

Fay Lashbrook
First Witness Statement
Party: Claimant
Exhibit: FL1
Dated: 30 March 2023

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No: QB-2022-001241

BETWEEN:

SHELL U.K. LIMITED

Claimant

-and-

**PERSONS UNKNOWN ENTERING OR REMANING AT THE CLAIMANT'S SITE KNOWN AS
SHELL HAVEN, STANFORD LE-HOPE (AND AS FURTHER DEFINED IN THE
PARTICULARS OF CLAIM) WITHOUT THE CONSENT OF THE CLAIMANT, OR
BLOCKING THE ENTRANCES TO THAT SITE**

Defendants

EXHIBIT FL1

This is the exhibit referred to in the First Witness Statement of Fay Lashbrook dated 30 March 2023.

F Lashbrook

Signed:

Name: Fay Lashbrook

Dated: 30 March 2023

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim No. QB-2022-001236

In the matter of an application for an injunction under s.222, Local Government Act 1972 s.130(5), Highways Act 1980 and s.1, Localism Act 2011.

B E T W E E N

NORTH WARWICKSHIRE BOROUGH COUNCIL

and



QB-2022-001236

- (1) DAVID BALDWIN
- (2) THOMAS BARBER
- (3) MICHELLE CADET-ROSE
- (4) TIM HEWES
- (5) JOHN HOWLETT
- (6) JOHN JORDAN
- (7) CARMEN LEAN
- (8) ALISON LEE
- (9) AMY PRITCHARD
- (10) STEPHEN PRITCHARD
- (11) PAUL RAITHBY
- (12) HOLLY ROTHWELL
- (13)
- (14) JOHN SMITH
- (15) BEN TAYLOR
- (16) JANE THEWLIS
- (17) ANTHONY WHITEHOUSE
- (18) ANDREW WORSLEY

(19) PERSONS UNKNOWN WHO ARE ORGANISING, PARTICIPATING IN OR ENCOURAGING OTHERS TO PARTICIPATE IN PROTESTS AGAINST THE PRODUCTION AND/OR USE OF FOSSIL FUELS, IN THE LOCALITY OF THE SITE KNOWN AS KINGSBURY OIL TERMINAL, TAMWORTH B78 2HA

Defendants

INTERIM INJUNCTION ORDER

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS 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

On the 5 May, 2022, before Mr Justice Sweeting, sitting at the Birmingham Magistrates' Court, Victoria Law Courts, Birmingham B4 6PH, the Court considered an application by the Claimant to continue, in an amended form, an injunction granted by the Court on 14 April 2022.

UPON hearing the Claimant's said application and an application to discharge the injunction brought by Mr Jake Handling and Ms Jessica Branch (the "Applicants")

AND UPON hearing counsel Mr Manning and Ms Crocombe for the Claimant, and Counsel, Mr Simblet QC for the Mr Jake Handling and Ms Jessica Branch, with no other party attending;

AND UPON considering an application for an interim injunction brought by the Claimant pursuant to the above statutory provisions, inviting the Court to exercise its discretion to grant injunctive relief pursuant to s.37(1) Senior Courts Act 1981

AND FURTHER UPON the Court being satisfied for the purposes of section 12(2) of the Human Rights Act 1998 that the Claimant has taken all practicable steps to notify the Defendants of this application.

AND FURTHER UPON the Court having previously been satisfied for the purposes of section 12(3) of the Human Rights Act 1998 that the Claimant is likely to establish at the trial of this claim that any publication restrained by this Order should not be allowed.

AND FURTHER UPON the Court having particular regard to the importance of the Convention right to freedom of expression but finding in the circumstances, having previously been satisfied that it is just and convenient, and proportionate, to grant injunctive relief in the terms set out herein, pending the trial of this claim.

AND FURTHER UPON the Court having previously been satisfied for the purposes of s.27(3), Police and Justice Act 2006, that there is a significant risk of harm to a person or persons from

the conduct prohibited by this Order and that a power of arrest should therefore be granted.

AND pending the court giving its judgment and reaching its decision on the applications mentioned above considering it appropriate to maintain the current position in relation to there being an injunction and a power of arrest until judgment or further order on the applications before the court.

IT IS ORDERED THAT

1. The Defendants SHALL NOT (whether by themselves or by instructing, encouraging or allowing any other person):
 - (a) organise or participate in (whether by themselves or with any other person), or encourage, invite or arrange for any other person to participate in any protest against the production or use of fossil fuels, at Kingsbury Oil Terminal (the “Terminal”), taking place within the areas the boundaries of which are edged in red on the Map attached to this Order at Schedule 1.
 - (b) in connection with any such protest anywhere in the locality of the Terminal perform any of the following acts:
 - (i) entering or attempting to enter the Terminal
 - (ii) congregating or encouraging or arranging for another person to congregate at any entrance to the Terminal
 - (iii) obstructing any entrance to the Terminal
 - (iv) climbing on to or otherwise damaging or interfering with any vehicle, or any object on land (including buildings, structures, caravans, trees and rocks)
 - (v) damaging any land including (but not limited to) roads, buildings, structures or trees on that land, or any pipes or equipment serving the Terminal on or beneath that land
 - (vi) affixing themselves to any other person or object or land (including roads, structures, buildings, caravans, trees or rocks)
 - (vii) erecting any structure
 - (viii) abandoning any vehicle which blocks any road or impedes the passage any other vehicle on a road or access to the Terminal
 - (ix) digging any holes in or tunnelling under (or using or occupying existing tunnels under) land, including roads;
 - (x) abseiling from bridges or from any other building, structure or tree on land or
 - (xi) instructing, assisting, or encouraging any other person to do any act prohibited by paragraphs (b)(i)-(x) of this Order.
2. A power of arrest, pursuant to s.27 Police and Justice Act 2006 shall apply to paragraph 1(a) and (b) above.
3. This Order and power of arrest shall continue until the hearing of the Claim unless previously varied or discharged by further Order of the Court.
4. Any person served with a copy of, or affected by, this Order may apply to the Court to

vary or discharge it, on 48 hours written notice to the Claimant at the address set out at the foot of this Order.

5. Pursuant to CPR rules 6.15, 6.27 and 81.4(2) (c) and (d), the Claimant shall be permitted to serve the Claim Form and supporting documents relied on, and this Order and power of arrest, by the alternative methods specified at Schedule 2 to this Order. Reservice of the Claim Form and supporting documents is dispensed with.
6. The deemed date of service of the documents referred to at paragraph 5 above shall be the date of the relevant certificate of service on completion of the steps described in Schedule 2 to this Order.

If you do not fully understand this Order you should go to a solicitor, Legal Advice Centre or Citizens' Advice Bureau.

Name and Address of the Claimant's Legal Representatives

Ms Annie Ryan

The Council House

South Street

Atherstone

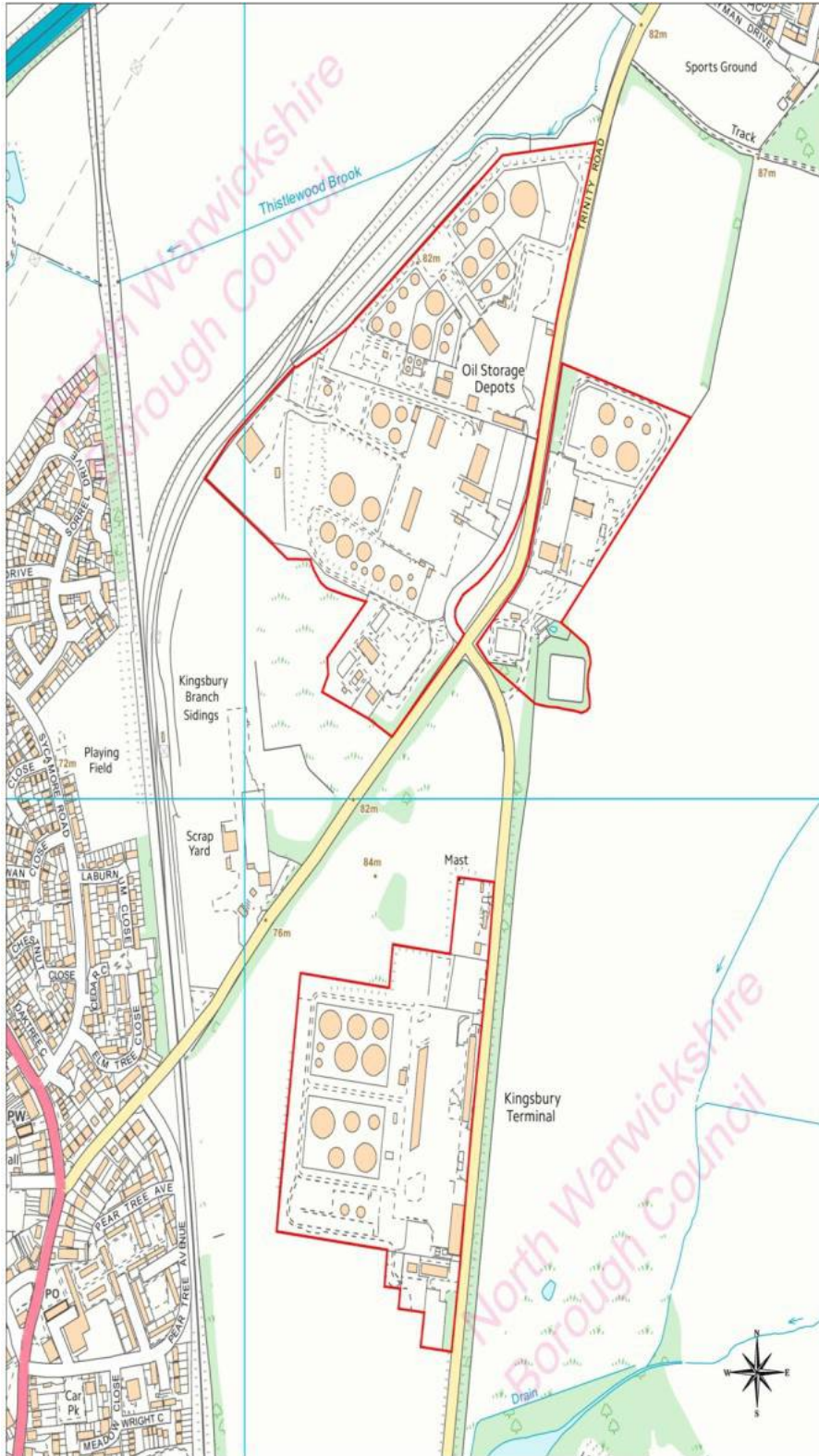
Warwickshire CV9 1DE

Email:

clivetobin@northwarks.gov.uk

annieryan@northwarks.gov.uk

SCHEDULE 1



North Warwickshire
Borough Council

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Ordnance Survey 100017910



Operator:	xxxxxx
Department:	xxxxxx
Drawing No:	nnnnnn
Date:	06/05/2022
Scale:	1:5000

SCHEDULE 2

1. Service of the Claim Form and this Order shall be effected by
 - (i) placing signs informing people of
 - (a) this Claim,
 - (b) this Order and power of arrest, and the area in which they have effect and
 - (c) where they can obtain copies of the Claim Form. Order and power of arrest, and the supporting documents used to obtain this Orderin prominent locations along the boundary of the buffer zone referred to at para.1 of this Order and particularly outside the Terminal and at the junctions of roads leading into the zone,
 - (ii) placing a copy prominently at the entrances to the Terminal;
 - (iii) posting a copy of the documents referred to at para.1(i)(c) above Order on its website, and publicising it using the Claimant's facebook page and twitter account, and posting on other relevant social media sites including local police social media accounts, and/or.
 - (iv) any other like manner as the Claimant may decide to use in order to bring the Claim Form and this Order and power of arrest to the attention of the Defendants and other persons likely to be affected.
2. If the Claimant intends to take enforcement proceedings against any person in respect of this Order, the Claimant shall, no later than the time of issuing such proceedings, serve on that person,
 - (i) a copy of the Claim Form and all supporting documents relied on to obtain this Order; and
 - (ii) a copy of this Order and power of arrest.
3. The Court will consider whether to join the person served to the proceedings as a named Defendant and whether to make any further Order.

Signed *Mr Justice Sweeting*

Dated 6th May 2022

Chronology of protester activities against and/or impacting oil refineries across England, Wales and Scotland since April/May 2022

DATE OF EVENT	LOCATION	DESCRIPTION OF INCIDENT	LINK – IF AVAILABLE	FL1 PAGE REFERENCE	
18 May 2022	Kingsbury Oil Terminal	Judgement: North Warwickshire Borough Council v Michelle Charlesworth - an individual who breached an interim injunction granted by the Honourable Mr Justice Sweeting	North Warwickshire Borough Council -v- Charlesworth - Courts and Tribunals Judiciary	FL1 – 12 to 23	
31 July 2022	Scotland – Aberdeen Harbour	“Climate activists staged a "mass trespass" at Aberdeen’s harbour in protest at any expansion of the North Sea oil and gas industry.”	Climate protestors stage 'mass trespass' demonstration at Aberdeen Harbour - Business Insider	FL1 – 24 to 25	
15 August 2022	Fawley Oil Refinery	“The High Court granted Esso an interim injunction to prevent protesters disrupting construction work on a vast aviation fuel pipeline in the south of England.”	Oil giant Esso wins High Court injunction to stop Runnymede pipeline protest The Independent	FL1 – 26 to 30	
19 August 2022	Kingsbury Oil Terminal – targeting of Grays Oil Terminal	“Twenty arrests have been made after environmental protesters staged demonstrations at a major oil facility in Essex, digging tunnels under roads to block access. The campaigners from Just Stop Oil formed a sit-down roadblock near the Navigator terminal in Thurrock early on Tuesday morning. Five people are also occupying tunnels under St Clements Way near the terminal, as well as an access road leading to the nearby Grays oil terminal”.	https://www.coventrytelegraph.net/news/local-news/live-police-block-road-amid-24823181	FL1 – 31 to 39	
to			and	https://www.itv.com/news/anglia/2022-08-23/fossil-fuel-protesters-block-essex-oil-terminals	FL1 –40 to 42
5 September 2022			Roads closed as Just Stop Oil activists 'occupy tunnels' near Kingsbury terminal - Birmingham Live (birminghammail.co.uk)	FL1 – 43 to 45	
		On 23 August 2022, Just Stop Oil reported that: “50 Just Stop Oil protestors disrupted oil supplies from two critical oil facilities this morning in Essex and Warwickshire by blocking four tunnels. Blocked Trinity Road and Piccadilly			

		<p>Way and climbed on top of a tanker on Trinity Road”.</p> <p>The BBC reposted that on Sunday 28 August 2022: "Eight protesters were arrested after a road and an oil tanker were blocked. Essex Police was called to St Clements Way in West Thurrock, Grays, at about 20:00 BST on Sunday [28 August 2022]. One person climbed on top of the vehicle while others reportedly deflated its tyres. The road was closed but reopened at 03:00 on Monday”.</p> <p>On 4 September 2022, the BBC reported that: “climate activists have ended a 13-day occupation of a tunnel dug beneath a road in Essex.</p> <p>Three Just Stop Oil campaigners were in the tunnel under St Clements Way in Grays, where they had been protesting against what they see as government inaction over climate change.</p> <p>They left voluntarily at about 15:35 BST, Just Stop Oil said.</p> <p>Essex Police said three men were arrested on suspicion of causing a public nuisance and criminal damage.”</p>	<p>Just Stop Oil supporters block critical oil terminals in Essex and Warwickshire with roadblocks and tunnels – Just Stop Oil</p> <p>https://www.suffolknews.co.uk/stowmarket/suffolk-climate-activist-arrested-after-occupying-tunnel-for-9272222/#:~:text=Essex%20Police%20said%20three%20men%20are%20in%20custody,history%20and%20our%20emergency%20services%20could%20not%20cope.</p> <p>Just Stop Oil: Eight arrests as Grays oil tanker blocked - BBC News</p> <p>Just Stop Oil protesters leave Grays tunnel after 13 days - BBC News</p>	<p>FL1 – 46 to 48</p> <p>FL1 – 49 to 50</p> <p>FL1 –51 to 54</p> <p>FL1 – 55 to 58</p>
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14 September 2022	Kingsbury Oil Terminal	<p>On 14 September 2022, Just Stop Oil reported that: "a group of 50 ordinary people are risking their liberty to sit peacefully outside the Kingsbury Oil Terminal holding banners, in breach of a private injunction designed to protect the profits of the oil industry. This is the first of a series of nonviolent actions in support of Just Stop Oil's demand that the UK government end new oil and gas projects in the UK.</p> <p>The injunction granted to North Warwickshire Borough Council on 14th April, gives sweeping powers of arrest to the authorities and effectively outlaws any protest activity near the Kingsbury Terminal, the largest inland oil storage depot in the country."</p>	<p>50 Just Stop Oil Supporters breach the Warwickshire injunction – Just Stop Oil</p> <p>'Just Stop Oil': Two Bristol women deliberately get jailed - Bristol Live (bristolpost.co.uk)</p> <p>Police arrest 51 Just Stop Oil protesters at Kingsbury Oil Terminal - Birmingham Live (birminghammail.co.uk)</p> <p>Telford pensioner is jailed for oil terminal protest Shropshire Star</p> <p>Exeter grandmother arrested in Just Stop Oil Protest - Devon Live</p> <p>Just Stop Oil protests live as police make arrests at Kingsbury Terminal injunction - Birmingham Live (birminghammail.co.uk)</p> <p>One Just Stop Oil supporter jailed while 10 walk free after peaceful resistance at Kingsbury Oil Terminal – Just Stop Oil</p>	<p>FL1 – 59 to 62</p> <p>FL1 – 63 to 73</p> <p>FL1 – 74 to 75</p> <p>FL1 – 76 to 77</p> <p>FL1 – 78 to 82</p> <p>FL1 – 83 to 86</p> <p>FL1 - 87 to 90</p>
27 September 2022	Kingsbury Oil Terminal	Judgement of findings against individuals following the Kingsbury protest which took place on 14 September 2022.	<p>North Warwickshire Borough Council v Litten & Ors [2022] EWHC 2777 (KB) (27 September 2022) (bailii.org)</p>	FL1 – 91 to 108

31 January 2023	Ship bound for North Sea	<p>"Greenpeace International activists have boarded a ship carrying crucial equipment for Shell to produce more oil and gas in the North Sea."</p> <p>It was reported that: "Greenpeace activist Yeb Saño said "Shell might think this is the end of our protest, but my message to chief executive Wael Sawan is that this is just the beginning. We are seeing people connecting the dots between fossil fuel mega profits and the bill for climate loss and damage. It is right that the likes of Shell must pay for devastation that they are directly causing".</p>	<p>How Greenpeace activists occupied a Shell platform heading for a major oil and gas field Greenpeace UK</p> <p>Breaking: Greenpeace activists have occupied a Shell platform heading for a major oil and gas field - Greenpeace International</p> <p>https://www.theguardian.com/environment/2023/jan/31/greenpeace-protesters-board-shell-platform-bound-for-shetland.</p> <p>https://www.businessinsider.com/climate-activists-occupy-shell-platform-ship-headed-major-oil-fields-2023-2?r=US&IR=T</p>	<p>FL1 -109 to 119</p> <p>FL1 - 120 to 124</p> <p>FL1 -125 to 128</p> <p>FL1 - 129</p>
14 February 2023	Private Airport, Luton – approx. an hour drive away from Shell Haven	<p>"Extinction Rebellion activists parked a boat in front of the gates to the private jet terminal at Luton Airport with protesters locked on to the deck and hull."</p>	<p>Extinction Rebellion campaigners target private jets at Luton in Valentine's Day protest ITV News Anglia</p> <p>LOVE IN ACTION: Extinction Rebellion blockades Luton Airport private jet terminals in Valentine's Day protest - Extinction Rebellion UK</p>	<p>FL1 -130 to 132</p> <p>FL1 - 133 to 137</p>

Neutral Citation Number: [2022] EWHC 1464 (QB)

Case No: QB-2022-001236

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

Sitting at
Birmingham Crown Court, 1 Newton Street,
Birmingham, B4 7NR

Date: 18/05/2022

Before:

HER HONOUR JUDGE EMMA KELLY

Between:

**NORTH WARWICKSHIRE BOROUGH
COUNCIL**

Claimant

- and -

MICHELLE CHARLESWORTH

Defendant

MR SHEPHARD of Counsel appeared for the **Claimant**
MR JONES of Counsel appeared for the **Defendant**

APPROVED JUDGMENT

If this Transcript is to be reported or published, there is a requirement to ensure that no reporting restriction will be breached. This is particularly important in relation to any case involving a sexual offence, where the victim is guaranteed lifetime anonymity (Sexual Offences (Amendment) Act 1992), or where an order has been made in relation to a young person.

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HER HONOUR JUDGE EMMA KELLY:

1. Ms Charlesworth you appear before the court in respect of:
 - i) Two admitted breaches of an interim injunction granted by the Honourable Mr Justice Sweeting 14th April 2022. Those breaches occurred on 27th April 2022 and 4th May 2022.
 - ii) In addition, one admitted contempt in the face of court occurring on 5th May 2022.
2. You have the benefit of legal representation and I have heard from counsel, Mr Jones, on your behalf.
3. The claimant has provided you with written particulars of the two breaches of the interim injunction. The court has served you with a summons in form N601 in respect of a contempt in the face of court matter. The court has to be satisfied of any allegation of contempt to the criminal standard of proof, namely beyond reasonable doubt. In light of your admissions, and also having read the police witness evidence in respect of events on 27th April and 4th May, I am so satisfied.

Background

4. The background to your appearance today is as follows. Kingsbury Oil Terminal is a large inland oil terminal located near Tamworth in Warwickshire. Various protests at the terminal gave rise to serious health and safety concerns leading the claimant to apply for an interim injunction to protect the site. On 14th April 2022 Mr Justice Sweeting granted an interim without notice injunction against various named defendants, of which you were not so named, and “persons unknown.” The “persons unknown” were defined as those “who are organising, participating in or encouraging others to participate in protests against the production and/or use of fossil fuels in the locality of the site known as Kingsbury Oil Terminal, Tamworth B78 2HA.” Pursuant to section 27 of the Police and Justice Act 2006, a power of arrest was attached to the interim injunction.

5. Paragraph 1(a) of the interim injunction stated:

“The defendants SHALL NOT (whether by themselves or by instructing, encouraging, or allowing any other person):

(a) organise or participate in (whether by themselves or with any other person), or encourage, invite, or arrange for any other person to participate in any protest against the production or use of fossil fuels at Kingsbury Oil Terminal (the ‘Terminal’) taking place within the areas of the boundaries of which are edged in red on the map attached to this order at schedule 1, or within five metres of those boundaries (edged in red) (the ‘buffer zone’).

The paragraph went on to state:

“For the avoidance of doubt, this prohibition does not prevent the defendants from using any public highway within the buffer zone for the purpose of travelling to or from the protest held, or to be held, outside the buffer zone.”

6. Paragraph 1(b) of the interim injunction prohibited “in connection with any such protest anywhere in the locality of the Terminal” a number of defined acts.
7. Mr Justice Sweeting granted permission for the interim injunction to be served by alternative methods. On 14th April 2022 it was served by placing signage in prominent locations around the site and on the claimant’s website, Facebook and Twitter accounts.
8. You appear before the court in relation to two breaches of the interim injunction. On 27th April 2022, just after 4pm, you were one of ten individuals gathered on a grass verge to the side of the main entrance to Kingsbury Oil Terminal to protest against the use and/or production of fossil fuels. Your protest was inside the buffer zone referred to in paragraph 1(a) of the injunction and was thus in breach of its terms. The police advised your group to move away and indicated where you could continue to protest without being in breach of the injunction. You and your fellow protestors refused to move and were subsequently arrested. The claimant accepts, and the court agrees, that the protest was entirely peaceful albeit in breach of paragraph 1(a) of the injunction for being inside the buffer zone.

