

**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)**

**B E T W E E N :**

**(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**

**(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)**

**(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)**

**(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)**

**(228) 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 ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)**

**(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**

**Defendants**

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**EXHIBIT AA3/2**

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**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)**

27 May 2022

Before His Honour Judge Simon (sitting as a Judge of the High Court)



**B E T W E E N :**

**(1) THURROCK COUNCIL**

**(2) ESSEX COUNTY COUNCIL**

**Claimants**

**-and-**

**(1) MADELINE ADAMS**

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**Defendants**

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**ORDER**

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**PENAL NOTICE**

**IF YOU, THE ABOVE NAMED 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.**

**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**

**POWER OF ARREST**

**THIS ORDER CONTAINS A POWER OF ARREST ATTACHED AT SCHEDULE 3 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 Claimants making an application on 3 May 2022 for the continuation of the injunction order made by Ritchie J out of hours and without notice to the Defendants on 24 April 2022 (the ‘Application’)

**AND UPON** hearing Counsel for the Claimants, Caroline Bolton and Natalie Pratt, and Counsel for the Sixty-Third Defendant (Ms Ella Eason), Stephen Simblet QC, and other Defendants neither appearing nor being represented

**AND UPON** the Court reading the application and the witness statements listed in Schedule B

**AND UPON** the Court having particular regard to the importance of the Defendants’ Article 10 and Article 11 Convention rights to freedom of expression and freedom of lawful assembly

**AND UPON** the Court being satisfied that the order sought does not prohibit peaceful protest

**AND UPON** the Court considering its discretion to grant injunctive relief pursuant to s.37(1) Senior Courts Act 1981 and considering it just and convenient to do so

**AND UPON** the Court being satisfied for the purposes of s.27(3) Police and Justice Act 2006, that there is a significant risk of harm to a person or persons from the conduct prohibited by this Order and that a power of arrest should be attached to some of the prohibitions contained in this Order

**AND UPON** the Court accepting the undertakings given in Schedule A of this Order

**AND UPON** the Sixty-Third Defendant making an oral application for permission to appeal

**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.

## **INJUNCTION**

### **Prohibitions**

2. Until and subject to any further order of the Court, 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.
- 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 3 of this Order.

### **Alternative service**

4. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission, in addition to personal service, or in the alternative to personal service, to serve the **1<sup>st</sup> to 222<sup>nd</sup> Defendants** and any further named Defendants with the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest by **all** of the following methods (4.1 – 4.5 to be treated conjunctively):

- 4.1 **Websites:** placing a copy of the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest on the Claimants' websites and Facebook pages; and

- 4.2 **Email:** sending a copy of this Order to Just Stop Oil, Youth Climate Swarm, Extinction Rebellion and Insulate Britain at the following email addresses: [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com); [youthclimateswarm@protonmail.com](mailto:youthclimateswarm@protonmail.com); [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk); [insulatebritainpress@protonmail.com](mailto:insulatebritainpress@protonmail.com) and providing a web link at which they can access the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order; and

- 4.3 **Post:** where an address of a named Defendant is known to the Claimants, by posting a copy of this Order together with a covering letter through the letterbox of the named Defendant's address (or by leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact that the package contains a court order. If the premises do not have a letterbox, or mailbox, or the package will not fit through the letterbox, a package may be left next to the front door and a notice containing this Order may be affixed to the front door marked with a notice drawing the recipient's attention to the fact that the package contains a court order and Claim Form and should be read urgently. The notices shall be given in the form set out in Schedule 2 to this Order; and

- 4.4 **Text messages:** sending a text message to any named Defendant for whom the Claimants have a mobile telephone number, notifying them that an injunction order has been granted against them with a power of arrest, and providing a web link at which the Defendant can access the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this



Order. The notice shall be given in the form set out in Schedule 2 to this Order; and

- 4.5 **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 Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest can be accessed; or
  - 4.6 **Where requested:** the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest may be served by email where the Defendant has requested that they be served by email and by sending the email to the address provided by the Defendant; or
  - 4.7 **Lawyers:** By serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
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.
  6. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission to serve the **223<sup>rd</sup> to the 229<sup>th</sup> Defendants** with the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest by the methods in paragraphs 4.1, 4.2 and 4.5 above (to be read conjunctively).
  7. The **deemed date of service** of any of the documents referred to in paragraph 6 above shall be the day on which service of the document or documents is completed in accordance with paragraph 6 above.
  8. The Defendants shall acknowledge service of the Claim Form 21 days after the deemed date of service and file any written evidence in support of the Defence by the same date.

#### **Further directions**

9. 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).

10. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time (to the extent they are not already so named).
11. The Claimant has permission to apply to extend or vary this Order or for further directions. The Claimant must serve any such application on those Defendants who have acknowledged service and provided an address for service.

### **Review hearing**

12. The continued operation of this order shall be reviewed at a hearing. The Claimants shall apply by 4pm on 14 February 2023 to list that review hearing, which hearing shall be held no later than 22 May 2023. Any evidence in support or opposition to the continued operation of this order shall be filed by 4pm on 28 April 2023.

### **Permission to appeal**

13. The Sixty-Third Defendant's Application for permission to appeal is refused.
14. If the Sixty-Third Defendant seeks permission to appeal from the Court of Appeal, then pursuant to CPR Rule 52.12(2)(a), she must do so by 8 July 2022.

### **Costs**

15. The 1<sup>st</sup> to 222<sup>nd</sup> Defendants shall pay 50% of the Claimants' costs subject to detailed assessment if not agreed. Those costs shall be apportioned between the 1<sup>st</sup> to 222<sup>nd</sup> Defendants.

## **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).
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-Undertakings;
  - (ii) Schedule B-Witness Statements;
  - (iii) Schedule 1-List of Named Defendants;
  - (iv) Schedule 2-Notices;
  - (v) Schedule 3-The Power of Arrest;
  - (vi) Annexe 1-The List of “The Roads” in Thurrock;
  - (vii) Annexe 2-The map of the Administrative Area of Thurrock; and (viii) Annexe 3-The map of the Administrative Area of Essex.

### **Communications with the Court**

6. 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-UNDERTAKINGS**

1. The Claimants undertake to use reasonable endeavours to personally serve the named Defendants with a copy of this Order. In the event of alternative service, with the exception of paragraph 4.5 above, such shall be effected within 28 days of the date of this order.
2. The Claimants undertake to identify and name Defendants and apply to add them as named Defendants to this Order and the Claim as soon as reasonably practicable.
3. The Claimants undertake to amend within 14 days of this Order the second substantive sentence of the signs referred to in paragraph 4.5 of the Injunction Order above to read “PROTESTING ON THE HIGHWAY IS SUBJECT TO RESTRICTIONS AND THERE ARE SITES PROTECTED BY THE INJUNCTION”.

### **SCHEDULE B-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.
2. The Court read the following witness statements filed on behalf of the Sixty-Third Defendant:
- (a) The first witness statement of Alice Hardy dated 9.5.2022;
  - (b) The witness statement of Ella Eason dated 9.5.2022;
  - (c) The witness statement of Jessica Branch dated 9.5.2022; (d) The second witness statement of Alice Hardy dated 13.5.2022; (e) The third witness statement of Alice Hardy dated 16.5.2022.

