

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

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.robirosa@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 Robirosa 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.robirosa@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

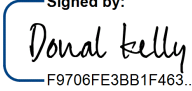
38. On 5 September 2026, the Claimant's solicitors were informed by Nottinghamshire Police (Detective Sergeant Millie Gillett of Mansfield CID) that the Crown Prosecution Service had decided not to proceed with a prosecution in relation to the trespass at the Claimant's Staythorpe Power Station on 22 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:
F9706FE3BB1F463...

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
F9706FE3BB1F463...

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

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:



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

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:



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**

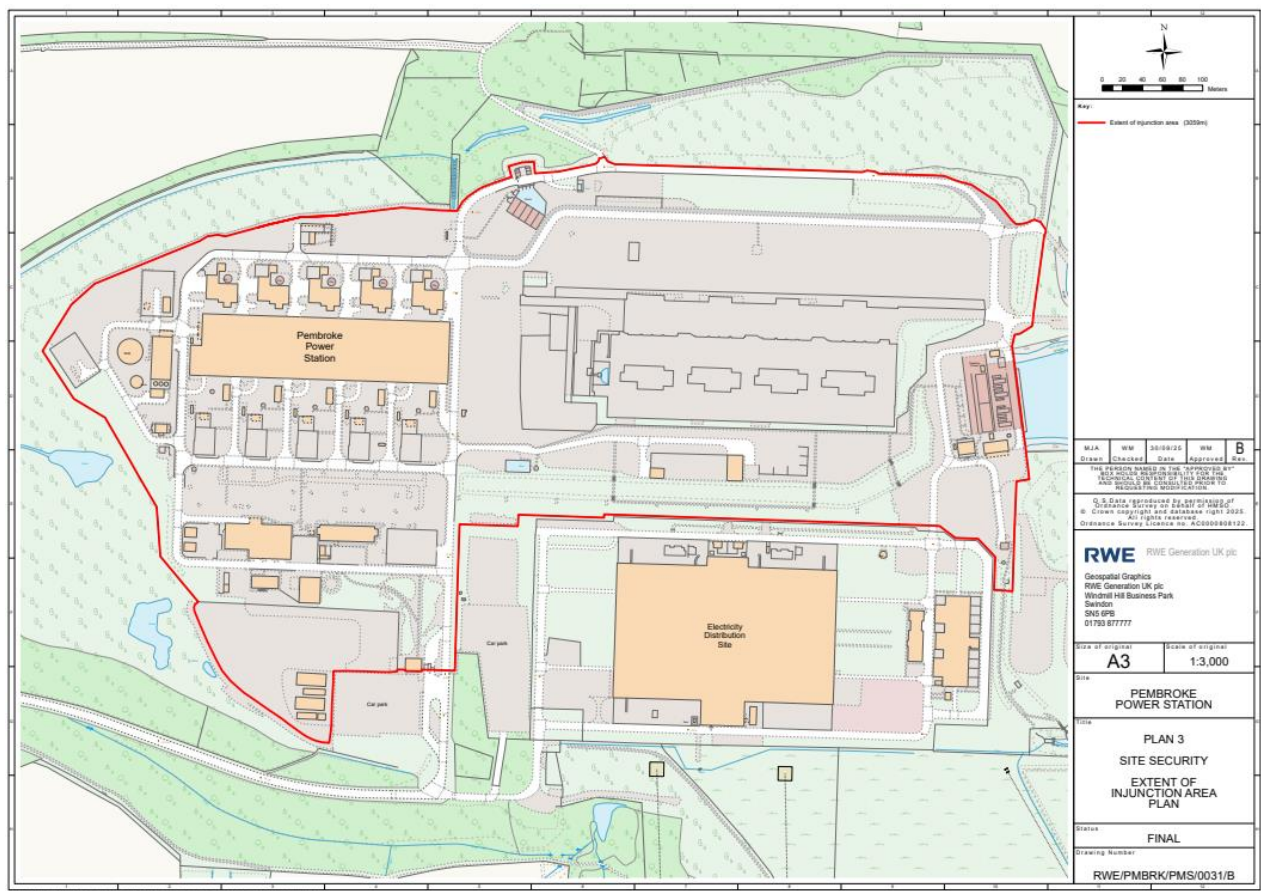
A copy of the Order and the legal proceedings to which it relates can be viewed at <https://uk.rwe.com/injunction> or obtained by e-mailing: injunctions@osborneclarke.com

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

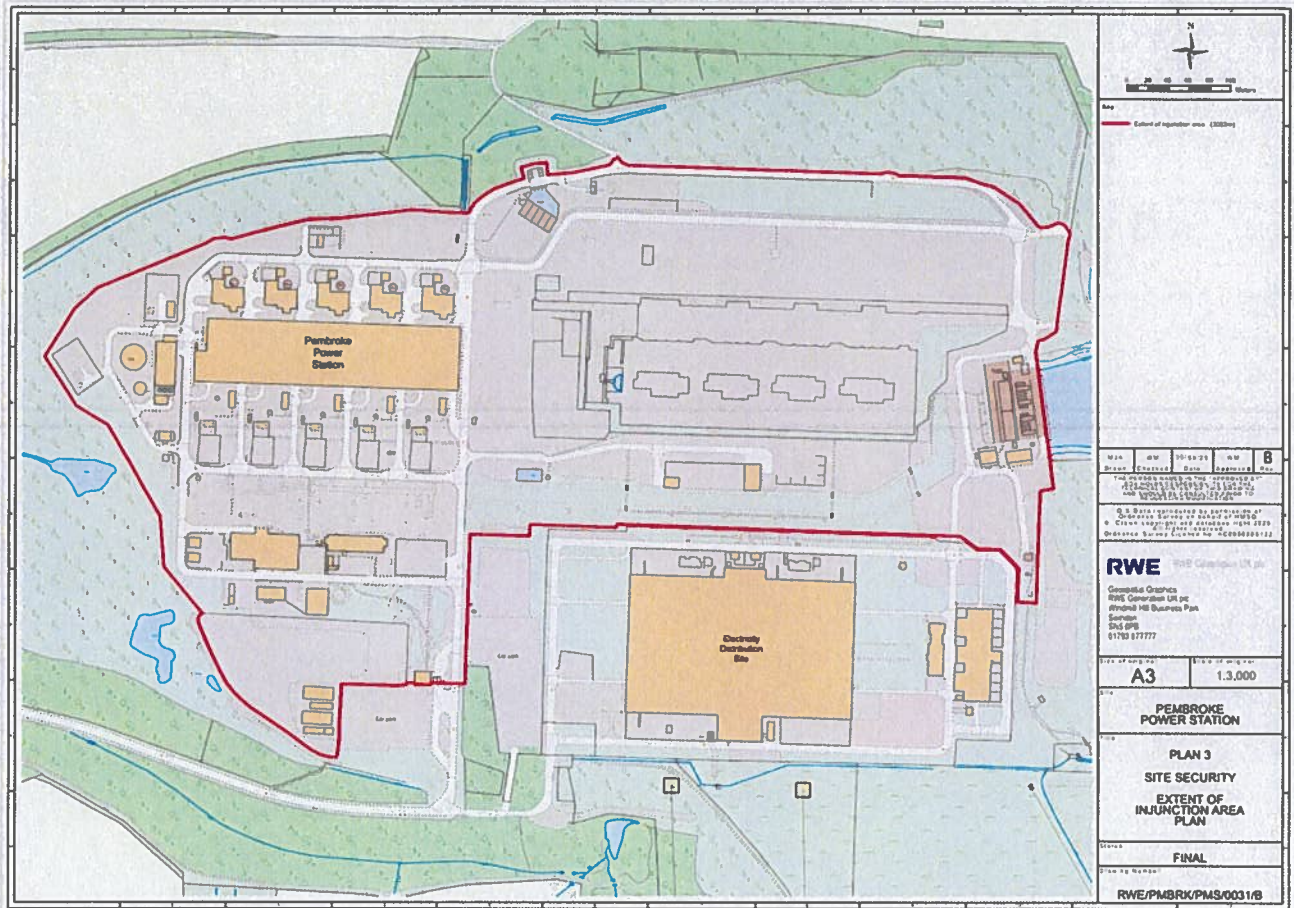
Chancery Division, The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL by
the Court's e-filing service at <https://efile.cefile-app.com>

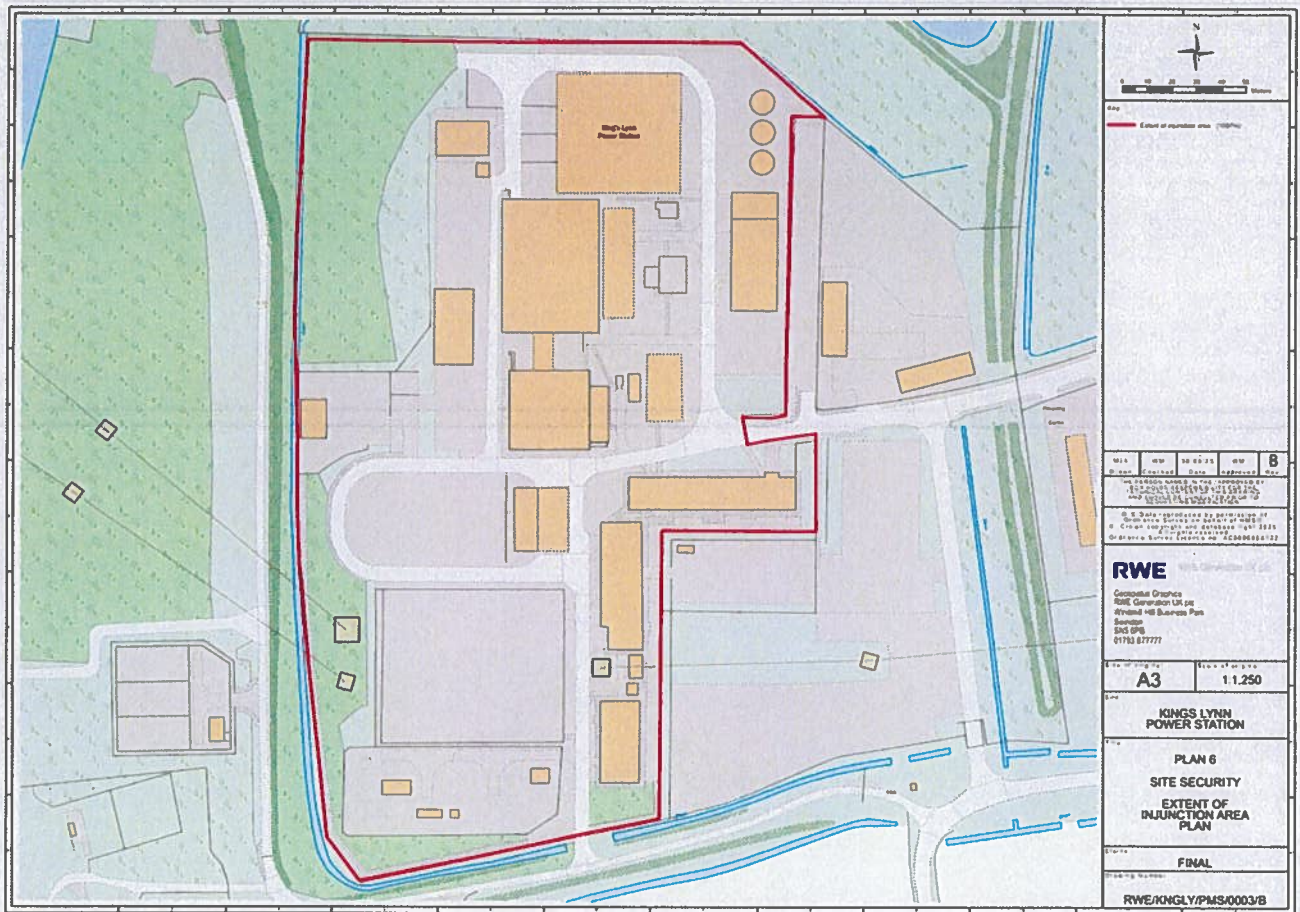
Dated: 24 October 2025

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.

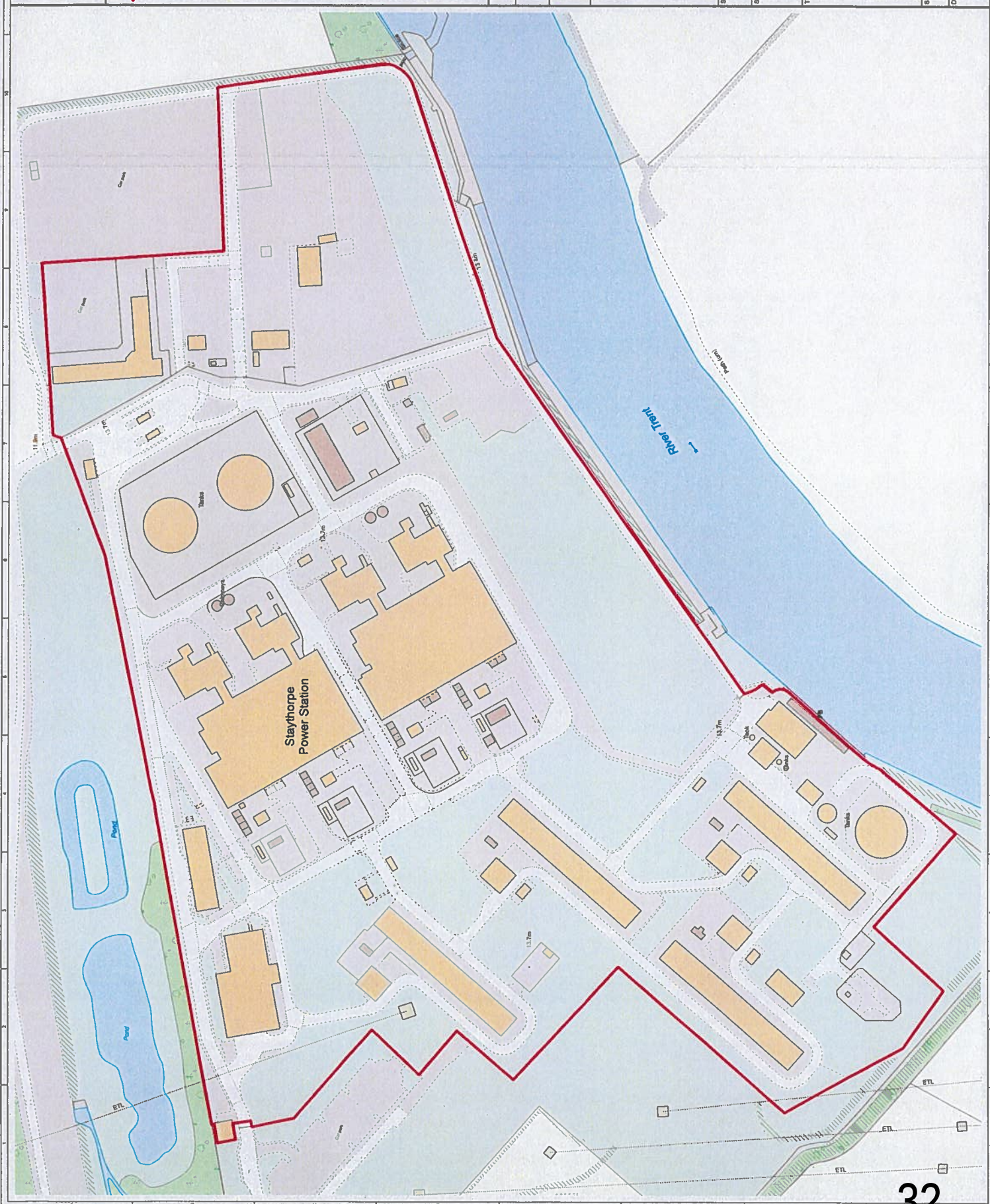
Dated: 24 Oct 2025

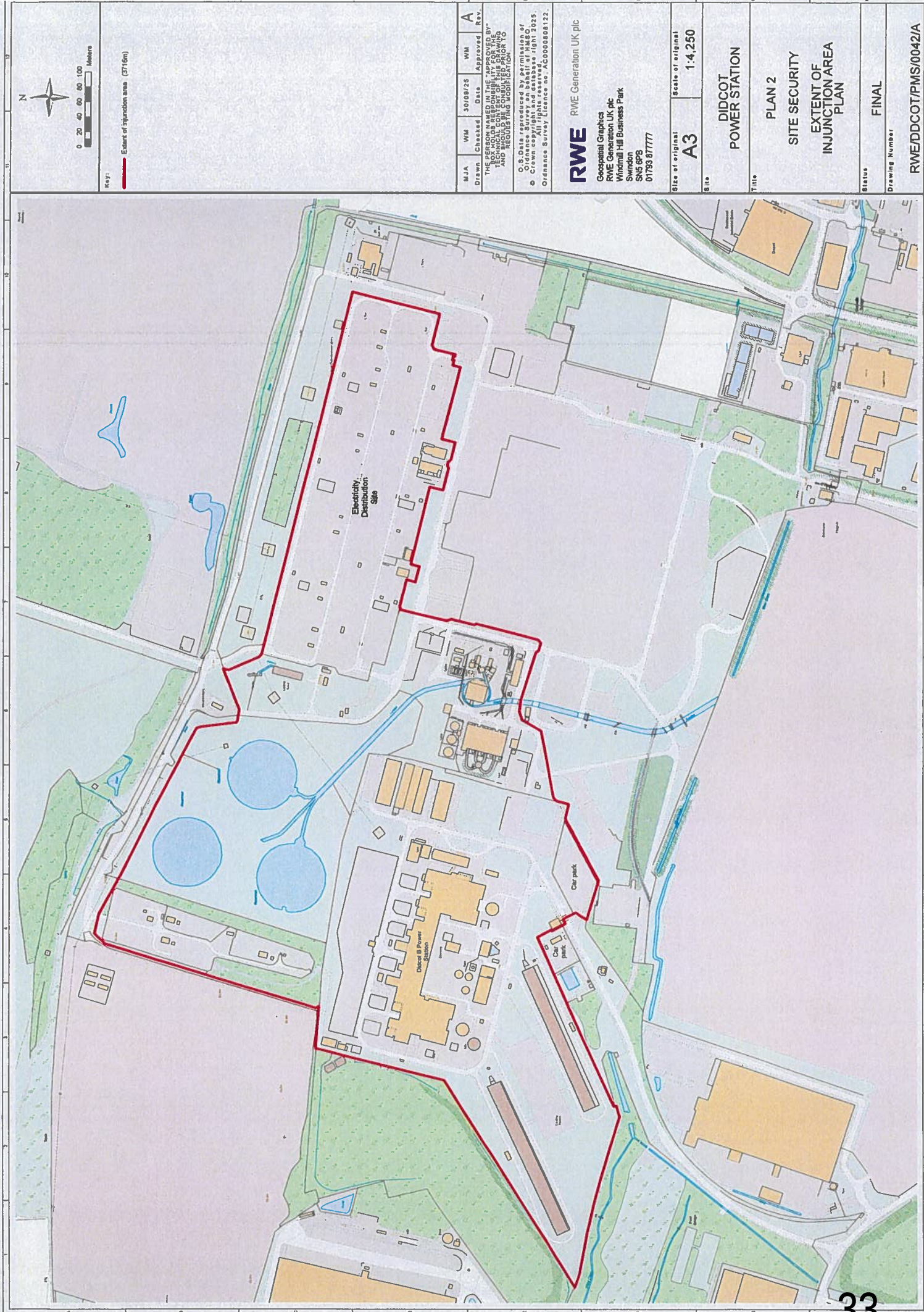
Judge: [Signature]