9. You were produced before the court on 28th April and bailed on condition that you comply with the terms of the injunction to attend the next hearing on 4th May 2022
10. On 4th May 2022 you failed to attend court to answer bail to deal with the breach of the allegation from the previous week and instead chose to attend Kingsbury Oil Terminal to continue your protest. At approximately 2pm you and ten others again stood on a grass verge to the side of the entrance to the site with placards and banners. Again, that protest was inside the buffer zone referred to in paragraph 1(a) of the injunction. Police officers approached your group and some of your fellow protestors told the police they were due to appear at court that day but had failed to do so. Your group then huddled together and held some form of discussion before walking across the road outside the Terminal entrance. It is said by the claimant that such behaviour impeded the route of oil tankers trying to enter the Terminal. I accept there is no evidence that your individual actions in walking across the road caused any tanker's route to be impeded. However, the protest both on the grass verge and on the road were inside the buffer zone and thus in breach of paragraph 1(a) of the injunction.
11. The police again exercised the power of arrest and you were taken to Nuneaton Police Station before being produced before this court on 5th May. You were represented by counsel at that hearing. In light of the large number of protestors that had been produced before the court that day, and the need for you to have time to take legal advice, your case was adjourned to 12th May. You were remanded in custody. At approximately 5pm, as you stood up to be taken down to the cells with the custodians, you glued yourself to the dock screen using solvent that you had secreted on your person.
12. Your actions in court on 5th May caused very significant disruption to the court process. The custodians could not remove you. The police had to be called who, in turn, had to call in specialist police officers with de-bonding expertise. At the time of your actions, the court still had six other defendants' cases to deal with. Another court room had to be convened but the court could not immediately recommence as there were insufficient custodians to bring

defendants from the cells into court as a result of the need of multiple officers to remain with you. It was approximately 8pm before the court concluded.

The legal framework

13. I turn to the question of penalty.
14. As to the contempt in the face of court, the High Court, as a superior court of record, has an inherent jurisdiction to deal with contempt affecting its own proceedings. It is not subject to the limitations imposed on inferior courts of record as to the length of sentence for contempt in the face of court. For example, section 12 of the Contempt of Court Act 1981 constrains the Magistrates' Court to a maximum period of committal of one month in respect of contempt relating to its proceedings. In the County Court, section 118 of the County Courts Act 1984 makes similar provision. The High Court is not so constrained. Section 14(1) of the Contempt of Court Act 1981 nonetheless applies, such that the term of any custodial sentence on any occasion shall not exceed two years in a case of committal by a superior court. By section 14(2) of the 1981 Act, the court has the power to impose a fine of unlimited amount or order sequestration of assets.
15. When imposing penalties for contempt of court, the Court of Appeal in *Willoughby v Solihull MBC* [2013] EWCA Civ 699 identified three objectives. Pitchford LJ at [20] held:

“the first is punishment for breach of an order of the court; the second is to secure future compliance with the court’s orders, if possible; the third is rehabilitation, which is a natural companion to the second objective.”
16. The Sentencing Council does not produce guidelines for contempt of court, whether that be breach of a civil injunction or contempt in the face of court. In *Amicus Horizon Ltd v Thorley* [2012] EWCA Civ 817, the Court of Appeal found that the definitive guidelines for breach of an anti-social behaviour order were equally relevant when dealing with breaches of anti-social behaviour orders in the civil courts. When that analogy was used by the first instance judge in *Cuadrilla Bowland v Persons Unknown* [2020] EWCA Civ

9, also a protestor case, the Court of Appeal endorsed reference to those guidelines. Leggatt LJ at [102] held as follows:

“In deciding what sanctions were appropriate, the judge approached the decision, correctly, by considering both the culpability of the appellants and the harm caused, intended or likely to be caused by their breaches of the injunction. I see no merit in the appellants’ argument that, in making this assessment, he misapplied the Sentencing Council guideline on sentencing for breach of a criminal behaviour order. In *Venables v News Group Newspapers [2019] EWCA Civ 534*, para 26, this court thought it appropriate to have regard to that guideline in deciding what penalty to impose for contempt of court in breaching an injunction. As the court noted, however, the guideline does not apply to proceedings for committal. There is therefore no obligation on a judge to follow the guideline in such proceedings and I do not consider that, if a judge does not have regard to it, this can be said to be an error of law. The criminal sentencing guideline provides, at most, a useful comparison.”

17. In their report of July 2020, the Civil Justice Council looked at appropriate penalties for contempt of court arising from injunctions made under the Anti-social Behaviour, Crime and Policing Act 2014. Those draft guidelines, similar in style to the Sentencing Council guidelines, were adapted to reflect the lower range of penalties in the civil courts. Those guidelines have never been brought into force. I note that the Sentencing Council Definitive Guidelines state in express terms that draft guidelines should not be taken into consideration.
18. I bear in mind that the matters of contempt before me today are not breaches of an anti-social behaviour injunction. However, page 56 of the Definitive Guideline for Breach Offences states:

“Where an offence is not covered by a sentencing guideline a court is also entitled to use, and may be assisted by, a guideline for an analogous offence subject to differences in the elements of the offences and statutory maxima.”

Against this background a breach of an injunction is clearly analogous to breach of a criminal behaviour order and that Definitive Guideline will be of considerable assistance in respect of the breaches of the injunction on 27th April and 4th May 2022.

19. However, the contempt in the face of court does not involve the breach of any specific order. It was a deliberate attempt to undermine the authority of the court and an attempt to interfere with the administration of justice. The most serious aspect of your behaviour is the contempt in the face of court on 5th May, so I propose to consider that first.
20. In circumstances where the Definitive Guideline for breach of a criminal behaviour order is only of limited analogy when dealing with contempt in the face of court, I propose to begin by considering your behaviour by reference to the Sentencing Council's General Guideline. That provides overarching principles for use where there is no guideline. The court must consider culpability and harm. The question of culpability "is assessed with reference to the offender's role, level of intention and/or premeditation and the extent and sophistication of planning." In terms of culpability, the contempt in the face of court on 5th May was a deliberate act with substantial planning. You had armed yourself with glue intent on using it for a contemptuous purpose, either by breaching the injunction and/or in the manner in which you eventually used it. You concealed the glue notwithstanding you had been arrested the previous day, spent the night in custody at Nuneaton Police Station and were thereafter handed over to GeoAmey custodians at the Magistrates' Court cells. You continued to conceal the glue when you came into the court room whilst in custody. Culpability is at a high level, albeit falling short of the highest level, as I accept your planning falls short of the most sophisticated of adventures.
21. In terms of harm, your actions caused considerable disruption to the administration of justice, a delay of several hours to other proceedings and the diversion of police, custodian and court staff resources. Furthermore, your conduct involved the risk of undermining the court's authority in the eyes of others. Balancing these factors, harm is at a significant level falling between the highest and lowest levels.
22. Notwithstanding my conclusion that the breach of the criminal behaviour order Definitive Guideline is of limited assistance, I propose to place it within the guideline as providing the closest analogy that can be found. Importing

my conclusions from the general guidelines, I conclude your behaviour would fall within culpability A, and category harm 2, giving a starting point in the criminal courts of one year's custody and a category range between a high level community order and two years' custody.

23. Before considering aggravating and mitigating factors, I will consider where the two breaches of the injunction fall within the Sentencing Council guideline. Both breaches were deliberate and planned, although you caused little or no harm or distress. As such, both breaches of the injunction would fall into culpability B and category harm 3 with a starting point of a high level community order and a range from a low level community order to 26 weeks' custody. The second breach was on bail, within days of the first breach, and in circumstances where you failed to attend court the same day. Those matters increase the seriousness of the breach on 4th May. However, even in combination, the two breaches of the injunction would not of themselves have justified a custodial sentence and therefore the court would have been limited to an appropriate fine dependent on your means.
24. The contempt in the face of court does, however, cross the custody threshold. By reference to the Sentencing Council totality guideline, I propose to pass no separate penalty on the earlier two breaches but treat them as aggravating features of the contempt in the face of court.
25. In my judgment, seen cumulatively, your conduct evidences a pattern of behaviour of escalating seriousness. There are limited other aggravating features. You have two criminal convictions for public nuisance arising from protest activity on 15th September 2021. You entered a guilty plea to those charges on 22nd April 2022 and are still awaiting sentence. It appears from your antecedent history that you were remanded on unconditional bail in relation to those matters and therefore the matters of contempt before this court were committed whilst on unconditional bail for the criminal matters.
26. I turn to consider any mitigating factors. Your counsel tells me that, as a result of your behaviour in court on 5th May, you were sanctioned in prison and subject to solitary confinement. The precise details of the sanction are unclear.

I am told that you were sentenced to two separate days in solitary confinement, but it may be that one of the days was referable to a separate incident of disorder in the prison. However, I propose to approach the ambiguity on the most generous basis to you and assume that both days in solitary confinement relate to the gluing incident in court on 5th May. That sanction represents an element of punishment already delivered in respect of your behaviour and I bear that in mind when determining the appropriate penalty. I also bear in mind that conditions in prison for all prisoners at present are onerous due to the continuing effects of the pandemic.

27. You put before the court through counsel significant personal mitigation. Having read your nine character references and heard from counsel, it is apparent that hitherto you have led a thoroughly worthwhile and law abiding life. Until you gave up employment in March 2022 to concentrate on your protest actions, you had responsible roles working with victims of domestic violence, the homeless and in environmental roles. To that extent, you have contributed in a very beneficial way to society. You have three adult children, albeit the youngest is still only 19 and at university and for whom you provide financial support. I take all your personal mitigation into account.
28. You have admitted the contempt in the face of the court at the earliest opportunity as today was the first hearing following the serving of the summons. However, I detect no element of remorse. After events on 5th May, you continued to defy the court process and, when your case was listed on 12th May, you refused leave prison to attend court.
29. Balancing those features, I conclude that the appropriate penalty for the contempt in the face of court, before consideration of credit for your admission, is one of 14 weeks' custody. You are entitled to a discount of one third to reflect your admission of breach at the earliest opportunity. That produces a penalty of 9 weeks or 63 days, rounding down the weeks in your favour.
30. The court has to consider whether it is appropriate to suspend any term of imprisonment. Your counsel, in support of his submission that any custodial

sentence should be suspended refers, quite properly, to the comments of the Court of Appeal in *Cuadrilla Bowland*. Leggatt LJ at held as follows:

“[95] Where, as in the present case, individuals not only resort to compulsion to hinder or try to stop lawful activities of others of which they disapprove, but do so in deliberate defiance of a court order, they have no reason to expect that their conscientious motives will insulate them from the sanction of imprisonment.

[96] On the other hand, courts are frequently reluctant to make orders for the immediate imprisonment of protestors who engage in deliberately disruptive but non-violent forms of direct action protest for conscientious reasons...”

The judge continued:

“[98] It seems to me that there are at least three reasons for showing greater clemency in response to such acts of civil disobedience than in dealing with other disobedience of the law. First, by adhering to the conditions mentioned, a person who engages in acts of civil disobedience establishes a moral difference between herself and ordinary law-breakers which it is right to take into account in determining what punishment is deserved. Second, by reason of that difference and the fact that such a protestor is generally – apart from their protest activity – a law-abiding citizen, there is reason to expect that less severe punishment is necessary to deter such a person from further law-breaking. Third, part of the purpose of imposing sanctions, whether for a criminal offence or for intentional breach of an injunction, is to engage in a dialogue with the defendant so that he or she appreciates the reasons why in a democratic society it is the duty of responsible citizens to obey the law and respect the rights of others, even where the law or other people’s lawful activities are contrary to the protestor’s own moral convictions. Such a dialogue is more likely to be effective where authorities (including judicial authorities) show restraint in anticipation that the defendant will respond by desisting from further breaches. This is part of what I believe Lord Burnett CJ meant in the Roberts case at para 34 (quoted above) when he referred to “bargain or mutual understanding operating in such cases.

[99] These considerations explain why, in a case where an act of civil disobedience constitutes a criminal offence or contempt of a court order which is so serious that it crosses the custody threshold, it will nonetheless very often be appropriate to suspend the operation of the sanction on

condition there is no further breach during a specified period of time. Of course, if the defendant does not comply with that condition, he or she must expect that the order for imprisonment will be implemented.”

31. I bear in mind that your actions, insofar as you breached the injunction on the two occasions, were borne out of protest activity and were acts of civil disobedience by somebody who is otherwise a law-abiding citizen. I have already indicated that in isolation the breaches of the injunction would not have warranted a custodial sentence. The contempt in the face of the court is however distinguishable from the behaviour seen in *Cuadrilla Bowland*. Your actions on 5th May went further than they type of civil disobedience seen in *Cuadrilla* and struck at the heart of the administration of justice and sought to undermine the rule of law.
32. I have referred myself to the Sentencing Council guidelines on the imposition of community and custodial sentences. In this respect, your conduct demonstrates a history of poor compliance with court orders and the appropriate punishment can only be achieved by an immediate custodial penalty. Furthermore, this is not a case in which it can be said there is a realistic prospect of rehabilitation. Balancing these features leads me to the conclusion it is not appropriate to suspend the penalty.
33. In terms of fixing the term of imprisonment, the court has to take into account the time you have already spent on remand. Unlike when sentences are imposed in the criminal courts, the prison service cannot adjust the penalty on a civil contempt to take into account the time spent on remand. You have already spent 15 days in custody: one day in custody following your arrest on 27th April and a further 14 days from your arrest on 4th May and subsequent further remands in custody. That is the equivalent of a 30-day sentence. I therefore deduct 30 days from the 63-day term. I pass a penalty of 33 days immediate imprisonment in respect of the contempt in the face of court on 5th May. There will be no order made on the contempt matters on 27th April and 4th May for the reasons I have given, namely that I have treated those as aggravating factors of the contempt in the face of court.

34. You have a right to appeal the order of committal. Any appeal must be made to the Court of Appeal Civil Division and must be filed within 21 days of today.
35. The claimant does not apply for costs and therefore I do not make an order that you pay the claimant's costs.
36. In dealing with these contempt of court matters, this court sends out a very clear message that it will not tolerate either breaches of its orders or, even more so, behaviour that interferes with the administration of justice. If you return to court in respect of further matters of contempt, you risk further periods in custody.
37. A transcript of this judgment will be ordered at public expense on an expedited basis.

(Judgment ends)

Climate protestors stage 'mass trespass' demonstration at Aberdeen Harbour

The action saw the protesters march into part of the harbour next to St Fittick's Park in Torry

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 Climate activists staging a "mass trespass" at Aberdeen's harbour (Image: PA)

Climate activists have staged a "mass trespass" at Aberdeen's harbour in protest at any expansion of the North Sea oil and gas industry.

The campaigners, who are in the city as part of the Climate Camp Scotland event, said they entered part of the harbour on Sunday in opposition to the expansion of the fossil fuel industry and in defence of nearby green space.

The action saw the protesters march into part of the harbour next to St Fittick's Park in Torry, an area of green space it said was threatened by the development of an energy transition zone.

Jessica Gaitan Johannesson, of Climate Camp Scotland, said: "As an increasing number of people experience the dire reality of climate collapse, and soaring energy prices victimise the most vulnerable, we need to remember that fossil fuel companies do not work for us.

"The proposed energy transition zone in Torry is a stark example of their priorities: to exploit communities for profit for as long as possible.

"We're here in solidarity with the people of Aberdeen, making the vital connection between local and global climate justice."

The group said it was inside the harbour for several hours and the protest took place in an area of Old Torry where fossil fuel firms demolished homes to expand the harbour in the 1970s.

Climate Camp Scotland's latest event follows approval for the Cambo and Jackdaw developments in the North Sea, and comes as Aberdeenshire Council prepares to decide if a new gas-fired power station should be built at Peterhead.

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EXHIBIT FL1 - 24

Activists said they wanted the UK Government to cancel plans for new oil and gas fields, and for the local authority to reject the new gas-fired power station.

They have also called on the Scottish Government to ensure communities and workers have a greater say over the Just Transition Fund in the region, and said hydrogen and carbon capture had been prioritised over publicly owned renewable power and the reduction in energy demand.

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The harbour protest followed a rally in Aberdeen city centre which featured climate activists, the Aberdeen Trade Union Council, Green MSP Maggie Chapman, and local campaigners from Friends of St Fittick's Park.

Steve Gray, a member of Aberdeen Trade Union Council, said the city needed a "just transition for all its people", adding: "The last thing that people in Torry need is an industrial wasteland on their doorstep."

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Last year, more than 150 people attended a protest camp outside a refinery in Fife, where they demanded it be shut down.

This year the camp is set to run from 28 July to 1 August.

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Oil giant Esso wins High Court injunction to stop protesters disrupting pipeline construction

Activist tunnelled underground near M25 – named in court order – accuses firm of ‘pouring fuel onto the flames’ of a world ‘on fire’

Andy Gregory • Monday 15 August 2022 23:31



The pipeline carries fuel from the Fawley refinery (pictured) to Hounslow, near Heathrow Airport
(Daniel Leal/AFP via Getty Images)



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The **High Court** has granted Esso an interim **injunction** to prevent protesters disrupting construction work on a vast aviation fuel pipeline in the south of England.

The oil giant, which is owned by **ExxonMobil**, received development consent in October 2020 to replace 90km of pipe between Hampshire and the firm's terminal storage facility near **Heathrow Airport** – a project it insists will help keep 100 tankers a day off the road.

But activists warn the new pipeline will more than double the flow of fuel to Heathrow and accused Esso of continuing “to plan for growth in climate-

Protesters have sought to disrupt the construction of the new pipeline by interfering with equipment, “attacking” it with angle grinders, and tunneling underground where the pipeline crosses the M25 in the Surrey borough of Runnymede, a judge was told.

Activist Scott Breen, also known as “Digger Down”, appears to have now been camped out for a fortnight in the tunnel at Chertsey, which lawyers for Esso told the High Court was at a “sensitive” position near the motorway needed by the firm’s contractors for access.

Recommended



Energy giants’ profits ‘not evil’, says Liz Truss as industry demands windfall tax ditched by 2025

Esso was granted an interim injunction against Mr Breen and “persons unknown” following a hearing before Mr Justice Eyre at the Royal Courts of Justice in London on Monday.

The oil giant had urgently sought the injunction to prevent people from “conspiring to injure” its business “by unlawful means”, Esso’s lawyer Timothy Morshead QC, said in written submissions.

“The unlawful means in question consist of the actual and threatened trespasses to goods and also to land which [Esso] has experienced – and which continues to be threatened against the pipeline project,” Mr Morshead said.

He added: “The activities carried out by some protesters go far beyond lawful and peaceful protest, and give rise to serious health and safety concerns.”

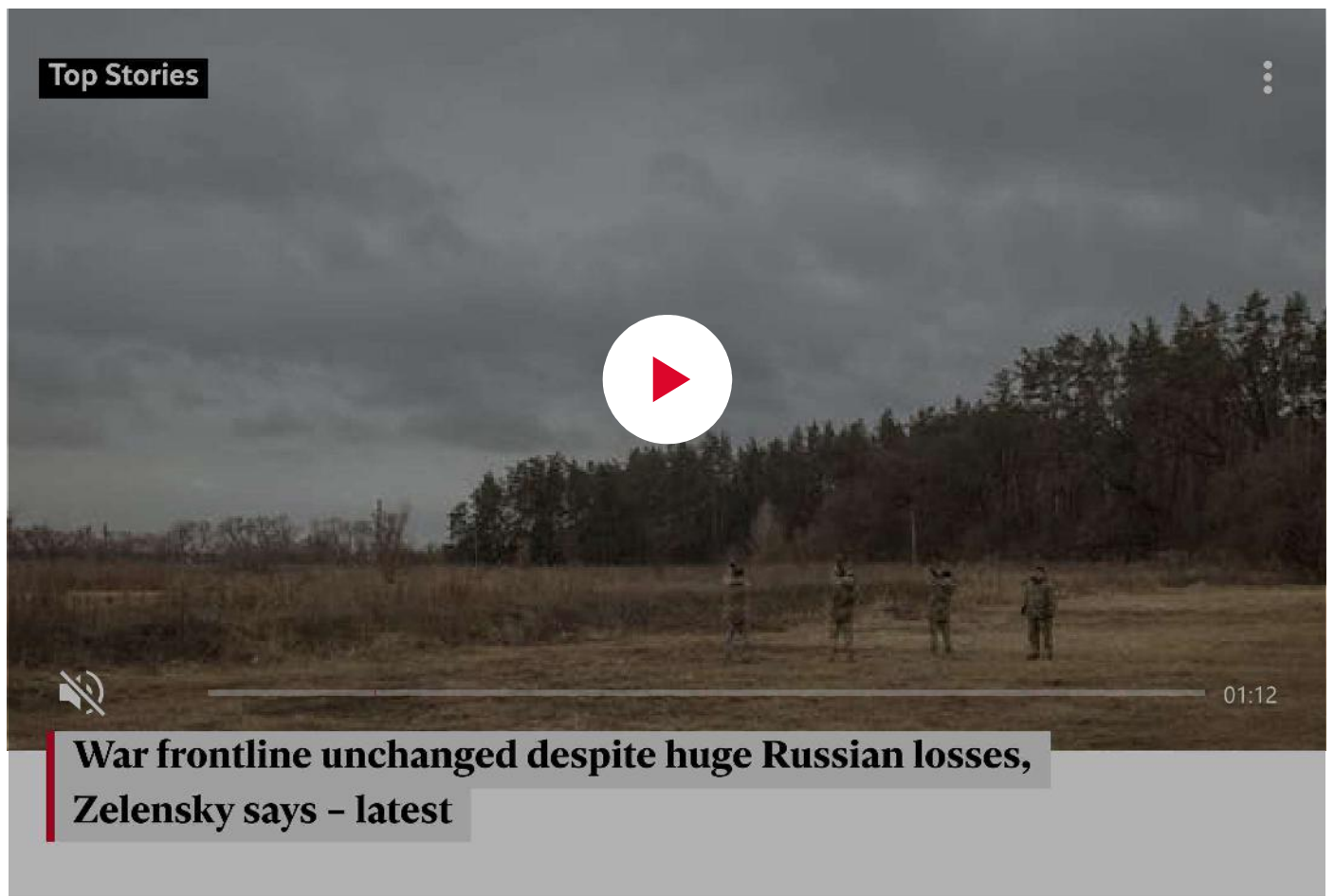
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Project”, Mr Morshead said.



In his ruling, Mr Justice Eyre said there was “material indicating an agreement between a number of persons to disrupt the construction of the pipeline, to do so by entry onto private land and/or land which is enclosed for the purposes of the construction of the pipeline”.

He said the purpose of this was to “harm” Esso “by preventing it building the pipeline which it is authorised to build”, and said there had been “threats of further disruption” posted on the internet.

The judge noted that protest action came against a background of “strongly-held beliefs and concerns about the effect of air travel” and said he considered the “legitimate public interest in the changes to the climate”.

But he concluded an injunction was “proportionate and necessary to ensure that [Esso] is permitted to carry on its lawful activities”. He set a date of 7 September for the injunction, which has geographical limits, to be reconsidered by the court.

The judge said he was “just about persuaded” to order an injunction against Mr Breen, who was not represented at court. He noted that on social media Mr Breen had accepted that he had been asked to leave his pit by Esso and Runnymede Borough Council but he had not done so.

Mr Breen has 72 hours to remove himself once the order is served to him, the judge said.

The activist – who last year said he had **spent 19 days in a tunnel near London’s Euston Station** while protesting the HS2 rail project – said in a statement shortly after “locking on” at the Chertsey tunnel: “As the UK experiences record breaking temperatures, ExxonMobil continues to plan for growth in climate destroying fossil fuel use.

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“Our world is on fire and ExxonMobil is pouring fuel onto the flames. The current pipeline still has at least twenty years of useful life left, time which could be used to scale back air travel and develop zero carbon alternatives.”

Extinction Rebellion warned that the new pipeline will be wider than the existing pipeline – built in 1972 – “enabling the new pipe to supply 140 per cent more aviation fuel to Heathrow, aiding further expansion and increased flight numbers”.

Additional reporting by PA

80701031297

Live: Police block road amid reports oil protesters have dug up road near to Kingsbury Oil Terminal

They have reportedly been digging under a main road

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A flashback to the blockade at Kingsbury Oil Terminal in North Warwickshire back in April (Image: Jacob King/PA Wire)

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Police have blocked off a main road in Kingsbury as oil protestors have reportedly struck again today (August 22). It has been reported that traffic cannot get through to Kingsbury past Piccadilly this afternoon.

Reports on social media suggest police officers have been turning traffic away on Trinity Road by Kingsbury Link for almost an hour. Oil protestors have reportedly been digging under the road, making it unsafe.

The area is covered by a high court injunction. It was granted back on April 14 to prevent further protests at the Kingsbury Oil Terminal following two weeks of chaos caused by the Just Stop Oil group.

READ MORE: [Vandals trash brand new play area before it is officially opened](#)

We have contacted Warwickshire Police in regards to the situation.

This is a liveblog, you can follow updates in the comments below

KEY EVENTS



Police confirm 'activity' around oil depot

16:37

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Entrants must be 18 or over, full T&Cs apply.



17:23



CLAIRE HARRISON

Police confirm road closure

In a new statement, Warwickshire Police has confirmed the Trinity Road closure. It reads:



We can confirm that the section of Trinity Road between the railway bridge and the roundabout is shut. Police are working closely with partners to minimise any disruption to the local community."



