IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles 12 July 2024

BETWEEN:

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL



-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

(223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

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(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

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(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

Defendants

ORDER

PENAL NOTICE

IF YOU, PERSONS UNKNOWN, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

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POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST ATTACHED AT SCHEDULE 2 OF THIS ORDER FOR BREACH OF PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006. ANY PERSON CAUGHT BREACHING PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER MAY BE ARRESTED AND BROUGHT BEFORE THE COURT

UPON the review of the injunction Order granted by Foster J and dated 26 January 2023 insofar as it applies to Persons Unknown (only)

AND UPON hearing Caroline Bolton and Natalie Pratt of counsel and no person appearing for or on behalf of the Defendants

IT IS ORDERED THAT:

Definitions

- 1. For the purpose of this Order:
 - 1.1 "The Roads" shall mean the Roads identified in Annexe 1 to this Order and to the Claim Form as marked in red on the maps at Annexes 2 and 3 to this Order and to the Claim Form.
 - 1.2 "The Administrative Area of Thurrock" shall mean the administrative area as marked with the purple line on the map at Annexe 2 to this Order and to the Claim Form.
 - 1.3 "The Administrative Area of Essex" shall mean the administrative area as marked with the pink line on the map at Annexe 3 to this Order and to the Claim Form.
 - 1.4 "The Administrative areas of Thurrock and Essex" shall mean those areas in 1.2 and 1.3 above.
 - 1.5 "The Fuel Terminals" shall refer to the following four sites collectively:
 - 1.5.1 The Navigator Fuel Terminal, Oliver Road, West Thurrock RM20 3ED;
 - 1.5.2 The Esso Fuel Terminal, London Road, Purfleet RM19 1RS;
 - 1.5.3 Exolum Storage Ltd, off Askews Farm Lane, London Road, Grays RM17 5YZ; and
 - 1.5.4 Oikos Storage Limited, Haven Road, Hole Haven Wharf, Canvey Island, Essex SS8 0NR.

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INJUNCTION

Prohibitions

- Until and including 12 July 2029, and subject to paragraph 6 below, the 223rd to 229th Defendants (Persons Unknown) (whether by themselves or by instructing, encouraging or allowing any other person) are <u>forbidden</u> from:
 - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off **the Roads** for the purpose of protesting.
 - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with **access to or from the Roads**, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
 - 2.3 Entering, climbing onto, climbing into, climbing under **any vehicle** travelling on to, off or along **the Roads** or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
 - 2.4 Entering, climbing onto, climbing into, climbing under **any vehicle** on any **adjacent roads, slip roads or roundabouts to the Roads,** whether or not those roads are vested in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
 - 2.5 **Affixing themselves** ("locking on") to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.
 - 2.6 Affixing themselves ("locking on") to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the "locking on" is for the purpose of protesting.
 - 2.7 Affixing themselves ("locking on") or any other items to any of the Roads or any other person or object on, under or over the Roads.
 - 2.8 Affixing themselves ("locking on") or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the "locking on" is for the purpose of protesting.
 - 2.9 **Erecting any structure** on the Roads.
 - 2.10 **Tunnelling**, excavating, drilling or digging under or adjacent to the Roads.
 - 2.11 **Occupying** existing tunnels under the Roads for the purpose of protesting.
 - 2.12 **Causing damage** to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.

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- 2.13 **Abandoning any vehicle** or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.
- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to **any petrol station** in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any **petrol station forecourt or access road**, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by **delivery tankers of fuel supplies** and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.
- 2.17 **Causing, assisting** or encouraging any other person to do any act prohibited by paragraphs 2.1 to 2.16 above.
- 2.18 **Continuing any acts** prohibited by paragraphs 2.1 to 2.16 above.

Power of arrest

3. Pursuant to s.27 Police and Justice Act 2006, a power of arrest shall apply to paragraphs 2.1 to 2.16 above in the form attached at Schedule 2 of this Order.

Alternative service

- 4. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission to serve the **223rd to 229th Defendants (Persons Unknown)** with this Order, the power of arrest and any further documents in the Claim by (4.1 4.3 to be treated conjunctively):
 - 4.1 **Websites:** placing a copy of the documents to be served on the Claimants' websites and Facebook pages; and
 - 4.2 Email: sending a copy of the documents to be served to Just Stop Oil, Youth Climate Swarm, Extinction Rebellion and Insulate Britain at the following email addresses: <u>juststopoilpress@protonmail.com;</u> <u>youthclimateswarm@protonmail.com</u>; <u>insulatebritainpress@protonmail.com</u>

and providing a web link at which they can access the documents to be served; and

4.3 **Placing signs:** on A-Road entry points and exit points to the administrative area of Thurrock, and within 50 metres of The Fuel Terminals and on the A130 and B1014 between the entrance to Canvey Island and the roundabout known as the Waterside Road roundabout on Canvey Island, stating that there is a High Court

Injunction in place prohibiting protest on the highway and providing a web link and QR code at which the documents to be served can be found.

5. The **deemed date of service** of any documents referred to in paragraph 4 above shall be the day on which service of the document or documents is completed in accordance with paragraph 4 above.

Review of this Order

6. The Order against the **223rd to 229th Defendants (Persons Unknown)** shall be reviewed at a hearing no later than **11 July 2025** (and as near to that date as the court can reasonably accommodate), with a time estimate of one day, unless the Claimants indicate to the Court that they do not seek an extension of the Order, upon which the Order will expire. The Claimants must file and serve in accordance with paragraph 4 above any evidence upon which they intend to rely at the review hearing by 4pm on 27 June 2025. Any other person who would like to participate in the review hearing must also file and serve on the Claimants any evidence upon which they intend to rely at the review hearing by 4pm on 27 June 2025.