SCHEDULE 1: PLANS 1-6

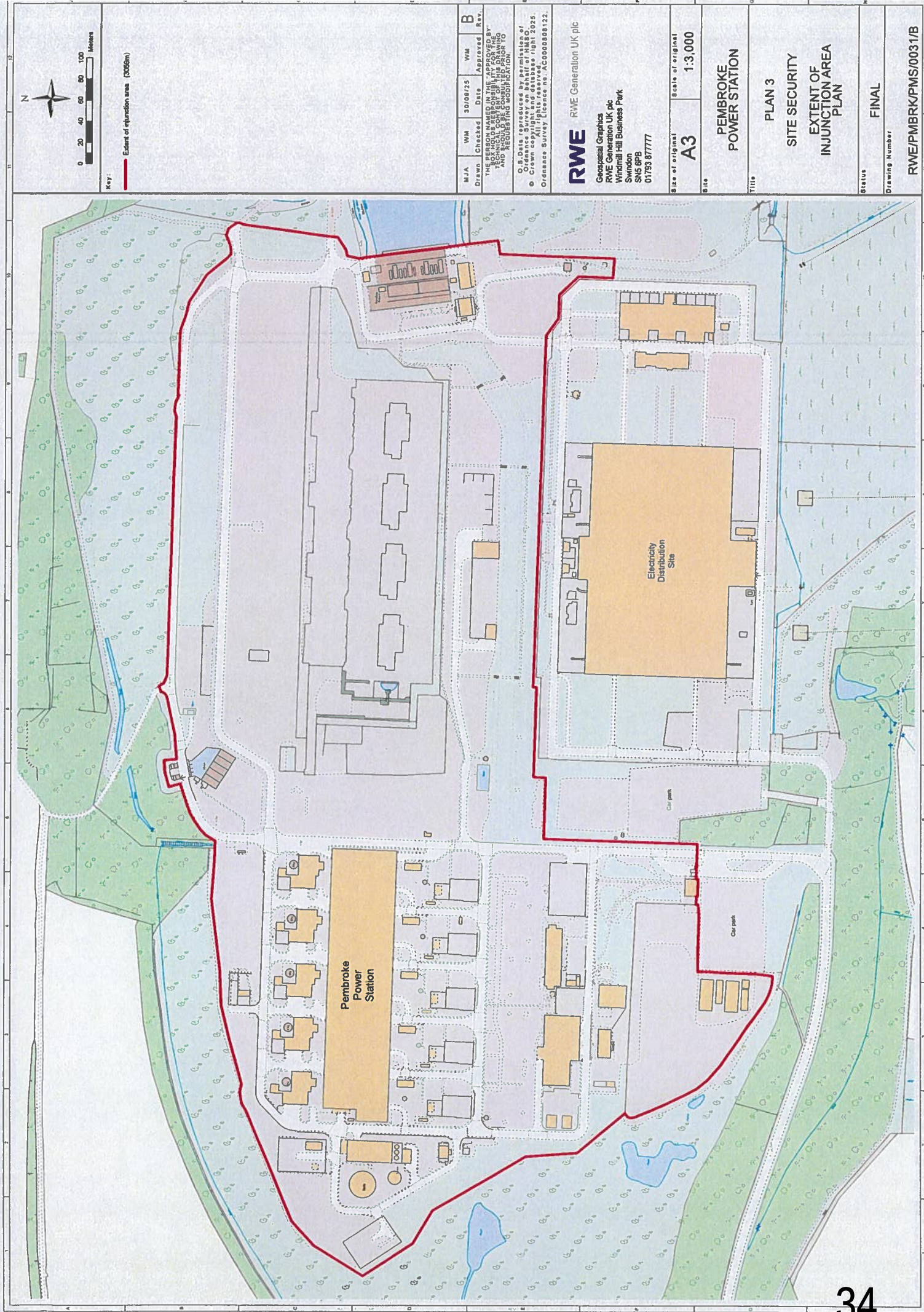


MJA	WM	30/08/25	WM	B
Drawn	Checked	Date	Approved	Rev.
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RWE Geospatial Graphics RWE Generation UK plc Windmill Hill Business Park Swindon SN6 6PB 01753 877777 RWE Generation UK plc Scale of original 1:2,250				
STAYTHORPE POWER STATION PLAN 1 SITE SECURITY EXTENT OF INJUNCTION AREA PLAN				
Issue Drawing Number FINAL RWE/STYTH/PM/0005/B				





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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/DDCOT/PMS/0042/A		



Key:

Extent of injunction area (300m)

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				30/08/25		B
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RWE RWE Generation UK plc

Geospatial Graphics
RWE Generation UK plc
Windmill Hill Business Park
Stratford
SN5 8PB
01793 617777

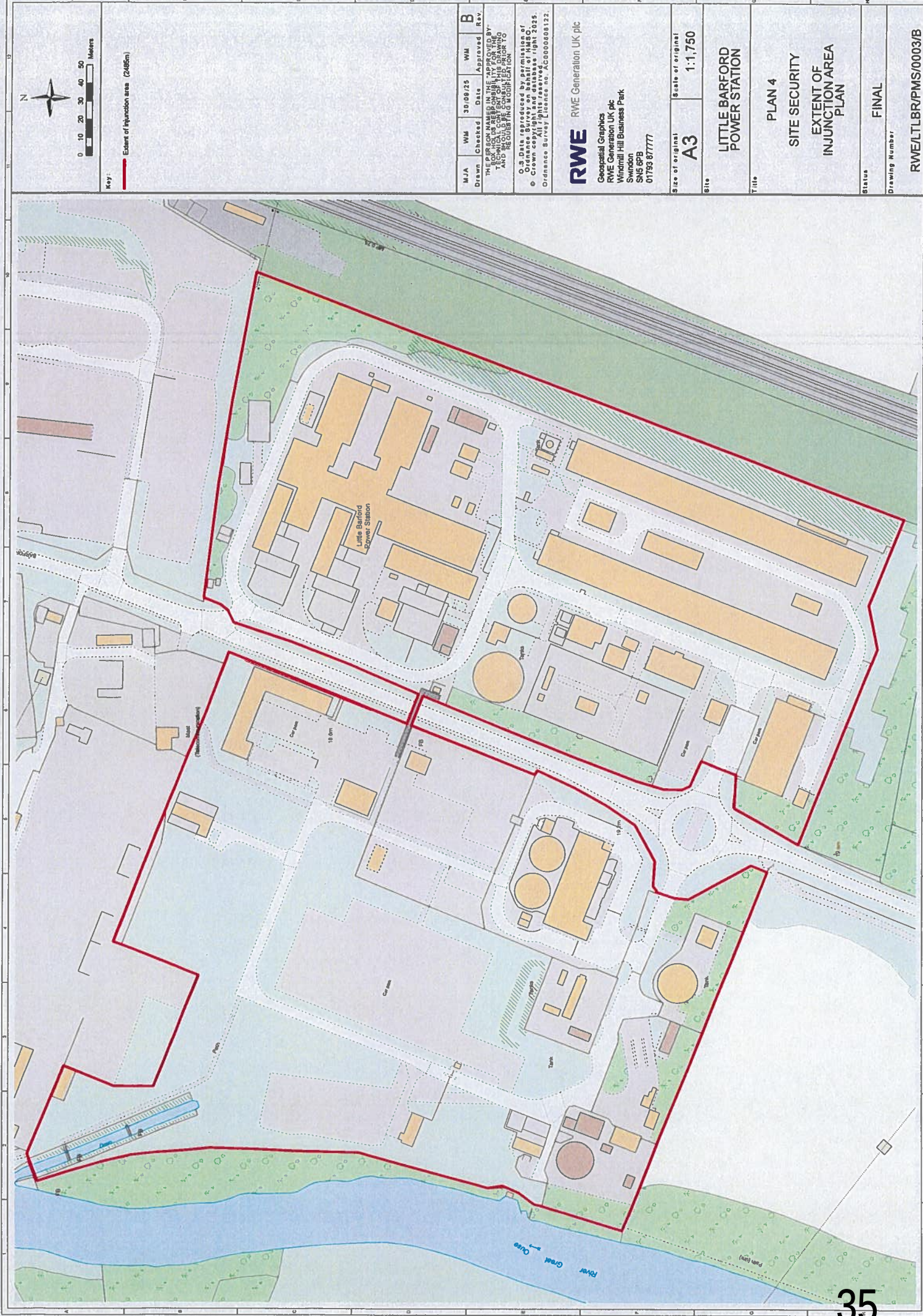
Size of original	A3
Scale of original	1:3,000

**PEMBROKE
POWER STATION**

**PLAN 3
SITE SECURITY
EXTENT OF
INJUNCTION AREA
PLAN**

Status
Drawing Number
FINAL

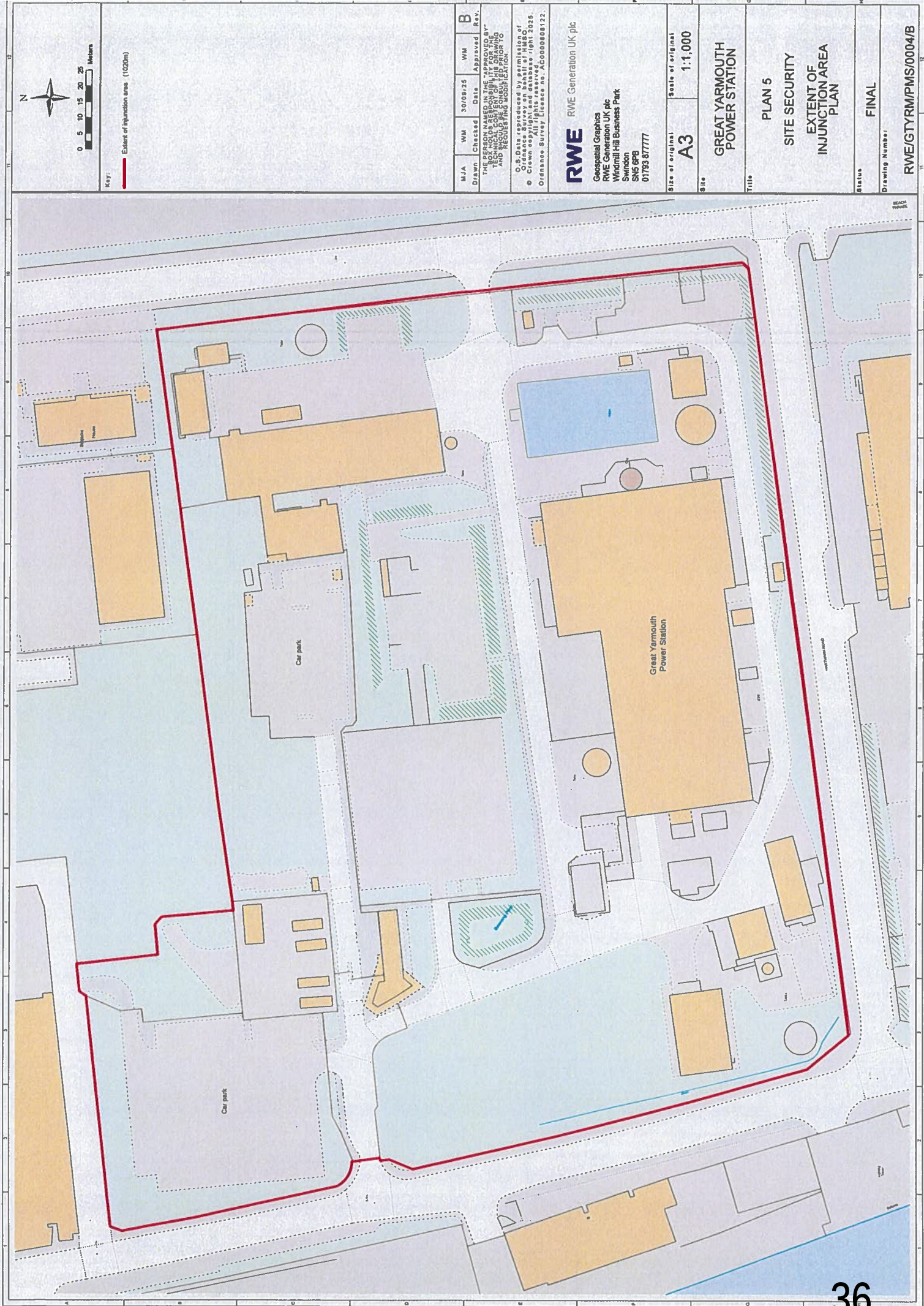
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0 10 20 30 40 50 Meters

Key: Extent of injunction area (2485m)

Drawn	MJA	WM	30/08/25	Date	Approved	WM	Rev	B
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Size of original	A3		Scale of original		1:1,750			
Site	LITTLE BARFORD POWER STATION							
Title	PLAN 4 SITE SECURITY EXTENT OF INJUNCTION AREA PLAN							
Status	FINAL							
Drawing Number	RWE/LTLBR/PMS/0003/B							



Key:

Extent of injunction area (100m)

M/A	Drawn	Checked	WM	30/08/25	Date	Approved	Rev.	B

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

Size of original	Scale of original
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Site
GREAT YARMOUTH POWER STATION

Title
**PLAN 5
SITE SECURITY
EXTENT OF
INJUNCTION AREA
PLAN**

Status
FINAL

Drawing Number:
RWE/GTYRM/PMS/0004/B



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Drawn	Checked	Date	Approved	Rev
		30/08/25		3

