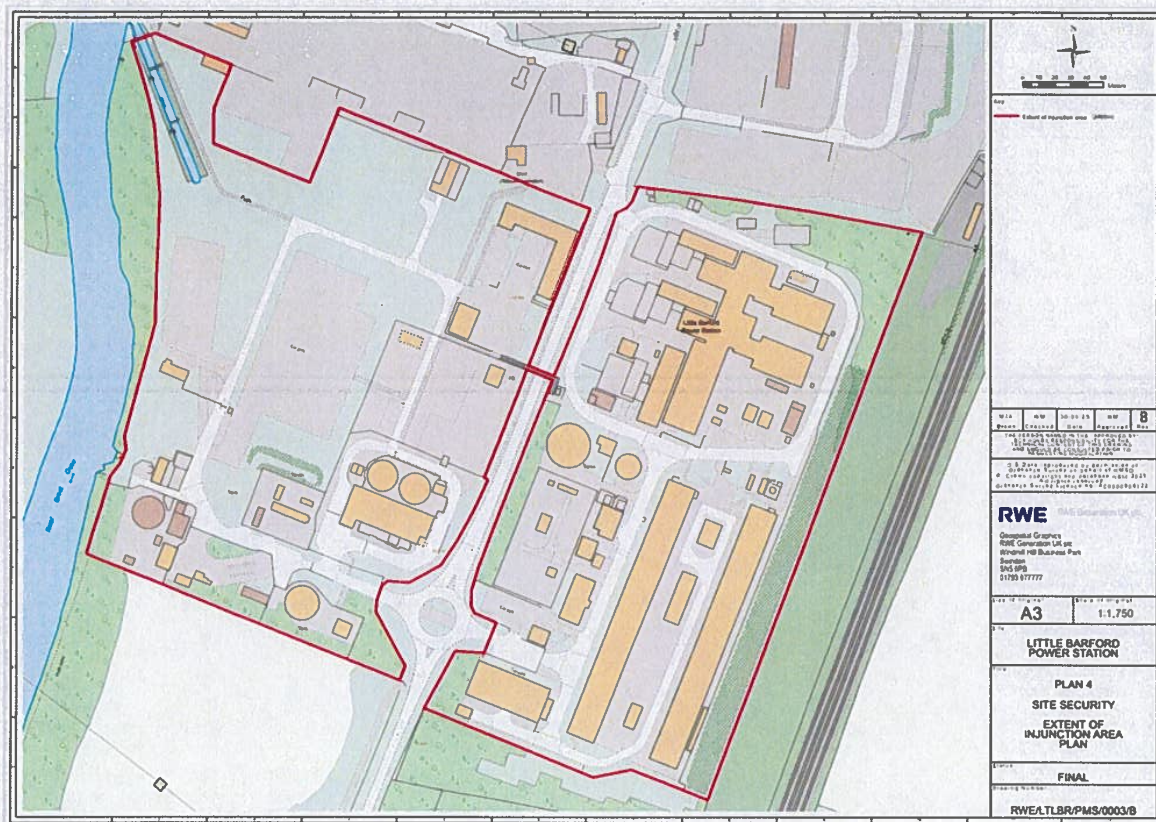
1. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraphs 1 or 2 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

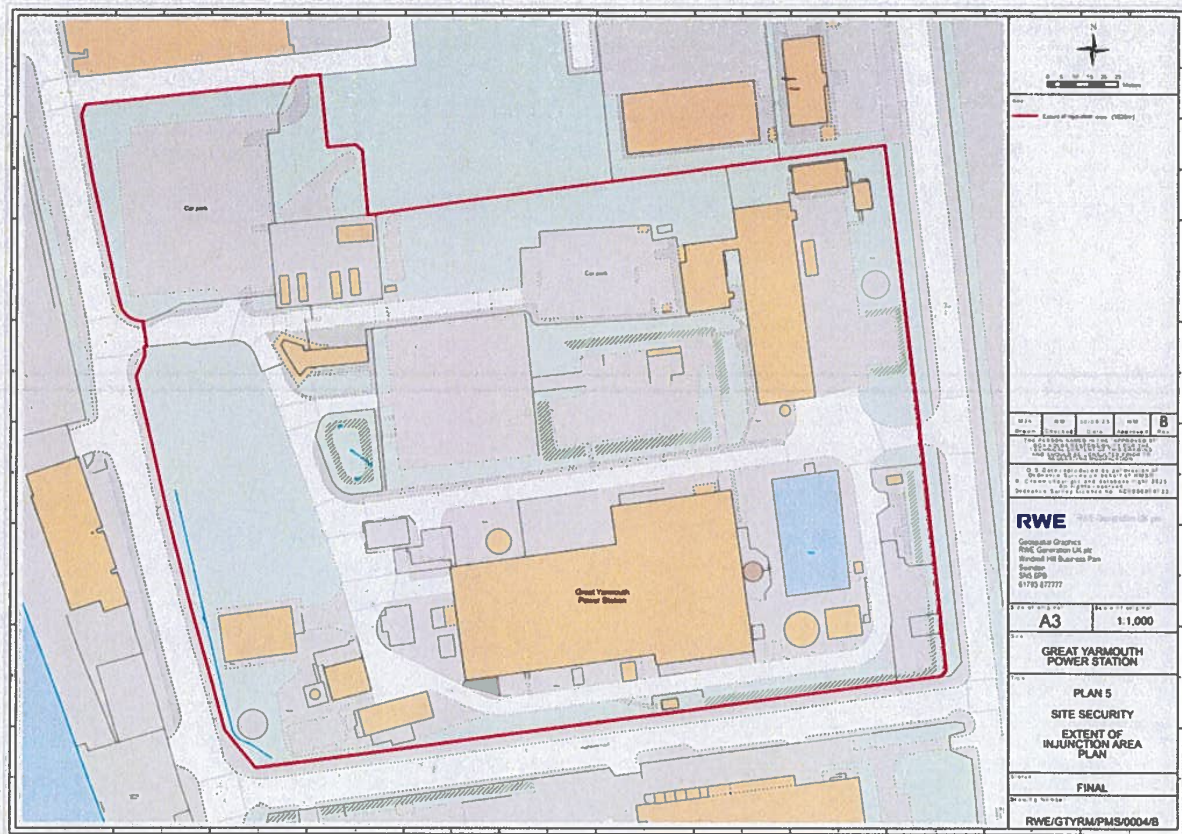
SCHEDULE 2 – PLANS

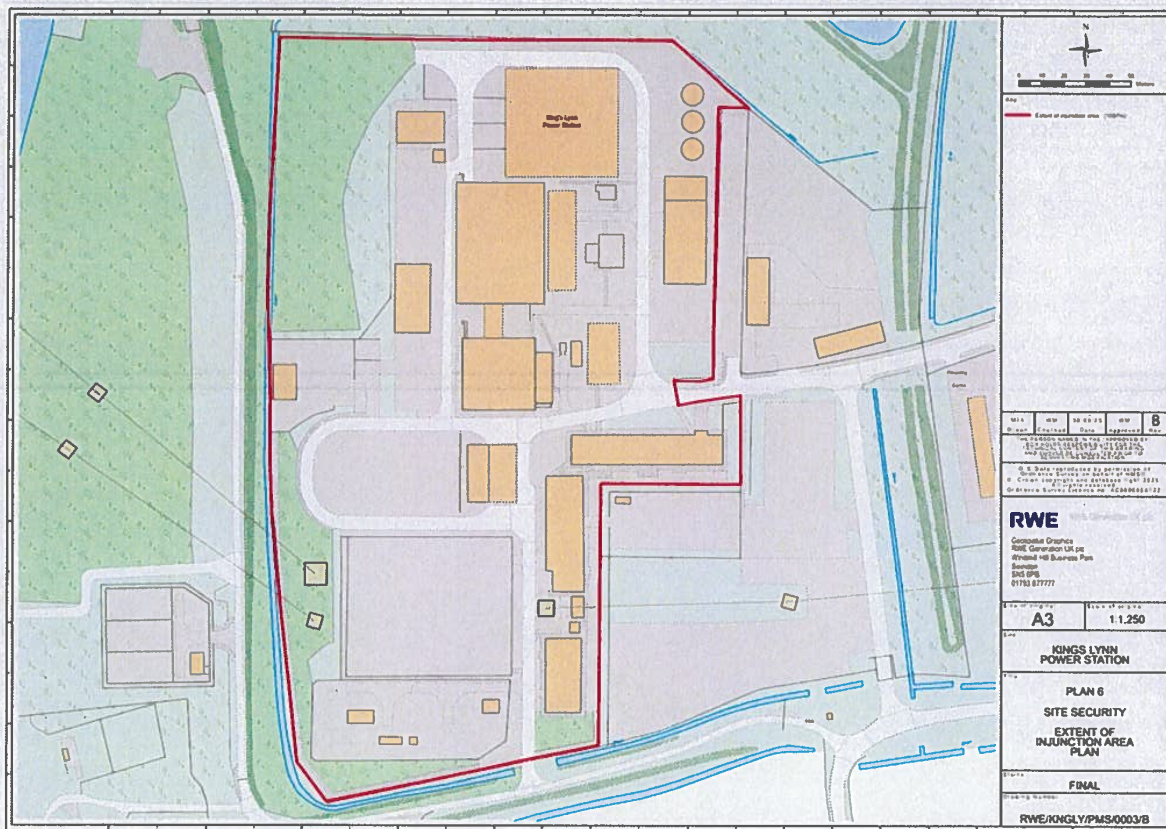












SCHEDULE 3– WARNING NOTICE

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 2025 exists relating to the land and premises known as

The injunction means you may not:

**FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR
DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE)
OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN
BEING**

[Plan]

**ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING
ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE
HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED
OR HAVE THEIR ASSETS SEIZED**

A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing injunctions@osborneclarke.com

**SCHEDULE 4 – UNDERTAKINGS GIVEN BY THE SECOND AND THIRD
DEFENDANTS**

Claim No: PT-2025-001017

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PROPERTY, TRUST AND PROBATE LIST



BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN THIRD DEFENDANT BREACH THE UNDERTAKING OFFERED BY YOU HEREIN OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THAT UNDERTAKING, YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

RECITALS

- A. On 3 October 2025, the court made an order on an ex parte basis restraining the Second Defendant from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises as set out in paragraph 1 of that order (the "Interim Order").
- B. The Interim Order was sealed by the court on 6 October 2025.

- C. The return date hearing is listed for 24 October 2025.
- D. The Third Defendant, without admission of liability, is willing to give an undertaking to the court on substantially the same terms as the Interim Order.
- E. The Claimant is willing to settle the Claim against the Third Defendant on the basis of the undertaking and the terms set out below.

Undertaking to the Court

1. Until the date 12 months from the date of this order or until further order of the court, whichever is earlier, the Third Defendant undertakes to the court that the Third Defendant will not:
 - i. enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the land and premises shown edged red on Plans 1 to 6 to this order, being:
 - a) Staythorpe Power Station, Staythorpe, Newark, NG23 5PS, as shown edged red on Plan 1;
 - b) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - c) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - d) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - e) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5; and
 - f) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6; and
 - ii. in respect of anything prohibited by paragraph i above, (a) do it himself / herself / themselves in any other way or (b) do it by means of another person acting on his / her / their behalf, or acting on his / her / their instructions.

Duration, Liberty to Apply and Variations

2. The undertaking shall take effect immediately and shall continue until the date 12 months from the date of this order or until further order of the court, whichever is earlier.
3. Upon the making of this Order, the Claim against the Third Defendant shall be stayed except for the purpose of giving effect to its terms and to the Third Defendant's undertaking.
4. Subject to the Third Defendant having complied with its undertaking and the terms of this Order, the claim against the Third Defendant shall be dismissed with no order as to costs on the date 12 months from the date of this Order.

Service

5. Service of this order may be effected by email to jack.robirosa@greenpeace.org and exuk@greenpeace.org.

Costs

5. There be no order as to the costs of and occasioned by this order and the undertaking recorded herein.

Statement of Acknowledgment by the Third Defendant

The Third Defendant understands that the undertaking above has the same force and effect as an order of the court. The Third Defendant understands that if it breaches this undertaking it may be held in contempt of court and may be imprisoned, fined and / or have its assets seized. The Third Defendant confirms that it has been advised that it should seek legal advice. The Third Defendant confirms that it understands the meaning and effect of the undertaking.

Signed: Jack Robirosa

Name: Jack Robirosa

For and on behalf of the Third Defendant

Date: 24 October 2025

OR

Signed: _____

[Solicitors' name], Solicitors for the Third Defendant

[Address, reference, email, telephone]

Date:

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

Before: The Honourable Mr Justice Trower

Dated: 24 October 2025

BETWEEN:

RWE GENERATION UK PLC

(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED

(Company registration number 02463348)

(3) GREENPEACE LIMITED

(Company registration number 01314381)

Defendants

ORDER

The Court accepts the undertakings given by the Third Defendant in the Order hereby approved and attached, but any director of the Third Defendant desiring to contend that the person signing the undertaking on its behalf was not authorised to do so may apply for that purpose by not later than 4pm on 29 October 2025.

Judge's Endorsement

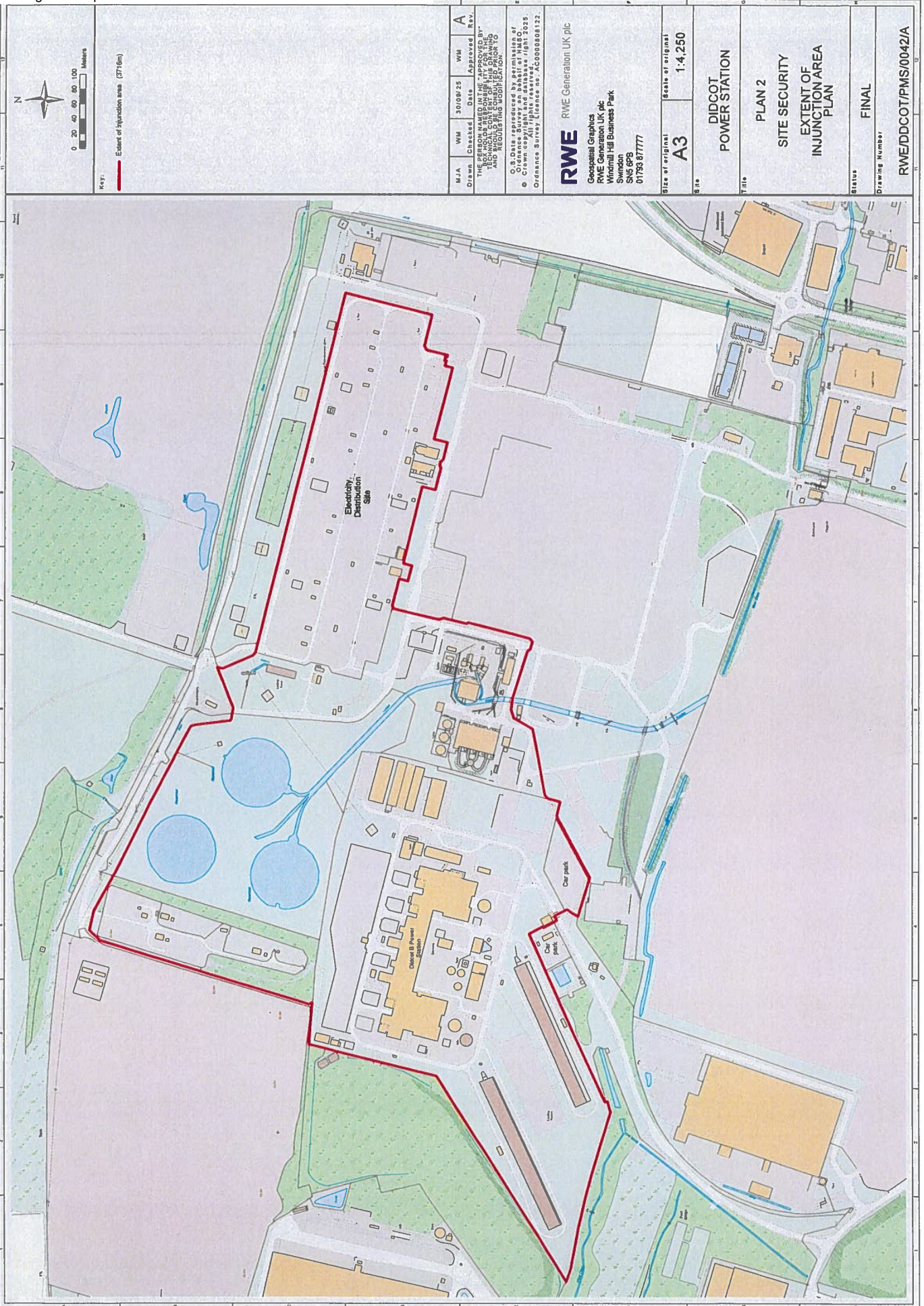
The Court notes and accepts the undertakings given by the Third Defendant recorded above.

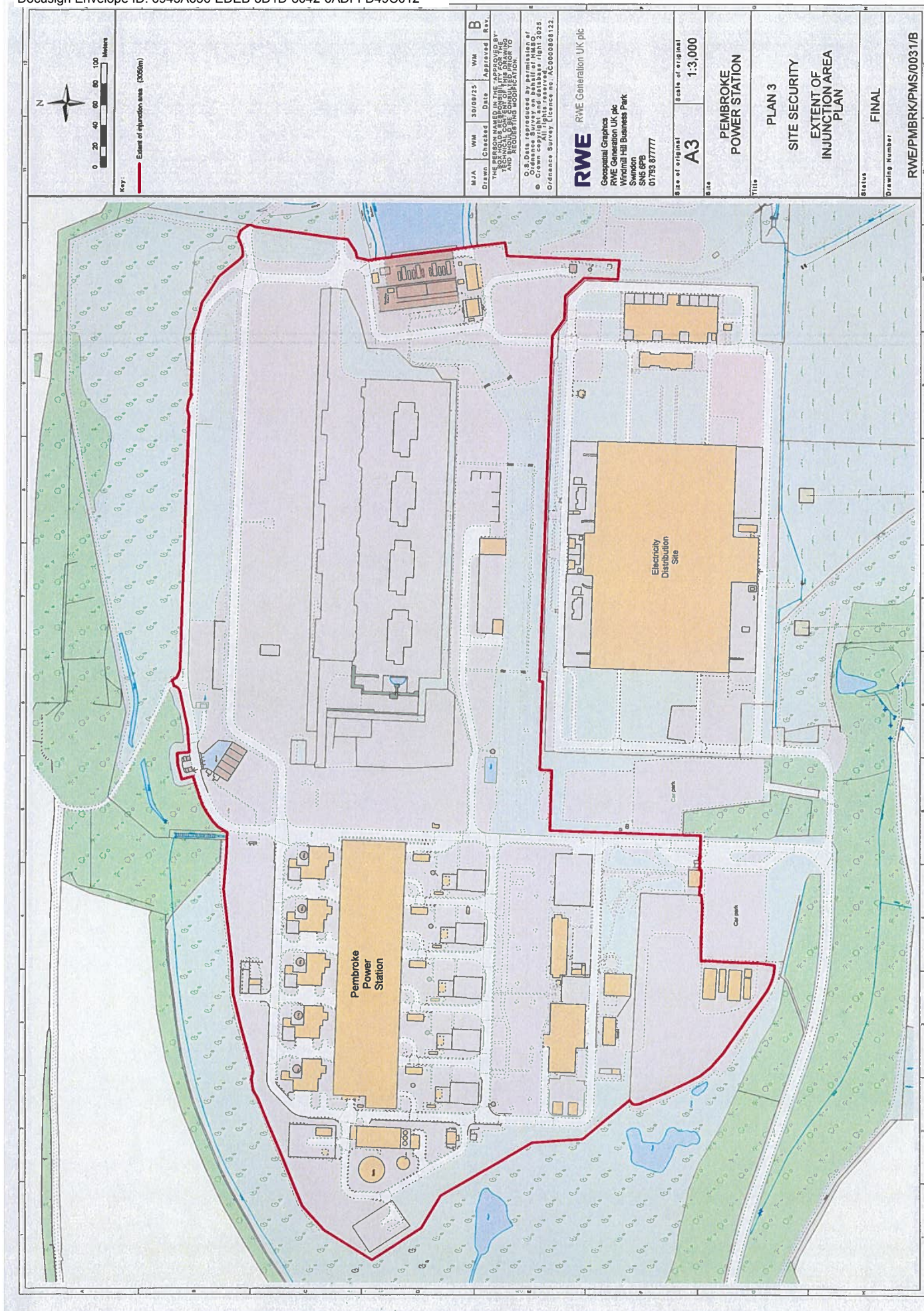
Dated: 24 October 2025

Judge: *Alvin Thomas*

SCHEDULE 1: PLANS 1-6







Claim No: PT-2025-001017

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PROPERTY, TRUST AND PROBATE LIST



BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)

Claimant

and

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR
REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE
OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES
OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR
OTHERWISE.**

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

**IF YOU THE WITHIN SECOND DEFENDANT BREACH THE UNDERTAKING OFFERED BY YOU
HEREIN OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THAT UNDERTAKING, YOU
MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE
YOUR ASSETS SEIZED.**

RECITALS

- A. On 3 October 2025, the court made an order on an ex parte basis restraining the Second Defendant from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises as set out in paragraph 1 of that order (the "Interim Order").

- B. The Interim Order was sealed by the court on 6 October 2025.
- C. The return date hearing is listed for 24 October 2025.
- D. The Second Defendant, without admission of liability, is willing to give an undertaking to the court on substantially the same terms as the Interim Order.
- E. The Claimant is willing to settle the Claim against the Second Defendant on the basis of the undertaking and the terms set out below.

Undertaking to the Court

1. Until the date 12 months from the date of this order or until further order of the court, whichever is earlier, the Second Defendant undertakes to the court that the Second Defendant will not:
 - i. enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the land and premises shown edged red on Plans 1 to 6 to this order, being:
 - a) Staythorpe Power Station, Staythorpe, Newark, NG23 5PS, as shown edged red on Plan 1;
 - b) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - c) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - d) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - e) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5; and
 - f) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6; and
 - ii. in respect of anything prohibited by paragraph i above, (a) do it himself / herself / themselves in any other way or (b) do it by means of another person acting on his / her / their behalf, or acting on his / her / their instructions.

Duration, Liberty to Apply and Variations

2. The undertaking shall take effect immediately and shall continue until the date 12 months from the date of this order or until further order of the court, whichever is earlier.
3. Upon the making of this Order, the Claim against the Second Defendant shall be stayed except for the purpose of giving effect to its terms and to the Second Defendant's undertaking.
4. Subject to the Second Defendant having complied with its undertaking and the terms of this Order, the claim against the Second Defendant shall be dismissed with no order as to costs on the date 12 months from the date of this Order.

Service

5. Service of this Order on the Second Defendant may be effected by email to jack.robirosa@greenpeace.org and exuk@greenpeace.org.

Costs

6. There be no order as to the costs of and occasioned by this order and the undertaking recorded herein.

Statement of Acknowledgment by the Second Defendant's representative

The Second Defendant understands that the undertaking above has the same force and effect as an order of the court. The Second Defendant understands that if it breaches this undertaking it may be held in contempt of court and may be imprisoned, fined and / or have its assets seized. The Second Defendant confirms that it has been advised that it should seek legal advice. The Second Defendant confirms that it understands the meaning and effect of the undertaking.

Signed: Jack Robirosa

Name: Jack Robirosa

For and on behalf of the Second Defendant

Date: 24 October 2025

OR

Signed: _____

[Solicitors' name], Solicitors for the Second Defendant

[Address, reference, email, telephone]

Date:

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

Before: The Honourable Mr Justice Trower

Dated: 24 October 2025

BETWEEN:

RWE GENERATION UK PLC

(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED

(Company registration number 02463348)

(3) GREENPEACE LIMITED

(Company registration number 01314381)

Defendants

ORDER

The Court accepts the undertakings given by the Second Defendant in the Order hereby approved and attached, but any director of the Second Defendant desiring to contend that the person signing the undertaking on its behalf was not authorised to do so may apply for that purpose by not later than 4pm on 29 October 2025.

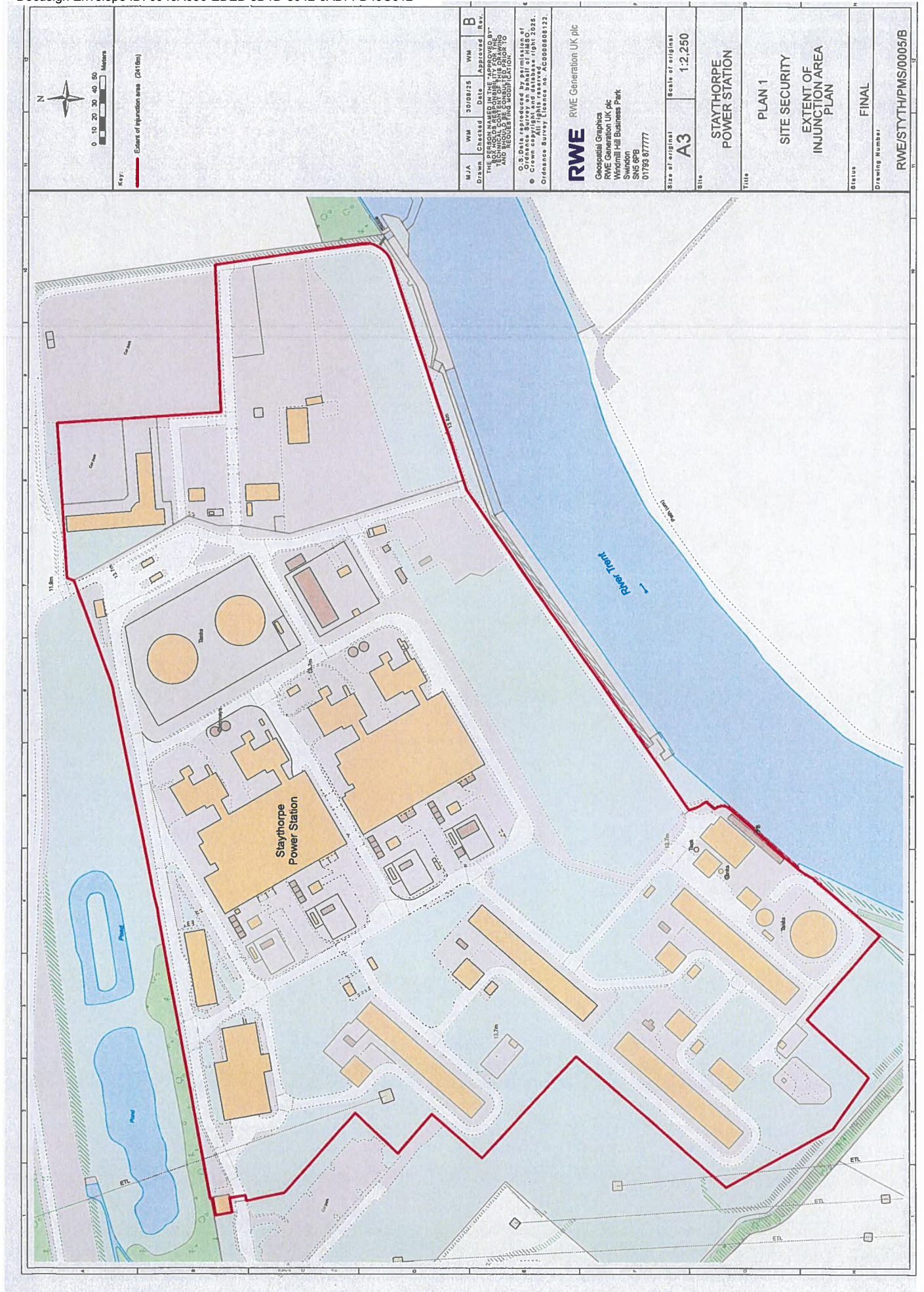
Judge's Endorsement

The Court notes and accepts the undertakings given by the Second Defendant recorded above.

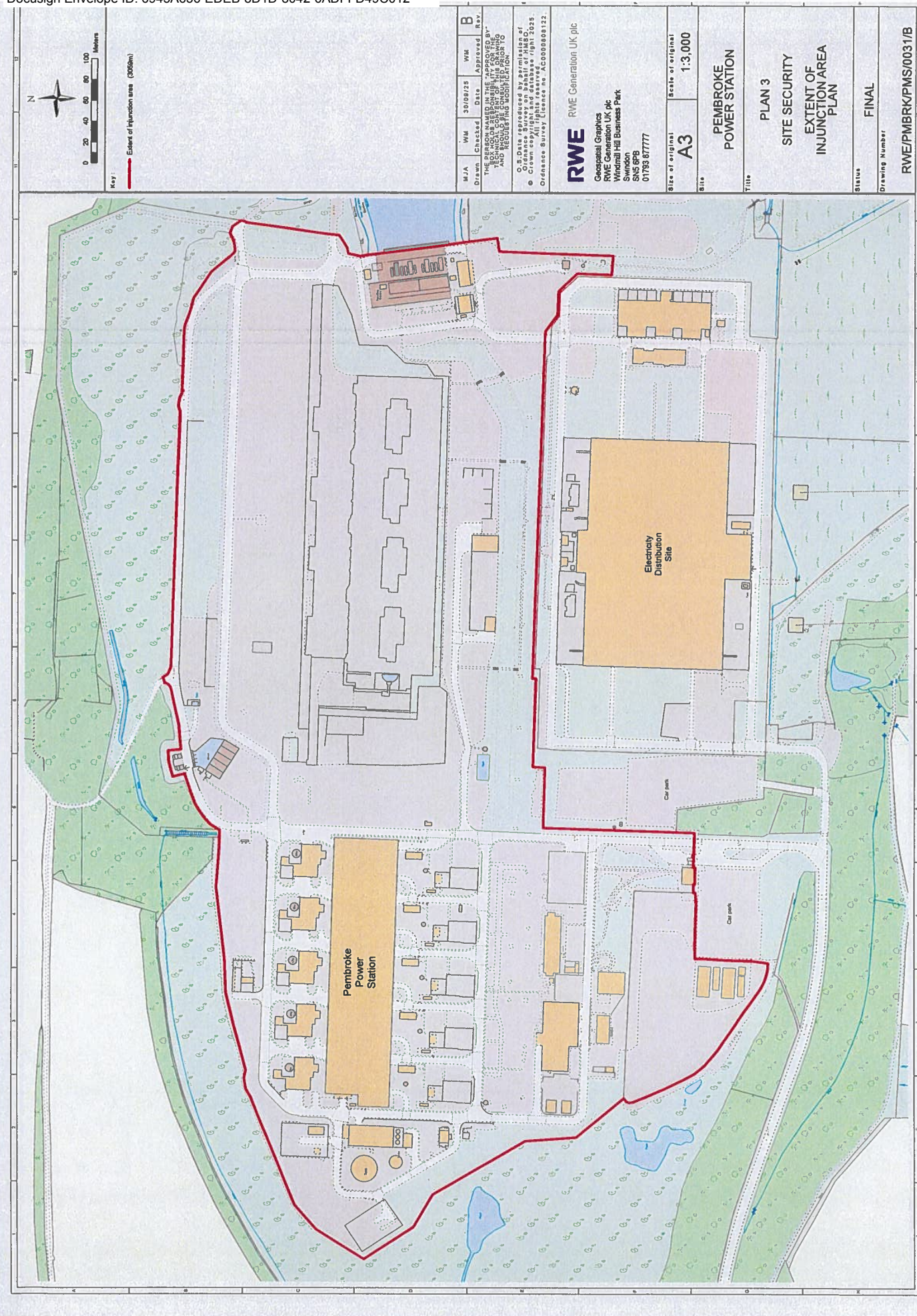
Dated: 24 Oct 2025

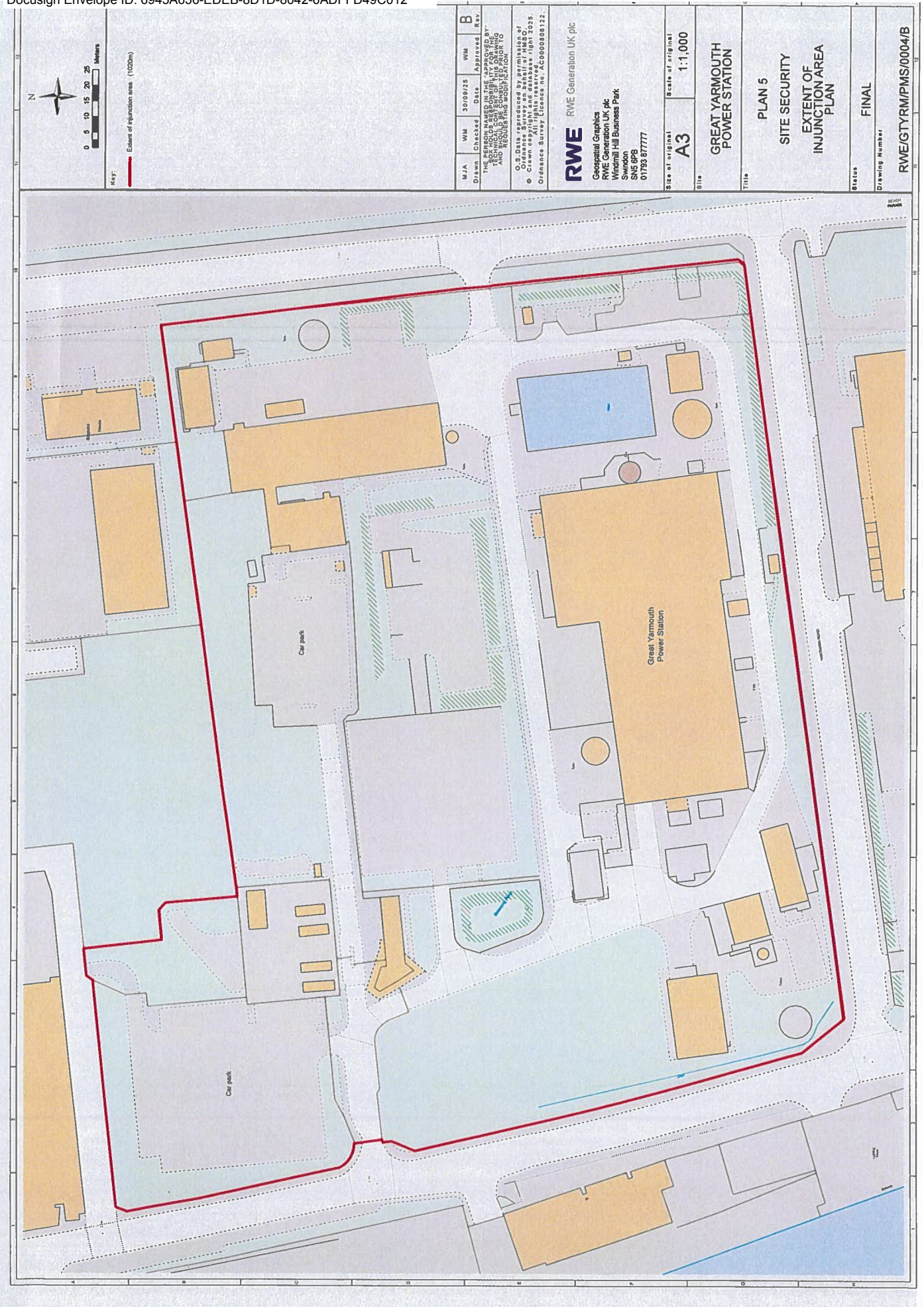
Judge: Helen Goss

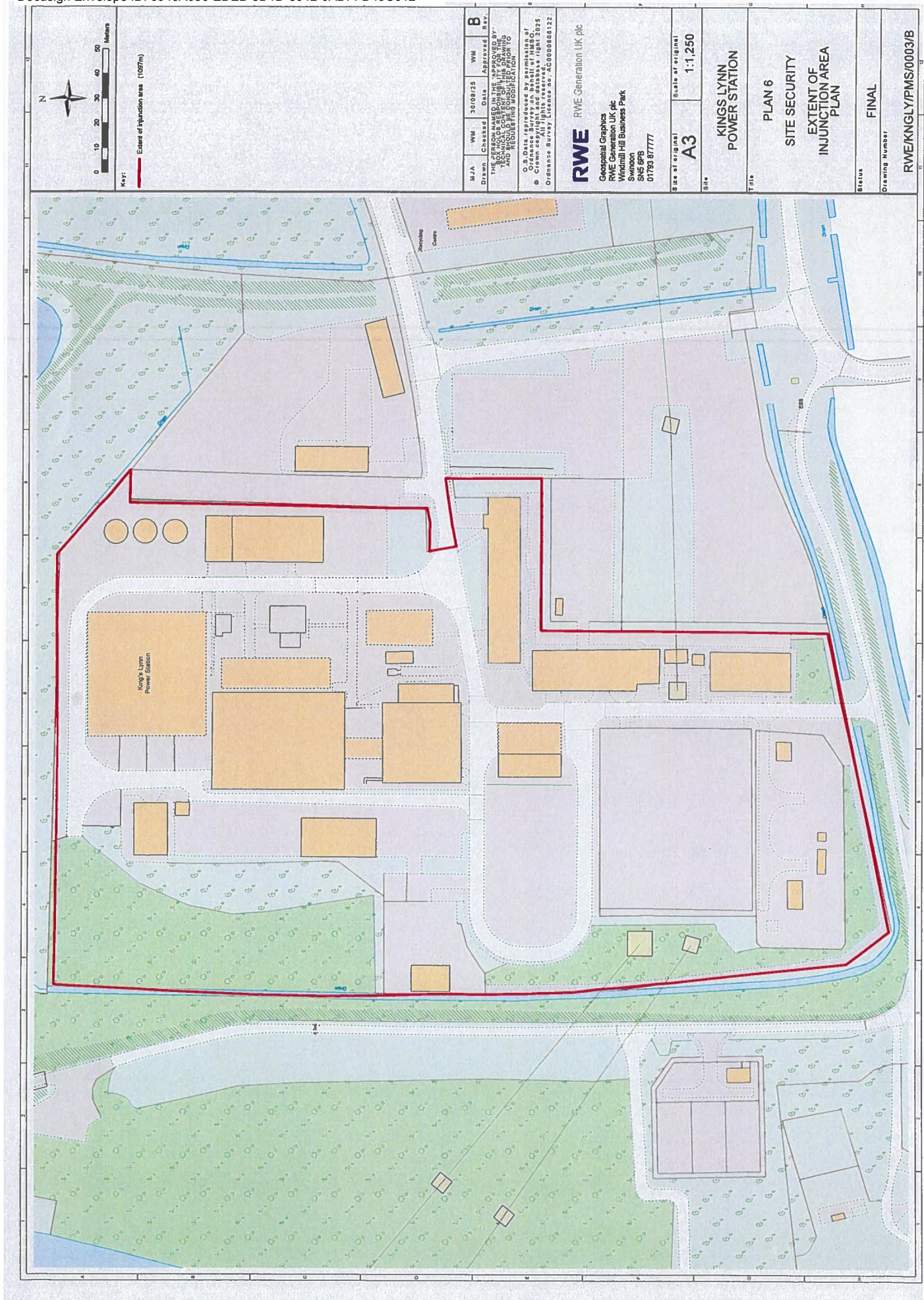
SCHEDULE 1: PLANS 1-6











Khushal Thobhani

From: Phillips, David <David.Phillips@rwe.com>
Sent: 01 October 2026 12:52
To: Donal Kelly
Subject: Injunction signage and documentation posting

**** EXTERNAL EMAIL ****

Hello Donal,

I have spoken with my respective site colleagues and the table below contains confirmed dates we completed the Injunction signage and documentation posting on the site perimeters.