Liberty to apply

- 7. The Defendants or any other person affected by this order may apply to the Court at any time to vary or discharge it, but if they wish to do so they must inform the Claimants' solicitors at the same time as the application is filed at court (and in any event not less than 48 hours before the hearing of any such application, not to include weekends or public holidays).
- 8. Any person applying to vary or discharge this order must provide their full name and address for service.

Costs

9. No order as to costs.

GUIDANCE NOTES

Effect of this Order - the Defendants

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

Interpretation of this Order

2. In this Order references to 'the Defendant' means any or all of them (unless expressly stated otherwise).

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- 3. A requirement to serve on 'Defendant' means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
- 4. An Order requiring 'the Defendant' not to do anything applies to all Defendants.
- 5. This Order contains the following schedules and annexes
 - (i) Schedule A-Witness Statements;
 - (ii) Schedule 1-List of Named Defendants;
 - (iii) Schedule 2-The Power of Arrest;
 - (iv) Annexe 1-The List of "The Roads" in Thurrock;
 - (v) Annexe 2-The map of the Administrative Area of Thurrock; and
 - (vi) Annexe 3-The map of the Administrative Area of Essex.

Communications with the Court

 All communications with the Court about this Order should be sent to Room E03, The Royal Courts of Justice, Strand, London, WC2A 2LL. The telephone number is 020 3938957. The offices are open between 10am and 4pm Monday to Friday.

SCHEDULE A-WITNESS STATEMENTS

- 1. The Court read the following witness statements filed on behalf of the Claimants:
 - (a) The witness statement of Adewale Adesina 23.4.2022;
 - (b) The witness statement of Morgan Cronin 23.4.2022;
 - (c) The witness statement of Paul Crick 23.4.2022;
 - (d) The first witness statement of Adam Rulewski 24.4.2022;
 - (e) The second witness statement of Adam Rulewski dated 11.5.2022;
 - (f) The third witness statement of Adam Rulewski dated 16.5.2022;
 - (g) The fourth witness statement of Adam Rulewski dated 25.1.2023;
 - (h) The second witness statement of Adewale Adesina 20.3.2024;
 - (i) The witness statement of Stephen Jennings 23.3.2024;
 - (j) The third witness statement of Adewale Adesina 26.6.2024;
 - (k) The fifth witness statement of Adam Rulewski 11.7.2024.

SCHEDULE 1 – NAMED DEFENDANTS

1. Madeline Adams

2. Mary Adams

3. David Addy

4. Amber Alexandar

5. Mina-Mae Alexander

6. Eric Anderson

7. Christine Aslett

8. Nicholas Aslett

9. Lachlan Ayles

10. Stephanie Aylett

11. Pete Bailey

12. William Bajwa

13. Jeremy Banks

14. Colin Barrington

15. Kai Bartlett

16. Joshua Bates

17. Christopher Bennett

18. Gillian Bird

19. John Blanco

20. John Blewett

21. Poppy Bliss

22. Hilary Bond

23. Trevor Boulden

24. Geoffroy Bowman

25. Simon Bramwell26. Joseph Bream

27. Scott Breen

28. Stephen Brett

29. Emily Brocklebank

30. Claire Brook

31. Emma Brooker

32. Michael Brown

33. Judith Bruce

34. Madeleine Budd

35. Tes Burns

36. Benjamin Buse

37. Catherine Cannon

38. Rebecca Cassar

39. Jessica Causby

40. Susan Chamberlayne

41. Sally Chapman

42. Vishal Chauhan

43. Katherine Chesterman

44. Phillipa Clarke

45. Oliver Clegg

46. Orla Coghlan

47. John Coghlan

48. Ruth Cook

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49. Heather Cooper 50. Jasmine Corkhill Harris 51. Joy Susan Corrigan 52. Richard Crane 53. David Crawford 54. Rosemary Croft 55. Joseph Daldorph 56. Beverley Ann Daniel 57. Ben Delap 58. Gaie Delap 59. Gabriella Ditton 60. Igors Djomins 61. Laura Doehlei 62. Marguerite Doubleday 63. Ella Eason 64. Christine Essex 65. Janet Flynn 66. Michael Forton 67. Phoebe Frewer 68. Amy Friel 69. Robin Gardner 70. Cressida Gething 71. Alasdair Gibson 72. Hugo Glashier 73. Stephanie Golder 74. William Goldring 75. Xavier Gonzalez Trimmer 76. Alfie Goodland 77. Emma-Rose Goodwin 78. Sophie Greenland 79. Aaron Gunning 80. Louisa Hadden 81. Catherine Hallett 82. Finn Halsall 83. Jake Handling 84. Gareth Harper 85. Louise Harris 86. Patrick Hart 87. Yvonne Hayward 88. Selma Heimedinger 89. Jonathan Herbert 90. Noah Herfort 91. Suzanne Hetherington 92. Sarah Hirons 93. Rupert Horlick 94. Adrian Howlett 95. Eric Hoyland 96. Abigail Hubbucks 97. Hannah Hunt 98. Emma Ireland

