Claimants
Adewale Adesina
Third statement
Exhibit AA3/1-14
26.06.24

# 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)

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

## (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (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

	<b><u>Defendants</u></b>
EXHIBIT AA3/3	

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

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

26<sup>th</sup> January 2023 Before Mrs Justice Foster DBE

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL



-and-

## (1) MADELINE ADAMS

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

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

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

(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

	<b>Defendants</b>
ORDER	

### 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' Application dated 26 January 2023 seeking (i) the adjournment of the final hearing of the Claimants' Claim for final injunctive relief against the Defendants, pending the outcome of the expedited appeal to the Supreme Court in *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* (UKSC 2022/0046), which appeal may dispose of part of these proceedings, (ii) the continuation of the Injunction Order dated 27 May 2022 granted by HHJ Simon (sitting as a Judge of the High Court) (the 'Injunction Order'), pending the outcome of the aforementioned appeal and the final hearing of the Claimants' Claim and (iii) a 12 month extension to the power of arrest contained within the Injunction Order

**AND UPON** the Application being made on notice to those Defendants who have acknowledged service of the Claim and provided an address for service, as per paragraph 11 of the Injunction Order, and with the Application having also been served on the solicitors for the Sixty-Third Defendant and by way of email on the Forty-Eighth, Fifty-First, Eighty-Sixth, One-Hundred and Second and the One-Hundred and Fiftieth Defendants

**AND UPON** the Court considering the terms of the Injunction Order and the recitals thereto

**AND UPON** the Court considering the Fourth witness statement of Adam Rulewski dated 25 January 2023

AND UPON the Court considering the Application on the papers and without a hearing

#### 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: <a href="mailto:juststopoilpress@protonmail.com">juststopoilpress@protonmail.com</a>; <a href="mailto:juststopoilpress@protonmail.com">juststopoilpress@protonmail.com</a

- 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.

## Final hearing

12. The Claimants shall write to the Court within 28 days of judgment in the appeal of *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* (UKSC 2022/0046) being handed down (i) to inform the Court that judgment has been handed down and (ii) proposing directions to bring this Claim to final hearing. The Claimants shall copy that correspondence and the proposed directions to any Defendant who has acknowledged service of the Claim and provided an address for service.

#### Costs

13. Costs in the case.

#### **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;
  - (g) The fourth witness statement of Adam Rulewski dated 25.1.2023.
- 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
- John Johnson
- 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
- 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 Sidev
- 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

#### **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"

For service by text message:

"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**

#### N110A

## **Power of arrest**

Power of a	arrest	Name of court High Court of Justice King's Bench Division  Claim No.  QB-2022-001	
		Claimant's name (including r	ef.)
Name of defenda	nt	(2) Essex County Council	
(1) Madeline Adam (2)-(222) Other Na	ns	<b>Defendant's name</b> (including (1) Madeline Adams (2)-(222) Other Named Def	endants endants
Defendant's addr	229	(223)-(229) Persons Unkno	own
See attached con		judge Mrs Justice Foster DBL	JAN 2023 -
Date order made	2 6 / 0 1 / 2 0 2 3 Name of	judge Mrs Justice Foster DBE	BENCH DIV
Order made under (insert statutory provision)	Local Government Act 1972, s222 and Hi		
This order include	es a power of arrest under (insert statutory p	rovision)	
Police and Justice  The relevant para	graphs of the order to which a power of a	rrest has been attached are:	
	raphs of the order to which the power of arrest		
	2.16 of the Order of Mrs Justice Foster da		·
		and expires on the $\begin{bmatrix} 2 & 7 \end{bmatrix}$	0 5 / 2 0 2 4
Note to Arresting			
section 155 of the Ho Justice Act 2006; or se	is arrested under the power given by using Act 1996, or section 27 of the Police and ection 43 of the Policing and Crime Act 2009; or Social Behaviour, Crime and Policing Act 2014:-	Name of Claimant (1) Thurrock Council (2) Essex Council	
of 24 hours beginn	Il be brought before the judge within the period bing at the time of their arrest;	Claimant's address Sharpe Pritchard LLP	
injunction was gra under the power g	nform the person on whose application the nted, forthwith where the defendant is arrested iven by section 155 of the Housing Act 1996 or bly practicable where the defendant is arrested	Elm Yard 10-16 Elm Street London WC1X 0BJ	

Nothing in section 155 of the Housing Act 1996 or section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014, shall authorise the detention of the respondent after the expiry of the period of 24 hours beginning at the time of their arrest.