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RWE Generation UK plc
Windmill Hill Business Park
Swindon
SN5 8PB
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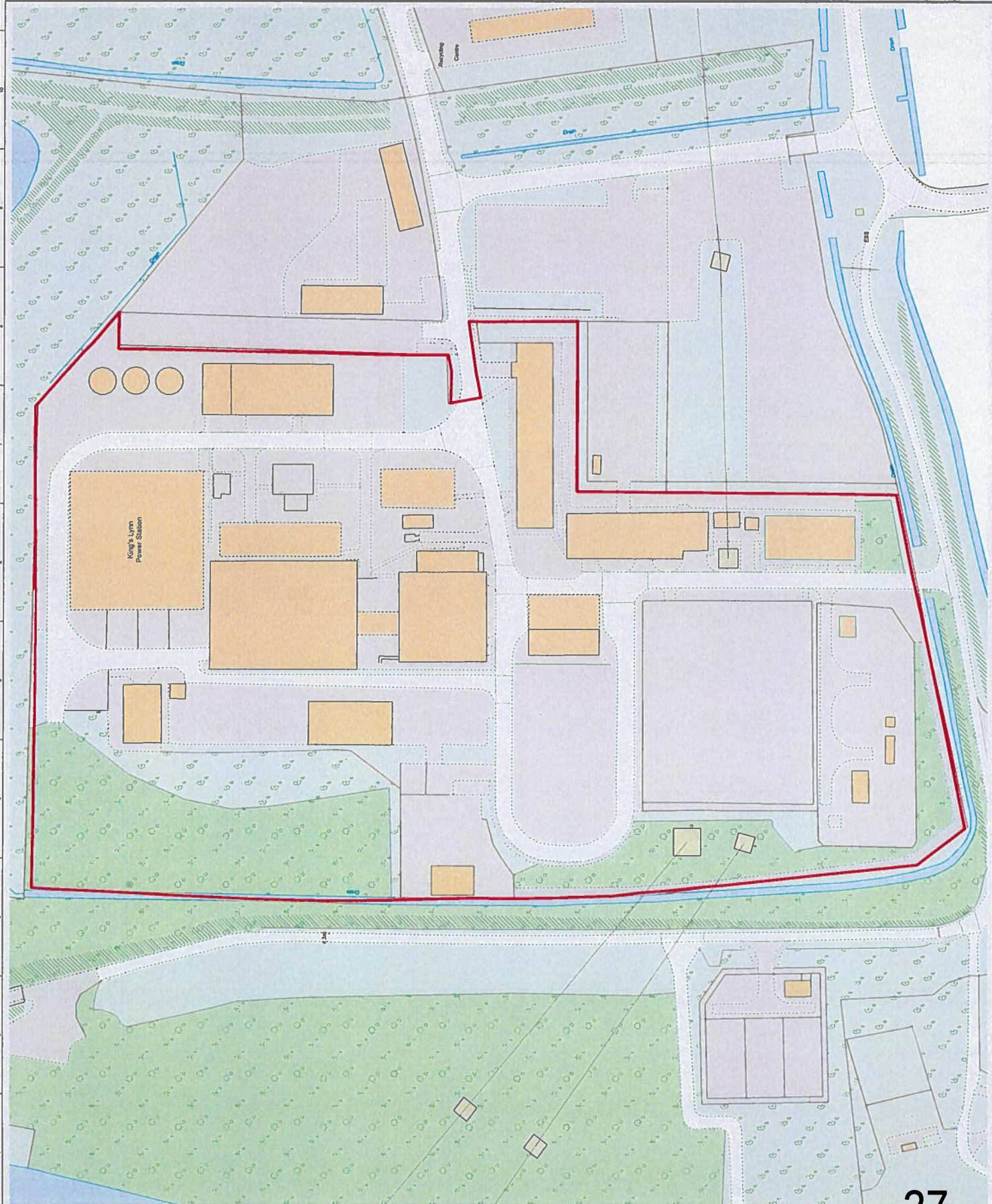
Size of original	Scale of original
A3	1:1,250

**KINGS LYNN
POWER STATION**

PLAN 6
SITE SECURITY
EXTENT OF
INJUNCTION AND
PLAN

STATUS	FINAL
Completed	
In Progress	
Not Started	
On Hold	
Cancelled	
Archived	
Deleted	
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RWE/KNGLY/PMS/0003/B



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 Ransome

SCHEDULE 1: PLANS 1-6





0 20 40 60 80 100
Meters

Key:

Extent of injunction area (3716m)

MJA	WM	Checked	Date	Approved	Rev
			30/08/25	WM	A
THE PERSON NAMED IN THE 'APPROVED BY' COLUMN IS THE PERSON WHO HAS REVIEWED THIS DRAWING AND AGREES TO BE RESPONSIBLE FOR THE CONTENTS AND ACCURACY OF THE INFORMATION CONTAINED HEREIN.					
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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	1:4,250

Site

DIDCOT
POWER STATION

Title

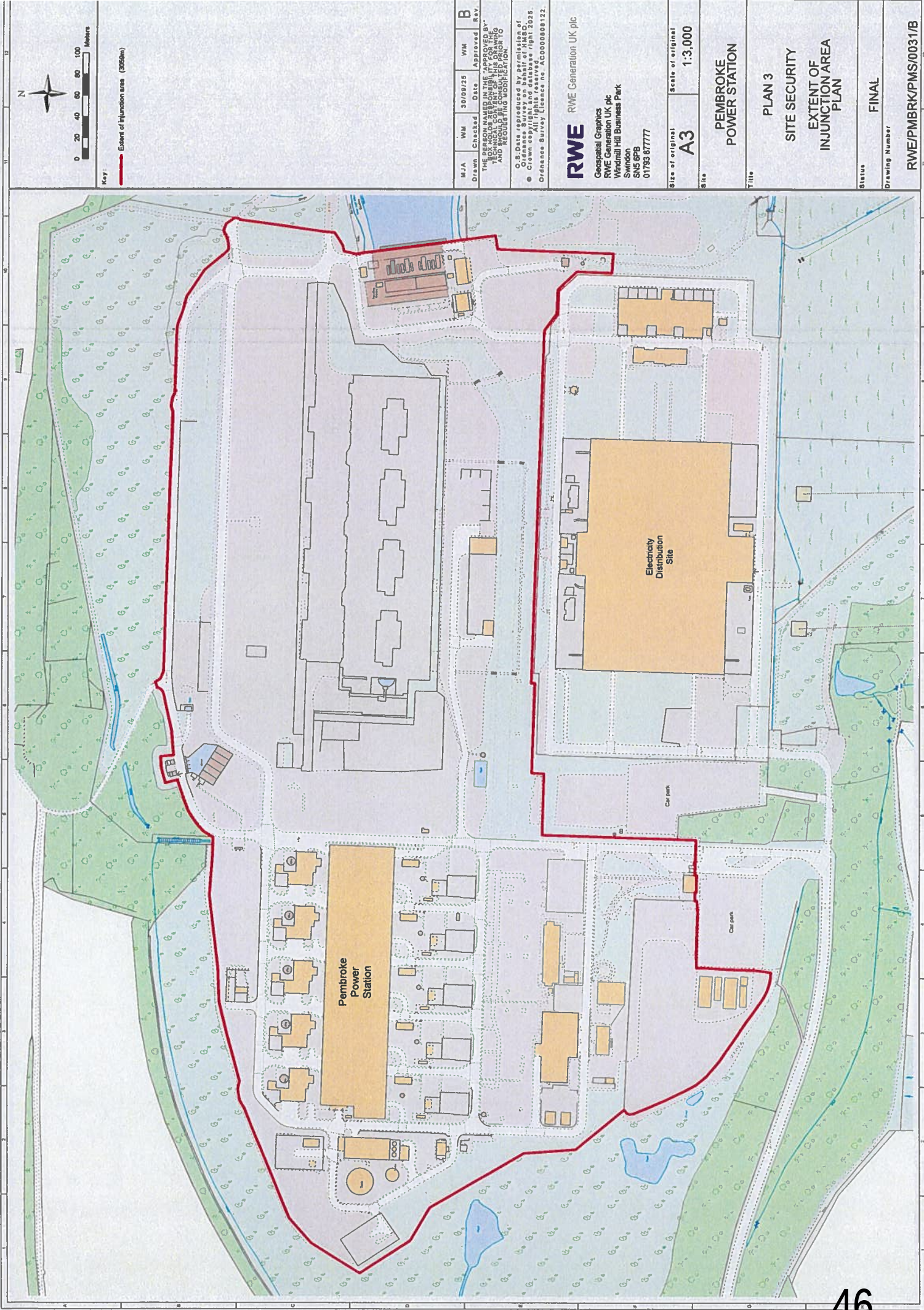
PLAN 2
SITE SECURITY
EXTENT OF
INJUNCTION AREA
PLAN

Status

FINAL

Drawing Number

RWE/DDCOT/PMS/00042/A



Key:

Extent of injunction area (305m)

MJA	WM	30/08/25	WM	Approved	Rev.
Drawn	Checked	Date	Approved	Rev.	B
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RWE

RWE Generation UK plc

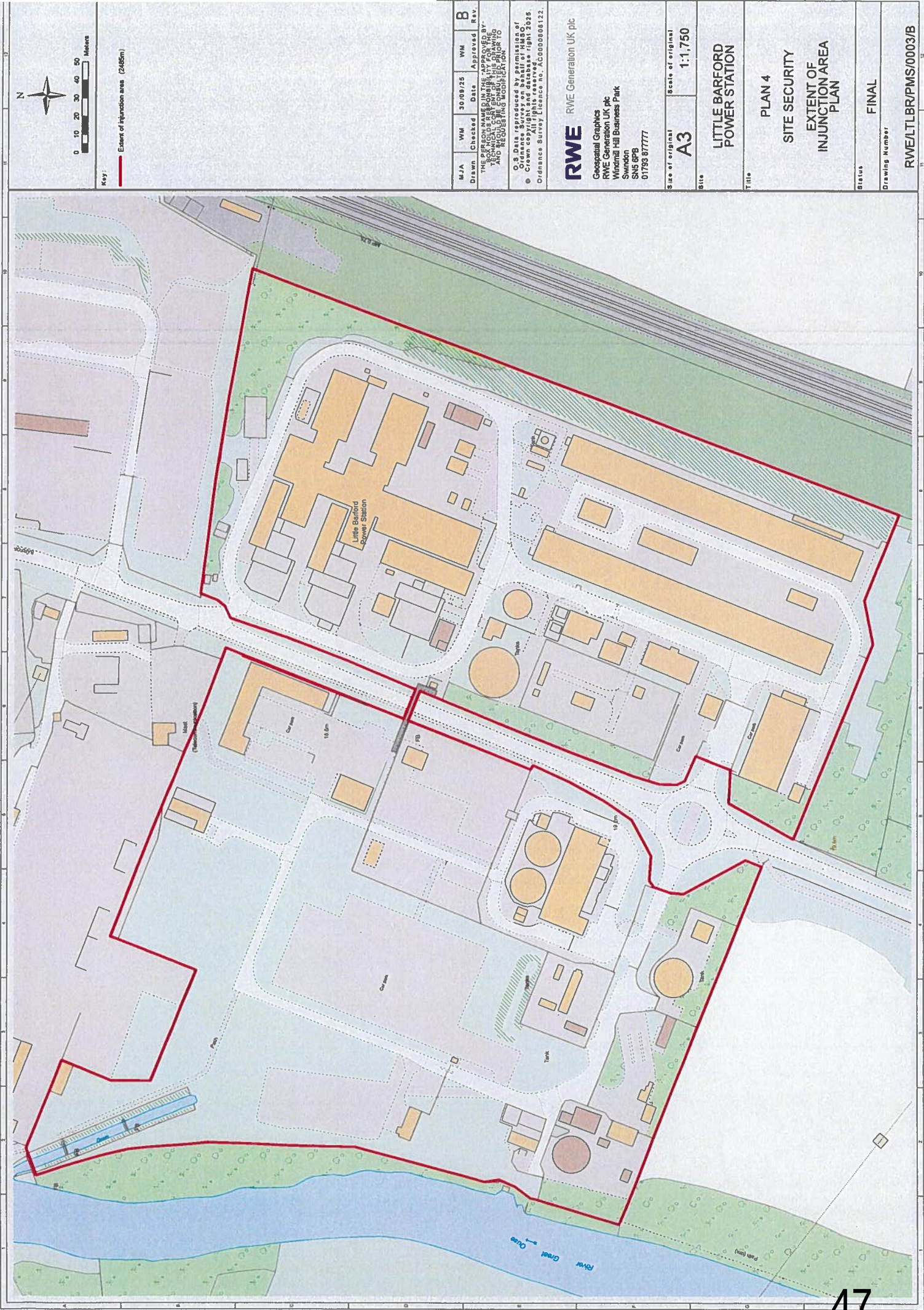
Geospatial Graphics
RWE Generation UK plc
Windmill Hill Business Park
Swindon
SN5 6PB
01793 877777

Size of original	Scale of original
A3	1:3,000

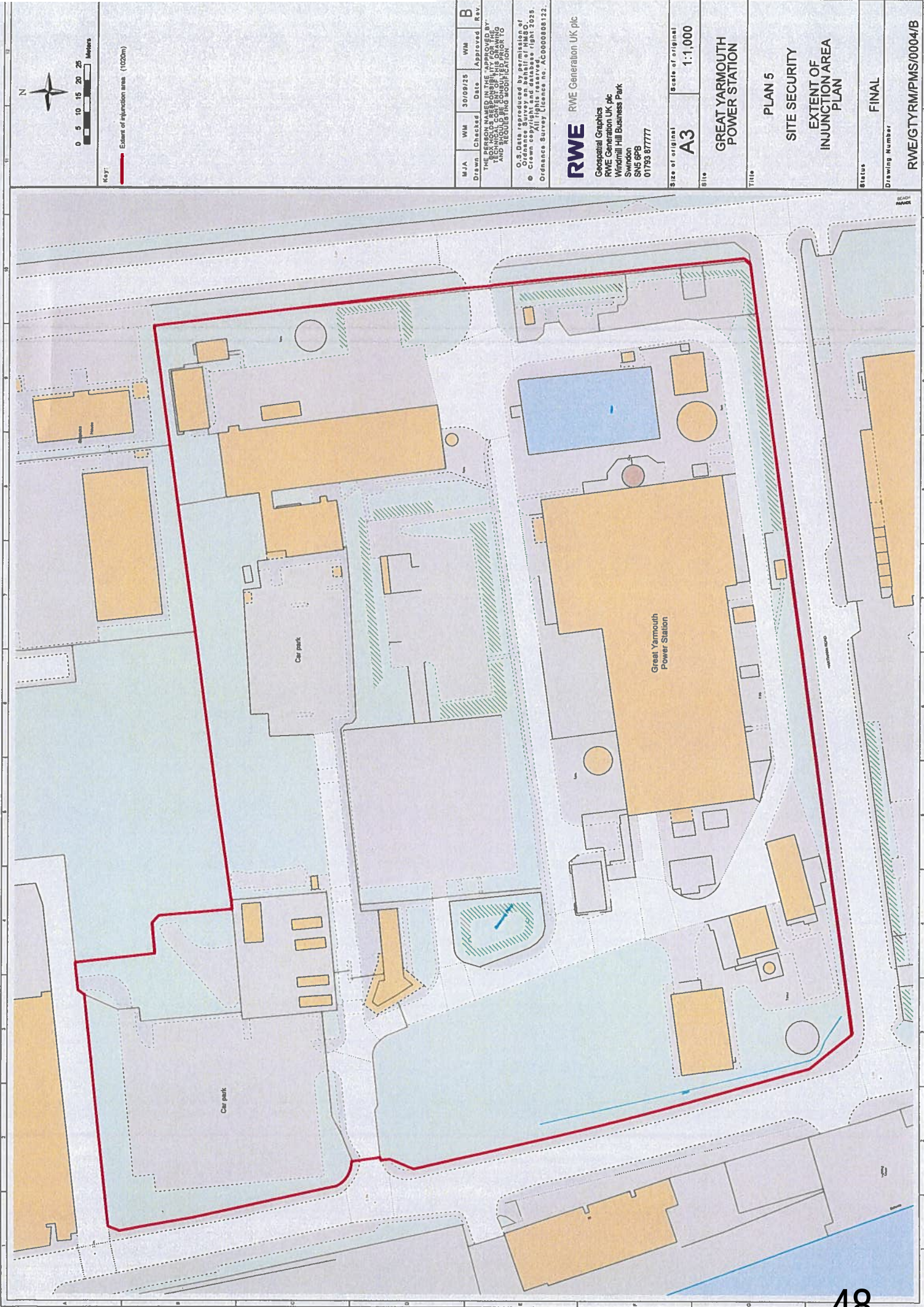
Size
PEMBROKE POWER STATION

Title
PLAN 3 SITE SECURITY EXTENT OF INJUNCTION AREA PLAN

Status
FINAL
Drawing Number
RWE/PMBRK/PMS/0031/B



MJA	WM	30/09/25	WM	Approved	Rev.
Drawn	Checked	Date	Approved	Rev.	B
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Geospatial Graphics					
RWE Generation UK plc					
Windmill Hill Business Park					
Swindon					
SN4 6PB					
01793 877777					
Size of original	A3	Scale of original	1:1,750		
Site	LITTLE BARFORD POWER STATION				
Title	PLAN 4				
	SITE SECURITY				
	EXTENT OF INJUNCTION AREA				
	PLAN				
Status	FINAL				
Drawing number	RWE/TLBR/PMS/0003/B				



MJA	WM	30/09/25	WM	B
Drawn	Checked	Date	Approved	Rev.
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SN5 6PB
01793 877777

