

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

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL



QB-2022-001317
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

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

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.

INJUNCTION

Prohibitions

2. 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 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 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: juststopoilpress@protonmail.com;
youthclimateswarm@protonmail.com; press@extinctionrebellion.uk;
insulatebritainpress@protonmail.com

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).

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

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-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 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 Mychalecky
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 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
217. Thomas Winter
218. Carol-Ann Wood
219. Lizia Woolf
220. 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
253. Samuel Johnson
254. Sarah MacDonald
255. Seiriol Davies

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

SCHEDULE 2 – POWER OF ARREST

Power of arrest

| | |
|---|------------------------------------|
| Name of court High Court of Justice King's Bench Division | Claim No. QB-2022-001317 |
| Claimant's name (including ref.) (1) Thurrock Council (2) Essex County Council | |
| Defendant's name (including ref.) (223)-(229) Persons Unknown | |

Name of defendant

(1) Madeline Adams
(2)-(222) Other Named Defendants

Defendant's address

See attached continuation sheet



Date order made 12/07/2024

Name of judge Mr Justice Julian Knowles

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 Mr Justice Julian Knowles dated 12 July 2024 (see attached continuation sheet)

This power of arrest was ordered on 12/07/2024 **and expires on the** 11/07/2029

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)

Before the Honourable Mr Justice Julian Knowles
12 July 2024

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-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

| | |
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| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, | 225 |

| | |
|---|-----|
| 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) | |
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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 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

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)

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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 | 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
 ROUNDABOUT KNOWN AS THE WATERSIDE ROAD ROUNDABOUT

