

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

B E T W E E N :

ELECTRIC GLASS FIBER UK, LTD.

Claimant

-and-

**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 IN RED ON
THE PLAN AT SCHEDULE 1 TO THE CLAIM FORM**

Defendants

FIRST WITNESS STATEMENT OF STEPHEN LEACH

I, **Stephen Leach**, of Leigh Road, Hindley Green, Wigan WN2 4XG will say as follows:

1. I am the Site Manager of the Claimant's site situated at Leigh Road, Hindley Green, Wigan WN2 4XG (and referred to as the '**Site**' in this witness statement). I am employed by the Claimant and have worked at the Site for 36 years. I am duly authorised to make this witness statement on behalf of the Claimant.
2. I make this witness statement in support of the Claimant's Application for the continuation of the injunction order dated 19 August 2025 (the '**Injunction**') for a further 12 months. The Injunction is currently due to expire at 23:59hrs on 18 February 2026. This Application is made pursuant to paragraph 6 of the Injunction.
3. This witness statement has been prepared following an exchange of emails and a video conference with the Claimant's legal advisers. The facts and matters set out by me in this witness statement are within my own knowledge unless otherwise stated, and I believe

them to be true. Where I refer to information provided to me by others, the source of that information is identified. The facts and matters derived from other sources are true to the best of my knowledge and belief.

4. There is now shown to me a paginated bundle of documents marked **SL1**. Where I refer to that bundle of documents, I do so in the format **SL1/page number**.

BACKGROUND

5. As was set out in the Claim, the Claimant is the registered proprietor of a significant industrial site in Wigan (the ‘**Site**’), which comprises two land titles: GM459851 (freehold) and GM459852 (long-leasehold). The Site is the largest fibre glass factory in the UK, and spans approximately 100 acres. Manufacturing operations were discontinued at the Site in June 2025, and the Site is in the process being decommissioned, which includes the safe removal of all materials from the Site (including hazardous materials), demolition of the two glass furnaces, removal of the electrical infrastructure from the field to the substation and the recovery of metal for scrap through a formal waste tender process. As was explained in the Claim, the hazardous materials on Site have included burnt lime, various acids and flammable binder chemicals. The site also houses a radiation emitting x-ray machine and various high-voltage substations, and asbestos has been identified at the Site.
6. Put simply, unauthorised access to the Site poses a significant safety risk, and there is a risk of serious injury or even death if unauthorised persons who do not know of or understand these risks and how to manage them access the Site.
7. On 19 August 2025, the court granted the Injunction, a copy of which I exhibit at **SL1/2**. The Injunction was time limited, and captured a defined category of newcomer Persons Unknown. Paragraph 2 of the Injunction prohibits trespass generally, with specific acts of trespass that are prohibited also being set out in the Order.
8. The relief was sought on an urgent basis as the Site had experienced several instances of aggravated trespass shortly before the Claim and Application for relief was made. Those acts of trespass were accompanied by acts of violence, aggression and attempted thefts

from the Site. At that time, it was understood that the acts of trespass had been committed by members of the Gypsy and Traveller community.

9. Rather than repeat the background in full, I respectfully refer the court to the first witness statement of Teun Bakker dated 18 August 2025 and the exhibits thereto, which can be found at **SL1/8**.

SUMMARY OF EVENTS SINCE THE GRANT OF THE INJUNCTION

Continued interest in the Site

10. Since the grant of the Injunction, the Site has continued to attract interest from third-parties. The nature of the trespasses now appears to be more varied, with so-called urban explorers having entered the Site on at least two occasions. If the Injunction was to expire, and that deterrent was lost, I am certain that there would be more incidents of trespass. I am however at a disadvantage, as I cannot prove a negative and say with any certainty just how many potential trespassers have been deterred from trespassing because of the Injunction; that is not within my knowledge.
11. On average, I estimate that the staff of the security contractor engaged to secure the Site (Sector Security Services Limited) alert me three times a week by WhatsApp to incidents in which unknown persons arrive at the main gate to the Site in vehicles. I am informed by the security contractor that these unknown persons tend to enquire with the security guards about what time they will finish work, and they show a general interest in the Site and its surroundings and security arrangements. I am also informed that many of these visitors obscure the number plates on their vehicles, or have been using false number plates (the security staff use the GOV.UK online platform to check MOT status, and in some cases have discovered that a different make and model of vehicle is associated with that registration), limiting the ability to identify them through this information. I strongly suspect that these unknown persons are undertaking reconnaissance and scoping out the Site and the security arrangements, with a view to committing trespass. The most recent example of such an incident occurred on the evening of 27 January 2026.