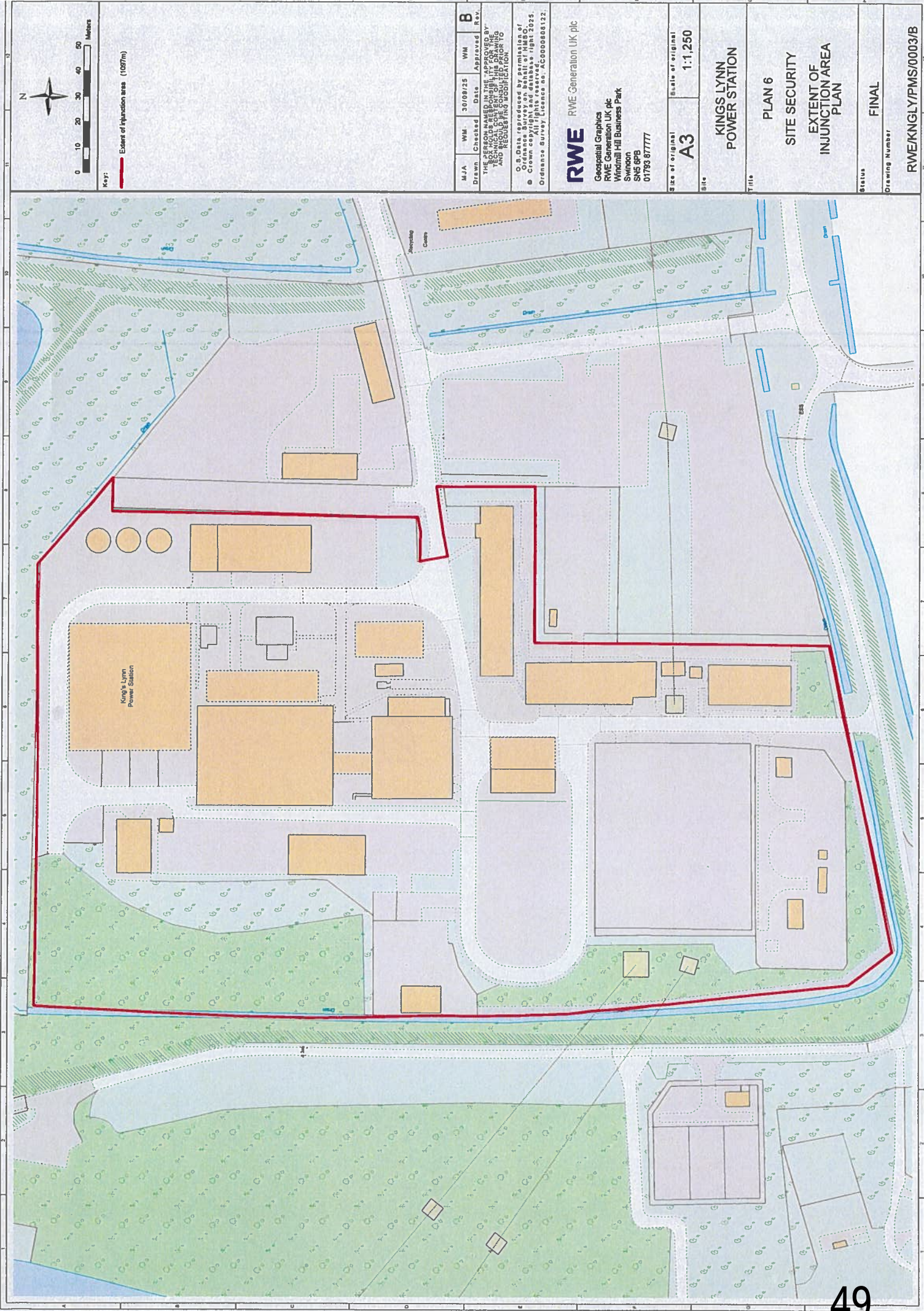
Size of original	Scale of original
A3	1:1,000

Site
GREAT YARMOUTH
POWER STATION

Title
PLAN 5
SITE SECURITY
EXTENT OF
INUNCTION AREA
PLAN

Status
FINAL

Drawing Number
RWE/GTYRM/PMS/0004/B



MJA	WM	30/08/25	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	A3	Scale of original	1:1,250	
Site	KINGS LYNN POWER STATION			
Title	PLAN 6 SITE SECURITY EXTENT OF INJUNCTION AREA PLAN			
Status	FINAL			
Drawing Number	RWE/KNGLY/PMS/0003/B			

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

.....
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
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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

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I www.rwe.com

Registered Office:
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and Wales no. 013892782

...



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, light blue circular watermark.

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

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I www.rwe.com

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Wiltshire SN5 6PB

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and Wales no. 03892782

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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

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. If you suspect this email is malicious, please use the 'Report Phish' button.

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 **]:**
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 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 | [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 the 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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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?

Error 403 - Forbidden

The web app you have attempted to reach has
blocked your access.

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

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Zindelstraße 12
45128 Essen
www.up-onlineagentur.de

 [up! bei LinkedIn](#)

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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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.

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
injunctons@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



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Meters

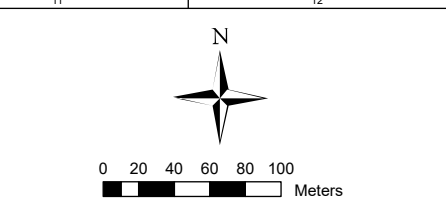
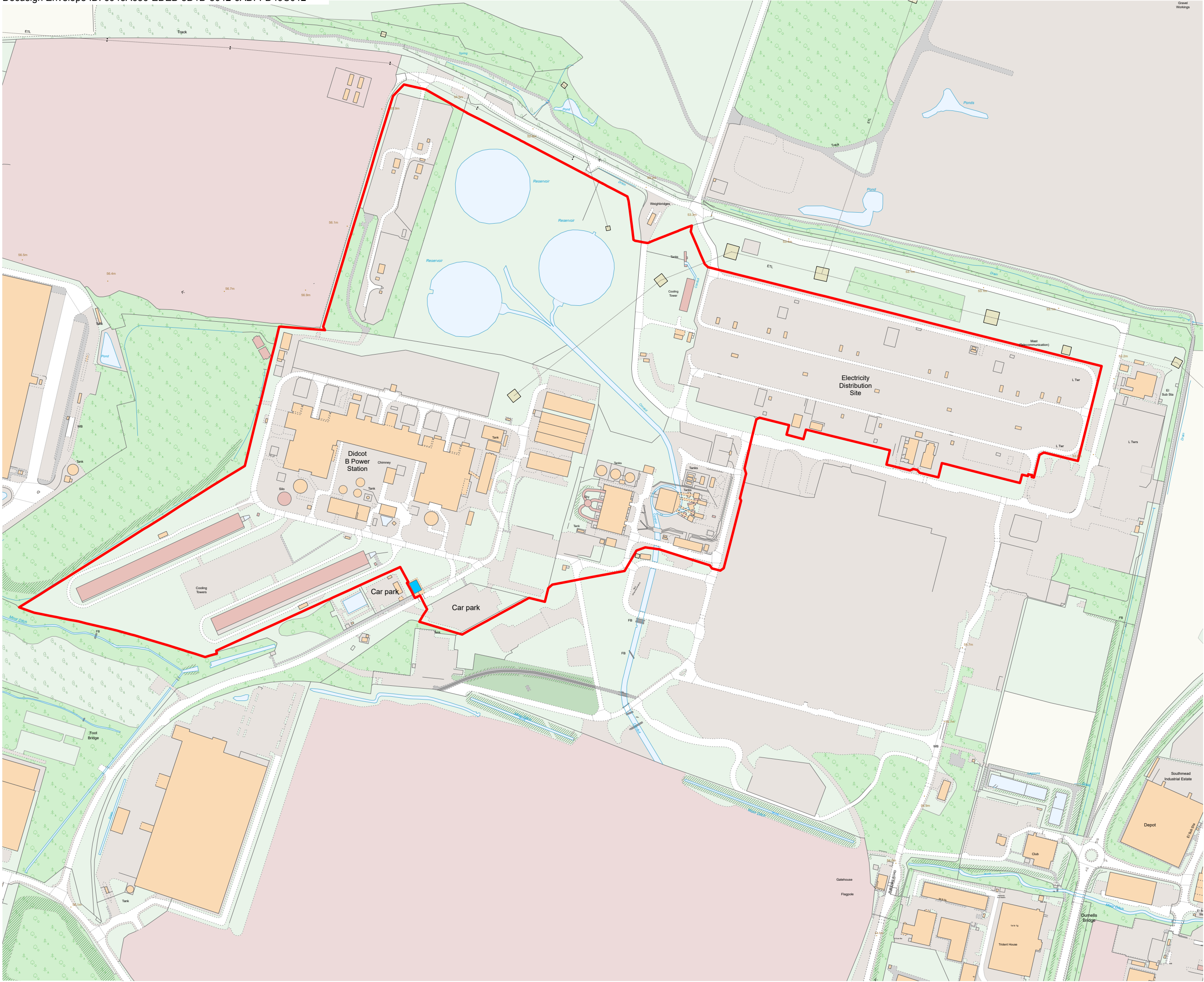
Key:

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/PMS/0009/A				

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- Key:
- Extent of injunction area (3716m)
 - Gatehouse

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

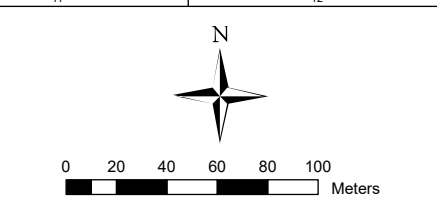
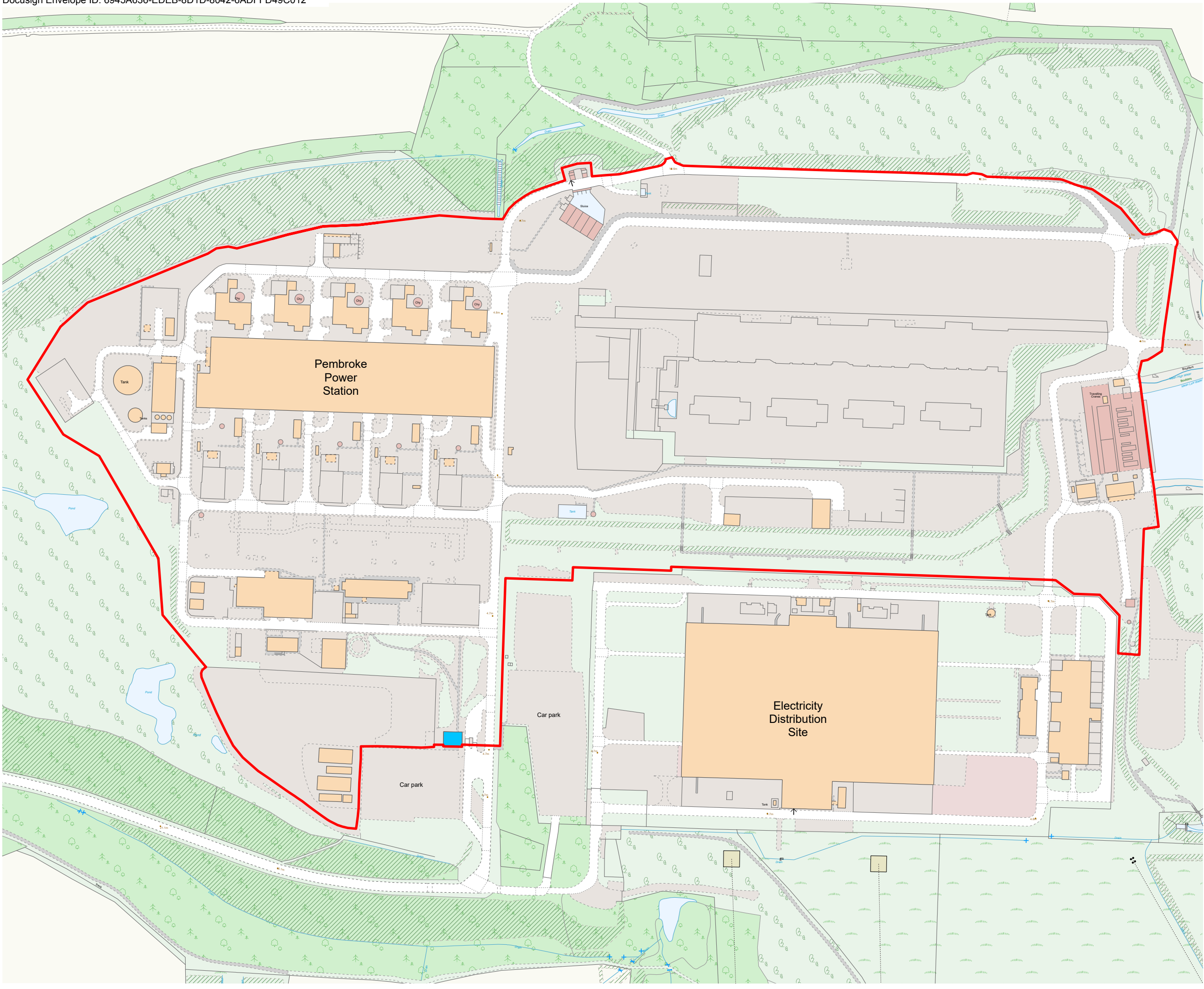
Size of original	Scale of original
A3	1:4,250

Site
**DIDCOT
POWER STATION**

Title
**PLAN 2 2026
SITE SECURITY
LOCATION OF
GATEHOUSE
PLAN**

Status
FINAL

Drawing Number
RWE/DDCOT/PMS/0029/A
78



- Key:
- Extent of injunction area (3059m)
 - Gatehouse

MJA	RS	17/08/26	RS	A
Drawn	Checked	Date	Approved	Rev.

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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/PMBRK/PMS/0078/A



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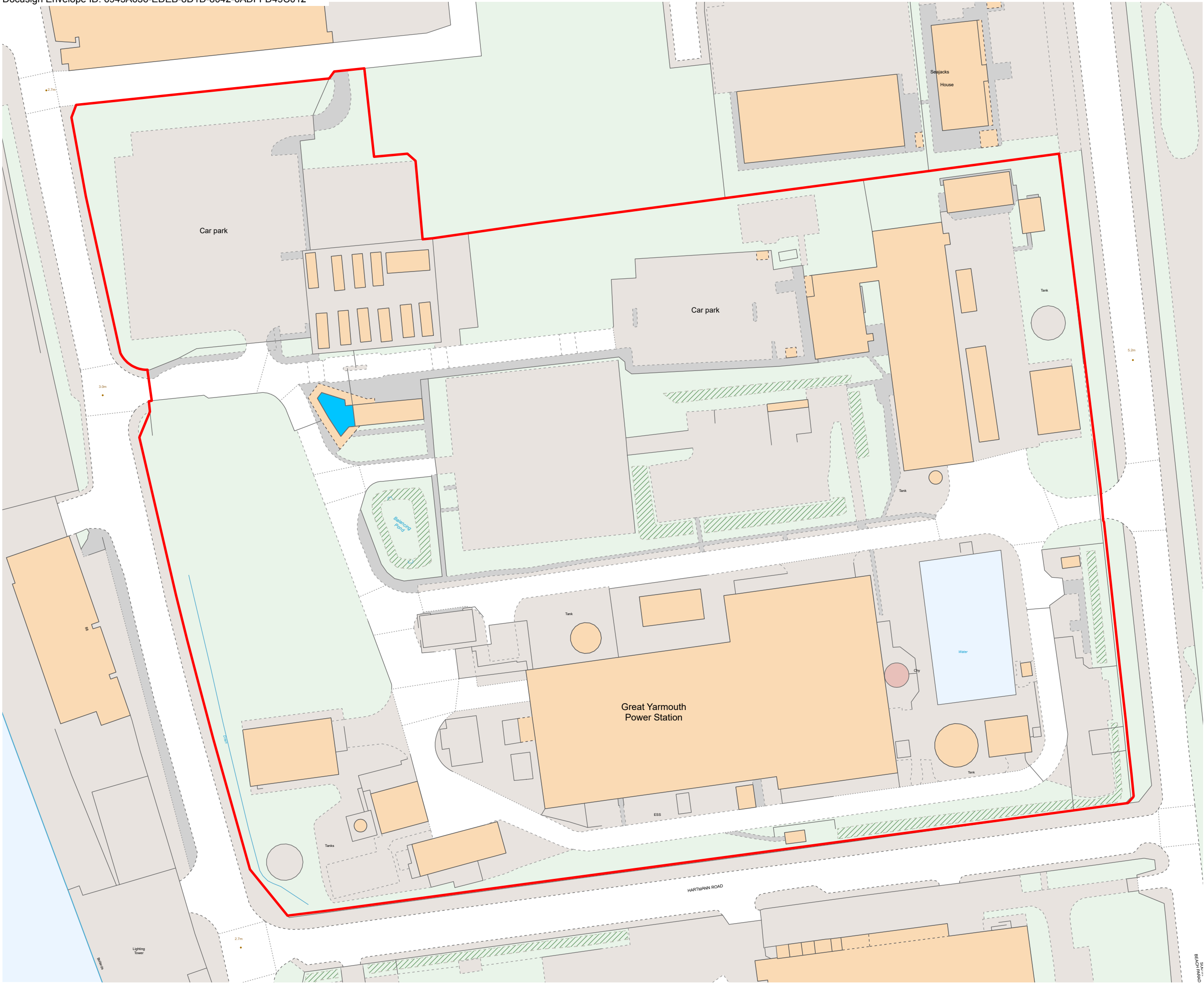
Key:

Extent of injunction area (2485m)

Gatehouse

MJA	RS	17/08/26	RS	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		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/LTLBR/PMS8008/A				