99. Pavel	lvanov
100.	Rik Jansen
101.	Ruth Jarman
102.	Stephen Jarvis
102.	Russell Jarvis
103.	John Johnson
101.	Hannah Johnston
105.	Timothy Jones
107.	Pascale Kann
107.	Hallum Kelly
109.	Linda Latter
110.	Charles Laurie
111.	Peter Lay
111.	Eben Lazarus
112.	Isobel Lewis
113.	Elanor Lewis-Holmes
115.	Joseph Linheart
116.	El Litten
117.	Rebecca Lockyer
118.	Felix Lozano
119.	Barbara Lund
120.	Jacqueline Macey
121.	Catharine Maclean
122.	Jacob Main
123.	Elizabeth McCormack
124.	Eilidh McFadden
125.	Nathan McGovern
126.	Louis McKechnie
127.	Lilah McKim
128.	Grace McMeekin
129.	Adalaide Meaney
130.	Anna Middleton
131.	Hannah Miles
132.	Benjamin Mitchell
133.	Darcy Mitchell
134.	Deborah Mitchell
135.	Teddy Monroe
136.	Fiona Moore
137.	Stefania Morosi
138.	Paul Morozzo
139.	Virgenia Morris
140.	Paul Morrison
141.	Zak Mullen
142.	Alexandra Mulvey
143.	Reuben Mychaleckyj
144.	Richard Newell-Price
145.	Ben Newman
146.	Alexander Newnham
147.	Jessica Norgard
148.	Rachel Norris

149.	Rose Norris
150.	George Oakenfold
151.	Nicholas Onley
152.	Jakub Pabiniak
153.	Ella-Rose Paez
154.	Sophie Page-Hall
155.	Susan Parfitt
156.	Dillon Parsons
157.	Rose Patterson
158.	Ethan Paul
159.	Rosalind Pears
160.	Abigail Percy-Ratcliff
161.	Ursula Pethick
162.	Jacqueline Phillips
163.	Mitchel Phillips-White
164.	Robert Possnett
165.	Matthew Powell
166.	Emily Price
167.	Robert Price
168.	Amy Pritchard
169.	Felix Reeves-Whymark
170.	Anna Retallack
170.	Anne Richards
172.	Bethan Roberts
172.	Jasmin Robertson
175.	Sebastian Roblyn
174.	Isabel Rock
175.	Elizabeth Rosser
177.	Christian Rowe
178.	Finn Roweth
179.	Adelheid Russenberger
180.	Isla Sandford
181.	Daniel Sargison
182.	James Sargison
182.	Cat Scothorne
185.	James Sebley
185.	Rosa Sharkey
185.	Sophie Sharples
180.	
187.	Susan Sidey James Skeet
188.	Hannah Skwarska
189.	
	Jacqueline Slade
191.	Oliver Slaughter
192.	David Smartknight
193.	Heather Smith
194.	Joshua Smyth
195.	David Squire
196.	Katherine Steer
197.	Oliver Stevens
198.	Madeleine Stewart

100	
199.	Ferdi Suleyman
200.	Vivien Talbot
201.	Ben Taylor
202.	Jacqueline Teggin
203.	Zachary Tenquist
204.	David Thorneywork
205.	Hannah Torrance-Bright
206.	Lucy Trinder
207.	Morgan Trowland
208.	Jan Van Der Knapp
209.	Rik Venhoutteghem
210.	Sally Webber
211.	Leonard Weber
212.	Miranda Whelehan
213.	Philip White
214.	Edred Whittingham
215.	Alexander Wilcox
216.	Clare Wilson
210.	Thomas Winter
217. 218.	Carol-Ann Wood
218.	Lizia Woolf
219.	
	Amorel Kennedy
221.	Grace Lally
222.	Morien Morgan
230.	Alice Wharrie
231.	Anne Hart
232.	Anthony Whitehouse
233.	Callum Goode
234.	Caroline Cattermole
235.	[Not used]
236.	Christopher Hardy
237.	David Nixon
238.	Isabel Walters
239.	Jade Calland
240.	Jane Touil
241.	Joe Howlett
242.	John Jordan
243.	Jonathan Coleman
244.	Judy Judkins
245.	Karan Wildin
246.	Kayleigh Matthews
247.	Larch Maxey
248.	Lindsay Hart
249.	Margaret Reid
250.	Mia Powell
251.	Phoebe Plummer
252.	Sam Parry Holland
252.	Samuel Johnson
253.	Sarah MacDonald
255.	Seiriol Davies

- 256. 257.
- Simon Reding Stephen Gingell Suzie Webb
- 258.
- 259. Victoria Lindsell
- 260.
- Wendy Cocks Diana Martin Tony Muir 261.
- 262.