138415682727

16:53

CLAIRE HARRISON

Fire crews action in woodland

Fire crews have been spotting with a hose reel leading into woodland off Trinity Road, on the side of the road close to the railway line.

A engine arrived, took the hose reel towards the wooded area, and then left. It then returned again.

Trinity Road remains closed between Kingsbury Link road island to the Picadilly T-Junction.



16:39

CLAIRE HARRISON

Full police statement

The full Warwickshire Police statement is as follows:



"We are aware of activity in the vicinity of Kingsbury Oil Terminal this morning (Monday) and officers are currently in the area carrying out patrols and providing reassurance.

*"While there is minimal impact to the wider community at this time, we would encourage anyone who witnesses any suspicious activity to report it **online**."*

16:37

KEY EVENT

Police confirm 'activity' around oil depot

Warwickshire Police has confirmed 'activity' around Kingsbury Oil depot. In a statement provided to CoventryLive, the force has said it was alerted earlier this morning.

Details about the 'activity' have not been revealed by the force, for 'operational reasons'.

The force has confirmed there is a police presence in the area to provide reassurance to residents.



Police tape has been thrown around a gate off the main Trinity Road

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Road remains closed



Police at the scene in Trinity Road, Kingsbury as the road closure remains in place

Part of Trinity Road remains coned off and closed to traffic.

There are a number of police cars in the area.

Warwickshire Police has still not indicated what has happened, although reports suggest oil protesters have caused damage to the road after tunnelling underneath.



Fire engine at the scene



📍 A fire engine was spotted at the scene in Trinity Road earlier today (August 22)

A fire engine has been spotted in the Trinity Road area.

Part of the road remains closed.

We have still not received any official comment from Warwickshire Police or Warwickshire County Council.



15:18

CLAIRE HARRISON

Highways

As well as asking Warwickshire Police about the situation, we have also asked Warwickshire County Council's highways teams in regards to the road itself.

Reports suggest part of the road has been made unsafe due to tunnelling underneath it.

Highways teams will have to make any major repairs to the road. We will bring you updates from the highways team as soon as we have them.

76516486337

15:05 

CLAIRE HARRISON

Tunnelling in the area

There have been reports of tunnelling in the area in the past.

Back in April there were [seven people arrested after a tunnel was discovered in Trinity Road.](#)

Police discovered the tunnel under the road close to the oil depot.

There have also been unconfirmed reports of tunnelling in the area just over a month ago.

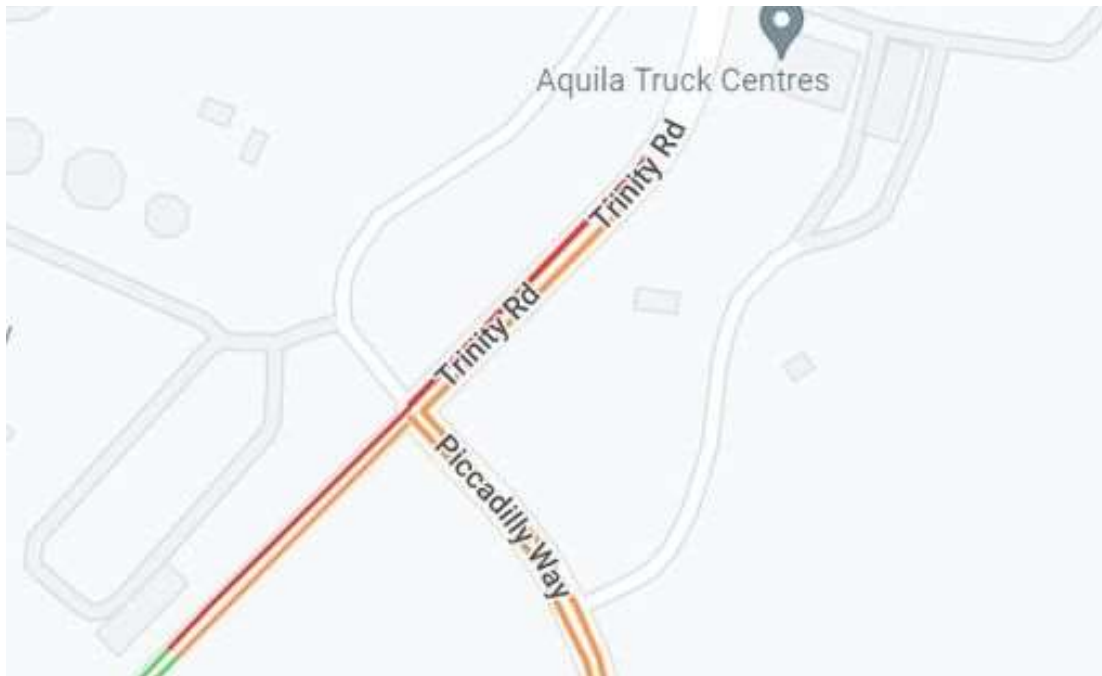
14:52 


CLAIRE HARRISON

Traffic map shows closures

Live traffic maps show that traffic has been stopped on Trinity Road, close to its junction with Picadilly Way.

The area is showing red, highlighting that traffic is not passing towards Kingsbury.



 The live map shows traffic has ground to a halt on Trinity Road (Image: Google Live maps)



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Just Stop Oil protesters block Essex oil terminals at Grays and Thurrock

ANGLIA

ENVIRONMENT

PROTESTS

THURROCK

🕒 Tuesday 23 August 2022 at 2:58pm



*Just Stop Oil protesters blocked the road to the Navigator oil terminal in Thurrock, Essex.
Credit: Just Stop Oil*

Twenty arrests have been made after environmental protesters staged demonstrations at a major oil facility in Essex, digging tunnels under roads to block access.

The campaigners from Just Stop Oil formed a sit-down roadblock near the Navigator terminal in Thurrock early on Tuesday morning.

Five people are also occupying tunnels under St Clements Way near the terminal, as well as an access road leading to the nearby Grays oil terminal.

Twenty people have been arrested at the three sites on Tuesday morning, said Essex Police, while [similar protests were also staged at the Kingsbury facility in Warwickshire.](#)

Campaigners were protesting the government's plans to allow more oil and gas projects in the UK.



*The protesters are calling for an end to new oil and gas projects in the UK.
Credit: Just Stop Oil*

At that final site, there were reports of people at height, with police saying that they would need specialist equipment to bring them down safely.

Two arrests were made there, with 10 arrests at the site in St Clements Way and eight at Chafford Hundred Railway Station.

Insp Stuart Austin said police were "working to resolve these situations as quickly and safely".

He added: "We have plans in place to deal with incidents like these and have acted swiftly to deal with them and make 18 arrests so far.

"We are focused on keeping the county moving and keeping [people] safe.

"Road disruption is currently minimal and I'd like to thank local drivers, workers, and business for their patience.

"I want to be clear: policing is not anti-protest but we must intervene where there is a risk to life or where laws are being broken."

Catherine Rennie-Nash, 72, a retired teacher from Kendal, who was involved in the Essex protests, said: "I am beyond angry about the government's plans to allow more oil and gas projects in the UK. I have no choice but to be in civil resistance. We need to understand that the government isn't protecting us.

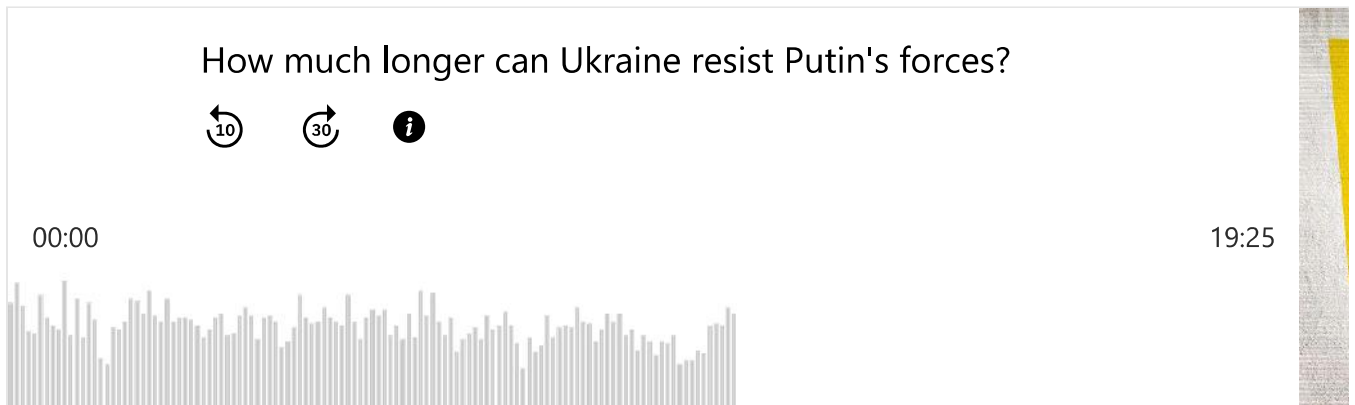
Sam Holland, 20, a student from Leeds who is also taking action in Essex, added: "Consenting to more fossil fuels is consenting to the collapse of our food systems. It is consenting to the collapse of our societies, and to the deaths of hundreds of millions of people."

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ANGLIA ENVIRONMENT PROTESTS THURROCK

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Roads closed as Just Stop Oil activists 'occupy tunnels' near Kingsbury terminal

Around 20 protesters were causing disruption at the Warwickshire site with reports four protesters were occupying tunnels

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Just Stop Oil demonstrators are protesting at Kingsbury Oil Terminal in Warwickshire (Image: Just Stop Oil)

138405386249

Roads were closed amid reports oil protesters had started digging them up in the latest demonstrations at a major Midland oil depot. Warwickshire's Kingsbury oil depot. Just Stop Oil protesters have occupied Trinity Road and Piccadilly Way, near the Kingsbury site, close to [Tamworth](#).

Four people were said to be occupying two tunnels. Officers from Warwickshire Police were at the scene and confirmed the roads had been forced to close due to the actions of the protesters. Just Stop Oil sent out a tweet and pictures of the protesters at Kingsbury and a site at the Grays oil terminal in Thurrock, Essex, where protesters were also demonstrating this morning, Tuesday, August 23.

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The tweet said: "BREAKING. 50 supporters of [#JustStopOil](#) have disrupted oil supplies from two critical oil facilities this morning in Essex and Warwickshire. It was also revealed that people are occupying four tunnels."

READ MORE: [Full list of strikes set to plague railways, post offices and courts this summer](#)

Just Stop Oil say it had around 20 protesters at Kingsbury and 30 more demonstrators at the Essex site.

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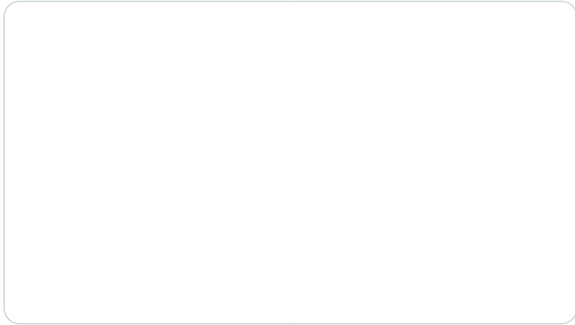
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Just Stop Oil confirmed demonstrators had blocked or attempted to block Trinity Road and Piccadilly Way, the two main access roads to the Kingsbury terminal. Two supporters of Just Stop Oil climbed on top of a tanker on Trinity Road after traffic was brought to a halt by the roadblocks.

It was the latest in a string of protests targeting the terminal and sites across the country. Just Stop Oil wants the Government to halt all new fossil fuel projects.

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Just Stop Oil supporters block critical oil terminals in Essex and Warwickshire with roadblocks and tunnels

Press / August 23, 2022

50 supporters of Just Stop Oil have disrupted oil supplies from two critical oil facilities this morning in support of their demand that the UK government end new oil and gas projects in the UK. [1]

Around 30 people are involved in the actions in Essex, which included establishing a roadblock on St. Clements Way, a key tanker route to and from the Navigator terminal and occupying the Grays oil terminal in Thurrock.

In North Warwickshire around 20 people have blocked or attempted to block Trinity Road and Piccadilly Way, the two main access roads to the Kingsbury Oil Terminal. Two supporters of Just Stop Oil climbed on top of a tanker on Trinity Road after traffic was brought to a halt by the roadblocks.

In addition it was revealed that five people are occupying two tunnels that have been dug under St Clements Way and London Road near the Inter Oil Terminal in Grays, Essex while four people are occupying a further two tunnels near the Kingsbury Terminal in Warwickshire. The tunnels are totally blocking access to Kingsbury and Navigator oil terminals.

Catherine Rennie-Nash, 72, a retired teacher from Kendal taking action today in Essex said:

"I am beyond angry about the government's plans to allow more oil and gas projects in the UK. I have no choice but to be in civil resistance. We need to understand that the government isn't protecting us. The cost of living crisis is a choice, sky-high fuel bills is a choice, new oil and gas is a choice. Government is allowing companies to steal our wealth and destroy our future, they are criminals.

Sam Holland, 20, a student from Leeds who is also taking action in Essex today said:

"Consenting to more fossil fuels is consenting to the collapse of our food systems. It is consenting to the collapse of our societies, and to the deaths of hundreds of millions of people. Make no mistake – those in power who have planned this will be tried for crimes against humanity."

Jeannie Donald-McKim, 58, a teacher from Witney, Oxfordshire joining the action near Kingsbury today said:

Our addiction to oil is fuelling climate collapse and causing the worst cost of living crisis in 40 years. People are getting desperate. We have run out of time for words. Now is the time for action. I urge everybody to step up and join us. This is the moment to come together and resist. We can do this. It's not too late to make a difference. Join us on October 1st in Westminster. "

Anna Holland, 20, a student at Newcastle University who is also joining the action near Kingsbury said:

If you're still debating whether to get involved in action against the government and the oil industry, ask yourself: do I want the rest of my life to look like this? Do I want this year – with the cost of living crisis, climate breakdown, deadly weather – to be the best year of the 2020s? Because that's the reality we face if we don't take action and make change now. "

We are not prepared to just watch while the government and fossil fuel industry destroy everything we love. We're done with begging. Voting changes nothing. We are going to stop new oil whether those in power agree or not. As citizens, as humans, as parents and children we have every right under British law to protect ourselves and those we love. This is the moment, we are the last generation that can solve this. Will you step up and join us? If we all come together we can do this. We can Just Stop Oil. Join us on October 1st in Westminster.

ENDS

Press contact: 07762 987334

High quality images & video here: <https://juststopoil.org/press-media>

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Youtube: <https://juststopoil.org/youtube> :

Notes to Editors

[1] Locations:

- Navigator Terminals Thames, Oliver Road, West Thurrock, Grays, Essex, RM20 3ED
- Inter Terminals UK Ltd, London Rd, Grays RM17 6YU
- Kingsbury Oil Terminal, Tamworth, B78 2HA

[2] About Just Stop Oil

Just Stop Oil is a coalition of groups working together to demand that the government immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK.

We must urgently end our reliance on fossil fuels to avoid irreversible changes in the earth's climate system. We cannot continue to burn fossil fuels in the belief that future developments in carbon capture and storage and other so-called "unicorn technologies" will allow us to suck vast quantities of carbon dioxide from the atmosphere.

The UK must begin this process immediately. It starts by calling a halt to any further fossil fuel projects on the UK Continental Shelf. That would give us eight years of fossil fuel production left in which to rapidly transition to a zero carbon economy.

Everyone knows we have to engage in massive changes. Just Stop Oil is a coalition of groups demanding the no-brainer things be done immediately – actions that will reduce the demand for fossil fuel energy dramatically such as insulating our homes, rethinking how we travel, getting on with renewable energy and making sure no-one is left behind.

We either come together as humanity or we die. Youth know which they choose. They have already chosen. They are in the streets to demand a future. We are all in the streets to make sure they get it. It's as basic as that.

Further information about Just Stop Oil and our demands here: <https://www.juststopoil.org>

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Suffolk Just Stop Oil activist Sam Johnson arrested by Essex Police in Grays after occupying tunnel

By [Suffolk News Reporter](#) - suffolk@iliffpublishing.co.uk

Published: 08:03, 05 September 2022 | Updated: 08:05, 05 September 2022

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A [Suffolk](#) climate activist is one of three people who have ended their occupation of a tunnel dug beneath an Essex road after 13 days.

Several Just Stop Oil campaigners were in the tunnel underneath St Clements Way in Grays – a key delivery route for the nearby oil terminal – since August 23, protesting against what they see as government inaction over the climate crisis.

The tunnellers, who voluntarily left the tunnel at around 3.45pm on Sunday, are demanding the government ends new oil and gas projects in the UK.



Left to right, Joe Howlett from Bath, Xavier Gonzalez-Trimmer from London and Samuel Johnson from Suffolk. Climate activists said they will not leave a tunnel dug beneath an Essex road until the Government makes a "meaningful statement" on halting future fossil fuel licences. Issue date: Friday September 2, 2022. Picture: Samuel Johnson/PA

Essex Police said three men are in custody after they were arrested on suspicion of causing a public nuisance and criminal damage



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Sam Johnson, 39, a groundworker from Suffolk, who was in the tunnel, said: "In July we experienced 40C heat for the first time in UK history and our emergency services could not cope.

"Just look at Pakistan – one third of the country was submerged by catastrophic floods and 33 million people have been displaced.

"This is the reality of climate collapse and it is happening here in the UK, it is happening all around the world and it is happening now. That is why we need to act now."

Xavier Gonzalez Trimmer, 21, who works in the climbing industry, was also in the tunnel and said: "I cannot stand by and watch while our government allows profiteering energy companies to drive us into poverty, destroy our jobs and wreak havoc on the climate.

"I will not stop until the government agrees to end new oil and gas."

Joe Howlett, 32, a musician and teacher from Bath, who was also in the tunnel, said: "We are demanding that the UK government stop all new licences and consents for fossil fuels in the UK.

"Join us in Westminster on October 1st. Just Stop Oil."

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Just Stop Oil said that from October 1 in Westminster it will be organising for what it says will be "the largest act of civil disobedience in UK history".

Chief Superintendent Simon Anslow said: "I'm pleased this situation has now been concluded.

"Over the course of the last fortnight we have made more than 60 arrests and worked hard with our partners to keep disruption to our local community and businesses to a minimum and keep Essex moving.

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Just Stop Oil: Eight arrests as Grays oil tanker blocked

🕒 30 August 2022

Climate change



RICHARD SMITH/BBC

Police said it had been a "busy week" dealing with various protests in Essex

Eight protesters were arrested after a road and an oil tanker were blocked.

Essex Police was called to St Clements Way in West Thurrock, Grays, at about 20:00 BST on Sunday.

One person climbed on top of the vehicle while others reportedly deflated its tyres. The road was closed but reopened at 03:00 on Monday.

Police said the protesters were arrested on suspicion of offences including going equipped to cause criminal damage, and were bailed.

Environmental campaign group Just Stop Oil said those involved were a number of "ordinary people" who had stopped the tanker in support of its cause.

The group wants the government to cut reliance on fossil fuel.

Last week, Just Stop Oil said activists had dug tunnels underneath the carriageway in Grays, which is a key delivery route for the nearby oil terminal.

Since then, it claims those inside the tunnel have broken through to the road surface.

Assistant chief constable Glen Pavelin, from Essex Police, said: "Following a busy week of protest activity, our priorities remain to keep Essex moving, keep people safe and minimise the disruption to the public.

"Two tunnels on Stoneness Road and St Clements Way remain occupied.

"The road at St Clements Way remains partially open, and Thurrock Council Highways Department are ensuring an overview of the road."

He said officers were continuing to engage with the protest group and invited it to start a conversation to find another way to protest.

Essex Police said Stoneness Road had re-opened on Monday night and Thurrock Council had begun repair works on the damage caused.

Also on Monday, two people were arrested on suspicion of conspiracy to commit public nuisance, and another person charged with intentionally or recklessly causing a public nuisance.

Police said officers had arrested a total of 60 people in connection with the protests over the last week.

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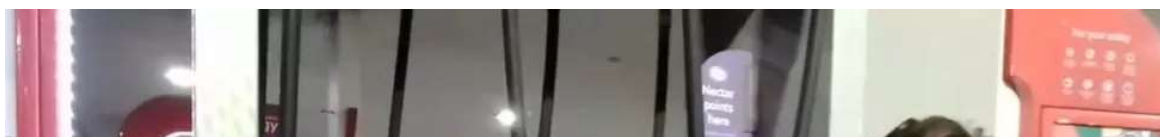
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Just Stop Oil protesters leave Grays tunnel after 13 days

🕒 4 September 2022

UK climate change protests



Three protesters were arrested after they left the tunnel, police said

Climate activists have ended a 13-day occupation of a tunnel dug beneath a road in Essex.

Three Just Stop Oil campaigners were in the tunnel under St Clements Way in Grays, where they had been protesting against what they see as government inaction over climate change.

They left voluntarily at about 15:35 BST, Just Stop Oil said.

Essex Police said three men were arrested on suspicion of causing a public nuisance and criminal damage.

The force said a cordon was in place and work to fill the tunnel would "commence shortly".

Just Stop Oil is calling on the government to end new oil and gas projects in the UK. The tunnel was below a key delivery route for the nearby oil terminal.

Sam Johnson, 39, a groundworker from Suffolk, was in the tunnel and said the recent heatwaves in the UK and flooding in Pakistan highlighted the need for action.

"This is the reality of climate collapse and it is happening right here in the UK, it is happening all around the world and it is happening now," he said in a statement published by Just Stop Oil.

"That is why we need to act now."

Ch Supt Simon Anslow said the recent protests, which were also held at service stations, had required a "huge amount of resources" from police.

"Over the course of the last fortnight we have made more than 60 arrests and worked hard with our partners to keep disruption to our local community and businesses to a minimum and keep Essex moving," he said.

"This work has required a huge amount of resources and has diverted officers from other duties such as the prevention and investigation of burglary, robbery, sexual, and violent crime.

"We are not anti-protest but will take action where the law is broken or people's safety is put at risk."

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Police arrest 23 at oil protests across Essex

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50 Just Stop Oil Supporters breach the Warwickshire injunction

Press / September 14, 2022

A group of 50 ordinary people are risking their liberty to sit peacefully outside the Kingsbury Oil Terminal holding banners, in breach of a private injunction designed to protect the profits of the oil industry. This is the first of a series of nonviolent actions in support of Just Stop Oil's demand that the UK government end new oil and gas projects in the UK.

The injunction granted to North Warwickshire Borough Council on 14th April, gives sweeping powers of arrest to the authorities and effectively outlaws any protest activity near the Kingsbury Terminal, the largest inland oil storage depot in the country.[1]

The Just Stop Oil supporters, many of whom have already taken action this year, are likely to face a charge of contempt of court. If found guilty they could be imprisoned for up to two years. Four people are

currently in prison for resisting the government's genocidal plans to encourage new oil and gas. [2]

Michelle Charlesworth, 55, a former human resources professional from Oxfordshire said:

"I would not be able to look my three year old grandson in the eye if I didn't do everything in my power to secure a liveable future for him. This is my purpose now. And not just for him, but for all of humanity. The government is condemning us all to starvation, misery and death if they don't stop licensing new oil and gas."

King Charles III spoke up about the climate crisis before we all realised how bad it was. Now he is king he has to be neutral, but how can you be neutral about climate collapse? He has said that he knows trusted hands will continue his work. I am responding to this call and I will continue to step up and do everything in my power to force the government to address the climate and cost of living crisis.

If you feel the same, will you join us and be this voice of reason in the chaos that is killing us all? Now is the moment to come together and resist. Join us in Westminster from 1st October."

Michelle is one of 25 people from Just Stop Oil who have already spent time on remand in police cells and in prison this year as a result of actions taken at the Kingsbury Oil Terminal. She spent 28 days in HMP Foston Hall in May 2022.

Rajan Naidu, 62, a social justice advocate from Birmingham said:

The government was elected to serve the will, needs and best interests of the people of Britain. Since we face climate and ecological collapse and a cost of living crisis, surely they must serve our best interests by stopping all new oil and gas immediately and investing in renewables, insulation and free public transport?

"The dangerously hot weather we had this year will be repeated, a bit worse and a bit longer next time. That will mean crop failure, ongoing food shortages and civil unrest. Does anyone, outside of the fossil fuel industry and politicians and political parties owned by big money interests, think carrying on with this suicidal fossil fuel economy is worth this level of risk?"

