

[01st September 2025]

Claim No. QB-2022-001317

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

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)-(229) VARIOUS DEFINED CATEGORIES OF PERSONS UNKNOWN

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

Defendants

FIFTH WITNESS STATEMENT OF ADEWALE ADESINA

I, **Adewale Adesina**, of Thurrock Council, Civic Offices, New Road, Grays, Essex RM17 6SL, will say as follows –

1. I am an officer of the First Claimant, Thurrock Council, in the role of ‘Emergency Planning & Resilience Manager’. My role and responsibilities at the Council include co-ordinating the Council’s response to major and emergency incidents that occur within Thurrock Council’s administrative area. I am authorised by the Claimants to make this witness statement on their behalf.

2. I make this witness statement in accordance with paragraph 7 of the Order of Bourne J dated 30 October 2024 (the '**Final Injunction Order**'). That paragraph lists the hearing of a review of the Final Injunction Order against the Named Defendants, and requires that the Claimants' evidence to be relied upon at that hearing shall be filed and served by 4 September 2025. To confirm, the Claimants seek the continuation of the Final Injunction Order against the Named Defendants. I exhibit a copy of the Final Injunction Order at **AA5/1**.
3. The facts and matters set out by me in this witness statement are either known by me directly and are true, or are known by me indirectly and are believed to the best of my knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief. This statement was prepared through email correspondence and in conference with the Claimants' legal representatives.
4. There is exhibited to this statement a bundle of documents marked 'AA5'. Where I refer to documents contained in that bundle I do so in the format [**AA5/exhibit number**].
5. In this statement I shall address:
 - i. Background and chronology;
 - ii. Order sought at this hearing;
 - iii. Just Stop Oil 27 March 2025 announcement;
 - iv. Apprehension of further protest;
 - v. Miscellaneous.

BACKGROUND AND CHRONOLOGY

6. The Claimants brought the Claim pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5). Thurrock Council ('**Thurrock**') is the Local Highway Authority for the Borough. Essex County Council ('**ECC**') is the Local Highway Authority for the County.
7. The Claim was brought in response to protest activity in the administrative area of Thurrock (the '**Borough**') in April 2022 by those associated with the Just Stop Oil group. The

Borough is especially attractive to this group as a venue for protest as it houses several COMAH (Control of Major Accident Hazards) sites, namely fuel/oil terminals. The Oikos fuel terminal is also located in nearby Canvey Island, which is within the administrative area of Essex (the ‘County’).

8. On 24 April 2022, the Claimants made an out of hours and without notice application for interim injunctive relief against (i) the 222 named Defendants set out at Schedule 1 to the Claim Form, and (ii) the seven categories of Persons Unknown. The Application was heard by Ritchie J, who made the Order at **AA5/2**.
9. In summary, the injunction order:
 - i. restrained acts of public nuisance (that being the obstruction of the highway) in Borough;
 - ii. restrained acts of trespass (and particularly the act of tunnelling under or adjacent to the highway) in the Borough; and
 - iii. restrained apprehended acts of public nuisance (that being the obstruction of the highway) and trespass in the County.
10. Following the return date hearing, HHJ Simon (sitting as a Judge of the High Court) continued the injunction by way of the Order dated 27 May 2022, exhibited at **AA5/3**.
11. The final hearing of the Claim was adjourned by way of the Order of Foster J dated 26 January 2023, exhibited at **AA5/4** (which Order also continued the power of arrest and the injunction, including against Persons Unknown). That adjournment was ordered on the application of the Claimants given the imminent hearing of the appeal to the Supreme Court in *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors*, the outcome of which would almost certainly impact upon these proceedings.
12. The Supreme Court handed down judgment in the *Wolverhampton* appeal on 29 November 2023, upon which the Claimants wrote to the court in accordance with the Order of Foster J. By way of the Order of Jefford J dated 20 December 2023, exhibited at **AA5/5** the

Claimants were directed to by 27 March 2024 make all additional applications (if any) required to enable the trial to take place. A case management hearing was listed for 19 April 2024 to hear any extant applications and set directions to the final hearing.