#### **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 Bramwell
- (26) 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
- (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 Ivanov
- (100) Rik Jansen
- (101) Ruth Jarman
- (102) Stephen Jarvis
- (103) Russell Jarvis
- (104) John Johnson
- (105) Hannah Johnston
- (106) Timothy Jones
- (107) Pascale Kann
- (108) Hallum Kelly
- (109) Linda Latter
- (110) Charles Laurie
- (111) Peter Lay
- (112) Eben Lazarus
- (113) Isobel Lewis
- (114) 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
- (171) Anne Richards
- (172) Bethan Roberts
- (173) Jasmin Robertson
- (174) Sebastian Roblyn
- (175) Isabel Rock
- (176) Elizabeth Rosser
- (177) Christian Rowe
- (178) Finn Roweth
- (179) Adelheid Russenberger
- (180) Isla Sandford
- (181) Daniel Sargison
- (182) James Sargison
- (183) Cat Scothorne
- (184) James Sebley
- (185) Rosa Sharkey
- (186) Sophie Sharples
- (187) Susan Sidey
- (188) James Skeet
- (189) Hannah Skwarska
- (190) 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
- (199) Ferdi Suleyman
- (200) Vivien Talbot
- (201) Ben Taylor
- (202) Jacqueline Teggins
- (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
- (217) Thomas Winter
- (218) Carol-Ann Wood
- (219) Lizia Woolf
- (220) Amorel Kennedy
- (221) Grace Lally
- (222) Morien Morgan

## SCHEDULE 2-NOTICES

**On the package containing this Order:**

**“VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWNLOAD IT FROM <https://www.thurrock.gov.uk/protest-injunction> OR CALL 020 7405 4600”**

**to affix to the front door when the package has been posted through the letterbox or placed in a mailbox:**

**“VERY URGENT: A PACKAGE HAS BEEN LEFT THAT CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWLOAD IT FROM <https://www.thurrock.gov.uk/protest-injunction> OR CALL 020 7405 4600”**

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**“VERY URGENT: A HIGH COURT INJUNCTION ORDER HAS BEEN MADE AGAINST YOU, THE LINK PROVIDED IN THIS TEXT MESSAGE CONTAINS AN ORDER OF THE HIGH COURT AND THE SUPPORTING DOCUMENTS RELIED UPON BY THE CLAIMANTS. YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL 020 7405 4600”**

**SCHEDULE 3-POWER OF ARREST**

# Power of arrest

Name of defendant

(1) Madeline Adams  
 (2)-(222) Other Named Defendants  
 (223)-(229) Persons Unknown (see continuation sheet)

Defendant's address

See attached continuation sheet

<b>Name of court</b> High Court of Justice Queen's Bench Division	<b>Claim No.</b> QB-2022-001317
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**Claimant's name** (including ref.)  
 (1) Thurrock Council  
 (2) Essex County Council

**Defendant's name** (including ref.)  
 (1) Madeline Adams  
 (2)-(222) Other Named Defendants  
 (223)-(229) Persons Unknown



Date order made 27/05/2022

Name of judge HHJ Simon (sitting as a Judge of the High Court)

**Order made under** (insert statutory provision)

Local Government Act 1972, s222 and Highways Act 1980, s130(5)

This order includes a power of arrest under (insert statutory provision)

Police and Justice Act 2006, s27

The relevant paragraphs of the order to which a power of arrest has been attached are:

(set out those paragraphs of the order to which the power of arrest is attached, if necessary continue on a separate sheet)

Paragraphs 2.1 to 2.16 of the Order of HHJ Simon (sitting as a Judge of the High Court) dated 27 May 2022 (see attached continuation sheet)

**This power of arrest was ordered on** 27/05/2022 **and expires on the** 27/05/2023

**Note to Arresting Officer**

Where the defendant is arrested under the power given by 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:-

- the defendant shall be brought before the judge within the period of 24 hours beginning at the time of their arrest;
- 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.

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.

In calculating any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Name of Claimant

(1) Thurrock Council  
 (2) Essex Council

Claimant's address

Sharpe Pritchard LLP  
 Elm Yard  
 10-16 Elm Street  
 London  
 WC1X 0BJ

Claimant's phone number

020 7405 4600

**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)**

27 May 2022

Before HHJ Simon (sitting as a Judge of the High Court)

**B E T W E E N :**

220. THURROCK COUNCIL

221. 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**

**(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)**

**(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)**

**(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)**

**(228) 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 ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)**

**(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**

**Defendants**

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**POWER OF ARREST: CONTINUATION SHEET**

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**NAMES AND ADDRESSES OF DEFENDANTS**

<b>Surname</b>	<b>Forename</b>	<b>Address</b>	<b>Defendant Number</b>
ADAMS	MADELINE	████████████████████ ████████████████	1
ADAMS	MARY	████████████████████ ████████████████	2
ADDY	DAVID	████████████████████ ████	3

ALEXANDER	AMBER	[REDACTED] [REDACTED] [REDACTED]	4
ALEXANDER	MINA-MAE	[REDACTED] [REDACTED]	5
ANDERSON	ERIC	[REDACTED] [REDACTED] [REDACTED]	6

ASLETT	NICHOLAS	[REDACTED] [REDACTED]	8
ASLETT	CHRISTINE	[REDACTED] [REDACTED]	7
AYLES	LACHLAN	[REDACTED] [REDACTED]	9
AYLETT	STEPHANIE	[REDACTED] [REDACTED]	10
BAILEY	PETE	[REDACTED] [REDACTED]	11
BAJWA	WILLIAM	[REDACTED] [REDACTED]	12
BANKS	JEREMY	[REDACTED] [REDACTED]	13
BARRINGTON	COLIN	[REDACTED] [REDACTED]	14
BARTLETT	KAI	[REDACTED] [REDACTED]	15
BATES	JOSHUA	[REDACTED] [REDACTED]	16
BENNETT	CHRISTOPHER	[REDACTED]	17
BIRD	GILLIAN	[REDACTED] [REDACTED]	18
BLANCO	JOHN	[REDACTED] [REDACTED]	19
BLEWETT	JOHN	[REDACTED] [REDACTED]	20
BLISS	POPPY	[REDACTED] [REDACTED]	21
BOND	HILARY	[REDACTED] [REDACTED]	22
BOULDEN	TREVOR	[REDACTED] [REDACTED]	23
BOWMAN	GEOFFREY	[REDACTED] [REDACTED]	24

BRAMWELL	SIMON	[REDACTED]	25
BREAM	JOSEPH	[REDACTED]	26
BREEN	SCOTT	[REDACTED]	27
BRETT	STEPHEN	[REDACTED]	28
BROCKLEBANK	EMILY	[REDACTED]	29
BROOK	CLAIRE	[REDACTED]	30
BROOKER	EMMA	[REDACTED]	31