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.

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

Claimant's phone number

020 7405 4600

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

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)

26 January 2023 Before Mrs Justice Foster DBE

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

## (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
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- (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)

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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

	<b>Defendants</b>
POWER OF ARREST: CONTINUATION SHEET	

### NAMES AND ADDRESSES OF DEFENDANTS

Surname	Forename	Address	Defendant Number
ADAMS	MADELINE		1
ADAMS	MARY		2
ADDY	DAVID		3
ALEXANDER	AMBER		4
ALEXANDER	MINA-MAE		5
ANDERSON	ERIC		6

ASLETT	NICHOLAS	8
ASLETT	CHRISTINE	7
AYLES	LACHLAN	9
AYLETT	STEPHANIE	10
BAILEY	PETE	11
BAJWA	WILLIAM	12
BANKS	JEREMY	13
BARRINGTON	COLIN	14
BARTLETT	KAI	15
BATES	JOSHUA	16
BENNETT	CHRISTOPHER	17
BIRD	GILLIAN	18
BLANCO	JOHN	19
BLEWETT	JOHN	20
BLISS	POPPY	21
BOND	HILARY	22
BOULDEN	TREVOR	23
BOWMAN	GEOFFREY	24
BRAMWELL	SIMON	25
BREAM	JOSEPH	26
BREEN	SCOTT	27
BRETT	STEPHEN	28
BROCKLEBANK	EMILY	29
BROOK	CLAIRE	30
BROOKER	EMMA	31

BROWN	MICHAEL	32
BRUCE	JUDITH	33
BUDD	MADELEINE	34
BURNS	TES	35
BUSE	BENJAMIN	36
CANNON	CATHERINE	37
CASSAR	REBECCA	38
CAUSBY	JESSICA	39
CHAMBERLAYNE	SUSAN	40
CHAPMAN	SALLY	41
CHAUHAN	VISHAL	42
CHESTERMAN	KATHERINE	43
CLARKE	PHILIPPA	44
CLEGG	OLIVER	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	РНОЕВЕ	67
FRIEL	AMY	68
GARDNER	ROBIN	69
GETHING	CRESSIDA	70
GIBSON	ALASDAIR	71
GLASHIER	HUGO	72
GOLDER	STEPHANIE	73
GOLDRING	WILLIAM	74
GONZALEZ TRIMMER	XAVIER	75
GOODLAND	ALFIE	76
GOODWIN	EMMA-ROSE	77
GREENLAND	SOPHIE	78
GUNNING	AARON	79
HADDEN	LOUISA	80

HALLETT	CATHERINE	81
HALSALL	FINN	82
HANDLING	JAKE	83
HARPER	GARETH	84
HARRIS	LOUISE	85
HART	PATRICK	86
HAYWARD	YVONNE	87
HEIMEDINGER	SELMA	88
HERBERT	JONATHAN	89
HERFORT	NOAH	90
HETHERINGTON	SUZANNE	91
HIRONS	SARAH	92
HORLICK	RUPERT	93
HOWLETT	ADRIAN	94
HOYLAND	ERIC	95
HUBBUCKS	ABIGAIL	96
HUNT	HANNAH	97
IRELAND	EMMA	98
IVANOV	PAVEL	99
JANSEN	RIK	100
JARMAN	RUTH	101
JARVIS	STEPHEN	102
JARVIS	RUSSELL	103
JOHNSON	JOHN	104