13. At that case management hearing, Collins Rice J directed that a review of the injunction Order, in so far as it applied to Persons Unknown only, should take place, and listed a hearing for 12 July 2024. A copy of the Order is exhibited at **AA5/6**. Collins Rice J decided that the Claim against the Named Defendants should be managed and disposed of separately, as significant progress was being made in settling the proceedings against the vast majority of the Named Defendants by way of undertakings to the court (including by several of those who were added as further Named Defendants at the case management hearing itself).
14. The review of the injunction Order in so far as it applied to Persons Unknown was heard on 12 July 2024 by Julian Knowles J, who granted a five-year injunction with an annual review. A copy of the Order is exhibited at **AA5/7**. The judgment was reported at **[2024] EWHC 2576 (KB)**.

The Final Injunction Order and the Costs Order

15. The final hearing of the Claim against the Named Defendants came before Bourne J on 9 October 2024, by which time only 27 out of 255 Named Defendants remained live in the proceedings following mass settlement. The Claimants discontinued the Claim against one Named Defendant at the hearing, and the Final Injunction Order (exhibited at **AA5/1**) was made against the remaining 26 Named Defendants. The 110th Defendant, Mr Charles Philip Laurie, instructed solicitors and was represented by counsel at the hearing.
16. The Final Injunction Order was made for five years, with annual review. Without waiving privilege, I understand from the Claimants' legal advisers that it is unusual for final orders against named defendants to be subject to annual review; ordinarily, only orders against Persons Unknown are subject to such review. The judgment was reported at **[2024] EWHC 2750 (KB)**. The only mention of the review requirement in the judgment is in the final paragraph (para 93), in which the Judge says “[i]n line with the order in respect of unnamed

defendants, my order will continue for 5 years from the date of the hearing and will be subject to annual reviews”.

17. The Claim and application for injunctive relief sought costs against the Named Defendants. Upon giving judgment, Bourne J gave directions for the filing of further written submissions on the question of costs, following which the Order dated 5 December 2024 and exhibited at AA5/8 was made (the ‘**Costs Order**’). The Costs Order provided that the 26 Named Defendants against whom the Final Injunction Order was made were to pay 60% of the Claimants’ costs on the standard basis to be assessed if not agreed (to be apportioned between the remaining Named Defendants). Further, each Named Defendant was to make a payment on account of costs in the sum of £2000 by 4pm on 19 December 2024.
18. I am informed by the Claimants’ legal representatives that the Costs Order was served by way of first-class post on 6 December 2024 (where an address was known for a Named Defendant, which applies to most of the remaining Named Defendants) and/or by email where a Named Defendant had previously indicated that was their preferred method of contact and service. I exhibit an example of the covering letter that accompanied the Costs Order at AA5/19. The covering letter specifically drew attention to the payment on account of costs that had been ordered, and provided the bank details to which payment should be made. The First Claimant’s in house legal representatives also sent the Costs Order (and relevant bank details) by email to the email addresses of the various protest groups at which service is ordinarily effected, and the Costs Order was uploaded to the injunction website in the usual way (even though the Order did not relate to Persons Unknown).
19. I am informed by the Claimants’ legal representatives that the 110th Defendant (Mr Laurie) has made the payment on account as ordered. I am further informed that the 237th Defendant (David Nixon) is making regular, yet very small (and decreasing) payments, towards the payment on account; however, the payments are so small that it would take nearly 33 years for the principal sum to be paid, and that’s not accounting for any interest. No other Named Defendant has attempted to make payment.
20. I am informed by the Claimants’ legal representatives that the only other responses that have been received to the service of the Costs Order are:

- i. a short exchange of correspondence between the 189th Defendant (Hannah Skwarska) between 15 and 20 December 2024. I exhibit those emails at **AA5/20**. Ms Skwarska alleges not to have received any prior communication in relation to the injunction proceedings (but does not explain how she came to know of the Costs Order), and alleges that she did not live at the address being used for service (even though that address was obtained from Essex Police and was the address that she herself provided to them upon her arrest, as explained at the outset of these proceedings, and I am informed by the Claimants' legal representatives that they are not aware of any posted documents having been returned to sender). Ms Skwarska alleged that she could not make the payment on account of costs, and also said that she did not intend to breach the Final Injunction Order; and
 - ii. a short letter dated 19 December 2024 from the parents of the 70th Defendant (Cressida Gethin), which simply stated that the address used was her parents' address, and that it was being used for correspondence as she was currently serving a four-year prison sentence. I exhibit a copy of that letter at **AA5/21**.
21. In the circumstances, the Claimants have not elected to incur further costs and commence detailed assessment as yet. The Claimants have already spent significant public funds on this Claim, and can only justify spending further sums if there is likely to be a return on that expenditure.

The review of the Order against Persons Unknown

22. In accordance with the Order of 12 July 2024 granted by Julian Knowles J, the injunction Order against Persons Unknown was to be reviewed no later than 11 July 2025, unless the Claimants indicated to the court that they did not seek continuation of the Order.
23. The Claimants did not seek the continuation of the injunction Order against Persons Unknown, which expired at 23:59 on 11 July 2025. On the application of the Claimants, an order reflecting the expiration and vacating the review hearing was made by Lambert J on 2 July 2025 (exhibited at **AA5/9**).

24. In summary, the Claimants' reasons for not seeking the continuation of the Persons Unknown Order were:

- i. no incidents of protest had occurred in the Borough since September 2022. Whilst that was likely to be, at least in part, because of the efficacy of the injunction Order, the Claimants were also mindful of (ii) below;
- ii. Just Stop Oil had made an announcement that they were 'hanging up the hi-vis'. Whilst this announcement was somewhat equivocal (as shall be explained below), the Claimants were mindful of the combined effect of (i) and (ii), especially in relation to Persons Unknown (as compared to the Named Defendants, who could offer undertakings and make representations as to their own intentions);
- iii. the Claimants pursued the Claim in the discharge of their public functions and expended public funds in doing so. Those funds are limited, and must be deployed where they are most needed. In circumstances where there was an arguable case that there may no longer be a need to protect the highways from acts of unlawful direct-action protest by Persons Unknown, and various private entities also have injunctions to protect their land and facilities, the Claimants felt that the resources that would otherwise have been used in seeking continuation and the ongoing management and monitoring of the injunction could be better deployed elsewhere for the benefit of the inhabitants of the Borough;
- iv. Essex Police has concluded its own response to the mass Just Stop Oil protests.

25. If further acts of unlawful direct-action occurred following the discharge of the Persons Unknown Order, the Claimants were prepared to consider again exercising their public functions to restrain those acts if the circumstances necessitated that.

ORDER SOUGHT AT THIS HEARING

26. The Claimants take a different view in relation to the Final Injunction Order against the Named Defendants, and seek the continuation of the Order. Continuation is sought because:

- i. no Named Defendant has sought to vary or discharge the Order over the past year, or offer an undertaking. If the Named Defendants were genuinely ‘hanging up the hi-vis’, as announced by Just Stop Oil (see further below), they could have activated the liberty to apply in the Final Injunction Order and seek variation or discharge of the Final Injunction Order (whether in exchange for an undertaking or otherwise). No Named Defendant has done so;
- ii. one Named Defendant (D110 Charles Philip Laurie) has made the payment on account of costs Ordered by Bourne J. One further Defendant (D237 David Nixon) is making small monthly payments towards the same costs order. No other Named Defendant has made or attempted to make any payment towards the Costs Order. That failure shows a general disregard for court orders, and is indicative of the attitude of the Named Defendants against whom the Final Injunction Order was made; relatedly
- iii. of the Named Defendants against whom the Final Injunction Order was made, only the 110th Defendant, Mr Laurie, engaged with the proceedings. Even his participation was belated (I am informed from the Claimants’ legal representatives that the first contact from Mr Laurie was in September 2024). That failure to participate again shows a general disregard for the court, the Claim and the rights of the Claimants and the inhabitants of the Borough, and is indicative of the attitude of the Named Defendants against whom the Final Injunction Order was made;
- iv. the Final Injunction Order is anomalous. Without waiving privilege, I am informed by the Claimants’ legal advisers that other protest (or Traveller) injunctions that apply to named defendants are not subject to annual review – only the Persons Unknown portions of such orders are subject to review, as required by the Supreme Court in *Wolverhampton*. Rather, I am informed by the Claimants’ legal representatives that the norm is for a named defendant protest injunction to be made simply for five years and, if there is a change of circumstances which causes a named defendant to consider that the order has outlasted its need, it is incumbent on them to make an application to vary or discharge if so advised (the Claimant not being subject to the same onerous duties as it (rightly) is in relation to a claim

against Persons Unknown). Accordingly, the Final Injunction Order should simply have been made for five years, without review;

- v. the evidence presented at the final hearing in October 2024 showed that many of the Named Defendants had a propensity to commit acts of unlawful direct-action protest. I refer specifically to my fourth witness statement dated 7 August 2024 in this regard, at paragraphs 29 to 50.

JUST STOP OIL 27 MARCH 2025 ANNOUNCEMENT

27. On 27 March 2025, Just Stop Oil published a press release titled ‘Just Stop Oil is hanging up the hi vis’. I exhibit a copy of the press release, as published on the group’s website, at **AA5/10**. Notable extracts from the statement include:

- i. *“Three years after bursting on to the scene in a blaze of orange, at the end of April we will be hanging up the hi vis”;*
- ii. *“So it is the end of soup on Van Goughs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison... Just Stop Oil will continue to tell the truth in the courts, speak out for all political prisoners and call out the UK’s oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen”;*
- iii. *“This is not the end of civil resistance”;*
- iv. *“As corporations and billionaires corrupt political systems across the world, we need a different approach. We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Nothing short of a revolution is going to protect us from the coming storms”;* and
- v. *“We are calling on anyone who wants to be part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. Sign up here. See you on the streets”.*

28. In the ‘Notes to Editors’ that accompany the press release, the two following statements appear (amongst others):

- i. *“Just Stop Oil is committed to nonviolent direct action to resist the destruction of our communities as a result of climate breakdown. We do not consent to plans that will result in 3C of warming and mass death”*; and
- ii. *“We demand an emergency plan to Just Stop Oil by 2030. Our government must work with other governments to end the extraction and burning of all oil, gas and coal by 2030”*.

29. As I have mentioned above, the press release is equivocal. On the one hand, it states that the group will be ceasing its established programme of direct action. On the other hand, it doubles down on the need for direct-action to effect further desired change. It is far from clear what the group’s actual intentions are from this press release.

30. On 25 April 2025, Just Stop Oil published a press release titled ‘Just Stop Oil: “Resistance Works and we’re just getting started”’. I exhibit a copy of the press release, as published on the group’s website, at **AA5/11**. The press release explains that the ‘celebration’ march to ‘honour’ activists who have participated in the group’s activities will be taking place the next day, and quotes a Just Stop Oil spokesperson as making the following comments (amongst others):

- i. *“We know that resistance is needed now more than ever, so we’re just getting started”*;
- ii. *“The fascists are coming... Nothing short of a revolution is going to stop this”*; and
- iii. *“We are also building a new street movement rooted in local communities and dedicated to nonviolent civil resistance on a scale that Just Stop Oil never even dreamt of. Help put people on the streets by funding the next phase of civil resistance at juststopoil.org/donate”*.