Zoe Cohen, 52, a self-employed mother from Warrington said:

"The Prime Minister and her cronies are up to their necks in oil – it's as if the board of Shell and BP are running the Cabinet! Is there even one of them who didn't used to work for, or isn't being bought by oil money? Ordinary people don't stand a chance!

"I'm an ordinary Mum who has voted in every election since I was 18 – it hasn't changed anything. And yet we know that humanity is capable of so much better! I have no choice but to be in nonviolent civil resistance against these people and their death project. Please join us in peacefully occupying Westminster from the 1st October onwards."

Since April 1st when supporters of Just Stop Oil first began blocking oil terminals there have been over 1300 arrests. The supporters of Just Stop Oil will continue the disruption until the government makes a statement that it will end new oil and gas projects in the UK.

As the government doubles down on fossil fuel energy by “ramping up supply” and breaks its manifesto commitment on fracking, Just Stop Oil supporters will continue to take nonviolent direct action to demand an end to this genocidal death project. We accept the consequences of our actions and we don't need you to feel sorry for us, we need you to step up and join us. [3] [4]

This is the moment to come together and resist. We are not prepared to just watch while they destroy everything we love. We're done with begging. Voting has changed nothing. We are going to stop new oil whether those in power agree or not. As citizens, as humans, as parents and children we have every right under British law to protect ourselves and those we love. This is the moment, we are the last generation that can solve this. Will you step up and join us? If we all come together we can do this. We can Just Stop Oil. Join us on October 1st in Westminster.

ENDS

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Notes to Editors

[1] https://www.northwarks.gov.uk/downloads/file/9139/injunction_order

[2] Still being held without trial for taking action with Just Stop Oil are: Joshua Smith, 29 from Manchester and Louis McKechnie, 21 from Weymouth, who have been on remand since July 7th and are expected to face trial in February 2023. Chris Bennet, 31 from Bristol, who occupied one of the Essex tunnels near the Navigator oil terminal. In addition one person is in prison for resisting the Southampton Heathrow pipeline.

[3] <https://www.gov.uk/government/speeches/pm-liz-truss-opening-speech-on-the-energy-policy-debate>

[4] <https://www.carbonbrief.org/factcheck-why-fracking-is-not-the-answer-to-the-uks-energy-crisis/>

About Just Stop Oil

Just Stop Oil is a coalition of groups working together to demand that the government immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK.

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'Just Stop Oil': Two Bristol women deliberately get jailed

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 Holly Exley and Chloe Naldrett, both from Bristol, who have been jailed for civil resistance as part of the Just Stop Oil campaign (Image: Bristol live)

Two women from Bristol have explained why they deliberately got themselves jailed for taking part in a mass civil resistance protest at one of Britain's biggest oil depots. Holly Exley, 34, and Chloe Naldrett, a 42-year-old mum of two, recorded video messages before they took part in the action and were arrested and jailed at the Kingsbury Oil depot last week.

They were among 51 protesters [from the 'Just Stop Oil' movement](#), calling for no more fossil fuel extraction in the UK, in the light of the dire warnings about climate change and global warming.

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Holly, an illustrator, and Chloe, a theatre producer, were remanded to prison for at least a week by high court judges in London and Birmingham as part of a mass arrest and imprisonment of the campaigners after they broke a court injunction preventing any blockages of the oil depot in the Midlands last week.

Read more: [Bristol Airport campaigners send video to Canadian teachers over expansion plans](#)

In a recorded message to her friends and family, and to the wider world, Chloe Naldrett said she had the support of her husband Joe and their two sons.

She added that, while some of her friends and family might be distressed and think that 'this is a really extreme thing to do', she said: "The Secretary General of the UN, has said that the real extremists are the governments and the big energy companies, who are continuing to pursue fossil fuel projects, in full knowledge of what that's doing to our future." Both women urged people to get involved in a mass civil resistance operation planned to take place in Westminster, London, on October 1.

The [arrests came last Wednesday, September 14](#), and a total of 51 people from around the country, along with three others detained earlier, were brought before the courts in London and Birmingham, to be remanded in custody for at least a week - because they refused to comply with the court proceedings.

In her statement, Holly Exley explained that filling up the police and court time was part of a strategy, because ordinary protesting had not worked.

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“By breaking the law, by getting arrested, by going through the courts, by spending time in prison, we’re putting pressure on the pillars of support, such as the police and the judiciary, which prop-up the current system which is doing us harm,” she said.

“What I say next might sound a bit harsh, but I just want to remind people that the people who have the power to stop this, and the power to change this, and the people that are allowing this to continue, are not looking at your cardboard sign,” she added. “They are not threatened by it, they are not convinced by it.”




▣ **Just Stop Oil protesters at the Kingsbury Oil Refinery** (Image: Just Stop Oil)

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"And they also are not debating your petitions. We've exhausted all other options. We've been asking politely for decades, and we've had the opposite of what we wanted. The whole time I've been alive on this planet, people have been asking nicely for things to change. The IPCC was set up in the year of my birth and it's gotten to the point now where the people who have been tasked with proving just how bad things really are, are now the ones who have to put their bodies on the line to force change," she added.

When they appeared in court on Thursday, September 15, none of the 51 arrested engaged in the court process. Some stood on court furniture, others turned their back on the judge, while one woman took off her top to reveal a slogan.



 Just Stop Oil protesters at the Kingsbury Oil Refinery (Image: Just Stop Oil)

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The action comes as sources in Downing Street reveal new Prime Minister Liz Truss is set to signal the end of a moratorium on fracking, and also in a speech said the UK should return to extract more North Sea oil and gas.

"This is the moment to come together and resist," said a Just Stop Oil spokesperson. "We are not prepared to just watch while they destroy everything we love. We're done with begging. Voting has changed nothing. We are going to stop new oil whether those in power agree or not. As citizens, as humans, as parents and children we have every right under British law to protect ourselves and those we love. This is the moment, we are the last generation that can solve this," they added.

Holly Exley's statement



 **Holly Exley from Bristol, who has been jailed for civil resistance as part of the Just Stop Oil campaign** (Image: Bristol live)

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"This video is only going to be uploaded and published if I find myself in prison, so seeing as you are watching this, I am now incarcerated in the UK and this video is my attempt to explain a little bit about why that might have happened.

"I'm sure that many of you in my audience are already aware and really concerned about the climate crisis, so I'm not going to spend too long on this section, mostly because it's really overwhelming and scary and I think we all know how bad things really are.

"In the UK it feels like things have got a bit worse, politically at least we have a new right wing PM who seems to view a habitable future through the lens of the culture wars. She used to work for Shell and she's promised that she will issue 130 new oil and gas licences, which is really brilliant news for BP and Shell, but really terrible news for everyone else.

"It's decisions like this that lock us into fossil fuel dependency for decades to come and that's really scary. I'm sure that in your countries, there are many similar stories as well.

"The international Energy Agency has said there can be no new fossil fuel extraction, the General Secretary of the UN has said there can be no new fossil fuel extraction. Climate scientists around the world are saying there can be no new fossil fuel extraction in increasingly gr

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EXHIBIT FL1 - 67

terms. And yet all around the world in the global north, in the rich nations, we are planning for extracting even more - and the emissions are still rising.



Just Stop Oil protesters at the Kingsbury Oil Refinery (Image: Just Stop Oil)

"Because of this grave situation that we find ourselves in, breaking the law by taking part in non-violent civil disobedience is one of the most important things we can do as citizens to affect change, and there are three reasons for that.

"The first one is strategically, by breaking the law, by getting arrested, by going through the courts, by spending time in prison, we're putting pressure on the pillars of support, such as the police and the judiciary, which prop-up the current system which is doing us harm.

"The second reason is morally. There is a moral imperative to resist a system that is harming us and others. I really like this quote by Martin Luther King. He said: "I'm convinced that non-cooperation with evil is as much of a moral obligation as cooperation with good.

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"And the last reason is relatively. Our actions need to be in relation to the scale of the crisis we face. Ask yourself, is your response relative to the scale of the danger that we are in? And are you using the privileges that you have? Previous tactics do not work. Protest alone doesn't

seem to work. David Graber once said: 'Protest is like asking for a well to be built by the powers that be, direct action is building a well yourself and daring the powers that be to stop you'.

"What I say next might sound a bit harsh, but I just want to remind people that the people who have the power to stop this, and the power to change this, and the people that are allowing this to continue, are not looking at your cardboard sign. They are not threatened by it, they are not convinced by it.

Just Stop Oil · Sep 18, 2022

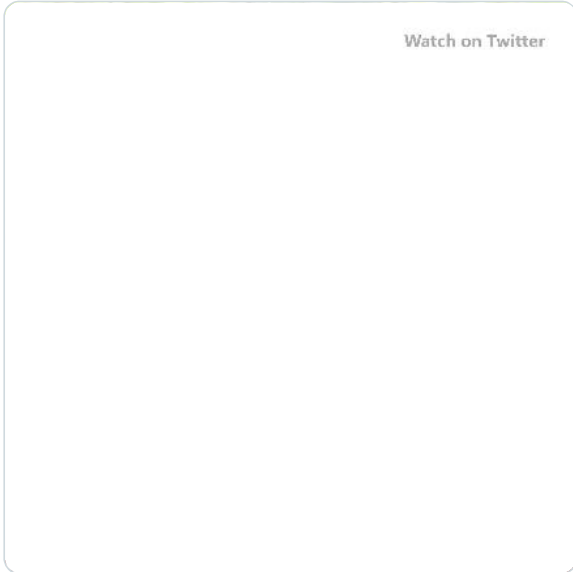


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[Part 1]

Holly Exley, an illustrator from Bristol, has been imprisoned for peacefully demanding that the Government stop licensing new oil and gas projects. She does not want your sympathy — she wants you to step up and occupy Westminster in October

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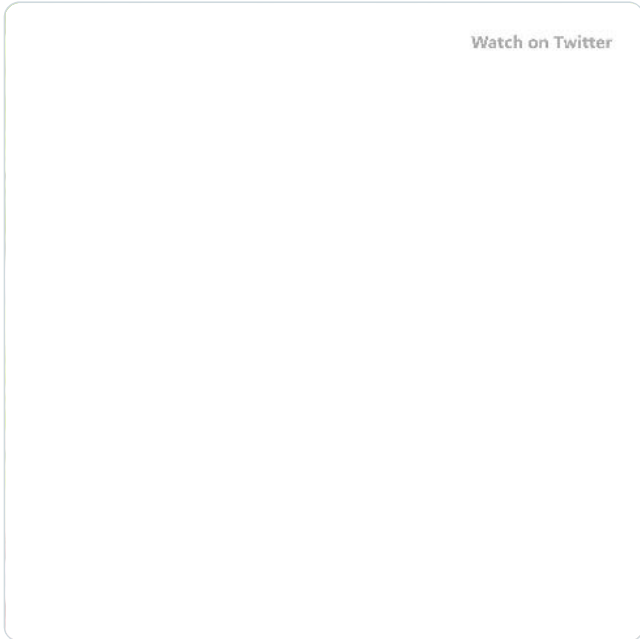


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[Part 2]

"We CAN radically shift our society away from fossil fuels- all that is needed is political will, spurred on by thousands of ordinary people stepping up and saying "enough is enough". That is why I am here, taking action and demanding the shift we so desperately need."



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4:29 PM · Sep 18, 2022



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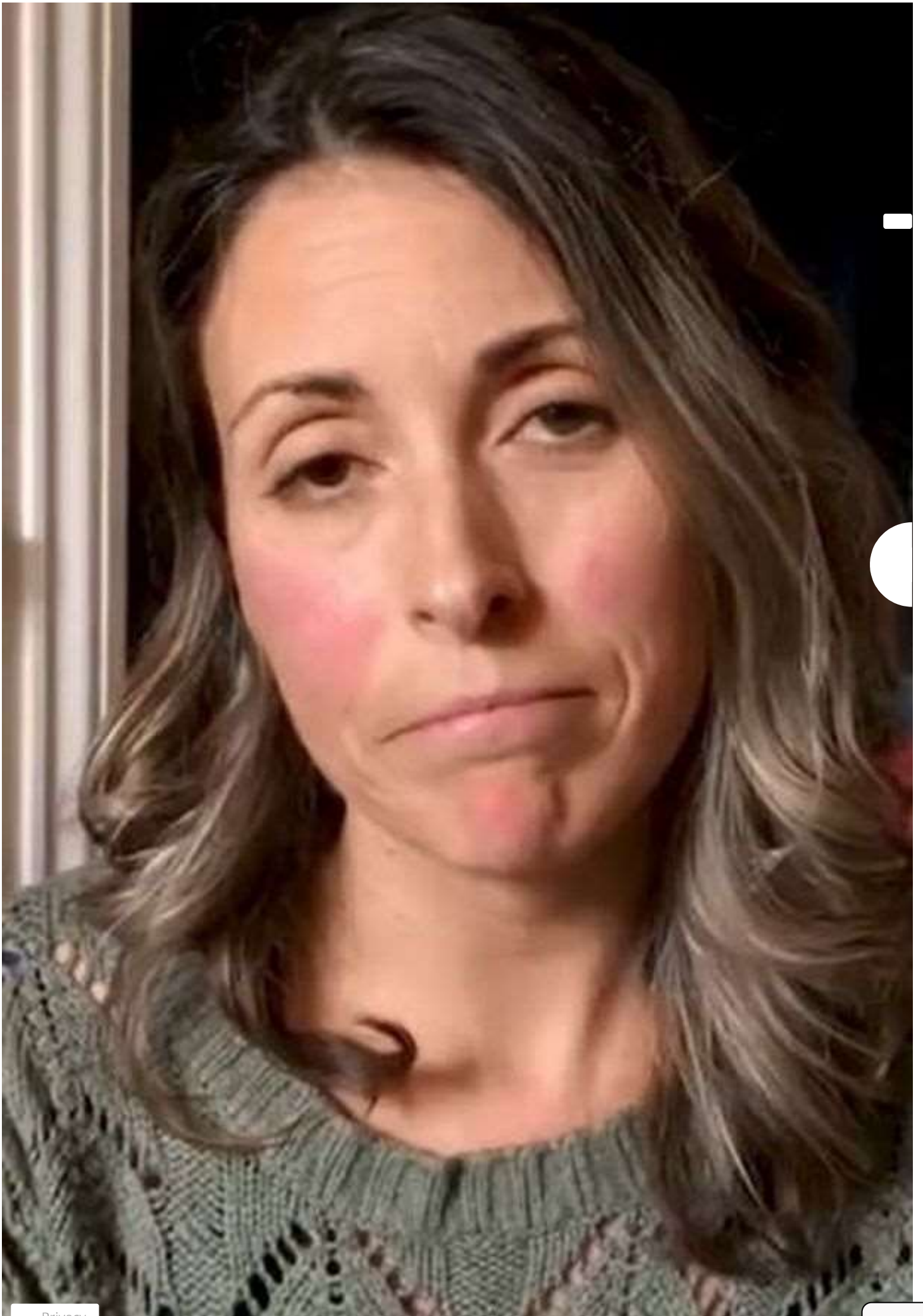
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...and they are not listening, our politicians have embraced an entire system that's been asking politely for decades, and we're not the opposite of what we wanted. The whole time I've been alive on this planet, people have been asking nicely for things to change. The IPCC was set up in the year of my birth and it's gotten to the point now where the people who have been tasked with proving just how bad things really are, are now the ones who have to put their bodies on the line to force change.

"And I just have to ask how we've allowed it to get to this stage. I'm personally really scared about the future and I'm really devastated about extreme weather events happening to people around the world - people that have done the least to deserve this, and the people with the smallest carbon emissions, those in the global south, who are having their lives destroyed by the climate crisis that is there with them now, and our leaders only want to make it worse for them.

"So I'd like to ask you to please join Just Stop Oil on October 1 in Westminster for the largest act of civil resistance in UK history, and if you're international, please look up civil resistance campaigns in your country, and please support Just Stop Oil in any way you can."

Chloe Naldrett's statement



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F/1/308


EXHIBIT FLT - 72

Chloe Naldrett, from Bristol, who has been jailed for civil resistance as part of the Just Stop Oil campaign (Image: Bristol live)

"If you're watching this video, I'm in prison. And I'm in prison because of action that I have consciously taken as part of a campaign of civil resistance against this Government, because of their mishandling of the climate and cost of living crisis, and their refusal to mobilise behind renewable energy and home insulation, which will be part of the solution to both of those problems.


I've taken this action alongside a great number of ordinary people like me: Doctors, social workers, farmers, students, vicars, retired teachers - all of whom have been prepared to stand up at this moment and say that we will not accept the trading of our children's futures for short term profit.

I know that some of my family and friends will find this distressing, and that they will think that this is a really extreme thing to do. Antonio Guterres, the Secretary General of the UN, has said that the real extremists are the governments and the big energy companies, who are continuing to pursue fossil fuel projects, in full knowledge of what that's doing to our future.




Just Stop Oil 
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Chloe Naldrett, a Theatre Producer from Bristol, has been imprisoned for breaching a private injunction protecting the corporate interests of Kingsbury Oil Terminal.

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I need to say to you all that I'm okay. I've done this with a huge amount of support, including the support of Joe and my boys. And I know exactly what I'm doing and why. If you'd like to support me further please share this video, step into a conversation with family and friends about why someone you know has gone to prison. And please look up Just Stop Oil, so you can see more about this campaign of civil resistance, that thousands of people are joining in with.

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Police arrest 51 Just Stop Oil protesters at Kingsbury Oil Terminal

A 71-year-old protester from Balsall Heath said he was standing up 'for the people dying back home in Pakistan'

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A group of 51 climate change protesters were arrested at a Midlands oil terminal after they breached a High Court injunction. Demonstrators from [Just Stop Oil](#) sat across the main entrance to Kingsbury Terminal near [Tamworth](#) for over five hours on Wednesday, September 14.

It was the latest in a series of protests at the Kingsbury site - one of several terminals targeted across the country in recent months, which have led to some petrol shortages and hundreds of arrests. [A High Court judge in April](#)

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2

F/1/310

EXHIBIT FLT - 74

granted an injunction giving police additional arrest powers at the Trinity Road depot.

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However activists said on Wednesday afternoon they had 'accepted the consequences' and were willing to 'risk their liberty' for their cause. The group is calling on the British government to end new oil and gas projects in the UK.

Read more - [Protesters send message to King Charles as arrests under way at Kingsbury Terminal injunction](#)

A 71-year-old protester spoke on the phone to BirminghamLive as he 'waited to be arrested' by police on Wednesday afternoon. Rajan Naidu, from [Balsall Heath](#), said he was making a stand 'for the people dying back home in Pakistan' as a result of catastrophic flooding.

He said: "We've been here for about five hours now and police have just started arresting us. We are deliberately breaking the injunction. This is what we have to do in order to raise the profile of this issue. We're doing this for the sake of our children.



Just Stop Oil protest at Kingsbury Oil Terminal.

[View gallery](#) 📷

"This is very important to people in Birmingham of south-Asian heritage. We're doing this for the people who are dying back home in Pakistan. This isn't an issue that we are trying to prevent - we are already suffering from climate change. Our people are dying and we are grieving, and it's only going to get worse."



Telford pensioner is jailed for oil terminal protest

By [Sue Austin](#) | [Telford](#) | Published: Sept 28, 2022 | Last Updated: Sept 28, 2022

A Telford pensioner has been jailed for protesting outside an oil terminal.

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F/1/312

EXHIBIT FL1 - 76



Just Stop Oil supporter Barry Mitchell, aged 74, was sentenced to 70 days in prison, reduced to 24 days for early admission of guilt and time served, for his third breach of an injunction ordering him not to protest outside the Kingsbury Oil Terminal in north Warwickshire. He was also ordered to pay costs of £1,180.

Mitchell said he was sitting peacefully outside the Kingsbury Oil Terminal to demand an end to new oil and gas projects in the UK.

The Just Stop Oil supporters who appeared before Judge Kelly at Queen Elizabeth Court in Birmingham on Tuesday and Wednesday, were accused of breaking the North Warwickshire injunction on September 14.

Also jailed was Michelle Charlesworth, 55, a former human resources professional from Oxfordshire. She was sentenced to five months in prison after being found guilty of her third breach of the Warwickshire injunction. She was ordered to pay costs of £1,415. Her sentence is reduced by 26 days for the time she has already served on remand and she is likely to serve over two months.

Five other protestors received suspended jail sentences.

A spokesperson from Just Stop Oil said: "Twelve days ago more than 50 ordinary people who were demanding urgent action to address the climate crisis were sent to jail in one day. This week there are eight Just Stop Oil supporters in prison. But we will not stop."

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EXHIBIT FLT - 77

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Exeter grandmother arrested in Just Stop Oil Protest

She was one of 50 arrested following a protest at the Kingsbury oil terminal

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EXHIBIT FL1 - 78

The group was jailed on remand for breaking the injunction against protest at Kingsbury taken out in April after previous blockades, giving police additional powers of arrest outside the terminal.

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As the Intergovernmental Panel on Climate Change has declared 'Code Red for Humanity', the group said, they "accepted the consequences of their actions" and risked their liberty to block the terminal.

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Julia said: "I've had an amazing life with so many privileges. Now it's payback time." (Image: Just Stop Oil)

9+

Breaching the injunction carries a maximum prison sentence of two years, however despite the risks involved, Julia says "I don't have a choice" and "now it's payback time".

...ed occupational therapist who previously lived in Bovemoors Lane said: "I've had an amazing life with so m

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EXHIBIT FL1 - 80



...this is something I can do. I am part of a wonderful supportive community of civil disobedience which is challenging the lies and evasions of those in power."

Now living in Todmorden, Yorkshire, with her husband, Julia has eight grandchildren between ages 23 and 9 months. She loves gardening and was a member of Exeter Community Agriculture. She helps make videos of dramatized Bible Stories to spark discussion in schools. Part of her motivation is the 'sheer injustice of climate breakdown'.

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The Just Stop Oil actions began on 1st April, coinciding with loss of the energy price cap which saw household energy bills rise by 54% overnight, resulting in an increase of millions in fuel poverty (Image: Just Stop Oil)

Julia said "I look at my 9-month-old granddaughter and try to imagine the world as it could very well be when she is my age I find I cannot do this; it's simply too painful a future to contemplate for her. I will do anything within my power to change this: it's the inertia and unholy power of business as usual that creates this future and it's this that we challenge in the courts and on the streets."

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"I can no longer ignore what's happening to the people of our world who did the least to create it and yet are suffering the most. There are too many hideous examples. One that breaks my heart is that in Bangladesh as the seawater rises it salinates fresh drinking water and pregnant women are miscarrying their babies. I absolutely owe it to these women to be on the streets shouting for justice."

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LOADING

50 arrests have been made following protests (Image: Just Stop Oil)

The Just Stop Oil group opposes the issue of new North Sea drilling licenses and reversal of the manifesto commitment on fracking.

The Chair of the Climate Change Committee, Lord Deben together with the Chair of the National Infrastructure Commission Sir John Armitt wrote to the new Prime Minister this month, urging rapid climate action

“The best policies for the consumer are those that support lasting energy security and a low carbon, low-cost energy system. Our gas reserves – offshore or from shale – are too small to impact meaningfully the prices faced by UK consumers.”[2]

Julia, with some of the other defendants, will appear in court on September 23rd in London. The 51 remanded on Wednesday join three other Just Stop Oil supporters currently held in prison without trial. Since April 1st when supporters of Just Stop Oil first began blocking oil terminals there have been over 1350 arrests.

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Just Stop Oil protests live as police make arrests at Kingsbury Terminal injunction

Just Stop Oil staged their first protest outside the Midlands oil terminal since King Charles III was proclaimed sovereign

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September 14.

The action group called on the British government to end new oil and gas projects in the UK. The Kingsbury site has been targeted repeatedly by campaigners in recent weeks, which has led to some petrol shortages and around 200 arrests at this terminal alone.

A High Court judge in April granted an injunction giving police additional powers of arrest outside the terminal and at the junctions of nearby roads. But protestors said on Wednesday afternoon they had 'accepted the consequences' of their actions and were 'risking their liberty' to block access to the terminal.

Read more - Birmingham mystery smell: Top 10 theories as to where pong came from

The penalty for breaching the injunction is up to two years' imprisonment. This is the group's first protest at the Kingsbury Terminal since King Charles III was proclaimed sovereign following the death of Her Majesty Queen Elizabeth II on Thursday, September 8.

Referring to Charles' speech at the Cop26 summit in Glasgow last November, Just Stop Oil activist Michelle Charlesworth, 55, said: "King Charles III spoke up about the climate crisis before we all realised how bad it was. Now he is ... he has to be neutral, but how can you be neutral about climate collapse?"