We can also confirm that regular perimeter inspections are carried out as part of our operations procedures for security purposes. Any damage to the signage or documentation would be quickly identified and rectified.

Site	Date of completion of affixing
Staythorpe Power Station	17 December 2025
Didcot Power Station	27 January 2026
Pembroke Power Station	25 November 2025
Little Barford Power Station	18 November 2025
Great Yarmouth Power Station	25 December 2025
Kings Lynn Power Station	1 December 2025

Regards,

David

Beste GrüÙe / Best Regards/ Met vriendelijke groet

David Phillips

Head of Asset Optimisation, Governance & Decision Support (Gas)

RWE Generation

Gas Asset Management

Trigonos Building, Windmill Hill Business Park, Swindon, SN5 6PB.

Tel (Internal): 7322 3937

Tel (External): +44 (0)1793 893937

Mobile: +44 (0)7989 494245

Mail to: David.Phillips@rwe.com

From: Injunctions
Sent: 24 October 2025 18:38
To: Jack Robirosa; exuk@greenpeace.org
Cc: Donal Kelly
Subject: Claim No: PT-2025-001017 RWE Generation UK Plc v (1) Persons Unknown, (2) Greenpeace UK Limited and (3) Greenpeace Limited [OC-OC_UK.FID8569336]
Attachments: PT-2025-001017_ Sealed & Signed Order - 24 October 2025.pdf

Dear Directors,

Please see attached, by way of service on the Second Defendant and Third Defendant, the Order of the Honourable Mr Justice Trower dated 24 October 2025.

Yours faithfully

Osborne Clarke LLP
osborneclarke.com

.....
E injunctions@osborneclarke.com
T + 44 20 7105 7000
One London Wall, London EC2Y 5EB
.....



From: Injunctions
Sent: 29 October 2025 09:39
To: 'Jack Robirosa'
Subject: RE: Claim No: PT-2025-001017 RWE Generation UK Plc v (1) Persons Unknown, (2) Greenpeace UK Limited and (3) Greenpeace Limited [OC-OC_UK.FID8569336]
Attachments: PT-2025-001017_ Note of Return Hearing - 24 October 2025 (1).pdf

Dear Mr Robirosa,

Further to the emails below, please see the attached note of the hearing.

Yours faithfully

Osborne Clarke LLP

[osborneclarke.com](https://www.osborneclarke.com)

.....
E injunctions@osborneclarke.com

T + 44 20 7105 7000

One London Wall, London EC2Y 5EB
.....



By first class post and special delivery

Eastern Power Networks PLC
Newington House
237 Southwark Bridge Road
London
SE1 6NP

Our ref.
Contact
Phone
Email

29 October 2025

Dear Directors,

URGENT: THIS LETTER CONCERNS AN INJUNCTION. YOU SHOULD READ IT CAREFULLY.

Little Barford Power Station:	Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT
Little Barford Lease:	Leasehold interest registered with HM Land Registry under title reference BD168495, being a lease dated 30 March 1990 and made between (1) Central Electricity Generating Board and (2) Eastern Electricity Board
Great Yarmouth Power Station:	Great Yarmouth Power Station, South Denes Road, Great Yarmouth, NR30 3PY
Great Yarmouth Lease:	Leasehold interest registered with HM Land Registry under title reference NK363229, being a lease dated 26 July 2007 and made between (1) Great Yarmouth Power Limited and (2) EDF Energy Networks (EPN) PLC
Second Great Yarmouth Lease:	Leasehold interest registered with HM Land Registry under title reference NK363233, being a lease dated 26 July 2007 and made between (1) Great Yarmouth Power Limited and (2) EDF Energy Networks (EPN) PLC (the Great Yarmouth Lease together with the Second Great Yarmouth Lease, the "Great Yarmouth Leases")
Kings Lynn Power Station:	Kings Lynn Power Station, Kings Lynn PE34 3RD
Kings Lynn Freehold Interest:	Freehold interest registered with HM Land Registry under title reference NK218673, being land to the North of North Sea Bank, Willows Business Park, Kings Lynn

I write further to Will Jeffery's letter of 7 October 2025 (the "Letter"). Unless otherwise stated, terms defined in the Letter have the same meaning in this letter. As explained at paragraph 3.3 of the Letter, a return hearing in respect of the Order obtained on 3 October 2025 was listed for 24 October 2025, at which the

...

RWE Generation UK plc
Trigonos
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB
T +44(0)1793 87 77 77
F +44(0)1793 49 15 86
I www.rwe.com
Registered Office:
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB
Registered in England
and Wales no. 03892782



Page 2

Court would decide whether the injunction granted by the Order should remain in place, be varied, or be withdrawn.

I write to confirm that the return hearing took place on 24 October 2025 and the Court decided that the injunction granted by the Order should remain in force as against Persons Unknown, by making a further order (the "Further Order").

Paragraph 13 of the Further Order requires RWE, by no later than 5.00 pm on 31 October 2025, to notify the owners of the areas of land shown hatched blue on Plans 1A, 2A, 4A, 5A and 6A at Annexure 2 to the Particulars of Claim dated 1 October 2025 (the "Particulars") of the Further Order.

You are the leasehold owner of the Little Barford Power Station (being part of the land hatched blue on Plan 4A of the Particulars) under the Little Barford Lease, and of the Great Yarmouth Power Station (being part of the land hatched blue on Plan 5A of the Particulars) under the Great Yarmouth Leases. You are also the registered freehold proprietor of the Kings Lynn Freehold Interest in the Kings Lynn Power Station (being part of the land hatched blue on Plan 6A of the Particulars). Accordingly, please treat this letter as formal notification of the injunction in accordance with paragraph 13 of the Further Order.

Warning Notices and copies of the Further Order will be displayed at prominent locations around the perimeter of all affected power stations. Please ensure that your employees and visitors are made aware of the terms of the Further Order and the consequences of any breach, so as to avoid inadvertent non-compliance.

If you require any further information in respect of the injunction, please contact me at Rachel.smith@rwe.com. Copies of other relevant documents can be downloaded from the following website: <https://uk.rwe.com/injunction>.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Rachel Smith', is written over a horizontal line.

Rachel Smith (Mrs)
Senior Solicitor

Enc



By Special delivery and first class post

National Gas Transmission PLC
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Our ref.
Contact
Phone
Email

29 October 2025

URGENT: THIS LETTER CONCERNS AN INJUNCTION. YOU SHOULD READ IT CAREFULLY.

Staythorpe Power Station: Staythorpe Power Station, Staythorpe Newark, NG23 5RQ

Staythorpe Lease: Leasehold interest registered with HM Land Registry under title reference NT372031, being a lease dated 1 July 2001 and made between (1) Innogy PLC and (2) Transco PLC

Didcot Power Station: Didcot Power Station, Didcot, Oxfordshire OX11 7YU

Didcot Lease: Leasehold interest registered with HM Land Registry under title reference ON194931, being a lease dated 13 January 1997 and made between (1) National Power PLC and (2) British Gas PLC

Kings Lynn Power Station: Kings Lynn Power Station, Kings Lynn PE34 3RD

Kings Lynn Lease: Leasehold interest registered with HM Land Registry under title reference NK179596, being a lease dated 8 April 1995 and made between (1) Anglian Power Generators Limited and (2) British Gas PLC

I write further to Will Jeffery's letter of 7 October 2025 (the "Letter"). Unless otherwise stated, terms defined in the Letter have the same meaning in this letter. As explained at paragraph 3.3 of the Letter, a return hearing in respect of the Order obtained on 3 October 2025 was listed for 24 October 2025, at which the Court would decide whether the injunction granted by the Order should remain in place, be varied, or be withdrawn.

I write to confirm that the return hearing took place on 24 October 2025 and the Court decided that the injunction granted by the Order should remain in force as against Persons Unknown, by making a further order (the "Further Order"). Paragraph 13 of the Further Order requires RWE, by no later than 5.00 pm on 31 October 2025, to notify the owners of the areas of land shown hatched blue on

RWE Generation UK plc

Trigonos
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

T +44(0)1793 87 77 77
F +44(0)1793 49 15 86
I www.rwe.com

Registered Office:
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

Registered in England
and Wales no. 03892782

...



Page 2

Plans 1A, 2A, 4A, 5A and 6A at Annexure 2 to the Particulars of Claim dated 1 October 2025 (the "Particulars") of the Further Order.

You are the leasehold owner of the Staythorpe Power Station (being part the land hatched blue on Plan 1A of the Particulars) under the Staythorpe Lease, the Didcot Power Station (being part of the land hatched blue on Plan 2A of the Particulars) under the Didcot Lease, and the Kings Lynn Power Station (being part of the land hatched blue on Plan 6A of the Particulars) under the Kings Lynn Lease.

Accordingly, please treat this letter as formal notification of the injunction in accordance with paragraph 13 of the Further Order.

Warning Notices and copies of the Further Order will be displayed at prominent locations around the perimeter of all affected power stations. Please ensure that your employees and visitors are made aware of the terms of the Further Order and the consequences of any breach, so as to avoid inadvertent non-compliance.

I enclose a copy of the Further Order for your information.

If you require any further information in respect of the injunction, please contact me at Rachel.smith@rwe.com. Copies of other relevant documents can be downloaded from the following website: <https://uk.rwe.com/injunction>.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Rachel Smith', is written over a faint blue line.

Rachel Smith (Mrs)
Senior Solicitor

Enc



By first class post, special delivery and e mail to Joanno Lobo
National Grid Electricity Transmission PLC
1 - 3 Strand
London
WC2N 5EH

Our ref.
Contact
Phone
Email

29 October 2025

Dear Directors,

URGENT: THIS LETTER CONCERNS AN INJUNCTION. YOU SHOULD READ IT CAREFULLY.

Staythorpe Power Station: Staythorpe Power Station, Staythorpe, Newark NG23 5RQ

Staythorpe Lease: Leasehold interest registered with HM Land Registry under title reference NT409895, being a lease dated 11 August 2003 and made between (1) Innogy PLC and (2) Transco PLC

Didcot Power Station: Didcot Power Station, Didcot, Oxfordshire OX11 7YU

Didcot Lease: Leasehold interest registered with HM Land Registry under title reference ON191378, being a lease dated 31 March 1990 and made between (1) National Power PLC and (2) The National Grid Company PLC

Second Didcot Lease: Leasehold interest registered with HM Land Registry under title reference ON297164, being a lease dated 14 April 2011 and made between (1) RWE Npower PLC and (2) National Grid Electricity Transmission PLC
(the Didcot Lease together with the Second Didcot Lease, the "Didcot Leases")

I write further to Will Jeffery's letter of 7 October 2025 (the "Letter"), and to previous correspondence in this matter. Unless otherwise stated, terms defined in the Letter have the same meaning in this letter.

As explained at paragraph 3.3 of the Letter, a return hearing in respect of the Order obtained on 3 October 2025 was listed for 24 October 2025, at which the Court would decide whether the injunction granted by the Order should remain in place, be varied, or be withdrawn.

I write to confirm that the return hearing took place on 24 October 2025 and the Court decided that the injunction granted by the Order should remain in force as against Persons Unknown, by making a further order (the "Further Order").

RWE Generation UK plc

Trigonos
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

T +44(0)1793 87 77 77
F +44(0)1793 49 15 86
I www.rwe.com

Registered Office:
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

Registered in England
and Wales no. 03892782

...



Page 2

Paragraph 13 of the Further Order requires RWE, by no later than 5.00 pm on 31 October 2025, to notify the owners of the areas of land shown hatched blue on Plans 1A, 2A, 4A, 5A and 6A at Annexure 2 to the Particulars of Claim dated 1 October 2025 (the "Particulars") of the Further Order.

You are the leasehold owner of the Staythorpe Power Station (being part of the land hatched blue on Plan 1A of the Particulars) under the Staythorpe Lease, and of the Didcot Power Station (being part of the land hatched blue on Plan 2A of the Particulars) under the Didcot Leases.

Accordingly, please treat this letter as formal notification of the injunction in accordance with paragraph 13 of the Further Order.

Warning Notices and copies of the Further Order will be displayed at prominent locations around the perimeter of all affected power stations. Please ensure that your employees and visitors are made aware of the terms of the Further Order and the consequences of any breach, so as to avoid inadvertent non-compliance.

I enclose a copy of the Further Order for your information.

If you require any further information in respect of the injunction, please contact me at Rachel.smith@rwe.com . Copies of other relevant documents can be downloaded from the following website: <https://uk.rwe.com/injunction>.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Rachel Smith', is written over a horizontal line.

Rachel Smith (Mrs)
Senior Solicitor

Enc

From: Joanna Lobo <Joanna.Lobo@nationalgrid.com>
Sent: 03 November 2025 10:05
To: Smith, Rachel
Subject: [EXT] RE: [EXTERNAL] RWE Injunction

Good morning, Rachel

I acknowledge receipt of the renewed injunction and note the contents which I will bring to the attention of relevant colleagues. It is good to see that you have a longer term order.

Regards

Jo

Joanna Lobo

Senior Lawyer- Disputes, Health, Safety & Environment
General Counsel Function SHE Lead
nationalgrid

+44 (0)7769 163624

joanna.lobo@nationalgrid.com

Pronouns: she/her/hers

National Grid House, Floor B3, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA

nationalgrid.com | [Twitter](#) | [LinkedIn](#)



From: Smith, Rachel <Rachel.Smith@rwe.com>
Sent: 29 October 2025 10:56

To: Joanna Lobo <Joanna.Lobo@nationalgrid.com>

Subject: RE: [EXTERNAL] RWE Injunction

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Hello Joanna.

As anticipated the return hearing in relation to our injunction took place on Friday 24th October. Further details are set out in the letter attached along with a copy of the order.

If you need any further information please let me know.

Regards

Rachel Smith
Senior Solicitor
RWE Generation UK plc
Legal Department
Windmill Hill Business Park Whitehill Way Swindon SN5 6PB
Telephone: +44 (0)7989 493817

Mail to: rachel.smith@rwe.com

Please consider the environment before printing this email.

From: Joanna Lobo <Joanna.Lobo@nationalgrid.com>

Sent: 09 October 2025 12:44

To: Smith, Rachel <Rachel.Smith@rwe.com>

Subject: [EXT] RE: [EXTERNAL] RWE Injunction

[EXTERNAL SENDER **]:**

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[EXTERNER ABSENDER **]:**

Klicken Sie nicht auf Links, öffnen Sie keine Anhänge und geben Sie Ihre ID/Ihr Kennwort nur dann ein, wenn Sie den Absender erkennen und sicher sind, dass der Inhalt sicher ist. Wenn Ihnen etwas verdächtig vorkommt, melden Sie es. Beachten Sie Folgendes, bevor Sie Maßnahmen ergreifen: Hatten Sie diese E-Mail erwartet? Können Sie den Absender verifizieren? Sind Grammatik und Rechtschreibung korrekt? Ergibt der Inhalt oder die Aufforderung einen Sinn?

Hi Rachel

I acknowledge receipt of your letter dated 7 October 2025 and the documentation concerning the High Court injunction granted to RWE on 3 October 2025 in relation to six operational power station sites, including Staythorpe Power Station and Didcot Power Station, where National Grid Electricity Transmission PLC holds leasehold interests.

We note the terms of the injunction and the requirement to notify all parties with a property interest in the affected areas. We further acknowledge the upcoming return hearing scheduled for 24 October 2025, and the obligation to ensure that employees and visitors are made aware of the Order and its implications. I have been liaising with our security, operational and corporate affairs teams who have been informed about the injunction and its scope.

I do not currently envisage it, but we are considering any need for our attendance at the hearing and will advise in due course if we intend to make representations.

If you need any further information or coordination with us, please do not hesitate to contact me.

Jo

Joanna Lobo

Senior Lawyer- Disputes, Health, Safety & Environment
General Counsel Function SHE Lead
nationalgrid

+44 (0)7769 163624

joanna.lobo@nationalgrid.com

Pronouns: she/her/hers

National Grid House, Floor B3, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA

[nationalgrid.com](https://www.nationalgrid.com) | [Twitter](#) | [LinkedIn](#)



From: Smith, Rachel <Rachel.Smith@rwe.com>
Sent: 07 October 2025 12:37
To: Joanna Lobo <Joanna.Lobo@nationalgrid.com>
Subject: [EXTERNAL] RWE Injunction - as discussed

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Hi Joanna

I hope you managed to clear the brambles.

As I mentioned on the phone RWE has recently obtained an injunction and due to the practicalities of some of the sites and the fences it includes some areas leased to NGET.

There are full details in the letter attached, the hard copy of which is being served by hand today on your registered office in order that we comply with the provisions of the order.

If you need any further information please let me know and I would be more than happy to assist.

Regards

Rachel Smith
Senior Solicitor
RWE Generation UK plc
Legal Department
Windmill Hill Business Park Whitehill Way Swindon SN5 6PB
Telephone: +44 (0)7989 493817

Mail to: rachel.smith@rwe.com

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Please ensure you have adequate virus protection before you open or detach any documents from this transmission. National Grid plc and its affiliates do not accept any liability for viruses. An e-mail reply to this address may be subject to monitoring for operational reasons or lawful business practices.

For the registered information on the UK operating companies within the National Grid group please use the attached link: <https://www.nationalgrid.com/group/about-us/corporate-registrations>

Sophie Abbott

From: sophie.abbott@osborneclarke.com
Subject: FW: OE-1237 | [EXT] Staythorpe et al - injunction [OC-OC_UK.FID8569336]

From: Redaktion <redaktion@rwe.com>
Sent: 27 July 2026 09:37
To: Sophie Abbott <sophie.abbott@osborneclarke.com>; Redaktion <redaktion@rwe.com>; Rees, Michael <Michael.Rees@rwe.com>; Nye, Kelly <Kelly.Nye@rwe.com>; Phillips, David <David.Phillips@rwe.com>; Jeffery, Will <Will.Jeffery@rwe.com>
Cc: Gasparini, Adriana <Adriana.Gasparini@rwe.com>; Smith, Rachel <Rachel.Smith@rwe.com>; Carl Roche <carl.roche@osborneclarke.com>; Donal Kelly <Donal.Kelly@osborneclarke.com>
Subject: AW: OE-1237 | [EXT] Staythorpe et al - injunction [OC-OC_UK.FID8569336]

** EXTERNAL EMAIL **

-NOT ENCRYPTED-

Hi Sophie,

It's online now:
<https://uk.rwe.com/injunction/>

Best Regards

André Daniel Gröning

Online-Redaktion
Externer Mitarbeiter der RWE Power AG

Mobil: 0173 - 1932791
andre.groening.extern@rwe.com

UP! onlineagentur
Zindelstraße 12
45128 Essen
www.up-onlineagentur.de

 [up! bei LinkedIn](#)

Von: Sophie Abbott <sophie.abbott@osborneclarke.com>
Gesendet: Montag, 27. Juli 2026 10:32
An: Redaktion <redaktion@rwe.com>; Rees, Michael <Michael.Rees@rwe.com>; Nye, Kelly <Kelly.Nye@rwe.com>; Phillips, David <David.Phillips@rwe.com>; Jeffery, Will <Will.Jeffery@rwe.com>
Cc: Gasparini, Adriana <Adriana.Gasparini@rwe.com>; Smith, Rachel <Rachel.Smith@rwe.com>; Carl Roche <carl.roche@osborneclarke.com>; Donal Kelly <Donal.Kelly@osborneclarke.com>
Betreff: RE: OE-1237 | [EXT] Staythorpe et al - injunction [OC-OC_UK.FID8569336]

Hi André

Thank you. This looks good. Please could you now make the website live and confirm once done.

Kind regards

Sophie

Sophie Abbott
Senior Associate
for Osborne Clarke LLP
osborneclarke.com

.....
E sophie.abbott@osborneclarke.com

T +44 207 105 7762

One London Wall, London EC2Y 5EB
.....

From: Redaktion <redaktion@rwe.com>

Sent: 27 July 2026 08:45

To: Sophie Abbott <sophie.abbott@osborneclarke.com>; Redaktion <redaktion@rwe.com>; Rees, Michael <Michael.Rees@rwe.com>; Nye, Kelly <Kelly.Nye@rwe.com>; Phillips, David <David.Phillips@rwe.com>; Jeffery, Will <Will.Jeffery@rwe.com>

Cc: Gasparini, Adriana <Adriana.Gasparini@rwe.com>; Smith, Rachel <Rachel.Smith@rwe.com>; Carl Roche <carl.roche@osborneclarke.com>; Donal Kelly <Donal.Kelly@osborneclarke.com>

Subject: AW: OE-1237 | [EXT] RE: Staythorpe et al - injunction

-NOT ENCRYPTED-

Hi Sophie,

Unfortunately it is only possible to view the preview links from the RWE network.

Please have a look at the screenshot in the attachment instead.

Best Regards

André Daniel Gröning

Online-Redaktion
Externer Mitarbeiter der RWE Power AG

Mobil: 0173 - 1932791

andre.groening.extern@rwe.com

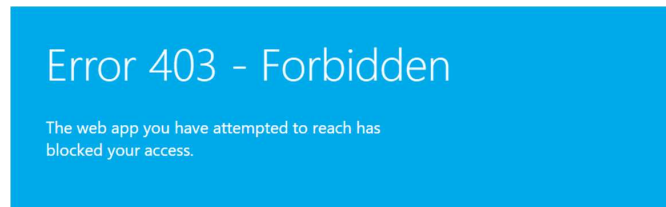
UP! onlineagentur
Zindelstraße 12
45128 Essen
www.up-onlineagentur.de

 [up! bei LinkedIn](#)

Von: Sophie Abbott <sophie.abbott@osborneclarke.com>
Gesendet: Montag, 27. Juli 2026 09:33
An: Redaktion <redaktion@rwe.com>; Rees, Michael <Michael.Rees@rwe.com>; Nye, Kelly <Kelly.Nye@rwe.com>;
Phillips, David <David.Phillips@rwe.com>; Jeffery, Will <Will.Jeffery@rwe.com>
Cc: Gasparini, Adriana <Adriana.Gasparini@rwe.com>; Smith, Rachel <Rachel.Smith@rwe.com>; Carl Roche
<carl.roche@osborneclarke.com>; Donal Kelly <Donal.Kelly@osborneclarke.com>
Betreff: RE: OE-1237 | [EXT] RE: Staythorpe et al - injunction

Hi André, all

Thank you for the below and for your assistance. We are unable to access the link to check the preview – please see below the error message when we click on the link. Please could you kindly re-send?



Kind regards

Sophie

Sophie Abbott
Senior Associate
for Osborne Clarke LLP
osborneclarke.com

.....
E sophie.abbott@osborneclarke.com

T +44 207 105 7762

One London Wall, London EC2Y 5EB
.....

From: Redaktion <redaktion@rwe.com>
Sent: 27 July 2026 07:30
To: Sophie Abbott <sophie.abbott@osborneclarke.com>; Rees, Michael <Michael.Rees@rwe.com>; Nye, Kelly
<Kelly.Nye@rwe.com>; Phillips, David <David.Phillips@rwe.com>; Jeffery, Will <Will.Jeffery@rwe.com>
Cc: Gasparini, Adriana <Adriana.Gasparini@rwe.com>; Smith, Rachel <Rachel.Smith@rwe.com>; Carl Roche
<carl.roche@osborneclarke.com>; Donal Kelly <Donal.Kelly@osborneclarke.com>; Redaktion <redaktion@rwe.com>
Subject: AW: OE-1237 | [EXT] RE: Staythorpe et al - injunction [OC-OC_UK.FID8569336]

-NOT ENCRYPTED-

Hello together,

I've prepared the changes. Please have a look at the preview:
<https://prod-cm-uk-internet.rwe.com/injunction/>

Best Regards

André Daniel Gröning

Online-Redaktion
Externer Mitarbeiter der RWE Power AG

Mobil: 0173 - 1932791
andre.groening.extern@rwe.com

UP! onlineagentur
Zindelstraße 12
45128 Essen
www.up-onlineagentur.de



Von: Sophie Abbott <sophie.abbott@osborneclarke.com>
Gesendet: Samstag, 25. Juli 2026 15:08
An: Rees, Michael <Michael.Rees@rwe.com>; Nye, Kelly <Kelly.Nye@rwe.com>; Phillips, David <David.Phillips@rwe.com>; Jeffery, Will <Will.Jeffery@rwe.com>; Redaktion <redaktion@rwe.com>
Cc: Gasparini, Adriana <Adriana.Gasparini@rwe.com>; Smith, Rachel <Rachel.Smith@rwe.com>; Carl Roche <carl.roche@osborneclarke.com>; Donal Kelly <Donal.Kelly@osborneclarke.com>
Betreff: OE-1237 | [EXT] RE: Staythorpe et al - injunction [OC-OC_UK.FID8569336]

Hi all

Thanks, Mike.

@Redaktion / @Nye, Kelly / @Phillips, David / @Jeffery, Will – We need to update the current wording on the website, so that it now includes the wording shown **highlighted** below. Once you have carried out the update, please could you send us the "offline" version of the updated website, so we can check all is in order before it goes live. To be clear, the highlighting should be removed (we have added it so that you can easily identify the new wording). We also attach the two new documents referred to.

Following recent trespass at one of its operational power stations, RWE Generation UK plc (RWE) has secured an injunction in the High Court of England and Wales in order to protect six of its major gas generating sites:

- Staythorpe,
- Pembroke,
- Didcot B,
- Little Barford,
- Great Yarmouth and
- Kings Lynn power stations.

*Gas generation is key in providing security of supply in the UK and the safe and continuing operation of these gas generating sites is therefore paramount. An interim injunction was granted by the High Court on the 3rd of October and upheld on 24 October 2025. At present, the injunction is scheduled to continue until 24 October 2026 and will protect those sites against trespassers as well as ensuring the safety of our operational staff. **RWE applied on 17 July 2026 to extend the injunction for a period of 12 months, from and including 24 October 2026.***

For further detail, please see the Injunction Documents.

Interim Injunctive Relief: Ex-Parte Hearing Documents

- Claim Form
- Particulars of Claim
- Application Notice (First Hearing)
- Skeleton Argument
- Interim Injunction Order
- Note of the Hearing

Continuation of Interim Injunctive Relief: Return Hearing Documents

- *Application Notice (Return Hearing)*
- *Hearing Bundle*
- *Continuation of the Interim Injunction Order*
- *Note of the Return Hearing*

Application to Extend: Application Documents

- *Application Notice (Application to Extend)*
- *Endorsed Application Notice (Application to Extend)*

Kind regards

Sophie

Sophie Abbott
Senior Associate
for Osborne Clarke LLP
osborneclarke.com

.....
E sophie.abbott@osborneclarke.com
T +44 207 105 7762
One London Wall, London EC2Y 5EB
.....

□□□□□□□□□□



To: PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

18 August 2026

Claim: PT-2025-001017 – RWE Generation UK PLC v (1) Persons Unknown, (2) Greenpeace UK Limited and (3) Greenpeace Limited

Osborne Clarke LLP acts on behalf of RWE Generation UK PLC, the Claimant in the above Claim.

By orders of the Court dated 3 and 24 October 2025, the Claimant obtained an interim injunction (the **"Injunction"**) against the First Defendant (Persons Unknown), in relation to land at:

1. Staythorpe Power Station, Staythorpe, Newark, NG23 5PS;
2. Didcot Power Station, Didcot, Oxfordshire, OX11 7YU;
3. Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS;
4. Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT;
5. Great Yarmouth Power Station, South Denes Road, Great Yarmouth, NR30 3PY; and
6. Kings Lynn Power Station, Kings Lynn, PE34 3RD

(each a **"Site"** and together, the **"Sites"**).

On 17 July 2026 the Claimant applied to extend the Injunction for a period of 12 months, from and including 24 October 2026 (the **"Application to Extend"**). The Application to Extend has been listed for hearing in a 3 day window from **19 October 2026** with a time estimate of half a day. Please see the Notice of Hearing for further information on the precise listing of the hearing.

Copies of all relevant documents relating to the Application to Extend are available:

1. To view and download at <https://uk.rwe.com/injunction/>; and
2. To view in hard copy, at the gatehouse of each Site, the location of which are shown shaded in blue on the enclosed Site Maps.

Osborne Clarke LLP

One London Wall, London, EC2Y 5EB T +44 207 105 7000 F +44 207 105 7005

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osborneclarke.com

Documents will be made available within a reasonable time after being produced.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Osborne Clarke LLP'.

Osborne Clarke LLP

E injunctions@osborneclarke.com, donal.kelly@osborneclarke.com and
carl.roche@osborneclarke.com

Enc. – Site Maps

N244

Application notice

Take notice that an appointment to fix a date for the Application has been made for 11:00AM on 30th July 2026
Please note this is a deadline to file your dates to avoid. Please send through your dates to avoid via email to chanceryjudgeslisting@justice.gov.uk by 11:00AM on 30th July 2026
If you wish to attend in person to discuss and list this matter, please email the listing officers at chanceryjudgeslisting@justice.gov.uk confirming when yourself and the other party representatives intend to attend the list office.
If attendance is confirmed please attend at:
COUNTER 9, GROUND FLOOR, THE ROLLS BUILDING, 7 ROLLS BUILDINGS, LONDON, EC4A 1NL.
Please provide dates to avoid/of availability within the specified hearing window <https://www.gov.uk/guidance/trial-date-windows-for-chancery-division>. Failing availability being given a date will not be supplied and parties will be required to contact the office for a further appointment.
NB: This is not a Judicial hearing and is only to arrange a hearing date.

Name of court High Court of Justice (ChD)	Claim no. PT-2025-001017
Fee account no. (if applicable) PBA0080949	Help with Fees - Ref. no. (if applicable) 17 Jul 2026
Warrant no. (if applicable)	H W F - [] - []
Claimant's name (including ref.) RWE GENERATION UK PLC (Ref: DKA/10002880)	
Defendant's name (including ref.) See Schedule 1	
Date	17 July 2026

1. What is your name or, if you are a legal representative, the name of your firm?

Osborne Clarke LLP

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent?

Claimant

3. What order are you asking the court to make and why?

Pursuant to paragraph 3 of the order of the Honourable Mr Justice Trower dated 24/10/25 (the "Order"), the Claimant applies for a review hearing of the injunction set out at paragraphs 1 and 2 of the Order, to be listed on or before 24/10/26. The Claimant's evidence in support of this application will follow in due course, in accordance with paragraph 3 of the Order. A draft order will also follow in due course.

4. Have you attached a draft of the order you are applying for? ☐ Yes ☒ No

5. How do you want to have this application dealt with? ☒ at a hearing ☐ without a hearing
☐ at a remote hearing

6. How long do you think the hearing will last? Hours Minutes

Is this time estimate agreed by all parties? ☒ Yes ☐ No

7. Give details of any fixed trial date or period

Review hearing on or before 24/10/2026

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

Notification on the First Defendant and service on the Second and Third Defendants (see 9a below).