JOHNSTON	HANNAH	105
JONES	TIMOTHY	106
KANN	PASCALE	107
KELLY	HALLUM	108
LATTER	LINDA	109
LAURIE	CHARLES	110
LAY	PETER	111
LAZARUS	EBEN	112
LEWIS	ISOBEL	113
LEWIS-HOLMES	ELANOR	114
LINHART	JOSEPH	115
LITTEN	EL	116
LOCKYER	REBECCA	117
LOZANO	FELIX	118
LUND	BARBARA	119
MACEY	JACQUELINE	120
MACLEAN	CATHERINE	121
MAIN	JACOB	122
MCCORMACK	ELIZABETH	123
MCFADDEN	EILIDH	124
MCGOVERN	NATHAN	125
MCKECHNIE	LOUIS	126
MCKIM	LILAH	127
MCMEEKIN	GRACE	128
MEANEY	ADALAIDE	129

MIDDLETON	ANNA	130
MILES	HANNAH	131
MITCHELL	DARCY	133
MITCHELL	BENJAMIN	132
MITCHELL	DEBORAH	134
MONROE	TEDDY	135
MOORE	FIONA	136
MOROSI	STEFANIA	137
MOROZZO	PAUL	138
MORRIS	VIRGENIA	139
MORRISON	PAUL	140
MULLEN	ZAK	141
MULVEY	ALEXANDRA	142
MYCHALECKYJ	REUBEN	143
NEWELL-PRICE	RICHARD	144
NEWMAN	BEN	145
NEWNHAM	ALEXANDER	146
NORGARD	JESSICA	147
NORRIS	RACHEL	148
NORRIS	ROSE	149
OAKENFOLD	GEORGE	150
ONLEY	NICHOLAS	151
PABINIAK	JAKUB	152
PAEZ	ELLA-ROSE	153

PAGE HALL	SOPHIE	154
PARFITT	SUSAN	155
PARSONS	DILLON	156
PATTERSON	ROSE	157
PAUL	ETHAN	158
PEARS	ROSALIND	159
PERCY-RATCLIFF	ABIGAIL	160
PETHICK	URSULA	161
PHILLIPS	JACQUELINE	162
PHILLIPS-WHITE	MITCHEL	163
POSSNETT	ROBERT	164
POWELL	MATTHEW	165
PRICE	ROBERT	167
PRICE	EMILY	166
PRITCHARD	AMY	168
REEVES- WHYMARK	FELIX	169
RETALLACK	ANNA	170
RICHARDS	ANNE	171
ROBERTS	BETHAN	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		193
SMYTH	JOSHUA		194
SQUIRE	DAVID		195
STEER	KATHERINE		196
STEVENS	OLIVER		197
STEWART	MADELEINE		198

SULEYMAN	FERDI	199
TALBOT	VIVIEN	200
TAYLOR	BEN	201
TEGGIN	JACQUELINE	202
TENQUIST	ZACHARY	203
THORNEYWORK	DAVID	204
TORRANCE- BRIGHT	HANNAH	205
TRINDER	LUCY	206
TROWLAND	MORGAN	207
VAN DER KNAAP	JAN	208
VANHOUTTEGHEM	RIK	209
WEBBER	SALLY	210
WEBER	LEONARD	211
WHELEHAN	MIRANDA	212
WHITE	PHILIP	213
WHITTINGHAM	EDRED	214
WILCOX	ALEXANDER	215
WILSON	CLARE	216
WINTER	THOMAS	217
WOOD	CAROL-ANN	218
WOOLF	LIZIA	219

KENNEDY	AMOREL		220
LALLY	GRACE		221
MORGAN	MORIEN		222
CAUSING THE BLOO OBSTRUCTING, PRE	CKING, ENDANGE EVENTING OR OTI AFFIC ON TO, OFF	THE PURPOSE OF PROTESTING, ERING, SLOWING DOWN, HERWISE INTERFERING WITH THE OR ALONG THE ROADS LISTED AT	223
AND WITHOUT THE VEHICLE, ENTERIN OR IN ANY WAY AF ANY VEHICLE TRA	E PERMISSION OF G, CLIMBING ON, FFIXING THEMSEI VELLING ON TO,	THE PURPOSE OF PROTESTING, THE REGISTERED KEEPER OF THE CLIMBING INTO, CLIMBING UNDER, LVES OR AFFIXING ANY ITEM TO OFF, ALONG OR WHICH IS S LISTED AT ANNEXE 1 TO THE	224
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PERSONS UNKNOW TO THE ROADS LIST UNDERTAKING EXC	N WHO ARE TRESTED AT ANNEXE CAVATIONS, DIGG	SPASSING ON, UNDER OR ADJACENT 1 TO THE CLAIM FORM BY GING, DRILLING AND/OR SSION OF THE RELEVANT HIGHWAY	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 Mrs Justice Foster DBE dated 26 January 2023:

- 2. The Defendants and each of them (whether by themselves or by instructing, encouraging or allowing any other person) are forbidden from:
  - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
  - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
  - 2.3 Entering, climbing onto, climbing into, climbing under any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
  - 2.4 Entering, climbing onto, climbing into, climbing under any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
  - 2.5 Affixing themselves ("locking on") to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.
  - 2.6 Affixing themselves ("locking on") to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the "locking on" is for the purpose of protesting.
  - 2.7 Affixing themselves ("locking on") or any other items to any of the Roads or any other person or object on, under or over the Roads.
  - 2.8 Affixing themselves ("locking on") or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the "locking on" is for the purpose of protesting.
  - 2.9 Erecting any structure on the Roads.
  - 2.10 Tunnelling, excavating, drilling or digging under or adjacent to the Roads.
  - 2.11 Occupying existing tunnels under the Roads for the purpose of protesting.
  - 2.12 Causing damage to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.
  - 2.13 Abandoning any vehicle or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.

- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station forecourt or access road, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by delivery tankers of fuel supplies and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.

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

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)

26 January 2023 Before Mrs Justice Foster DBE

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

## (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
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	<b>Defendants</b>
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	. 12
EASTBOUND	A13
STIFFORD ROUNDABOUT THE ACLE MINE BOLDER BOLDE	A1012
TREACLE MINE ROUNDABOUT LINK FROM A1012 ROUNDABOUT TO A1306 INTERCHANGE	A1012
	A1012
HOGG LANE	A1012
ELIZABETH ROAD	A1012
HOGG LANE ROUNDABOUT LONDON ROAD	A1012 A126
HOGG LANE ROUNDABOUT	A120 A1012
EASTERN WAY	A1012 A126
LAKESIDE INTERCHANGE TO NORTH STIFFORD ROUNDABOUT	A120
EASTBOUND	A13
NORTH STIFFORD ROUNDABOUT TO LAKESIDE INTERCHANGE	7113
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	711011
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 HIGH COURT OF JUSTICE KING'S BENCH DIVISION

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)

26 January 2023 Before Mrs Justice Foster DBE

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

### (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (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

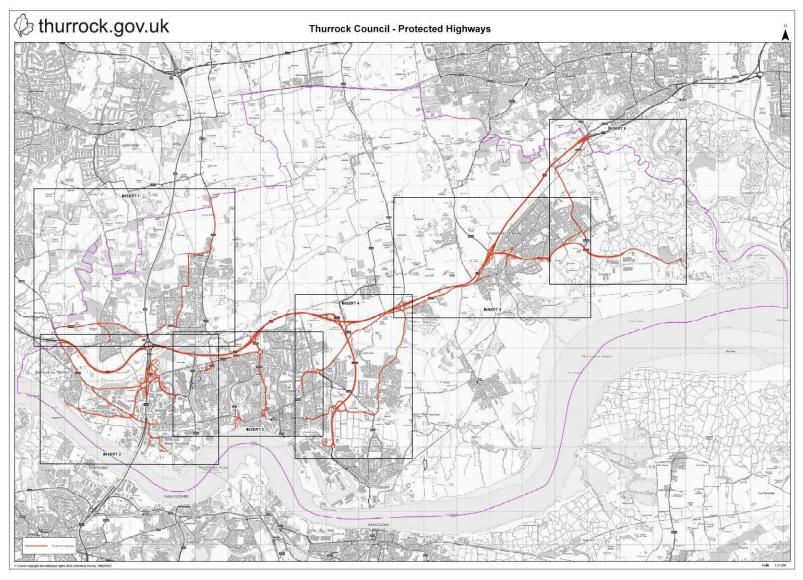
VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(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)