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Meters

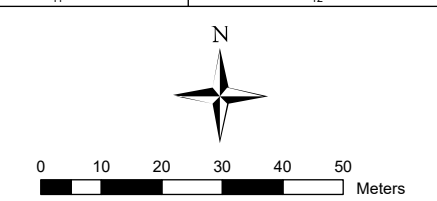
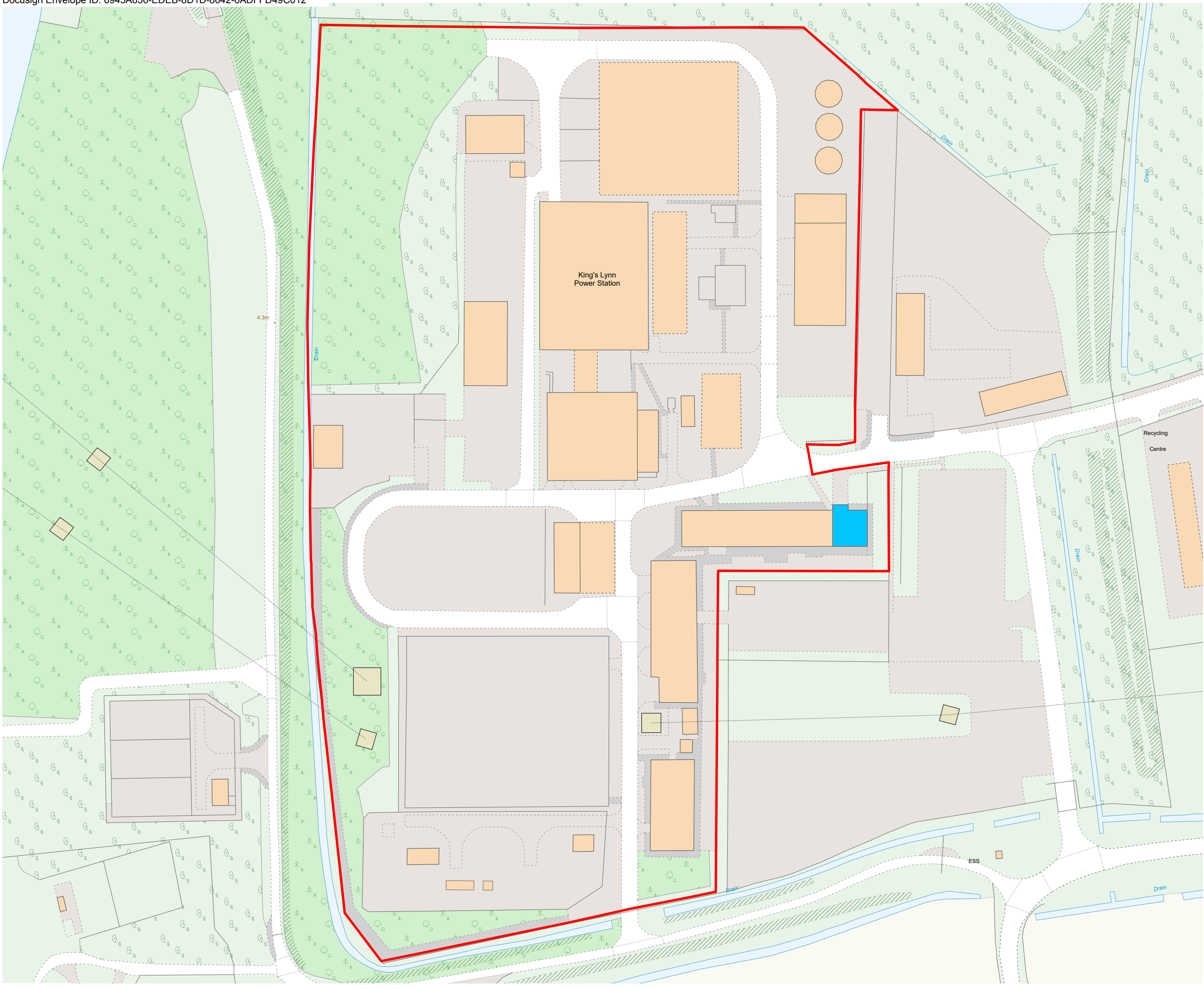
Key:

Extent of injunction area (1020m)

Gatehouse

MJA	RS	17/08/26	RS	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		Scale of original		
A3		1:1,000		
Site				
GREAT YARMOUTH POWER STATION				
Title				
PLAN 5 2026 SITE SECURITY LOCATION OF GATEHOUSE PLAN				
Status				
FINAL				
Drawing Number				
RWE/GTYRM/PMS0008/A				

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Key:

— Extent of injunction area (1097m)

◆ Gatehouse

MJA	RS	17/08/26	RS	A
Drawn	Checked	Date	Approved	Rev.

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RWE RWE Generation UK plc

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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/KNGLY/PMS007/A







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

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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 OR IN SUPPORT OF ANY GREENPEACE CAMPAIGN OR OTHERWISE.

Claim: PT-2025-001017 – RWE Generation UK PLC v (1) Persons Unknown, (2) Greenpeace UK 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 Pembrokeshire, 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 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 was listed for hearing in a 3 day window from 19 October 2025 with a time estimate of half a day. Please see the Notice of Hearing for further information on the precise listing of the hearing.

To view in hard copy, at the **OPEN HERE** site, the location of which are shown printed in blue on the enclosed Site Map.

Osborne Clarke LLP
 One London Wall, London, EC2Y 5EB T: +44 (0)20 7611 7000 F: +44 (0)20 7611 7005

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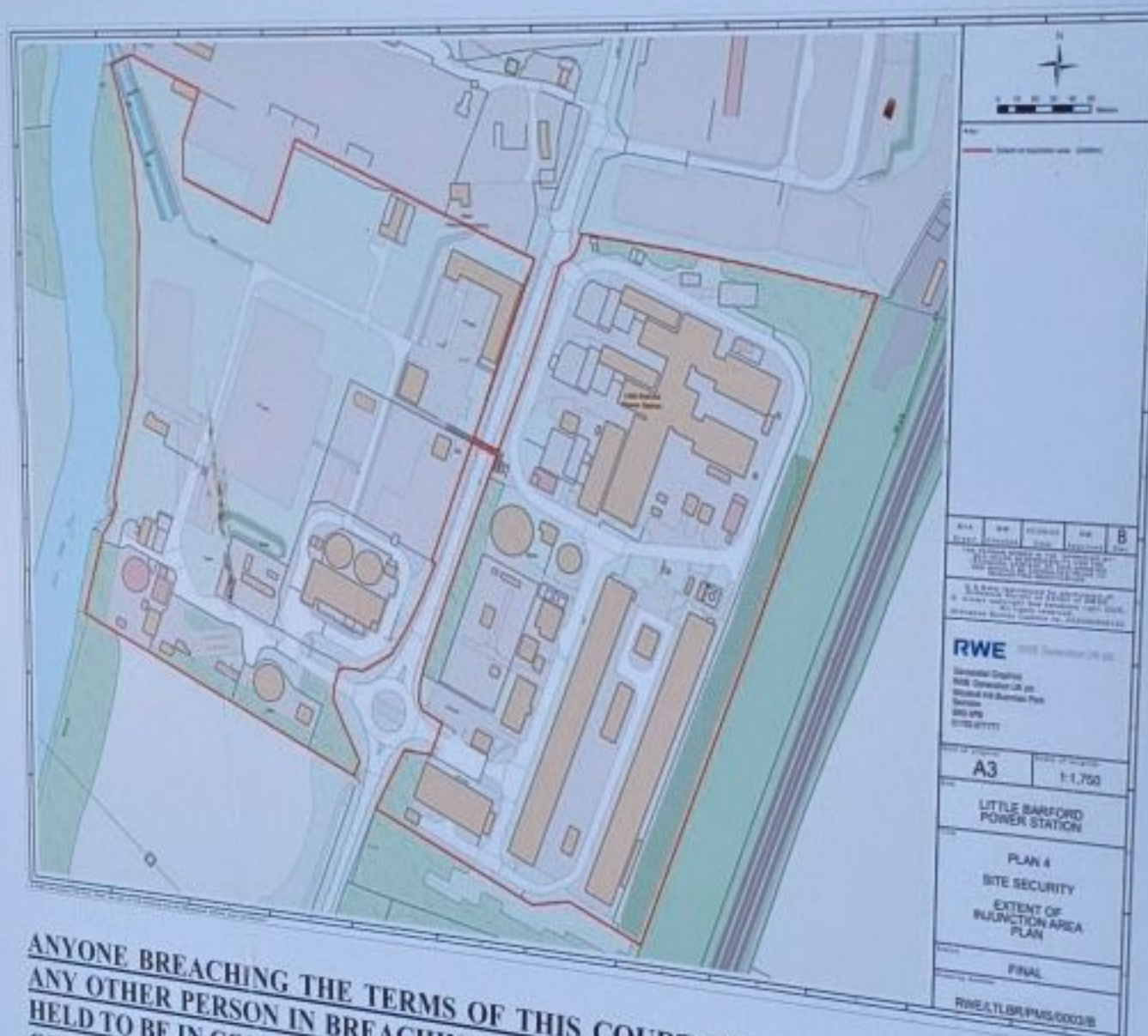


WARNING NOTICE OF COURT INJUNCTION

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.rwc.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.rex.com/injunction> or obtained by e-mailing injunction@osborneclerke.com

Osborne Clarke

Osborne Clarke is a leading law firm with over 100 years of experience. We are a full-service law firm, providing legal advice and representation in a wide range of areas, including commercial, corporate, litigation, and regulatory. Our team of experts is dedicated to providing high-quality legal services to our clients, ensuring their interests are protected and their goals are achieved.

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.

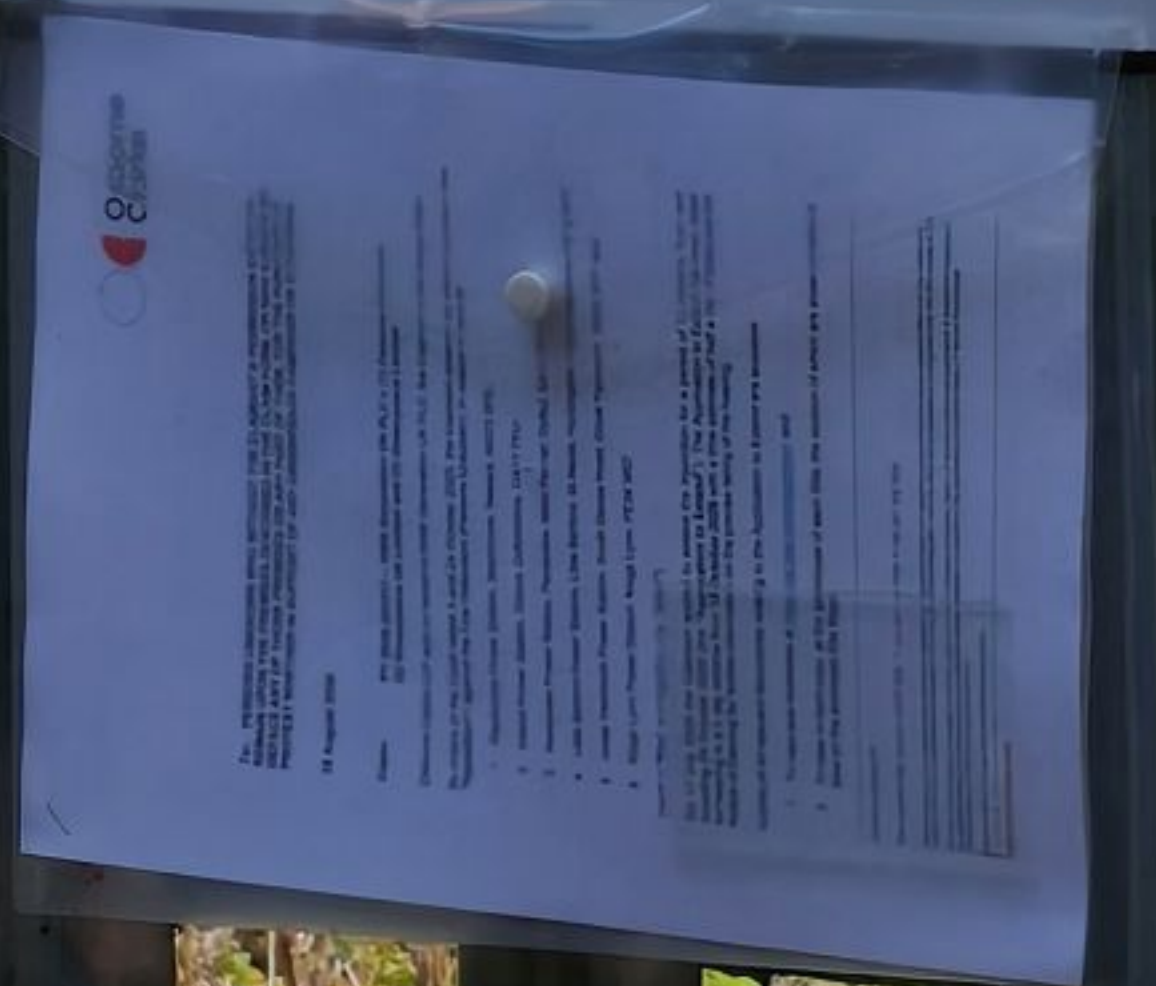
The injunction means you may not:

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:



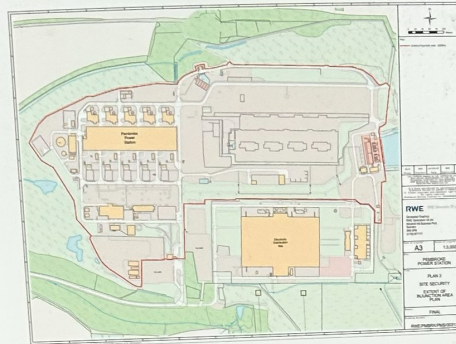
ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

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



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



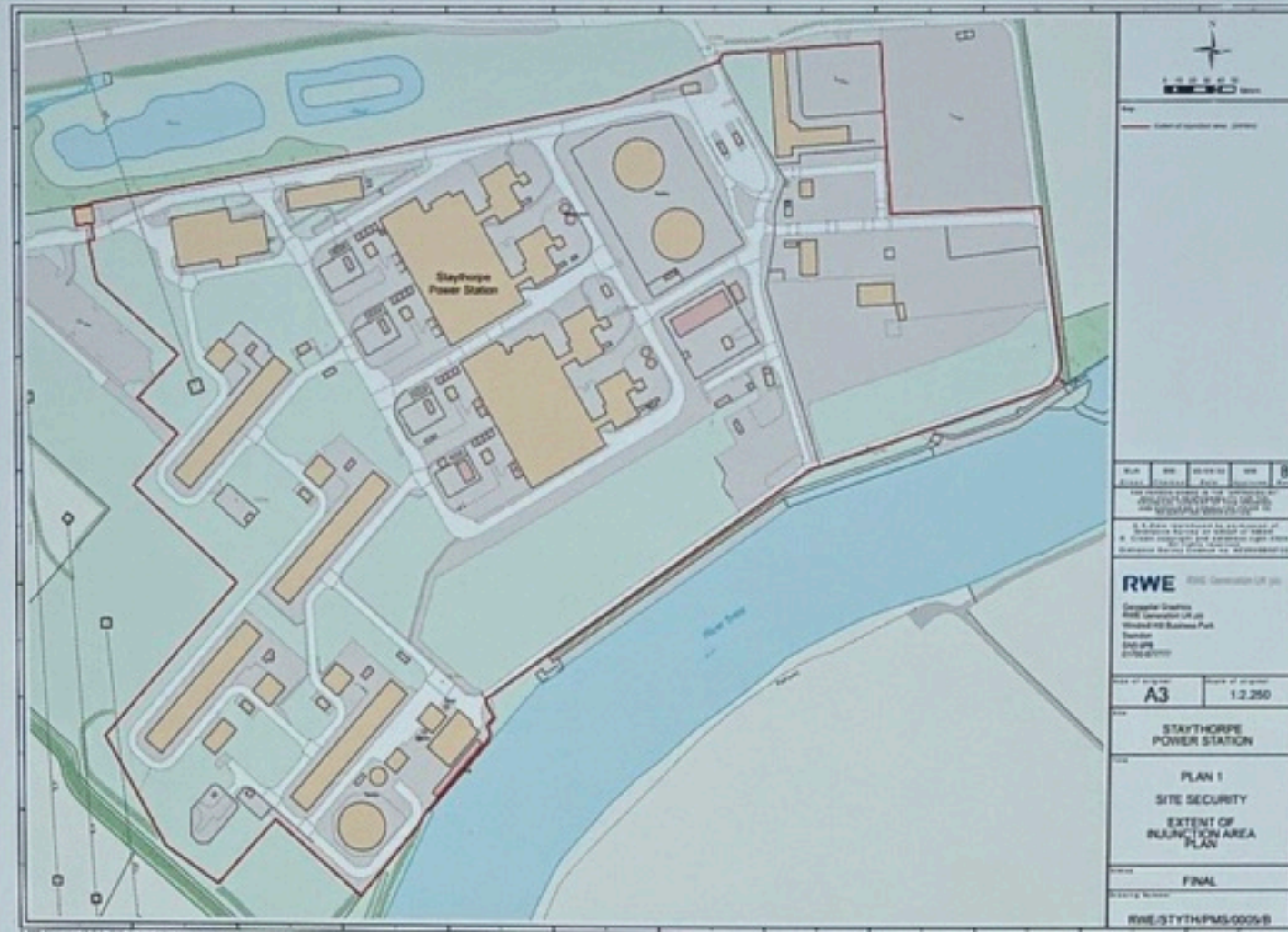


WARNING NOTICE OF COURT INJUNCTION

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 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

TUFFXTREME®
REGALTAGS® | RT1238

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.