- 9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

The Claimant shall notify the First Defendant of the Application Notice in accordance with paragraph 6 of the Order and shall serve the Application Notice on the Second and Third Defendants in accordance with paragraphs 10 and 11 of the Order.

10. What information will 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

If necessary, please continue on a separate sheet.

Witness evidence shall follow in due course and at least 14 days before the review hearing, in accordance with paragraph 3 of the Order.

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



- ☐ 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
17	07	2026

Full name

Donal Patrick Kelly

Name of applicant's legal representative's firm

Osborne Clarke LLP

If signing on behalf of firm or company give position or office held

Legal Director

Applicant's address to which documents should be sent.

Building and street

One London Wall

Second line of address

Town or city

London

County (optional)

Postcode

E	C	2	Y	5	E	B
---	---	---	---	---	---	---

If applicable

Phone number

0207 105 7330

Fax phone number

DX number

Your Ref.

DKA/10002880

Email

donal.kelly@osborneclarke.com; carl.roche@osborneclarke.com;
sophie.abbott@osborneclarke.com

Schedule 1

Defendants' names:

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED (Company registration number 02463348)

(3) GREENPEACE LIMITED (Company registration number 01314381)



HM Courts & Tribunals Service

HM Courts & Tribunal Service
Business and Property Courts of
England and Wales
Rolls Building
7 Rolls Buildings
London
EC4A 1NL
DX 160040 Strand 4
T 020 7947 6690
Email :
chanceryjudgeslisting@justice.gov.uk
www.justice.gov.uk

Copy of notice emailed to the following
injunctions@osborneclarke.com
Donal.Kelly@osborneclarke.com
carl.roche@osborneclarke.com
exuk@greenpeace.org
jack.robirosa@greenpeace.org
sophie.abbott@osborneclarke.com

Date 31 July 2026

Case reference: PT-2025-001017

Case Title: RWE Generation UK PLC v Persons Unknown and others

Notice of Application Hearing Date

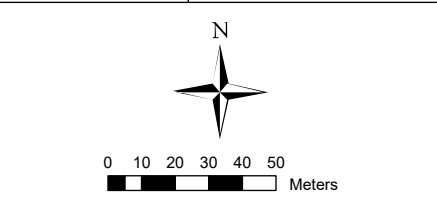
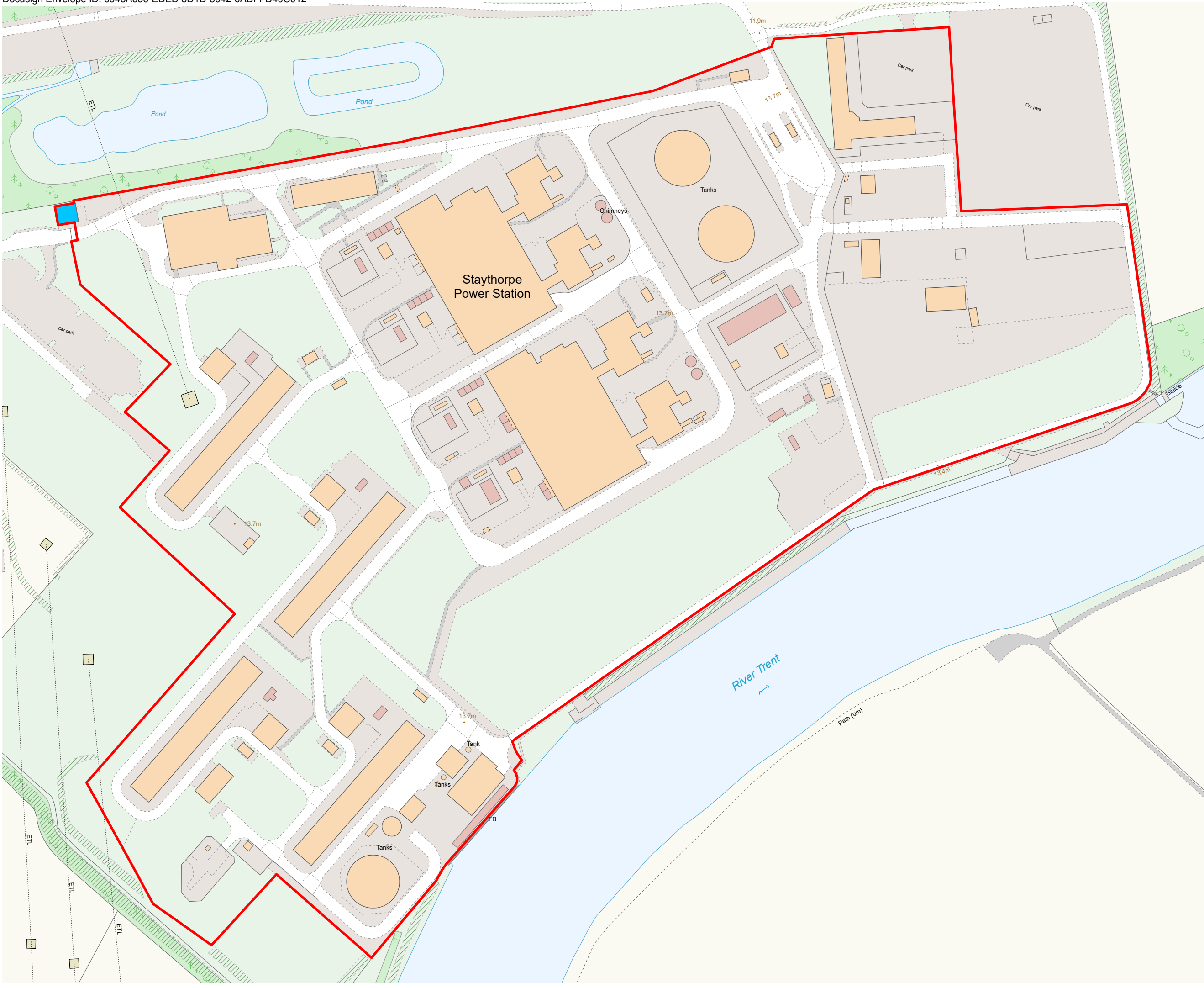
The Claimants application notice dated 17 July 2026 has been listed is in a 3 day window from the 19 October 2026 with a time estimate of half a day.

Information regarding the listing of this case can be found on the Justice website
<https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111> at approximately 2pm on the previous working day.

Yours Faithfully
Mark Quigley,
Chancery Listing Office



INVESTOR IN PEOPLE



- Key:
- Extent of injunction area (2416m)
 - Gatehouse

MJA	RS	17/08/26	RS	A
Drawn	Checked	Date	Approved	Rev.

THE PERSON NAMED IN THE "APPROVED BY" BOX HOLDS RESPONSIBILITY FOR THE TECHNICAL CONTENT OF THIS DRAWING AND SHOULD BE CONSULTED PRIOR TO REQUESTING MODIFICATION.

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RWE RWE Generation UK plc
Geospatial Graphics
RWE Generation UK plc
Windmill Hill Business Park
Swindon
SN5 6PB
01793 877777

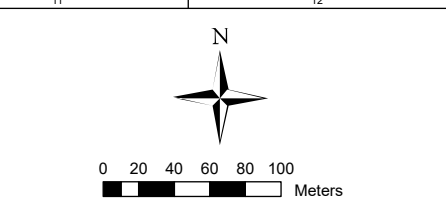
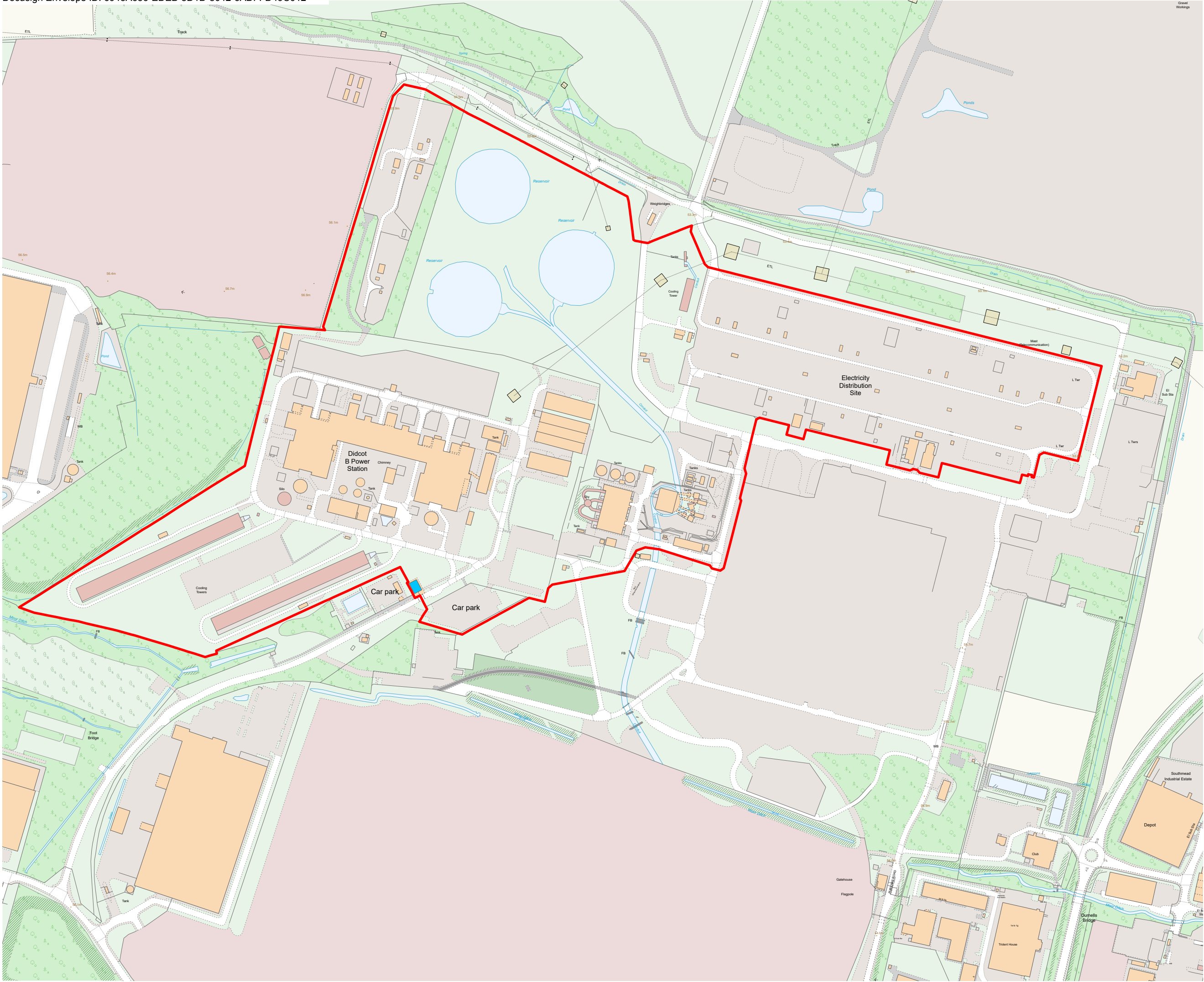
Size of original	Scale of original
A3	1:2,250

Site
STAYTHORPE POWER STATION

Title
**PLAN 1 2026
SITE SECURITY
LOCATION OF
GATEHOUSE
PLAN**

Status
FINAL

Drawing Number
RWE-STYTH/PW/0009/1



- Key:
- Extent of injunction area (3716m)
 - Gatehouse

MJA	RS	17/08/26	RS	A
Drawn	Checked	Date	Approved	Rev.

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Windmill Hill Business Park
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SN5 6PB
01793 877777

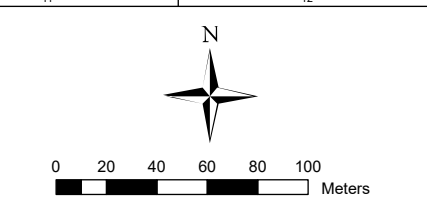
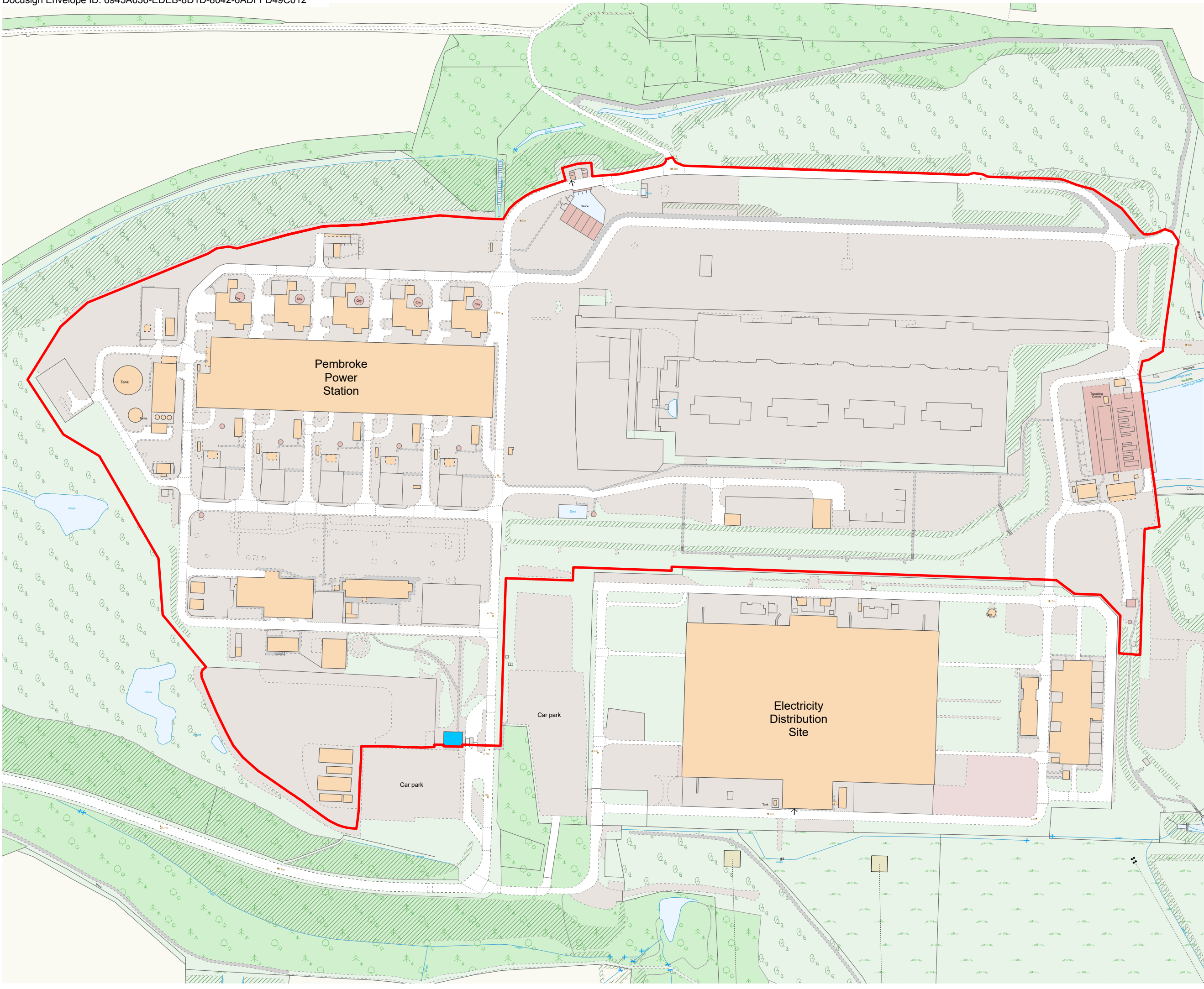
Size of original	Scale of original
A3	1:4,250

Site
**DIDCOT
POWER STATION**

Title
**PLAN 2 2026
SITE SECURITY
LOCATION OF
GATEHOUSE
PLAN**

Status
FINAL

Drawing Number
RWE DIDCOT / MS/0049/



Key:

Extent of injunction area (3059m)

Gatehouse

MJA	RS	17/08/26	RS	A
Drawn	Checked	Date	Approved	Rev.

THE PERSON NAMED IN THE "APPROVED BY" BOX HOLDS RESPONSIBILITY FOR THE TECHNICAL CONTENT OF THIS DRAWING AND SHOULD BE CONSULTED PRIOR TO REQUESTING MODIFICATION.

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RWE RWE Generation UK plc

Geospatial Graphics
RWE Generation UK plc
Windmill Hill Business Park
Swindon
SN5 6PB
01793 877777

Size of original	Scale of original
A3	1:3,000

Site

PEMBROKE
POWER STATION

Title

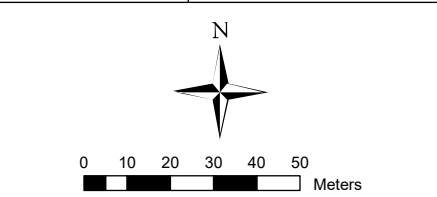
PLAN 3 2026
SITE SECURITY
LOCATION OF
GATEHOUSE
PLAN

Status

FINAL

Drawing Number

RWE/MS/0068/484



- Key:
- Extent of injunction area (2485m)
 - Gatehouse

MJA	RS	17/08/26	RS	A
Drawn	Checked	Date	Approved	Rev.

THE PERSON NAMED IN THE "APPROVED BY" BOX HOLDS RESPONSIBILITY FOR THE TECHNICAL CONTENT OF THIS DRAWING AND SHOULD BE CONSULTED PRIOR TO REQUESTING MODIFICATION.

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RWE RWE Generation UK plc
Geospatial Graphics
RWE Generation UK plc
Windmill Hill Business Park
Swindon
SN5 6PB
01793 877777

Size of original	Scale of original
A3	1:1,750

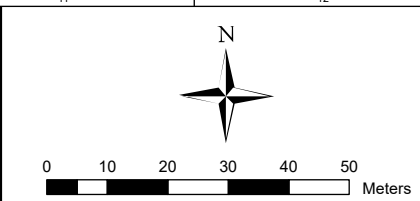
Site
**LITTLE BARFORD
POWER STATION**

Title
**PLAN 4 2026
SITE SECURITY
LOCATION OF
GATEHOUSE
PLAN**

Status
FINAL

Drawing Number
RWE PLT/PR/MS/0008/A





- Key:
- Extent of injunction area (1097m)
 - Gatehouse

MJA	RS	17/08/26	RS	A
Drawn	Checked	Date	Approved	Rev.

THE PERSON NAMED IN THE "APPROVED BY" BOX HOLDS RESPONSIBILITY FOR THE TECHNICAL CONTENT OF THIS DRAWING AND SHOULD BE CONSULTED PRIOR TO REQUESTING MODIFICATION.

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RWE RWE Generation UK plc
Geospatial Graphics
RWE Generation UK plc
Windmill Hill Business Park
Swindon
SN5 6PB
01793 877777

Size of original	Scale of original
A3	1:1,250

Site
KINGS LYNN POWER STATION

Title
**PLAN 6 2026
SITE SECURITY
LOCATION OF
GATEHOUSE
PLAN**

Status
FINAL

Drawing Number

RWE KINGS LYNN 00007/1

Page 335 of 484







WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 24 October 2025 exists relating to the land and premises known as Kings Lynn Power Station, Kings Lynn, PE34 3RD.

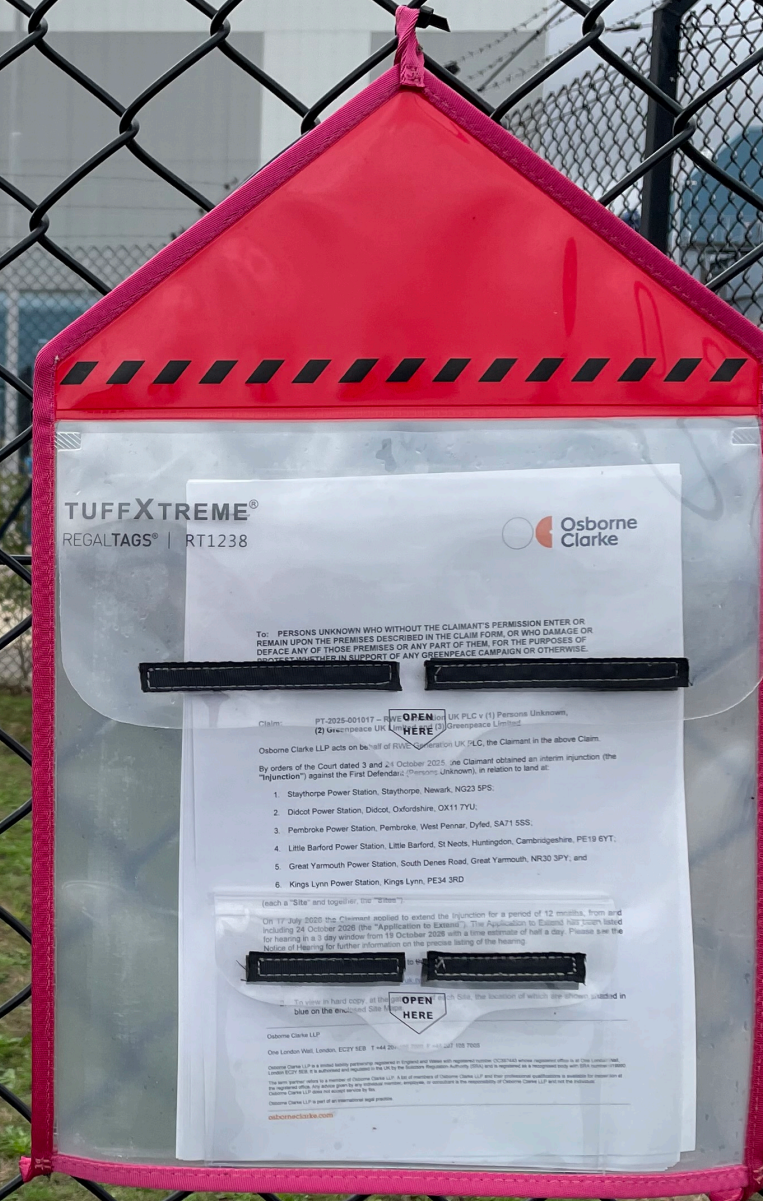
The injunction means you may not:

FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE) OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 6, BEING:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing: injunctions@osborneclarke.com



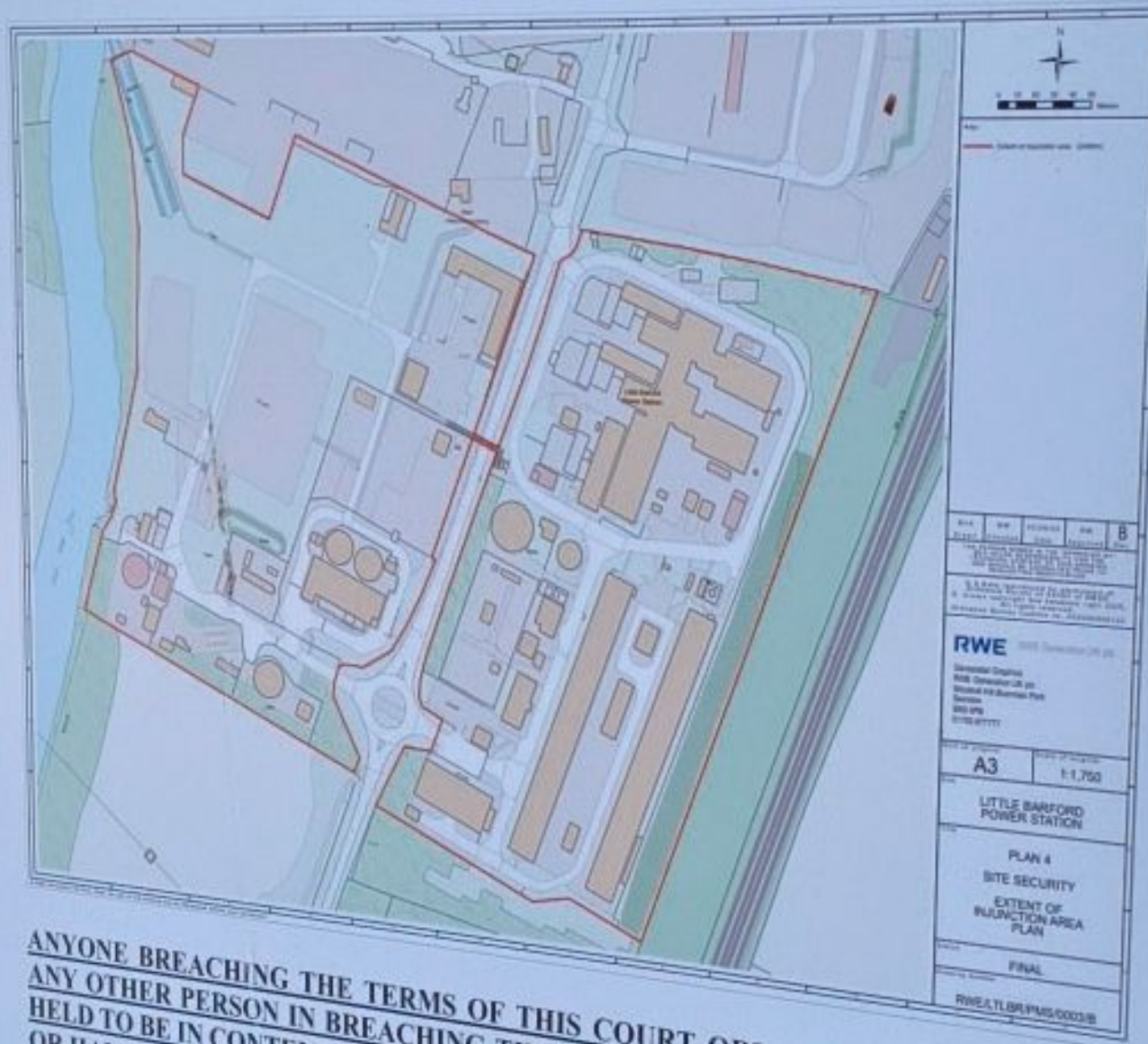


WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 24 October 2025 exists relating to the land and premises known as Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT.

The injunction means you may not:

FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE) OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4, BEING:

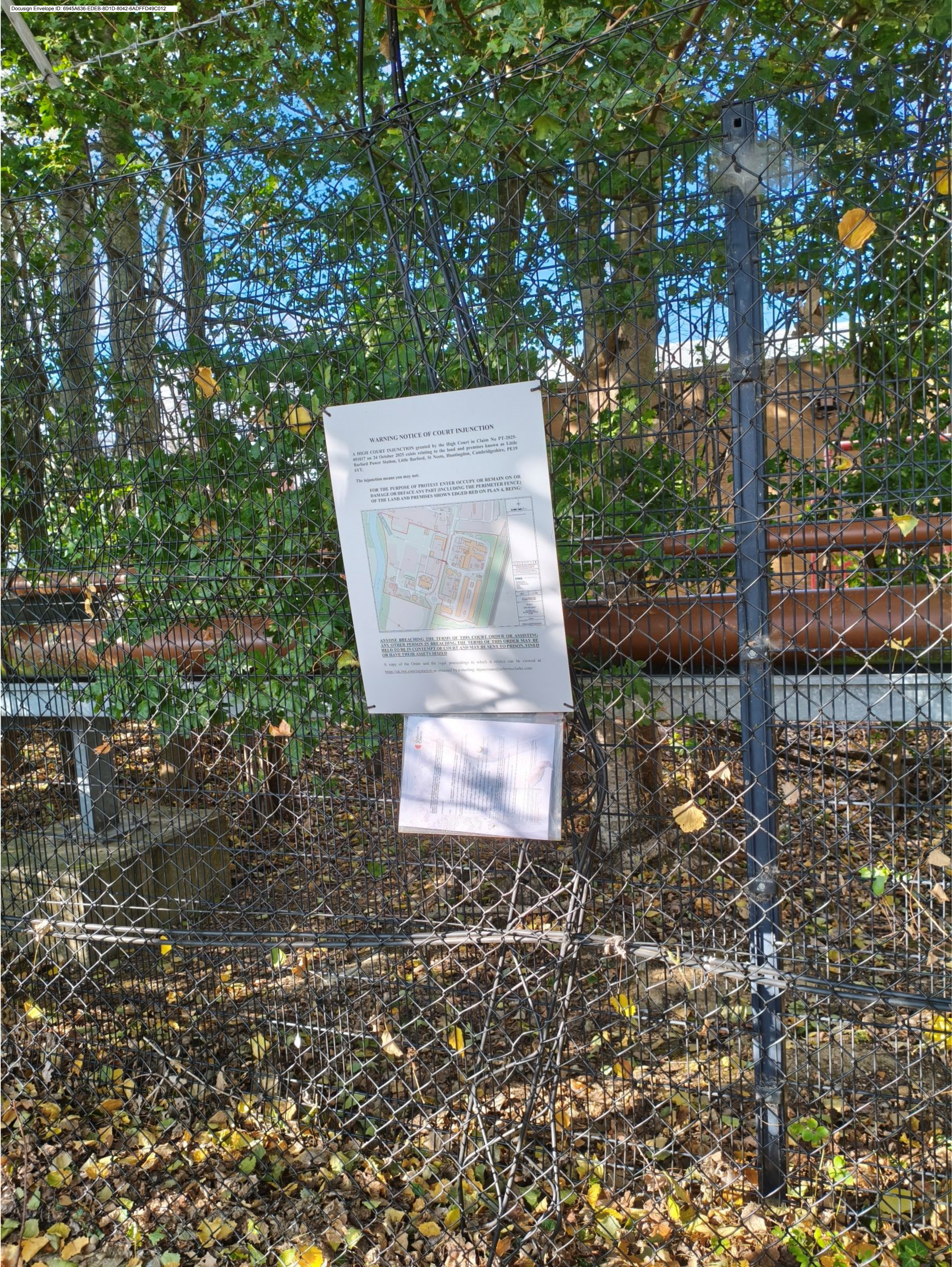


ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing: injunctions@osborneclarke.com







WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 24 October 2025 exists relating to the land and premises known as Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT.

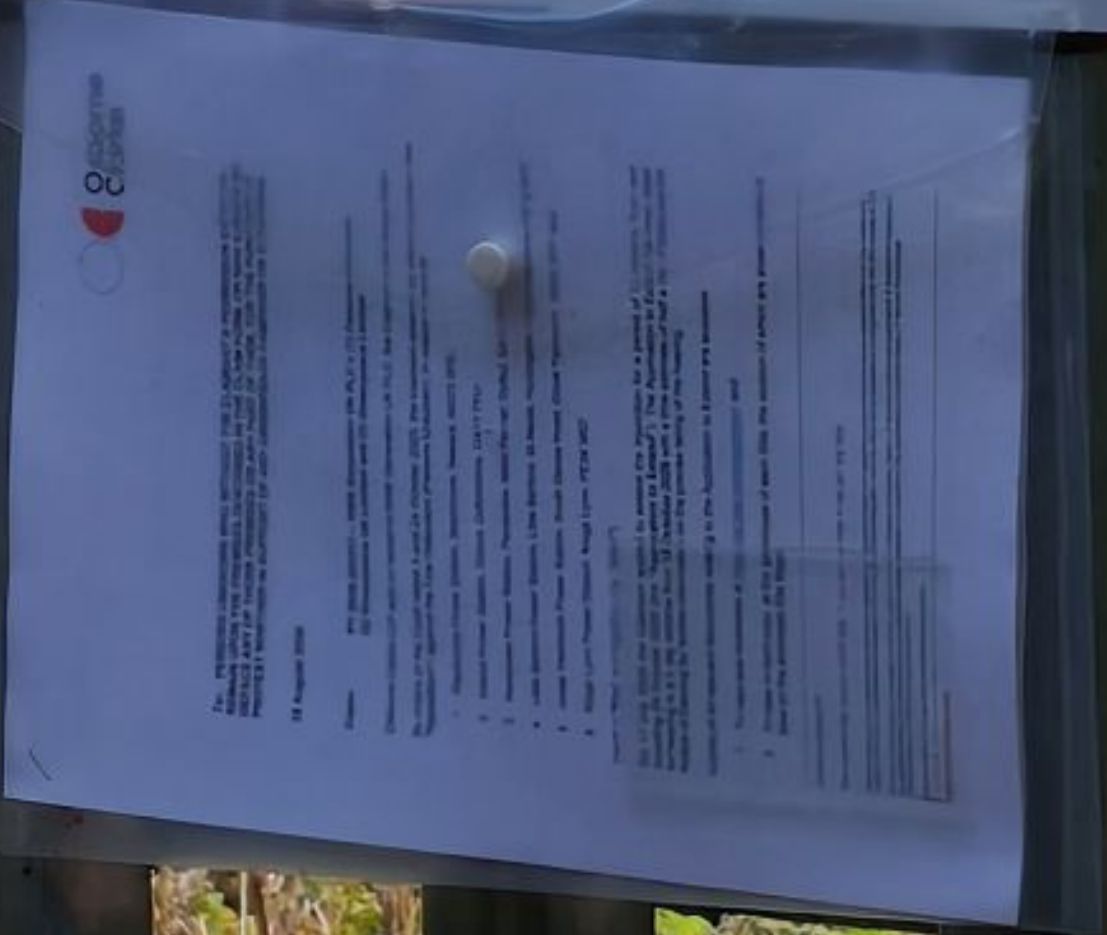
The injunction means you may not:

FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE) OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4, BEING:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing: injunctions@osborneclarke.com





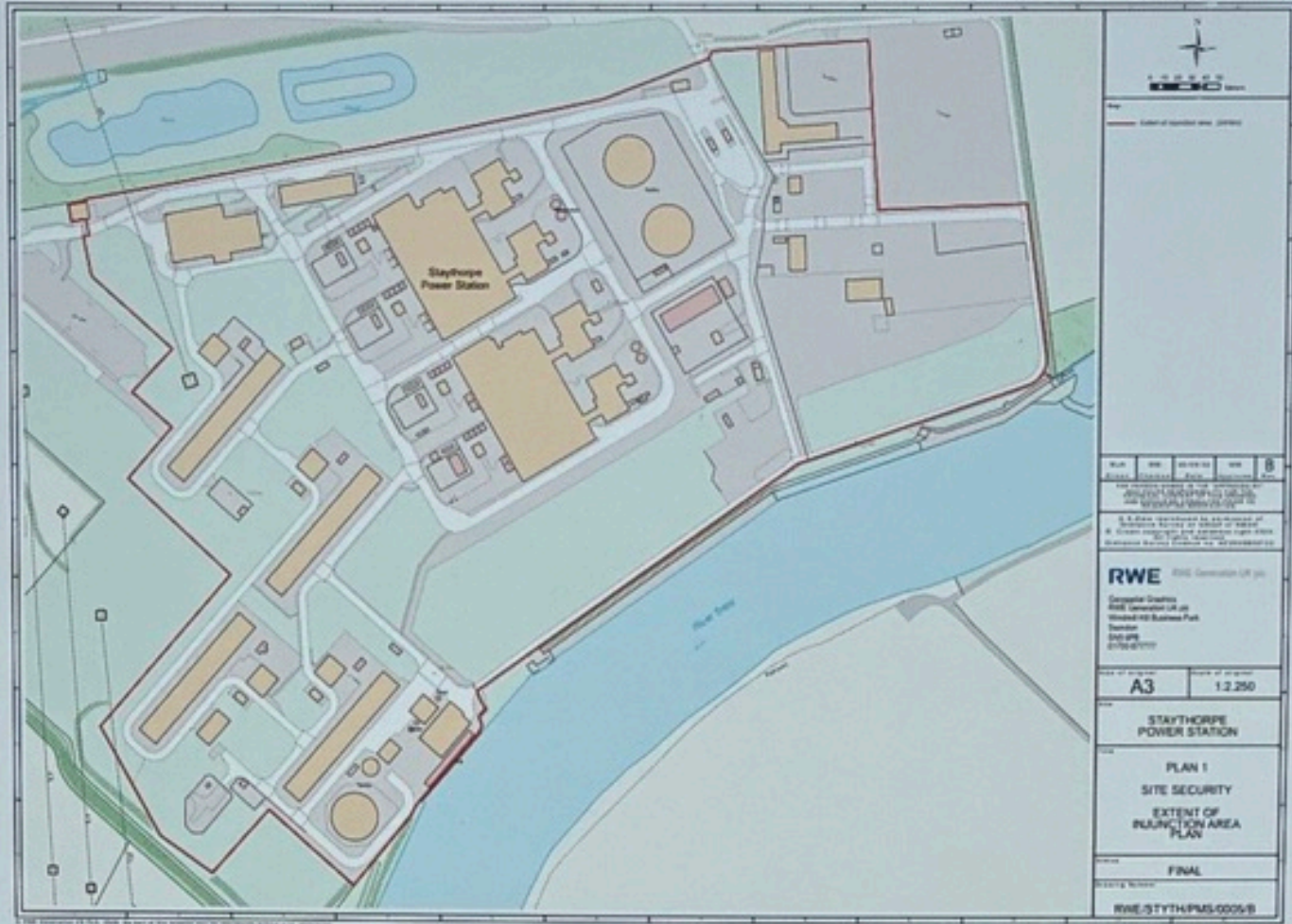


WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 24 October 2025 exists relating to the land and premises known as Staythorpe Power Station, Staythorpe, Newark, NG23 5RQ.