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

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

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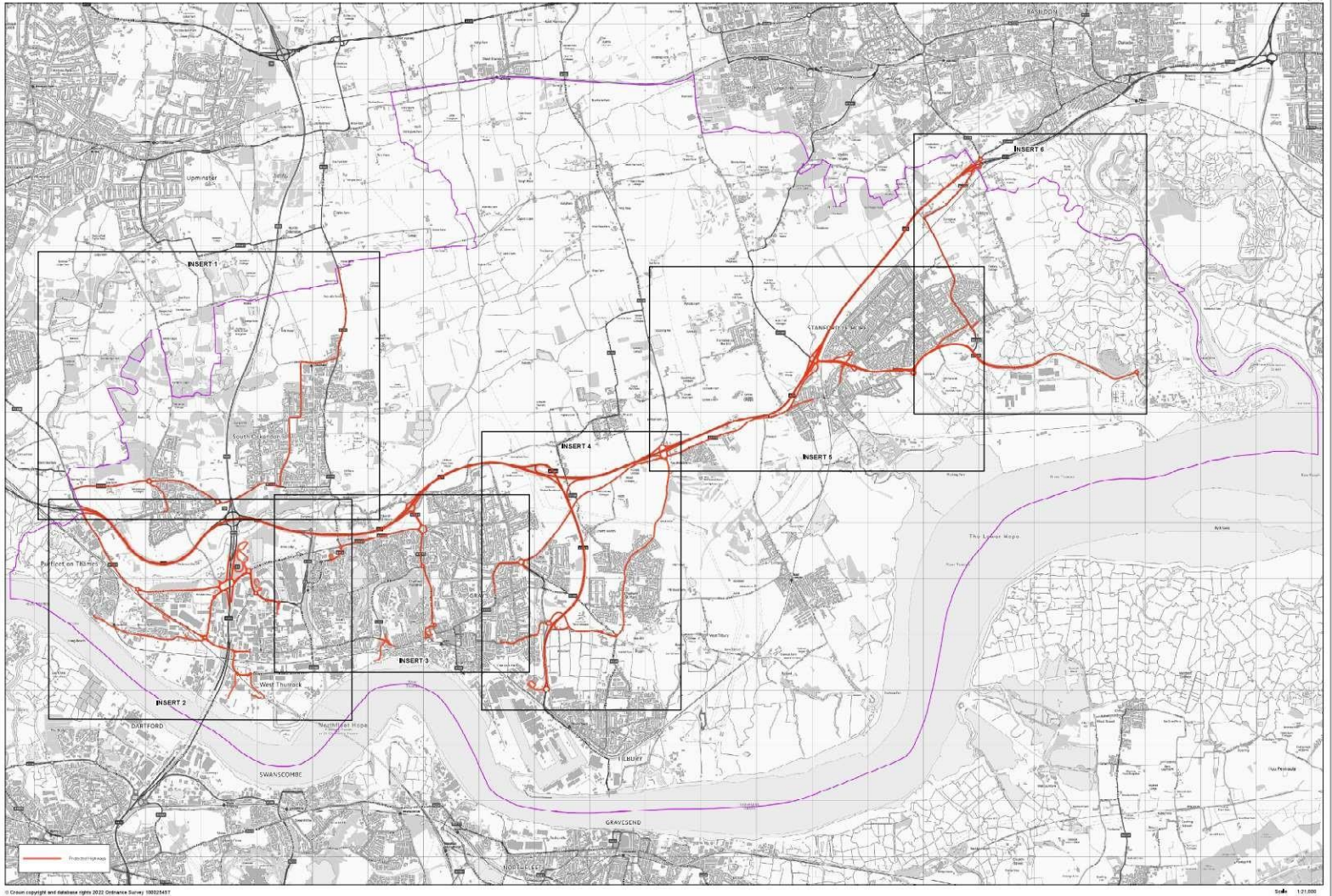