31. In the ‘Notes to Editors’ that accompany the press release, the following statement again appears (amongst others):

Just Stop Oil is committed to nonviolent direct action to resist the destruction of our communities as a result of climate breakdown. We do not consent to plans that will result in 3C of warming and mass death.

32. Again, whilst the Notes to Editors contains the statement “*April 26th is the last Just Stop Oil action*”, the press release is equivocal. It is clear that the group intends to undertake further actions and is actively putting together that programme of action. It is far from clear that Just Stop Oil will be ceasing its activities and, if anything, the opposite appears to be more likely.

33. I also exhibit at **AA5/12** a copy of the Just Stop Oil website homepage as it stands on 28 August 2025. Front and centre of that home page is bold text that reads as follows:

***JUST
GETTING
STARTED***

Along with the following caption:

Nothing short of a political and economic revolution is going to get us out of this mess. We’re just getting started.

See you on the streets.

34. A link reading ‘SIGN UP TO OUR NEXT CAMPAIGN’ then appears. Clicking on that link takes you to the webpage exhibited at **AA5/13**, which produces a form for visitors to the webpage to fill in to ‘help build the revolution’.

35. Social media posts made by Just Stop Oil also tend to suggest that action has not ceased. Examples include the following (which are not exhaustive):

- i. Just Stop Oil posted to its Instagram page on 26 April 2025. The four accompanying images contain the same text as was quoted from the Just Stop Oil spokesperson in the 25 April 2025 press release referred to above. The accompanying caption states, amongst other things “*no one is coming to fix it unless we do it for ourselves. We are building a revolution. Help fund the next phase of civil resistance...*”. I exhibit the post and images at **AA5/14**;
 - ii. Just Stop Oil made three posts to its Instagram page on 19 May 2025. The three images when taken together made a banner which read “JUST GETTING STARTED”. Each post was accompanied by a caption, which included statements such as “[i]t’s Official: *We’re JUST GETTING STARTED*”, “[n]othing short of a political and economic revolution will get us out of this mess” and “[f]und the next phase of resistance and help build a political and economic revolution” I exhibit the three posts and images at **AA5/15**; and
 - iii. Just Stop Oil made three posts to its Instagram page on 4 June 2025. The three images when taken together made a banner which read “HELP BUILD THE REVOLUTION”. Each post was accompanied by a caption, which included statements such as “*JUST GETTING STARTED*”, “[n]othing short of a political and economic revolution will get us out of this mess” and “[f]und the next phase of resistance and help build a political and economic revolution” I exhibit the three posts and images at **AA5/16**.
36. The equivocal nature of the March 2025 announcement has been explored and accepted at the 2025 review hearings of many protest injunctions that were primarily aimed at Just Stop Oil protests. I understand that counsel for the Claimants will take the court to these cases at the review hearing, but that the most recent example in which a written judgment is available is ***Esso Petroleum Company Ltd v Persons Unknown* [2025] EWHC 1768 (KB)**. In that case, the Claimants had also obtained evidence from undercover reporting that suggested that Just Stop Oil was not disbanding and was plotting a comeback, which the group confirmed by email to its supporters (see paragraph 15). The court also noted that previous similar statements from other protest groups had not been honoured (paragraph 16).

37. In light of the above case, the Claimants have located two GB News articles which appear to reveal (without much specific detail) Just Stop Oil's plans for a come-back. I exhibit the article dated 18 May 2025 at **AA5/17** and the article dated 27 March 2025 at **AA5/18**.

38. Overall, the March 2025 announcement and surrounding press releases are far from convincing that direct-action will in fact cease and, as I have stated above, no Named Defendant has sought to vary or discharge the Final Injunction Order on that basis, which indicates that they do intend to engage in further action of that nature.