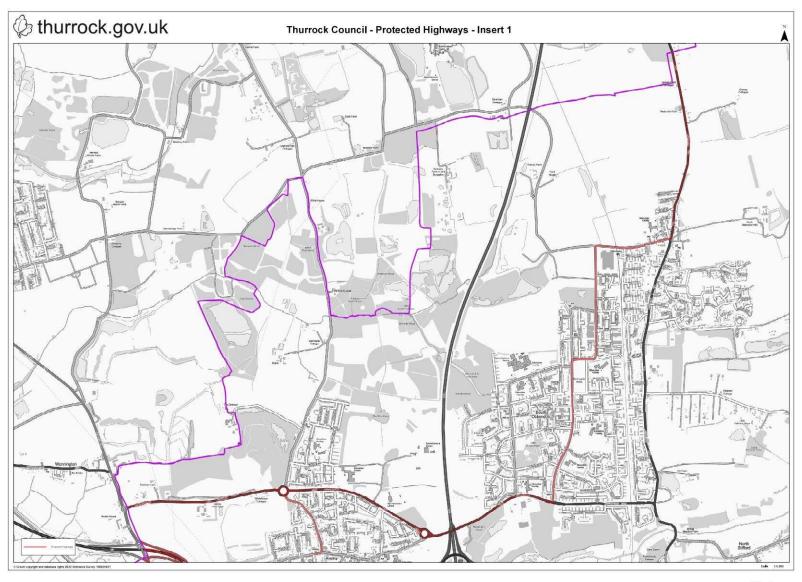
(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE 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