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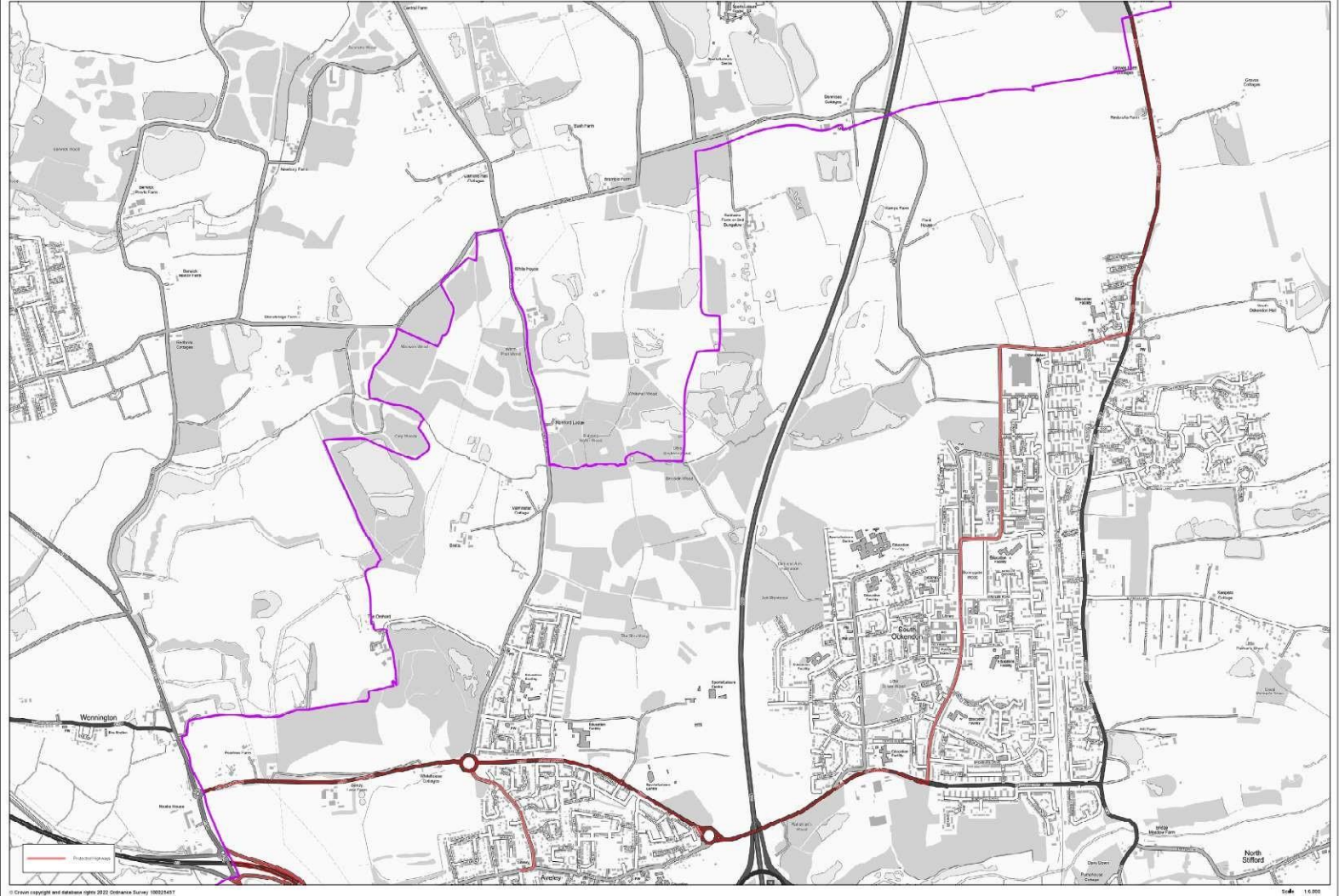
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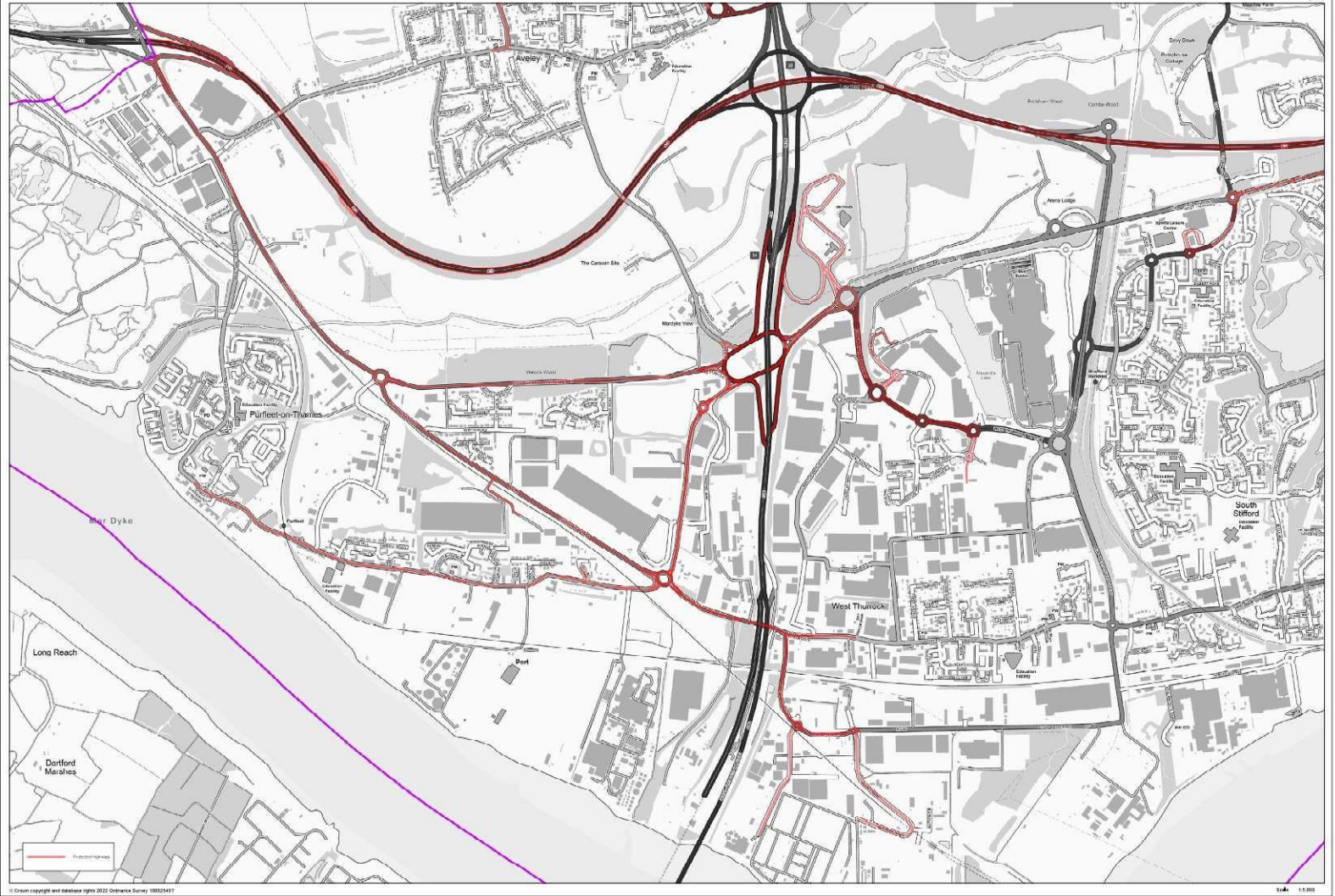
(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