APPREHENSION OF FUTURE PROTEST

39. For the reasons that I have set out above, the Claimants continue to apprehend that, absent the Final Injunction Order, the Named Defendants restrained by that Order will commit further acts of unlawful direct-action protest in the Borough and County.

40. Further, even if it transpires that the Just Stop Oil announcement does in fact mark the end of the group's direct-action campaign, that does not necessarily mean that the Named Defendants will cease their own actions. The Named Defendants clearly have a strong belief in their cause and may align themselves with other similar direct-action groups, or undertake actions as a 'lone wolf'. To that end, in my fourth witness statement dated 7 August 2024, at paragraphs 29 to 50, I gave details of various other actions in which the Claimants understood some of the Named Defendants to have participated (thereby showing their propensity for such actions). It is notable that many of those actions were conducted under the banner of groups other than Just Stop Oil.

41. The strongest indication of whether a Named Defendant will or will not engage in unlawful direct-action is their own statement of their intentions. To that end, no Named Defendant has sought to vary or discharge the Final Injunction Order, offer an undertaking or (with the exception of the 110th Defendant, Mr Lawrie, who sought to defend at the eleventh hour) engage with the proceedings in any way. In the circumstances, an equivocal statement from Just Stop Oil cannot be taken as a statement of intent of the Named Defendants.

MISCELLANEOUS

42. Following the letter from the 70th Defendant's (Ms Gethin) parents, which advised that Ms Gethin was in prison, the Claimants' legal representatives have researched whether Ms Gethin does in fact remain in prison at the time of this review hearing. I am informed that Ms Gethin appealed her sentence, and it was reduced by the Court of Appeal from four-years to 30 months in a judgment dated 7 March 2025 (*R v Hallam* [2025] EWCA Crim 199).
43. It is notable that at paragraph 78 of the abovementioned judgment, the Court of Appeal explains that prior to the conviction in question, Ms Gethin had three previous convictions for offences committed during direct-action protest. The most recent had resulted in a suspended sentence, and her conviction had also placed her in breach of a conditional discharge. Ms Gethin clearly has a propensity for such actions, even in the face of coercive controls such as conditional discharges and suspended custodial sentences. Ms Gethin was also described in the judgment as a 'key organiser' of the direct-action protests (see paragraph 74). As such, the Claimants apprehend that if and when Ms Gethin is released from prison, she is likely to commit further acts of direct-action protest, including in the Borough; it is not clear when she will be released, but it is entirely possible that she could be released early – I note that Just Stop Oil have documented in a press release that another activist has recently been released from prison early because of current prison conditions AA5/22.
44. The 110th Defendant (Mr Laurie) served notice in late January 2025 informing the Claimants that his solicitors had ceased acting. To the Claimants' knowledge, Mr Laurie is now a litigant in person.

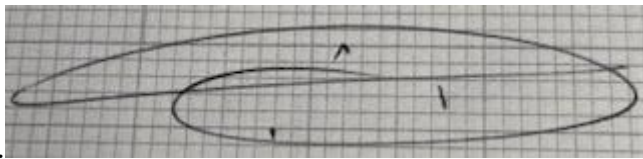
CONCLUSION

45. In all the circumstances, the Claimants seek the continuation of the Final Injunction Order against the Named Defendants. Different considerations and circumstances surround the Final Injunction Order against the Named Defendants as compared to the Persons Unknown injunction Order, such that a different approach has been merited by the Claimants, and continuation is sought.

46. Further, the Claimants seek continuation on the basis that no further annual reviews should be required, and the Final Injunction Order should simply continue until its expiry on 9 October 2029, subject to any variation or discharge that is ordered on the application of a Named Defendant. Counsel will address the court on this point at the review hearing, but my understanding from the Claimants' legal advisers (without waiving privilege) is that this will bring the Final Injunction Order into line with other similar orders of this nature.

Statement of Truth

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



Signed
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Adewale Adesina

Date: 01st September 2025