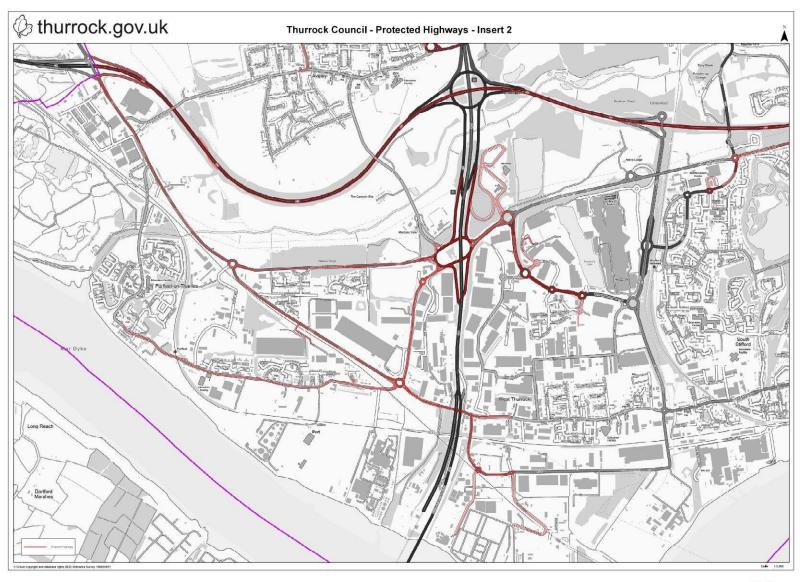
	<b>Defendants</b>
ANNEXE 2	



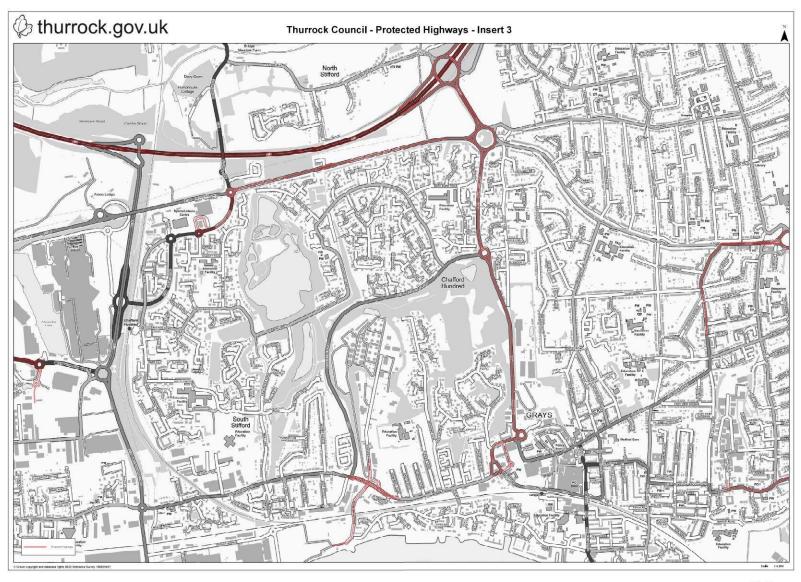
B 3



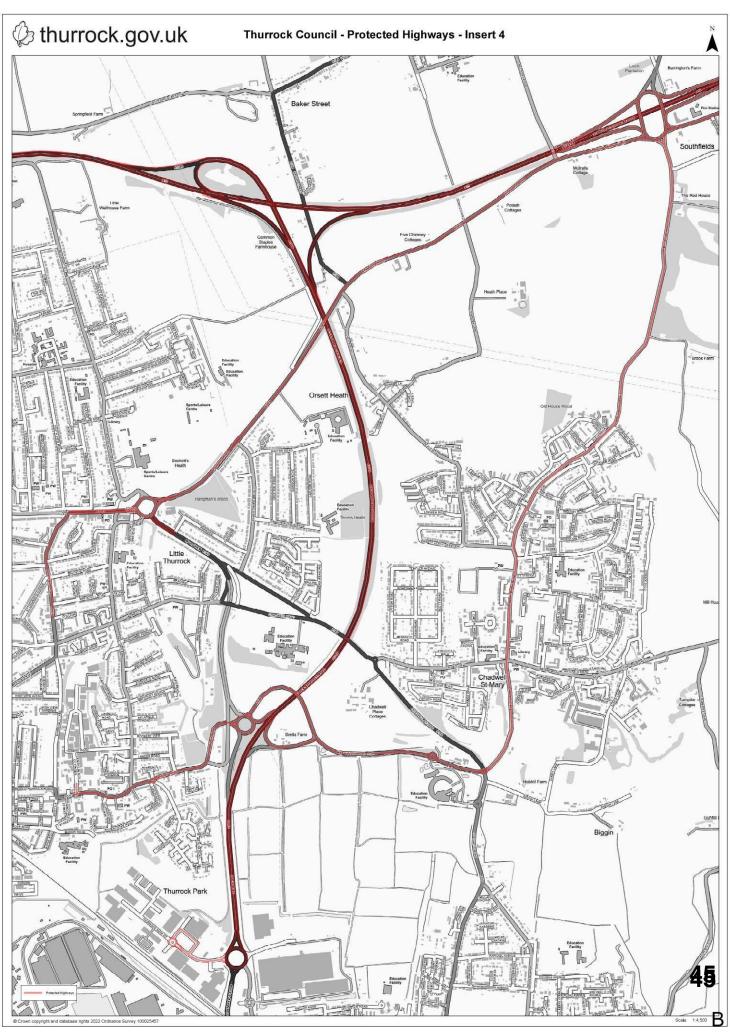
B 4

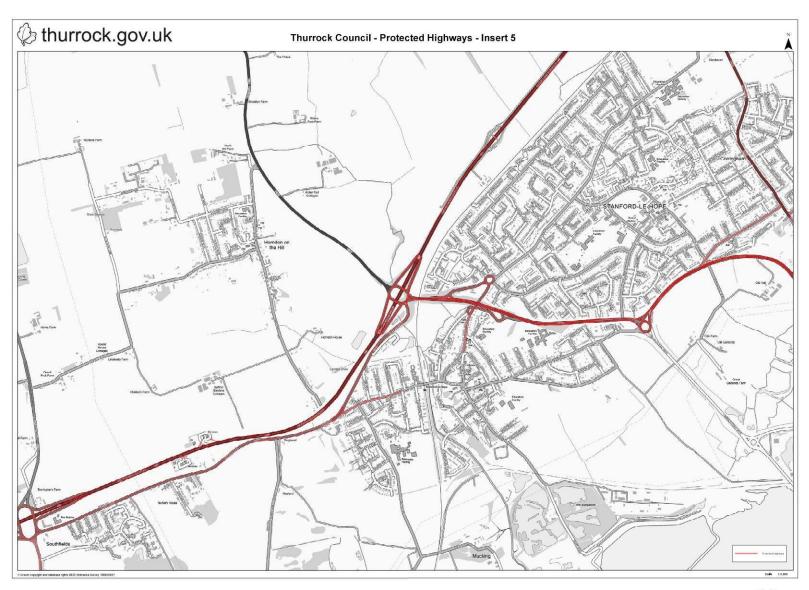


B 5

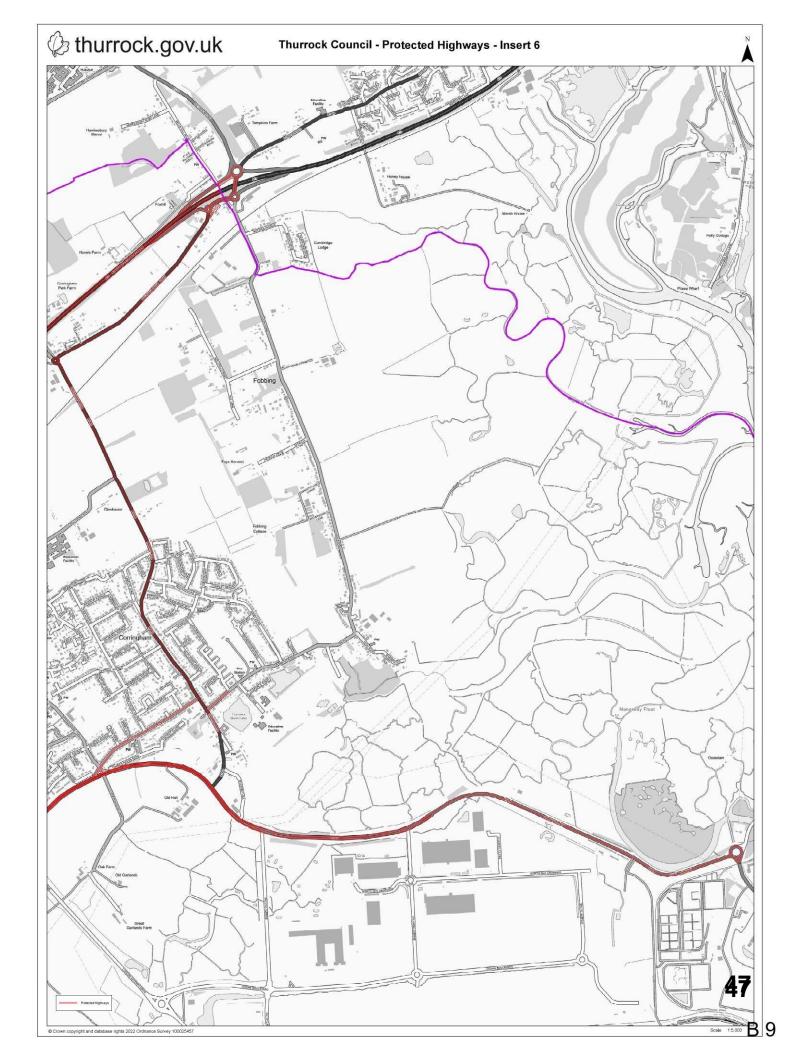


B 6





B 8



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

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)

26 January 2023 Before Mrs Justice Foster DBE

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**Claimants** 

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	<b>Defendants</b>
ANNEXE 3	