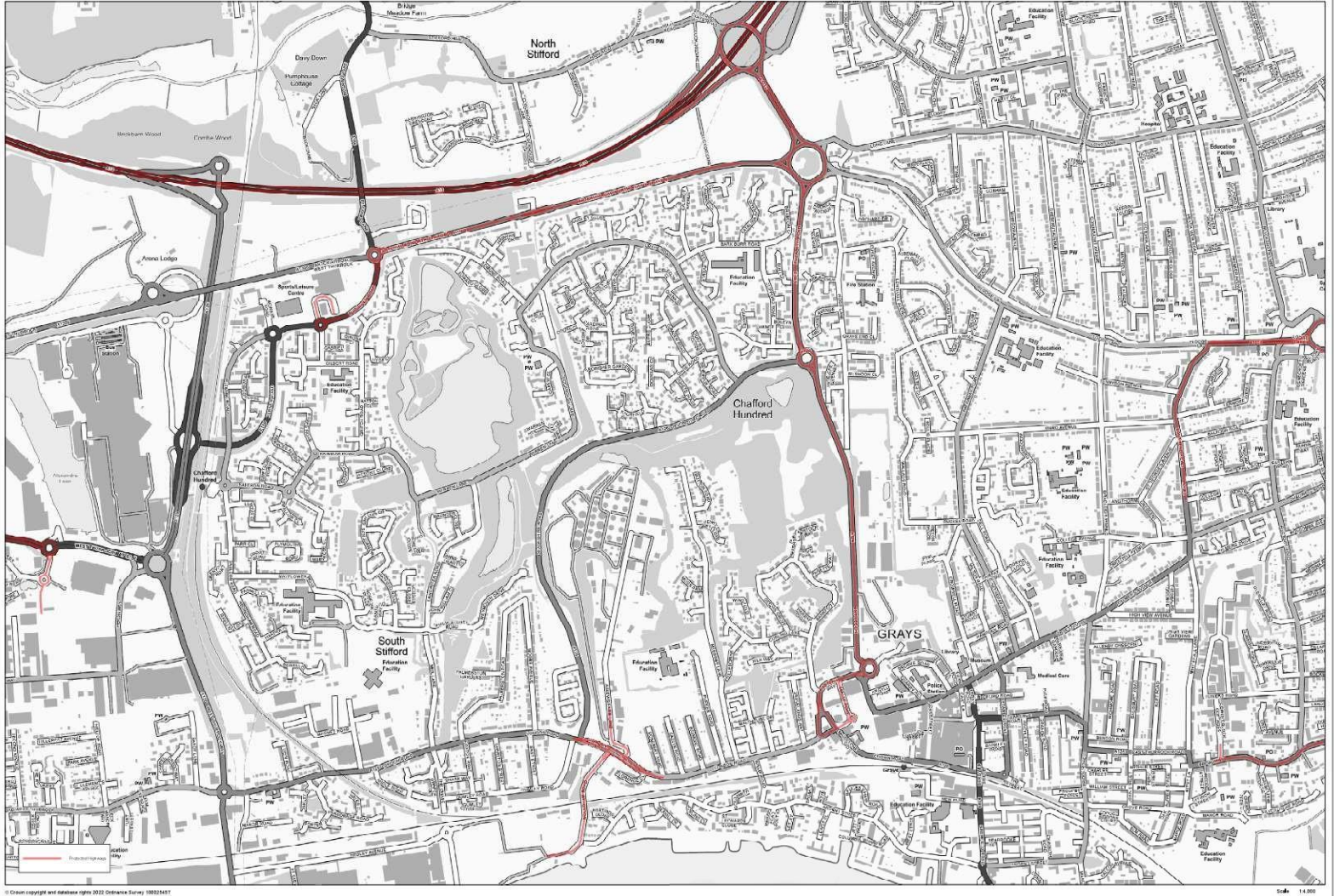
Defendants

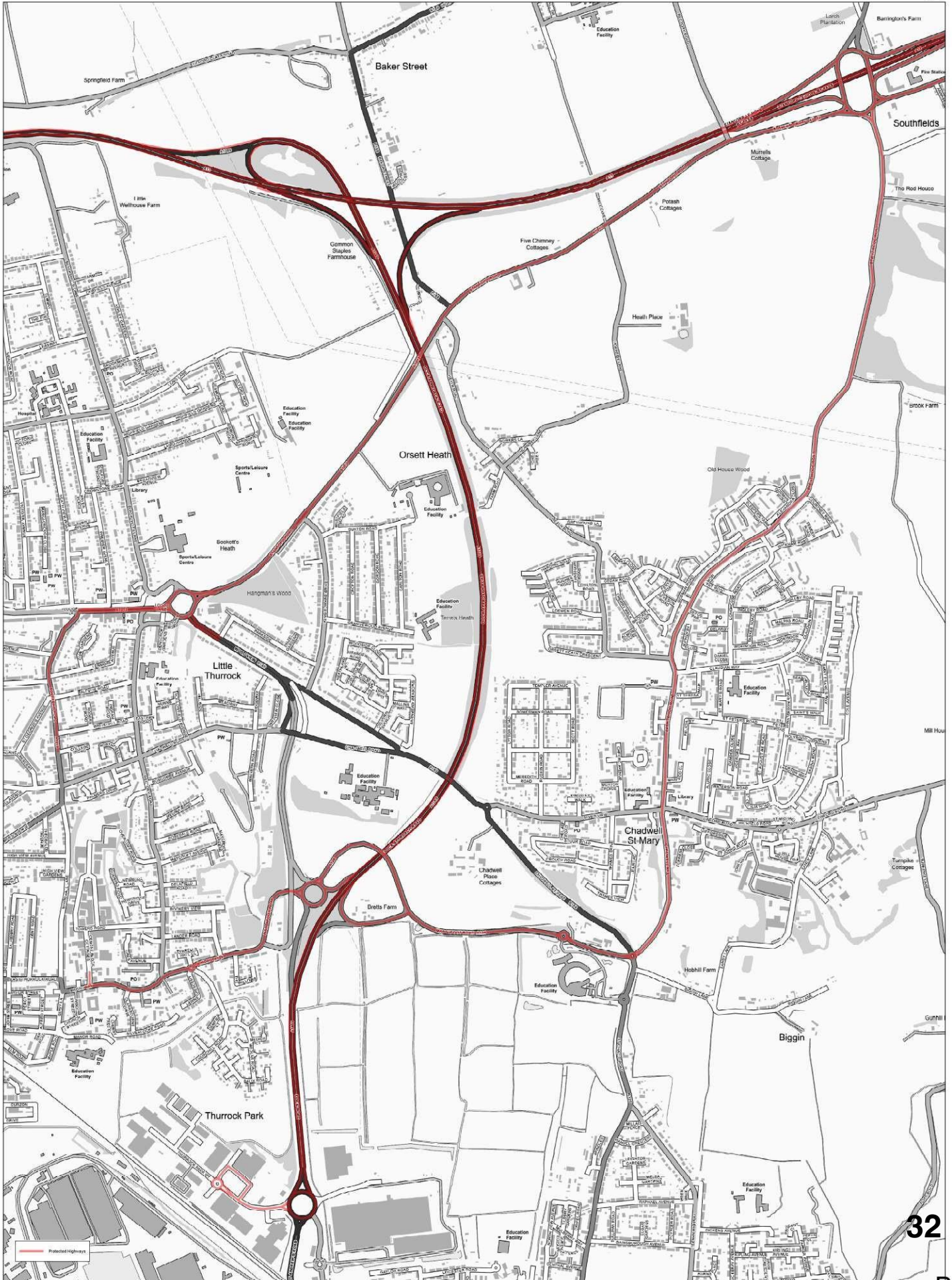
ANNEXE 2



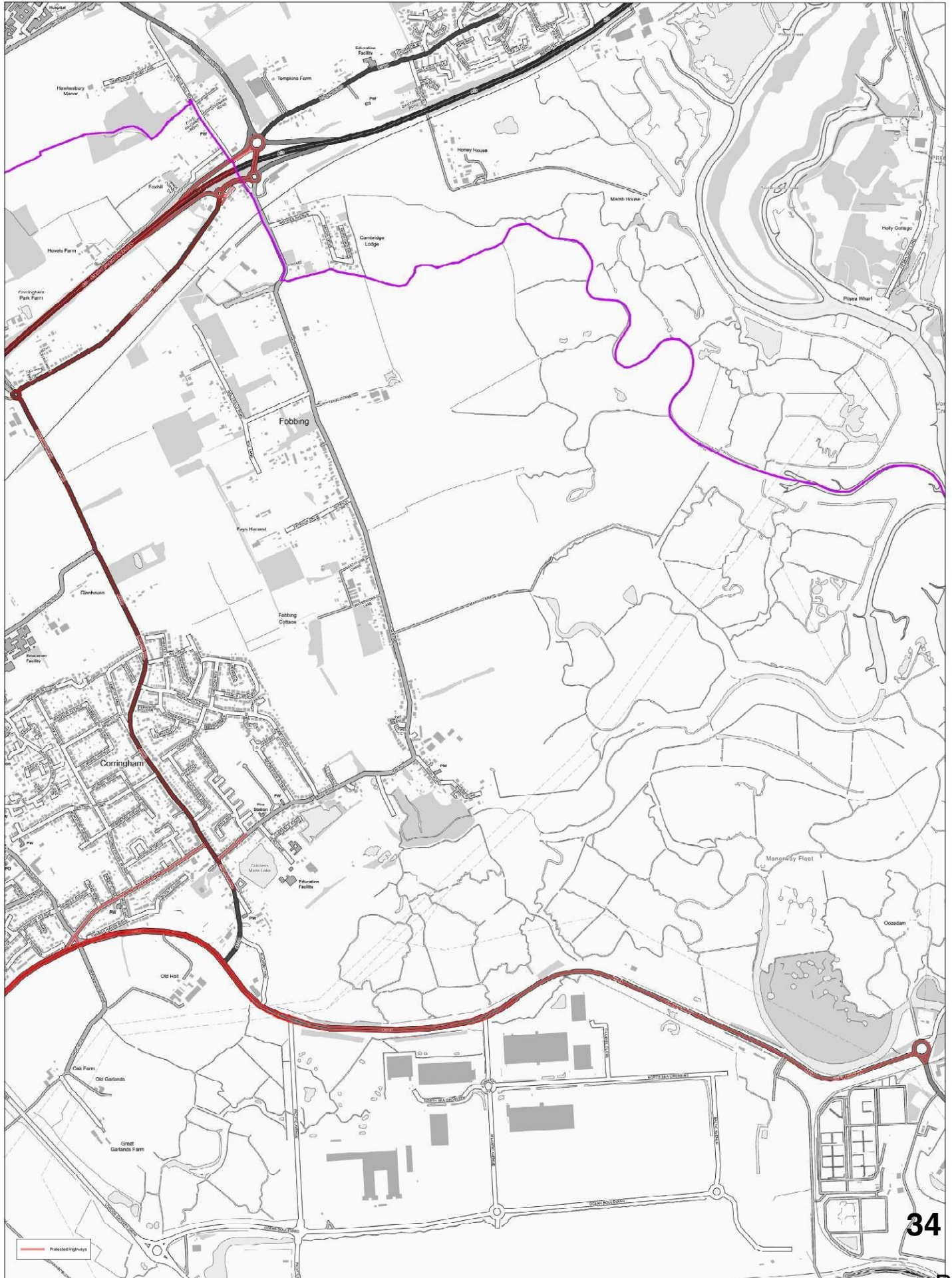












In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles
12 July 2024