NEVER OPEN

Osborne Clarke LLP acts on behalf of RWE Generation PLC, the Claimant.

By order of the Court dated 3 and 24 October 2025, the Claimant obtained an Injunction (the "Injunction") against the First Defendant (Person(s) Unknown), in relation to land at:

1. Staythorpe Power Station, Staythorpe, Newark, NG23 5RQ;
2. Dabot Power Station, Dabot, Oxfordshire, OX11 7YU;
3. Pembroke Power Station, Pembroke, West Pembrokeshire, SA71 6SS;
4. Little Barford Power Station, Little Barford, St Neots, Huntingdon, Cambridgeshire, PE19 6Y1;
5. Great Yarmouth Power Station, South Dennis 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 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 hearing on 3. The hearing will take place on the 3rd day 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 premises of each Site, the location of which are shown attached in the Maps.

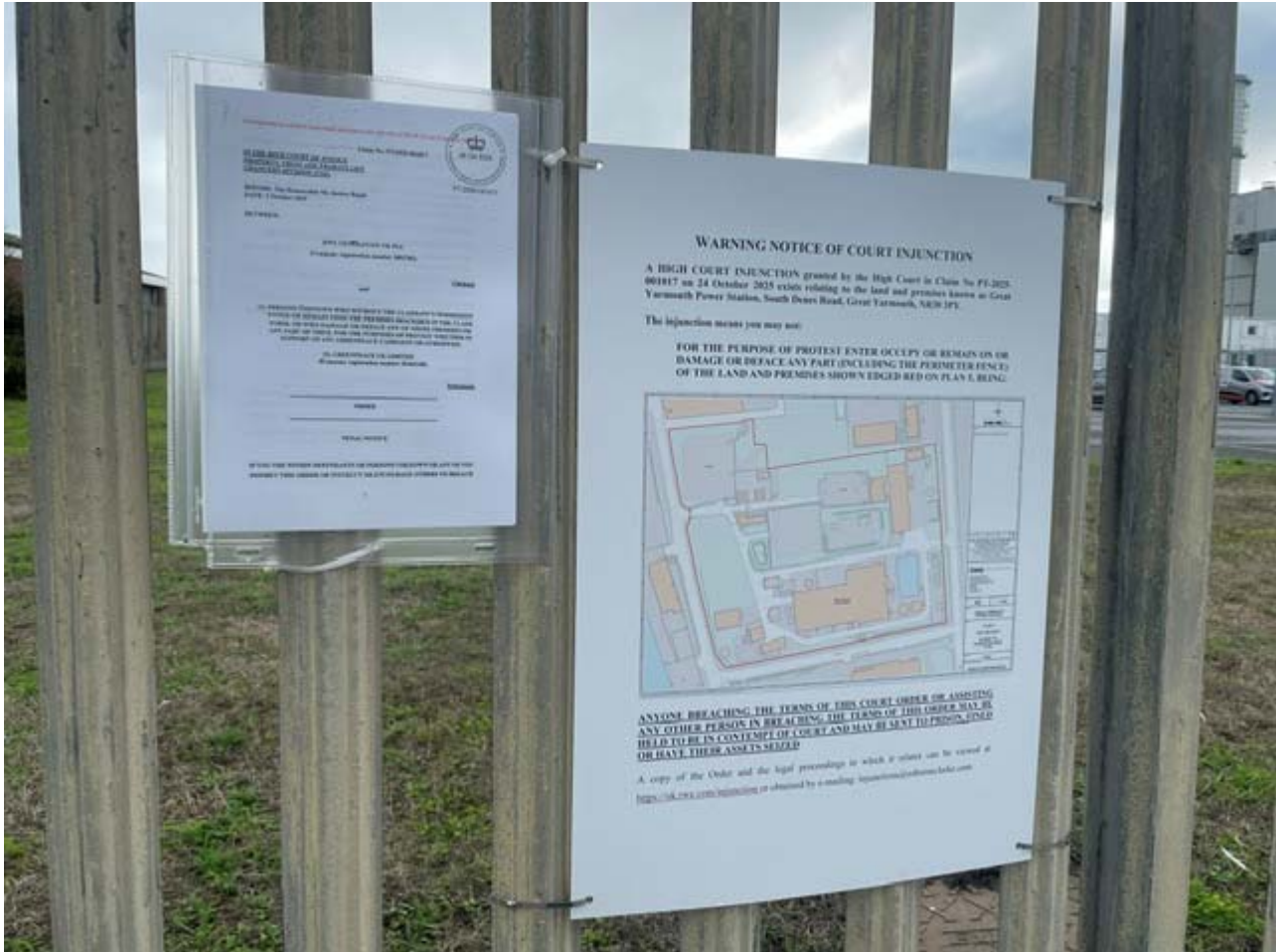
OPEN HERE



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

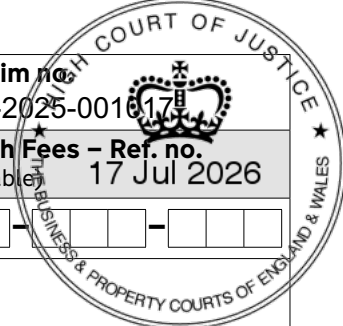
If you wish to attend in person to discuss and list this matter, please email the listing officers at chanceryjudgeslisting@justice.gov.uk confirming when yourself and the other party representatives intend to attend the list office.

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? 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)



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 that reads 'Osborne 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.

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

.....
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 'Osborne Clarke LLP'.

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

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.

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Osborne Clarke LLP is part of an international legal practice.



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

injunctios@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 a horizontal line.

**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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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

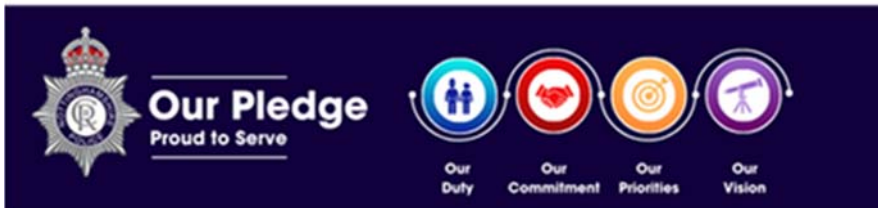


T/DS 3213 Millie Gillett
Mansfield CID - Team 1

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](#)[illegible]

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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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IN THE HIGH COURT OF JUSTICE
CHANCERY 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

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>

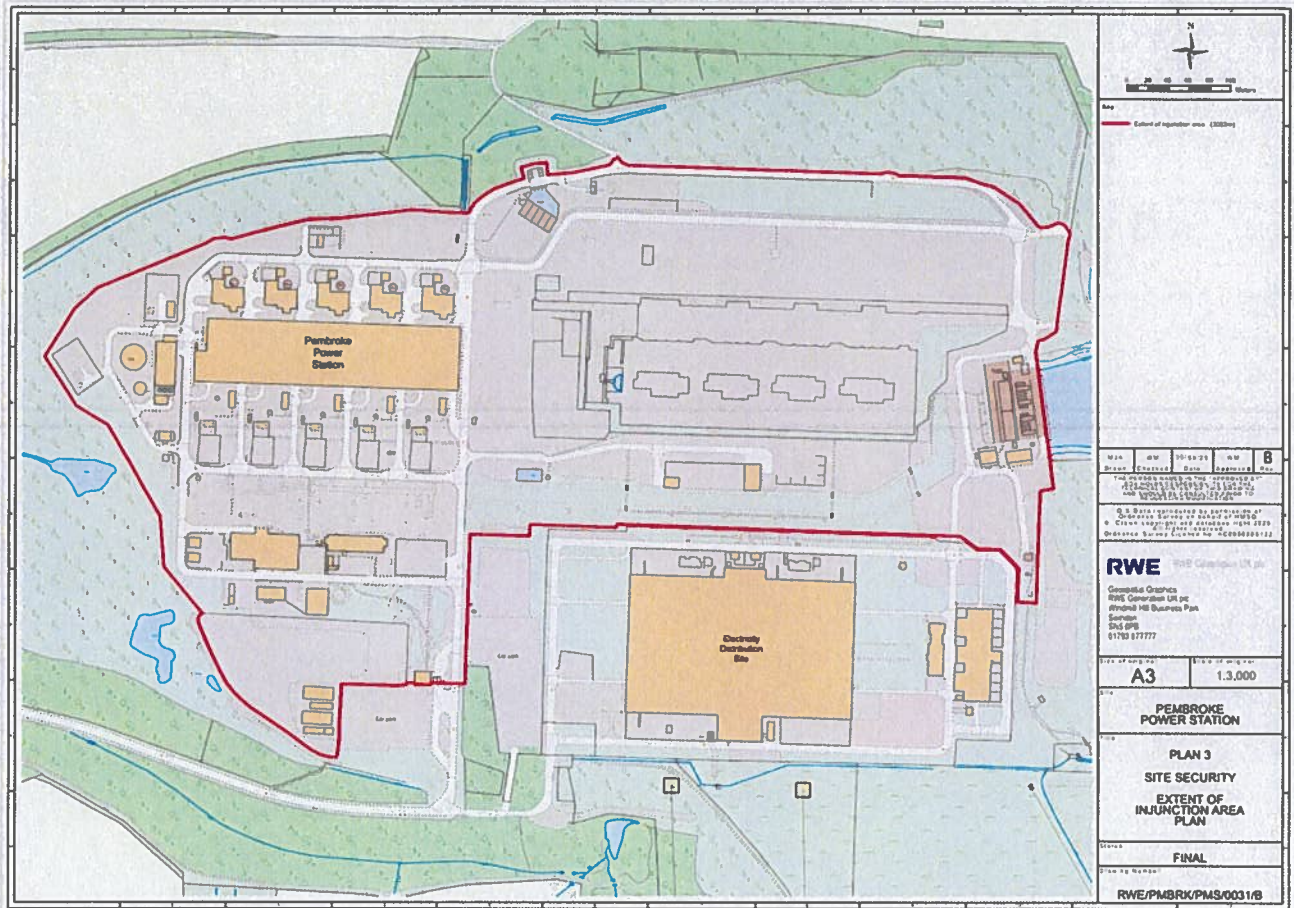
Dated: 24 October 2025

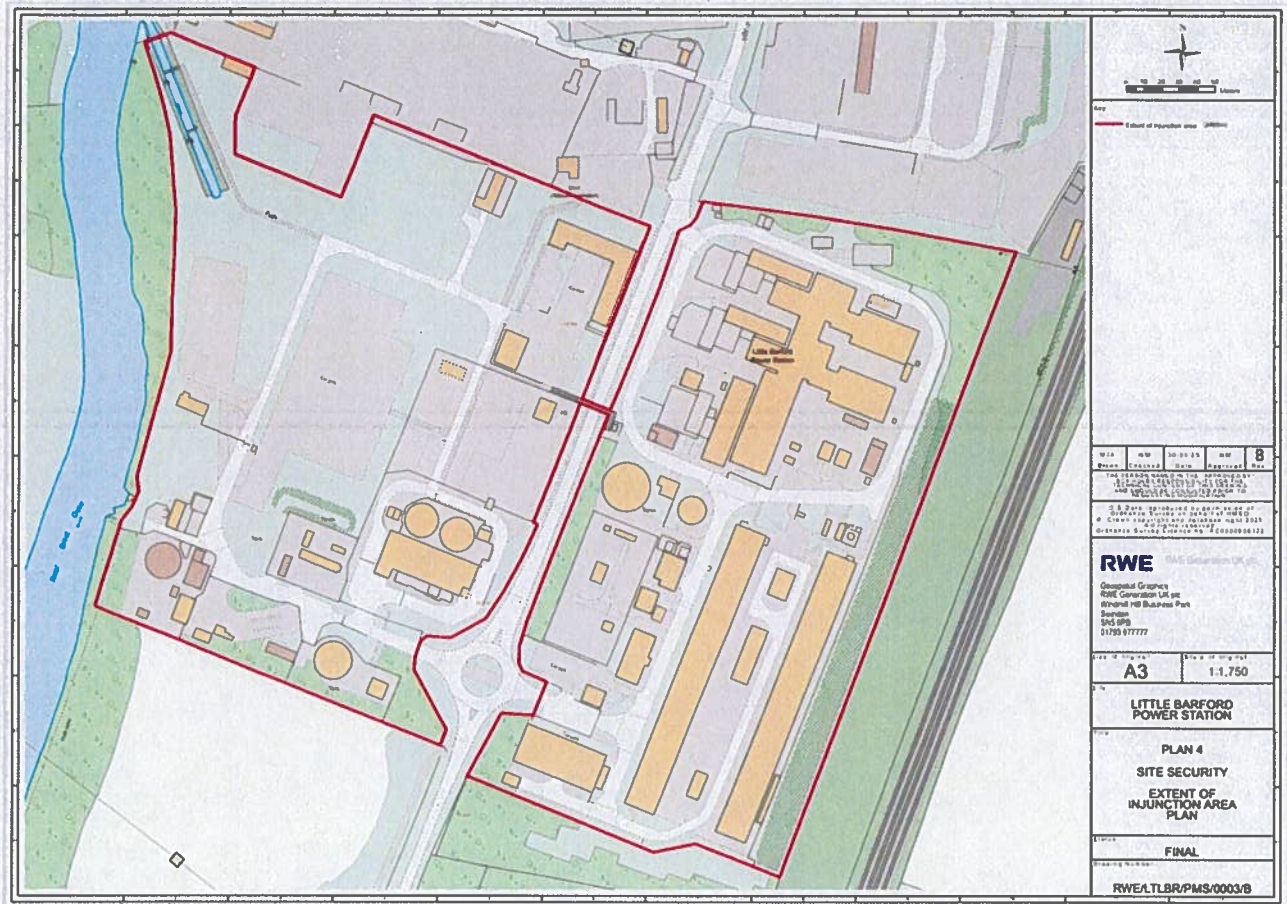
SCHEDULE 1 – CLAIMANT’S UNDERTAKINGS

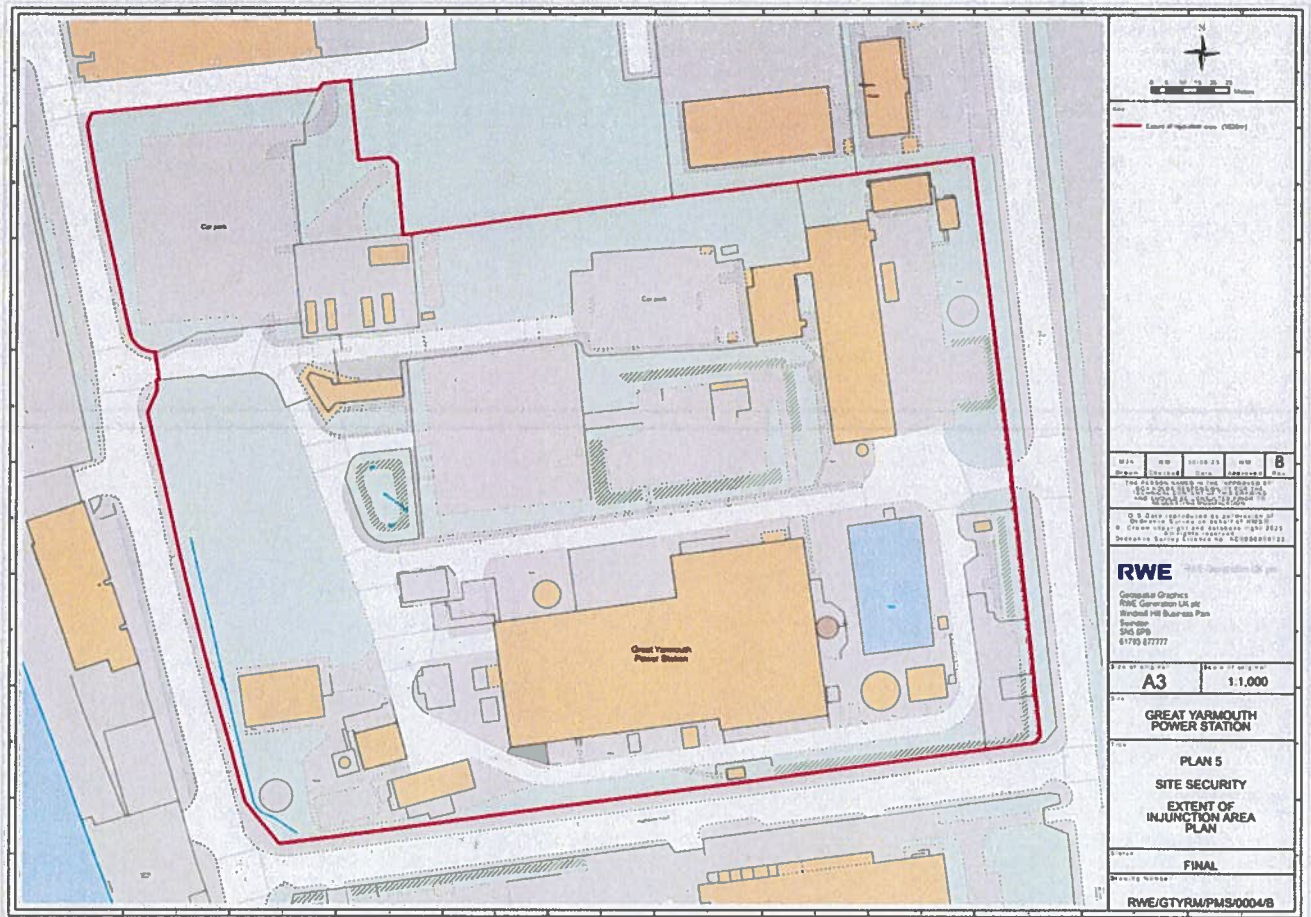
1. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraphs 1 or 2 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