"He has said that he knows trusted hands will continue his work. I am responding to this call a ... will continue to step up and do everything in my power to force the government to address the climate and cost of living crisis."

Police previously urged anyone against taking part in any protest activity at the terminal. This is a live blog and will be updated as the situation develops.

KEY EVENTS

'Our people are dying' says protester waiting arrest 17:55

Arrests being made 16:51

17:55

KEY EVENT

'Our people are dying' says protester waiting arrest

A 71-year-old Just Stop Oil protester spoke to BirminghamLive as he 'waited to be arrested' for breaching a High Court injunction at Kingsbury Oil Terminal.

Rajan Naidu, from Balsall Heath, claimed that 20 demonstrators had been arrested so far at the Midlands site in connection to climate change protests taking place this afternoon.

Around 50 activists were reported to be blocking the main entrance to the terminal.

Rajan said: "There have been over 20 arrests so far and around 30 of us left waiting to be arrested.

"This is all part of a Just Stop Oil campaign against new oil and gas projects in the UK. We've been here for about five hours now and police have just started arresting us. We are deliberately breaking the injunction."

He added: "This is what we have to do in order to raise the profile of this issue. We're doing this for the sake of our children.

"This is very important to people in Birmingham of south-Asian heritage. We're doing this for the people who are dying back home in Pakistan. This isn't an issue that we are trying to prevent - we are already suffering from climate change. Our people are dying and we are grieving, and it's only going to get worse."





138415682727

16:51

KEY EVENT

Arrests being made

Warwickshire Police has confirmed that arrests are being made at the Kingsbury Oil Terminal, where Just Stop Oil protests are being held today in breach of a High Court injunction.

Speaking to BirminghamLive, a spokesperson for the climate change action group said that protesters had arrived just over an hour ago and were beginning to make arrests. They said: "There are 51 protesters in the road today so it's going to take some time if they plan on arresting them all."

A police spokesperson said: "We have made a number of arrests at the site on suspicion of breaching the court order." The force said it would confirm the number of arrests once suspects had been booked into custody.



16:15

EMILY COLLIS

Pictures from today's protest

Pictures show Just Stop Oil protesters sat across the main entrance to the Kingsbury Oil Terminal today. It's reported that 51 demonstrators have been at the site over the course of the afternoon.

See a gallery of photos below:



16:09

EMILY COLLIS

What the injunction means

A High Court judge granted an injunction in April giving police additional powers of arrest outside the terminal and at the junctions of nearby roads.

Warwickshire Police said powers would be used to prevent and disrupt any unlawful activity.

Breaching this injunction can carry a maximum penalty of two years' imprisonment.

Assistant Chief Constable Dave Gardner said previously: "I would strongly advise against people coming to Kingsbury to conduct any protest activity.

"Although the force respects the right to the peaceful protest, we will always take action against anyone found to be acting outside of the law.

"If you are believed to be in breach of the order, officers will arrest you and you will be taken into police custody until you have to appear before the courts."



5

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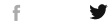


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50 protesters block terminal entrance

A group of around 50 demonstrators from the Just Stop Oil climate change group have gathered at the entrance of the Kingsbury Oil Terminal near Tamworth this afternoon. They arrived around lunchtime and were seen sitting across the main entrance to the site and holding banners.

Activists say this is the first in a latest series of protests calling on the British government to end new oil and gas projects in the UK. The action constitutes of a High Court injunction made in April, giving police additional powers of arrest outside the terminal and at the junctions of nearby roads.



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One Just Stop Oil supporter jailed while 10 walk free after peaceful resistance at Kingsbury Oil Terminal

Press / September 21, 2022

One Just Stop Oil supporter who appeared in a Birmingham court yesterday was sent back to prison and another 10 were given suspended sentences for sitting peacefully outside the Kingsbury Oil Terminal to demand an end to new oil and gas projects in the UK. [1]

The 12 Just Stop Oil supporters, who appeared before Her Honour Judge Kelly at Queen Elizabeth Court in Birmingham yesterday, were accused of breaking the North Warwickshire injunction on 14th September. The private injunction appears designed to help the state protect the profits of the oil industry by effectively outlawing any protest activity near the Kingsbury Oil Terminal. [2] [3]

Rajan Naidu, 71 a civil rights advocate from Birmingham was sentenced to 34 days in prison, after being found guilty of his third breach of the injunction. He will serve at least half of that time. He has already spent time on remand this year after breaching the Warwickshire injunction in May.

El Litten, 34, a web developer from Luton, once again refused to comply with court proceedings and was sent back to prison awaiting a further trial.

A further 10 Just Stop Oil supporters – Zoe Cohen, Jill Bird, Pam Williams, Sue Sidey, Sue Hampton, Ruth Jarman, Peter Morgan, Eric Hoyland, Catherine Rennie-Nash and Diana Hekt – were given sentences

varying from 25–34 days, suspended for 2 years plus individual costs in excess of £400. [4]

El Litten, 34, a web developer from Luton, speaking prior to taking action last week, said:

“I’m doing this because I don’t want to be part of a society which is choosing to cause massive and unnecessary harm – where fossil fuel companies make record profits while people die of cold, where lies and denial take precedence over truth, and where business as usual continues blindly on while catastrophes happen around the world.”

“Things are not right – the system is broken. Globally, the worst effects are also landing on those who have done the least to cause them – it is so wrong, and so unjust.”

“Our society allows politicians and businesses to lie with impunity, to make pretty speeches and adverts to misrepresent and mislead, while the truth is that their actions and decisions are causing harm and death on a massive scale.”

Sue Sidey, 57, a former government scientist from Bath said:

“I took action because the UK government is wilfully ignoring the science and abjectly failing in its duty to protect its citizens. As we speed towards multiple climate tipping points, the UK government is indulging in economic and moral madness by issuing new oil and gas licenses.

We are seeing the effects of the climate and ecological crisis all around us and these effects will only get worse. Please don’t be a bystander. Now is the time for civil resistance. Join Just Stop Oil in Westminster from October 1st.”

The 12 were among 51 Just Stop Oil supporters remanded to prison last Friday after they had refused to comply with court proceedings and informed the court that they would break the injunction again. A further group of 10 Just Stop Oil supporters will appear in the Birmingham court from 10am today. [5] [6]

Last week there were 56 ordinary people in prison for resisting new oil and gas projects, today that number falls to 46. [7]

Since April 1st when supporters of Just Stop Oil first began blocking oil terminals there have been over 1350 arrests.

As the government doubles down on fossil fuel energy by “ramping up supply” and breaks its manifesto commitment on fracking, Just Stop Oil supporters will continue to take nonviolent direct action to demand an end to this genocidal death project. We accept the consequences of our actions and we don’t need you to feel sorry for us, we need you to step up and join us. [3] [4]

This is the moment to come together and resist. We are not prepared to just watch while they destroy everything we love. We're done with begging. Voting has changed nothing. We are going to stop new oil whether those in power agree or not. As citizens, as humans, as parents and children we have every right under British law to protect ourselves and those we love. This is the moment, we are the last generation that can solve this. Will you step up and join us? If we all come together we can do this. We can Just Stop Oil. Join us from October 1st in Westminster.

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: <https://juststopoil.org/press-media>

Website: <https://juststopoil.org/>

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Youtube: <https://juststopoil.org/youtube>

Notes to Editors

[1] Just Stop Oil is a coalition of groups working together to demand that the government immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK. More information here: <https://juststopoil.org/>

[2] <https://juststopoil.org/2022/09/14/50-just-stop-oil-supporters-breach-the-warwickshire-injunction/>

[3] The charge of contempt of court relates to breach of the North Warwickshire injunction. https://www.northwarks.gov.uk/downloads/file/9139/injunction_order

[4] In court in Birmingham yesterday : Rajan Naidu, 71 from Birmingham, El Litten, 34 from Luton, Zoe Cohen, 52, from Warrington, Gillian Bird, 67 from Bristol, Pamela Williams, 74, from Llanidloes, Susan Sidey, 57, from Bath, Susan Hampton, 66, from Berkhamsted, Ruth Jarman, 59 from Hampshire, Peter Morgan, 74, from Birmingham, Eric Hoyland, Catherine Rennie-Nash, 72 from Kendal, and Diana Hekt, 68, from West Yorkshire

[5] <https://juststopoil.org/2022/09/15/51-just-stop-oil-supporters-jailed-after-mass-civil-resistance-in-court/>

[6] Sheila Shatford, Tez Burns, Charlotte Kirin, Mary Adams, Jerard Latimer, Darcy Mitchel, George Oakenfold, Michelle Charlesworth, Anthony Whitehouse, Chloe Naldrett. Further committal hearings this week; Wednesday 21st, Thursday 22nd September at Birmingham Crown Court, Queen Elizabeth II Law Courts. Address: 1 Newton Street, Birmingham, B4 7NA.

[7] In addition to those on remand in connection with breaches of the Kingsbury injunction there are a number of people still being held without trial for taking action with Just Stop Oil: Joshua Smith, 29 from Manchester and Louis McKechnie, 21 from Weymouth, who have been on remand since July 7th and are expected to face trial in February 2023 and Chris Bennet, 31 from Bristol, who occupied one of the Essex tunnels near the Navigator oil terminal. In addition, Xavier Gonzalez-Trimmer, who occupied one of the Essex tunnels near the Navigator oil terminal is due in court in London today.

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Breaking: 'Just Stop Oil' youth campaigners deliver ultimatum to Boris Johnson

Press / February 14, 2022

Neutral Citation Number: [2022] EWHC 2777 (KB)

Case No: QB-2022-001236

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

Sitting at:
Birmingham Crown Court
1 Newton Street
Birmingham
B4 7NR

Tuesday, 27 September 2022

BEFORE:

HER HONOUR JUDGE EMMA KELLY
(Sitting as a Judge of the High Court)

BETWEEN:

NORTH WARWICKSHIRE BOROUGH COUNCIL

Claimant

- and -

(1) EL LITTEN
(2) CHARLOTTE KIRIN
(3) TEZ BURNS
(4) MICHELLE CHARLESWORTH
(5) SHEILA SHATFORD
(6) MARY ADAMS

Respondents

MR MANNING and **MS CROCOMBE** appeared on behalf of the Applicant
The Respondents appeared in person

APPROVED JUDGMENT

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LIABILITY JUDGMENT

1. JUDGE KELLY: This is an ex tempore judgment following the trial of an application by the claimant, North Warwickshire Borough Council, to commit El Litten, Charlotte Kirin, Michelle Charlesworth, Tez Burns, Sheila Shatford and Mary Adams for contempt of court.
2. The claimant is represented by Mr Manning and Ms Crocombe of counsel. All the defendants act in person. Each has been repeatedly advised during these proceedings that they are entitled to seek legal advice and representation, but each wished to proceed without legal representation. Each has undertaken their own advocacy during the course of the trial.

Background

3. Kingsbury Oil Terminal is a large inland oil terminal located near Tamworth in Warwickshire. In the spring of 2022, various protests took place at the site against the production and use of fossil fuels, leading the claimant to apply for an interim injunction to protect the terminal. On 14 April 2022, Sweeting J granted a without notice interim injunction against various named defendants and persons unknown. None of the six defendants before the court today were named defendants. The “persons unknown” were defined as being those “who are organising, participating in or encouraging others to participate in protests against the production and/or use of fossil fuels in the locality of the site known as Kingsbury Oil Terminal...” Pursuant to section 27 of the Police and Justice Act 2006, a power of arrest was attached to the injunction.
4. On 5 May 2022 an on notice hearing took place before Sweeting J. Some of the named defendants were represented at that hearing. Sweeting J amended the interim order of 14 April and removed what had been described as a 5 metre buffer zone around the perimeter of the terminal site. That variation was drawn into an order dated 6 May 2022. Sweeting J reserved judgment in relation to the remaining issues that had been raised at the hearing. That reserved judgment has not yet been handed down. For the purpose of this judgment I will refer to the order of 6 May 2022 simply as "the injunction".
5. The injunction has a penal notice attached in the usual terms. Paragraphs 1(a) and 1(b) of the order prohibit certain conduct. By paragraph 1(a):

"The defendants SHALL NOT (whether by themselves or by instructing, encouraging or allowing any other person):

(a) organise or participate in (whether by themselves or with any other person) or encourage, invite or arrange for any other person to participate in any protest against the production or use of fossil fuels at Kingsbury Oil Terminal (the ‘Terminal’), taking place within the areas, the boundaries of which are edged in red on the map attached to the order at Schedule 1."

6. The map attached at Schedule 1 has a red boundary line running largely round the perimeter of the oil terminal adjacent to Trinity Road and on an additional site adjacent to Piccadilly Way. The area falling within the red line includes a private access road leading to the entrance of the oil terminals.

7. By paragraph 1(b) of the injunction:

"The defendants SHALL NOT (whether by themselves or by instructing, encouraging or allowing any other person):

...

1(b) In connection with any such protest anywhere in the locality of the Terminal performing any of the following acts:

...

(iii) obstructing of any entrance to the Terminal.

...

(xi) instructing, assisting, encouraging any other person to do any act prohibited by paragraphs (b)(i)-(x) of this Order."

8. By paragraph 3 of the injunction the order and power of arrest shall continue until the hearing of the claim unless previously varied or discharged by further order of the court. The order has not been subsequently varied or discharged. Indeed, as I have already indicated, the reserved judgment from the hearing on 5 May has not yet been handed down.

9. Paragraph 5 of the injunction gives the claimant permission to serve the claim form and supporting documents and the order and power of arrest by alternative methods specified at Schedule 2. Paragraph 1 of Schedule 2 states:

"Service of the claim form and this order shall be effected by:

- (i) placing signs informing people of:
 - a. This claim,
 - b. This order and power of arrest, and the area in which they have effect and
 - c. Where they can obtain copies of the claim form, order and power of arrest, and supporting documents used to obtain this order

in prominent locations along the boundary of the buffer zone referred to at para. 1 of this order and particularly outside the terminal and at the junctions of roads leading into the zone.

- (ii) Placing a copy prominently at the entrances to the terminal.

- (iii) Posting a copy of the documents referred to at para. 1(i)(c) above order on its website and publicising it using the claimant's Facebook page and Twitter account, and posting it on other relevant social including local police social media accounts, and/or
 - (iv) any other manner as the claimant may decide to use to bring the claim form and this order and power of arrest to the attention of the defendants and other persons likely to be affected.”
- 10. It is not in dispute that on 14 September 2022 the six defendants, along with 45 others, were arrested on a private access road leading to the terminal, just off Trinity Way. All 51 of the defendants were produced before the court on 15 September when their cases were adjourned to various dates last week when more court time was available to progress the cases and to allow time for the defendants to obtain legal advice and representation. At the hearing on 15 September all 51 defendants were remanded in custody because they each adopted the same position, namely that they did not accept the authority of the court and each indicated that, if bailed, they would breach the injunction and not voluntarily return to court. Last week, 45 of the defendants admitted contempt. One defendant's case was further adjourned to allow further time for him to obtain legal advice. The remaining six defendants before the court today did not admit the alleged breach and thus a trial has taken place today.
- 11. On 15 September 2022 the claimant provided each defendant with written particulars of the alleged contempt together with details of their rights as summarised in CPR 81.4(2). There are four allegations but all arise out of the same facts:
 - “1. Participating in a protest at the terminal, and within the boundaries of the area demarcated in Schedule 1, against the production or use of fossil fuels, contrary to paragraph 1(a).
 - 2. Encouraging others to participate in the protest at the terminal, and within the boundaries of the area demarcated in schedule 1, against the production and use of fossil fuels, contrary to paragraph 1(a).
 - 3. Obstructing an entrance to the terminal, within the locality of the terminal and in connection with the protest against the production or use of fossil fuels, contrary to paragraph 1(b)(iii).
 - 4. Instructing, assisting or encouraging each other to obstruct an entrance to the terminal within the locality of the terminal and in connection with a protest against the production and use of fossil fuels, contrary paragraph 1(b)(xi).”
- 12. During the course of the trial the claimant indicated it did not wish to proceed with the second allegation of breach and thus I will not consider allegation 2 further.
- 13. Prior to today, the defendants had made no admissions to the allegations. However, in giving oral evidence, each of them has largely accepted the claimant's factual case. I therefore proceed on the basis that each defendant to puts the claimant to proof. Furthermore, the defendants submit that the court should not enforce the injunction on the basis that it is an unjust order made in breach of their Article 10 and 11 rights or otherwise not to be enforced in light of the climate emergency that each has described in their evidence.

Legal Principles

14. These are contempt proceedings and therefore I remind myself that the burden of proof rests upon the claimant to prove its case to the criminal standard of proof, namely beyond reasonable doubt. In other words, I must be sure that the claimant has proved its case.
15. A number of courts have considered the correct approach to take to contempt proceedings. I am mindful of the guidance given by the Divisional Court in *National Highways Limited v Buse* [2021] EWHC 3404. That again was a case which dealt with contempt proceedings in the context of a protest. At paragraphs 23 and 24 of the judgment, it was held as follows:

"23. In order to establish a contempt of court the claimant must make the court sure that the defendants: (1) knew of the order; (2) committed acts which breached the order; and (3) knew that they were doing acts which breached the order, see *Varma v Atkinson* [2020] EWCA Civ 1602."

24. Although articles 10 and 11 of the European Convention on Human Rights and Fundamental Freedoms, to which domestic effect was given by the Human Rights Act 1998, are engaged, this is not relevant to the issue of whether the protestors acted in breach of the order. This is because when imposing the order the judge will have taken into accounts the rights of the protestors to protest, and balanced those interests against the rights of others in deciding whether to make the order, breach of which has penal consequences."

The evidence

16. The claimant relies on four witnesses. Mr Clive Tobin, the claimant's head of legal services and three police officers, Trainee Detective Constable Miles, PC Rowton and PC Dunn. Earlier in the proceedings I gave permission for the claimant to rely on witness statement rather than affidavit evidence. Each of the four witnesses has given oral evidence today. I have also seen video footage taken from body worn cameras of PC Rowton and PC Dunn.
17. Mr Tobin's written evidence sets out the steps he took to ensure that service of the order was effected by the alternative means specified in the order by Sweeting J. He described placing laminated copies of the order and power of arrest in the vicinity of the site at 11 different occasions on 24 August 2022 and placing 16 A2 size laminated notices around the site on 26 August. He then detailed the steps he took on 2 September when he returned to the site with more durable copies of signage again providing details of the claim, the injunction, the power of arrest and where copies of the claim form could be obtained. He exhibited to his written evidence a number of photographs and details of the GPS coordinates as to where he placed the various copies. The claimant also relies on a certificate of service detailing the circumstances in which the injunction was served via the claimant's website and various social media accounts. Ms Shatford was the only

defendant to cross examine Mr Tobin. She sought clarification from Mr Tobin as to whether a grass verge was included in the area covered by the injunction. Mr Tobin stated that the private road was covered but there was an area of grass to the right of the entrance that fell outside the red boundary line.

18. Trainee Detective Constable Miles then gave evidence. The police officer's written statement exhibited copies of photographs and video footage that she had accessed from Just Stop Oil's website and social media platforms. Extracts of the video were played in court and which showed footage of a large number of protesters sitting in the roadway blocking the entrance to the oil terminal. An individual is heard to provide a commentary on one of the videos including reference to hearing hoots of support from some passing motorists and negative responses from other motorists. She was not cross-examined.
19. In his written evidence, PC Rowton explained that he attended the terminal site at about 3.30 in the afternoon on 14 September and saw multiple people sitting across the entrance to the oil terminal holding banners and wearing high viz jackets. He states he was the officer who arrested Tez Burns and then, later in time, Sheila Shatford, El Litten, Mary Adams and Charlotte Kirin. He exhibited his body worn camera footage showing the arrests. In his oral evidence he explained that the time shown on the body worn camera video footage was one hour behind the actual time.
20. Ms Adams cross-examined PC Rowton. The officer accepted that he had no previous experience in policing climate protests. He explained that police dog units had been called by the superintendent who had told any available police officer to attend the incident. The dogs were not there because there was any particular resistance from the protestors. He explained that the public roads in the vicinity had been closed for reasons of safety of the officers and of the protestors. Ms Shatford cross-examined PC Rowton about what, if any training, he had received as to policing environmental activism. The officer stated that stated that, as part of his officer safety training, he had been taught how to deal with groups and the five-step appeal process to adopt. He accepted he had not received specific training regarding environmental activism.
21. PC Dunn was the final police witness. In his written evidence he stated that he had arrived on site at about 12 noon by which point the protestors were sitting in the junction at the entrance to the oil terminal stopping people entering and exiting via car. He described seeing several banners with "Just Stop Oil" wording and a number of the protestors wearing orange bibs, again with the Just Stop Oil logo. He gave evidence that one site worker had told the protestors that they had a medical appointment around 2.30 and had asked Michelle Charlesworth whether they would move to facilitate the vehicle but that she had refused to allow the worked to leave in their vehicle. PC Dunn later arrested Michelle Charlesworth. Ms Charlesworth cross-examined PC Dunn. He stated that he had been an officer for some three-and-a-half years and had policed climate protests on one previous occasion. He accepted that the protest was entirely passive. He explained that he had not received any information or training about climate emergency in his capacity as a police officer.
22. In the course of their oral evidence, each of the police officer witnesses confirmed the location of the protest on the private access road by reference to the injunction plan. The location identified by each fell within the red boundary line referred to in the injunction.

23. The court heard oral evidence from each of the six defendants. Self-evidently, some of the defendants gave evidence before their co-defendants. The defendants indicated that, in addition to relying on their own evidence, in general each also adopts the evidence of their co-defendants.
24. Tez Burns was the first defendant to give evidence. She was frank with the court and accepted that she had broken the injunction when obstructing the oil terminal on 14 September. She gave a very eloquent explanation as why she had chosen to join the action on that day borne, in particular, out of her concern over government plans to drill more holes for the extraction of fossil fuels. She spoke at some length to a letter published by OnePointFive Degrees and signed by some 150 solicitors and barristers urging that climate conscious actions be taken by lawyers. She stated that she was not a criminal but was driven by what she thought was right. In cross-examination, Tez Burns was taken through the various allegations of breach and she accepted, very frankly, that she was involved in Just Stop Oil protests against the production and use of fossil fuels inside the red boundary line. She admitted she was obstructing an entrance to the terminal and that the volume of individuals participating in the protest meant that together they blocked road. She also accepted that the police had read the injunction to them and given them the chance to move but she chose not to.
25. Michelle Charlesworth adopted the evidence of Tez Burns and later asked to adopt the evidence of co-defendants who gave evidence after her. Ms Charlesworth made admissions as to her involvement in the protest on 14 September against the production and use of fossil fuels. She did not accept that she had encouraged the others and stated that all of the protestors involved on that day were there of their own volition and did not require the encouragement of any co-member of Just Stop Oil. Ms Charlesworth accepted that she was now before the court for a third breach of the injunction and also had an earlier finding of contempt in the face of the court for gluing herself to the dock. She admitted that she had told the site worker that the protestors would not move to allow him to leave in his vehicle for his medical appointment. She however explained that it had been made clear to him that he could leave on foot. She stated that the protestors would have been happy to pay for a taxi or that his employer could have found a way to assist. She stated that, whilst their policy was not to move, they would have done if there had been an ambulance with lights flashing or similar emergency situation.
26. Mary Adams also adopted the evidence of Tez Burns and again made admissions as to her activity on that day putting her in breach of the injunction. She told the court that she takes the view that the injunction prohibits her rights under Articles 10 and 11 whilst protecting the rights of the fossil fuels industry. Ms Adams gave a very eloquent explanation as to her rationale for acting in the way that she did and detailed a number of examples of recent climate emergencies. She urged the court not find the defendants in contempt of court, citing circumstances in which history has shown that laws can change according to changing societal values. In cross-examination she, in common with earlier defendants, accepted that she had been within the red boundary line, obstructing the entrance to the terminal, as part of a protest against the production and use of fossil fuels.
27. Sheila Shatford adopted the evidence of Tez Burns and Mary Adams. She told the court that she had retired two years ago after working for 50 years as a nurse and had not taken

the decision to protest lightly. She explained that her actions were motivated by climate crisis which was already affecting the world. Ms Shatford explained that she felt she had a moral duty to speak up. Whilst she accepted that their actions would have caused temporary but frustrating disruption and costs to public services, she considered those insignificant compared to the mass extinction. In cross-examination she too accepted that she had been involved in the protest against the production and use of fossil fuels within the red boundary line and that she was obstructing the entrance to the terminal.