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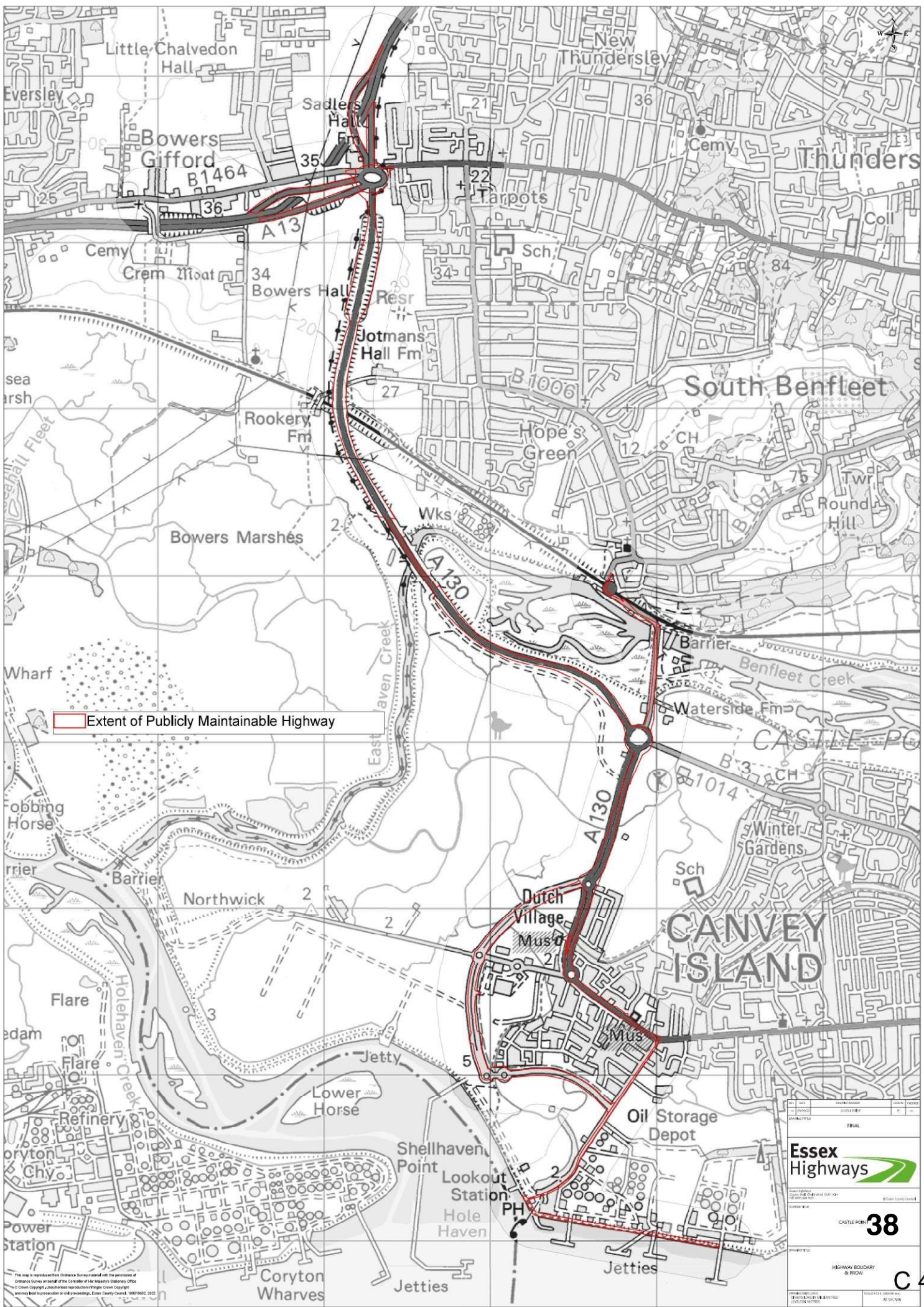
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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

Defendants

ANNEXE 3





Extent of Publicly Maintainable Highway

| | | | |
|-------------------------------------|-------------|-------------------------------|----------------|
| DATE | DESCRIPTION | BY | FOR |
| 14/05/2014 | FINAL | ESSEX HIGHWAYS | ESSEX HIGHWAYS |
| Essex Highways | | | |
| | | | |
| CASTLE POINT 38 | | | |
| HIGHWAY BOUNDARY & FERRY | | | |
| <small>ESSEX HIGHWAYS</small> | | <small>ESSEX HIGHWAYS</small> | |

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