12. The security staff also inform me that drones are regularly flown over the Site, and caravans are often seen passing through the area around the time that drone flights are observed. Again, I strongly suspect that the drone flights are acts of surveillance by those who are considering trespass; they may be monitoring the movement of the security staff and/or observing the Site to identify the location of assets and materials that they are interested in taking.
13. I am also informed by the security staff that other industrial sites of a similar nature to the Site have also now become frequent targets for groups from the Gypsy and Traveller community, especially in the neighbouring area of Bury, and a specific example includes the former Bakkavor Meals factory site in Ince-in-Makerfield in Wigan. Those sites are also being targeted for the purposes of theft of materials such as copper wiring.

Progress of the de-commissioning

14. I am overseeing the decommissioning of the Site.
15. The decommissioning of the Site is still a work in progress. Some hazardous chemicals remain on Site, and the process of their removal is due to be completed by the end of February 2026 (although this date may be pushed back, as it has been before). Further, one radiation emitting source remains on Site (that being the x-ray machine). The lead time for the removal of the x-ray machine is currently 16 weeks.
16. The high voltage cabling servicing the substations remains on site, and will do for the foreseeable future.
17. Some assets and materials have been removed from the Site. However, a significant amount still remains (far more remains than has already been removed). These assets include metals such as copper, stainless steel, mild steel and aluminium.
18. The social media content posted by Abandoned UK and Urbex Lost & Found, which I shall reference below, captures images of some of the machinery and other assets that remain on the Site.

19. I understand from my superiors that, in the insolvency process, the Site may be sold. I am unable to give any specific details about the arrangements, progress and timeline relating to the disposal, that not being within my knowledge. However, I do understand from my superiors that a target date of April 2026 is being discussed.

SPECIFIC INCIDENTS OF TRESPASS

20. I have reviewed my record of incidents that have occurred at the Site since the grant of the Injunction on 19 August 2025, and set out below the details of some key incidents, as they appear in my record.

August 2025 Bank Holiday Weekend

21. On the evening of 22 August 2025, there was a very aggressive confrontation at the Site involving members of the Gypsy and Traveller community who were seeking to gain access to the Site. In the altercation, a dog handler from the Site's security team was bitten by one of the trespasser's dogs.

22. Security staff were able to contain the incursion at the gatehouse, and police officers attended the Site to assist. However, the incident remained ongoing, and on 23 August a member of the security staff was injured and needed medical treatment for significant head injuries that he suffered from multiple blows to the head during the course of the altercation.

23. The trespassers eventually left the Site later on 23 August 2025.

28 August 2025

24. Two males gained access to the Site and were observed using angle grinders in an attempt to remove cabling from the Site. The individuals fled the Site when challenged by security guards and K9 units.

September 2025

25. On 9 September, the police attended the Site and arrested two males found on the Site on suspicion of burglary.

26. On 17 September, several attempts to gain access to the Site were made. The police attended the Site to support the security staff at the Site.

October 2025

27. On 4 October, approximately 25 caravans and associated vehicles (which had previously been located in the ASDA car park in Leigh) attempted to access the Site. The security staff at the Site were able to prevent the incursion, and the group moved on.

28. On 17 October, two unknown males were found on the Site; they left after being challenged by security staff and K9 units.

29. On 31 October, three caravans and associated vehicles arrived at a road entrance to the Site; they were unable to gain access.

November 2025

30. On 1 November, two caravans and associated vehicles arrived at the same road entrance to the Site as was targeted on 31 October; again, they were unable to gain access.

31. On 14 November, three unknown males were detected on the Site; they left the Site when security staff and K9 units attended.

17 November 2025: Abandoned UK

32. Abandoned UK appears to be an urban explorer group. At the date of this witness statement, the group's Facebook page has 248,000 followers and has made 3,100 posts, and its YouTube channel has 13,300 subscribers and has posted 324 videos.