BROWN	MICHAEL	[REDACTED]	32
BRUCE	JUDITH	[REDACTED]	33
BUDD	MADELEINE	[REDACTED]	34
BURNS	TES	[REDACTED]	35
BUSE	BENJAMIN	[REDACTED]	36
CANNON	CATHERINE	[REDACTED]	37
CASSAR	REBECCA	[REDACTED]	38
CAUSBY	JESSICA	[REDACTED]	39
CHAMBERLAYNE	SUSAN	[REDACTED]	40
CHAPMAN	SALLY	[REDACTED]	41
CHAUHAN	VISHAL	[REDACTED]	42
CHESTERMAN	KATHERINE	[REDACTED]	43
CLARKE	PHILIPPA	[REDACTED]	44
CLEGG	OLIVER	[REDACTED]	45

		████████████████████ ████████████████	
COGHLAN	ORLA	████████████████████ ██████████████	46
COGHLAN	JOHN	████████████████████ ████████████████████	47
COOK	RUTH	████████████████████ ██████████████████	48
COOPER	HEATHER	████████████████████ ██████████	49
CORKHILL HARRIS	JASMINE	████████████████████ ██████████████	50
CORRIGAN	JOY SUSAN	████████████████████ ██████████████	51
CRANE	RICHARD	████████████████████ ██████████████	52
CRAWFORD	DAVID	████████████████████ ███	53
CROFT	ROSEMARY	████████████████████ ██████████	54

DALDORPH	JOSEPH	████████████████████ ██████████	55
DANIEL	BEVERLEY ANN	████████████████████ ██████████	56
DELAP	BEN	████████████████████ ██████████████	57
DELAP	GAIE	████████████████████ ██████████████	58
DITTON	GABRIELLA	████████████████████ ███	59
DJOMINS	IGORS	██████████████████	60
DOEHLEI	LAURA	████████████████████ ██████████████	61
DOUBLEDAY	MARGUERITE	██████████████████ ██████████████	62
EASON	ELLA	████████████████████ ██████████████	63
ESSEX	CHRISTINE	████████████████████ ██████████████	64
FLYNN	JANET	████████████████████ ██████████████	65
FORTON	MICHAEL	██████████████████	66



FREWER	PHOEBE	[REDACTED]	67
FRIEL	AMY	[REDACTED]	68
GARDNER	ROBIN	[REDACTED]	69
GETHING	CRESSIDA	[REDACTED]	70
GIBSON	ALASDAIR	[REDACTED]	71
GLASHIER	HUGO	[REDACTED]	72
GOLDER	STEPHANIE	[REDACTED]	73
GOLDRING	WILLIAM	[REDACTED]	74
GONZALEZ TRIMMER	XAVIER	[REDACTED]	75
GOODLAND	ALFIE	[REDACTED]	76
GOODWIN	EMMA-ROSE	[REDACTED]	77
GREENLAND	SOPHIE	[REDACTED]	78
GUNNING	AARON	[REDACTED]	79
HADDEN	LOUISA	[REDACTED]	80

HALLETT	CATHERINE	[REDACTED]	81
HALSALL	FINN	[REDACTED]	82
HANDLING	JAKE	[REDACTED]	83
HARPER	GARETH	[REDACTED]	84
HARRIS	LOUISE	[REDACTED]	85
HART	PATRICK	[REDACTED]	86
HAYWARD	YVONNE	[REDACTED]	87
HEIMEDINGER	SELMA	[REDACTED]	88

HERBERT	JONATHAN	[REDACTED]	89
HERFORD	NOAH	[REDACTED]	90
HETHERINGTON	SUZANNE	[REDACTED]	91
HIRONS	SARAH	[REDACTED]	92
HORLICK	RUPERT	[REDACTED]	93
HOWLETT	ADRIAN	[REDACTED]	94
HOYLAND	ERIC	[REDACTED]	95
HUBBUCKS	ABIGAIL	[REDACTED]	96
HUNT	HANNAH	[REDACTED]	97
IRELAND	EMMA	[REDACTED]	98
IVANOV	PAVEL	[REDACTED]	99
JANSEN	RIK	[REDACTED]	100
JARMAN	RUTH	[REDACTED]	101
JARVIS	STEPHEN	[REDACTED]	102
JARVIS	RUSSELL	[REDACTED]	103
JOHNSON	JOHN	[REDACTED]	104

JOHNSTON	HANNAH	[REDACTED]	105
JONES	TIMOTHY	[REDACTED]	106
KANN	PASCALE	[REDACTED]	107
KELLY	HALLUM	[REDACTED]	108
LATTER	LINDA	[REDACTED]	109

LAURIE	CHARLES	[REDACTED]	110
LAY	PETER	[REDACTED]	111
LAZARUS	EBEN	[REDACTED]	112
LEWIS	ISOBEL	[REDACTED]	113
LEWIS-HOLMES	ELANOR	[REDACTED]	114
LINHART	JOSEPH	[REDACTED]	115
LITTEN	EL	[REDACTED]	116
LOCKYER	REBECCA	[REDACTED]	117
LOZANO	FELIX	[REDACTED]	118
LUND	BARBARA	[REDACTED]	119
MACEY	JACQUELINE	[REDACTED]	120
MACLEAN	CATHERINE	[REDACTED]	121
MAIN	JACOB	[REDACTED]	122
MCCORMACK	ELIZABETH	[REDACTED]	123
MCFADDEN	EILIDH	[REDACTED]	124
MCGOVERN	NATHAN	[REDACTED]	125
MCKECHNIE	LOUIS	[REDACTED]	126
MCKIM	LILAH	[REDACTED]	127
MCMEEKIN	GRACE	[REDACTED]	128
MEANEY	ADALAIDE	[REDACTED]	129
MIDDLETON	ANNA	[REDACTED]	130

MILES	HANNAH	[REDACTED]	131
MITCHELL	DARCY	[REDACTED]	133
MITCHELL	BENJAMIN	[REDACTED]	132
MITCHELL	DEBORAH	[REDACTED]	134
MONROE	TEDDY	[REDACTED]	135
MOORE	FIONA	[REDACTED]	136
MOROSI	STEFANIA	[REDACTED]	137
MOROZZO	PAUL	[REDACTED]	138
MORRIS	VIRGENIA	[REDACTED]	139
MORRISON	PAUL	[REDACTED]	140
MULLEN	ZAK	[REDACTED]	141
MULVEY	ALEXANDRA	[REDACTED]	142
MYCHALECKYJ	REUBEN	[REDACTED]	143
NEWELL-PRICE	RICHARD	[REDACTED]	144
NEWMAN	BEN	[REDACTED]	145
NEWNHAM	ALEXANDER	[REDACTED]	146
NORGARD	JESSICA	[REDACTED]	147
NORRIS	RACHEL	[REDACTED]	148
NORRIS	ROSE	[REDACTED]	149
OAKENFOLD	GEORGE	[REDACTED]	150
ONLEY	NICHOLAS	[REDACTED]	151
PABINIAK	JAKUB	[REDACTED]	152