28. Charlotte Kirin also adopted the evidence given by her co-defendants. She too acknowledged that she had been part of the protest at Kingsbury on 14 September explaining that she had done so to prevent greater harm. In cross-examination, she too admitted breach of the injunction.
29. The court finally heard evidence from El Litten. El Litten adopted the previous defendants' evidence and gave an eloquent explanation as to the reasons for acting borne of concern as to the crises that were hitting the planet on a global scale. El considered that the courts and judiciary should be holding the government to account. El Litten indicated they were not asking for leniency personally. In cross-examination, El Litten, as with the other defendants, admitted taking part in the protest within the boundary line, obstructing the entrance to the terminal, whilst being aware of the injunction.

Findings of Fact

30. The defendants do not challenge the claimant's factual case. Each has admitted that they were involved in the protest on 14 September 2022 against the production and use of fossil fuels and that, by doing so, were within the red boundary line and blocked the entrance to the oil terminal. Taken together with the evidence from the police officers, including the body worn camera footage, I am satisfied that the claimant has proved its factual case namely that each of the defendants was protesting within the red boundary line marked on the map at Schedule 1 to the injunction, that that protest was in relation to the production and/or use of fossil fuels and it blocked or obstructed the entrance to the oil terminal. By acting in such a large group, each individual protestor assisted others to achieve the aim of blocking the whole road leading to the entrance to the terminal.

Analysis

31. It is trite law that an injunction must be served in order for it to be enforced by way of committal for contempt unless service has been dispensed with. This is not a case in which service has been dispensed with. Having heard from and read the evidence of Mr Tobin, I am satisfied that the injunction was served by the alternative methods specified by Sweeting J. In the latter part of August 2022 and early September 2022 multiple signs highlighting the injunction were placed around the perimeter of the site, at the entrance to the site and at junctions of roads leading to the entrance to the oil terminal. Furthermore, I accept the certificates of service that evidence the publication of the injunction by digital means on 10 May 2022 and again by providing links on 23 August. Moreover, each of the defendants admit that they were already aware that the injunction was in force when undertaking the protest.

32. I turn to the particulars of alleged breach. The first allegation is that the defendants breached paragraph 1(a) of the injunction by participating in a relevant protest within the boundary of the area demarcated on Schedule 1. It will be apparent from the findings of fact I have made that each of the defendant's conduct on 14 September puts them in breach of paragraph 1(a). The same is also true as to the allegation that those actions amount to a breach of paragraph 1(b)(iii) in that the protest obstructed an entrance to the terminal. I am further satisfied that the defendants' actions, acting in unison to block the road, amounts to a breach of paragraph 1(b)(xi). It required more than one individual to achieve the blocking of the entire width of access road and each assisted the other in that aim.
33. I turn to the defendants' submission that the court should not use this as an opportunity to make findings of contempt, notwithstanding that the claimant has proved the individual elements of breach. Each of the defendants have addressed the court extensively as to their views on the climate emergency. It is generally acknowledged in society that there are very legitimate environmental concerns. It is also recognised that individuals are entitled to qualified (rather than absolute) rights to freedom of speech, to freedom of assembly and to protest, but that those rights have to be exercised within the rule of law. The injunction granted by Sweeting J was an order made by a court of competent jurisdiction. When Sweeting J imposed the order, due consideration will have been given to the defendants' Article 10 and Article 11 rights. In other words, the decision to grant the injunction balanced the interests of those seeking to protest with the rights of others affected by their conduct. As per the decision of the Divisional Court in *National Highways Limited v Buse* case, although Articles 10 and 11 are engaged in this contempt application, they are not relevant to the question of determination of breach because those consideration were already factored in when the interim injunction was made. I therefore reject the defendants' submission that their assertion that the injunction infringes their Article 10 and 11 rights amounts to a defence to the contempt proceedings.
34. The injunction remains in force but is an interim order only. At some point in the future there will be a final hearing. The defendants will have the opportunity, should they so wish, to attend the final hearing and make submissions as to their concerns as to Article 10 or Article 11 issues and the appropriateness of a final injunction. The claimant has indicated that each of these defendants is to be added to the substantive proceedings as named defendants.
35. In those circumstances, I conclude that the claimant has established to the necessary criminal standard of proof that the applications for committal for contempt against each of the defendants have been proved. Each defendant is found to be in breach of paragraphs 1(a), 1(b)(iii) and 1(b)(xi) of the order.
36. A transcript of this judgment on liability will need to be obtained at public expense on an expedited basis and published on the judiciary website. I will hear from the claimant and each of the defendants before determining the appropriate penalties for contempt.

[THE COURT HEARD SUBMISSIONS FROM THE PARTIES]

JUDGMENT ON SENTENCE

37. El Litten, Charlotte Kirin, Michelle Charlesworth, Tez Burns, Sheila Shatford and Mary Adams, it falls for the court to determine the appropriate sanction in light of the finding that each of you is in contempt of court arising out of your involvement in the protest on 14 September 2022.
38. I have already set out the background to the case, your actions and my findings in my earlier judgment on liability.
39. The claimant has prepared a sentencing note to assist the court with the approach to take in relation to the imposition of sanction for contempt. I largely agree with the approach advocated for by the claimant. These contempts of court are civil not criminal matters. The finding of contempt will not appear on any criminal record. There is, however, a penal element to the imposition of a sanction. When determining the appropriate penalty for a contempt of court, I bear in mind the guidance given by the Court of Appeal in *Willoughby v Solihull MBC* [2013] EWCA Civ 699. There are three objectives to consider when imposing a penalty. Pitchford LJ at para 20 held:
- "the first is punishment for breach of an order of the court; the second is to secure future compliance with the court's order if possible; the third is rehabilitation, which is a natural companion to the second objective."
40. The Sentencing Council produce guidelines for use in criminal cases. They do not produce guidelines for civil cases. However, the Court of Appeal, in a number of cases, including *Amicus Horizon v Thorley* [2012] EWCA Civ 817 has endorsed the use of the Sentencing Council guidelines in the civil courts by analogy. The appropriate guideline is that for breach of a criminal behaviour order. It is not however a complete analogy. Breach of a criminal behaviour order in the criminal courts attracts a maximum sentence of 5 years' imprisonment whereas the maximum penalty for a civil contempt of court is one of two years' imprisonment on any one occasion. The criminal courts also have a variety of community orders available to it which this court does not. I am also mindful that the injunction is not an antisocial behaviour injunction of the kind that is made under the Antisocial Behaviour Crime and Policing Act. The analogy is not therefore a complete one and the suggested criminal sentences have to be scaled down to some extent.
41. In their report of July 2020, the Civil Justice Council looked at appropriate penalties for contempt of court arising from injunctions made under the Anti-social Behaviour, Crime and Policing Act 2014. Those draft guidelines, similar in style to the Sentencing Council guidelines, were adapted to reflect the lower range of penalties in the civil courts. Those guidelines have never been brought into force. They were also prepared in respect of breaches of anti-social behaviour injunctions rather than in respect of breaches of protestor injunctions. I therefore adopt the criminal guideline as the best analogy.
42. The claimant referred in its opening to the Court of Appeal decision in *Cuadrilla Bowland Ltd and Others v Persons Unknown* [2020] EWCA Civ 9. I referred in my liability judgment to *National Highways Limited v Buse* [2021] EWHC 3404 (QB). In

both of those cases the court looked at the approach to be adopted when dealing with sanctions for contempt of court in protestor cases.

43. None of the defendants have legal representation today. Had you had been represented, I have no doubt that your legal representatives would have urged the court to adopt the guidance in *Cuadrilla Bowland* and have reminded the court that it should usually be reluctant to make an order for immediate imprisonment when a protestor acting for conscientious reasons first comes before the court. In *Cuadrilla Bowland*, Leggatt LJ considered the approach to sentencing protestors:

“[95] Where, as in the present case, individuals not only resort to compulsion to hinder or try to stop lawful activities of others of which they disapprove, but do so in deliberate defiance of a court order, they have no reason to expect that their conscientious motives will insulate them from the sanction of imprisonment.

[96] On the other hand, courts are frequently reluctant to make orders for the immediate imprisonment of protestors who engage in deliberately disruptive but non-violent forms of direct action protest for conscientious reasons...”

44. I accept that all of six of you acted for conscientious reasons and that this was a wholly peaceful protest. At paragraph 98 of *Cuadrilla Bowland* Leggatt LJ discussed the reasons for showing greater clemency in response to acts of civil disobedience and at concluded at paragraph 99:

"These considerations explain why, in a case where an act of civil disobedience constitutes a criminal offence or contempt of a court order which is so serious that it crosses the custody threshold, it will nonetheless very often be appropriate to suspend the operation of the sanction on condition there is no further breach during a specified period of time. Of course, if the defendant does not comply with that condition, he or she must expect that the order for imprisonment will be implemented."

45. I turn to the Definitive Guideline for breach of a criminal behaviour order. The claimant submits that all of these defendants, bar Michelle Charlesworth, fall into culpability category B, being a deliberate breach. I agree with that classification. The breach by each of the said five defendants was deliberate.
46. Ms Charlesworth, however, is in a different position. Ms Charlesworth, this now your third contempt arising from breach of the injunction with earlier contempt of court occurring on 27 April 2022 and 4 May 2022. There is an additional contempt within these proceedings when you glued yourself to the dock of the court on 5 May 2022. For those earlier three matters, you received a sentence of 33 days' immediate imprisonment which took account of the equivalent of 30 days' spent on remand in custody. Four matters of contempt within a period of five months moves your case into culpability category A as your actions are persistent.

47. When determining the category of harm, the guideline requires consideration of the “harm that has been caused or was at risk of being caused.” The claimant submits that the harm falls into category two, falling between the highest and lowest categories. In determining the level of harm, the court has to look at the facts and circumstances of this particular protest. Your actions prevented the normal operation of the oil terminal for a minimum period of about 4.5 hours from 11.30am until the first arrests started at 3.50pm. The actual period of disruption and inconvenience was longer than that because of the period of time it took to affect the arrest of 51 protesters. During that period, whilst you stopped oil tankers accessing and egressing the terminal and for part of the period you stopped workers entering and exiting in their own vehicles. It is accepted that you continued to allow individuals to access and egress on foot. The court has not been provided with any evidence from the operators of the terminal as to the impact on their business. Therefore, other than the inconvenience that is self-evident from the blocking of the passage of oil tankers, I do not take into account any specific business impact. There is however evidence that one worker was stopped from using their vehicle to exit the site using the access road you were blocking to attend a medical appointment.
48. The harm also extends to the consequences of the closure of part of the public highway whilst the protests and arrests were ongoing. That will have impacted on ordinary members of the public, including in particular those living in the vicinity of the terminal, who were trying to go about their daily lives.
49. Your actions also caused very significant harm to the police resources in Warwickshire and beyond at a time when resources were already very stretched as a result of the unprecedented impact of the late Queen's death and the consequent period of national mourning necessitating the redeployment of Warwickshire Police officers to London. The scale of your protest meant that multiple officers from across Warwickshire had to be diverted away from their normal policing duties to attend, including firearms, traffic and dog unit specialist officers. They attended not because there was any suggestion your protest was other than peaceful but due to the sheer number of protestors that needed to be arrested and processed. The diversion of police resources clearly created a risk of very significant harm to other parts of Warwickshire that were left under resourced. Warwickshire Police had call for mutual aid from West Midlands Police and West Mercia Police, further diverting police resources from those areas. There is also evidence before the court that officers had to work long past their shifts ended to process those arrested. Inevitably that will have impacted on their welfare and resulted in the police force incurring overtime costs.
50. In those circumstances, the impact on policing resources arising from the timing and scale of this protest means the case falls above category 2 albeit I accept it does not fall squarely within category 1, that is to say very serious harm or distress. I therefore proceed on the basis that harm is to be assessed falling between category 1 and category 2.
51. If this matter were in the criminal courts, the guideline would suggest the following sentences for all defendants save Ms Charlesworth,. A category 1 harm, culpability B matter would have a starting point sentence of 1 years’ imprisonment with a range of high level community order to two years’ custody. A category 2 harm, culpability B

case would have a starting point of 12 weeks' custody with a range from a medium level community order to 1 years' custody.

52. Ms Charlesworth is in a different position. A category 1 harm, culpability A offence in the criminal courts would have a starting point sentence of 2 years' custody, with a range of 1 to 4 years' custody. A category 2 harm, culpability A matter, would have a starting point of 1 year's custody with a range of a high level community order to 2 years' custody.
53. The penalties for contempt of court have to be reduced to reflect the lower maximum term of imprisonment in the civil court. The court has to take into account any aggravating or mitigating circumstances for each defendant. That requires individual consideration of each defendant's case.
54. I deal firstly with Ms Charlesworth's position. The three previous contempt of court matters are not taken into account as an aggravating factor because they have already been taken into account when determining the category of culpability. Ms Charlesworth does, however, have relevant previous convictions. In April 2022 she received an eight-week term of imprisonment, suspended for a period of 12 months, plus unpaid work in respect of a conviction for public nuisance. The suspended sentence element was thus still operational at the date of the contempt on 14 September 2022. She also has 2 further convictions for public nuisance as to which similar concurrent sentences were passed. In addition, she has a conviction for obstructing the highway as to which no separate penalty was passed. All the offences relate to protest activity occurring in the Autumn of 2021. The criminal convictions are an aggravating factor dictating some upward movement from the starting point.
55. Ms Charlesworth's personal circumstances are, however, very sympathetic. Prior to March 2022 she had a lengthy, highly respectable career in which she made valuable contributions to society. She had worked in a variety of human resource roles, in the domestic violence sector, in homelessness hostels, and in managerial positions in the various third sector organisations. She has co-founded a climate change emergency charity and is still heavily involved in that. I take her personal mitigation into account.
56. Tez Burns has two previous convictions from June 2022 for obstructing the highway for which she was fined. The offences themselves date to 2021. Ms Burns was not the subject of any suspended sentence or period of conditional discharge at the date of the contempt. In common with the approach I have taken in other cases of contempt arising out of this protest, I do not propose to take the two offences, which resulted in fines only, into account as an aggravating factor. Ms Burns also has good personal mitigation. Whilst she is not in employment at the moment, she is heavily involved in voluntary work with a charity and has taken significant steps to overcome previous battles with alcohol addiction to achieve degree level academic qualifications. As with all of these defendants, she was motivated on grounds of social conscience.
57. Mary Adams has two previous convictions in 2022 for obstructing a highway, again dating back to protest activity in 2021. She was fined for both matters. In common with the approach adopted in respect of Tez Burns and other co-defendants, I do not propose

to treat the two convictions as an aggravating matter. Ms Adams was in longstanding employment before she retired in 2014 and is now involved in a small charity supporting small environmental projects.

58. Sheila Shatford is of positive good character with has no previous convictions or cautions. She is retired, having worked as a nurse for approximately 50 years. Whilst she is in receipt of a private and state pension, she is of relatively modest income having a mortgage which will not be repaid until she is aged 75.
59. Charlotte Kirin is also of positive good character with no previous convictions or cautions. She is a qualified social worker and had worked in that role for some 20 years before leaving her job only recently as a result of a protest activity.
60. El Litten has a single previous conviction from May 2022 for obstructing the highway in the Autumn of 2021. The conviction resulted in a financial penalty. As with other defendants in a like position, I do not propose to take the single criminal conviction resulting in a fine into account as an aggravating factor.
61. El Litten has been very frank with the court and disclosed that she has been before the civil courts for breaching other civil injunctions, including the National Highways injunction. Whilst El Litten is to be commended for her frankness, I conclude it would not be appropriate to take her previous admitted contempt of court arising in other civil matters into account as an aggravating factor. Unlike in the case of criminal convictions and cautions, this court is not assisted by any national database of individual's previous findings of contempt of court. I do not therefore have details as to the previous findings of contempt, dates thereof or what sanctions were imposed. The details provided by Ms Litten are vague and unparticularised. In addition, I know nothing as to whether any of the other 50 defendants appearing in respect of the protest on 14 September also have previous findings of contempt. There is a risk of disparity if I approach El Litten's case in a manner different to others that may too have findings of contempt in other claims. Whilst the civil courts would be very much assisted by a national database of previous civil breaches, on this occasion I am not persuaded it is appropriate to take El Litten's past admitted contempt into account as an aggravating factor.
62. El Litten describes being employed one day per week and undertaking some freelance work for the remainder of time, producing a modest but not substantial income.
63. I turn to the cases of Ms Burns, Ms Adams, Ms Shatford, Ms Kirin and Ms Litten. In my judgment, the contempt of court arising out of each of your involvement in the protest on 14 September 2022 is so serious that only a custodial sentence is appropriate. The starting point for each of you, taking into account each of your personal circumstances, is one of 56 days' imprisonment. I will return to the issue of whether that sentence can be suspended in due course.
64. Unlike the co-defendants that appeared before the court last week and who made admissions, you are not entitled to any credit for an admission as your cases each required a trial.

65. In fixing the term of imprisonment in the civil courts, the court has to take into account any time that has been spent in custody on remand and deduct it from the term. You have each spent 13 days in custody. That equates to a sentence of 26 days. Therefore, the term of 56 days needs to be reduced by 26 days giving a term of 30 days' imprisonment.
66. I bear in mind the guidance in *Cuadrilla Bowland* and in *National Highways v Buse*. These are your first breaches of this injunction and your actions arose from civil disobedience. I am persuaded that it is appropriate in each of your cases to suspend the term of imprisonment on condition of compliance for a period of two years from today with the terms of any interim or final injunction order made in the claim in relation to protest activity at Kingsbury Oil Terminal. For the avoidance of doubt, the current order in force is the interim order of Mr Justice Sweeting dated 6 May 2022 but if that order was subsequently varied, it would be the form of any varied order with which you must comply. I make it clear, if you fail to comply with the terms of the suspension, you must expect that the order for imprisonment would be implemented and you will be dealt with separately in relation to any future contempt.
67. I turn to the case of Michelle Charlesworth. In my judgment the contempt of court, being the fourth contempt in these proceedings, is so serious that only a custodial sentence is appropriate. Taking into account the higher categorisation of culpability and your aggravating and mitigating circumstances I have already referred to, a starting point sentence of 154 days' imprisonment is appropriate. As with the other defendants, I deduct 26 days to reflect the 13 days you have already spent in custody on remand. That reduces the term to 128 days' imprisonment.
68. I have considered the guidance in *Cuadrilla v Bowland* and *National Highways v Buse*. I have also taken into account the definitive guideline on the imposition of community and custodial sentences. Ms Charlesworth, you have a very poor history of compliance with this order having been before the court now on three occasions for contempt within the last five months and once in relation to contempt in the face of the court in the context of these proceedings. Against that background, I am not persuaded it is appropriate for the court to suspend and thus the 128 days will be an immediate term of imprisonment.
69. Although the defendants feel very strongly about the injunction, it does not prevent the conducting of protests, even in the locality of the terminal. There is an area which falls outside the red boundary line immediately adjacent to the entrance to the terminal where the protest on 14 September occurred. Protests can take place outside the red boundary line so long as they do not otherwise contravene paragraph 1(b) of the order. However, as has been said repeatedly by more senior courts than this, in a democratic society it is the duty of responsible citizens to obey the law and rights of others, even where those laws are contrary to their moral convictions.
70. The claimant has made an application for each defendant to pay a contribution to its costs. It quantifies that contribution as £320.77 each in respect of the hearings up to and including the directions hearings last week, and a further £1,095 each in relation to the costs of the trial.

71. The general rule in civil litigation is that the successful party is entitled to its costs from the unsuccessful party unless the court orders otherwise. The claimant has proved its case and is the successful party. In principle, the defendants will each pay a contribution to the claimant's costs.
72. At hearings last week, I deemed the sum of £320.77 a proportionate sum for the work up to and including the second hearing. As to the costs of the trial, the claimant's figure includes the costs for half a day's attendance yesterday. Yesterday was listed as the first day of trial but it could not proceed due to the prison failing to produce Charlotte Kirin. Neither the claimant nor defendants were at fault for the non-production of Ms Kirin. The defendants' failure to make admissions required a trial of these matters and one which was listed for two days. The vicissitudes of litigation are such that it is appropriate for those costs to fall at the door of the defendants who required the trial to be listed.
73. I am persuaded that the overall sums sought by the claimant I respect of the trial are proportionate and indeed relatively modest for litigation of this nature. I therefore summarily assess each defendant's contribution to the trial costs in the sum of £1,095. Adding the costs from last week gives rise to a total of £1,415.77 per defendant. As to payment of that sum, each defendant's financial circumstances have to be taken into account.
74. Tez Burns is in receipt of Universal Credit and of extremely limited means. Ms Burns shall pay the costs by instalments of £10 a month, the first payment to be made by 27 October 2022 and thereafter by the 27th of each month until the balance is discharged.
75. Michelle Charlesworth is of limited means having left her employment in March. However, she lives with her husband in a property subject to a mortgage. In Ms Charlesworth's case the instalments will be £50 a month. In light of the immediate custodial sentence, the first payment of £50 will not be due until 30 November 2022 and thereafter by the 30th of each month
76. Mary Adams is retired and derives her income from rental income and certain investments. She is in a better financial position than the other defendants and shall pay the £1,415.77 as a lump sum by 31 October 2022.
77. Sheila Shatford is a retired nurse and in receipt of a combination of private and state pension income. She does, however, still have a mortgage liability which will not be redeemed until she is aged 75. Ms Shatford will pay by instalments of £50 per month, again with the first payment by 27 October 2022 and thereafter by 27th of each month.
78. Charlotte Kirin is currently not in employment and is hoping that she will be able to obtain some work in the near future. She believes any income will be much reduced from that she received when a full-time social worker. She has a mortgage liability and lives alone with no savings. Ms Kirin will pay by instalments of £25 per month, the first payment by 27 October 2022 and thereafter by the 27th of each month.

79. El Litten has income of approximately £1,000 a month from a combination of employment for one day a week and some freelance work. She too is of modest means. El Litten will pay by instalments of £25 per month, the first payment by 27 October 2022 and thereafter by the 27th of each month.
80. Each defendant has a right to appeal the orders for committal. Any appeal must be made to the Court of Appeal Civil Division within 21 days of today.
81. As with the judgment on liability, a transcript of this judgment shall also be obtained at public expense and published in due course on the Judiciary website.
82. I thank each of the defendants for the dignified way in which they have conducted themselves throughout the trial. I was aware that each wanted to have their voice heard and their conduct ensured that the case proceeded without disruption such that all could participate.

Epiq Europe Ltd hereby certify that the above is an accurate and complete record of the proceedings or part thereof.

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How Greenpeace activists occupied a Shell platform heading for a major oil and gas field

Activists from climate-hit countries exposed Shell's reckless plans to drill for more oil and gas, as the company announced record profits. The protest was Greenpeace's longest ever occupation of a moving oil platform.

- UPDATED 12th February 2023
- Climate change
- Blog

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How it happened

- Greenpeace International activists boarded a ship chartered by Shell, carrying crucial equipment to an oil and gas field in the North Sea.
- Together they occupied the equipment throughout the nearly 4,000km journey, highlighting Shell's reckless plans to keep drilling for more fossil fuels.
- As Shell announced record annual profits of £32bn, the activists told the other side of the story: Shell are knowingly making climate change worse, and this is destroying lives and livelihoods all over the world.
- As the ship arrived in the Norwegian port of Haugesund, the activists ended their 13 day occupation with a simple message to Shell: **Enough is enough. Stop drilling and start paying for the climate destruction you've caused.**





Latest updates

- **NEW: The occupation has ended.** On Sunday 12 February, the activists left the ship as it arrived at Haugesund in Norway. None of the

activists were arrested by Norwegian authorities. In a final stand at 10.30am, they climbed the platform's 125m flare boom, and waved a banner saying 'Stop drilling. Start Paying.'

- **NEW: “Just the beginning”**: Greenpeace activist Yeb Saño said “Shell might think this is the end of our protest, but my message to chief executive Wael Sawan is that this is just the beginning. We are seeing people connecting the dots between fossil fuel mega profits and the bill for climate loss and damage. It is right that the likes of Shell must pay for devastation that they are directly causing.”
- **Greenpeace has been hit with a legal claim** demanding it pays Shell more than £100,000 for alleged damage caused by activists on board its oil platform. Lawyers are not able to provide any detail on what damage is alleged. Based on Shell's 2022 profits, it would take them two minutes to make the £100,000 being claimed from Greenpeace.

Why Greenpeace is taking action against Shell

- By drilling for more oil and gas, Shell are knowingly making climate change worse.
- This is destroying people's lives around the world – often the people who did least to cause the problem.
- So while Shell makes billions in profits, they're also causing billions of dollars of climate damage.
- That's simply not fair, so Greenpeace is taking action to put it right.
- We're calling on Shell to stop drilling and start paying for the climate damage they've caused.
- The world can't stop using oil and gas overnight. But drilling for more fossil fuels isn't the answer.
- There's already more oil and gas available than we can safely burn, and experts say more drilling won't even help reduce energy prices.

