



Claim Form (CPR Part 8)

In the High Court of Justice
Business & Property Courts

Claim no.

Fee Account no.

PBA0080086

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

H W F -



18 Aug 2025

PT-2025-000853

Claimant

Electric Glass Fiber UK LTD
Leigh Road
Hindley Green
Wigan
WN2 4XG



Defendant(s)

Persons Unknown who without the permission of the Claimant enter or remain on the land registered at HM Land Registry under title numbers GM459851 and GM459852 as marked red on the plan at Schedule 1 to the Claim Form.

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

Details of claim (see also overleaf)

The Claimant and the Property

1. The Claimant, Electric Glass Fiber UK, Ltd. is a private limited company incorporated on 8 July 2016 and registered in England and Wales under company no. 10269432. The Claimant's registered address is Leigh Road, Hindley Green, Wigan WN2 4XG. The Claimant's business is the manufacturing of glass fibres for use in car and wind turbines.

2. The Claimant holds:

a. the freehold title to land and buildings on the west side of Leigh Road, Hindley, Wigan as registered at HM Land Registry under title no. GM459851; and

b. the long-leasehold title to land on the west side of Leigh Road, Hindley, Wigan as registered at HM Land Registry under title no. GM59825.

which are collectively referred to as the 'Property' in this Claim.

Defendant's
name and
address

Persons Unknown

£

Court fee	646.00
Legal representative's costs	TBC
Issue date	

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

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

Details of claim (continued)

3. Title number GM459851 is subject to two leases that are carved out of the Applicant's freehold title, as noted on the official copy entry and title plan. Those leases are:

a. an electricity substation lease, granted on 21 August 2002 for a term of 99 years from 21 August 2002, and which is registered at HM Land Registry under title number GM909490; and

b. the lease of a small parcel of the land, granted on 25 January 2023 for the term 1 April 2019 to 1 March 2033, and which is registered at HM Land Registry under title number MAN415654. This lease is granted to Air Products PLC, with the relevant land housing an oxygen production facility, the product of which was used in the Claimant's manufacturing processes.

4. The Property is an industrial site and comprises approximately 100 acres. Until 26 June 2025, the Claimant conducted its business at the Property. On 26 June 2025, manufacturing operations at the Property were discontinued, and the Property is in the process of being decommissioned. At the date of this Claim, the removal of high-risk materials from the Property is underway, which includes hazardous substances and chemicals.

Relief sought

5. The Claimant seeks injunctive relief to restrain acts of trespass at the Property. The relief is sought both on a precautionary basis, and in response to acts of trespass that have already occurred.

6. The relief is sought against a defined category of newcomer Persons Unknown. It has not been possible to identify those who have already trespassed on the Property, save that they appear to be members of the Gypsy and Traveller community. Further, it is impossible for the Claimant to identify all those who may attend the Property and commit acts of trespass.

7. As against newcomer Persons Unknown, the injunctive relief is technically always sought and granted on a without notice basis (*Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* [2024] 2 WLR 45 ('Wolverhampton') at [139], [142] and [143(ii)]).

8. In accordance with the Wolverhampton principles, the relief is sought on a time-limited basis (6 months), subject to continuation on review if appropriate.

9. The Claimant apprehends further imminent acts of trespass at the Property and seeks injunctive relief accordingly.

Acts of trespass

10. To date, the Claimant has experience three acts of trespass at the Property: 25 July 2025, 9 August 2025 and 10 August 2025, all as detailed in the first witness statement of Teun Bakker. Those acts of trespass have been aggravated and involved acts of violence, property damage and attempted theft from the Property.

AND the Claimant claims:

- (1) the injunctive relief set out in the draft injunction order;
- (2) the alternative service order set out in the draft injunction order; and
- (3) further or other relief as the court thinks fit.

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

Statement of Truth

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

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

Signature



- Claimant
- Litigation friend (where claimant is a child or a Protected Party)
- Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
18	08	2025

Full name

Helen Jayne Evans

Name of claimant's legal representative's firm

Hill Dickinson LLP

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

Partner

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SCHEDULE 1 - PLAN