PAEZ	ELLA-ROSE	[REDACTED] [REDACTED] [REDACTED]	153
PAGE HALL	SOPHIE	[REDACTED] [REDACTED]	154
PARFITT	SUSAN	[REDACTED] [REDACTED]	155
PARSONS	DILLON	[REDACTED] [REDACTED]	156
PATTERSON	ROSE	[REDACTED] [REDACTED]	157
PAUL	ETHAN	[REDACTED] [REDACTED]	158
PEARS	ROSALIND	[REDACTED] [REDACTED]	159
PERCY-RATCLIFF	ABIGAIL	[REDACTED] [REDACTED]	160
PETHICK	URSULA	[REDACTED] [REDACTED]	161
PHILLIPS	JACQUELINE	[REDACTED] [REDACTED]	162
PHILLIPS-WHITE	MITCHEL	[REDACTED] [REDACTED]	163
POSSNETT	ROBERT	[REDACTED] [REDACTED] [REDACTED]	164
POWELL	MATTHEW	[REDACTED] [REDACTED]	165
PRICE	ROBERT	[REDACTED] [REDACTED]	167
PRICE	EMILY	[REDACTED] [REDACTED]	166
PRITCHARD	AMY	[REDACTED] [REDACTED]	168
REEVES-WHYMARK	FELIX	[REDACTED] [REDACTED] [REDACTED]	169
REBALLACK	ANNA	[REDACTED] [REDACTED]	170
RICHARDS	ANNE	[REDACTED] [REDACTED]	171
ROBERTS	BETHAN	[REDACTED]	172

		████████████████████ ██████████████	
ROBERTSON	JASMIN	████████████████████ ██████████████████ ██████████████	173
ROBLYN	SEBASTIAN	████████████████████	174
ROCK	ISABEL	██████████████████ ██████████████	175

ROSSER	ELIZABETH	████████████████████ ██████████████████ ███	176
ROWE	CHRISTIAN	██████████████████ ██████████████	177
ROWETH	FINN	████████████████████ ██████	178
RUSSENBERGER	ADELHEID	████████████████████ ██████████████	179
SANDFORD	ISLA	██████████████████ ██████████████	180
SARGISON	DANIEL	██████████████████ ██████████████	181
SARGISON	JAMES	██████████████	182
SCOTHORNE	CAT	██████████████████ ██████████████	183
SEBLEY	JAMES	██████████████████ ██████████████	184
SHARKEY	ROSA	██████████████████ ██████████████	185
SHARPLES	SOPHIE	██████████████████ ██████████████	186
SIDEY	SUSAN	██████████████████ ██████████████	187
SKEET	JAMES	██████████████████ ██████████████	188
SKWARSKA	HANNAH	██████████████████ ██████████████	189
SLADE	JACQUELINE	██████████████████ ██████	190
SLAUGHTER	OLIVER	██████████████████ ██████████████	191
SMARTKNIGHT	DAVID	██████████████████ ██████████████	192

SMITH	HEATHER	[REDACTED]	193
SMYTH	JOSHUA	[REDACTED]	194
SQUIRE	DAVID	[REDACTED]	195
STEER	KATHERINE	[REDACTED]	196
STEVENS	OLIVER	[REDACTED]	197
STEWART	MADELEINE	[REDACTED]	198

SULEYMAN	FERDI	[REDACTED]	199
TALBOT	VIVIEN	[REDACTED]	200
TAYLOR	BEN	[REDACTED]	201
TEGGIN	JACQUELINE	[REDACTED]	202
TENQUIST	ZACHARY	[REDACTED]	203
THORNEYWORK	DAVID	[REDACTED]	204
TORRANCEBRIGHT	HANNAH	[REDACTED]	205
TRINDER	LUCY	[REDACTED]	206
TROWLAND	MORGAN	[REDACTED]	207
VAN DER KNAAP	JAN	[REDACTED]	208
VANHOUTTEGHEM	RIK	[REDACTED]	209
WEBBER	SALLY	[REDACTED]	210
WEBER	LEONARD	[REDACTED]	211
WHELEHAN	MIRANDA	[REDACTED]	212

		[REDACTED]	
WHITE	PHILIP	[REDACTED] [REDACTED]	213
WHITTINGHAM	EDRED	[REDACTED] [REDACTED]	214
WILCOX	ALEXANDER	[REDACTED] [REDACTED] [REDACTED]	215
WILSON	CLARE	[REDACTED] [REDACTED] [REDACTED]	216
WINTER	THOMAS	[REDACTED] [REDACTED]	217
WOOD	CAROL-ANN	[REDACTED] [REDACTED]	218
WOOLF	LIZIA	[REDACTED] [REDACTED]	219
KENNEDY	AMOREL	[REDACTED] [REDACTED]	220
LALLY	GRACE	[REDACTED] [REDACTED]	221
MORGAN	MORIEN	[REDACTED] [REDACTED]	222
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			223
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			224
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)			225



PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)	226
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)	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 ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)	228
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	229

**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 HHJ Simon (sitting as a Judge of the High Court) dated 27 May 2022:

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

27 May 2022

Before His Honour Judge Simon (sitting as a Judge of the High Court)



**B E T W E E N :**

**(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**

**(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)**

**(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)**

**(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)**

**(228) 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 ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)**

**(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**

**Defendants**

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**ANNEXE 1**

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**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	A1306
ENTRY ON SLIP WELLINGTON INTERCHANGE TO A13 EASTBOUND	A13
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	
EASTBOUND	A13
ENTRY ON SLIP NORTH STIFFORD ROUNDABOUT TO A13	
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	A126
ST CHADS ROAD ROUNDABOUT	A126
GATEWAY ACADEMY ROUNDABOUT MARSHFOOT ROAD	A126
MARSHFOOT ROAD	A126
MARSHFOOT ROAD	A126
BROADWAY	A126
THURROCK PARK WAY	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	A13
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 BELLS EASTBOUND	A13
BOROUGH BOUNDARY AT FIVE BELLS TO STANFORD INTERCHANGE WESTBOUND	A13
BELLS CORNER PARADE SOUTHEND ROAD	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
OLIVER CLOSE	A1090
STANFORD BYPASS INTERCHANGE	A1014
CORRINGHAM ROAD A1014 ROUNDABOUT	A1014
THE MANORWAY	A1014
THE MANORWAY	A1014
THE MANORWAY	A1014
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 WESTBOUND	A13
EXIT OFF SLIP A13 EASTBOUND TO STANFORD INTERCHANGE	A13
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 EASTBOUND	A13
EXIT OFF SLIP A13 WESTBOUND TO STANFORD INTERCHANGE	A13
CANTERBURY WAY SLIP ROAD ANTICLOCKWISE	A282
CANTERBURY WAY SLIP ROAD CLOCKWISE	A282
LINK ROAD FROM A13 SOUTHBOUND TO A1306	A13
LINK ROAD FROM A1306 TO A13 NORTHBOUND	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



**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)**

27 May 2022

Before His Honour Judge Simon (sitting as a Judge of the High Court)