What you can do

Sign the petition

You can put pressure on the fossil fuel industry by joining the call for climate justice. Petitions alone can't save the world, but adding your name is a powerful way to show how many people are demanding change.

Join the call for climate justice

Add your name to demand that fossil fuel companies stop their climate-wrecking activities, including their involvement in new fossil fuel projects; admit and apologise for their crimes; repair and pay for the damage they have caused



Sign the petition

Tell Shell: Stop Drilling. Start Paying

Shell doesn't have much of a social media presence, but they are big on LinkedIn and their new CEO Wael Swan has just posted a new glossy video. Can you join thousands of others by commenting on Shell's LinkedIn page to demand they stop drilling and start paying?



Send a message to Shell

Tell people what's happening

Think about someone in your life who'd want to know about this, and link them here, or to Greenpeace's posts on social media.

Greenpeace UK 
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 **BREAKING:** After Shell reported £32.2 BILLION in profits, people from Africa, the Middle East and Europe joined the protest in the Channel. 

It's time for Shell to Stop Drilling and Start Paying for the climate damage they've caused.

[#MakeShellPay](#)

Watch on Twitter

2:47 PM · Feb 8, 2023



 295  Reply  Share

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Some important facts

There's a basic injustice at the heart of the climate issue: the people suffering the most are often the ones who did least to cause the problem. Countries like Pakistan, Somalia and the Philippines were rocked by climate disasters in 2022, but people there create much less carbon pollution than those in richer countries.

Climate chaos: Climate change, driven by Shell and other fossil fuel companies, is causing huge damage and disruption worldwide. Some estimates put the cost to poor countries at half a trillion dollars and 293,000 lives.

Shell's plan: the ship is carrying a piece of equipment called a floating production storage and offloading unit that they'll use to 'redevelop' the 'Penguins' oil and gas field in the North Sea. Essentially, they're planning to squeeze every last barrel out of this field. In the middle of a climate crisis.

How much oil and gas? Shell's equipment would enable them to pump out the equivalent of up to 45,000 barrels of oil a day from the Penguins field. Burning all the oil and gas they get from this project would create 45m tonnes of CO2. That's more than the entire annual emissions of Norway.

Drilling for more oil and gas is only good for Shell's profits: Nobody's saying we can stop all oil and gas use immediately. But that's not a reason to drill new wells. There's already more than enough oil and gas available to keep things going while we switch to clean energy.

Experts say that adding drilling for more oil and gas won't help bring down energy costs. So this isn't about supplying people's needs – it's about Shell keeping the world hooked on its products, and slowing the shift to better energy sources.

Covering the cost: It's estimated the fossil fuel industry made enough profit from 2000-2019 to cover the cost of climate losses in 55 climate-vulnerable countries nearly 60 times over.

This is personal: Many of the people involved in this action have been personally affected by climate disaster. You can read the crew's stories [here](#).

Learn more

“The typhoon ripped through my home town”: activists on why they’re taking action against Shell

For many of the activists and crew involved, this is personal. Here, they share what Shell’s climate crimes have taken from them and their communities.

Will increasing oil and gas production reduce energy bills?

As energy bills go up and up, there have been suggestions that increasing the flow of oil and gas from the North Sea will help to combat spiralling bills. But the way energy is traded across the world, as well as decisions made by this and previous governments, means that churning out more fossil fuels is not the answer.

Climate change: the basics

Confused about climate change? Our guide explains everything you need to know, including what causes climate change, what the impacts are, and how we can tackle it.

Loss and damage: who foots the bill for climate destruction?

The 'loss and damage' debate is about the harm caused by climate change, and how it should be paid for. In recent years, it has risen up the agenda, along with calls for polluters to pay up.

The just transition: a fairer approach to tackling climate change

How do we tackle the climate crisis without harming workers in polluting industries? The answer is a 'just transition', that transforms the economy in a way that's fair to everyone.

The fight for environmental justice, explained

Often the worst impacts fall on those who are already most exploited by people in power. The fight for environmental justice is about addressing this unfairness.

Share



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How Greenpeace activists occupied a Shell platform heading for a major oil and gas field



Greenpeace International

3 February 2023 • 5 min read • 1 Comments

Activists from climate-hit countries exposed Shell's reckless plans to drill for more oil and gas, as the company announced record profits. The protest was [Greenpeace's longest ever occupation of a moving oil platform](#).

How it happened

- Greenpeace International activists [boarded a ship](#) carrying crucial equipment for Shell to produce more oil and gas in the North Sea.
- Together they occupied the equipment throughout the nearly 4,000km journey, highlighting Shell's reckless plans to keep drilling for more fossil fuels.
- As Shell announced [record annual profits of £32bn](#), the activists told the other side of the story: Shell are knowingly making climate change worse, and this is [destroying lives and livelihoods](#) all over the world.
 -
- As the ship arrived in the Norwegian port of Haugesund, the activists ended their 13 day occupation with a simple message to Shell: **Enough is enough. Stop drilling and start paying for the climate destruction you've caused.**



Greenpeace climate justice activists approaching Shell platform en route to major oilfield with message: 'STOP DRILLING. START PAYING.' © Chris J Ratcliffe / Greenpeace

Latest updates

- **NEW: The occupation has ended.** On Sunday 12 February, the activists left the ship as it arrived at Haugesund in Norway. [None of the activists were arrested](#) by Norwegian authorities. In a final stand at 10.30am, they climbed the platform's 125m flare boom, and waved a banner saying 'Stop drilling. Start Paying.'
- **NEW: "Just the beginning"**: Greenpeace activist Yeb Saño said "Shell might think this is the end of our protest, but my message to chief executive Wael Sawan is that this is just the beginning. We are seeing people connecting the dots between fossil fuel mega profits and the bill for climate loss and damage. It is right that the likes of Shell must pay for devastation that they are directly causing."
- **Greenpeace has been [hit with a legal claim](#)** demanding it pays Shell more than \$120,000 for alleged damage caused by activists on board its oil platform. Lawyers are not able to provide any detail on what damage is alleged. Based on Shell's 2022 profits, it would take them two minutes to make the \$120,000 being claimed from Greenpeace, the equivalent of 0.0003% of Shell's profits last year.
- **More people join the protest:** Shell tried to silence the peaceful occupation of its oil and gas platform with a court order threatening up to two years' jail time and fines. But instead, Greenpeace International [escalated the protest by adding two more climbers to the platform](#) – using other boats unaffected by the order. [People from Africa, the Middle East and Europe joined the protest](#) in the English Channel.
 -
- **Shell's record profits:** On 2 February, Shell announced record annual profits of \$39.9bn. That's over double [what Pakistan needs](#) to recover from last year's devastating floods. Activists [set up a mock petrol station price board](#) outside the company's London HQ, highlighting their profits and their failure to pay for climate damage.

GREENPEACE

cargo: an essential bit of oil and gas production equipment bound for the North Sea. Greenpeace's ship the Arctic Sunrise chased at full speed, to catch up and stay in communication with the activists.

Why Greenpeace is taking action against Shell

- By drilling for more oil and gas, Shell are knowingly making climate change worse.
- This is [destroying people's lives](#) around the world – often the people who did least to cause the problem.
- So while Shell makes billions in profits, they're also causing billions of dollars of climate damage.
- That's simply not fair, so Greenpeace is taking action to put it right.
- We're calling on Shell to stop drilling and start paying for the climate damage they've caused.
- The world can't stop using oil and gas overnight. But drilling for more fossil fuels isn't the answer.
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End Fossil Crimes

Take action

Tell Shell: Stop Drilling. Start Paying

Shell doesn't have much of a social media presence but can you send a message to Shell on Twitter?

F/1/358

EXHIBIT FL1-122

Tell people what's happening

Think about someone in your life who'd want to know about this, and link them here, or to [Greenpeace's posts on social media](#) .

Greenpeace International  

@Greenpeace · [Follow](#)

Our four brave activists occupying the 34,000 tonne oil platform on its way to the North Sea have a message for Shell's CEO 🙌

They are responding to its announcement of record annual profits [#MakeShellPay](#)

Watch on Twitter

11:13 AM · Feb 2, 2023 

 2.2K  Reply  Share this Tweet

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Some important facts

There's a basic injustice at the heart of the climate issue: the people suffering the most are often the ones who did least to cause the problem. Countries like Pakistan, Somalia and the Philippines were [rocked by climate disasters in 2022](#), but people there create much less carbon pollution than those in richer countries.



at [half a trillion dollars and 293,000 lives](#) .

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This is personal: Many of the people involved in this action have been personally affected by climate disaster. [You can read the crew's stories here.](#)

[#Climate](#)

[#Arctic Sunrise](#)

[#Oil](#)



Greenpeace

Greenpeace protesters board Shell platform bound for Shetland

Four activists board 52,000-tonne vessel north of Canary Islands and demand company 'Stop drilling - start paying'

Tom Wall

Tue 31 Jan 2023 15.01 GMT

Greenpeace protesters have boarded a Shell floating oil platform which is being transported over 12,000 nautical miles to the Shetland Islands with signs demanding that the fossil fuel giant “Stop drilling - start paying”.

The four activists from the UK, Turkey, the US and Argentina climbed on to the 52,000-tonne heavy-lift vessel just north of the Canary Islands on Tuesday morning and displayed a banner from the platform in what it said was a peaceful protest against the climate devastation around the world “caused by [Shell](#) and the wider fossil fuel industry, without paying a penny towards loss and damage”.

The protesters reached the heavy-lift vessel in three boats launched from Greenpeace’s Arctic Sunrise ship and used ropes to climb on to the deck. They then occupied the platform, which is being carried on the back of the vessel.

One of the occupiers, Usnea Granger, said they had left the main Greenpeace boat early in the morning and used ropes to scale the vessel and platform. “There was a couple of meters of swell. It was a bit of an adventure to get on board,” she said, over gusts of Atlantic wind. “But we are well and safe. We have all the equipment we need to keep ourselves safe.”

Granger said the protest was personal for her. “I’m originally from the United States and we’ve had so many climate catastrophes. It’s hard to keep track,” she said. “I’ve had friends who have been forced to flee their homes with no warning from forest fires. I’ve had friends who need to leave because of hurricanes and never go back. I know farmers who had to leave the farms where they raised their kids because of drought.”

Yeb Saño, Greenpeace executive director and former lead climate negotiator for the Philippines, failed to get on board the platform. He said: “We’re taking action today because when Shell extracts fossil fuels it causes a ripple of death, destruction and displacement around the world, having the worst impact on people who are least to blame for the climate crisis.”

The platform will enable Shell, which is **expected** to unveil adjusted annual profits of around \$83bn (£67bn) later this week, to further **exploit** the Penguins oil and gas field, which sits 150 miles (240km) off the Shetland Islands. Greenpeace says it will be used to unlock eight new wells in the field.

The platform could also be **involved** in producing new oil and gas from a nearby untapped reservoir, which is being drilled by Shell. The company, which is headquartered in London, has **described** the redevelopment of the Penguins field as an “attractive opportunity”, which it estimates will produce 45,000 barrels of oil or equivalent in gas every day at its peak.

Shell said the protest was a safety concern. “These actions are causing real safety concerns, with a number of people boarding a moving vessel in rough conditions. We respect the right of everyone to express their point of view. It’s essential they do that with their safety and that of others in mind,” said a spokesperson.

The company added that oil and gas production was falling too quickly in the North Sea. “It is important to stop it tailing off too steeply, while the transition to low-carbon energy gathers pace. The new floating vessel will allow production from the Penguins field to continue to provide the necessary energy that the UK needs,” said a spokesperson.



📍 Greenpeace activists before heading out to board and occupy the Shell platform. Photograph: Chris J Ratcliffe/Greenpeace

Shell said the project was consistent with net zero pathways and would help reduce the UK’s reliance on costly, higher carbon imports. It said it was an old field - not a new one and added that 75% of the £25bn it planned to invest in the UK energy system over the next decade was intended for low and zero-carbon technology, including offshore wind, hydrogen and electric mobility.

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Greenpeace has calculated that burning all the gas and oil from the Penguins field could create 45m tonnes of CO₂ - more than the entire annual emissions of Norway.

The International Energy Agency has [called](#) for no further investment in fossil fuel projects, with research by the agency showing there is no room for new oil and gas if the world energy systems are going to reach net zero by 2050. The UN environment programme has [found](#) that current global fossil fuel production plans would lead to 57% more oil and 71% more gas than is safe to keep warming to 1.5C.



Greenpeace activists at sunrise prepare to board a Shell oil platform. Photograph: Getty Images

However, the UK government argues further exploration is necessary because the country remains heavily reliant on fossil fuels and production is declining in the North Sea. Ministers have also said that new supplies are essential for energy security. The latest government-sanctioned licensing [round](#) for offshore oil and gas attracted over 100 bids from 76 companies in January. There are already 27 licensed oil and gas projects, including the Cambo oil field, awaiting final approval. A further eight projects including Shell's Jackdaw project are ready to start producing gas and oil.

Article count [on](#)

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... as 2023 gathers pace, we have a small favour to ask. A new year means new opportunities, and we're hoping this year gives rise to some much-needed stability and progress. Whatever happens, the Guardian will be there, providing clarity and fearless, independent reporting from around the world, 24/7.

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Extinction Rebellion campaigners target private jets at Luton in Valentine's Day protest

ANGLIA

ENVIRONMENT

LUTON

LUTON AIRPORT

🕒 Tuesday 14 February 2023 at 4:17pm



Todd Smith, a former airline pilot, was part of the protest at Luton Airport.

Credit: ITV News Anglia

Climate campaigners blocked the private jet entrance at a major airport in a Valentine's Day protest.

Extinction Rebellion parked a boat in front of the gates to the private jet terminal at Luton Airport with protesters locked on to the deck and hull.

Another group of protesters barricaded the entrance to the Harrods Aviation Terminal at Luton, with activists locked on to two oil barrels.

More activists are gathered at both terminals dressed in hi-vis jackets, holding flags and banners in the style of airport signs, and wearing pink vests reading "LOVE IN ACTION".

The protesters are targeting what they call "supposedly romantic Valentine's Day dates", claiming 1% of the global population produces more than half of total aviation emissions.

Todd Smith, a former airline pilot turned activist, said: "Valentine's Day should not have to cost the Earth, or the taxpayer.

"The people want a ban on private jets, as Climate Assembly UK demonstrated in 2020. But nothing has been done.

"I can only assume the government has ignored the will of the people to protect the interests of their rich mates. We are here today to make them listen."

*Protesters outside the private jet entrance to Luton Airport.
Credit: Extinction Rebellion*

Extinction Rebellion said the government should take urgent action to ban private jets and tax frequent flyers.

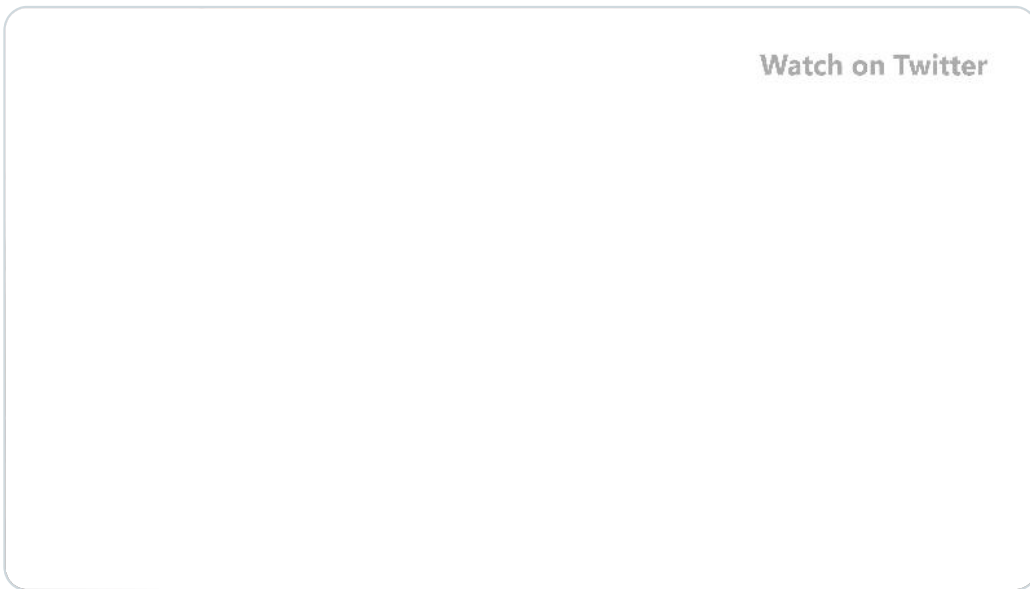
The protest is part of a global co-ordinated action launched last week by climate activists across 11 countries, which is targeting multiple sites in Europe, Australia, New Zealand, and the US.

♥ LOVE IN ACTION

✈️ XRUK have blocked the private air terminal at Luton this Valentine's Day, as frequent flyers make plans to impress dates with unnecessary flights.

🗓️ Want to find out about future actions in London?

Join us 🖱️
xrb.link/KL9yV7a1e



9:37 AM · Feb 14, 2023



♥ 5 💬 Reply ↗ Share

[Read 1 reply](#)

Nigel Harvey, 60, a recycling company chief executive and XR activist from St Albans, added: “Extinction Rebellion and other climate activist groups are often criticised for disrupting the lives of ‘normal working people’ – well it should be clear that owning a private jet isn’t normal.

"This is a targeted action – we’re disrupting only the top 1%: the highest-income, highest emitters who are most responsible for pollution and have the most power to affect changes.”

Luton Airport said the protest was not causing any operational impact.

A spokesman said: “We would like to reassure passengers that a peaceful protest taking place away from the main terminal, is not causing any disruption. Flights and access to the airport remain unaffected.”

Not in the UK? Visit the [Extinction Rebellion Global Website](#).



LOVE IN ACTION: Extinction Rebellion blockades Luton Airport private jet terminals in Valentine's Day protest

February 14, 2023 by Extinction Rebellion

Email: press@extinctionrebellion.uk

Phone: +44(0)7561098449

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#ExtinctionRebellion #LoveInAction

This morning, Extinction Rebellion and affiliated groups have blockaded the entrances to Luton Airport's Harrods Aviation and Signature private jet terminals to demand the government take urgent action to ban private jets, tax frequent flyers and make wealthy polluters pay.

F/1/369

EXHIBIT FL1 - T33

The protest is part of a global co-ordinated action launched last week by climate activists across 11 countries, which is targeting multiple sites in Europe, Australia, New Zealand, and the US.

Groups chose to take action today due to the rise in the use of private jet flights for supposedly romantic Valentine's Day dates, and to invite anyone watching to go to Parliament from April 21st to be part of 100,000 people calling for a citizen-led transition away from fossil fuels.[1]

"Valentine's Day should not have to cost the Earth, or the taxpayer," says former airline pilot-turned climate activist, Todd Smith. "The people want a ban on private jets, as Climate Assembly UK demonstrated in 2020. [2] But nothing has been done. I can only assume the government has ignored the will of the people to protect the interests of their rich mates. We are here today to make them listen."

Extinction Rebellion's iconic blue boat *Polly Higgins* is blocking all three gates to Luton Airport's Signature Terminal with protestors locked on to the deck and hull of the boat.

Another group of protestors is barricading the entrance to the Harrods Aviation Terminal, with activists locked onto two oil barrels.

More activists are gathered at both terminals dressed in hi-vis jackets, holding flags and banners in the style of airport signs, and wearing pink vests reading "LOVE IN ACTION".

Today's protest is part of the ongoing "Make Them Pay" campaign by Scientist Rebellion, Extinction Rebellion (XR), and Stay Grounded which has three key demands: ban private jets, tax frequent flyers and make polluters pay. [3]

Nigel Harvey, 60, a recycling company chief executive and XR activist from St Albans, added: "Extinction Rebellion and other climate activist groups are often criticised for disrupting the lives of 'normal working people' – well it should be clear that owning a private jet isn't normal. This is a targeted action – we're disrupting only the top 1%: the highest-income, highest emitters who are most responsible for pollution and have the most power to affect changes."

1% of the global population produces over a half of total aviation emissions [4], while 80% of the global population have never actually stepped foot onboard an aircraft [5]. Private jets are around 10 times more energy-intensive per passenger than commercial planes and 50 times more energy-intensive than trains. A four-hour flight in a private

jet emits as much as the average person does in an entire year. Yet private jet use remains subsidised and untaxed [6].

Sarah Hart, 41, mum of two from Farnborough said: *“The fact that our government turns a blind eye on these polluters is just further evidence of its failure to act on the climate & ecological emergency. We are calling for everyone to join us from 21 April outside the Houses of Parliament to make our voices heard and demand action on the climate & ecological crisis NOW.”*

Last year the Least Developed Countries (LDC) group representing the most climate-vulnerable countries at COP27, proposed a global aviation tax to pay for a climate ‘loss & damage’ fund for their countries [7] and cancel debt in the countries most affected by climate change so that they can afford to transition to low-carbon economies [8].

Finlay Asher, 32, an aerospace engineer from Bristol and co-founder of Safe Landing [9] said: *“I’m an aviation worker – but feel that I can’t stand-by watching the emissions from my industry continue to grow and contribute so heavily to the climate carnage wreaking havoc around the world.*

These impacts are mostly felt by the poorest communities, so it’s sickening to also realise that an elite minority of super-rich mega polluters are responsible for the majority of global emissions from air travel.”

— **Ends** —

Notes for Editors

Press contact for this action: Carol +44 (0)7791 737093

Email: xrsoutheastmedia@gmail.com

Link to photos: <https://show.pics.io/xr-global-media-breaking-news/search?tagId=63ea485fae3e7a001274b450>

REFERENCES

[1] The Big One <https://extinctionrebellion.uk/the-big-one/>

[2] Multiple citizens’ assemblies have produced such recommendations for the aviation sector, including:

- Climate Assembly UK recommendations:
 - “Ban polluting private jets and helicopters, moving to electric technology as it becomes available”
 - “**80%** of assembly members ‘strongly agreed’ or ‘agreed’ that taxes that increase as people fly more often and as they fly further should be part of how the UK gets to net zero. Assembly members saw these taxes as fairer than alternative policy options.
- Scotland’s Climate Assembly recommendations:
 - “Eliminate frequent flyer and air mile bonuses to reduce the number of flights taken for business, encouraging the use of alternatives like video conferencing for meetings.” – **92% agree**
 - “Discourage air travel by introducing a frequent flyer tax or levy.” – **78% agree**
 - <https://involve.org.uk/sites/default/files/field/attachemnt/Scotland%27s%20Climate%20Assembly%20Recommendations%20for%20Action.WebVersion%20%282%29%20%282%29.pdf>
- French Citizens’ Convention on Climate:
 - Limiting the adverse effects of air travel: “Adopt an enhanced eco-contribution per kilometre”, “Increasing fuel taxes for recreational aviation”, and “Promoting the idea of a European eco-contribution” – **88.1% agree.**
 - <https://democracy-international.org/final-propositions-french-citizens-convention-climate>

[3] “Make Them Pay” campaign website: <https://makethempay.info/>

[4] <https://www.transportenvironment.org/challenges/planes/price-of-flying/>

[4] The global scale, distribution and growth of aviation: Implications for climate change <https://www.sciencedirect.com/science/article/pii/S0959378020307779>

[5] <https://www.cnn.com/2017/12/07/boeing-ceo-80-percent-of-people-never-flown-for-us-that-means-growth.html>

[6] “Despite the disproportionate climate impact, private jets are untaxed in most European nations because of exemptions from the EU’s carbon pricing scheme (EU ETS) and untaxed kerosene.” <https://www.transportenvironment.org/discover/rising-use-of-private-jets-sends-co2-emissions-soaring/>

[7] ‘Loss & damage’ fund could raise more than \$100 billion a year: <https://www.theguardian.com/environment/2022/sep/19/vulnerable-countries-demand-global-tax-to-pay-for-climate-led-loss-and-damage>

[8] Cancel debt in the countries most affected by climate change:

<https://debtforclimate.org/>

[9] Safe Landing: <https://safe-landing.org/>

Explanation of *Frequent Flyer Levy* policy: <https://afreeride.org/>

ABOUT EXTINCTION REBELLION

- [The Big One April 21st 2023](#) | Find out about our biggest protest yet and to take part!
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- [XR Global website](#) | Discover what's going on in XR around the globe!