The injunction means you may not:

FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE) OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 1, BEING:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing: injunctions@osborneclarke.com

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Osborne Clarke

To: PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

OPEN HERE

On 17 July 2025 the Claimant applied to extend the Injunction for a period of 12 months, from and including 24 October 2025 (the "Application to Extend"). The Application to Extend has been listed for a 3 day window from 18 October 2025 with a time estimate of half a day. Please see the details of the Application to Extend on the previous page of the hearing.

Copies of all relevant documents relating to the Application to Extend are available at:

1. To view and download at <https://uk.rwe.com/injunction> and
2. To view in hard copy, at the gatehouse of each Site, the location of which are shown shaded in green on the map.

OPEN HERE



From: Pawlett, Mark <Mark.Pawlett@rwe.com>
Sent: 11 September 2026 09:53
To: Phillips, David
Cc: Smith, Rachel
Subject: RE: OE-1237 | [EXT] Staythorpe et al - injunction [OC-OC_UK.FID8569336]

Morning Dave,

Task completed on the 9th September.



Puja Dhevi

From: Injunctions
Sent: 27 July 2026 09:28
To: 'exuk@greenpeace.org'; 'Jack Robirosa'
Cc: Carl Roche; Donal Kelly
Subject: PT-2025-001017 - Application to extend injunction against Persons Unknown - Claimant's dates to avoid [OC-OC_UK.FID8569336]
Attachments: L to Greenpeace - PT-2025-001017 - 27 July 2026(169350759.3).pdf; Endorsed N244 Application notice - PT-2025-001017 (with Schedule 1) - 17 July 2026(169295710.1).pdf

Dear Greenpeace UK Limited and Greenpeace Limited

Please see attached letter and enclosures, for your attention and by way of service.

Yours faithfully

Osborne Clarke LLP

osborneclarke.com

.....

One London Wall, London EC2Y 5EB

.....

N244

Application notice

Take notice that an appointment to fix a date for the Application has been made for 11:00AM on 30th July 2026
Please note this is a deadline to file your dates to avoid. Please send through your dates to avoid via email to chanceryjudgeslisting@justice.gov.uk by 11:00AM on 30th July 2026
If you wish to attend in person to discuss and list this matter, please email the listing officers at chanceryjudgeslisting@justice.gov.uk confirming when yourself and the other party representatives intend to attend the list office.
If attendance is confirmed please attend at:
COUNTER 9, GROUND FLOOR, THE ROLLS BUILDING, 7 ROLLS BUILDINGS, LONDON, EC4A 1NL.
Please provide dates to avoid/of availability within the specified hearing window <https://www.gov.uk/guidance/trial-date-windows-for-chancery-division>. Failing availability being given a date will not be supplied and parties will be required to contact the office for a further appointment.
NB: This is not a Judicial hearing and is only to arrange a hearing date.

Name of court High Court of Justice (ChD)	Claim no. PT-2025-001017
Fee account no. (if applicable) PBA0080949	Help with Fees - Ref. no. (if applicable) 17 Jul 2026
Warrant no. (if applicable)	H W F - [] - []
Claimant's name (including ref.) RWE GENERATION UK PLC (Ref: DKA/10002880)	
Defendant's name (including ref.) See Schedule 1	
Date	17 July 2026

1. What is your name or, if you are a legal representative, the name of your firm?

Osborne Clarke LLP

2. Are you a
- ☐
- Claimant
- ☐
- Defendant
- ☒
- Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent?

Claimant

3. What order are you asking the court to make and why?

Pursuant to paragraph 3 of the order of the Honourable Mr Justice Trower dated 24/10/25 (the "Order"), the Claimant applies for a review hearing of the injunction set out at paragraphs 1 and 2 of the Order, to be listed on or before 24/10/26. The Claimant's evidence in support of this application will follow in due course, in accordance with paragraph 3 of the Order. A draft order will also follow in due course.

4. Have you attached a draft of the order you are applying for?
- ☐
- Yes
- ☒
- No

5. How do you want to have this application dealt with?
- ☒
- at a hearing
- ☐
- without a hearing
-
- ☐
- at a remote hearing

6. How long do you think the hearing will last? 2 Hours 30 Minutes

Is this time estimate agreed by all parties? ☒ Yes ☐ No

7. Give details of any fixed trial date or period

Review hearing on or before 24/10/2026

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

Notification on the First Defendant and service on the Second and Third Defendants (see 9a below).

- 9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

The Claimant shall notify the First Defendant of the Application Notice in accordance with paragraph 6 of the Order and shall serve the Application Notice on the Second and Third Defendants in accordance with paragraphs 10 and 11 of the Order.

10. What information will 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

If necessary, please continue on a separate sheet.

Witness evidence shall follow in due course and at least 14 days before the review hearing, in accordance with paragraph 3 of the Order.

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



- ☐ 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
17	07	2026

Full name

Donal Patrick Kelly

Name of applicant's legal representative's firm

Osborne Clarke LLP

If signing on behalf of firm or company give position or office held

Legal Director

Applicant's address to which documents should be sent.

Building and street

One London Wall

Second line of address

Town or city

London

County (optional)

Postcode

E	C	2	Y	5	E	B
---	---	---	---	---	---	---

If applicable

Phone number

0207 105 7330

Fax phone number

DX number

Your Ref.

DKA/10002880

Email

donal.kelly@osborneclarke.com; carl.roche@osborneclarke.com;
sophie.abbott@osborneclarke.com

Schedule 1

Defendants' names:

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED (Company registration number 02463348)

(3) GREENPEACE LIMITED (Company registration number 01314381)



By Email Only

FAO Jack Robirosa

Greenpeace UK Limited and Greenpeace Limited
Greenpeace House
Canonbury Villas
London
N1 2PN

Email: jack.robirosa@greenpeace.org and exuk@greenpeace.org

Our reference HAS/10002880/O169350759.1/HAS

27 July 2026

Dear Greenpeace UK Limited and Greenpeace Limited

Claim: **PT-2025-001017 – RWE Generation UK PLC v (1) Persons Unknown, (2) Greenpeace UK Limited and (3) Greenpeace Limited**

Greenpeace: **Greenpeace UK Limited and Greenpeace Limited, being the Second and Third Defendants in the Claim**

We write further to this firm's letter and email to Greenpeace dated 20 July 2026 (the "**20 July Correspondence**") and our client's Application to Extend. Unless otherwise indicated, we continue to use the defined terms as set out in the 20 July Correspondence.

- 1.1 We enclose, by way of service on Greenpeace, the Application to Extend as endorsed by the Court.
- 1.2 We have copied Greenpeace into our correspondence with the Court regarding our client's dates of availability for the hearing of the Application to Extend. Please ensure that this firm is copied into any correspondence between Greenpeace and the Court.
- 1.3 We otherwise await your response to the 20 July Correspondence by 4pm on 31 July 2026.

Yours faithfully

A handwritten signature in black ink, appearing to read 'OCL Clarke LLP'.

Osborne Clarke LLP

One London Wall, London, EC2Y 5EB T +44 207 105 7000 F +44 207 105 7005

Osborne Clarke LLP is a limited liability partnership registered in England and Wales with registered number OC397443 whose registered office is at One London Wall, London EC2Y 5EB. It is authorised and regulated in the UK by the Solicitors Regulation Authority (SRA) and is registered as a recognised body with SRA number 619990.

The term 'partner' refers to a member of Osborne Clarke LLP. A list of members of Osborne Clarke LLP and their professional qualifications is available for inspection at the registered office. Any advice given by any individual member, employee, or consultant is the responsibility of Osborne Clarke LLP and not the individual. Osborne Clarke LLP does not accept service by fax.

Osborne Clarke LLP is part of an international legal practice.

osborneclarke.com

Osborne Clarke LLP

E injunctions@osborneclarke.com, donal.kelly@osborneclarke.com and
carl.roche@osborneclarke.com

Encs.

1. Endorsed Application to Extend

From: Jack Robirosa <jack.robirosa@greenpeace.org>
Sent: 30 July 2026 10:02
To: Injunctions; chanceryjudgeslisting@justice.gov.uk
Cc: Donal Kelly; Carl Roche; exuk@greenpeace.org
Subject: RE: RWE Generation UK PLC v Persons Unknown and others - PT-2025-001017 - Claimant's dates to avoid [OC-OC_UK.FID8569336]

Dear Sir/Madam

Claim: PT-2025-001017 – RWE Generation UK PLC v (1) Persons Unknown, (2) Greenpeace UK Limited and (3) Greenpeace Limited

I act for the Second and Third Defendants. The claims against them are currently stayed shall be dismissed on 24 October 2026. The Second and Third Defendants do not intend to attend the hearing and therefore provide no dates to avoid.

Yours faithfully

Jack Robirosa

Legal Counsel
Greenpeace UK
07580 999013

I do not work on Mondays.

Greenpeace Limited
Canonbury Villas
London N1 2PN

Confidentiality Notice: This e-mail and any attachments is from the sender and may be confidential and legally privileged. It is intended solely for the use of named recipients. If you are not an intended recipient, please immediately notify the sender and destroy all copies of this message and attachments.

From: Injunctions
Sent: 10 August 2026 10:25
To: 'Jack Robirosa'; 'exuk@greenpeace.org'
Subject: Claim: PT-2025-001017 - RWE Generation UK Plc v (1) Persons Unknown, (2) Greenpeace UK Limited and (3) Greenpeace Limited [OC-OC_UK.FID8569336]
Attachments: Signed L to Greenpeace - PT-2025-001017 - 10 August 2026(169585638.2).pdf

Dear Greenpeace UK Limited and Greenpeace Limited

Please see the attached correspondence.

Yours faithfully

Osborne Clarke LLP

[osborneclarke.com](https://www.osborneclarke.com)

.....
E injunctions@osborneclarke.com
One London Wall, London EC2Y 5EB
.....



By Email Only

FAO Jack Robirosa

Greenpeace UK Limited and Greenpeace Limited
Greenpeace House
Canonbury Villas
London
N1 2PN

Email: jack.robirosa@greenpeace.org and exuk@greenpeace.org

Our reference HAS/10002880/O169585638.1/HAS

10 August 2026

Dear Greenpeace UK Limited and Greenpeace Limited

Claim: **PT-2025-001017 – RWE Generation UK PLC v (1) Persons Unknown, (2) Greenpeace UK Limited and (3) Greenpeace Limited**

Greenpeace: **Greenpeace UK Limited and Greenpeace Limited, being the Second and Third Defendants in the Claim**

We write further to your letter dated 30 July 2026.

We enclose, by way of service on Greenpeace, the Notice of Hearing.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Donal Kelly'.

Osborne Clarke LLP

E injunctions@osborneclarke.com, donal.kelly@osborneclarke.com and carl.roche@osborneclarke.com

Enc.

1. Notice of Hearing

Osborne Clarke LLP

One London Wall, London, EC2Y 5EB T +44 207 105 7000 F +44 207 105 7005

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osborneclarke.com



HM Courts & Tribunals Service

HM Courts & Tribunal Service
Business and Property Courts of
England and Wales
Rolls Building
7 Rolls Buildings
London
EC4A 1NL
DX 160040 Strand 4
T 020 7947 6690
Email :
chanceryjudgeslisting@justice.gov.uk
www.justice.gov.uk

Copy of notice emailed to the following
injunctions@osborneclarke.com
Donal.Kelly@osborneclarke.com
carl.roche@osborneclarke.com
exuk@greenpeace.org
jack.robirosa@greenpeace.org
sophie.abbott@osborneclarke.com

Date 31 July 2026

Case reference: PT-2025-001017
Case Title: RWE Generation UK PLC v Persons Unknown and others

Notice of Application Hearing Date

The Claimants application notice dated 17 July 2026 has been listed is in a 3 day window from the 19 October 2026 with a time estimate of half a day.

Information regarding the listing of this case can be found on the Justice website
<https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111> at approximately 2pm on the previous working day.

Yours Faithfully
Mark Quigley,
Chancery Listing Office



INVESTOR IN PEOPLE



**By Special Delivery, First Class Post and
Email: Joanna.Lobo@nationalgrid.com**

Legal Department

National Grid Electricity Transmission PLC
1-3 Strand
London
WC2N 5EH

Our ref.
Contact Rachel Smith
Phone 07989 493817
Email Rachel.smith@rwe.com

11 August 2026

**URGENT
THIS LETTER CONCERNS AN INJUNCTION. YOU SHOULD READ IT
CAREFULLY.**

Staythorpe Power Station:	Staythorpe Power Station, Staythorpe, Newark NG23 5RQ
Staythorpe Lease:	Leasehold interest registered with HM Land Registry under title reference NT409895, being a lease dated 11 August 2003 and made between (1) Innogy PLC and (2) Transco PLC
Didcot Power Station:	Didcot Power Station, Didcot, Oxfordshire OX11 7YU
Didcot Lease:	Leasehold interest registered with HM Land Registry under title reference ON191378, being a lease dated 31 March 1990 and made between (1) National Power PLC and (2) The National Grid Company PLC
Second Didcot Lease:	Leasehold interest registered with HM Land Registry under title reference ON297164, being a lease dated 14 April 2011 and made between (1) RWE Npower PLC and (2) National Grid Electricity Transmission PLC
	(the Didcot Lease together with the Second Didcot Lease, the "Didcot Leases")

Dear Directors

I write further to the letter of Will Jeffery dated 7 October 2025 and my letter dated 29 October 2025 (copies enclosed). Unless otherwise stated, I continue to use the defined terms as set out in previous correspondence.

RWE Generation UK plc
Trigonos
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

T +44(0)1793 87 77 77
F +44(0)1793 49 15 86
I www.rwe.com

Registered Office:
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

Registered in England
and Wales no. 03892782



Page 2

As notified to you in previous correspondence, an injunction is currently in place against Persons Unknown in relation to six RWE power stations. Further detail as to the land affected by the injunction can be found in the Order and Further Order.

Paragraph 3 of the Further Order provides that RWE may apply to the court to extend the injunction for a period of 12 months from 24 October 2026.

Please treat this letter as formal notification to you of RWE's application to extend the injunction under paragraph 3 of the Further Order. Copies of the application, the application as endorsed by the court and the notice of hearing are enclosed in this letter. The court has listed the hearing of the application in a three day window from 19 October 2026 with a time estimate of half a day.

Copies of all existing relevant documents can be downloaded from the following website: <https://uk.rwe.com/injunction/>. Any further documents relating to the injunction, including confirmation as to the date for the hearing, will be uploaded to this website as and when they are produced.

If you require any further information in respect of the injunction or the application, please contact me at Rachel.Smith@rwe.com.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Rachel Smith', is written over a horizontal line.

Rachel Smith (Senior Solicitor)
For and on behalf of RWE Generation UK PLC

Encs



By Special Delivery and First Class Post

Eastern Power Networks PLC
Newington House
237 Southwark Bridge Road
London
SE1 6NP

Legal Department

Our ref.
Contact Rachel Smith
Phone 07989 493817
Email Rachel.smith@rwe.com

11 August 2026

URGENT
THIS LETTER CONCERNS AN INJUNCTION. YOU SHOULD READ IT CAREFULLY.

Little Barford Power Station: Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT

Little Barford Lease: Leasehold interest registered with HM Land Registry under title reference BD168495, being a lease dated 30 March 1990 and made between (1) Central Electricity Generating Board and (2) Eastern Electricity Board

Great Yarmouth Power Station: Great Yarmouth Power Station, South Denes Road, Great Yarmouth, NR30 3PY

Great Yarmouth Lease: Leasehold interest registered with HM Land Registry under title reference NK363229, being a lease dated 26 July 2007 and made between (1) Great Yarmouth Power Limited and (2) EDF Energy Networks (EPN) PLC

Second Great Yarmouth Lease: Leasehold interest registered with HM Land Registry under title reference NK363233, being a lease dated 26 July 2007 and made between (1) Great Yarmouth Power Limited and (2) EDF Energy Networks (EPN) PLC

Kings Lynn Power Station: (the Great Yarmouth Lease together with the Second Great Yarmouth Lease, the "Great Yarmouth Leases")

RWE Generation UK plc

Trigonos
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

T +44(0)1793 87 77 77
F +44(0)1793 49 15 86
I www.rwe.com

Registered Office:
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

Registered in England
and Wales no. 03892782

...



Page 2

**Kings Lynn
Freehold
Interest:**

Kings Lynn Power Station, King's Lynn PE34 3RD

**Freehold interest registered with HM Land Registry
under title reference NK218673, being
land to the North of North Sea Bank, Willows
Business Park, Kings Lynn**

Dear Directors

I write further to the letter of Will Jeffery dated 7 October 2025 and my letter dated 29 October 2025 (copies enclosed). Unless otherwise stated, I continue to use the defined terms as set out in previous correspondence.

As notified to you in previous correspondence, an injunction is currently in place against Persons Unknown in relation to six RWE power stations. Further detail as to the land affected by the injunction can be found in the Order and Further Order.

Paragraph 3 of the Further Order provides that RWE may apply to the court to extend the injunction for a period of 12 months from 24 October 2026.

Please treat this letter as formal notification to you of RWE's application to extend the injunction under paragraph 3 of the Further Order. Copies of the application, the application as endorsed by the court and the notice of hearing are enclosed in this letter. The court has listed the hearing of the application in a three day window from 19 October 2026 with a time estimate of half a day.

Copies of all existing relevant documents can be downloaded from the following website: <https://uk.rwe.com/injunction/>. Any further documents relating to the injunction, including confirmation as to the date for the hearing, will be uploaded to this website as and when they are produced.

If you require any further information in respect of the injunction or the application, please contact me at Rachel.Smith@rwe.com.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Rachel Smith', is written over the 'Yours faithfully' text.

**Rachel Smith (Senior Solicitor)
For and on behalf of RWE Generation UK PLC**

Encs



By Special Delivery and First Class Post

National Gas Transmission PLC
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Legal Department

Our ref.
Contact Rachel Smith
Phone 07989 493817
Email Rachel.smith@rwe.com

11 August 2026

URGENT
THIS LETTER CONCERNS AN INJUNCTION. YOU SHOULD READ IT CAREFULLY.

Staythorpe Power Station:	Staythorpe Power Station, Staythorpe, Newark NG23 5RQ
Staythorpe Lease:	Leasehold interest registered with HM Land Registry under title reference NT372031, being a lease dated 1 July 2001 and made between (1) Innogy PLC and (2) Transco PLC
Didcot Power Station:	Didcot Power Station, Didcot, Oxfordshire OX11 7YU
Didcot Lease:	Leasehold interest registered with HM Land Registry under title reference ON194931, being a lease dated 13 January 1997 and made between (1) National Power PLC and (2) British Gas PLC
Kings Lynn Power Station:	Kings Lynn Power Station, Kings Lynn, PE34 3RD
Kings Lynn Lease:	Leasehold interest registered with HM Land Registry under title reference NK179596, being a lease dated 8 April 1995 and made between (1) Anglian Power Generators Limited and (2) British Gas PLC

Dear Directors

I write further to the letter of Will Jeffery dated 7 October 2025 and my letter dated 29 October 2025 (copies enclosed). Unless otherwise stated, I continue to use the defined terms as set out in previous correspondence.

...

RWE Generation UK plc

Trigonos
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

T +44(0)1793 87 77 77
F +44(0)1793 49 15 86
I www.rwe.com

Registered Office:
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

Registered in England
and Wales no. 03892782



Page 2

As notified to you in previous correspondence, an injunction is currently in place against Persons Unknown in relation to six RWE power stations. Further detail as to the land affected by the injunction can be found in the Order and Further Order.

Paragraph 3 of the Further Order provides that RWE may apply to the court to extend the injunction for a period of 12 months from 24 October 2026.

Please treat this letter as formal notification to you of RWE's application to extend the injunction under paragraph 3 of the Further Order. Copies of the application, the application as endorsed by the court and the notice of hearing are enclosed in this letter. The court has listed the hearing of the application in a three day window from 19 October 2026 with a time estimate of half a day.

Copies of all existing relevant documents can be downloaded from the following website: <https://uk.rwe.com/injunction/>. Any further documents relating to the injunction, including confirmation as to the date for the hearing, will be uploaded to this website as and when they are produced.

If you require any further information in respect of the injunction or the application, please contact me at Rachel.Smith@rwe.com.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Rachel Smith', is written over a horizontal line.

Rachel Smith (Senior Solicitor)
For and on behalf of RWE Generation UK PLC

Encs

From: Joanna Lobo <Joanna.Lobo@nationalgrid.com>
Sent: 17 August 2026 12:34
To: Smith, Rachel
Subject: [EXT] RE: [EXTERNAL] RWE Injunction regarding protesters at its power station sites.

[EXTERNAL SENDER **]:**
Do not click links, open attachments or enter your ID/Password unless you recognize the sender and certain the content is safe. **If anything appears suspicious, report it.** Consider the following before taking action: Were you expecting this email? Can you verify the sender? Are the grammar and spelling correct? Does the content or request make sense?
[EXTERNER ABSENDER **]:**
Klicken Sie nicht auf Links, öffnen Sie keine Anhänge und geben Sie Ihre ID/Ihr Kennwort nur dann ein, wenn Sie den Absender erkennen und sicher sind, dass der Inhalt sicher ist. **Wenn Ihnen etwas verdächtig vorkommt, melden Sie es.** Beachten Sie Folgendes, bevor Sie Maßnahmen ergreifen: Hatten Sie diese E-Mail erwartet? Können Sie den Absender verifizieren? Sind Grammatik und Rechtschreibung korrekt? Ergibt der Inhalt oder die Aufforderung einen Sinn?

Hi Rachel

I acknowledge receipt of these and am obtaining instructions.

Thanks

Jo

Joanna Lobo

Senior Lawyer- Disputes, Health, Safety & Environment
nationalgrid

+44 (0)7769 163624

joanna.lobo@nationalgrid.com

Pronouns: she/her/hers

National Grid House, Floor B2, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA

[nationalgrid.com](https://www.nationalgrid.com)

Strictly Confidential

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 NT349128

Edition date 02.09.2009

- This official copy shows the entries on the register of title on 30 SEP 2026 at 12:44:54.
- 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 30 Sep 2026.
- 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 : NEWARK AND SHERWOOD

- 1 (02.05.2000) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Staythorpe Power Station, Averham (NG23 5RQ).
- 2 (02.05.2000) The mines and minerals together with ancillary powers of working are excepted.
- 3 (02.05.2000) There are excluded from this registration the substation sites and assets listed in schedules 1 and 2 of a Deed dated 30 March 1990 made between (1) Central Electricity Generating Board and (2) East Midlands Electricity Board.
NOTE: Original filed.
- 4 (02.05.2000) The land has the benefit of the rights granted by but is subject to the rights reserved by the Deed dated 31 March 1990 referred to in the Charges Register.
- 5 (04.04.2002) The land has the benefit for a term of 99 years from 20 February 2002 of the rights granted by a Deed dated 20 February 2002 made between (1) Railtrack Plc and (2) Innogy Plc.
NOTE: Original filed.

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 (02.05.2000) PROPRIETOR: RWE NPOWER PLC (Co. Regn. No. 3892782) of Windmill Hill Business Park, Whitehill Way, Swindon, Wilts SN5 6PB.
- 2 (02.05.2000) A Deed dated 16 March 2000 supplemental to the Transfer to the proprietor contains a covenant to observe and perform the covenants referred to in the Charges Register and of indemnity in respect

Title number NT349128

B: Proprietorship Register continued

thereof.

C: Charges Register

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

- 1 (02.05.2000) A Deed dated 31 March 1990 made between (1) National Power Plc and (2) The National Grid Company Plc contains restrictive covenants.

NOTE: Original filed.

- 2 (02.05.2000) The land is subject to the rights granted by a Deed of Grant dated 31 March 1990 made between (1) National Power Plc and (2) The National Grid Company Plc.

The said Deed also contains restrictive covenants by the grantor.

NOTE: Original filed.

- 3 (18.06.2002) The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.
The leases grant and reserve easements as therein mentioned.

- 4 (18.06.2002) The land is subject to the rights granted by a Deed dated 29 January 2002 made between (1) Innogy PLC and (2) Transco PLC.

The said Deed also contains restrictive covenants by the grantor.

NOTE: Copy filed.

Schedule of notices of leases

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	18.06.2002 edged and numbered 1 in blue	Land at Staythorpe Power Station	29.01.2002 99 years from 1 July 2001	NT372031
2	22.07.2005 edged and numbered 2 in blue	heavy lifting platform	11.08.2003 50 years from 11.8.2003	NT409895

End of register

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Accept analytics cookies

Set cookie preferences

HM Land Registry



Request Official Copies

Property details

Required fields are marked by *

Title number: NT421944
Address: Part Of Staythorpe Power Station, Staythorpe
Tenure: Leasehold
This Title is administered by: HM Land Registry, Nottingham Office

Title documents unavailable

According to our records this title number has been cancelled (or closed)

[New search](#)

[Amend search](#)

☐ * I wish to proceed to order official copy documents

From: Millie Gillett T/DS3213 <Millie.Gillett1@notts.police.uk>
Sent: 05 September 2026 20:08
To: Reshma Adkin <reshma.adkin@osborneclarke.com>

Cc: Amy Lewis <amy.lewis@osborneclarke.com>

Subject: Op Pretender - Staythorpe Protest

**** EXTERNAL EMAIL ****

Good Afternoon both,

I just wanted to update you that I have finally heard back from CPS and unfortunately they have decided not to pursue a charge in relation to this investigation.

I appreciate that this is not the outcome you hoped for; if you disagree with this outcome and wish to appeal, this would be directly through the CPS as they have made the decision.

If you do wish to appeal, I can find out who would be your best contact.

I apologise again that this is not the outcome that we both hoped for, thank you for all your time and efforts in facilitating all the statements.

Best wishes,
Millie



T/DS 3213 Millie Gillett
Mansfield CID - Team 1
Mansfield Police Station
Great Central Road
Mansfield
NG18 2HQ

Tel: 0115 844 5999 / 101 ext. 3103213 / 07971781430

www.nottinghamshire.police.uk



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[communications-and-osborne-clarke](#)

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We've updated our [Privacy & Confidentiality Policy](#) to reflect our continuing use of cloud based technology solutions.

Osborne Clarke DCL UK

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If you have received this e-mail in error, please notify the sender and delete it immediately and permanently remove it from your system.

RWE Generation UK plc does not accept any responsibility for losses or damage as a result of any viruses and it is your responsibility to check attachments (if any) for viruses.

RWE Generation UK plc, company number 3892782.
Registered Office: Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire SN5 6PB,
Registered in England and Wales.



By Special Delivery and First Class Post

Vincent McGoldrick
38 Peacocks Close
Sudbury
Suffolk
CO10 8DA

Our reference DKA/10002880/O170574179.1/TCU

28 September 2026

Dear Mr McGoldrick,

Claim No: PT-2025-001017

RWE Generation UK Plc v (1) Persons Unknown who without the claimants permission enter or remain upon the premises described in the claim form, or who damage or deface any of those premises or any part of them, for the purposes of protest whether in support of any Greenpeace campaign or otherwise, (2) Greenpeace UK Limited and (3) Greenpeace Limited

As you are aware, we act for RWE Generation UK plc, the "**Claimant**" in the above proceedings. We write to further to our letter dated 26 September 2026. We confirmed in that letter that copies of all documents relating to the Review Hearing can be found here: <https://uk.rwe.com/injunction>.

However, the letter referred to an enclosed Order dated 24 October 2025, but we understand this was not enclosed with the letter served. We therefore enclose a copy for completeness.

We await hearing from you in early course.

Yours faithfully

Osborne Clarke LLP

Osborne Clarke LLP

T +44 207 105 7000

E injunctions@osborneclarke.com

Enc. – Order dated 24 October 2025

Osborne Clarke LLP

One London Wall, London, EC2Y 5EB T +44 207 105 7000 F +44 207 105 7005

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osborneclarke.com

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)



Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR 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.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it 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.

BEFORE the Honourable Mr Justice Trower on 24 October 2025

UPON the Claimants having issued this Claim by a Claim Form dated 1 October 2025

AND UPON the Claimant's application for an ex parte interim injunction by Application Notice dated 1 October 2025

AND UPON interim injunctive relief having been granted at an ex parte hearing by the Honourable Mr Justice Rajah on 3 October 2025

AND UPON the Claimants seeking continuation of the interim injunctive relief granted on 3 October 2025

AND UPON the Second Defendant and Greenpeace Limited (which is joined to these proceedings as Third Defendant for the purpose of giving the undertaking hereinafter referred to) having agreed terms including undertakings provided by those Defendants to the Court on 24 October 2025 annexed to this Order at Schedule 4 ("the Undertakings")

AND UPON the Court having accepted the Undertakings

AND UPON READING the Witness Statements of Rachel Jane Smith dated 1 October 2025, William Henry Jeffery dated 1 October 2025, and Donal Patrick Kelly dated 20 October 2025

AND UPON HEARING Timothy Morshead KC and Jacqueline Lean for the Claimant

AND UPON the Claimant giving and the Court accepting the undertakings set out in Schedule 1 to this Order

IT IS ORDERED THAT:

INJUNCTION

1. The First Defendants must not enter, occupy or remain on, or damage or deface any part (including the perimeter fence), of the land and premises shown edged red on Plans 1 to 6 to this Order, being:
 - (i) Staythorpe Power Station, Staythorpe, Newark, NG23 5RQ, as shown edged red on Plan 1;
 - (ii) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - (iii) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - (iv) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - (v) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5.
 - (vi) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6.
2. In respect of anything prohibited by paragraph 1 above, the First Defendants must not (a) do it himself/herself/themselves in any other way or (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

REVIEW

3. The injunction set out at paragraphs 1 and 2 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant shall file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days

before the hearing. The injunction set out at paragraphs 1 and 2 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place, such application to be made not less than 3 months before the date on which the injunction would otherwise lapse. Provided such application is made not less than 3 months before the anniversary of the order (or as the case may be the latest annual review) the Court shall list the review hearing on or before the date on which the injunction set out at paragraphs 1 and 2 of this Order would otherwise lapse.

SERVICE AND NOTIFICATION

4. Service of this Order on the First Defendant is dispensed with, pursuant to CPR 6.28 and 81.4(2)(c).
5. This Order be notified to the First Defendants by the Claimant carrying out each of the following steps:
 - (i) Uploading a copy on to the following website: <https://uk.rwe.com/injunction>
 - (ii) Affixing a copy of the Order in A4 size in a clear plastic envelope at prominent locations at each of the Sites shown edged red on Plans 1 to 6.
 - (iii) Affixing warning notices of A2 size at those locations at each of the sites shown edged red on Plans 1 to 6, substantially in the form of the notice at Schedule 3.
6. Notification to the First Defendants of any further applications or documents shall be effected by the Claimants carrying out each of the following steps:
 - (i) Uploading a copy of the application on to the following website: <https://uk.rwe.com/injunction>

- (ii) Affixing notices at or near the aforesaid prominent locations at the relevant Site/s shown edged red on Plans 1-6, stating that the application has been made or document/s provided and where the application or document/s can be accessed in hard copy and online.
- 7. In respect of paragraphs 5 and 6 above, effective notification will be deemed to have taken place in relation to each Site on the date on which all the relevant steps have been carried out.
- 8. For the avoidance of doubt, in respect of the steps referred to at paragraphs 5(ii), 5(iii), and 6(ii), effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed or defaced without the Claimant's consent.
- 9. The Claimant shall use reasonable endeavours to maintain and as the case may be replace the documents in their fixed positions and in legible form.
- 10. In relation to the Second Defendant: pursuant to CPR rule 6.27, the Claimant has permission to serve the Second Defendant with this Order and any further applications or documents in the Claim by email to:
 - (i) exuk@greenpeace.org; and
 - (ii) jack.robirosa@greenpeace.org
- 11. In relation to the Third Defendant: pursuant to CPR rule 6.27, the Claimant has permission to serve the Third Defendant with this Order and any further applications or documents in the Claim by email to:
 - (i) exuk@greenpeace.org; and
 - (ii) jack.robirosa@greenpeace.org
- 12. The deemed date of service of any documents referred to in paragraphs 10 and 11 above shall be the day on which service is completed in accordance with paragraph 10 or 11 above.

13. The Claimant shall use reasonable endeavours to notify the owners (where known) of the areas of land shown hatched blue on Plans 1A, 2A, 4A, 5A and 6A at Annexure 2 to the Particulars of Claim of this Order by not later than 5pm on 31 October 2025.

VARIATION

14. Anyone interested may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant 48 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant at least 24 hours in advance of any hearing.
15. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
16. The Claimant has liberty to apply to vary this Order.

OTHER ORDERS

17. The Third Defendant is joined as a party to this claim pursuant to the Claimant's application dated 23 October 2025.
18. It shall be sufficient for the Claimant to notify the First Defendant of the application dated 23 October 2025 by undertaking the step specified in paragraph 6(i) of this Order, namely by uploading a copy of the application on to the following website: <https://uk.rwe.com/injunction>.