**B E T W E E N :**

**(1) THURROCK COUNCIL**

**(2) ESSEX COUNTY COUNCIL**

**Claimants**

**-and-**

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**(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE  
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**(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  
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**(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,  
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VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER,  
OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY  
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VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS**

**FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)**

**(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)**

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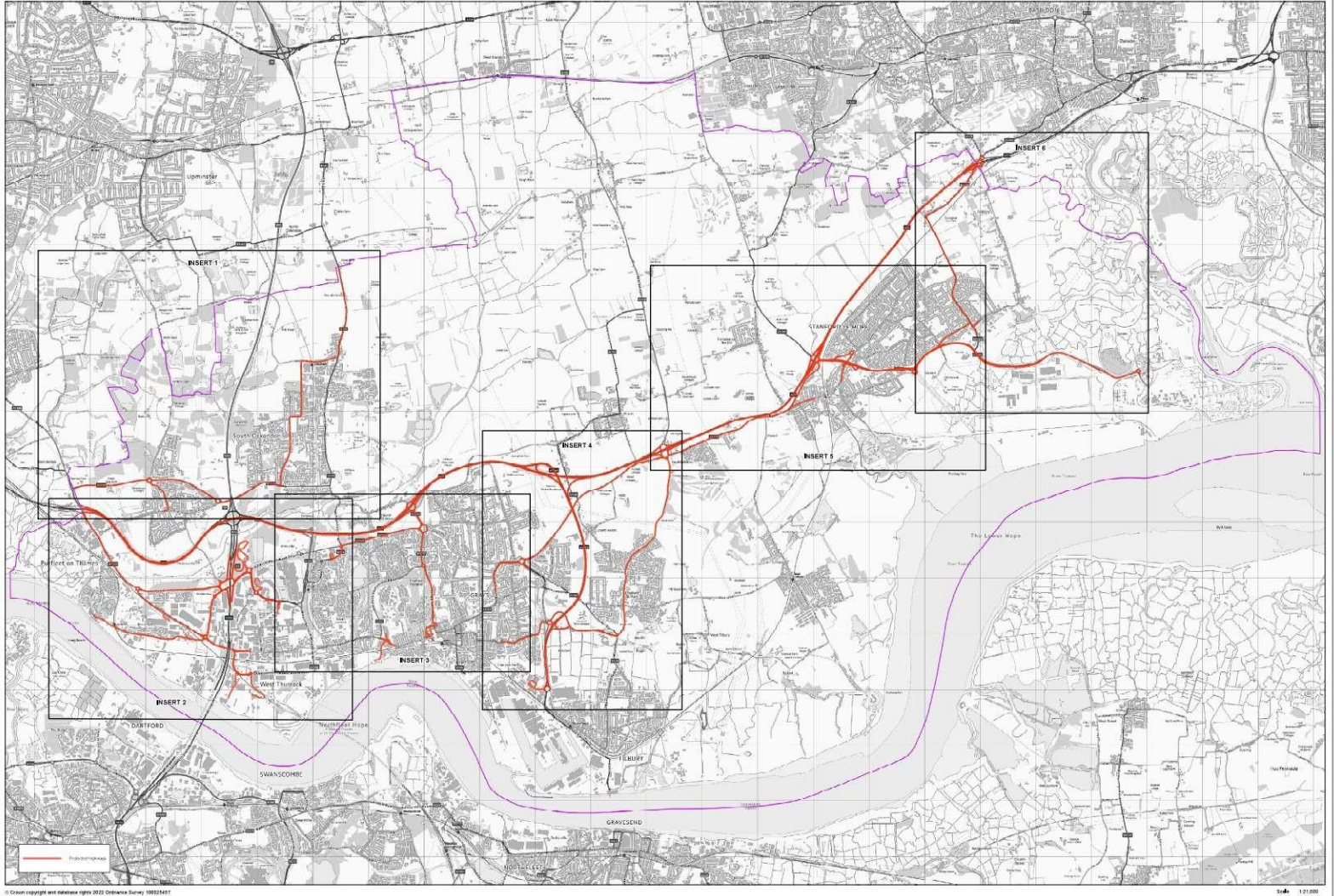
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**Defendants**