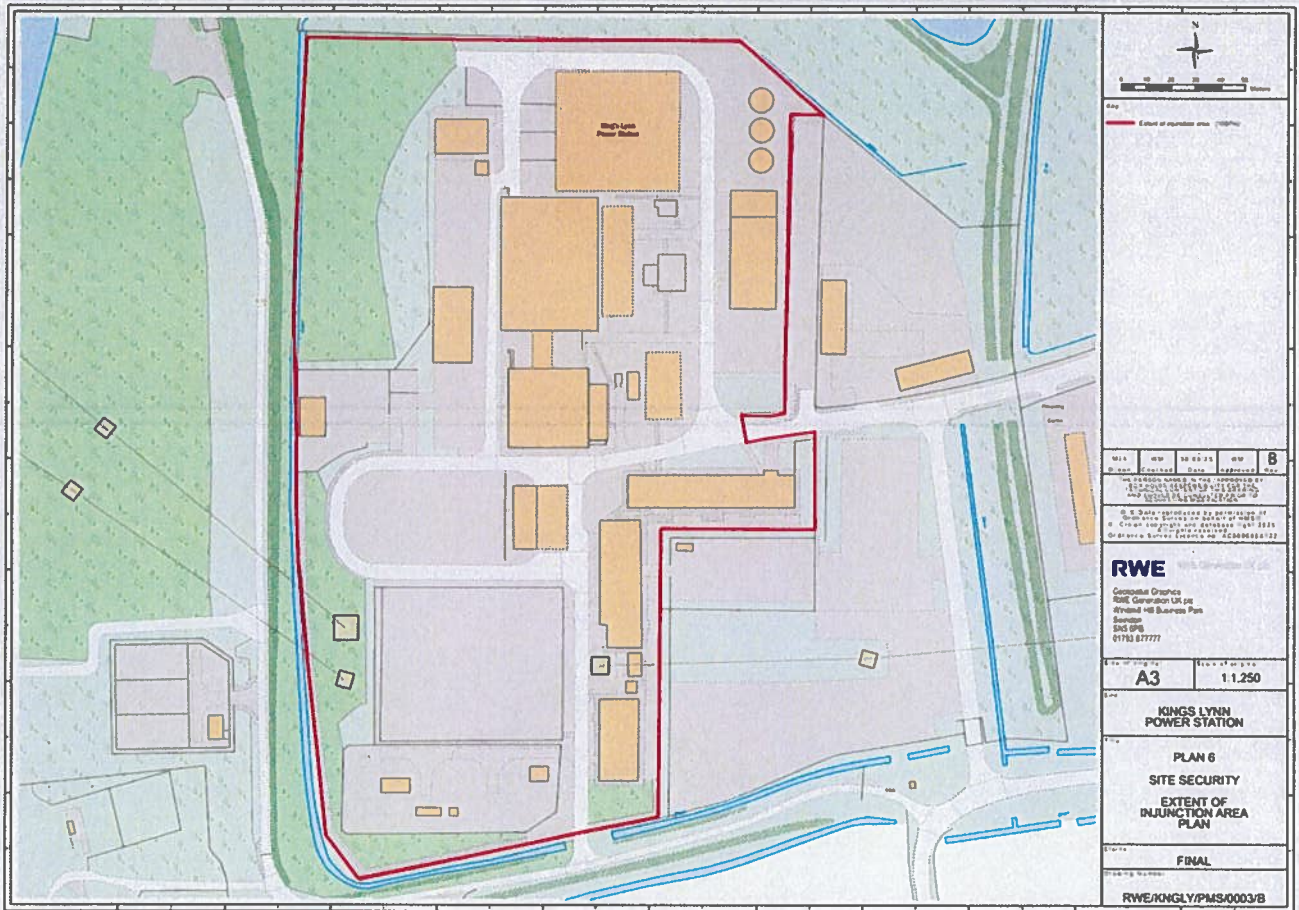
SCHEDULE 2 – PLANS











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: [Signature]

SCHEDULE 1: PLANS 1-6



MJA	WM	Date	WM	Rev.
Drawn	Checked	NAMED IN THE APPROVED BY"	Approved	Rev.
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RWE RWE Generation UK plc				
Geospatial Graphics RWE Generation UK plc Windmill Hill Business Park Windsor SN5 6PB 01753 877777				
Size of original	A3	Scale of original	1:2,250	
Site	STAYTHORPE POWER STATION			
Title	PLAN 1			
	SITE SECURITY			
	EXTENT OF INJUNCTION AREA PLAN			
Status	FINAL			
Drawing Number				
	RWE/STYTH/PMS/0005/B			





Key:

Extent of inflection area (3716m)

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

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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	1:4,250

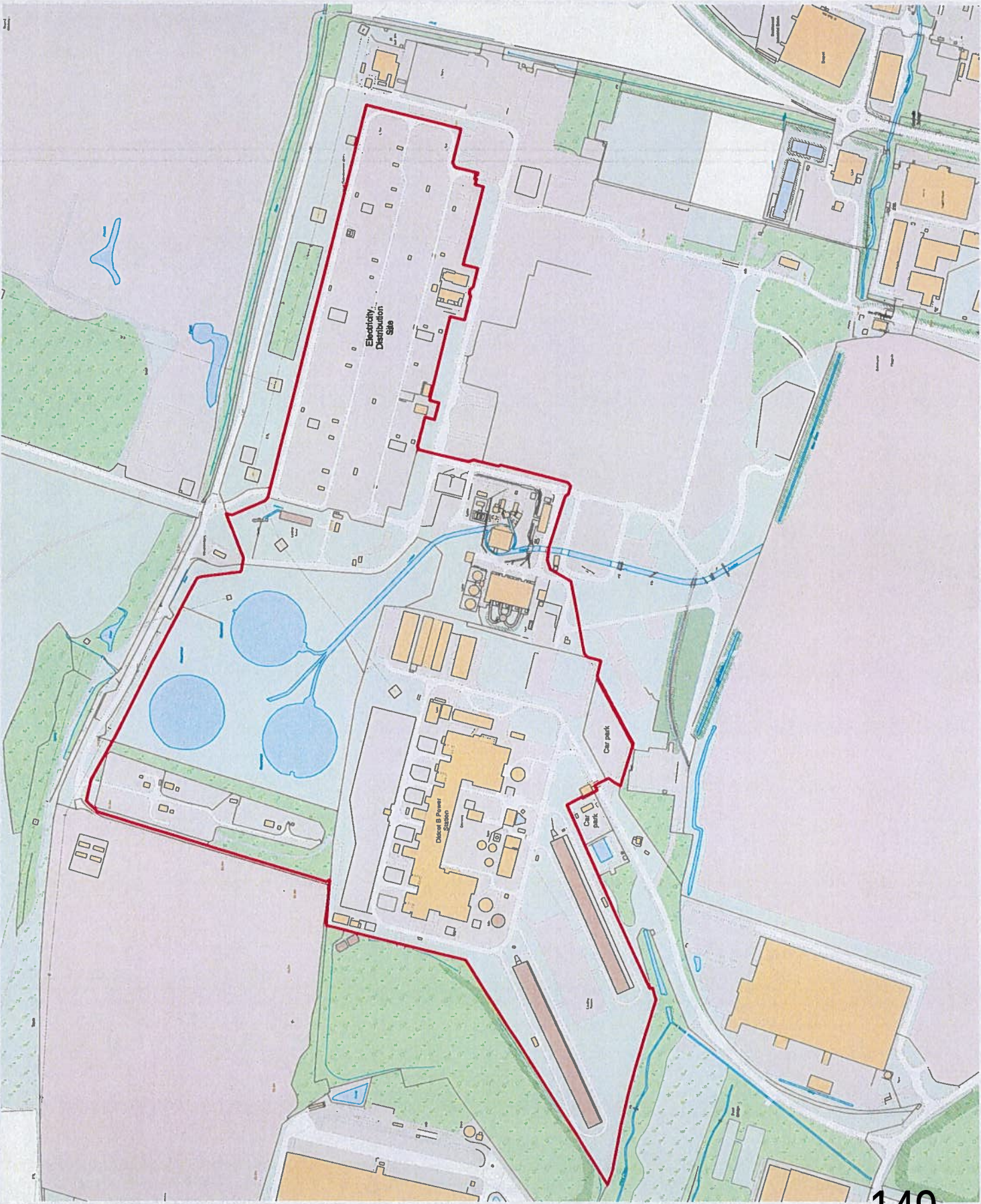
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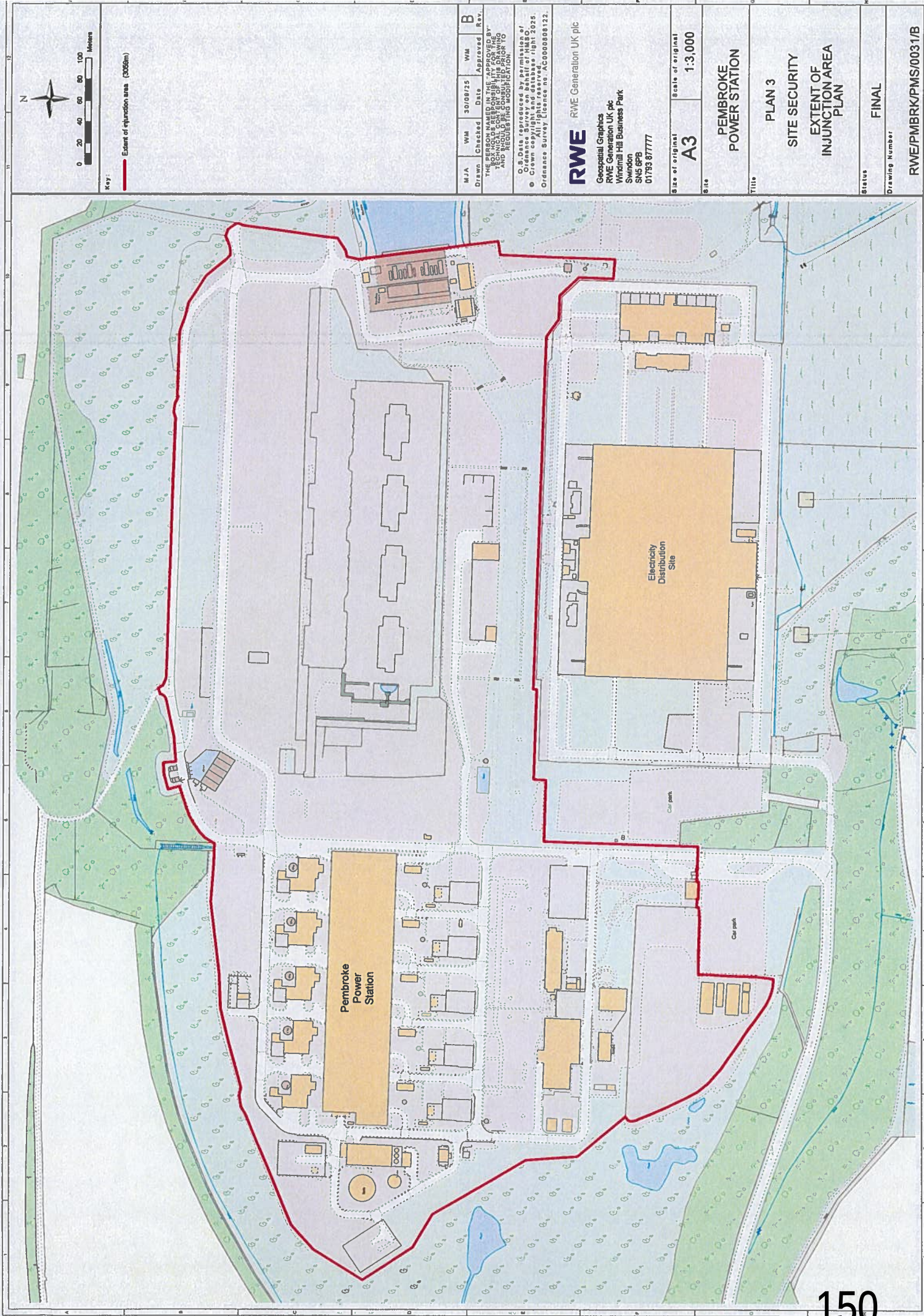
**DIDCOT
POWER STATION**

PLAN 2
SITE SECURITY
EXTENT OF
INJUNCTION AREA
PLAN

Status

RWE/DDCOT/PMS/0042/A





Key:

Extent of injunction area (300m)

M/A	Drawn	Checked	WM	Date	Approved	Rev.
				30/08/25		B
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Stratford
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01793 617777

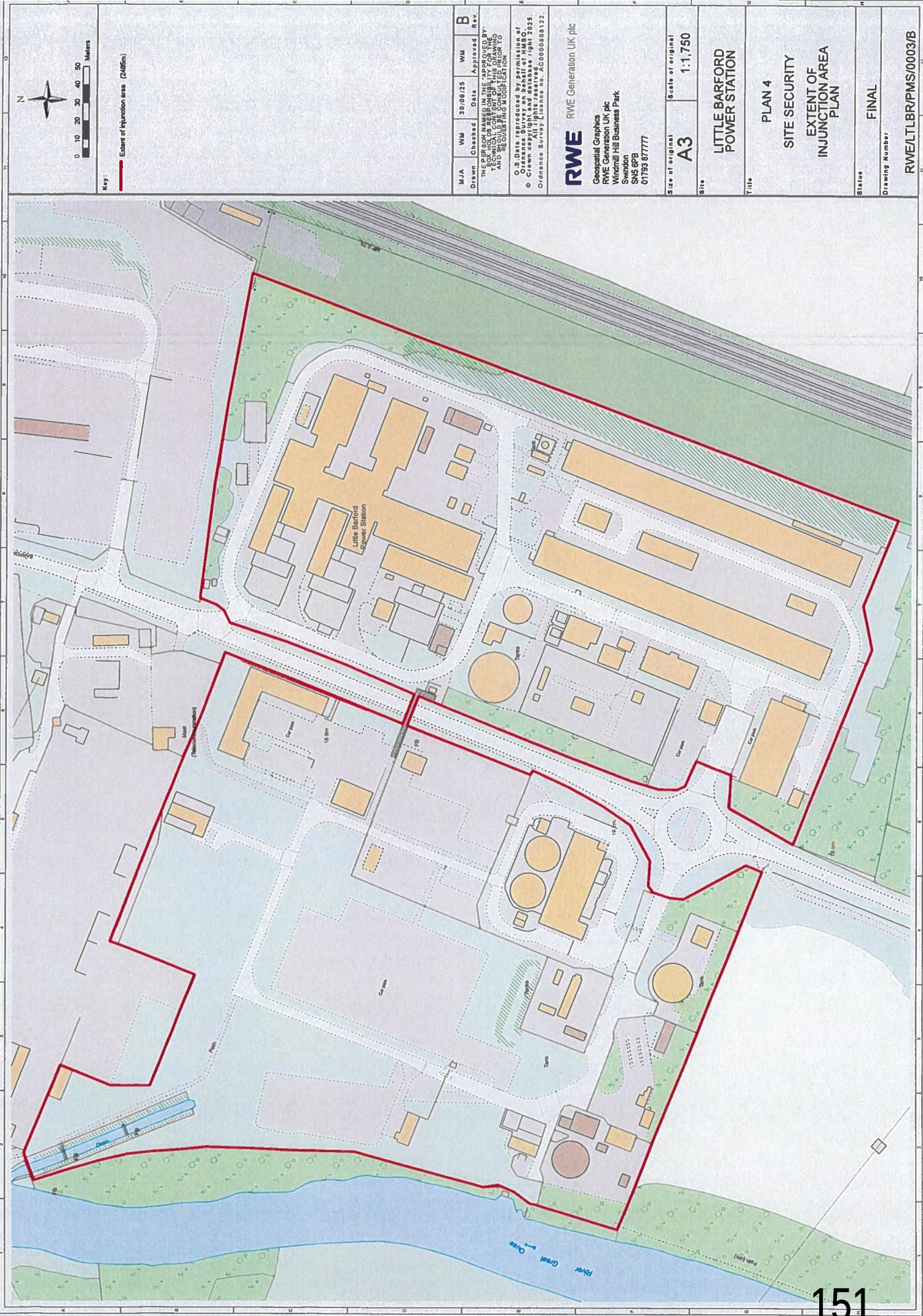
Size of original	Scale of original
A3	1:3,000