COSTS

19. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

20. The Claimant's solicitors and their contact details are:

- (i) Carl Roche of Osborne Clarke LLP, email: carl.roche@osborneclarke.com
- (ii) Donal Kelly of Osborne Clarke LLP, email: donal.kelly@osborneclarke.com

Osborne Clarke LLP, One London Wall, London, EC2Y 5EB

COMMUNICATIONS WITH THE COURT

Chancery Division, The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL by
the Court's e-filing service at <https://efile.cefile-app.com>

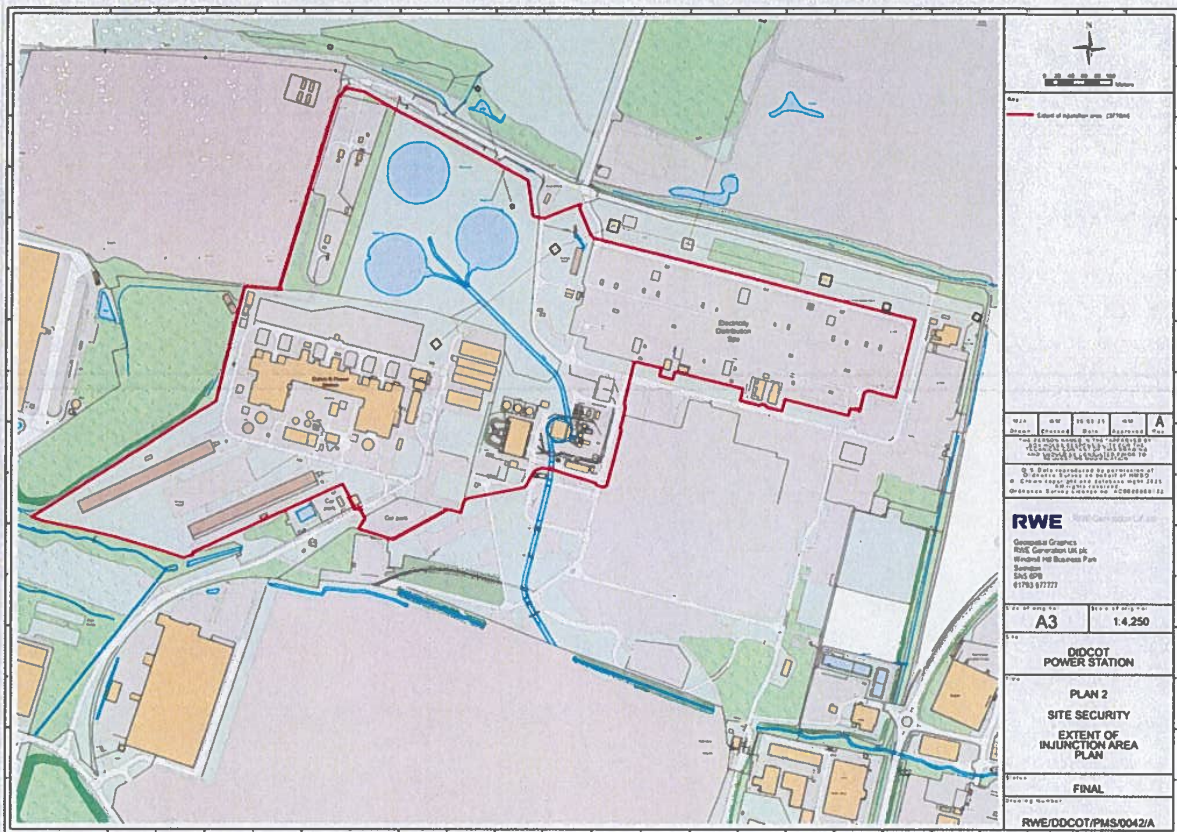
Dated: 24 October 2025

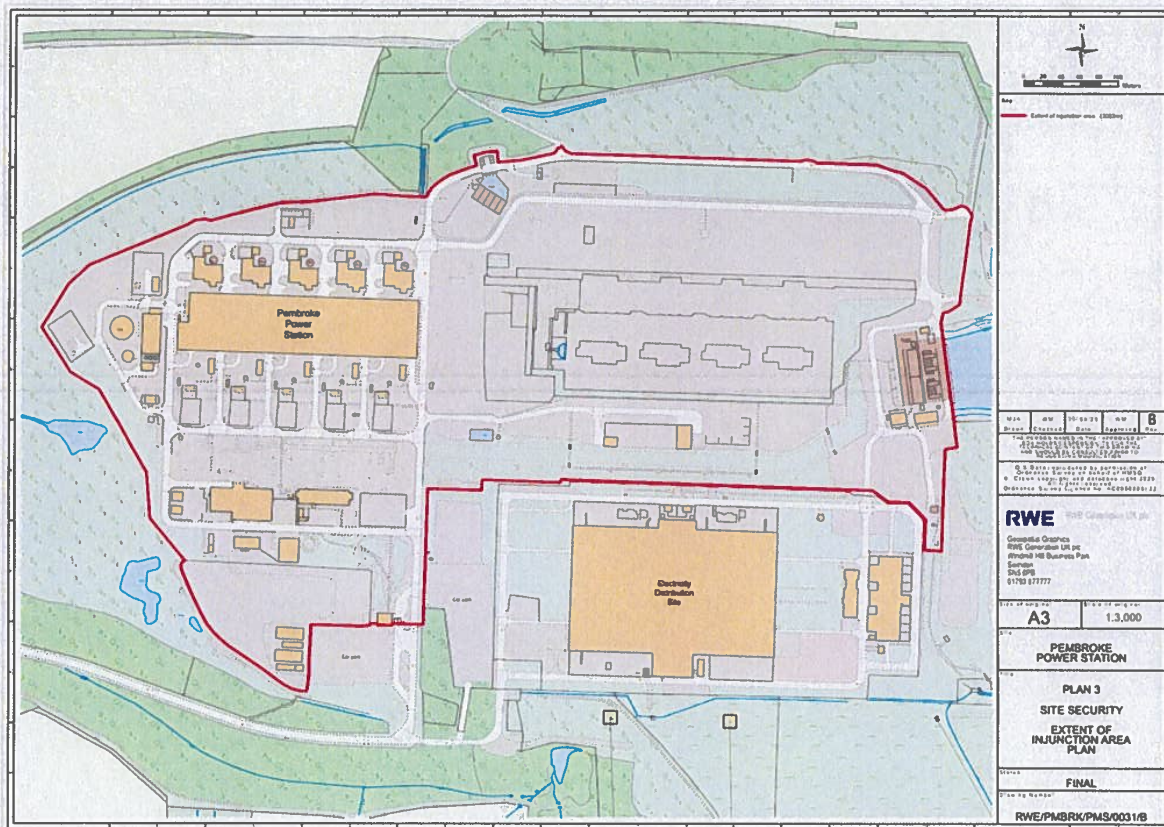
SCHEDULE 1 – CLAIMANT’S UNDERTAKINGS

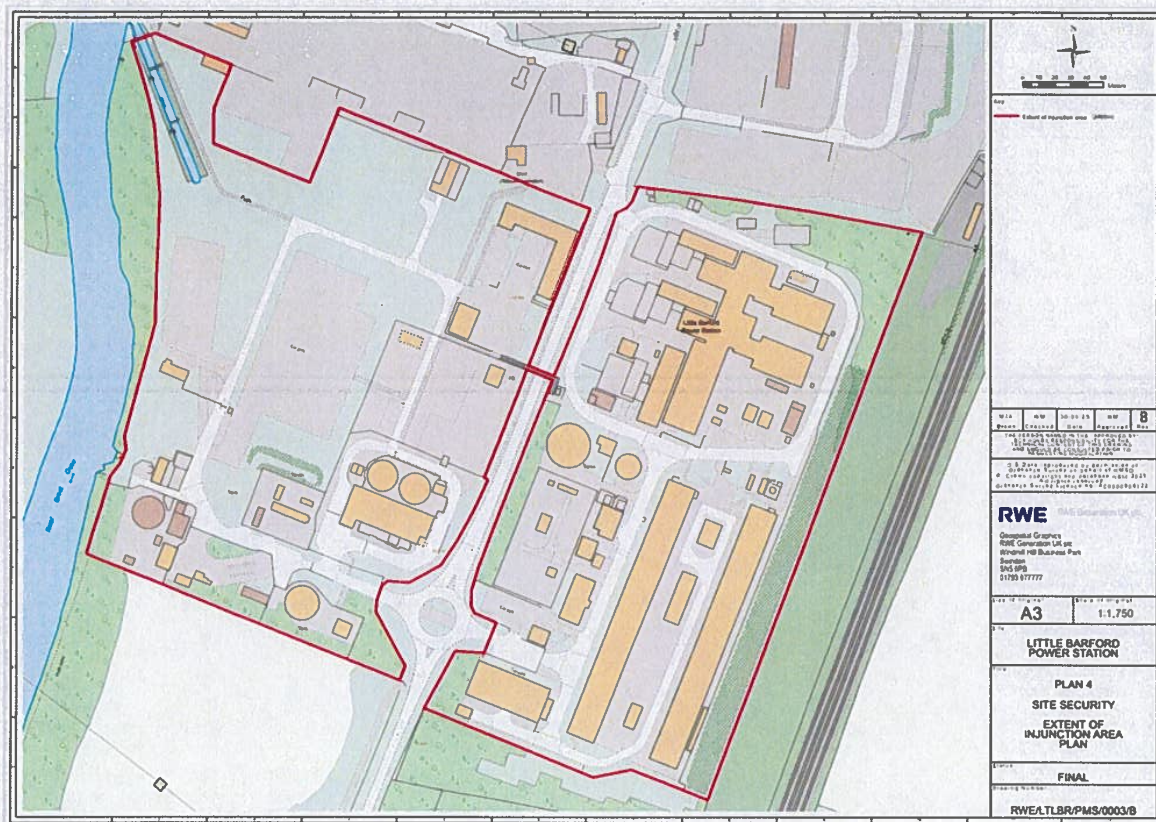
1. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraphs 1 or 2 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

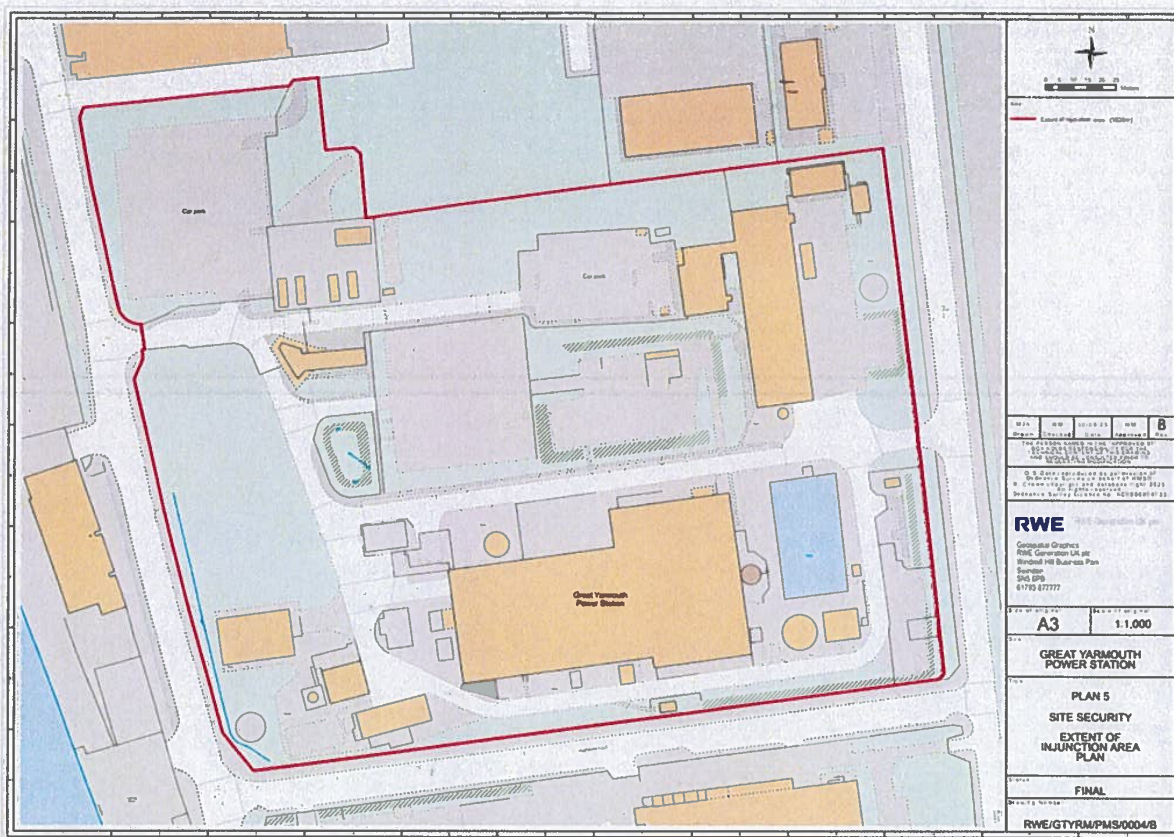
SCHEDULE 2 – PLANS

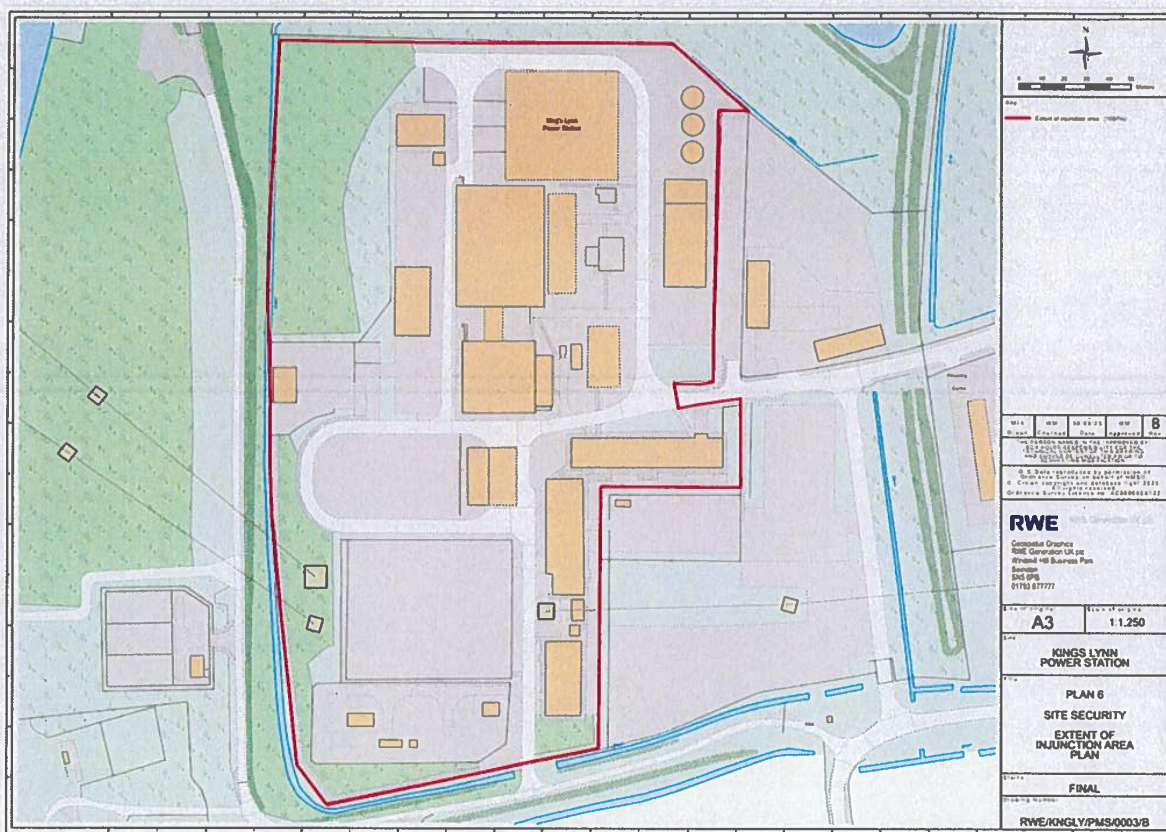












SCHEDULE 3– WARNING NOTICE

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-001017 on 2025 exists relating to the land and premises known as

The injunction means you may not:

**FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON OR
DAMAGE OR DEFACE ANY PART (INCLUDING THE PERIMETER FENCE)
OF THE LAND AND PREMISES SHOWN EDGED RED ON PLAN
BEING**

[Plan]

**ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING
ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE
HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED
OR HAVE THEIR ASSETS SEIZED**

A copy of the Order and the legal proceedings to which it relates can be viewed at
<https://uk.rwe.com/injunction> or obtained by e-mailing injunctions@osborneclarke.com

**SCHEDULE 4 – UNDERTAKINGS GIVEN BY THE SECOND AND THIRD
DEFENDANTS**

Claim No: PT-2025-001017

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PROPERTY, TRUST AND PROBATE LIST



BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)

Claimant

and

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR
REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE
OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES
OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR
OTHERWISE.**

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

**IF YOU THE WITHIN THIRD DEFENDANT BREACH THE UNDERTAKING OFFERED BY YOU
HEREIN OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THAT UNDERTAKING, YOU
MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE
YOUR ASSETS SEIZED.**

RECITALS

- A. On 3 October 2025, the court made an order on an ex parte basis restraining the Second Defendant from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises as set out in paragraph 1 of that order (the "Interim Order").
- B. The Interim Order was sealed by the court on 6 October 2025.

- C. The return date hearing is listed for 24 October 2025.
- D. The Third Defendant, without admission of liability, is willing to give an undertaking to the court on substantially the same terms as the Interim Order.
- E. The Claimant is willing to settle the Claim against the Third Defendant on the basis of the undertaking and the terms set out below.

Undertaking to the Court

1. Until the date 12 months from the date of this order or until further order of the court, whichever is earlier, the Third Defendant undertakes to the court that the Third Defendant will not:
 - i. enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the land and premises shown edged red on Plans 1 to 6 to this order, being:
 - a) Staythorpe Power Station, Staythorpe, Newark, NG23 5PS, as shown edged red on Plan 1;
 - b) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - c) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - d) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - e) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5; and
 - f) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6; and
 - ii. in respect of anything prohibited by paragraph i above, (a) do it himself / herself / themselves in any other way or (b) do it by means of another person acting on his / her / their behalf, or acting on his / her / their instructions.

Duration, Liberty to Apply and Variations

2. The undertaking shall take effect immediately and shall continue until the date 12 months from the date of this order or until further order of the court, whichever is earlier.
3. Upon the making of this Order, the Claim against the Third Defendant shall be stayed except for the purpose of giving effect to its terms and to the Third Defendant's undertaking.
4. Subject to the Third Defendant having complied with its undertaking and the terms of this Order, the claim against the Third Defendant shall be dismissed with no order as to costs on the date 12 months from the date of this Order.

Service

5. Service of this order may be effected by email to jack.robirosa@greenpeace.org and exuk@greenpeace.org.

Costs

5. There be no order as to the costs of and occasioned by this order and the undertaking recorded herein.

Statement of Acknowledgment by the Third Defendant

The Third Defendant understands that the undertaking above has the same force and effect as an order of the court. The Third Defendant understands that if it breaches this undertaking it may be held in contempt of court and may be imprisoned, fined and / or have its assets seized. The Third Defendant confirms that it has been advised that it should seek legal advice. The Third Defendant confirms that it understands the meaning and effect of the undertaking.

Signed: Jack Robirosa

Name: Jack Robirosa

For and on behalf of the Third Defendant

Date: 24 October 2025

OR

Signed: _____

[Solicitors' name], Solicitors for the Third Defendant

[Address, reference, email, telephone]

Date:

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

Before: The Honourable Mr Justice Trower

Dated: 24 October 2025

BETWEEN:

RWE GENERATION UK PLC

(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

(2) GREENPEACE UK LIMITED

(Company registration number 02463348)

(3) GREENPEACE LIMITED

(Company registration number 01314381)

Defendants

ORDER

The Court accepts the undertakings given by the Third Defendant in the Order hereby approved and attached, but any director of the Third Defendant desiring to contend that the person signing the undertaking on its behalf was not authorised to do so may apply for that purpose by not later than 4pm on 29 October 2025.

Judge's Endorsement

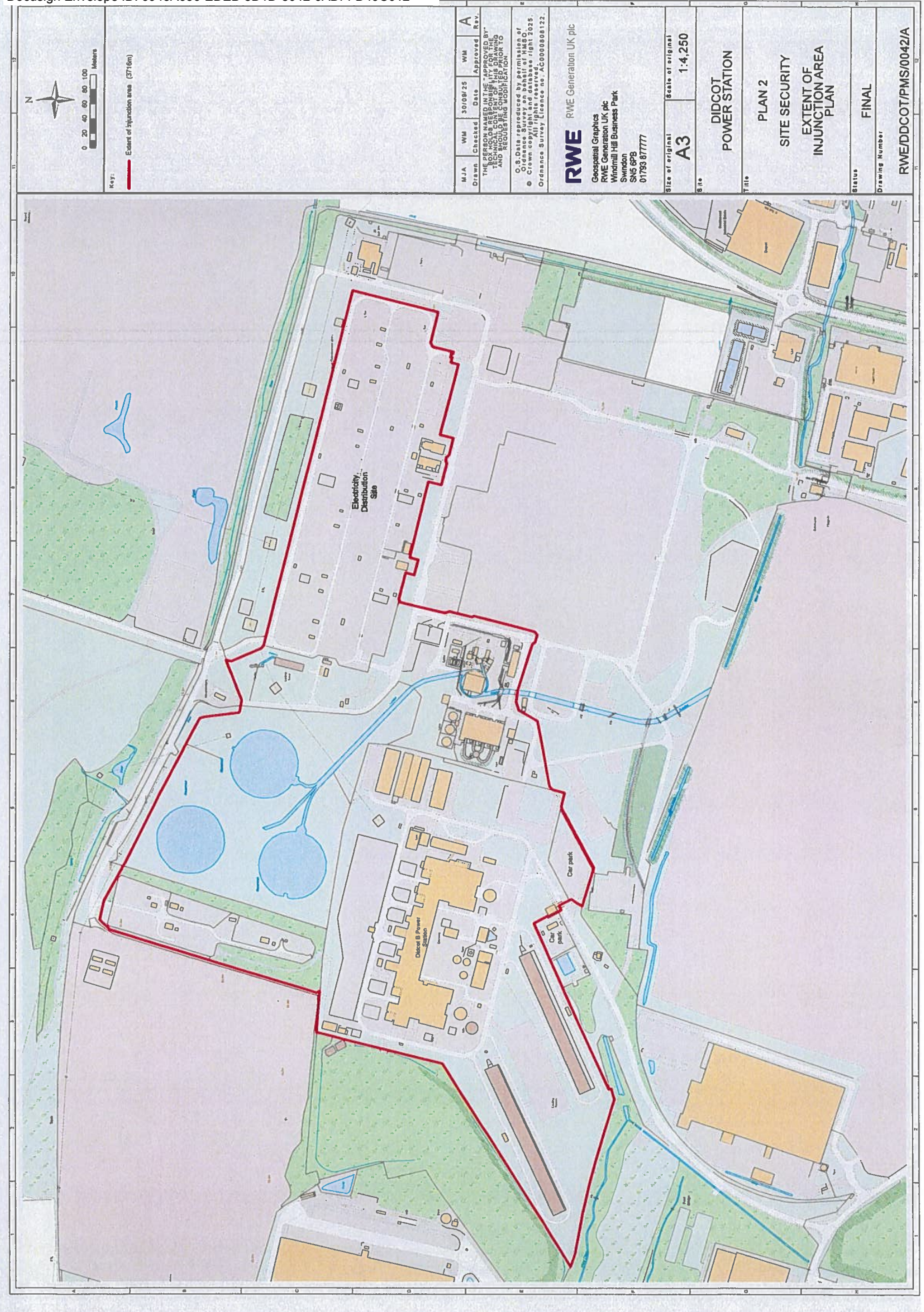
The Court notes and accepts the undertakings given by the Third Defendant recorded above.

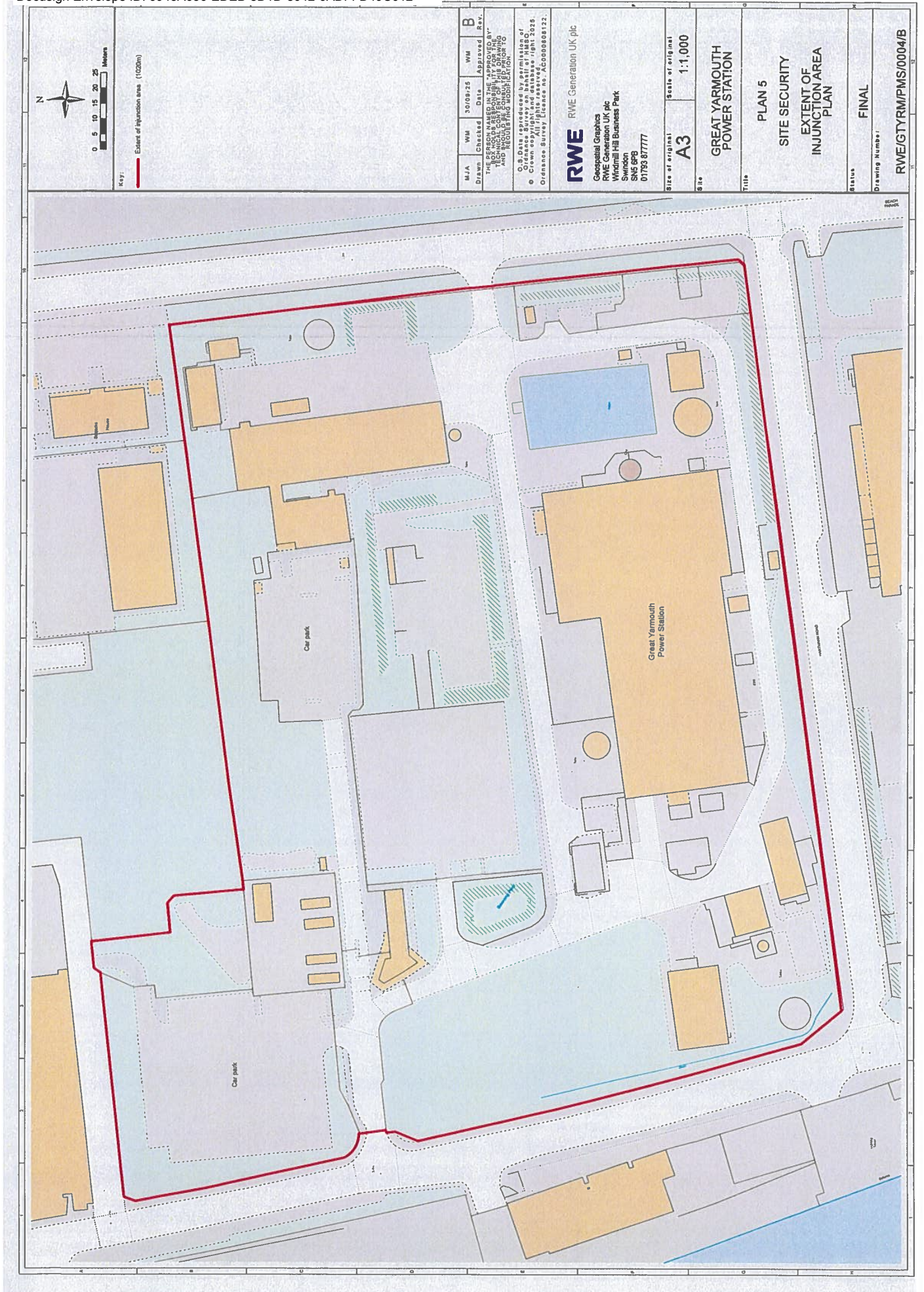
Dated: 24 October 2025

Judge: *Alvin Thomas*

SCHEDULE 1: PLANS 1-6









Claim No: PT-2025-001017

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PROPERTY, TRUST AND PROBATE LIST



BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)

Claimant

and

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR
REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE
OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES
OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR
OTHERWISE.**

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

ORDER

PENAL NOTICE

**IF YOU THE WITHIN SECOND DEFENDANT BREACH THE UNDERTAKING OFFERED BY YOU
HEREIN OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THAT UNDERTAKING, YOU
MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE
YOUR ASSETS SEIZED.**

RECITALS

- A. On 3 October 2025, the court made an order on an ex parte basis restraining the Second Defendant from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises as set out in paragraph 1 of that order (the "Interim Order").

- B. The Interim Order was sealed by the court on 6 October 2025.
- C. The return date hearing is listed for 24 October 2025.
- D. The Second Defendant, without admission of liability, is willing to give an undertaking to the court on substantially the same terms as the Interim Order.
- E. The Claimant is willing to settle the Claim against the Second Defendant on the basis of the undertaking and the terms set out below.

Undertaking to the Court

1. Until the date 12 months from the date of this order or until further order of the court, whichever is earlier, the Second Defendant undertakes to the court that the Second Defendant will not:
 - i. enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the land and premises shown edged red on Plans 1 to 6 to this order, being:
 - a) Staythorpe Power Station, Staythorpe, Newark, NG23 5PS, as shown edged red on Plan 1;
 - b) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - c) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - d) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - e) Great Yarmouth Power Station, , South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5; and
 - f) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6; and
 - ii. in respect of anything prohibited by paragraph i above, (a) do it himself / herself / themselves in any other way or (b) do it by means of another person acting on his / her / their behalf, or acting on his / her / their instructions.

Duration, Liberty to Apply and Variations

2. The undertaking shall take effect immediately and shall continue until the date 12 months from the date of this order or until further order of the court, whichever is earlier.
3. Upon the making of this Order, the Claim against the Second Defendant shall be stayed except for the purpose of giving effect to its terms and to the Second Defendant's undertaking.
4. Subject to the Second Defendant having complied with its undertaking and the terms of this Order, the claim against the Second Defendant shall be dismissed with no order as to costs on the date 12 months from the date of this Order.

Service

5. Service of this Order on the Second Defendant may be effected by email to jack.robiosa@greenpeace.org and exuk@greenpeace.org.

Costs

6. There be no order as to the costs of and occasioned by this order and the undertaking recorded herein.

Statement of Acknowledgment by the Second Defendant's representative

The Second Defendant understands that the undertaking above has the same force and effect as an order of the court. The Second Defendant understands that if it breaches this undertaking it may be held in contempt of court and may be imprisoned, fined and / or have its assets seized. The Second Defendant confirms that it has been advised that it should seek legal advice. The Second Defendant confirms that it understands the meaning and effect of the undertaking.

Signed: Jack Robirosa

Name: Jack Robirosa

For and on behalf of the Second Defendant

Date: 24 October 2025

OR

Signed: _____

[Solicitors' name], Solicitors for the Second Defendant

[Address, reference, email, telephone]

Date:

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2025-001017

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

Before: The Honourable Mr Justice Trower

Dated: 24 October 2025

BETWEEN:

RWE GENERATION UK PLC

(Company registration number 3892782)

Claimant

and

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION
ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM
FORM, OR WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR
ANY PART OF THEM, FOR THE PURPOSES OF PROTEST WHETHER IN
SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.**

(2) GREENPEACE UK LIMITED

(Company registration number 02463348)

(3) GREENPEACE LIMITED

(Company registration number 01314381)

Defendants

ORDER

The Court accepts the undertakings given by the Second Defendant in the Order hereby approved and attached, but any director of the Second Defendant desiring to contend that the person signing the undertaking on its behalf was not authorised to do so may apply for that purpose by not later than 4pm on 29 October 2025.