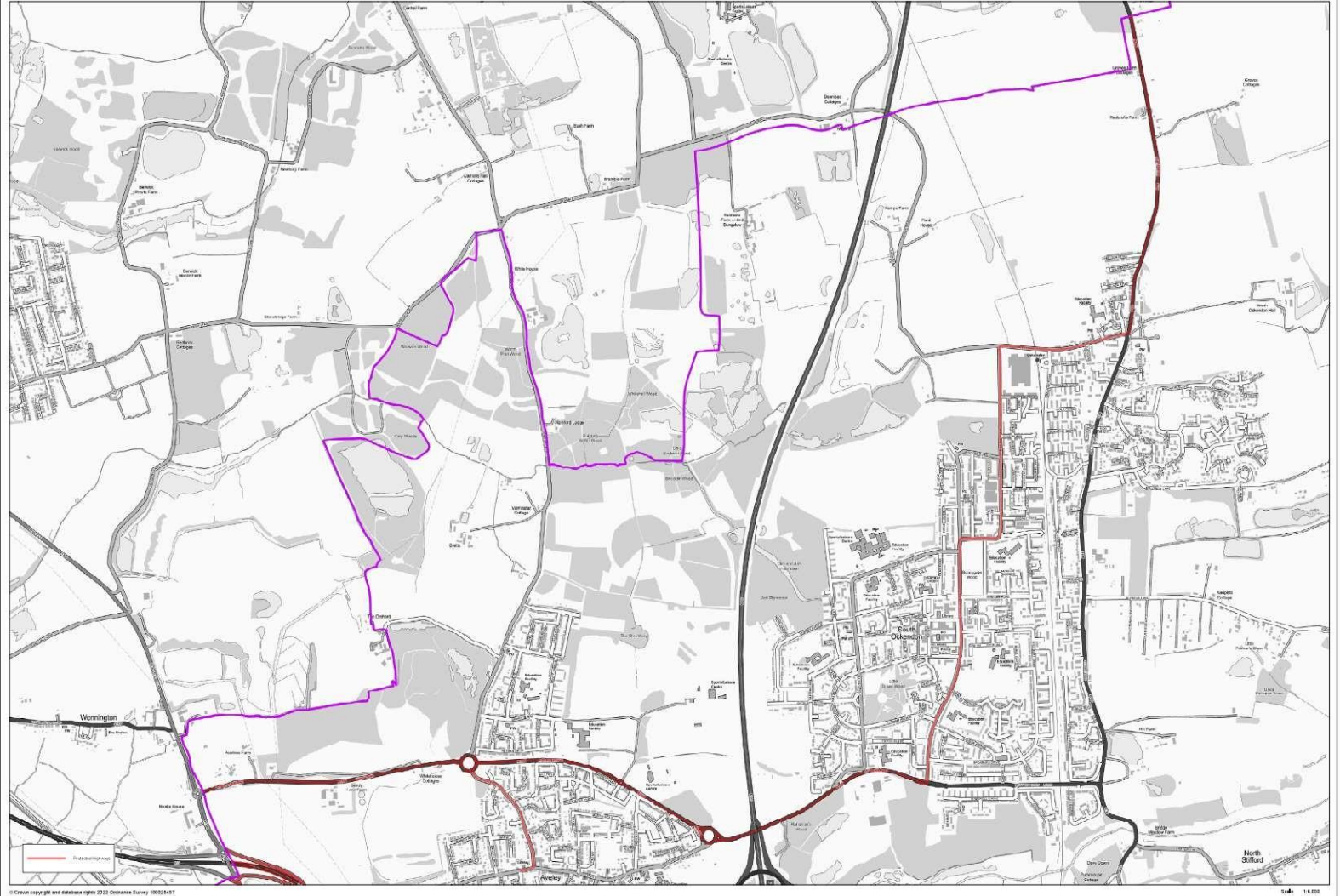
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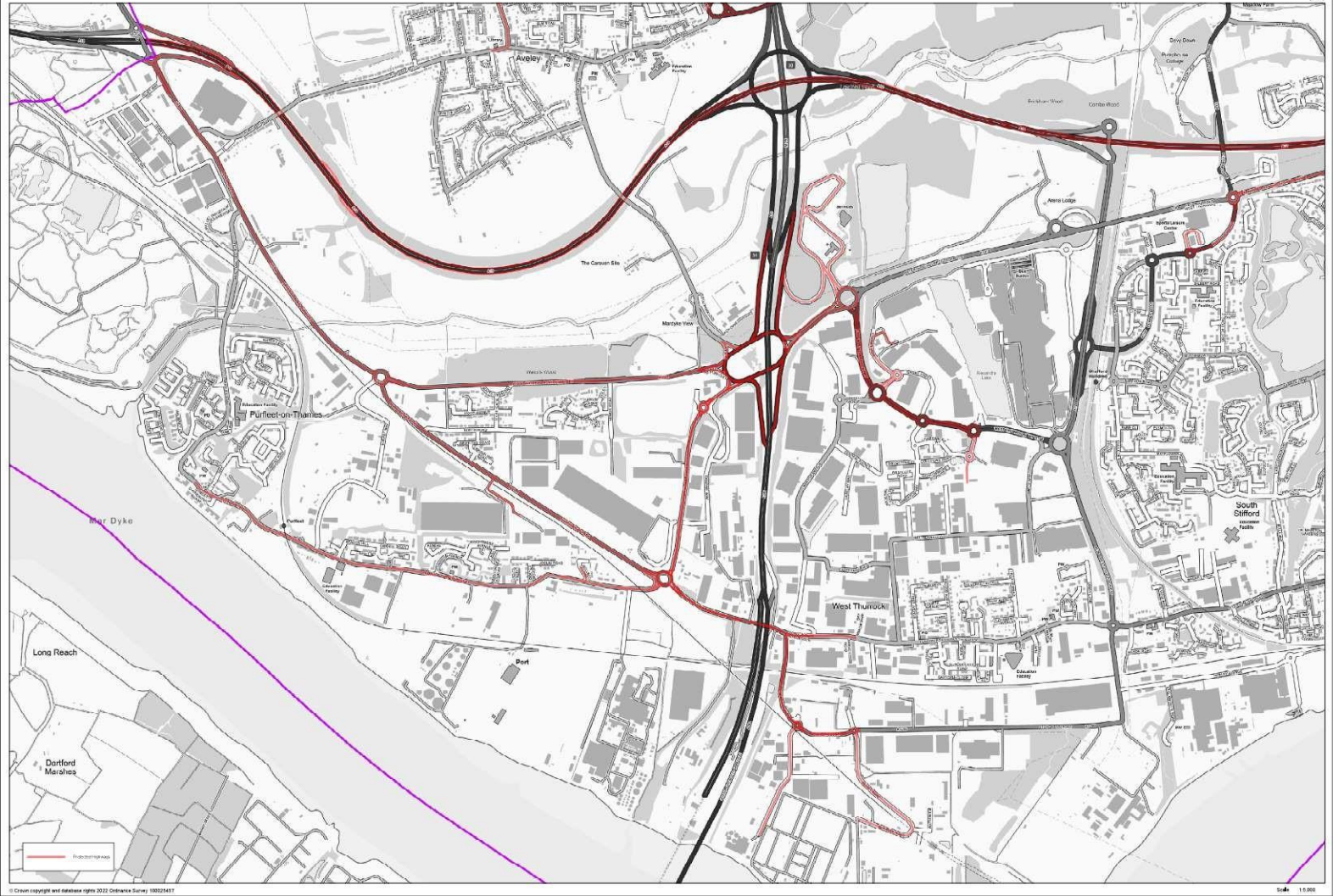
**ANNEXE 2**

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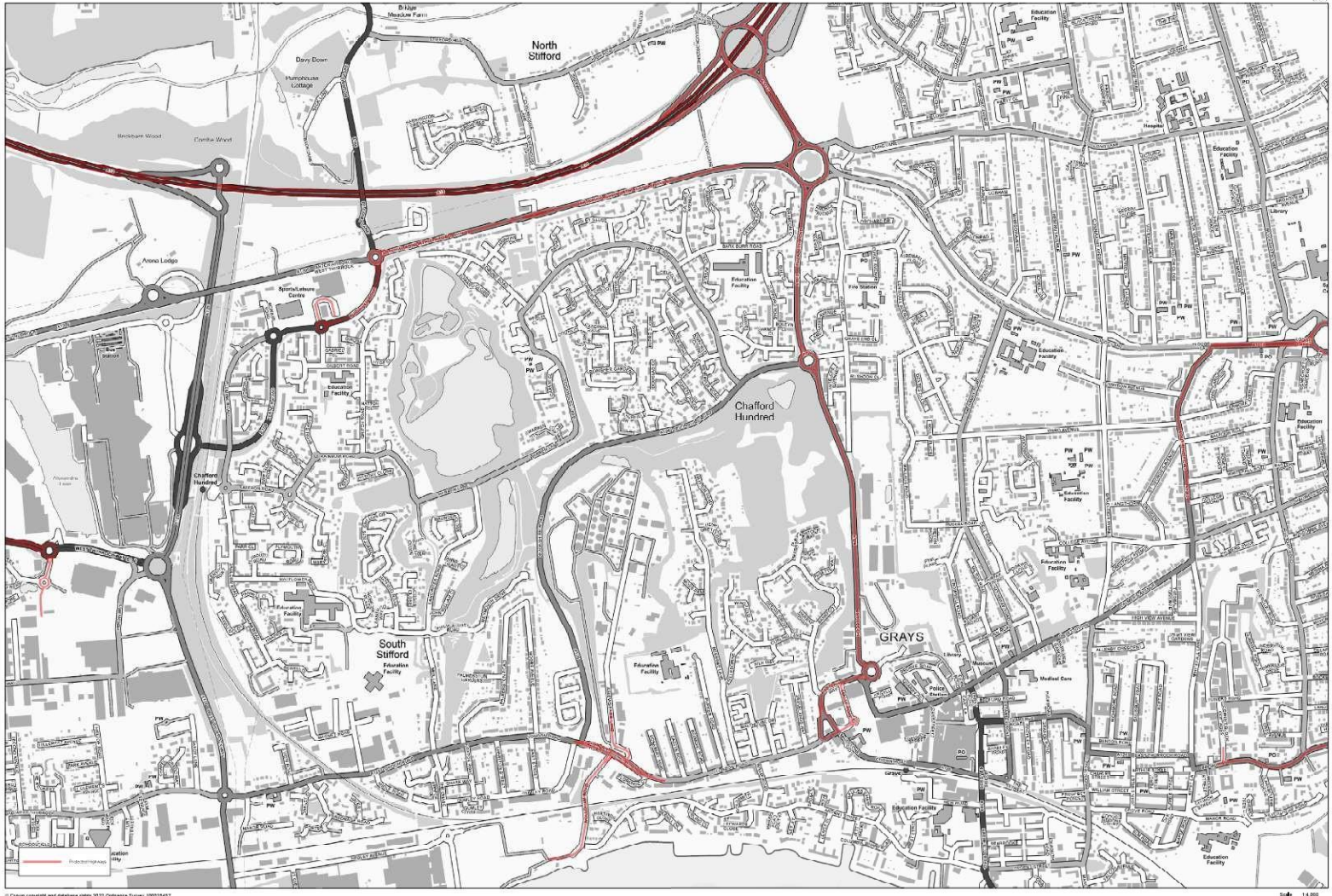