SCHEDULE 2 – POWER OF ARREST

N110A Power of arrest	Name of court High Court of Justice King's Bench Division	Claim No. QB-2022-001317
	Claimant's name (including re (1) Thurrock Council	ef.)
Name of defendant	(2) Essex County Council	
 (1) Madeline Adams (2)-(222) Other Named Defendants 	Defendant's name (including	
Defendant's address	(223)-(229) Persons Unkno	
See attached continuation sheet	Se	eal OUEEL
Date order made 1 2 / 0 7 / 2 0 2 4 Name of	judge Mr Justice Julian Knowles	VCH DIVISION
Order made under (insert statutory provision)	ighways Act 1980, s130(5)	
This order includes a power of arrest under (insert statutory p	provision)	
Police and Justice Act 2006, s27		
The relevant paragraphs of the order to which a power of a (set out those paragraphs of the order to which the power of arrest		separate sheet)
Paragraphs 2.1 to 2.16 of the Order of Mr Justice Julian Kno This power of arrest was ordered on 1 2 / 0 7 / 2 0 2		0 7 / 2 0 2 9
Note to Arresting Officer		
Where the defendant is arrested under the power given by	Name of Claimant	
section 155 of the Housing Act 1996, or section 27 of the Police and Justice Act 2006; or section 43 of the Policing and Crime Act 2009; or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014:-	(1) Thurrock Council (2) Essex Council	
 the defendant shall be brought before the judge within the period of 24 hours beginning at the time of their arrest; 	Claimant's address	
• a constable shall inform the person on whose application the injunction was granted, forthwith where the defendant is arrested under the power given by section 155 of the Housing Act 1996 or as soon as reasonably practicable where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014.	Sharpe Pritchard LLP Elm Yard 10-16 Elm Street London WC1X 0BJ	
Nothing in section 155 of the Housing Act 1996 or section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014, shall authorise the detention of the respondent after the expiry of the period of 24 hours beginning at the time of their arrest.	Claimant's phone number 020 7405 4600	

IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

<u>In the matter of an application for an injunction made pursuant to the Local Government</u> <u>Act 1972, s222 and the Highways Act 1980, s130(5)</u>

Before the Honourable Mr Justice Julian Knowles 12 July 2024

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(2) ESSEX COUNTY COUNCIL

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-and-

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

Defendants

POWER OF ARREST: CONTINUATION SHEET

DEFENDANTS

PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,	223
CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN,	
OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE	
FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT	
ANNEXE 1 TO THE CLAIM FORM	
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,	224
AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE	
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OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO	
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ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE	
CLAIM FORM	
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,	225
CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN,	

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OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING W	
VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION	
FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURRO	OCK (AS
MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)	. 김 씨는 지수는 것 같이 많이 좋아하는 것
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTES	TING, 226
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VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR I	ΓS
FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS
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OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND	
REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN	
ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP	AT
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PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR	ADJACENT 229
TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY	
UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR	
TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT	HIGHWAY
AUTHORITY	

THE RELEVANT PARAGRAPHS OF THE ORDER TO WHICH A POWER OF ARREST HAVE BEEN ATTACHED ARE:

Paragraphs 2.1 to 2.16 of the Order of Mr Justice Julian Knowles dated 12 July 2024:

- 2. The Defendants and each of them (whether by themselves or by instructing, encouraging or allowing any other person) are forbidden from:
 - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
 - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
 - 2.3 Entering, climbing onto, climbing into, climbing under any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
 - 2.4 Entering, climbing onto, climbing into, climbing under any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested

in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.

- 2.5 Affixing themselves ("locking on") to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.
- 2.6 Affixing themselves ("locking on") to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the "locking on" is for the purpose of protesting.
- 2.7 Affixing themselves ("locking on") or any other items to any of the Roads or any other person or object on, under or over the Roads.
- 2.8 Affixing themselves ("locking on") or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the "locking on" is for the purpose of protesting.
- 2.9 Erecting any structure on the Roads.
- 2.10 Tunnelling, excavating, drilling or digging under or adjacent to the Roads.
- 2.11 Occupying existing tunnels under the Roads for the purpose of protesting.
- 2.12 Causing damage to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.
- 2.13 Abandoning any vehicle or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.
- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station forecourt or access road, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by delivery tankers of fuel supplies and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.

IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

<u>In the matter of an application for an injunction made pursuant to the Local Government</u> Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles 12 July 2024

BETWEEN:

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

(223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

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(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

Defendants

ANNEXE 1

Thurrock Council Roads

NORTH ROAD	B186
SANDY LANE	B1335
ROMFORD ROAD ROUNDABOUT	B1335
MILL ROAD	C Class
PURFLEET ROAD	C Class
WEST ROAD	C Class
ARISDALE AVENUE	C Class
DAIGLEN DRIVE	C Class
STIFFORD ROAD	B1335
LANCE CORPORAL NICKY MASON WAY	B1335
STIFFORD ROAD	B1335
ARTERIAL ROAD	A1306
THURROCK SERVICES ROAD	Unclassified
POND ROAD ROUNDABOUT	Unclassified