33. On 18 November 2025, a video of 27:20 mins duration was posted to the YouTube channel. However, the Claimant has identified from its own sources that the incursion happened on

17 November. The video is entitled “*Nippon Electric Glass Fiber this was a risky explore*”. That video captures two males entering the Site, and making their way around the Site. At the outset of the video, the male capturing the footage can be heard to narrate “*welcome back to another video, today it’s just me and Josh*” and that they were going to “*explore this company that closed down at the start of the year*”. Shortly afterwards, and once they have entered the Site, the narrator then says “*we’ve made it this far but couldn’t show half of it ‘cos security is everywhere there is about four to five dog units on site all with dogs as well constantly moving every ten to twenty minutes*”, he then describes the endeavour as “*sketchy*”. The video then proceeds to capture the males’ exploration through the Site, and they can be seen climbing on buildings and equipment, and in the roof of the building, and walking through the buildings on site. The males proceed to touch and handle many items on site. They also access offices on the Site. At the date of this witness statement, the video has 2398 views.

34. In the interests of proportionality, I do not exhibit the video, but it can be found here: <https://www.youtube.com/watch?v=acNXFkfXjc8>.

35. On 24 November 2025, a post was made to the Abandoned UK Facebook page, which included 57 photographs taken from inside the Site and various buildings on the Site. I exhibit a copy of the post and a sample of the photographs at **SL1/53**. The post states, amongst other things “*wow, talk about high security presence*” and “[*t*]here were 6/7 dog units on site. It was a stealthy mission trying to get in without the dogs knowing or getting caught by the guards whilst they were driving about”. A link to the YouTube video was provided in the comments to the post.

36. When the YouTube and Facebook content came to the Claimant’s attention, the Claimant’s solicitors wrote to Abandoned UK by way of a Facebook message (that being the only available contact details) on 8 December 2025 to advise of the Injunction and request that the Facebook and YouTube content (and any other social media content) was removed. The letter makes clear that the Claimant is concerned that the content may encourage others to engage in similar acts, which may put them at risk of harm and at risk of breaching the Injunction. I exhibit a copy of the letter at **SL1/60**. No response has been received to this letter, and the content remains available to view on both Facebook and YouTube.

37. The Claimant remains concerned that the available content may encourage other urban explorers to attend the Site. Further, as the content shows what is inside the Site by way of plant, machinery and other assets, the Claimant is concerned that it effectively ‘advertises’ what is on the Site and may encourage further criminal groups who wish to remove items from the Site, as was experienced in the summer of 2025.

18 November 2025: Urbex Lost & Found

38. On 18 November 2025 another team of urban explorers entered the Site. The security staff and K9 units detected their presence, and challenged the trespassers, upon which the trespassers left the Site swiftly and before the attendance of the police. I have (but have not exhibited in the interests of proportionality) CCTV footage of the trespassers making themselves a cup of tea and helping themselves to crisps when they were on the Site prior to be challenged by the security staff. The photographs taken by the trespassers during the course of their trespass were published to the Facebook page of Urbex Lost & Found (**‘Urbex’**).

39. Urbex appears to be another urban explorer group. At the date of this witness statement, the group’s Facebook page has 301,000 followers and has made 3,800 posts.

40. On 8 December 2025, a post was made to the group’s Facebook page with 26 photographs taken from inside the Site and various buildings inside. The text accompanying the post states, amongst other things “[t]his was a mission to get in”. I exhibit a copy of the post and a sample of the accompanying photographs at **SL1/62**.

41. Under the ‘contact details’ field of the Facebook page, the following linked details appear: ‘johnsonian175’. Following that link takes you to an Instagram account of an ‘Ian Johnson’. The account only contains six posts. It is not clear to me what relationship Mr Johnson has with Urbex, or whether he was responsible for capturing the content for the 8 December 2025 post.

42. When the YouTube and Facebook content came to the Claimant’s attention, the Claimant’s solicitors also wrote to Urbex by way of a Facebook message (that being the only available contact details) on 24 December 2025 to advise of the Injunction and request that the

Facebook and YouTube content (and any other social media content) was removed. The letter again makes clear that the Claimant is concerned that the content may encourage others to engage in similar acts, which may put them at risk of harm and at risk of breaching the Injunction. I exhibit a copy of the letter at **SL1/67**.