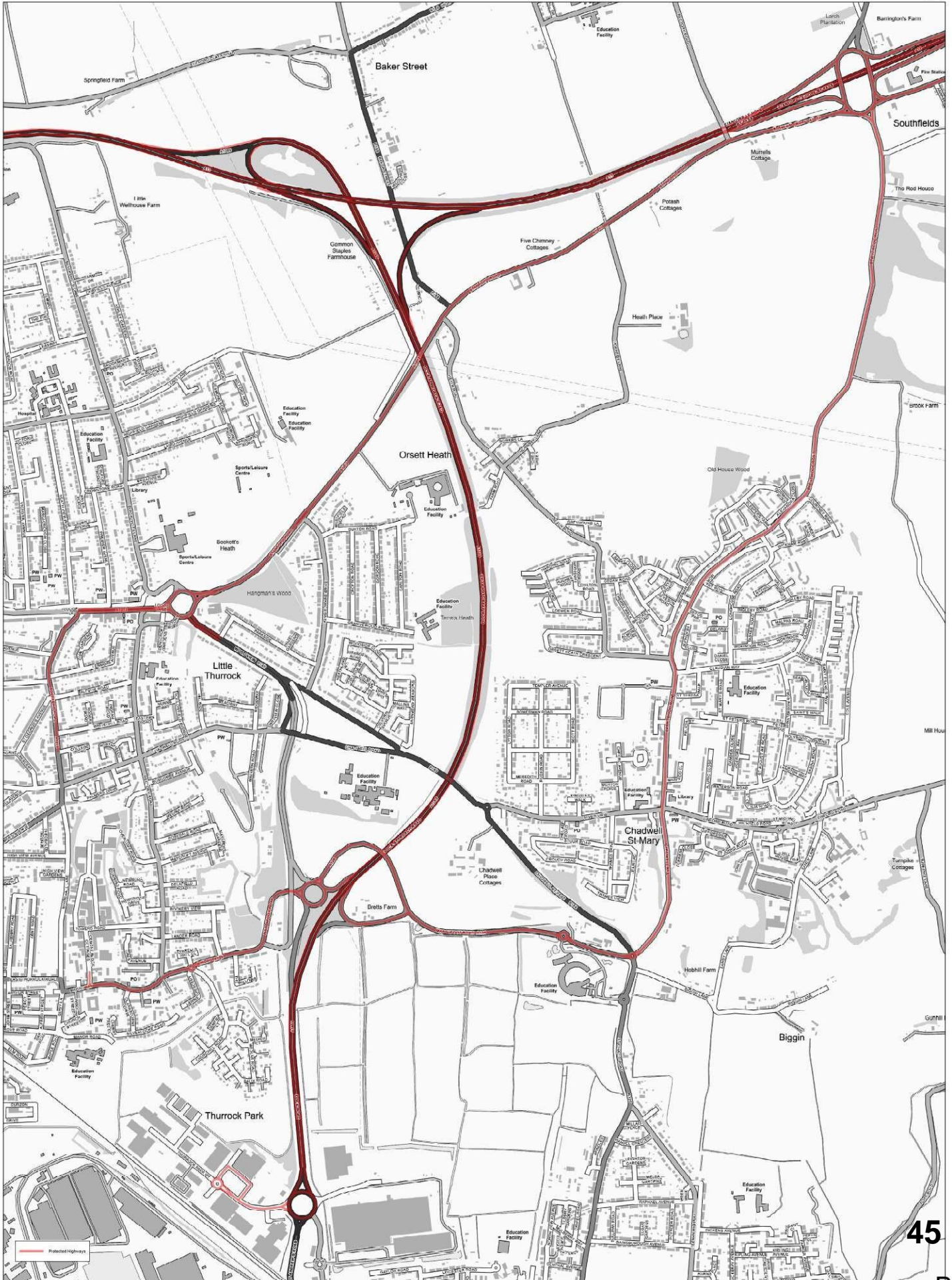




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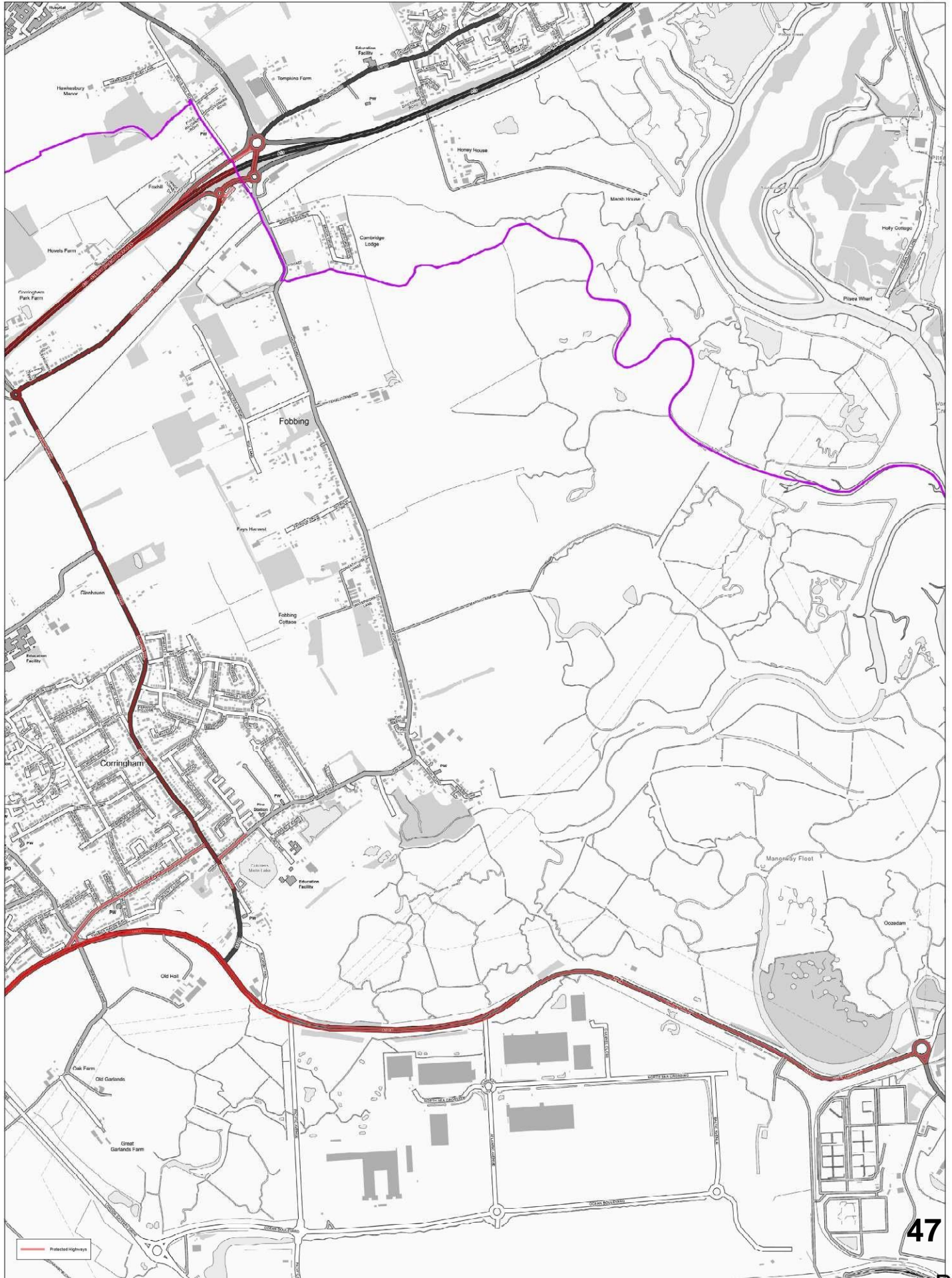












IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION

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)**

27 May 2022

Before His Honour Judge Simon (sitting as a Judge of the High Court)

**B E T W E E N :**

**(1) THURROCK COUNCIL**

**(2) ESSEX COUNTY COUNCIL**

**Claimants**

**-and-**

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**(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,  
CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN,  
OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH**