LONDON ROAD ROUNDABOUT	A1306
LONDON ROAD ROUNDABOUT	A1306
ENTRY ON SLIP WELLINGTON INTERCHANGE TO A13 EASTBOUND	A1300
EXIT OFF SLIP A13 TO WELLINGTON INTERCHANGE WESTBOUND	A13
PURFLEET BYPASS	B1335
LINK ROAD FROM A13 SOUTHBOUND TO A1306	A1090
CANTERBURY WAY SLIP ROAD ANTICLOCKWISE	A282
LINK ROAD FROM A1306 TO A13 NORTHBOUND	A282
CANTERBURY WAY SLIP ROAD CLOCKWISE	A282
STONEHOUSE CORNER ROUNDABOUT	A1090
ARTERIAL ROAD ROUNDABOUT	A1090
STONEHOUSE LANE	A1090
CYGNET VIEW	Unclassified
ARTERIAL ROAD ROUNDABOUT A1306	A1306
WEST THURROCK WAY RETAIL PARK ROUNDABOUT	B186
ARTERIAL ROAD	A1306
LAKE RISE	Unclassified
OLIVER CLOSE	A1090
ST CLEMENTS WAY ROUNDABOUT	A1090
ST CLEMENTS WAY	A1090
LONDON ROAD	A1090
WEST THURROCK WAY	A126
Access road Cost Co	Unclassified
JUNCTION 30 M25 TO BOROUGH BOUNDARY WESTBOUND	A13
BOROUGH BOUNDARY TO M25 JUNCTION 30 EASTBOUND	A13
ACCESS ROAD FROM BURGHLEY ROAD TO SUPERSTORE	Private Road
BURGHLEY ROAD ROUNDABOUT	B146
SEALLY ROAD	Unclassified
BURGHLEY ROAD	B146
PILGRIMS LANE ROUNDABOUT	A1306
ARTERIAL ROAD	A1306
ENTRY ON SLIP NORTH SLIFFORD ROUNDABOUT TO A13	A1300
EASTBOUND	A13
ENTRY ON SLIP NORTH STIFFORD ROUNDABOUT TO A13	1115
WESTBOUND	A13
EXIT OFF SLIP A13 TO NORTH STIFFORD ROUNDABOUT	
WESTBOUND	A13
EXIT OFF SLIP A13 TO NORTH STIFFORD ROUNDABOUT	
EASTBOUND	A13
STIFFORD ROUNDABOUT	A1012
TREACLE MINE ROUNDABOUT	A1012
LINK FROM A1012 ROUNDABOUT TO A1306 INTERCHANGE	A1012
HOGG LANE	A1012
ELIZABETH ROAD	A1012
HOGG LANE ROUNDABOUT	A1012
LONDON ROAD	A126
HOGG LANE ROUNDABOUT	A1012
EASTERN WAY	A126

LAKESIDE INTERCHANGE TO NORTH STIFFORD ROUNDABOUT	
EASTBOUND	A13
NORTH STIFFORD ROUNDABOUT TO LAKESIDE INTERCHANGE	
WESTBOUND	A13
LAKESIDE INTERCHANGE TO M25 JUNCTION 30 WESTBOUND	A13
JUNCTION 30 M25 TO LAKESIDE INTERCHANGE EASTBOUND	A13
BRENTWOOD ROAD	A128
STANFORD ROAD	A1013
SOUTHEND ROAD	A1013
CEMENT BLOCK COTTAGES	Unclassified
DOCK ROAD	A126
ORSETT COCK ROUNDABOUT	A1013
ENTRY ON SLIP ORSETT COCK ROUNDABOUT TO A13 WESTBOUND	A13
EXIT OFF SLIP A13 EASTBOUND TO ORSETT COCK ROUNDABOUT	A13
EXIT OFF SLIP A13 WESTBOUND TO ORSETT COCK ROUNDABOUT	A13
DENEHOLES ROUNDABOUT	A1013
WOOD VIEW	B149
LODGE LANE	A1013
CHADWELL HILL	C Class
EXIT OFF SLIP A1089 TO A126 SOUTHBOUND	A1089
ENTRY ON SLIP A126 TO A1089 NORTHBOUND	A1089
MARSHFOOT ROAD ROUNDABOUT	A1089 A126
ST CHADS ROAD ROUNDABOUT	A126
GATEWAY ACADEMY ROUNDABOUT MARSHFOOT ROAD	
MARSHFOOT ROAD	A126
MARSHFOOT ROAD MARSHFOOT ROAD	A126
BROADWAY	A126
THURROCK PARK WAY	A126
	Unclassified
ACCESS ROADS FOR ASDA SUPPERSTORE	Unclassified
NORTH STIFFORD ROUNDABOUT TO A1089 EASTBOUND	A13
A1089 TO NORTH STIFFORD ROUNDABOUT WESTBOUND	A13
A1089 TO ORSETT COCK ROUNDABOUT EASTBOUND	A13
ORSETT COCK ROUNDABOUT TO A1089 WESTBOUND	A13
DOCK APPROACH ROAD	A1089
DOCK APPROACH ROAD	A1089
DOCK APPROACH ROAD	A1089
THURROCK PARK WAY ROUNDABOUT	A1089
SLIP ROAD FROM DOCK APPROACH ROAD TO A13	A13
SLIP ROAD FROM DOCK APPROACH ROAD TO A13	A13
STANFORD ROAD	A1013
LONDON ROAD	C Class
ENTRY ON SLIP ORSETT COCK ROUNDABOUT TO A13 EASTBOUND	A13
Orsett Cock FS West Slip Roads	A13
Orsett Cock FS East Slip Roads	A13
STANFORD ROAD	A1013
STANFORD BYPASS INTERCHANGE	A1014
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 EASTBOUND	A13
EXIT OFF SLIP A13 EASTBOUND TO STANFORD INTERCHANGE	A13