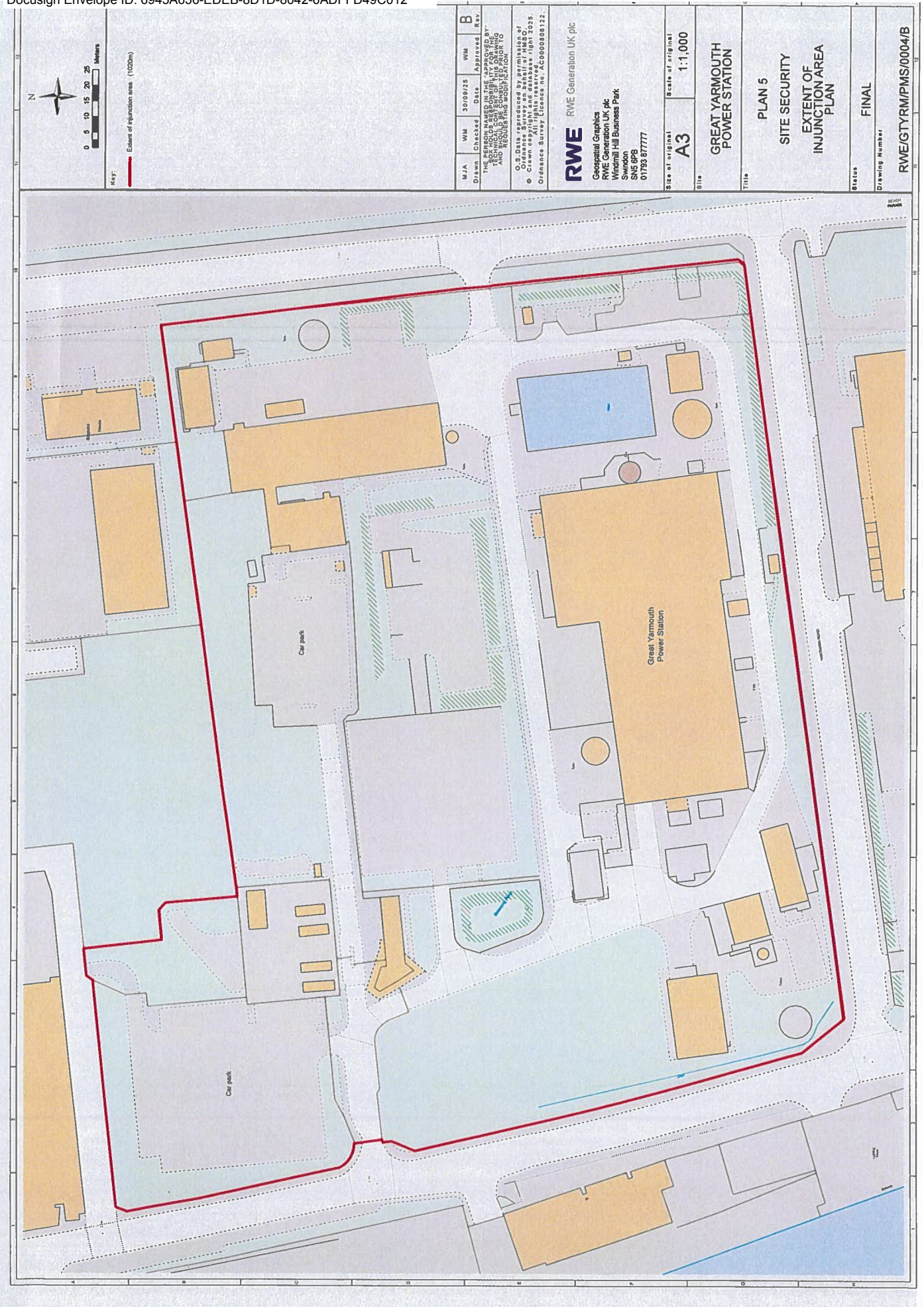
Judge's Endorsement

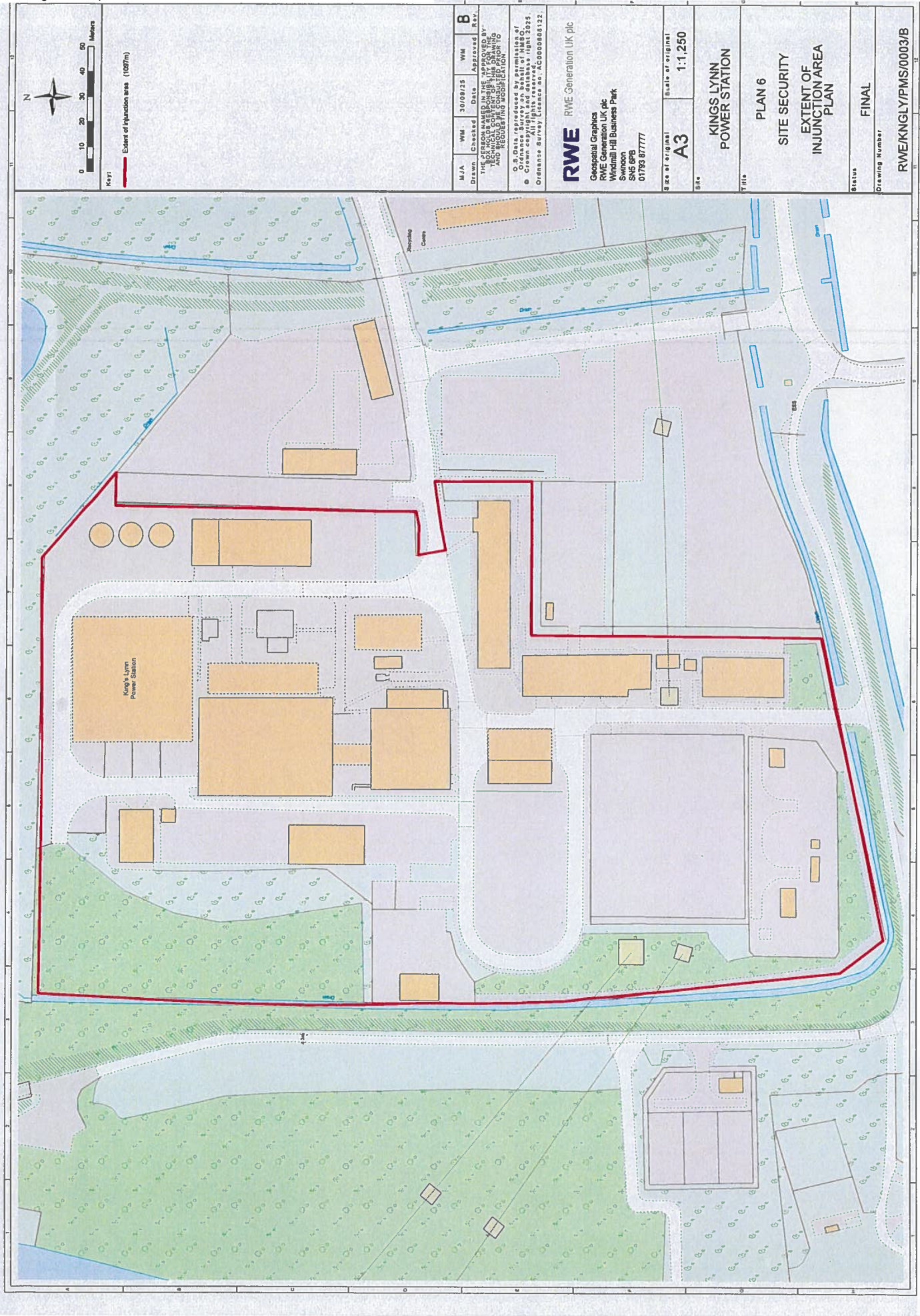
The Court notes and accepts the undertakings given by the Second Defendant recorded above.

Dated: 24 Oct 2025

Judge: Helen Goss

SCHEDULE 1: PLANS 1-6







By Hand

Vincent McGoldrick
38 Peacocks Close
Sudbury
Suffolk
CO10 8DA

Our reference DKA/10002880/O170574179.1/TCU

26 September 2026

Dear Mr McGoldrick,

Claim No: PT-2025-001017

RWE Generation UK Plc v (1) Persons Unknown who without the claimants permission enter or remain upon the premises described in the claim form, or who damage or deface any of those premises or any part of them, for the purposes of protest whether in support of any Greenpeace campaign or otherwise, (2) Greenpeace UK Limited and (3) Greenpeace Limited

We act for RWE Generation UK plc, the "**Claimant**" in the above proceedings. We write to you directly and without prejudice to the Claimant's rights.

1. Background

- 1.1 Our client issued the above referenced Claim for an injunction following an incident involving trespass by 12 protestors at Staythorpe Power Station (the "**Incident**"). We understand that you were one of the 12 trespassers.
- 1.2 On 24 October 2025 the Court granted our client an injunction to prevent further trespass by "Persons Unknown" (the "**Injunction**"). A copy of the Court's order (the "**Order**"), which sets out the terms on which the Court granted the Injunction, is enclosed for ease of reference.
- 1.3 Specifically, by paragraphs 1 and 2 of the Order, the First Defendants are prohibited from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises identified in Plans 1 to 6 to the Order, being the following RWE power station sites (the "**Sites**"):
 - Staythorpe Power Station, Staythorpe, Newark, NG23 5RQ;

Osborne Clarke LLP

One London Wall, London, EC2Y 5EB T +44 207 105 7000 F +44 207 105 7005

Osborne Clarke LLP is a limited liability partnership registered in England and Wales with registered number OC397443 whose registered office is at One London Wall, London EC2Y 5EB. It is authorised and regulated in the UK by the Solicitors Regulation Authority (SRA) and is registered as a recognised body with SRA number 619990.

The term 'partner' refers to a member of Osborne Clarke LLP. A list of members of Osborne Clarke LLP and their professional qualifications is available for inspection at the registered office. Any advice given by any individual member, employee, or consultant is the responsibility of Osborne Clarke LLP and not the individual. Osborne Clarke LLP does not accept service by fax.

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osborneclarke.com

- Didcot Power Station, Didcot, Oxfordshire, OX11 7YU;
- Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS;
- Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT;
- Great Yarmouth Power Station, South Denes Road, Great Yarmouth, NR30 3PY; and
- Kings Lynn Power Station, Kings Lynn, PE34 3RD.

- 1.4 The Order carries a Penal Notice, which means that if a person disobeys the Order or instructs or encourages others to breach it, they may be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

2. **Application for continuation**

- 2.1 We write to inform you that our Client has made a further application to the Court, pursuant to paragraph 3 of the Order, for a review hearing of the Injunction. The review hearing date has not yet been listed, but will take place during the hearing window of 19th to 21st October 2026. Copies of all documents relating to the Review Hearing can be found here: <https://uk.rwe.com/injunction>.

- 2.2 Our Client shall seek the continuation of the Injunction at the Review Hearing.

3. **CPS decision not to prosecute**

- 3.1 We understand that, although you were identified as a participant in the Incident, you were not joined as a named Defendant to the Claim at that time. This was because, following your arrest, you were released subject to bail conditions which were considered sufficient to restrain your conduct in relation to the Sites, and it was therefore not considered necessary to name you as a Defendant.

- 3.2 We are now informed that the Crown Prosecution Service has decided not to proceed with a prosecution in relation to the incident at Staythorpe Power Station. As a consequence, any bail conditions to which you were subject will have fallen away. In those circumstances, there is no longer any external constraint on your conduct in relation to the Sites.

- 3.3 Our client is concerned to ensure that the continued Injunction is properly enforceable against all trespassers known to it. As you are a person known to our client, our client considers that, unless you are willing to give a voluntary undertaking to our client not to commit further trespass, it will be necessary to apply to join you as a named Defendant to the Claim, in order to ensure that the continued Injunction is enforceable against you.

4. **Undertaking**

- 4.1 In order to avoid the need for our Client to make an application to join you as a named Defendant, our client invites you to enter into the undertaking not to commit further trespass on our client's property in the form attached to this letter (the "**Undertaking**"). For your information, the Undertaking is a binding contractual undertaking to our Client on substantially the same terms as the undertakings provided to the Court in these proceedings by Greenpeace UK Limited and Greenpeace Limited last year.

- 4.2 In summary, by providing the Undertaking you would be entering into a binding contractual commitment that you will not enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the Sites.
- 4.3 You should be aware that the Undertaking, once given, constitutes a binding contractual obligation owed to our Client. If you breach the Undertaking, our Client may seek all remedies available at law or in equity, including but not limited to damages and injunctive relief. We therefore strongly advise you to seek independent legal advice before signing and returning the Undertaking.
- 4.4 Please sign and return the enclosed Undertaking to us at the address below by no later than **7 October 2026**.
5. **Consequences of refusing to provide the Undertaking**
- 5.1 Please be aware that if you do not respond to this letter by **4:00pm on Friday 2 October 2026**, or you refuse to provide the requested Undertaking, our Client intends to make an application to join you as a named Defendant to the Claim, in order to ensure that any continued injunction is enforceable against you. Were our Client to take that step, it would also reserve the right to seek its costs of doing so against you.
6. **Next Steps**
- 6.1 We strongly recommend that you:
- (a) read the enclosed Order and the enclosed Undertaking carefully;
 - (b) seek independent legal advice as soon as possible; and
 - (c) sign and return the enclosed Undertaking to us by the deadline specified above.
- 6.2 If you have any questions or wish to discuss this matter, please do not hesitate to contact us. Our contact details are set out below.

Yours faithfully

Osborne Clarke LLP

Osborne Clarke LLP

Address: One London Wall, London, EC2Y 5EB

T +44 207 105 7000

E injunctons@osborneclarke.com

On behalf of: Claimant

Witness: R. J. Smith

No. of witness statement: 1

Exhibit: RJS1

Date made: 01 October 2025

Claim No.

IN THE HIGH COURT OF JUSTICE

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE Generation UK PLC

Claimant

And

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR REMAIN
UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE OR DEFACE ANY
OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES OF PROTEST
WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE**

(2) Greenpeace UK Limited

Defendants

FIRST WITNESS STATEMENT OF RACHEL JANE SMITH

I, Rachel Jane Smith, of Windmill Hill Business Park, Whitehill Way, Swindon SN5 6PB, Senior Solicitor
for RWE Generation UK PLC, state as follows:

1. I make this statement on behalf of the Claimant and in support of the application for an injunction against the Defendants. I am duly authorised to do so.
2. This statement has been prepared following emails and calls with the Claimant's solicitors.
3. The facts and matters set out in this statement are within my own knowledge, unless otherwise stated and from information provided to me by others. Where facts are within my knowledge, I confirm that they are true. Where the facts were supplied by others, or are derived from documents, this is indicated and I confirm that they are true to the best of my knowledge, information and belief. In particular, all references to the plans that identify the locations of the security fences for each of the power stations, and the references to the Little Barford Footbridge (as defined below), are derived from discussions with Wayne McNally, Senior Property Surveyor for the Claimant.
4. I have read the Particulars of Claim and the final draft of the witness statement of Will Jeffery for the Claimant.
5. I now refer to a paginated bundle of documents marked Exhibit "**RJS1**" containing true copies of the documents to which I shall refer in this witness statement. References in this witness statement to page numbers in Exhibit "**RJS1**" are in the format "**RJS1/page(s)**". A list of the documents I have referred to, and have been referred to, for the purposes of this statement, is included at the start of **RJS1**.
6. In this statement, I set out:
 - 6.1 a description of the six power stations known as: Staythorpe Power Station, Didcot Power Station, Pembroke Power Station, Little Barford Power Station, Great Yarmouth Power Station and Kings Lynn Power Station over which the Claimant is seeking injunctive relief; and
 - 6.2 the title ownership structure of those power stations.
7. A list of the addresses for each of the six power stations is set out below:

Power Station	Address
Staythorpe Power Station	Staythorpe, Newark NG23 5PS
Didcot Power Station	Didcot, Oxfordshire OX11 7YS
Pembroke Power Station	Pembroke, West Pennar, Dyfed SA71 5SS

Little Barford Power Station	Little Barford, St Neots, Huntingdon, Cambridgeshire PE19 6YT
Great Yarmouth Power Station	South Denes Road, Great Yarmouth NR30 3PY
Kings Lynn Power Station	King's Lynn PE34 3RD

8. I have considered the title documents in the exhibit marked in **RJS1** and conclude as follows:

8.1 the Claimant owns outright the freehold interest in the power stations themselves (i.e, the land on which the assets are constructed);

8.2 for the most part the Claimant also owns the surrounding curtilage on the same basis, at least up to the extent of the perimeter fences drawn on the various plans. That is subject to a number of exceptions, consisting of:

(1) areas of land demised to or in some cases owned outright by utility undertakers and the like;

(2) areas where title is not registered or is in the process of being registered; and

(3) areas where, in the time available, I have not been able to satisfy myself of the Claimant's title and which for present purposes I assume to be "third party areas"

(together the "**Third Party Areas**"). These complexities are set out in more detail in my comments below.

9. Where I refer to current title plans that are not immediately available from HM Registry, the Claimant does, in all but one case and where the Claimant has instead obtained an extract from HM Land Registry's MapSearch function, hold copies of title plans that have been obtained previously, as indicated. Having reviewed the historic title plans and the MapSearch extract against a current version of the corresponding register of title, I am not aware of any factors that would have caused the plans to materially alter, save for any pending applications or leasehold interests, as indicated.

Staythorpe Power Station

10. The Claimant is the registered freehold owner of land known as Staythorpe Power Station, Averham NG23 5RQ and registered at HM Land Registry under freehold title number NT349128 (the "**Staythorpe Power Station Land**"). A copy of the title register is included at

RJS1/[1-3]. The title plan is not immediately available from HM Land Registry, but I have enclosed a historic copy at **RJS1/[4]**, in line with paragraph 9, above.

11. The Staythorpe Power Station Land comprises an active power plant, which is surrounded by a security perimeter fence. The area over which the Claimant is seeking injunctive relief follows this security perimeter fence and I refer to this as the **"Staythorpe Power Plant"**.
12. I refer to Plan 1A enclosed at **RJS1/[5]** and comment as follows:
 - 12.1 the Staythorpe Power Plant (being the land over which injunctive relief is sought) is shown edged hashed black;
 - 12.2 the wider Staythorpe Power Station Land is shown edged red; and
 - 12.3 the Staythorpe Leases (as defined below) are shown hatched blue.
13. I refer also to Plan 1 enclosed at **RJS1/[6]**, which shows the Staythorpe Power Plant (being the land over which injunctive relief is sought) shown edged red.
14. In relation to the title register for the Staythorpe Power Station Land (of which the Staythorpe Power Plant forms part), I comment as follows:
 - 14.1 the registered proprietor is listed as RWE Npower PLC, being a company name used previously by the Claimant. An extract from Companies House showing a list of the Claimant's previous company names is included at **RJS1/[7-8]**; and
 - 14.2 the title register is backdated, with one pending application at HM Land Registry with the reference Q980SQT (the **"Staythorpe Pending Application"**). This relates to an application lodged by the Claimant to close a leasehold interest which has now been incorporated into the Claimant's freehold title. An extract from HM Land Registry showing the pending application is included at **RJS1/[9]**.
15. In relation to leasehold interests (the **"Staythorpe Leases"**), there are two registered leases granted out of the Staythorpe Power Station Land title and which fall wholly within the Staythorpe Power Plant, as follows:
 - 15.1 leasehold title number NT372031, being land at Staythorpe Power Station, Staythorpe. The registered proprietor is National Gas Transmission PLC, with registered company number 2006000. Copies of the title register and title plan are included at **RJS1/[10-14]**; and
 - 15.2 leasehold title number NT409895, being land at Staythorpe Power Station, Staythorpe Road, Staythorpe. The registered proprietor is National Grid Electricity Transmission

PLC, with registered company number 02366977. Copies of the title register and title plan are included at **RJS1/[15-19]**.

There is a third lease (leasehold title number NT421944) granted out of the Staythorpe Power Station Land which is not included on the freehold title register and which sits partly within, and partly outside, the Staythorpe Power Plant. I comment as follows:

- 15.3 the registered proprietor is National Grid Electricity Transmission PLC. No registered company number information is provided on the title register. A copy of the title register is included at **RJS1/[20-22]**. The title plan is not immediately available from HM Land Registry but I have enclosed a historic copy at **RJS1/[23]**, in line with paragraph 9 above;
 - 15.4 this is the leasehold title which is subject to the Staythorpe Pending Application referred to above; and
 - 15.5 the building once erected on this leasehold demise has now been demolished.
16. The land and facilities within the areas demised by the Staythorpe Leases (with the exception of NT421944, where the building has now been demolished) are, in practice, integral to the overall functioning of the Staythorpe Power Plant. It would not be apparent to any person, who was not already aware of the leasehold demise, that these areas were not part and parcel of the Staythorpe Power Plant.

Didcot Power Station

17. The Claimant is:
- 17.1 the registered freehold owner of land known as Didcot Power Station, Didcot and Land on the South side of Hobbyhorse Road, Sutton Courtenay and registered at HM Land Registry under freehold title numbers ON157852 and BK69895 respectively; and
 - 17.2 the registered leasehold owner of land known as Gatehouse, Didcot Power Station, Purchas Road, Didcot and registered at HM Land Registry under leasehold title number ON322203

(the "**Didcot Power Station Land**"). Copies of the title register and plan for ON322203 are included at **RJS1/[24-29]**. A copy of the title register for BK69895 is included at **RJS1/[30-32]**. The title plan for BK69895 is not immediately available from HM Land Registry, but I have enclosed a historic copy at **RJS1/[33-34]**, in line with paragraph 9 above. The title register and plan for ON157852 are not immediately available from HM Land Registry, but I have enclosed historic copies at **RJS1/[35-46]**, in line with paragraph 9 above.

18. The Didcot Power Station Land comprises an operational power plant and non-operational land, which are surrounded by a primary security perimeter fence. I refer to this as the **"Didcot Power Plant"**.
19. I refer to Plan 2A enclosed at **RJS1/[47]** and comment as follows:
 - 19.1 the Didcot Power Plant is shown edged hashed black;
 - 19.2 the freehold part of the wider Didcot Power Station Land is shown edged red;
 - 19.3 the Didcot Leases (as defined below) are shown hatched blue. Please note that two of the Didcot Leases (leasehold titles ON191378 and ON297164) are shown together in the area hatched blue and labelled "Electricity Distribution Site";
 - 19.4 the area of non-operational land is shown hatched violet is subject to a prospective sale (the **"Didcot Sale Land"**), as referred to below; and
 - 19.5 the area of operational land is shown hatched light brown and edged hashed yellow (the **"Operational Site"**) and is the land over which injunctive relief is sought.
20. I refer also to Plan 2 enclosed at **RJS1/[48]** which shows the Operational Site (being the land over which injunctive relief is sought) shown edged red.
21. In relation to the Didcot Sale Land, this comprises part of the Claimant's freehold title ON157852 (the **"Didcot Freehold Sale Land"**) and the whole of the Claimant's leasehold title ON322203 (the **"Didcot Leasehold Sale Land"**). The Claimant is in the process of selling the Didcot Freehold Sale Land by way of transfer of part of freehold title ON157852 and the Didcot Leasehold Sale Land by way of a lease assignment.
22. A section of the primary security perimeter fence is located on the eastern and southern sides of the Didcot Sale Land. Accordingly, if the sale of the Didcot Sale Land goes ahead, this section of the primary security perimeter fence will no longer be in the ownership of the Claimant and so, following the sale of the Didcot Sale Land, the Claimant will rely on the secondary security fence (which is shown hatched in purple) to secure the Operational Site.
23. In relation to the title registers for the Didcot Power Station Land (of which the Didcot Power Plant forms part), I comment as follows:
 - 23.1 on BK69895, the registered proprietor is listed as RWE Npower PLC, being a company name used previously by the Claimant. I refer to paragraph 14.1 above; and

23.2 on ON157852, the title register is backdated, with six pending applications at HM Land Registry. Only one of these pending applications (reference W187GYT) relates to the Operational Site, as follows:

- (1) reference W187GYT concerns an application to protect easements relating to the entirety of the Didcot Power Station Land. An extract from HM Land Registry showing the pending application is included at **RJS1/[49]**.

The remaining pending applications concern land falling outside the Operational Site.

24. In relation to leasehold interests, there are six registered leases granted out of freehold title ON157852. Whilst the title register states that there are seven registered leases, entries 1 and 5 refer to the same leasehold title. Three of the six registered leases fall wholly within the Operational Site (the "**Didcot Leases**"), and three (ON210652, ON191379 and ON282200) fall wholly outside the Operational Site. I provide further detail on the three Didcot Leases as follows:

24.1 leasehold title number ON191378, being land and buildings at Didcot Power Station, Didcot. The registered proprietor is National Grid Electricity Transmission PLC with registered company number 2366977. Copies of the title register and title plan are included at **RJS1/[50-54]**;

24.2 leasehold title number ON297164, being land at Didcot Power Station, Didcot. The registered proprietor is National Grid Electricity Transmission PLC with registered company number 2366977. Copies of the title register and title plan are included at **RJS1/[55-59]**; and

24.3 leasehold title number ON194931, being land on the north side of Milton road. The registered proprietor is National Gas Transmission PLC with registered company number 2006000. Copies of the title register and title plan are included at **RJS1/[60-64]**.

25. The land and facilities within the areas demised by the Didcot Leases are, in practice, integral to the overall functioning of the Didcot Power Plant. It would not be apparent to any person, who was not already aware of the leasehold demise, that these areas were not part and parcel of the Didcot Power Plant.

Pembroke Power Station

26. The Claimant is the registered freehold owner of:

26.1 Greenhill Farm and adjoining Land, Pwllcrochan, Pembroke (SA71 5TJ);

26.2 Pembroke Power Station, Pembroke;

26.3 Land at Pembroke Power Station, Pembroke (SA71 5SS); and

26.4 Land On The North Side Of Greenhill Farm, Pwllcrochan, Pembroke

and registered at HM Land Registry under freehold title numbers CYM399739, WA962157, CYM768801 and CYM12566 respectively (the **"Pembroke Power Station Land"**). Copies of all four title registers and a copy of the title plan for CYM768801 are included at **RJS1/[65-83]**. The title plans for WA962157, CYM12566 and CYM399739 are not immediately available from HM Land Registry, but I have enclosed historic copies of WA962157 and CYM399739 at **RJS1/[84-99]**, in line with paragraph 9 above. I do not hold a historic copy of the title plan for CYM12566 but have included an extract from HM Land Registry's MapSearch function, showing the extent of CYM12566, at **RJS1/[100-101]**, in line with paragraph 9 above.

27. The Pembroke Power Station Land comprises:

27.1 an active power plant and a net zero centre, which are surrounded by a security perimeter fence; and

27.2 a construction site immediately abutting the south west of the perimeter fence (the **"Construction Land"**), which is surrounded by a separate fence (the **"Construction Land Fence"**) and on which:

(1) existing operational infrastructure is located; and

(2) additional operational infrastructure is being constructed, which will become operational in the near future.

On completion of the construction work on the Construction Land, the security perimeter fence will be extended to include the Construction Land.

28. The area over which the Claimant is seeking injunctive relief follows this security perimeter fence and Construction Land Fence. I refer to this area as the **"Pembroke Power Plant"**.

29. I refer to Plan 3A enclosed at **RJS1/[102]** and comment as follows:

29.1 the Pembroke Power Plant (being the land over which injunctive relief is sought) is shown edged hashed black;

29.2 the wider Pembroke Power Station Land is shown edged red; and

29.3 the Pembroke Leases (as defined below) are shown hatched blue.

30. I refer also to Plan 3 enclosed at **RJS1/[103]**, which shows the Pembroke Power Plant (being the land over which injunctive relief is sought) shown edged red.
31. In relation to the title registers for the Pembroke Power Station Land (of which the Pembroke Power Plant forms part), I comment as follows:
- 31.1 on CYM399739, the registered proprietor is listed as RWE Npower PLC, being a company name used previously by the Claimant. I refer to paragraph 14.1 above;
- 31.2 on WA962157, the title register is backdated, with four pending applications at HM Land Registry. Only one of these pending applications (reference C019LTS) relates to the Pembroke Power Plant and concerns an application for an option for an easement over Pembroke Power Plant. An extract from HM Land Registry showing the pending application is included at **RJS1/[104]**. The remaining pending applications concern land falling outside the Pembroke Power Plant; and
- 31.3 on CYM768801, the title register is backdated, with two pending applications at HM Land Registry. Both these pending applications concern land falling outside the Pembroke Power Plant.
32. In relation to leasehold interests, there are seven registered leases granted out of the Pembroke Power Station Land title (two granted out of freehold number CYM399739 and five granted out of freehold number WA962157). All leases fall outside the Pembroke Power Plant.

Little Barford Power Station

33. The Claimant is the registered freehold owner of land known as Little Barford Power Station, Barford Road, Little Barford PE19 6YT and registered at HM Land Registry under freehold title number BD214443 (the "**Little Barford Power Station Land**"). A copy of the title register is included at **RJS1/[105-109]**. The title plan is not immediately available from HM Land Registry, but I have enclosed a historic copy at **RJS1/[110]**, in line with paragraph 9, above.
34. The Little Barford Power Station Land comprises an active power plant, which is surrounded by a security perimeter fence. The area over which the Claimant is seeking injunctive relief follows this security perimeter fence, and the Little Barford Footbridge (defined below), and I refer to this as the "**Little Barford Power Plant**".
35. I refer to Plan 4A enclosed at **RJS1/[111]** and comment as follows:
- 35.1 the Little Barford Power Plant (being the land over which injunctive relief is sought) is shown edged hashed black;
- 35.2 the wider Little Barford Power Station Land is shown edged red;

- 35.3 the Little Barford Footbridge (defined below) is shown hatched blue; and
- 35.4 the Little Barford Lease (defined below) is shown hatched blue.
36. I refer also to Plan 4 enclosed at **RJS1/[112]**, which shows the Little Barford Power Plant (being the land over which injunctive relief is sought) shown edged red.
37. I am aware that the eastern and western sections of the Little Barford Power Station Land sit on either side of a public highway (known as Barford Road) and that there is a footbridge approximately half way along the public highway, which connects the two sections of the Little Barford Power Plant (the "**Little Barford Footbridge**").
38. The Little Barford Footbridge provides the Claimant's employees and lawful visitors with a safe means of moving between the eastern and western sections of the Little Barford Power Plant. Little Barford Footbridge is accessed from within the perimeter fencing of the site on the eastern and western sides of Barford Road. Access to and from the eastern end of the Little Barford Footbridge is restricted by a turnstile located in the Little Barford Power Plant. There is no restriction on access from within the Little Barford Power Plant on the western side of the road. There is a handrail along the Little Barford Footbridge but there is no security fencing along the bridge itself.
39. The Little Barford Footbridge is a Third Party Area. However, injunctive relief is also sought in relation to the Little Barford Footbridge on the basis that:
- 39.1 it does not have security fencing and so could be vulnerable to being accessed from Barford Road with the use of a ladder or other climbing equipment; and
- 39.2 in the event that trespassers gained access to Little Barford Footbridge, then:
- (1) they would be able to gain unrestricted access to the western section of the Little Barford Power Plant; and
- (2) they may be able to gain access to the eastern section of the Little Barford Power Plant by (for instance) forcing open the turnstiles or scaling the turnstile building.
40. In relation to the title register for the Little Barford Power Station Land (of which the Little Barford Power Plant forms part), I comment as follows:
- 40.1 the registered proprietor is listed as RWE Npower PLC, being a company name used previously by the Claimant. I refer to paragraph 14.1 above; and
- 40.2 the title register is backdated, with one pending application at HM Land Registry with the reference X911FXT. This relates to an underlease in favour of On Tower UK

Limited, which is within the demise of the Little Barford Lease (defined below). An extract from HM Land Registry showing the pending application is included at **RJS1/[113]**.

41. In relation to leasehold interests, there is one registered lease granted out of the Little Barford Power Station Land title and which falls partly within and partly outside the Little Barford Power Plant (the "**Little Barford Lease**"), as follows:
 - 41.1 leasehold title number BD168495, being land at Little Barford Power Station. The registered proprietor is Eastern Power Networks PLC, with registered company number 2366906. Copies of the title register and title plan are included at **RJS1/[114-117]**.
42. There are two further leasehold interests (leasehold title numbers BD287002 and BD313633) granted out of the Little Barford Power Station Land. Both of these sit outside the Little Barford Power Plant.
43. The land and facilities within the area demised by the Little Barford Lease is, in practice, integral to the overall functioning of the Little Barford Power Plant. It would not be apparent to any person, who was not already aware of the leasehold demise, that this area was not part and parcel of the Little Barford Power Plant.

Great Yarmouth Power Station

44. The Claimant is the registered freehold owner of land at South Denes Power Station, South Denes Road, Great Yarmouth NR30 3PY and registered at HM Land Registry under freehold title number NK166277 (the "**Great Yarmouth Power Station Land**"). A copy of the title register is included at **RJS1/[118-121]**. The title plan is not immediately available from HM Land Registry, but I have enclosed a historic copy at **RJS1/[122]**, in line with paragraph 9 above.
45. The Great Yarmouth Power Station Land comprises an active power plant, which is surrounded by a security perimeter fence. The area over which the Claimant is seeking injunctive relief follows this security perimeter fence and I refer to this as the "**Great Yarmouth Power Plant**".
46. I refer to Plan 5A enclosed at **RJS1/[123]** and comment as follows:
 - 46.1 the Great Yarmouth Power Plant (being the land over which injunctive relief is sought) is shown edged hashed black;
 - 46.2 the wider Great Yarmouth Power Station Land is shown edged red; and
 - 46.3 the Great Yarmouth Leases (as defined below) are shown hatched blue.

47. I refer also to Plan 5 enclosed at **RJS1/[124]**, which shows the Great Yarmouth Power Plant (being the land over which injunctive relief is sought) shown edged red.
48. In relation to the title register for the Great Yarmouth Power Station Land (of which the Great Yarmouth Power Plant forms part), the registered proprietor is listed as RWE Npower PLC, being a company name used previously by the Claimant. I refer to paragraph 14.1 above.
49. In relation to leasehold interests (the "**Great Yarmouth Leases**"), there are two registered leases granted out of the Great Yarmouth Power Station Land title and which fall wholly within the Great Yarmouth Power Plant, as follows:
- 49.1 leasehold title number NK363229, being Substation, South Denes Road, Great Yarmouth. The registered proprietor is Eastern Power Networks PLC, with registered company number 2366906. Copies of the title register and title plan is included at **RJS1/[125-129]**; and
- 49.2 leasehold title number NK363233, being the tunnel and access shaft on the east side of South Denes Road, Great Yarmouth. The registered proprietor is Eastern Power Networks PLC, with registered company number 2366906. Copies of the title register and title plan is included at **RJS1/[130-133]**.
50. The land and facilities within the areas demised by the Great Yarmouth Leases are, in practice, integral to the overall functioning of the Great Yarmouth Power Plant. It would not be apparent to any person, who was not already aware of the leasehold demise, that these areas were not part and parcel of the Great Yarmouth Power Plant.

Kings Lynn Power Station

51. The Claimant is the registered freehold owner of land known as Kings Lynn Power Station, King's Lynn PE34 3RD and registered at HM Land Registry under freehold title numbers NK108157 and NK271060 (the "**Kings Lynn Power Station Land**"). Copies of the title registers for both NK108157 and NK271060, and the title plan for NK108157, are included at **RJS1/[135-144]**. The title plan for NK271060 is not immediately available from HM Land Registry, but I have enclosed a historic copy at **RJS1/[145]**, in line with paragraph 9, above.
52. The Kings Lynn Power Station Land comprises an active power plant, which is surrounded by a security perimeter fence. The area over which the Claimant is seeking injunctive relief follows this security perimeter fence and I refer to this as the "**Kings Lynn Power Plant**".
53. I refer to Plan 6A enclosed at **RJS1/[146]** and comment as follows:
- 53.1 the Kings Lynn Power Plant (being the land over which injunctive relief is sought) is shown edged hashed black;

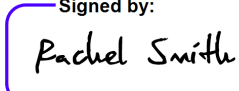
- 53.2 the wider Kings Lynn Power Station Land is shown edged red;
 - 53.3 the Kings Lynn Third Party Land (as defined below and being a Third Party Area) is shown hatched blue;
 - 53.4 the Indeterminate Ownership Land (as defined below and being a Third Party Area) is shown hatched blue; and
 - 53.5 the Kings Lynn Lease (as defined below) is shown hatched blue.
54. I refer also to Plan 6 enclosed at **RJS1/[147]**, which shows the Kings Lynn Power Plant (being the land over which injunctive relief is sought) shown edged red.
55. There are slight discrepancies where the boundary of the Kings Lynn Power Plant extends beyond the boundary of the Kings Lynn Power Station Land (the "**Indeterminate Ownership Land**"). I consider these small areas of land, extending beyond the Kings Lynn Power Station Land, to be Third Party Areas.
56. In relation to third-party freehold interests, there is a separate freehold interest which falls within the Kings Lynn Power Station Land (the "**Kings Lynn Third-Party Land**"), as follows:
- 56.1 freehold title number NK218673, being land to the North of North Sea Bank, Willows Business Park, King's Lynn. The registered proprietor is Eastern Power Networks PLC, with registered company number 2366906. Copies of the title register and title plan are included at **RJS1/[148-151]**. I consider this area to also be a Third Party Area.
57. In relation to leasehold interests, there is one lease which falls wholly within the Kings Lynn Power Plant (the "**Kings Lynn Lease**"), as follows:
- 57.1 leasehold title number NK179596, being land at Willows Business Park, High Road, South Lynn. The registered proprietor is National Gas Transmission PLC, with registered company number 2006000. Copies of the title register and title plan are included at **RJS1/[152-154]**.
58. The land and facilities within the areas demised by the Indeterminate Ownership Land, the Kings Lynn Third-Party Land and the Kings Lynn Lease are within, and are only accessible across, land to which the Claimant has an unencumbered right of possession. In practice, access is controlled by the Claimant in the same way as it is for persons travelling to / visiting the Kings Lynn Power Plant itself, and any rights that are enjoyed by the registered proprietors are related to the operation of the Kings Lynn Power Plant.

General

59. I understand that the purpose of this witness statement is to set out matters of fact of which I have personal knowledge. I understand that it is not my function to argue the case, either generally or on particular points, or to take the court through the documents in the case.