43. A response was received at 17:39 that same day, which I exhibit at **SL1/69**. The response simply reads “[n]o worries we won’t be going back I add this to the list off them I’ve got”. I understand this message to mean that Urbex have noted the Injunction, and added the Site to a list that it keeps of sites protected by injunctions, and that the group will not be re-attending the Site as a consequence of the Injunction. Without waiving privilege, I understand from the Claimant’s legal advisers that restraining urban explorers is a common use of the newcomer persons unknown injunction.

44. The content remains available to view on both Facebook and YouTube. The Claimant remains concerned that this may encourage other urban explorers to attend the Site. Further, as the content shows what is inside the Site by way of plant, machinery and other assets, the Claimant is concerned that it effectively ‘advertises’ what is on the Site and may encourage further criminal groups who wish to remove items from the Site, as was experienced in the summer of 2025.

December 2025

45. On 6 December, two unknown persons accessed the Site from neighbouring industrial units.

Arrested persons

46. As I have mentioned above, Greater Manchester Police have assisted the security staff at the Site on several occasions, and have also made arrests (I was also informed by the police on 5 January 2026 that an arrestee was further arrested for alternative offences in relation to the relevant incident at the Site). I do not know the identities of the arrested persons, but my understanding from my conversations with the officers at Greater Manchester Police is that none of the arrestees have been identified at the Site on multiple occasions (ie. they are all one-time offenders in relation to the Site).

SECURITY ARRANGEMENTS AT THE SITE

47. The Claimant does not just rely on the Injunction to protect the Site from trespassers. Mr Bakker's witness statement dated 18 August 2025 detailed the extensive additional security arrangements that have been put in place at the Site to guard against trespassers; these included additional security staff and K9 units, and physical measures such as dragon's teeth and additional the installation of large obstacles to prevent larger vehicles entering the Site.
48. The Claimant has continued to reinforce its security measures at the Site following the grant of the Injunction. For example, I directed that a trench should be dug to obstruct access to the Site; this happened on 3 September 2025 at a cost of £24,000. I have also replaced 160m of chain-link fencing at the Site. Further, I sourced and procured the installation and commissioning of a hydraulic gate, also on 3 September. The gate has been installed on the perimeter road inside the Site, between the main gate and the security lodge. The gate can be closed in four seconds, and is intended to slow down any intruder, giving time for the security staff to call the police and get additional support to manage the incident. Having reviewed my purchase orders, I calculate that the gate cost at £15,500 to buy, install and commission.
49. I have also reviewed my purchase orders for the security contractor, and confirm the following:
- i. for the period 29 September 2025 and 31 March 2026, the ordinary security cost for security staff at the gatehouse is in the sum of £89,883.36. These costs would have been incurred in the ordinary course of business, and are not an additional expense;
 - ii. for the period 29 September 2025 and 31 March 2026, the cost of additional security staff at the gatehouse, and which is required only because of the incidents of trespass, is in the sum of £577,661.76;
 - iii. for the period 20 November 2025 to 24 December 2025, additional costs in the sum of £28,752.98 were incurred. These costs relate to the additional security staff that

were engaged to patrol inside the buildings after the incidents of trespass by the urban explorers; and

- iv. for the period 5 December 2025 to 5 January 2026, additional costs in the sum of £8,847.07 were incurred to engage further K9 units to patrol the Site.

50. I continue to have a good relationship with Greater Manchester Police, and they provide assistance wherever possible. However, their assistance is mostly in response to an incident, rather than as a preventative measure.

CONCLUSION

51. The Site continues to attract interest from trespassers (both those who appear to have an interest in removing materials from the Site, and those engaged in so-called urban exploring). The Site remains unsafe for trespassers, and continues to house valuable assets and materials that attract the attention of thieves, as the decommissioning process is ongoing. There is a real and imminent risk of further trespasses being committed, and if the Injunction were to expire, I am strongly of the view that the incidents of trespass will increase in frequency.

STATEMENT OF TRUTH

I believe that the facts set out in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:



Stephen Leach
28 January 2026