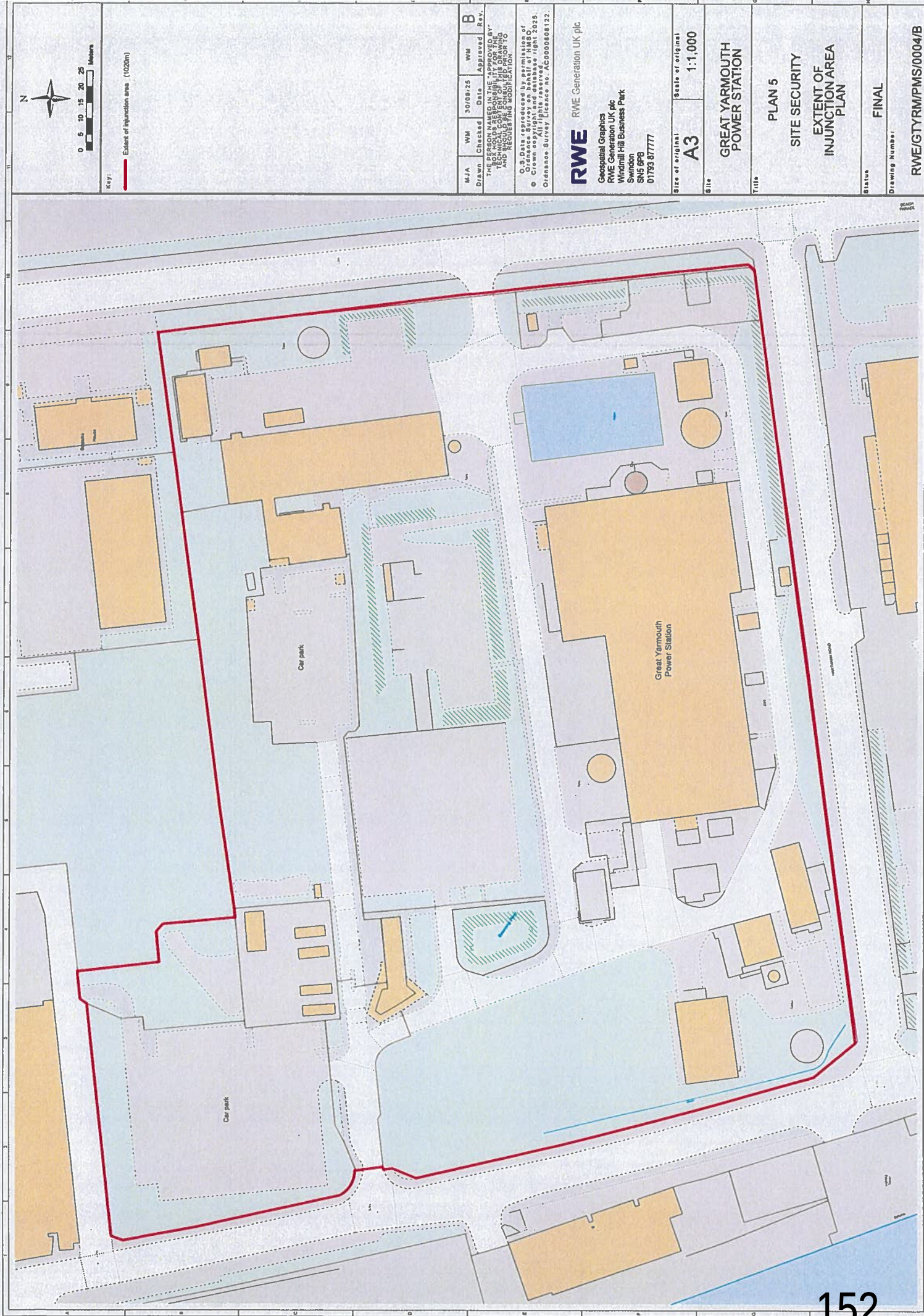
PEMBROKE POWER STATION

PLAN 3
SITE SECURITY
EXTENT OF
INJUNCTION AREA
PLAN

Status	Drawing Number
FINAL	

RWE/PMBRK/PMS/0031/B





Key: Extent of injunction area (100m)

MJA	WM	30/09/25	WM	B
Drawn	Checked	Date	Approved	Rev.
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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	Drawing Number
FINAL	RWE/GTYRM/PMS/0004/B

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.

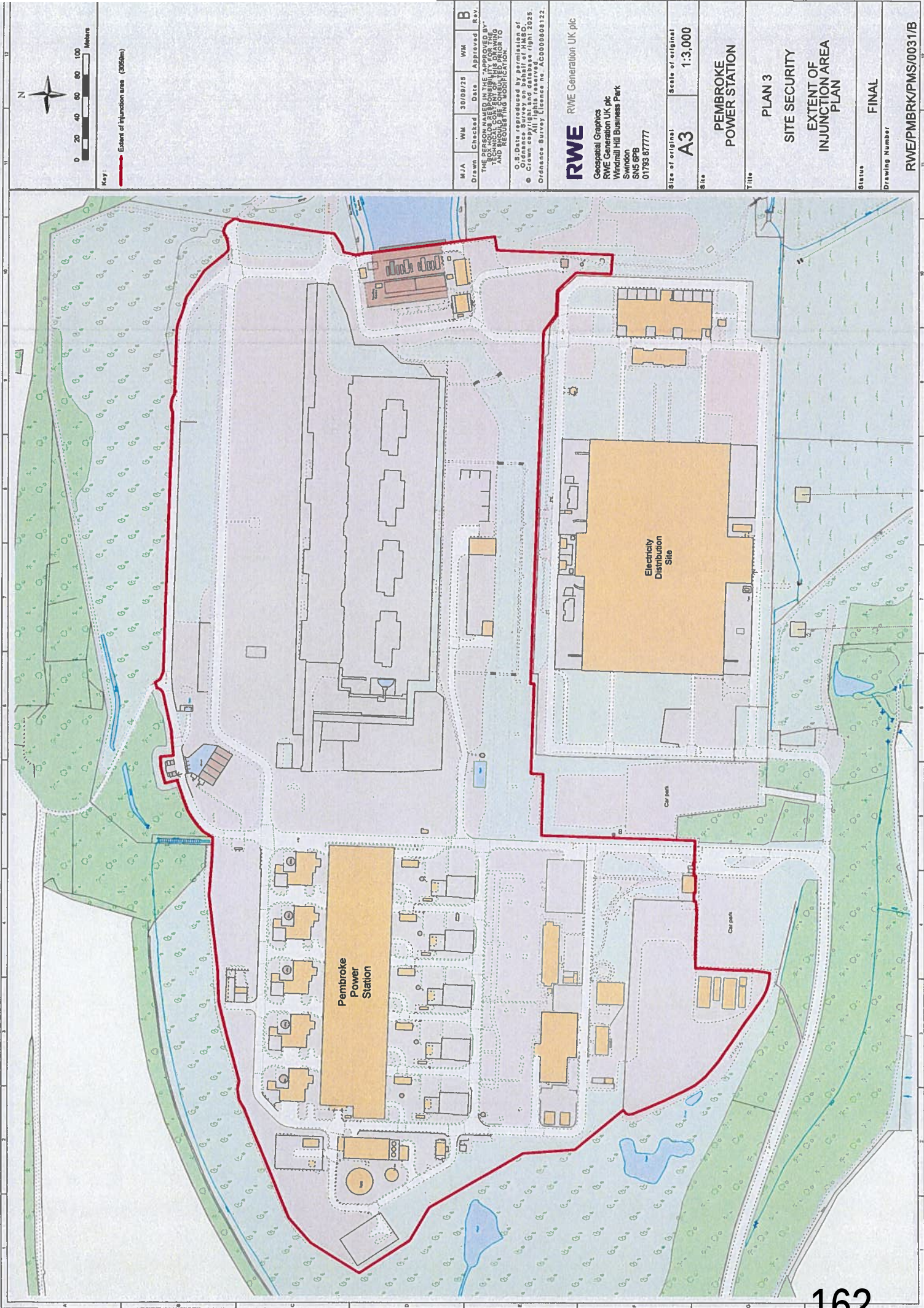
Dated: 24 Oct 2025

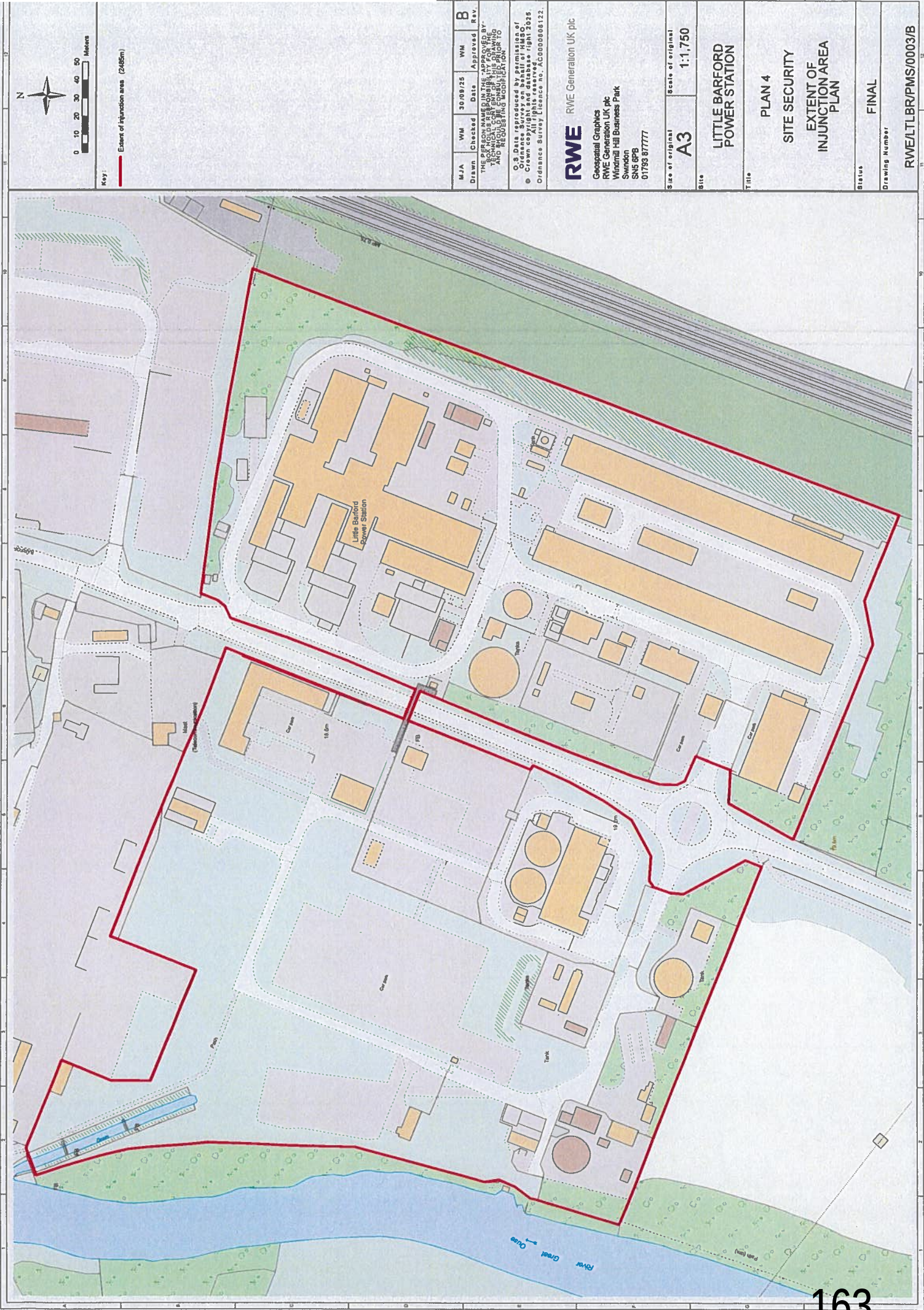
Judge: Helen Goss

SCHEDULE 1: PLANS 1-6

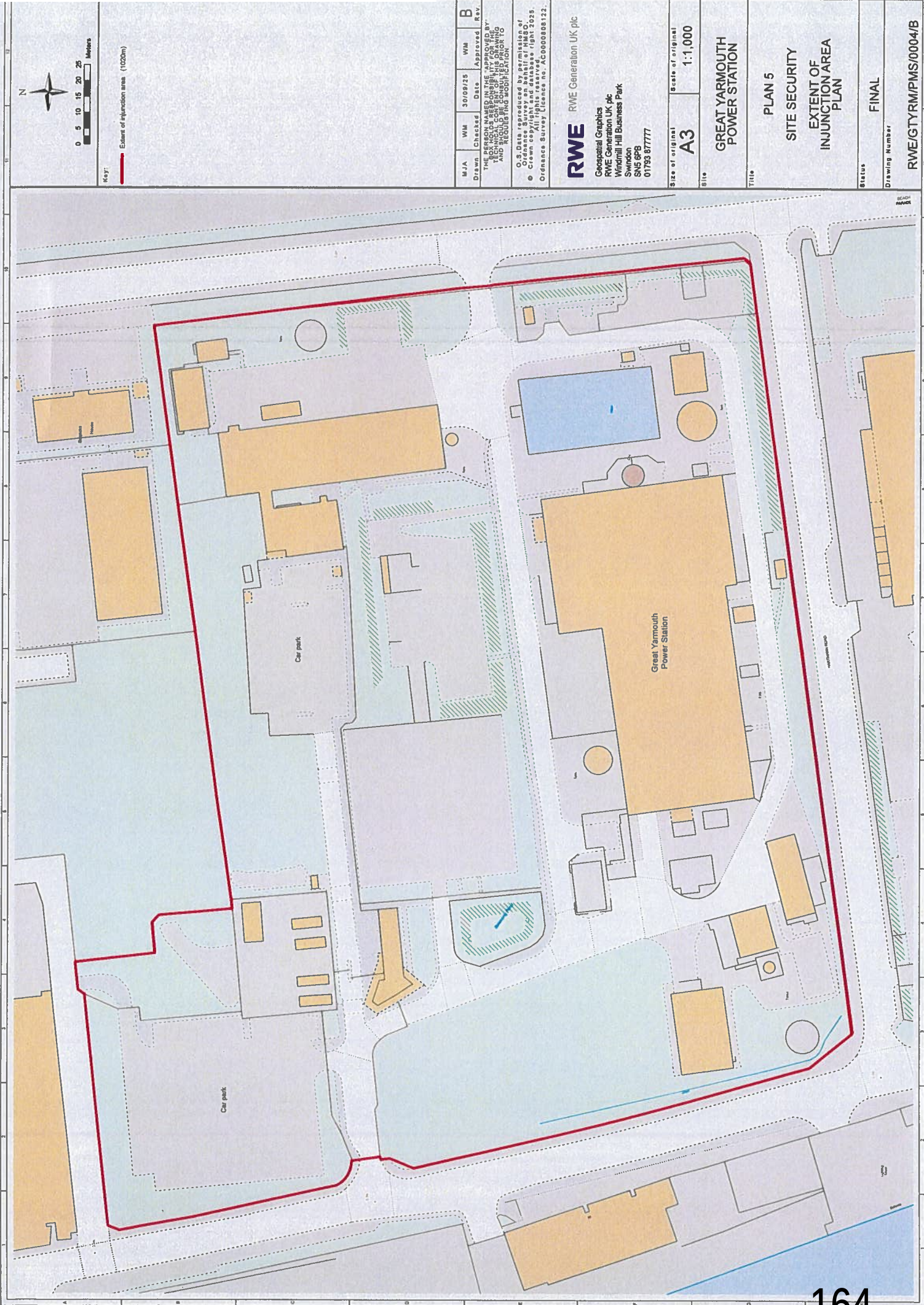








MJA	WM	30/09/25	WM	Approved	Rev.
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RWE RWE Generation UK plc Geospatial Graphics RWE Generation UK plc Windmill Hill Business Park Swindon SN4 6PB 01793 877777					
Size of original	A3	Scale of original	1:1,750		
Site	LITTLE BARFORD POWER STATION				
Title	PLAN 4 SITE SECURITY EXTENT OF INJUNCTION AREA PLAN				
Status	FINAL				
Drawing Number	RWE/TLBR/PMS/0003/B				



WJA	WM	30/08/25	WM	B
Drawn	Checked	Date	Approved	Rev.
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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/GTYRM/PMS/0004/B



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

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Osborne Clarke LLP is part of an international legal practice.

- 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 injunctions@osborneclarke.com