EXIT OFF SLIP A13 WESTBOUND TO STANFORD INTERCHANGE	A13
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 WESTBOUND	
SOUTHEND ROAD	B1420
THE MANORWAY SOUTHEND ROAD LINK WESTBOUND	A1014
THE MANORWAY SOUTHEND ROAD LINK EASTBOUND	A1014
THE MANORWAY	A1014
CORRINGHAM ROAD A1014 ROUNDABOUT	A1014
ORSETT COCK ROUNDABOUT TO STANFORD INTERCHANGE	
EASTBOUND	A13
STANFORD INTERCHANGE TO ORSETT COCK ROUNDABOUT	
WESTBOUND	A13
STANFORD INTERCHANGE TO BOROUGH BOUNDARY AT FIVE	4.12
BELLS EASTBOUND BOROUGH BOUNDARY AT FIVE BELLS TO STANFORD	A13
INTERCHANGE WESTBOUND	A13
BELLS CORNER PARADE SOUTHEND ROAD	A13 A176
BELLS CORNER ROUNDABOUT	A176
SOUTHEND ROAD	B1420
LINK ROAD FROM B1420 AND BELLS CORNER ROUNDABOUT TO	
BOUNDARY	B1420
THE MANORWAY	A1014
GIFFORDS CROSS ROAD	C Class
FOBBING ROAD	C Class
CHURCH ROAD	B1420
LAMPITS HILL	B1420
SOUTHEND ROAD	B1420
ENTRY ON SLIP FIVE BELLS ROUNDABOUT TO A13 WESTBOUND	A13
FIVE BELLS ROUNDABOUT SOUTH	A176
FIVE BELLS ROUNDABOUT NORTH	A176
EXIT OFF SLIP A13 EASTBOUND TO FIVE BELLS ROUNDABOUT	A13
FIVE BELLS SLIP ROAD FROM SOUTHEND ROAD WESTBOUND	A13
ASKEWS FARM LANE	Unclassified
WOULDHAM ROAD	Unclassified
LONDON ROAD	A126
ST CLEMENTS WAY ROUNDABOUT	A1090
BURNLEY ROAD	Unclassified
ST CLEMENTS WAY	A1090
STONEHOUSE CORNER ROUNDABOUT	A1090
SHIP LANE	C Class
ARTERIAL ROAD ROUNDABOUT	A1306
STONEHOUSE LANE	A1090
ARTERIAL ROAD	A1306
LONDON ROAD	A1090
LONDON ROAD	A1090
OLIVER ROAD	A1090
OI IVED CLOSE	11000

OLIVER CLOSE

STANFORD BYPASS INTERCHANGE

24

A1090

A1014

A1014
A1014
A1014
A1014
A13
A13
A13
A13
A282
A282
A13
A13

Essex County Council Roads

HAVEN ROAD, CANVEY ISLAND ROSCOMMON WAY, CANVEY ISLAND NORTHWICK ROAD, CANVEY ISLAND A130 FROM SADDLERS FARM ROUNDABOUT TO JUNCTION WITH HAVEN ROAD SADLERS FARM ROUNDABOUT SLIPROADS LEADING TO AND FROM A13 FROM SADLERS FARM ROUNDABOUT SLIPROADS LEADING TO AND FROM A130 FROM SADLERS FARM ROUNDABOUT B1014 CANVEY ROAD FROM WATERSIDE ROUNDABOUT TO ROUNDABOUT ON HIGH STREET BENFLEET CANVEY ISLAND PUBLIC FOOTPATH NUMBER 8 A130 AND B1014 BETWEEN THE ENTRANCE TO THE ISLAND AND ROUNDABOUT KNOWN AS THE WATERSIDE ROAD ROUNDABOUT

IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

<u>In the matter of an application for an injunction made pursuant to the Local Government</u> Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles 12 July 2024

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(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

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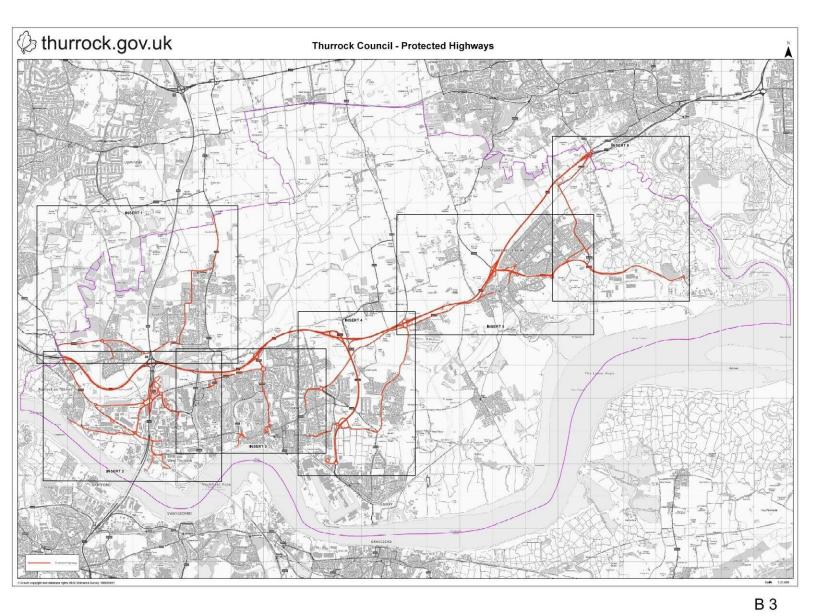
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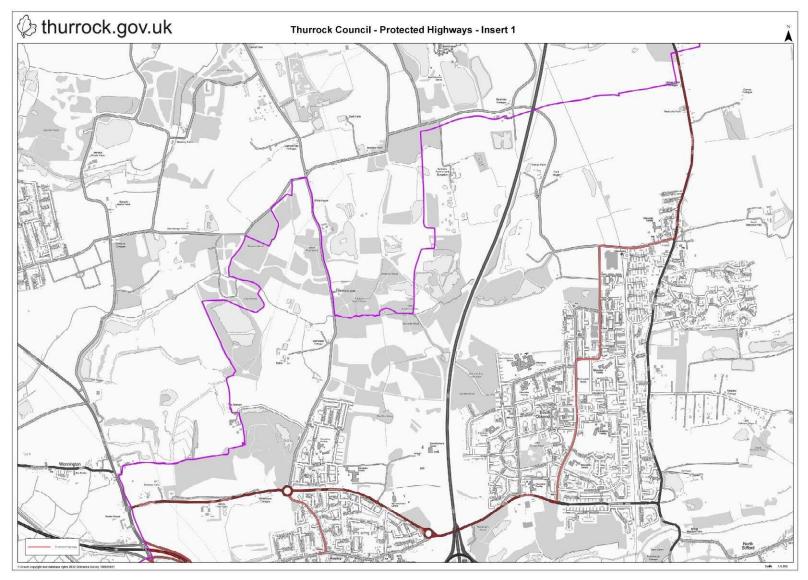
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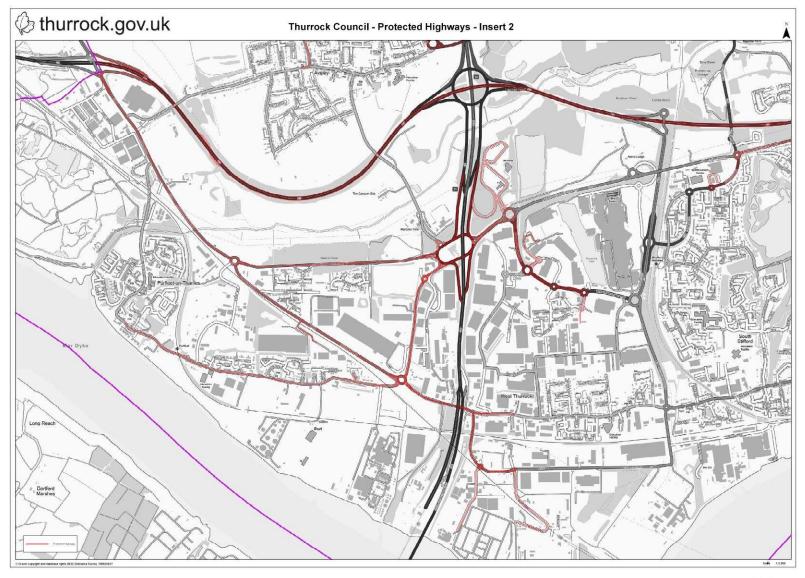
Defendants