CONFIRMATION OF COMPLIANCE

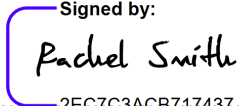
This witness statement sets out only my personal knowledge and recollection, in my own words. On points that I understand to be important in the case, I have stated honestly (a) how well I recall matters and (b) whether my memory has been refreshed by considering documents, if so how and when. I have not been asked or encouraged by anyone to include in this statement anything that is not my own account, to the best of my ability and recollection, of events I witnessed or matters of which I have personal knowledge.

Signed by:

Signed: ...2EC7G3ACB717437...

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.

Dated: 01 October 2025
.....

Signed by:

Signed:2EC7C3ACB717437.....
Rachel Jane Smith
Full name:

CERTIFICATE OF COMPLIANCE

1. I am the relevant legal representative within the meaning of Practice Direction 57AC.
2. I am satisfied that the purpose and proper content of trial witness statements, and proper practice in relation to their preparation, including the witness confirmation required by paragraph 4.1 of Practice Direction 57AC, have been discussed with and explained to Rachel Jane Smith.
3. I believe this trial witness statement complies with Practice Direction 57AC and paragraphs 18.1 and 18.2 of Practice Direction 32, and that it has been prepared in accordance with the Statement of Best Practice contained in the Appendix to Practice Direction 57AC.

DocuSigned by:

Signed:7B6F9F121CCF411...
Carl Roche
Name:
Partner
Position:
1 October 2025
Date:

On behalf of: Claimant
Witness: William Henry Jeffery
No. of witness statement: 1
Exhibit(s): WHJ1
Date made: ~~30 September 2025~~
1 October 2025

Claim No.

IN THE HIGH COURT OF JUSTICE

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE Generation UK PLC

Claimant

And

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION
ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR
WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM,
FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY
GREENPEACE CAMPAIGN OR OTHERWISE**

(2) Greenpeace UK Limited

Defendants

FIRST WITNESS STATEMENT OF WILLIAM HENRY JEFFERY

I, William Henry Jeffery of Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire SN5 6PB am the Head of Asset Management for RWE Generation UK PLC and have been in this role since April 2021. I have worked for the Claimant and its predecessor companies since September 1987. I state as follows:

1. I make this statement on behalf of the Claimant and in support of the application for an injunction against the Defendants. I am duly authorised to do so.
2. This statement has been prepared following emails and calls with the Claimant's solicitors.
3. The facts and matters set out in this statement are within my own knowledge, unless otherwise stated and from information provided to me by others. Where facts are within my knowledge, I confirm that they are true. Where the facts were supplied by others, or are derived from documents, this is indicated and I confirm that they are true to the best of my knowledge, information and belief. In particular, paragraphs 28, 48, 59 – 60, 98.4, 103 and 107 are derived from discussions with the Claimant's solicitors. Paragraphs 21, 74 and 93 are derived from discussions with my colleagues.
4. I have read the Particulars of Claim and the final drafts of the witness statement of Rachel Smith for the Claimant.
5. A list of documents is set out at the beginning of a paginated bundle of documents marked Exhibit "**WHJ1**". This list identifies the documents to which I refer or which have been referred to me for the purposes of providing evidence in this witness statement. The documents themselves are true copies of the documents to which I shall refer in this witness statement. References in this witness statement to page numbers in Exhibit "**WHJ1**" are in the format "**[WHJ1/page(s)]**".

RWE's infrastructure

6. The Claimant is part of the RWE group of companies, which produces electricity in the United Kingdom from operational sites in different locations, and by a variety of means, including onshore and offshore wind, solar, hydro, biomass and gas.
7. Of these operational sites, 10 are gas-fuelled power stations (the "**Gas Power Stations**"). I have read the witness statement of Rachel Smith and note she has listed six of the Gas Power Stations in respect of which the Claimant is seeking an injunction, which for completeness I set out in the following table:

Power Station	Capacity (gross/generated) per day (megawatts)
Staythorpe	1,787
Didcot B	1,607 ¹
Pembroke	2,243
Little Barford	755 ²
Great Yarmouth	430
Kings Lynn	395
Total gross capacity	7,217

8. For the purposes of this witness statement, I will refer to the six Gas Power Stations listed above in paragraph 7 as the "**Large Power Stations**".

9. I set out the four remaining Gas Power Stations in the following table:

Power Station	Capacity (gross/generated) per day (megawatts)
Cheshire	67
Cowes	143
Hythe	47
Grimsby A & B	40
Total gross capacity	297

¹ Total combined capacity in MW of 1,505 MW output for CCGT and 102 MW output of OCGT. Please see paragraph 16 for further details.

² Total combined capacity in MW of CCGT and OCGT. Please see paragraph 18 below for further details.

10. For the purposes of this witness statement, I will refer to these four Gas Power Stations as the "**Small Power Stations**".
11. As can be seen from a comparison of the total gross capacity for the two types of Gas Power Stations, the Small Gas Power Stations produce a significantly smaller amount of electricity than the Large Gas Power Stations. As will be explained in further detail later in this witness statement, any protestor action that required the Claimant to reduce or stop the generation of electricity at any of the Large Gas Power Stations would – by virtue of their size, the amount of on-site infrastructure they have, and the amount of electricity they generate – result in (a) the Claimant not being able to generate electricity, (b) the Claimant not being able to honour the sale of electricity purchased in advance, potentially causing it to suffer losses of millions of pounds, (c) the Claimant incurring potentially significant costs in having to repair any damage caused to the on-site infrastructure, and (d) significant and substantial disruption to the UK's national electricity system.
12. Whilst protestor action at the Small Gas Power Stations would obviously still cause the Claimant to suffer disruption and potentially result in the Claimant suffering losses, by virtue of their size, this disruption would not be as significant or as substantial as would be suffered by the Large Gas Power Stations. Accordingly, the Claimant has sought to take a proportionate approach in terms of the relief sought at this point in time, by focussing it specifically on the Large Gas Power Stations, which are considered to be at greater risk of protestor action and where the potential for disruption to the national electricity system would be more significant.

Staythorpe

13. The largest of the Large Power Stations in England is the Staythorpe Power Plant. I am familiar with the Staythorpe Power Plant as I regularly visit it. The Claimant has owned the freehold interest in the Property since 2 May 2000.
14. The Staythorpe Power Plant is a gas-fired, combined-cycle gas turbine facility ("**CCGT**") that commenced commercial operations towards the end of 2010.
15. The Staythorpe Power Plant is enclosed by a perimeter security fence (palisade) of approximately 2.8 metres in height with trident anti-climb topping. The fence line and critical assets within the Staythorpe Power Plant are monitored by CCTV operated by the Claimant's local security team.

Didcot B

16. Didcot Power Plant comprises an open cycle gas turbine (“**OCGT**”) and a CCGT. The Didcot Power Plant is wholly surrounded by a secure perimeter weldmesh fence of approximately 2.8 metres in height, with barbed wire anti-climb topping (in certain areas). The fence line and critical assets within the Didcot Power Plant are monitored by CCTV operated by the Claimant's local security team.

Pembroke

17. Pembroke Power Plant includes the Pembroke CCGT and the Pembroke Net Zero Centre. It is wholly surrounded by a secure perimeter fence (palisade) of approximately 2.8 metres in height with trident anti-climb topping. The fence line and critical assets within the Pembroke Power Plant are monitored by CCTV operated by the Claimant's local security team.

Little Barford

18. Little Barford Power Plant comprises a CCGT and an OCGT. It is situated on two sites, separated by a public highway. Each of the sites is wholly surrounded by a secure perimeter chain-link fence with barbed-wire anti-climb topping. The two sites are linked by a pedestrian bridge over Barford Road. The fence line and critical assets within the Little Barford Power Plant are monitored by CCTV operated by the Claimant's local security team.

Great Yarmouth

19. Great Yarmouth Power Plant is a CCGT which has been operated by the Claimant since 2002. It is wholly surrounded by a secure perimeter fence. The fence line and critical assets within the Great Yarmouth Power Plant are monitored by CCTV operated by the Claimant's local security team.

Kings Lynn

20. Kings Lynn Power Plant is CCGT which has been operated by the Claimant since 2020. It is wholly surrounded by a secure perimeter chain-link fence with barbed wire anti-climb topping and steel pole gating. The fence line and critical assets within the Kings Lynn Power Plant are monitored by CCTV operated by the Claimant's local security team.

Incident at Staythorpe on 22 September 2025

21. I am aware of the following matters from contemporaneous internal reports and communications provided by colleagues during and after the incident (the "Incident").
22. At approximately 6:00am on Monday 22 September 2025, eight trespassers gained entry to the Staythorpe Power Plant by scaling the perimeter fence using ladders and by placing carpet over the anti-climb topping.
23. After entering the site, the trespassers ascended stairs adjoining two 75m high gas turbine "stacks" in order to reach a steel gantry situated more than halfway up those stacks. They then displayed banners identifying the protesters as acting in conjunction with Greenpeace, including one stating "The Great Gas Rip-Off – Now On". I exhibit photographs of the trespassers on the gantry and of the banners at [WJ/1-48].
24. The trespassers were equipped with facemasks, respirators and climbing equipment. Three out of four gas turbines were operational at the time.
25. At approximately 10:30am on Monday 22 September 2025, four of the protesters descended from the gantry and were arrested by the police.
26. The remaining four protesters came down later that afternoon and were also arrested. On Tuesday 23 September 2025, a further four individuals were arrested on suspicion of interfering with the use / operation of key national infrastructure.
27. All twelve individuals have now been released on conditional bail. I exhibit at [WHJ1/49-51] a news publication from Nottinghamshire Police's website confirming this.
28. I understand from having discussed with the Claimant's solicitors that the relevant bail conditions include an obligation not to enter any premises which constitute downstream oil infrastructure, onshore oil, gas exploration, production infrastructure, onshore electricity generation infrastructure.

Greenpeace

29. Greenpeace is an independent global campaigning network, founded in Canada in 1971 by a group of environmental activists. It is comprised of a global network of

25 independent national/regional organisations in over 55 countries across Europe, the Americas, Africa, Asia and the Pacific. It also has a co-ordinating body, Greenpeace International.

30. According to its international website, a part of Greenpeace's mission is to *"prevent pollution and abuse of the earth's ocean, land, air and fresh water"* (I exhibit the relevant excerpt at [WHJ1/52-57]), and it uses non-violent, direct action to try to achieve its aims.
31. One of Greenpeace's most notable and publicised direct action campaigns was a series of protests in relation to the now-decommissioned coal-fired Kingsnorth Power Station on the Hoo Peninsula at Medway in Kent. On 8 October 2007, 50 Greenpeace protesters carried out a protest after breaking into Kingsnorth. I have seen a publication written on the same day as this protest, archived from Greenpeace's website, which I exhibit at [WHJ1/58]. It says one group of protesters immobilised the conveyer belt that carried coal to the station and then chained themselves to the machinery, whilst a second group climbed up the chimney *"with supplies to hold it for several days and force the power station off the national grid"*. The protesters actually daubed "Gordon" (in reference to the UK's then prime minister Gordon Brown) in white paint down the chimney, and forced the station to shut down. Less than a year later in August 2008, Greenpeace was then involved in the "Camp for Climate Action" at Kingsnorth – a campaign gathering to draw attention to plans by E-On UK (the station's owner) to build a replacement, but also coal-fired, power station. Then, on 29 October 2008, 30 Greenpeace protesters gained entry to part of Kingsnorth using boats, climbed a ladder to a small concrete island, which was then cut off by the falling tide. I exhibit a Guardian newspaper article about this at [WHJ1/59-60]. Finally, on 22 June 2009, 10 Greenpeace protesters boarded a coal freighter and prevented it from unloading its cargo at the planned site for what was then intended to be the new Kingsnorth station. I also exhibit a Guardian newspaper article about this at [WHJ1/61-63].
32. More recently, on 25 July 2025, Greenpeace protesters abseiled from the Forth Road Bridge in east central Scotland to block petrochemical company INEOS' tanker "Independence" from delivering its freight of fracked gas to its Grangemouth plant. 10 protesters were arrested. I exhibit a BBC News article about this at [WHJ1/64-72].

Discussions with Greenpeace

33. On 4 September 2025, Greenpeace, together with the strategy firm Stonehaven, published a report entitled "Power Shift – How the Labour government can bring down bills and bolster net zero by curtailing the power of gas" (the "**Report**"). I exhibit a copy of the Report at [WHJ1/73-112]. The Report includes a recommendation (at page 4 of the Report or page 76 of [WHJ1]) to "*stop gas setting the price [that consumers] pay for electricity and control the negative impacts of gas in the electricity market*".
34. Following publication of the Report, I understand that representatives of Greenpeace approached RWE to arrange a meeting to discuss Greenpeace's concerns. I further understand that a meeting took place on 16 September 2025 between Areeba Hamid and Will McCallum, co-executive directors of Greenpeace, and Tom Glover, RWE UK's Country Chair and Chair of the RWE UK Renewables Boards (the "**Meeting**").
35. In a conversation I had with Tom Glover recently, he said that he had considered the Meeting to have been constructive, and that a further meeting was scheduled for 24 September 2025 (the "**Follow-Up Meeting**"). However, prior to the Follow-Up Meeting, the Incident occurred on 22 September 2025, as described in paragraphs **21-28** above.

Correspondence with Greenpeace following the Incident

36. On 22 September 2025, emails were exchanged between Ms Hamid and Mr McCallum and Mr Glover. At 12:02, Ms Hamid and Mr McCallum wrote to give Mr Glover a "*heads up*" and described the action as taken "*in typical Greenpeace style*". The email stated that the activists involved in the Incident "*will leave as soon as the protest is over*" and "*do not intend to stay and disrupt operations for longer than necessary to make [Greenpeace's] point*".
37. At 13:12 on 22 September 2025, Mr Glover responded, recording RWE's disappointment at Greenpeace's actions.
38. Also on 22 September 2025, I understand that Mel Evans, Head of UK Climate for Greenpeace, issued a communication to RWE workers, reinforcing the points made in the 12:02 email from Ms Hamid and Mr McCallum.
39. At 09:25 on 23 September 2025, Ms Hamid wrote to Mr Glover requesting an urgent Zoom call. At 11:05, Mr Glover replied that it would not be appropriate for

RWE to engage further with Greenpeace in light of the ongoing police investigation, and he cancelled the Follow-Up Meeting until further notice.

40. At 11:49 on 24 September 2025, Ms Hamid wrote again to Mr Glover seeking to re-engage with RWE regarding Greenpeace's proposals. In that email, Ms Hamid referred to the Incident and stated that *"as an organisation, [Greenpeace] have always felt comfortable running 'inside-outside' strategies"*, adding that they *"can be on the roof of the Parliament and briefing MPs inside the Parliament the same week. It is who we are and we do not have any permanent friends or enemies"*.
41. At 09:03 on 25 September 2025, Mr Glover responded to propose that *"the best course of action is for Alice and RWE's wider team to follow up with Adam Bell to fully understand [Greenpeace's] proposal and hopefully for him to understand [RWE's] ideas and perspectives. This will hopefully allow a constructive dialogue on this topic between the relevant experts to continue."* As at the date of this Witness Statement, I am not aware of there being any further response or exchange.
42. The emails I refer to above in paragraphs 36,37, 39, 40 and 41 are exhibited in an email chain at [WHJ1/113-116], and the communication I refer to above in paragraph 38 is exhibited at [WHJ1/117].

Greenpeace press releases

43. On, and in and around, the date of the Incident, Greenpeace published a series of posts across social media and on its website, including an initial press release entitled *"Greenpeace activists scale power station's 75-metre chimney stacks to protest 'The Great Gas Rip-Off'"*. I exhibit these social media posts at [WHJ1/118-123], and the press release at [WHJ1/124-129].
44. Greenpeace also published a website statement entitled *"Greenpeace power station protest: what you need to know"*. This statement sets out Greenpeace's rationale for the Incident and associated demands, closely following the narrative in the Report. It includes a section *"what we're calling for"* and a section *"Greenpeace's approach to protest"*, which describes the action as *"a last resort"* and states: *"When you see a government or company being targeted by our activists, it's a sure sign that they're refusing to stop harming people and nature, despite coming under huge pressure to do so"*. I exhibit this website statement at exhibit [WHJ1/130-136].

45. I am aware of a section on Greenpeace's website titled "*Become a trained Greenpeace activist*" [WHJ1/xx]. Under "*Five things to know about being an activist*", point 5 states: "*Being an activist means taking calculated risks. Actions and protests are often illegal, so activists in some roles risk getting a criminal conviction*". I exhibit this website statement at [WHJ1/137-152].
46. Greenpeace advertised an in person event entitled "Northwest Regional Gathering: Gas Campaign Launch!", which took place on 27 September 2025, in Liverpool. The listing encourages volunteers to attend and that the event will "*be a great opportunity to get to know other Organisers from across the region, and to plan how to take action locally on the Gas campaign on your home turf.*" I exhibit this listing at [WHJ1/153-156].
47. In addition, Greenpeace has publicly advertised a further event scheduled to take place on 21 October 2025 entitled "*The Great Gas Rip-Off*", which states that Greenpeace will be "*postering streets to expose the truth*" and be "*working with communities hit hardest by soaring bills to shift the balance of power*" as well as "*building an army of digital activists to shift the narrative online*". I exhibit this listing at [WHJ1/157-160].

Historic trespass incidents

48. I understand from discussions with the Claimant's solicitors that on 26 October 2009, a protest trespass incident occurred at RWE's Didcot A power station, which at the time was an operational coal fired power station. The trespass was carried out by approximately 20 people who were protesting against the burning of fossil fuels and so intended to stop or disrupt the operation of Didcot A power station. On 27 October the High Court ordered an injunction to restrain the trespass and action associated with the trespass.
49. In December 2016 a group of protestors known as "Reclaim the Power" blockaded the access road to the Claimant's coal-fired power station at Aberthaw. I exhibit an article on Reclaim the Power's website about this blockading at [WHJ1/161-163].
50. Aberthaw was a coal-fired power plant located in Wales with a capacity of circa 1,560 MW. It was decommissioned in 2020.
51. In April 2008 a group of protestors known as "Rising Tide" entered the Aberthaw power station and chained themselves to coal conveyors in order to disrupt

production. I exhibit an article on Rising Tide's website about this protest at [WHJ1/164-165].

52. In April 2010, protestors associated with Rising Tide blockaded the rail track which supplied Aberthaw power station with coal.
53. In June 2015, protestors associated with "Reclaim the Power" trespassed and occupied the roof of RWE Npower's headquarters in Trigonos, near Swindon. I exhibit an article on Reclaim the Power's website about this at [WHJ1/166-172].
54. In 2019, persons associated with Greenpeace trespassed on RWE's headquarters in Essen, Germany, interrupting board meetings that were taking place. I exhibit this press release at [WHJ1/173-177].
55. In June 2021, activists associated with Extinction Rebellion blocked the access road to the Claimant's Didcot B Power Station. I exhibit an online news article about this at [WHJ1/178-186].

Risk of further trespass

56. Since early 2022 there has been a marked increase in protest activity by climate change and environmental groups, including Just Stop Oil ("JSO"), targeting petroleum and energy infrastructure across the United Kingdom.
57. I understand from speaking with the Claimant's solicitors that, on 21 March 2022, following public statements threatening disruption and police intelligence indicating imminent protest activity, companies within the Valero group ("Valero") obtained an interim injunction containing prohibitions designed to protect eight oil facilities that Valero owns and/or operates.
58. Between 1 and 15 April 2022, JSO and other protest groups carried out nationwide blockades of critical oil facilities. As part of this coordinated action, protesters targeted the Oil Storage Depot at Kingsbury, Warwickshire, by blocking access roads and climbing onto oil tankers. Numerous protesters were arrested. Valero's interim injunction was renewed, and on 28 July 2023 it was replaced by a further, similar interim injunction. The judgment of Mr Justice Ritchie in Valero Logistics UK Ltd v Persons Unknown [2024] EWHC 134 (KB) (the "**Valero Injunction**") describes the Kingsbury protest and the relief granted in detail. I exhibit a copy of this judgment at [WHJ1/187-224].

59. I understand that, following the Kingsbury protests, other major oil and energy companies obtained similar injunctions to prevent unlawful protest activity at their sites. From publicly available information and following a discussion with the Claimant's solicitors, I understand that the following orders were made (claim references in brackets):

Valero Energy Ltd	QB-2022-000904
Valero Logistics UK Ltd	
Valero Pembrokeshire Oil Terminal Ltd	
Esso Petroleum Company Ltd	QB-2022-001098
ExxonMobil Chemical Ltd	
Essar Oil (UK) Ltd	PT-2022-000326
Stanlow Terminals Ltd	
Infranorth Ltd	
Navigator Terminals Thames BV Ltd	QB-2022-01139
Navigator Terminals Seal Sands Ltd	
Navigator Terminals North Tees Ltd	
Navigator Terminals Windmill Ltd	
Exolum Pipeline Systems Ltd	QB-2022-001142
Shell International Petroleum Company Ltd	QB-2022-001259
Shell U.K. Ltd	QB-2022-001241
Shell U.K. Oil Products Ltd	QB-2022-001420

60. From discussions with the Claimant's solicitors, I understand that most of the above injunctions have been continued and have been effective in deterring further

unlawful protest activity. In particular, in the Valero proceedings the Court granted a long term order (described in the judgment as “quasi final”) with a duration of five years: please see paragraphs 75 and 79 on page 37 of the judgement (and page 223 of [WHJ1].

61. I have been informed by the solicitors acting for the Claimant that, on 25 July 2024, Drax Power Limited (“**Drax**”) obtained an interim injunction imposing prohibitions against “Reclaim the Power”, “Axe Drax”, and persons unknown connected with those groups, in relation to Drax’s biomass power station in Selby, North Yorkshire. I understand that Drax did not seek to continue that injunction after its first anniversary, but the order contained liberty to apply such that Drax may return to Court to seek further relief in materially the same terms if future protests are threatened.
62. In light of:
 - 62.1 The increased targeting of critical national infrastructure by protestors;
 - 62.2 The trespass by Greenpeace at the Staythorpe Power Plant despite discussions having been held and a further meeting diarised;
 - 62.3 the aims and statements set out on Greenpeace's website, including material that incites the commission of criminal offences, as highlighted above [WHJ1/137-152]; and
 - 62.4 the forthcoming event currently scheduled for 21 October 2025 referred to in paragraph 47 above [WHJ1/157-160],
63. I, and others within RWE, are very concerned that Greenpeace's new campaign will involve not only lawful and/or virtual protest, but also unlawful direct action, including further trespass, either at Staythorpe or any of the Large Power Stations.
64. Further, I am concerned that the publicity generated by the Staythorpe trespass incident and Greenpeace's new campaign will encourage other persons, not affiliated with Greenpeace, to target the Large Power Stations in a similarly unlawful way.

Risk of harm

65. The Claimant's staff and contractors devote significant time and expertise to ensuring that work at its power stations is undertaken safely and securely. Process safety and general safety are the Claimant's primary focus, and highly skilled, competent personnel are engaged to manage hazards so as to protect everyone working at the sites.
66. By trespassing at the Staythorpe Power Plant and climbing to the metal gantry, the protesters exposed themselves to multiple serious risks, including:
 - 66.1 Exposure to exhaust gases emitted from the stacks, which are at high temperature, high mass flow and high velocity, and contain elevated levels of carbon monoxide, carbon dioxide and oxides of nitrogen; these factors present a significant risk of serious injury or death.
 - 66.2 Inhalation of oxygen depleted gases, which could lead to asphyxiation or dizziness, increasing the risk of a fall from height.
 - 66.3 Contact with high surface temperatures at the stack while the plant was operating, creating a risk of significant thermal injury.
 - 66.4 Falls from the gantry, the steps or the stacks, with a potential for fatal injury from these heights; even a fall of a few metres onto the highest gantry could cause serious harm.
 - 66.5 Exposure to hazardous chemicals and areas of high voltage elsewhere on site; untrained persons unfamiliar with the power station's layout and systems could inadvertently endanger themselves, others and Claimant personnel.
67. A further concern was the trespassers' possession of climbing equipment. Had they attempted to climb to the top of the stacks and/or sought to lodge themselves within the stacks to impede generation, additional risks would have arisen, including:
 - 67.1 Becoming attached to or injured by equipment or structures at levels above the gantry that are not routinely accessed and would require specialist rescue, potentially following station shutdown, thereby exposing additional individuals (including emergency responders and site personnel) to hazards.
 - 67.2 The risk of gas inversion (i.e. the potential for exhaust gases to downdraft the outside of the stack). The Claimant does not permit work at high-access levels of

the gas turbine stacks unless the station is operating at high loads and in a steady state due to this risk; meteorological conditions can also materially increase the likelihood of inversion.

- 67.3 The need to restrict unit operations to reduce gas concentrations in the vicinity of the protesters to protect their safety. The Claimant does not permit its own staff or contractors to access the upper stack gantry without an appropriate safety document because of the risks of gas inversion.
- 67.4 The protesters' lack of training in the Claimant's alarm systems and site announcements. Any site alarm, whether related or unrelated to the trespass, would have created additional challenges for the onsite team in managing the protesters' safety, with a real risk that the protesters would not respond appropriately even if warned.

Existing security measures

- 68. The Claimant has implemented extensive security measures at its Large Power Stations. Each site is enclosed by a 2.8 metre high perimeter security fence (shown hashed black on the plans appended to the witness statement of Rachel Smith), which is either palisade or chain link fencing with anti-climb topping. The perimeter fence line and critical assets are monitored by CCTV and protected by security lighting, under the control of the Claimant's security team.
- 69. Detection systems are deployed around critical assets, automated access control systems are in operation, and manned guarding is maintained at key locations.

Enhanced security measures

- 70. In response to the threat of further trespass incidents, the Claimant has increased security across its power stations, including more frequent patrols, posting guards at main access points, reducing entry to the Large Power Stations to single lanes by creating chicaned entry (by closing the outer gate), increasing guarding across day and night shifts, strengthening liaison with local police forces and conducting full searches on entry.

Potential disruption in the event of further trespass

- 71. In order to detail the potential consequences for the stability of the National Grid in the event of a further trespass, it is necessary to provide a brief overview of (i)

RWE Supply & Trading GmbH and its relationship with the Claimant, (ii) the electricity system in Great Britain (iii) the electricity market and system operation and (iv) the importance of the Claimant's Power Stations to the National Grid.

RWE Supply & Trading

72. RWE Supply & Trading GmbH is a subsidiary within the RWE group of companies (RWE). It is the interface between the RWE group's generation portfolio (including the Claimant) and the energy markets, and is responsible for trading electricity, gas, commodities and CO2 emission allowances on behalf of the group.
73. RWE Supply & Trading's trading specialists in the UK collaborate closely with the operating units of the Claimant in relation to commercial optimisation and market interface.
74. The Claimant sells electricity from its GB power stations via intra group arrangements to RWE Supply & Trading, which then sells that electricity in wholesale markets and/or to the National Energy System Operator, as applicable. This explanation is based on my role and on information provided by colleagues within RWE Supply & Trading and the Claimant.

The GB electricity system

75. The electricity system in Great Britain (GB) comprises generation, transmission and distribution stages. In outline: (a) power stations generate electricity; (b) substations transform voltages for safe use; (c) transmission lines (on towers/pylons) transport power at high voltage across GB to grid supply points; and (d) distribution networks deliver electricity at lower voltages to end consumers.
76. The GB electricity transmission system (the System) operates synchronously at a target frequency of 50 hertz (Hz). Electricity can be transported across the System so that supply can meet demand in different locations at any given time.
77. Maintaining system frequency close to 50 Hz requires continuous, real time balancing of supply and demand. This is a highly dynamic process requiring constant, second-by-second monitoring and prompt adjustment.

The GB electricity market and system operation

78. In summary: (a) generators (including the Claimant) decide how much to produce, taking account of market prices, physical constraints and instructions from the system operator; (b) electricity is traded bilaterally and on exchanges across different timeframes (forward/hedging, day ahead, intra day); and (c) residual imbalances are managed in real time.
79. The National Energy System Operator ("**NESO**"), formerly the Electricity System Operator within National Grid, is responsible for real time operation and balancing of the GB transmission system. NESO forecasts demand, assesses available generation and issues instructions to generators and other providers to balance the System and maintain frequency.
80. To do this, NESO procures and utilises a range of balancing and ancillary services (including frequency response and reserve services) and takes actions in the Balancing Mechanism. Providers must be able to respond rapidly to instructions, sometimes within seconds, to address sudden changes in demand or supply.
81. The precise volumes of reserve and response that NESO secures vary by season, time of day and system conditions. The purpose of those services is to ensure that sudden losses of generation or changes in demand can be managed so that frequency remains within statutory limits around 50 Hz.

The Claimant's GB Power Stations

82. Each Large Power Station uses natural gas as its primary fuel. I have already set out the key features of each station in paragraphs 13 to 20 above, and I exhibit a document which shows the figures for the gross/generated capacity for each station at [WHJ1/225]. These figures are also set out in the table in paragraph 7 above, and for the Small Power Stations in the table in paragraph 9 above.
83. In aggregate, the Power Stations provide several gigawatts (GW) of installed capacity to the GB System.
84. The availability of the Power Stations to generate when instructed contributes materially to the secure and efficient operation of the GB System, particularly at times of system stress or during peak demand.

Potential disruption to the GB System from future protests

85. The GB System is a wide synchronous electricity generation system. The physics of the design of such a system mean it can only be operated effectively in an extremely finely-balanced way. To give a practical example, each time someone switches on a light in a home, the system's frequency will respond and a power station will respond by adjusting its output to restore the frequency back to 50 hertz. When the light is switched off, a power station will adjust again to maintain the balance. It therefore takes very little to disturb the system and create an imbalance. If the frequency even fluctuates 0.2 hertz above or below 50 hertz, this must be reported, and if it fluctuates 0.5 hertz above or below 50 hertz, the system is unstable and the UK Government will get involved.
86. To deal with this fine-balancing, NESO have the reserves I mention above. I exhibit a document which shows the procured megawattage of electricity NESO held for each of its reserves as at 7am on 22 September 2025 at [WHJ1/226-227].
87. The Power Stations form part of the UK's critical national infrastructure. They are material CCGT assets on the GB System.
88. If protestors trespassed onto any of the Large Power Stations, the Claimant would obviously have to take measures to try to ensure the safety of those protestors and its employees and engineers. These measures could result in the Claimant having to shut down its electrical generating systems and take them off-line, which would result in the Claimant being forced to reduce, or stop, output. In such a scenario, the Claimant would obviously try to take its systems off-line in a phased and controlled way. Doing this would avoid a sudden and unpredictable loss in electricity generation.
89. However:
 - (a) It is entirely foreseeable that the Claimant might have to do a complete shut-down of its equipment very quickly. If it was forced to do this at one or more of the Large Power Stations then – by virtue of these stations' critical importance to the GB System – it would result in a significant loss of supply of electricity. This could require NESO to take balancing actions, including calling on reserve and response services, instructing alternative generators, and/or managing demand.

Staythorpe Power Station has an installed gross/generated capacity of approximately 1,787 MW per day. If it was forced to stop output,

then based on the figures set out in [WHJ1/226-227], there would be a loss of supply to the GB System greater than the amount NESO will have procured in its fast-acting frequency response. This would result in NESO having to rebalance the GB System by removing demand, resulting in consumers being left without power.

- (b) In the most critical scenario, the loss of output could be greater than the reserves available to NESO. If this happened, frequency would fall, and automatic low frequency demand disconnection schemes would need to be triggered to arrest the fall in frequency, resulting in customers being disconnected and left without electricity for a period.
- (c) Even if the Claimant was able to do a controlled, phased shut down of its on-site equipment, the consequences I mention above in paragraph 89.(b) could still also occur due to circumstances outside of the Claimant's control. Because the GB System is a nationwide grid dependent on multiple generators to produce electricity, if (say) there was not much wind on a particular day, or an offshore generator tripped, these factors – along with the even controlled shut down of a Large Power Station – could combine to cause the same result.
- (d) To extend the point in paragraph 89 (c) above, this could also happen if there was coordinated and simultaneous protester action taken at multiple Large Power Stations.

90. Overall, the GB System is designed to have the Claimant's six Large Power Stations in operation producing the gross capacity of electricity to supply to the grid. If one or more of those Large Power Stations was forced to reduce or stop generating electricity, whether or not in controlled, phased way, it has the potential to significantly disrupt the Grid.

91. Some examples of such disruption, from publicly available reports, are as follows:

91.1 On 27 May 2008, there was a near simultaneous loss of generation at Longannet Power Station (Fife) and Sizewell B Power Station (Suffolk). The event exceeded available reserves, and automatic low frequency relays operated to arrest the frequency fall (to approximately 48.8 Hz). Approximately 546 MW of demand was automatically disconnected, affecting around 500,000–550,000 customers for 20–

63 minutes. I exhibit at [WHJ1/228-264] the National Grid report on this incident, with the impacts summarised at page 3 of the report (or page 230 of [WHJ1]).

- 91.2 On 9 August 2019, a lightning strike caused a fault on the transmission network. A number of embedded generators disconnected, and there were near simultaneous issues at Hornsea Offshore Wind Farm and Little Barford Power Station. Frequency fell to about 48.8 Hz and automatic low frequency demand disconnection operated. I exhibit at [WHJ1/265-301] the technical report commissioned by Ofgem, which records at page 5 (or page 268 of [WHJ1]) that approximately 1.1 million customers were without power, rail services were disrupted (including at Farringdon and King's Cross) and other critical facilities (including Ipswich Hospital and Newcastle Airport) were affected.
92. The purpose of these examples is to illustrate, by reference to official reports, that sudden and material losses of generation can result in automatic demand disconnection and widespread disruption if they exceed available balancing headroom. It is therefore important, from a system security perspective, that major power stations (such as the Large Power Stations) are able to operate without unlawful interference.

Financial impact of future protests on the Claimant

93. Based on my role and discussions with colleagues in operations and trading, I understand the following:
94. If protestors were to gain access to certain operational areas, the Claimant may be required to reduce output or shut down units for safety reasons. Any damage to on-site infrastructure could prevent the station(s) from generating until repairs are completed.
95. The Claimant's output is sold via RWE Supply & Trading under intra group arrangements. RWE Supply & Trading sells power forward and in short term markets to match expected generation. If generation is reduced or lost unexpectedly, RWE Supply & Trading may need to buy power back at prevailing market prices or settle imbalances at imbalance prices. In periods of system stress, these prices can be significantly higher than normal wholesale prices. This results in direct financial loss to the group.

96. Depending on timing and duration, an unplanned loss of generation can also affect the group's ability to deliver contracted ancillary services and may give rise to charges or non-delivery consequences under applicable market rules and contracts.
97. The Claimant would also incur direct costs responding to any incident (including site security and safety measures) and repairing any damage (for example, to perimeter fencing or to any structures used as climbing points). The costs of repairing damage to operational plant and associated downtime could be significant.