**48**

**VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS  
FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED  
ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)**

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WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY**

**Defendants**

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**ANNEXE 3**

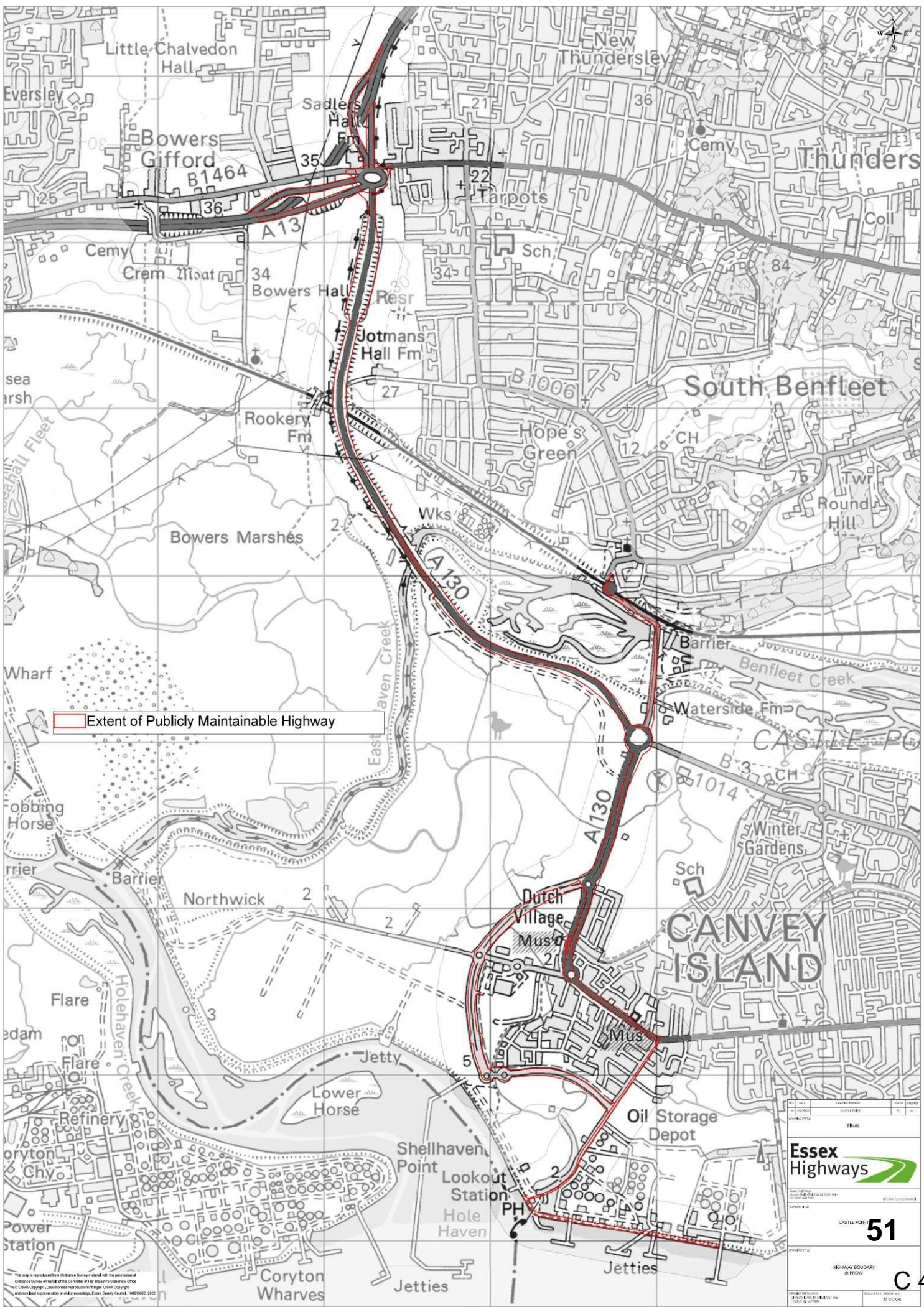
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Extent of Publicly Maintainable Highway

DATE	DESCRIPTION	BY	FOR
14/05/2014	FINAL	ESSEX HIGHWAYS	ESSEX COUNTY COUNCIL
<b>Essex Highways</b>			
			
<b>CASTLE POINT 51</b>			
<b>HIGHWAY BOUNDARY &amp; FERRY</b>			
<b>C 4</b>			

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