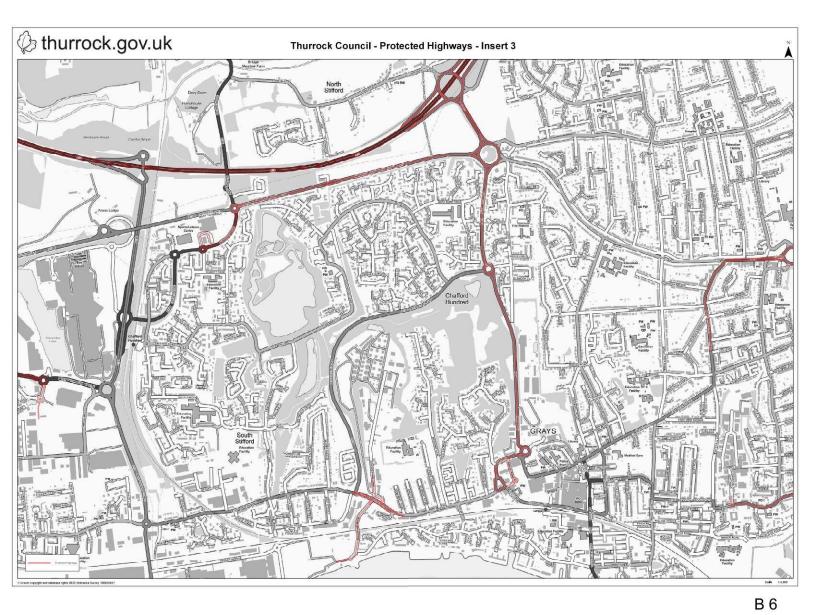
ANNEXE 2

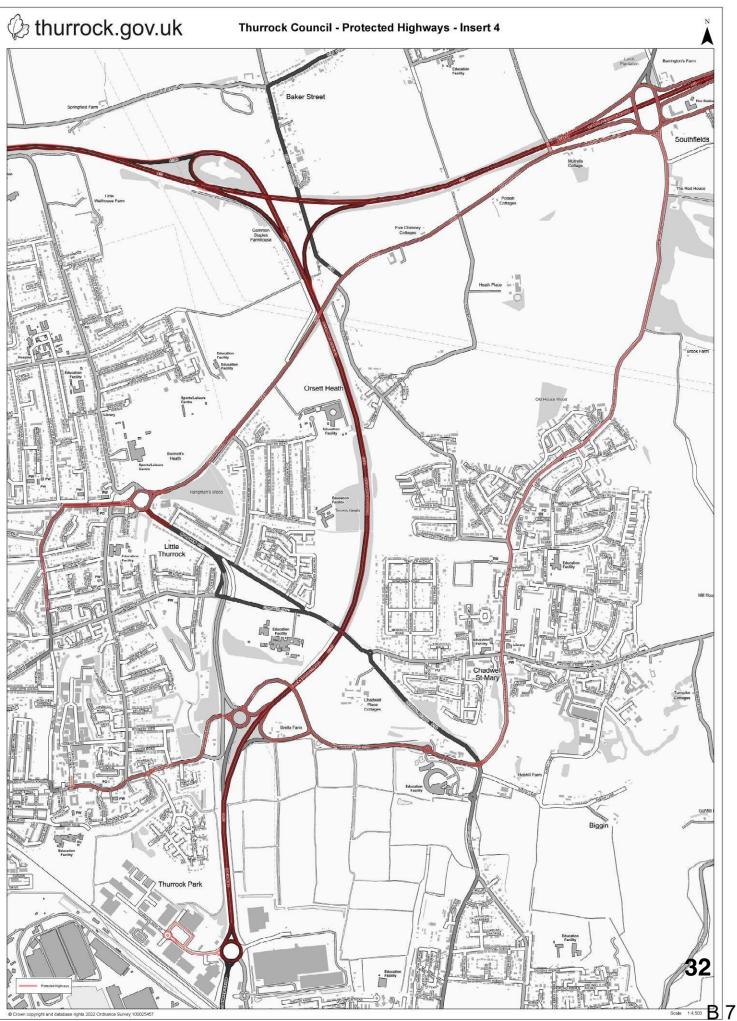


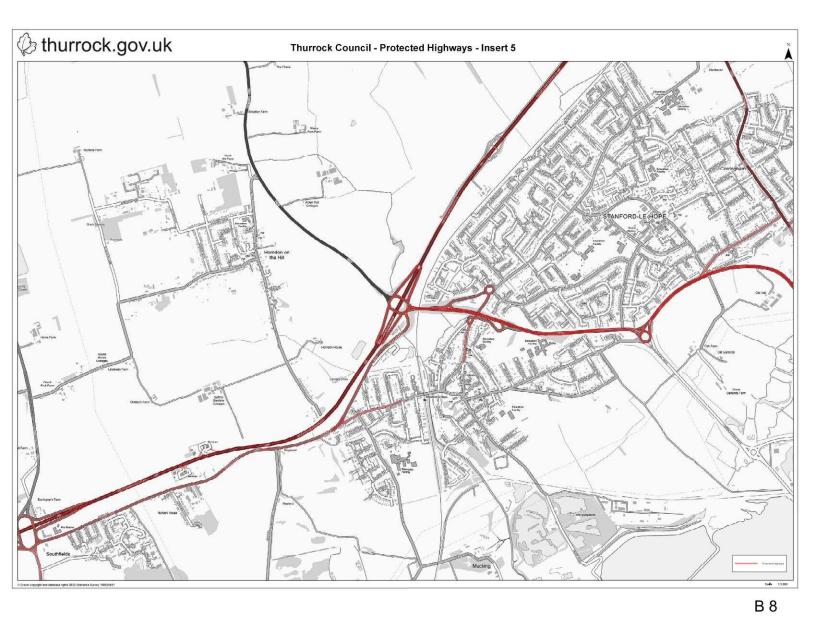


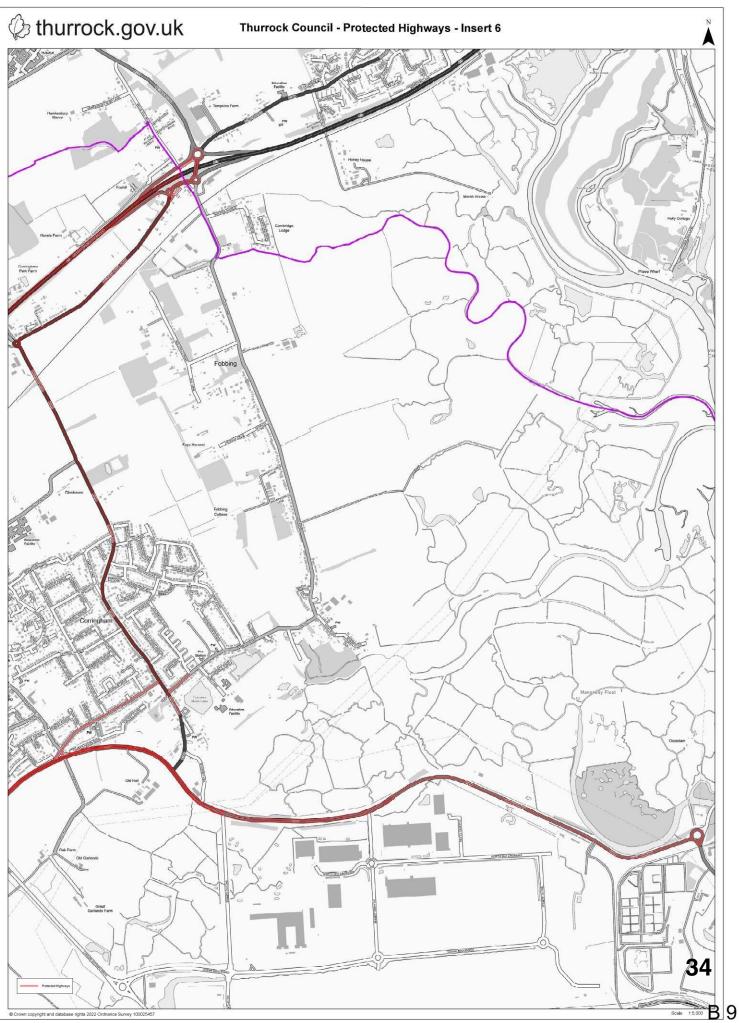
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IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

<u>In the matter of an application for an injunction made pursuant to the Local Government</u> <u>Act 1972, s222 and the Highways Act 1980, s130(5)</u>

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

Defendants

ANNEXE 3