Need for an injunction

98. I am concerned that, notwithstanding the enhanced measures described in paragraph 70 above, that without an injunction in place, these existing measures will not adequately protect against the risk of future protests, the associated risks described above, and the potential consequences for the stability of the National Grid detailed in paragraphs 85 – 92 of this statement, for the following reasons:
 - 98.1 Power stations are an obvious target for protesters in light of past incidents, the recent trespass at Staythorpe, and Greenpeace's latest campaign and associated activities described in paragraphs 43 – 47 of this statement.
 - 98.2 All of the Claimant's power stations have extensive perimeter fence lines (between approximately 1 km and 3 km) that cannot be constantly monitored end to end. Their remote locations provide opportunities for protesters to establish lying up areas outside the perimeter and to stage equipment to defeat fencing, whether by climbing over or cutting through. Perimeter fencing is designed to delay a trespasser; the types of fencing currently used by the Claimant can offer only limited resistance to a determined intruder. Recent protester tactics include bypassing anti climb toppings by placing materials such as carpets over them to facilitate climbing.
 - 98.3 No prior notice was given before the recent trespass at Staythorpe Power Plant, despite the fact that the Claimant had held The Meeting (referred to in paragraph 34 and that the Follow-Up Meeting (paragraph 35) had been diarised. Further, the recent correspondence received from Greenpeace (referred to in paragraph 40 leads me to believe that no advance notice will be given for any future protest. The

absence of notice prevents the Claimant from making specific preparations and risks significant disruption.

- 98.4 The grant of an injunction would provide an effective deterrent to activists who might otherwise contemplate direct action, given that, from what I understand from having discussed this matter with the Claimant's solicitors, such injunctions obtained in respect of similar sites appear to have been effective in deterring trespass and nuisance at those sites,
- 98.5 It would appear that existing legislation, including section 7 of the Public Order Act 2023, was not sufficient to deter the protesters from trespassing at Staythorpe Power Plant and the other sites that constitute key national infrastructure under that legislation, since coming into force on 2 July 2023.
- 98.6 Damages would not be an adequate remedy if the conduct sought to be restrained were to occur, because:
 - (1) There are substantial health and safety risks to the Claimant's staff, the emergency services and the protesters themselves.
 - (2) There is potential disruption to the supply of power to the National Grid.
 - (3) The First Defendant comprise a class of unknown individuals; even if individual protesters could be identified, I have seen no evidence and have no reason to believe they could satisfy any substantial award of damages.
99. In seeking the injunction the Claimant does not seek to stifle debate concerning the cost of utilities or related issues.
100. The injunction, if granted, would not prevent lawful protest activity outside the perimeter of any of the Claimant's power stations.
101. The Claimant seeks to ensure that there are no health and safety issues arising from trespass at its sites and that its operations are not disrupted by unlawful behaviour, given the potential wider implications for the stability of the National Grid.

Persons Unknown

102. I am informed and believe that the Claimant does not know, and cannot reasonably ascertain, the identities of any individuals who intend to engage in unlawful direct action at the Large Power Stations.
103. While the Claimant does not know the identities of those likely to be directly involved in the activities which the injunction seeks to restrain. Of the 12 people arrested following the trespass at the Staythorpe Power Plant, I am only aware that one of them has been named in a Greenpeace article. I am not aware of the names of any of the other trespassers arrested. Following discussions with the Claimant's solicitors, it was concluded that it is not necessary to seek to identify those individuals and add them as named defendants to this claim, as the conditions attached to their bail (detailed in paragraph 23 above) renders them as very unlikely to breach the terms of the injunction being sought.

Without Notice

104. I believe it is necessary to make this application without prior notice to the Second Defendant and Persons Unknown (by the methods proposed below). I recognise that this is an exceptional step, but there are compelling reasons:
- 104.1 As set out in the paragraph 40 of this witness statement, I believe that there is a real risk that if the Second Defendant or Persons Unknown were notified in the usual way, any of the Large Power Stations could be deliberately targeted and direct action undertaken before any injunction could be obtained, thereby defeating the purpose of the relief sought. Greenpeace have made it clear that they are willing to take direct action despite the fact that the Claimant is on-going dialogue with them in respect of their concerns. In particular, the Greenpeace have reminded the Claimant that they adopt "*inside/outside*" strategies involving direct action whilst discussions are ongoing [WHJ1/113-116].
- 104.2 The prospect of direct action is of serious concern for the reasons already detailed in this witness statement: significant health and safety risks around the Large Power Stations, potential disruption to the stability of the National Grid, and financial loss. If notice of this claim were to accelerate or precipitate direct action, it would generate the very harms the Claimant seeks to prevent.

Full and Frank Disclosures

105. As this is a without-notice application, I am aware of the Claimant's duty of full and frank disclosure. I confirm that the Claimant has been advised by its solicitors of the need to disclose all facts and matters which, after reasonable enquiry, it knows or could with reasonable diligence ascertain and which might affect the Court's decision whether to grant the order or the terms upon which any order should be made.

Service

106. Other than the Second Defendant, there is presently no other identified defendant on whom service can be effected. Of the 12 people arrested following the trespass at the Staythorpe Power Plant, I am only aware that one of them has been named in a Greenpeace article. I am not aware of the names of any of the other trespassers arrested.
107. I understand from discussing this matter with the Claimant's solicitors that, following the Supreme Court's decision in *Wolverhampton City Council v London Gypsies & Travellers* [2024] 2 WLR 45, that the methods of service referred to in paragraph 108 below have been used on similar injunctions recently. The Claimant therefore seeks an order dispensing with service of the Claim Form, the application for an injunction and any order made on the First Defendant (Persons Unknown) and to enable service by email on the Second Defendant.
108. The Claimant proposes to take the following steps in respect of the Claim Form, the application notice and any order:
- 108.1 Uploading copies of all court documents to a dedicated webpage at <https://uk.rwe.com/injunction>;
- 108.2 Affixing prominent warning notices at each of the locations marked with small blue squares" on Plans 1B to Plan 6B (inclusive), which I exhibit at [WHJ1/302-307], predominantly on the perimeter fence and, where necessary, on stakes placed in the ground, stating:
- (1) that proceedings have been issued;
 - (2) that an injunction is in force covering each relevant Large Power Station;
 - (3) that the court documents may be viewed online (with the URL), and that copies can be obtained from the Claimant's solicitors (with contact details);

108.3 Sending emails to:

- (1) getactive.uk@greenpeace.org (the email address related to the Great Gas Rip Off campaign on the Greenpeace website; and
- (2) press.uk@greenpeace.org (the press enquiry addresses published on the Greenpeace website)
- (3) info.uk@greenpeace.org (the email address as published on Greenpeace's social media).

108.4 A draft of the proposed warning notice will be provided for the Court's approval at the hearing.

109. I believe these are reasonable and effective steps to bring the proceedings, the application notice and any order to the attention of the Second Defendant and Persons Unknown.

110. I understand that the purpose of this witness statement is to set out matters of fact of which I have personal knowledge. I understand that it is not my function to argue the case, either generally or on particular points, or to take the court through the documents in the case.

CROSS-UNDERTAKING IN DAMAGES

111. Although I cannot foresee any way in which anyone affected by the injunction could suffer loss or damage, I am authorised on behalf of the Claimant to provide the necessary cross-undertaking to pay any sum which the Court considers appropriate to compensate anyone affected by the proposed injunction if it is subsequently determined that the Claimant is not entitled to the order which they seek.

112. The audited accounts for the Claimant for year ending 31 December 2024 which I exhibit at [WHJ1/308-377] show a Gross Profit of £401 million and a Turnover of £1,587 million.

CONFIRMATION OF COMPLIANCE

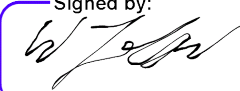
This witness statement sets out only my personal knowledge and recollection, in my own words. On points that I understand to be important in the case, I have stated honestly (a) how well I recall matters and (b) whether my memory has been refreshed by considering documents, if so how and when. I have not been asked or encouraged by anyone to include in this statement anything that is not my own account, to the best of my ability and recollection, of events I witnessed or matters of which I have personal knowledge.

Signed by: 
Signed:48E74C720702431...

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.

Dated:1st October 2025.....
Signed:
Full name: William Henry Jeffery.....

Signed by: 
48E74C720702431...

CERTIFICATE OF COMPLIANCE

1. I am the relevant legal representative within the meaning of Practice Direction 57AC.
2. I am satisfied that the purpose and proper content of trial witness statements, and proper practice in relation to their preparation, including the witness confirmation

required by paragraph 4.1 of Practice Direction 57AC, have been discussed with and explained to William Henry Jeffery.

3. I believe this trial witness statement complies with Practice Direction 57AC and paragraphs 18.1 and 18.2 of Practice Direction 32, and that it has been prepared in accordance with the Statement of Best Practice contained in the Appendix to Practice Direction 57AC.

Signed by:


Signed:F9706FE3BB4F463..

DONAL PATRICK KELLY

Name:

Legal Director

Position:

30 September 2025

Date:

On behalf of: Claimant
Witness: Donal Patrick Kelly
No. of witness statement: 1
Exhibit(s): DPK1
Date made: 20 October 2025

Claim No. PT-2025-001017

IN THE HIGH COURT OF JUSTICE

CHANCERY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE Generation UK PLC

Claimant

And

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION
ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR
WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM,
FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY
GREENPEACE CAMPAIGN OR OTHERWISE**

(2) Greenpeace UK Limited

Defendants

FIRST WITNESS STATEMENT OF DONAL PATRICK KELLY

I, Donal Patrick Kelly of Osborne Clarke LLP, of One London Wall, London EC2Y 5EB,
state as follows:

1. I am a solicitor of the Senior Courts of England and Wales and, subject to supervision, I have the care and conduct of this matter on behalf of the Claimant.
2. I make this statement on behalf of the Claimant. I am duly authorised to do so.

3. Unless stated to the contrary, the facts set out in this statement are within my own knowledge and from information provided to me by others. Where facts are within my knowledge, I confirm that they are true. Where the facts were supplied by others, or are derived from documents, this is indicated and I confirm that they are true to the best of my knowledge, information and belief.
4. A list of documents is set out at the beginning of a paginated bundle of documents marked Exhibit "**DPK1**". This list identifies the documents to which I refer or which have been referred to me for the purposes of providing evidence in this witness statement. The documents themselves are true copies of the documents to which I shall refer in this witness statement. References in this witness statement to page numbers in Exhibit "**DPK1**" are in the format "**[DPK1/page(s)]**".
5. I make this statement following the hearing before the Honourable Mr Justice Rajah on 3 October 2025 (the "**Hearing**"), at which, following the Claimant's application of 1 October 2025 (the "**Application**"), the Claimant was awarded an interim injunction (the "**Interim Injunction**") on the terms set out in the order of Mr Justice Rajah dated 3 October 2025 **[DPK1/1-15]** and sealed on 6 October 2025 (the "**Order**") and concerning the Sites as referred to at paragraphs 1(i) to 1(vi) of the Order. The Order provided that the Application would be listed for a return date on 24 October 2025 (the "**Return Date Hearing**"), having been made *ex parte* without notice to the Defendants.
6. In advance of the Return Date Hearing, I wish to update the Court on relevant matters that have occurred since the Order was made.

NOTIFICATION TO THE DEFENDANTS

7. Pursuant to paragraphs 6 and 7 of the Order:
 - 7.1 The Application documents and the Order were uploaded to <https://uk.rwe.com/injunction> on 7 October 2025 (the "**Website**"). I exhibit at **[DPK1/16]** a screenshot of the documents listed on the Website.
 - 7.2 On 7 October 2025, I was advised by Adriana Gasparini of the Claimant that the Order and the warning notices set out in the Order (together, the "**Notices**") had been displayed at prominent locations at each of the Sites, as at 16:30 on that date.

- 7.3 I understand that the location of each of the Notices is in line with Plans 1B to 6B (inclusive), as referred to at paragraph 108.2 of the First Statement of William Henry Jeffery and re-enclosed at **[DPK1/18-23]**.
8. Pursuant to paragraph 14 of the Order, an email was sent to the Second Defendant timed at 15:04 on 7 October 2025, serving the Claim Form, Particulars of Claim, the Application, and the Order (the "**Email**").
- 8.1 As part of the Email, a link was provided to the exhibits to the Claimant's witness evidence that were filed as part of the Application, due to the size of the documents.
- 8.2 As the above link was due to expire 7 days after the Email had been issued, a further Large File Send was arranged by the Claimant's solicitors' IT department, timed at 16:56 on 14 October 2025. A copy of this email, together with the Email, is enclosed at **[DPK1/24-25]**.
9. A further email was sent to the Second Defendant timed at 16:01 on 7 October 2025, serving a copy of the Claimant's note of the Hearing. I enclose a copy of this email at **[DPK1/26]**.
10. A further email was sent to the Second Defendant timed at 20:44 on 7 October 2025, serving a copy of the Claimant's skeleton argument, which was filed with the Court ahead of the Hearing. I enclose a copy of this email at **[DPK1/27]**.

CORRESPONDENCE WITH THE SECOND DEFENDANT

11. By an email sent at 14:57 on Wednesday 15 October 2025 by a Mr Jack Robirosa to "donal.kelly@osbourneclarke.com" and "injunctions@osbourneclarke.com" (although also received at that time by my correct email address and injunctions@osborneclarke.com, the email address identified at Schedule 3 to the Order), a letter dated 15 October 2025 from Mr Robirosa on behalf of the Second Defendant and Greenpeace Limited was received in response to the Application. In this letter, Mr Robirosa disputed that the Second Defendant was the correct entity to have been named in the proceedings, but suggested that Greenpeace Limited would have been the correct entity. I enclose a copy of this letter at **[DPK1/28-29]**. Paragraph 8 of the letter states that Mr Robirosa is legal counsel at "Greenpeace UK".
12. By an email sent at 13:05 on Thursday 16 October 2025 by injunctions@osborneclarke.com to Mr Robirosa, a letter dated 16 October 2025

was sent in reply to Mr Robirosa's letter. I enclose a copy of this letter at [DPK1/30-33].

13. By an email sent at 18:59 on Thursday 16 October 2025 by Mr Robirosa to injunctions@osborneclarke.com, a letter dated 16 October 2025 was sent in reply. I enclose a copy of this letter at [DPK1/34-36].
14. By an email sent at 16:36 on Friday 17 October 2025 by injunctions@osborneclarke.com, a letter dated 17 October 2025 was sent in reply to Mr Robirosa's letter of 16 October 2025. I enclose a copy of this letter at [DPK1/37-39].
15. By an email sent at 10:22 on Monday 20 October 2025 by Mr Robirosa to injunctions@osborneclarke.com, Mr Robirosa confirmed that he was taking instructions but that it may be the following day until a further response would be provided. I enclose a copy of this email at [DPK1/40].
16. Accordingly, at the time and date of this witness statement, the Claimant and Second Defendant are yet to reach a final agreement in respect of the matters set out in the correspondence I have referred to in paragraphs 11 – 14 above, as well as whether Greenpeace Limited ought to be added to the proceedings. However, it is anticipated that these discussions will continue once the response referred to in paragraph 15 above is received, in the hope that these matters can be finalised before the Return Date Hearing.

NOTIFICATION TO THE OWNERS PURSUANT TO PARAGRAPH 17 OF THE ORDER

17. Pursuant to paragraph 17 of the Order, the owners of the areas of land hatched blue on Plans 1A, 2A, 4A and 6A at Annexure 2 to the Particulars of Claim were notified of the claim, the Application and the Order via process server at their registered office addresses, as set out below.

Owner	Location	Date and/or Time of service
Eastern Power Networks PLC	Newington House, 237 Southwark Bridge Road, London SE1 6NP	14:30 on 7 October 2025

National Grid Electricity Transmission PLC	1-3 Strand, London WC2H 5EH	14:10 on 7 October 2025
National Gas Transmission PLC	National Grid House, Warwick Technology Park, Gallows Hill, Warwick CV34 6DA	14:45 on 7 October 2025

18. I enclose copies of the letters that were served on the respective owners at **[DPK1/41-46]**.
19. I also enclose the corresponding statements of process server at **[DPK1/47-52]**, noting that there is one statement in respect of service on both Eastern Power Networks PLC and National Grid Electricity Transmission PLC, given their geographical proximity to each other; with a separate statement in respect of the service that was effected on National Gas Transmission PLC.
20. On 9 October 2025, legal counsel for National Grid Electricity Transmission PLC responded to an email from Rachel Smith (senior solicitor for the Claimant), acknowledging receipt of the letter referred to at paragraph 18. I enclose a copy of this email at **[DPK1/53-55]**. As at the time and date of this witness statement, no further response has been received from National Grid Electricity Transmission PLC. Following discussions with the Claimant, I understand that no responses have been received from either Eastern Power Networks PLC or National Gas Transmission PLC.

FURTHER ACTIVITY

21. In the interests of full and frank disclosure, I confirm that the Claimant has not encountered further protest activity at any of the Sites similar to the Incident since the Interim Injunction was granted.
22. I refer to paragraphs 19 to 22 of the First Witness Statement of Rachel Jane Smith dated 1 October 2025, in which Ms Smith referred to the Didcot Sale Land, defined as an area of non-operational land that was subject to a prospective sale. I understand from Ms Smith that the sale of the Didcot Sale Land completed on 17 October 2025.

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.

Dated: 20 October 2025



Signed:

Full name: Donal Patrick Kelly

On behalf of: Claimant
Witness: Donal Patrick Kelly
No. of witness statement: 3
Exhibit(s): DPK3
Date made: 6 October 2026

Claim No. PT-2025-001017

IN THE HIGH COURT OF JUSTICE

BUSINESS AND PROPERTY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE Generation UK PLC

Claimant

And

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION
ENTER OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR
WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM,
FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY
GREENPEACE CAMPAIGN OR OTHERWISE**

(2) Greenpeace UK Limited

(3) Greenpeace Limited

Defendants

THIRD WITNESS STATEMENT OF DONAL PATRICK KELLY

I, Donal Patrick Kelly of Osborne Clarke LLP, of One London Wall, London EC2Y 5EB,
state as follows:

1. I am a solicitor of the Senior Courts of England and Wales and, subject to supervision, I have the care and conduct of this matter on behalf of the Claimant.

2. I make this statement on behalf of the Claimant. I am duly authorised to do so.
3. Unless stated to the contrary, the facts set out in this statement are within my own knowledge and from information provided to me by others. Where facts are within my knowledge, I confirm that they are true. Where the facts were supplied by others, or are derived from documents, this is indicated and I confirm that they are true to the best of my knowledge, information and belief.
4. A list of documents is set out at the beginning of a paginated bundle of documents marked Exhibit "**DPK3**". This list identifies the documents to which I refer or which have been referred to me for the purposes of providing evidence in this witness statement. The documents themselves are true copies of the documents to which I shall refer in this witness statement. References in this witness statement to page numbers in Exhibit "**DPK3**" are in the format "[**DPK3**/page(s)]".
5. This is my third witness statement in these proceedings. I make it in support of the Claimant's position at the first annual review hearing of the Order, listed to be heard in the three-day window of 19 to 21 October 2026 (the "**Review Hearing**").
6. I do not seek to repeat the matters set out in my first or second witness statements or the first witness statements of Rachel Jane Smith and William Henry Jeffery which were filed in support of the Claim or the second witness statement of William Henry Jeffery in support of the Claimant's position at the Review Hearing. I refer to and adopt the contents of those statements as part of the evidence before the Court. All five statements are available at <https://uk.rwe.com/injunction>.
7. Unless otherwise defined in this witness statement, capitalised terms used adopt the meaning ascribed to them in my second witness statement.

THE McGOLDRICK UNDERTAKING

8. In my second witness statement, I described the background concerning Mr Vincent McGoldrick's involvement in this matter. By way of brief summary:
 - 8.1 Mr McGoldrick was one of the individuals involved in the trespass at the Claimant's Staythorpe Power Station on 22 September 2025 (the "**Incident**"). He was the only individual involved in the Incident whose identity was known to the Claimant.

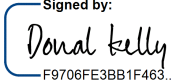
- 8.2 Mr McGoldrick was not joined as a named Defendant to the Claim at the time the Order was made, as the bail conditions to which he was then subject were considered sufficient to restrain his conduct in relation to the Sites.
- 8.3 On 5 September 2026, the Claimant was informed that the Crown Prosecution Service had decided not to proceed with a prosecution in relation to the Incident. As a consequence, any bail conditions to which Mr McGoldrick had been subject fell away.
- 8.4 Following the lapse of those bail conditions, the Claimant wrote to Mr McGoldrick by letters dated 26 September 2026 and 28 September 2026, offering him the opportunity to regularise his position by entering into a contractual undertaking to the Claimant in materially the same form as the undertakings given by the Second and Third Defendants in 2025. Mr McGoldrick was informed that, if he did not provide such an undertaking, the Claimant intended to apply to join him as a named Defendant to the Claim.
- 8.5 As at the date of my second witness statement, no acknowledgement or response from Mr McGoldrick had been received.
9. Following the filing of my second witness statement, Mr McGoldrick made contact with the Claimant's solicitors. By email dated 2 October 2026, Mr McGoldrick confirmed that he was minded to agree to the undertaking. By a further email dated 5 October 2026, Mr McGoldrick confirmed that, subject to a request that the undertaking automatically falls away if the injunction comes to an end or is discharged for any reason, he would be happy to sign the undertaking. I exhibit copies of those emails at [DPK3/1-5].
10. On 5 October 2026 at 14:06, Osborne Clarke emailed Mr McGoldrick, providing an updated draft Undertaking reflecting his requested amendment. On 5 October 2026 at 16:45 Mr McGoldrick emailed Osborne Clarke with a copy of a signed and dated contractual undertaking to the Claimant (the "**McGoldrick Undertaking**"). I exhibit a copy of the signed McGoldrick Undertaking at [DPK3/6-9].
11. By the McGoldrick Undertaking, Mr McGoldrick has given a binding contractual commitment to the Claimant that he will not enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the Sites.

12. In light of Mr McGoldrick having entered into the McGoldrick Undertaking, the Claimant does not intend to make an application to join Mr McGoldrick as a named Defendant to the Claim.

STATEMENT OF TRUTH

13. 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.

Dated: 6 October 2026

Signed:  Signed by:
F9706FE3BB1F463...
Full name: Donal Patrick Kelly

On behalf of: Claimant
Witness: Donal Patrick Kelly
No. of witness statement: 3
Exhibit(s): DPK3
Date made: 6 October 2026

Claim No. PT-2025-001017

IN THE HIGH COURT OF JUSTICE

BUSINESS AND PROPERTY DIVISION

PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE Generation UK PLC

Claimant

And

**(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER
OR REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR
WHO DAMAGE OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF
THEM, FOR THE PURPOSES OF PROTEST WHETHER IN SUPPORT OF ANY
GREENPEACE CAMPAIGN OR OTHERWISE**

(2) Greenpeace UK Limited

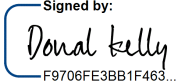
(3) Greenpeace Limited

Defendants

EXHIBIT DPK3 TO THE THIRD WITNESS STATEMENT OF DONAL PATRICK KELLY

This is the exhibit marked "**DPK3**" referred to in the Third Witness Statement of Donal Patrick Kelly dated 6 October 2026.

Dated: 6 October 2026

Signed: 
F9706FE3BB1F463...
Donal Patrick Kelly

No.	Document	Page(s)
1.	Emails with Mr Vincent McGoldrick dated 2 October 2026 and 5 October 2026 confirming willingness to agree and sign an undertaking	1-5
2.	The McGoldrick Undertaking	6-9

Khushal Thobhani

From: Vincent McGoldrick <vinmcg@icloud.com>
Sent: 02 October 2026 12:12
To: injunctions@osbourneclarke.com
Subject: Claim No: PT-2025-001017

** EXTERNAL EMAIL **

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pL

Your reference DKA/10002880/0170574179.1/TCU

Dear Osborne Clarke,

I have received your request to sign a Statement of Acknowledgment on behalf of your client RWE. Just to let you know I am minded to agree to this undertaking and expect to sign the document by the 7th of October. I will perhaps have to add some comments to the document but need the weekend to think about this.

I have one question. Could you explain how you found my details. Name and address. I look forward to hearing from you on this.

Yours faithfully

Vincent McGoldrick

Khushal Thobhani

From: Injunctions
Sent: 02 October 2026 15:09
To: 'Vincent McGoldrick'
Subject: RE: Claim No: PT-2025-001017 [OC-OC_UK.FID8569336]

Dear Mr McGoldrick,

Please see the attached correspondence.

Yours faithfully

Osborne Clarke LLP

osborneclarke.com

.....
E injunctions@osborneclarke.com
T + 44 20 7105 7000
One London Wall, London EC2Y 5EB
.....

-----Original Message-----

From: Vincent McGoldrick <vinmcg@icloud.com>
Sent: 02 October 2026 12:12
To: injunctions@osbourneclarke.com
Subject: Claim No: PT-2025-001017

** EXTERNAL EMAIL **

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pL

Your reference DKA/10002880/0170574179.1/TCU

Dear Osborne Clarke,

I have received your request to sign a Statement of Acknowledgment on behalf of your client RWE. Just to let you know I am minded to agree to this undertaking and expect to sign the document by the 7th of October. I will perhaps have to add some comments to the document but need the weekend to think about this.

I have one question. Could you explain how you found my details. Name and address. I look forward to hearing from you on this.

Yours faithfully



By email only: **vinmcg@icloud.com**

Vincent McGoldrick
38 Peacocks Close
Sudbury
Suffolk
CO10 8DA

Our reference DKA/10002880/O170574179.1/TCU

2 October 2026

Dear Mr McGoldrick,

Claim No: **PT-2025-001017**

RWE Generation UK Plc v (1) Persons Unknown who without the claimants permission enter or remain upon the premises described in the claim form, or who damage or deface any of those premises or any part of them, for the purposes of protest whether in support of any Greenpeace campaign or otherwise, (2) Greenpeace UK Limited and (3) Greenpeace Limited

We write further to your email dated 2 October 2026 and timed at 13:31.

Thank you for confirming that you intend to enter into the Undertaking. Please provide any comments that you may have as soon as possible, as we will need to take our client's instructions in respect of same.

As per our letter of 26 September 2026, our client will be required to make an application to add you as a Defendant to the claim unless the Undertaking is provided by **7 October 2026**.

With regards to your query, we were able to find a contact address for you as follows:

- (a) Your name appeared in an online article in which you were quoted as one of the protestors involved in the trespass incident at our client's Staythorpe power station in September 2025 (<https://www.greenpeace.org.uk/news/greenpeace-activists-scale-power-stations-75-metre-chimney-stacks-to-protest-the-great-gas-rip-off/>)
- (b) Posts in an online Greenpeace forum placed your location somewhere in Suffolk; https://greenwire.greenpeace.org.uk/s/group/0F9R50000001uTBKAY/greenpeace-west-suffolk?language=en_GB;

Osborne Clarke LLP

One London Wall, London, EC2Y 5EB T +44 207 105 7000 F +44 207 105 7005

Osborne Clarke LLP is a limited liability partnership registered in England and Wales with registered number OC397443 whose registered office is at One London Wall, London EC2Y 5EB. It is authorised and regulated in the UK by the Solicitors Regulation Authority (SRA) and is registered as a recognised body with SRA number 619990.

The term 'partner' refers to a member of Osborne Clarke LLP. A list of members of Osborne Clarke LLP and their professional qualifications is available for inspection at the registered office. Any advice given by any individual member, employee, or consultant is the responsibility of Osborne Clarke LLP and not the individual. Osborne Clarke LLP does not accept service by fax.

Osborne Clarke LLP is part of an international legal practice.

osborneclarke.com

- (c) We instructed an enquiry agent to locate an address for you in the Suffolk area, noting your age (also in the Greenpeace article); and
- (d) The search result provided your address, which was then verified by checking the Land Registry, which confirmed you as joint owner of the freehold interest in your property at 38 Peacocks Close.

We await hearing from you as soon as possible in respect of the Undertaking.

Yours faithfully

Osborne Clarke LLP

Osborne Clarke LLP

T +44 207 105 7000

E injunctions@osborneclarke.com

Khushal Thobhani

From: Injunctions
Sent: 05 October 2026 14:06
To: 'Vincent McGoldrick'; Injunctions
Subject: RE: Claim No: PT-2025-001017 [OC-OC_UK.FID8569336]
Attachments: Undertaking - Vincent McGoldrick(170672521.6).pdf; [Compare]-Undertaking - Vincent McGoldrick-170672521-v3 and Undertaking - Vincent McGoldrick-170672521-v5(170845158.2).docx

Dear Mr McGoldrick,

Further to your email below, please see the attached updated Undertaking, amended in accordance with your email below.

We also attach a compare document, highlighting the amendments from the version previously sent to you.

Please arrange for the attached Undertaking to be signed and returned to us as soon as possible.

Yours faithfully

Osborne Clarke LLP
osborneclarke.com

.....
E injunctions@osborneclarke.com
T + 44 20 7105 7000
One London Wall, London EC2Y 5EB
.....

From: Vincent McGoldrick <vinmcg@icloud.com>
Sent: 05 October 2026 11:08
To: Injunctions <injunctions@osborneclarke.com>
Subject: Re: Claim No: PT-2025-001017 [OC-OC_UK.FID8569336]

Dear Osborne Clarke,

Thank you for your response. Paragraph 2 of the undertaking refers to its duration. Can I request that the undertaking automatically falls away if the injunction comes to an end or is discharged for any reason. Subject to that amendment I would be happy to sign the undertaking.

Yours faithfully,

Vincent McGoldrick

On 2 Oct 2026, at 15:09, Injunctions <injunctions@osborneclarke.com> wrote:

Dear Mr McGoldrick,

Please see the attached correspondence.

Yours faithfully

Khushal Thobhani

From: Injunctions
Sent: 06 October 2026 09:50
To: 'vinmcg@icloud.com'
Subject: RE: Claim No: PT-2025-001017 [OC-OC_UK.FID8569336]

Dear Mr McGoldrick,

Thank you for your email and providing the photographs of the undertaking.

Please arrange for the original to be sent by special delivery to the following address:

FAO. Property Litigation Team
Osborne Clarke LLP
One London Wall
London
EC2Y 5EB.

Yours faithfully

Osborne Clarke LLP
osborneclarke.com

.....
E injunctions@osborneclarke.com
T + 44 20 7105 7000
One London Wall, London EC2Y 5EB
.....

From: Vincent McGoldrick <vinmcg@icloud.com>
Sent: 05 October 2026 16:45
To: Injunctions <injunctions@osborneclarke.com>
Subject: Claim No: PT-2025-001017 [OC-OC_UK.FID8569336]

**** EXTERNAL EMAIL ****

Dear Osborne Clarke,

Please find attached the signed copy of the amended and updated undertaking. I hope this is in order.

Yours faithfully,

Vincent McGoldrick

Claim No: PT-2025-001017

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PROPERTY, TRUST AND PROBATE LIST

BETWEEN:

RWE GENERATION UK PLC
(Company registration number 3892782)

Claimant

and

(1) PERSONS UNKNOWN WHO WITHOUT THE CLAIMANT'S PERMISSION ENTER OR
REMAIN UPON THE PREMISES DESCRIBED IN THE CLAIM FORM, OR WHO DAMAGE
OR DEFACE ANY OF THOSE PREMISES OR ANY PART OF THEM, FOR THE PURPOSES
OF PROTEST WHETHER IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR
OTHERWISE.

(2) GREENPEACE UK LIMITED
(Company registration number 02463348)

(3) GREENPEACE LIMITED
(Company registration number 01314381)

Defendants

RECITALS

- A. On 22 September 2025, Mr Vincent McGoldrick, together with other individuals, gained entry to the Claimant's Staythorpe Power Plant, the address of which is detailed below, in connection with a protest relating to a Greenpeace campaign.
- B. On 3 October 2025, the court made an order on an ex parte basis restraining the First and Second Defendants from entering, occupying or remaining on, or damaging or defacing any part (including the perimeter fence) of the land and premises as set out in paragraph 1 of that order (the "Interim Order").
- C. The Interim Order was sealed by the court on 6 October 2025.
- D. At the return date hearing on 24 October 2025, the Interim Order was continued against the First Defendant (the Second and Third Defendants having given undertakings to the Court) by order of the Honourable Mr Justice Trower (the "Order").

- E. Mr Vincent McGoldrick, without admission of liability, is willing to give a contractual undertaking to the Claimant on substantially the same terms as the injunction set out at paragraphs 1 and 2 of the Order.
- F. On the basis of that undertaking being given and the terms set out below, the Claimant is willing to refrain from applying to add Mr Vincent McGoldrick as a named defendant to the Claim and a person named as being subject to the Order whilst the undertaking remains extant.
- G. The first annual review of the Order is listed to be heard on a date to be confirmed between 19 and 21 October 2026 (the "Review Hearing").

Contractual Undertaking to the Claimant

1. Mr Vincent McGoldrick undertakes to the Claimant that he will not:
- i. enter, occupy or remain on, or damage or deface any part (including the perimeter fence) of the land and premises shown edged red on Plans 1 to 6 to the Order, being:
 - a) Staythorpe Power Station, Staythorpe, Newark, NG23 5RQ, as shown edged red on Plan 1;
 - b) Didcot Power Station, Didcot, Oxfordshire, OX11 7YU, as shown edged red on Plan 2;
 - c) Pembroke Power Station, Pembroke, West Pennar, Dyfed, SA71 5SS, as shown edged red on Plan 3;
 - d) Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6YT, as shown edged red on Plan 4;
 - e) Great Yarmouth Power Station, South Denes Road, Great Yarmouth, NR30 3PY, as shown edged red on Plan 5; and
 - f) Kings Lynn Power Station, Kings Lynn, PE34 3RD, as shown edged red on Plan 6; and
 - ii. in respect of anything prohibited by paragraph i above, (a) do it himself in any other way or (b) do it by means of another person acting on his behalf, or acting on his instructions.

Duration, Liberty to Apply and Variations

2. The undertaking shall take effect immediately and shall continue until the earlier of:
- i. the date of the hearing of the second annual review of the Order (if the Order is continued at the Review Hearing); or
 - ii. until released by written agreement of the Claimant; or
 - iii. the date on which the injunction against the First Defendant comes to an end or is otherwise discharged
3. The Claimant shall notify Mr Vincent McGoldrick of the date (or latest date) of any such hearing promptly upon being informed of such date by the Court.
4. Subject to Mr Vincent McGoldrick having complied with this undertaking, the Claimant shall not apply to join Mr Vincent McGoldrick as a named Co-Defendant to the Claim whilst the undertaking remains extant.

Sent from my iPhone

Service

5. This undertaking shall be served on the Claimant's solicitors, Osborne Clarke LLP, at One London Wall, London, EC2Y 5EB or by email to injunctions@osborneclarke.com.

Statement of Acknowledgment by Mr Vincent McGoldrick

Mr Vincent McGoldrick acknowledges that this undertaking constitutes a binding contractual obligation owed to the Claimant. Mr Vincent McGoldrick understands that if he breaches this undertaking, the Claimant may seek all remedies available at law or in equity, including but not limited to damages and injunctive relief. Mr Vincent McGoldrick confirms that he has been advised that he should seek legal advice. Mr Vincent McGoldrick confirms that he understands the meaning and effect of this undertaking.

Signed:

Name: _____

Mr Vincent McGoldrick

Date: _____

OR

Signed _____

Solicitors for Mr Vincent McGoldrick

Name: _____

Address

Reference:

Email

Telephone

Date: _____