Time has almost entirely run out to address the ecological crisis which is upon us, including the 6th mass species extinction, global pollution, and increasingly rapid climate change. If urgent and radical action isn't taken, we're heading towards 4 ° C warming, leading to societal collapse and mass loss of life. The younger generation, racially marginalised communities and the Global South are on the front-line. No-one will escape the devastating impacts.

Extinction Rebellion believes it is a citizen's duty to rebel, using peaceful civil disobedience, when faced with criminal inactivity by their government.

Extinction Rebellion's key demands are:

Government must tell the truth by declaring a climate and ecological emergency, working with other institutions to communicate the urgency for change.

1. Government must tell the truth by declaring a climate and ecological emergency, working with other institutions to communicate the urgency for change.
2. Government must act now to halt biodiversity loss and reduce greenhouse gas emissions to net zero by 2025.
3. Government must create and be led by the decisions of a [Citizens' Assembly](#) on climate and ecological justice.

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Breaking: ‘Just Stop Oil’ youth campaigners deliver ultimatum to Boris Johnson

Press / February 14, 2022

Press Release – Monday 14th February, 10:30am

“If governments are serious about the climate crisis, there can be no new investments in oil, gas and coal, from now – from this year.”

Fatih Birol, Executive Director of the International Energy Agency [1]

Two young supporters of Just Stop Oil, a new campaign demanding that the government stops granting licences for new fossil fuel projects, delivered an ultimatum letter to 10 Downing Street this morning. [2]

Louis McKechnie, 21, announcing the delivery of the letter, made a brief speech to assembled reporters. [3]
He said:

“We know what needs to be done, it’s simple, Just Stop Oil. Right now. They are doing the opposite.”

F/1/374

EXHIBIT FL1 - 138

"Last year our Prime Minister told young people that our future is being stolen before our eyes, and that we have every right to be angry with those who aren't doing enough to stop it. He also said that his government wants to move beyond hydrocarbons completely and do it as fast as possible.

"Maybe some of us believed him, because we wanted it to be true. But right now, he and his Government are licensing new fossil fuel projects and failing to implement policies to cut carbon emissions. They are torching the Paris Agreement, and with it our future. It is a terrible betrayal"

Hannah Hunt, 23, from Brighton read out the contents of the letter to the Prime Minister. It points out that according to the International Energy Agency in order to have an even chance of limiting the global temperature rise to 1.5°C in line with the Paris Agreement, there can be no new investments in fossil fuel supply projects.

She said:

"You know, that to have an even chance of limiting the global temperature rise to 1.5°C in line with the Paris Agreement temperature there can be no more investment in new fossil fuel supply projects.

"You know that failing to stabilise temperatures below 1.5°C could be a death sentence for our children and for whole countries and regions of the world

"But you are poised to commit to the path of catastrophe by permitting multiple new fossil fuel projects"

"Just Stop Oil is demanding that: The UK government makes a statement that it will immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK.

"If you do not provide such assurance by March 14th 2022 it will be our duty to intervene – to prevent the ultimate crime against our country, humanity and life on earth."

ENDS

Press contact: 07762 987334

Email: juststopoil@protonmail.com

High quality photos and video footage available here:

<https://drive.google.com/drive/folders/1DgcuV5vJzfdSrdpX6HJEaayoidcO8xy>

Website: <https://juststopoil.org/>

Facebook: <https://www.facebook.com/JustStopOil/>

Twitter: https://twitter.com/juststop_oil

Youtube: <https://www.youtube.com/channel/UC-t4U1Azf8AOkCBJILSNBmw>

Notes to Editors:

[1] Quoted in the Guardian on the release of the International Energy Agency, May 2021- Net Zero by 2050: a Roadmap for the Global Energy Sector

[2] About Just Stop Oil

Just Stop Oil is a coalition of groups working together to demand that the government immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK.

We must urgently end our reliance on fossil fuels to avoid irreversible changes in the earth's climate system. We cannot continue to burn fossil fuels in the belief that future developments in carbon capture and storage and other so-called "unicorn technologies" will allow us to suck vast quantities of carbon dioxide from the atmosphere.

The UK must begin this process immediately. It starts by calling a halt to any further fossil fuel projects on the UK Continental Shelf. That would give us eight years of fossil fuel production left in which to rapidly transition to a zero carbon economy.

Everyone knows we have to engage in massive changes. Just Stop Oil is a coalition of groups demanding the no-brainer things be done immediately – actions that will reduce the demand for fossil fuel energy dramatically such as insulating our homes, rethinking how we travel, getting on with renewable energy and making sure no-one is left behind.

We either come together as humanity or we die. Youth know which they choose. They have already chosen. They are in the streets to demand a future. We are all in the streets to make sure they get it. It's as basic as that.

Further information about Just Stop Oil and our demands here: <https://www.juststopoil.org>

[3] **Full text of Louis McKechnie's speech**

Statement by Louis McKechnie 14 February, Downing Street

Thank you for being here today.

We've come today to ask the Government to meet its legal and moral obligations. Our Government is compelled by law to act, to avoid what it has recognised will be a catastrophic rise in global temperature. We know what needs to be done, it's simple, Just Stop Oil. Right now they are doing the opposite.

government wants to move beyond hydrocarbons completely and do it as fast as possible.

Maybe some of us believed him, because we wanted it to be true. But right now he and his Government are licensing new fossil fuel projects and failing to implement policies to cut carbon emissions. They are torching the Paris Agreement, and with it our future.

It is a terrible betrayal. We do not trust our lives to this broken Government. They are failing us.

We have not come to beg or to plead. We have come to make it known that we are not ready to give up on ourselves or those we love.

[4] Full text of letter from Just Stop Oil to the Prime Minister:

The Rt Hon Boris Johnson MP
The Prime Minister
10 Downing Street
London SW1A 2AA

JustStopOil@protonmail.com

14 February 2022

Dear Prime Minister.

On this Saint Valentine's Day, we send you this letter of love for our country.

You know, that to have an even chance of limiting global temperature rise, in line with the Paris Agreement there can be no more investment in new fossil fuel supply projects, because the International Energy Agency ("IEA"), the expert energy adviser to industrialised governments, has said so.

You know that breaching 1.5°C could be the death sentence for our children and for whole countries and regions of the world – your Government's own Net Zero Strategy makes that painfully clear and you personally emphasised it throughout COP26.

But only a few months later, you are poised to commit to the path of catastrophe by permitting multiple new fossil fuel projects after having allowed more coal-mining in Wales and a new oil and gas field in the North Sea. The UK retains the Presidency of the COP process until November this year. The eyes of the world are upon you and your signal to ignore climate scientists and the advice of the IEA.

Just Stop Oil is demanding that: The UK government makes a statement that it will immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK.

We will not be bystanders.

Just Stop Oil

Annex 1 – Impacts of breaching 1.5°C

1. Threat to global food security

Peer-reviewed research, *Increasing risks of multiple breadbasket failure under 1.5 and 2 °C global warming*, concludes:

“Risks of simultaneous crop failure ... increase disproportionately between 1.5 and 2 °C, so surpassing the 1.5 °C threshold will represent a threat to global food security.”

2. Whole regions of the world will be rendered uninhabitable

According to peer-reviewed research, beyond 1.5°C warming, tropical regions of the world risk wet bulb temperatures in excess of 35°C, which is beyond the capacity of the human body to cool itself down and therefore beyond the limit of human endurance. Around 40% of the world’s population currently live in the tropics. Billions of people will face a choice: live where it is no longer safe to live, or leave.

3. Critical tipping points could be passed, leading to a “hothouse earth”

In 2018, leading academics, including Johan Rockstrom and Hans Schellnhuber, considered the temperature threshold for crossing critical tipping points in the climate system in *Trajectories of the Earth System in the Anthropocene* and concluded:

“Our analysis suggests that the Earth System may be approaching a planetary threshold that could lock in a continuing rapid pathway toward much hotter conditions—Hothouse Earth ... Where such a threshold might be is uncertain, but it could be only decades ahead ...and ... it could be within the range of the Paris Accord temperature targets.”

What did the Government’s own *Net Zero Strategy* say, published in October 2021?

“People are rightly concerned, with the latest IPCC report showing that if we fail to limit global warming to 1.5°C above pre-industrial levels, the floods and fires we have seen around the world this year will get more frequent and more fierce, crops will be more likely to fail, and sea levels will rise driving mass migration as millions are forced from their homes. Above 1.5°C we risk reaching climatic tipping points like the melting of arctic permafrost – releasing millennia of stored greenhouse gases – meaning we could lose control of our climate for good. But the good news is that there is, still, a path to avoid catastrophic climate change.”

[Executive Summary, p.14]

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Thurrock Council issues S114 notice of financial distress

🕒 19 December 2022



SIMON DEDMAN/BBC

Chief executive Lyn Carpenter and council leader Rob Gledhill both resigned from their positions at Thurrock Council

F/1/379

EXHIBIT FL1 - 143

A Conservative-run council with a £469m funding black hole has declared itself in financial distress and barred itself from making any non-essential spending.

The acting director of finance at Thurrock Council in Essex has issued a section 114 notice.

It means a local authority is in financial distress, cannot balance its budget and is effectively bankrupt.

The council, which has seen resignations at the top, said it was seeking financial help from government.

"Today is a very worrying day but I see this as the start of our recovery," said the council's Conservative leader Mark Coxshall.

"Now we must look forward at how we can make a bright future for Thurrock.

"I am absolutely determined to make that happen with tough decisions and working with all our council's staff to do the right thing to get this council back on its feet."



| Thurrock Council's current funding gap is more than three times larger than its annual budget

Over the course of several years, Thurrock Council provided £655m to companies via bonds which included the **purchasing of 53 solar farms.**

Evidence obtained by The Bureau of Investigative Journalism (TBIJ), and seen by the BBC, revealed that, in March 2018, **financial advisors wrote to the council's former corporate director of resources to express concern** about the authority's "extreme" appetite for risk.

The council paused its investment policy in September 2020, and two years later, **the government said it was intervening because of the "serious financial situation"** and it appointed neighbouring Essex County Council as "commissioner" for Thurrock, which meant it oversaw any new spending.

At the time, council leader Rob Gledhill **resigned**, saying "the political buck stops with me".

The local authority's chief executive Lyn Carpenter, who had been on extended leave since the government intervention, **announced her resignation** last week.

Analysis

by **Simon Dedman, BBC Essex political correspondent**

Issuing the S114 notice formalises what we know - that Thurrock Council is in a perilous position financially.

It is part of the process of asking the government for financial support to get itself out of a huge £469m budgetary hole this year.

Things like cleaning streets, collecting rubbish and providing social services will still be carried out because they are among the services that Thurrock has a statutory obligation to provide.

There can be no spending on, say, a brand new playground.

Thurrock is going to have to accelerate looking at selling off assets, like land, housing and its theatre, which comedian Russell Brand **recently spoke out in support of saving**.

The council's financial shortfall is one of the largest ever reported by a UK local authority.

Croydon, Slough and Northamptonshire have also issued **section 114 notices** in recent years.

John Kent, the former leader of the council and current leader of the opposition Labour group, said staff would be fearing for their jobs and vulnerable people fearing for the "services they rely on".

"This disaster has been made and delivered by Thurrock Conservatives and it's high time they accept responsibility for their actions and resign," he said.

Mr Coxshall however said "residents and staff should feel safe" knowing that essential services such as street lighting, road gritting and social care would continue.

A full council meeting was scheduled for 9 January 2023.



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F/1/382

EXHIBIT FL1 - 146

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)

26th January 2023
Before Mrs Justice Foster DBE

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

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

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

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

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

Defendants

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 **1st to 222nd Defendants** and any further named Defendants with the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest by **all** of the following methods (4.1 – 4.5 to be treated conjunctively):

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

- 4.2 **Email:** sending a copy of this Order to Just Stop Oil, Youth Climate Swarm, Extinction Rebellion and Insulate Britain at the following email addresses: juststopoilpress@protonmail.com; youthclimateswarm@protonmail.com; press@extinctionrebellion.uk; insulatebritainpress@protonmail.com and providing a web link at which they can access the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order; and
- 4.3 **Post:** where an address of a named Defendant is known to the Claimants, by posting a copy of this Order together with a covering letter through the letterbox of the named Defendant's address (or by leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact that the package contains a court order. If the premises do not have a letterbox, or mailbox, or the package will not fit through the letterbox, a package may be left next to the front door and a notice containing this Order may be affixed to the front door marked with a notice drawing the recipient's attention to the fact that the package contains a court order and Claim Form and should be read urgently. The notices shall be given in the form set out in Schedule 2 to this Order; and
- 4.4 **Text messages:** sending a text message to any named Defendant for whom the Claimants have a mobile telephone number, notifying them that an injunction order has been granted against them with a power of arrest, and providing a web link at which the Defendant can access the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order. The notice shall be given in the form set out in Schedule 2 to this Order; and
- 4.5 **Placing signs:** on A-Road entry points and exit points to the administrative area of Thurrock, and within 50 metres of The Fuel Terminals and on the A130 and B1014 between the entrance to Canvey Island and the roundabout known as the Waterside Road roundabout on Canvey Island, stating that there is a High Court Injunction in place prohibiting protest on the highway and providing a web link and QR code at which the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest can be accessed; or
- 4.6 **Where requested:** the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest may be served by email where the Defendant has requested that they be served by email and by sending the email to the address provided by the Defendant; or
- 4.7 **Lawyers:** By serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.

5. The **deemed date of service** of any documents referred to in paragraph 4 above shall be the day on which service of the document or documents is completed in accordance with paragraph 4 above.
6. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission to serve the **223rd to the 229th 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
104. John Johnson
105. Hannah Johnston
106. Timothy Jones
107. Pascale Kann
108. Hallum Kelly
109. Linda Latter
110. Charles Laurie
111. Peter Lay
112. Eben Lazarus
113. Isobel Lewis
114. Elanor Lewis-Holmes
115. Joseph Linheart
116. El Litten
117. Rebecca Lockyer
118. Felix Lozano
119. Barbara Lund
120. Jacqueline Macey
121. Catharine Maclean
122. Jacob Main
123. Elizabeth McCormack
124. Eilidh McFadden
125. Nathan McGovern
126. Louis McKechnie
127. Lilah McKim
128. Grace McMeekin
129. Adalaide Meaney
130. Anna Middleton
131. Hannah Miles
132. Benjamin Mitchell
133. Darcy Mitchell
134. Deborah Mitchell
135. Teddy Monroe
136. Fiona Moore
137. Stefania Morosi
138. Paul Morozzo
139. Virgenia Morris
140. Paul Morrison
141. Zak Mullen
142. Alexandra Mulvey
143. Reuben Mychaleckyj
144. Richard Newell-Price
145. Ben Newman
146. Alexander Newnham
147. Jessica Norgard
148. Rachel Norris

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

199. Ferdi Suleyman
200. Vivien Talbot
201. Ben Taylor
202. Jacqueline Teggim
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

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.) (1) Madeline Adams (2)-(222) Other Named Defendants (223)-(229) Persons Unknown	

Name of defendant

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

Defendant's address

See attached continuation sheet



Date order made / / Name of judge

Order made under (insert statutory provision)

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

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)

This power of arrest was ordered on / / and expires on the / /

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

Claimant's address

Claimant's phone number

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

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

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

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

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

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

(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

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

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

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

Defendants

POWER OF ARREST: CONTINUATION SHEET

NAMES AND ADDRESSES OF DEFENDANTS

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

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

BROWN	MICHAEL	[REDACTED]	32
BRUCE	JUDITH	[REDACTED]	33
BUDD	MADELEINE	[REDACTED]	34
BURNS	TES	[REDACTED]	35
BUSE	BENJAMIN	[REDACTED]	36
CANNON	CATHERINE	[REDACTED]	37
CASSAR	REBECCA	[REDACTED]	38
CAUSBY	JESSICA	[REDACTED]	39
CHAMBERLAYNE	SUSAN	[REDACTED]	40
CHAPMAN	SALLY	[REDACTED]	41
CHAUHAN	VISHAL	[REDACTED]	42
CHESTERMAN	KATHERINE	[REDACTED]	43
CLARKE	PHILIPPA	[REDACTED]	44
CLEGG	OLIVER	[REDACTED]	45
COGHLAN	ORLA	[REDACTED]	46
COGHLAN	JOHN	[REDACTED]	47
COOK	RUTH	[REDACTED]	48
COOPER	HEATHER	[REDACTED]	49
CORKHILL HARRIS	JASMINE	[REDACTED]	50
CORRIGAN	JOY SUSAN	[REDACTED]	51
CRANE	RICHARD	[REDACTED]	52
CRAWFORD	DAVID	[REDACTED]	53
CROFT	ROSEMARY	[REDACTED]	54

DALDORPH	JOSEPH	[REDACTED]	55
DANIEL	BEVERLEY ANN	[REDACTED]	56
DELAP	BEN	[REDACTED]	57
DELAP	GAIE	[REDACTED]	58
DITTON	GABRIELLA	[REDACTED]	59
DJOMINS	IGORS	[REDACTED]	60
DOEHLEI	LAURA	[REDACTED]	61
DOUBLEDAY	MARGUERITE	[REDACTED]	62
EASON	ELLA	[REDACTED]	63
ESSEX	CHRISTINE	[REDACTED]	64
FLYNN	JANET	[REDACTED]	65
FORTON	MICHAEL	[REDACTED]	66
FREWER	PHOEBE	[REDACTED]	67
FRIEL	AMY	[REDACTED]	68
GARDNER	ROBIN	[REDACTED]	69
GETHING	CRESSIDA	[REDACTED]	70
GIBSON	ALASDAIR	[REDACTED]	71
GLASHIER	HUGO	[REDACTED]	72
GOLDER	STEPHANIE	[REDACTED]	73
GOLDRING	WILLIAM	[REDACTED]	74
GONZALEZ TRIMMER	XAVIER	[REDACTED]	75
GOODLAND	ALFIE	[REDACTED]	76
GOODWIN	EMMA-ROSE	[REDACTED]	77
GREENLAND	SOPHIE	[REDACTED]	78
GUNNING	AARON	[REDACTED]	79
HADDEN	LOUISA	[REDACTED]	80

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

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

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

PAGE HALL	SOPHIE	[REDACTED]	154
PARFITT	SUSAN	[REDACTED]	155
PARSONS	DILLON	[REDACTED]	156
PATTERSON	ROSE	[REDACTED]	157
PAUL	ETHAN	[REDACTED]	158
PEARS	ROSALIND	[REDACTED]	159
PERCY-RATCLIFF	ABIGAIL	[REDACTED]	160
PETHICK	URSULA	[REDACTED]	161
PHILLIPS	JACQUELINE	[REDACTED]	162
PHILLIPS-WHITE	MITCHEL	[REDACTED]	163
POSSNETT	ROBERT	[REDACTED]	164
POWELL	MATTHEW	[REDACTED]	165
PRICE	ROBERT	[REDACTED]	167
PRICE	EMILY	[REDACTED]	166
PRITCHARD	AMY	[REDACTED]	168
REEVES-WHYMARK	FELIX	[REDACTED]	169
RESTALLACK	ANNA	[REDACTED]	170
RICHARDS	ANNE	[REDACTED]	171
ROBERTS	BETHAN	[REDACTED]	172
ROBERTSON	JASMIN	[REDACTED]	173
ROBLYN	SEBASTIAN	[REDACTED]	174
ROCK	ISABEL	[REDACTED]	175

ROSSER	ELIZABETH	[REDACTED]	176
ROWE	CHRISTIAN	[REDACTED]	177
ROWETH	FINN	[REDACTED]	178
RUSSENBERGER	ADELHEID	[REDACTED]	179
SANDFORD	ISLA	[REDACTED]	180
SARGISON	DANIEL	[REDACTED]	181
SARGISON	JAMES	[REDACTED]	182
SCOTHORNE	CAT	[REDACTED]	183
SEBLEY	JAMES	[REDACTED]	184
SHARKEY	ROSA	[REDACTED]	185
SHARPLES	SOPHIE	[REDACTED]	186
SIDEY	SUSAN	[REDACTED]	187
SKEET	JAMES	[REDACTED]	188
SKWARSKA	HANNAH	[REDACTED]	189
SLADE	JACQUELINE	[REDACTED]	190
SLAUGHTER	OLIVER	[REDACTED]	191
SMARTKNIGHT	DAVID	[REDACTED]	192
SMITH	HEATHER	[REDACTED]	193
SMYTH	JOSHUA	[REDACTED]	194
SQUIRE	DAVID	[REDACTED]	195
STEER	KATHERINE	[REDACTED]	196
STEVENS	OLIVER	[REDACTED]	197
STEWART	MADELEINE	[REDACTED]	198

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

KENNEDY	AMOREL	[REDACTED]	220
LALLY	GRACE	[REDACTED]	221
MORGAN	MORIEN	[REDACTED]	222
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM			223
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM			224
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)			225
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PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)			227
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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 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 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

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

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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
ROUNDAABOUT KNOWN AS THE WATERSIDE ROAD ROUNDAABOUT

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

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

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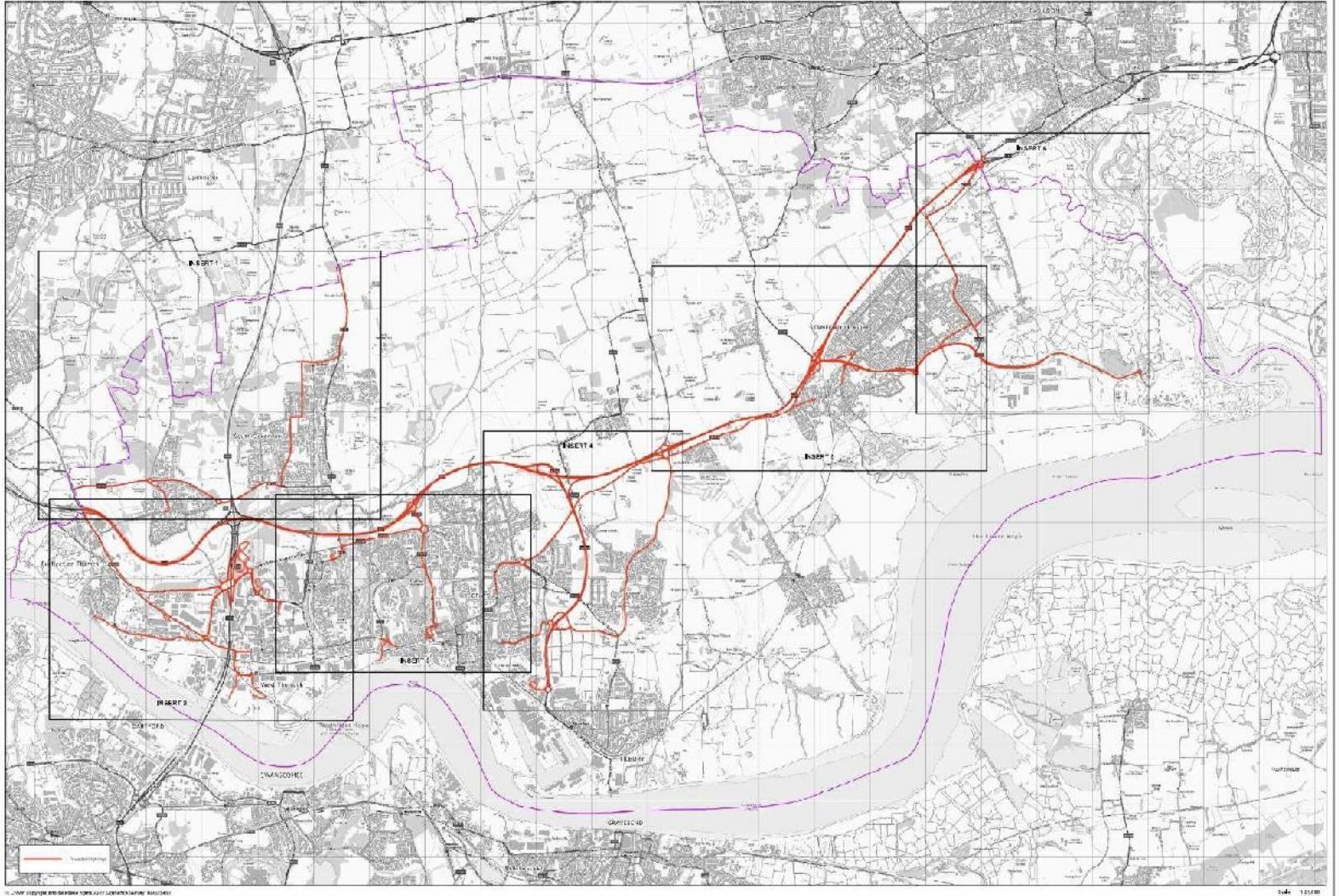
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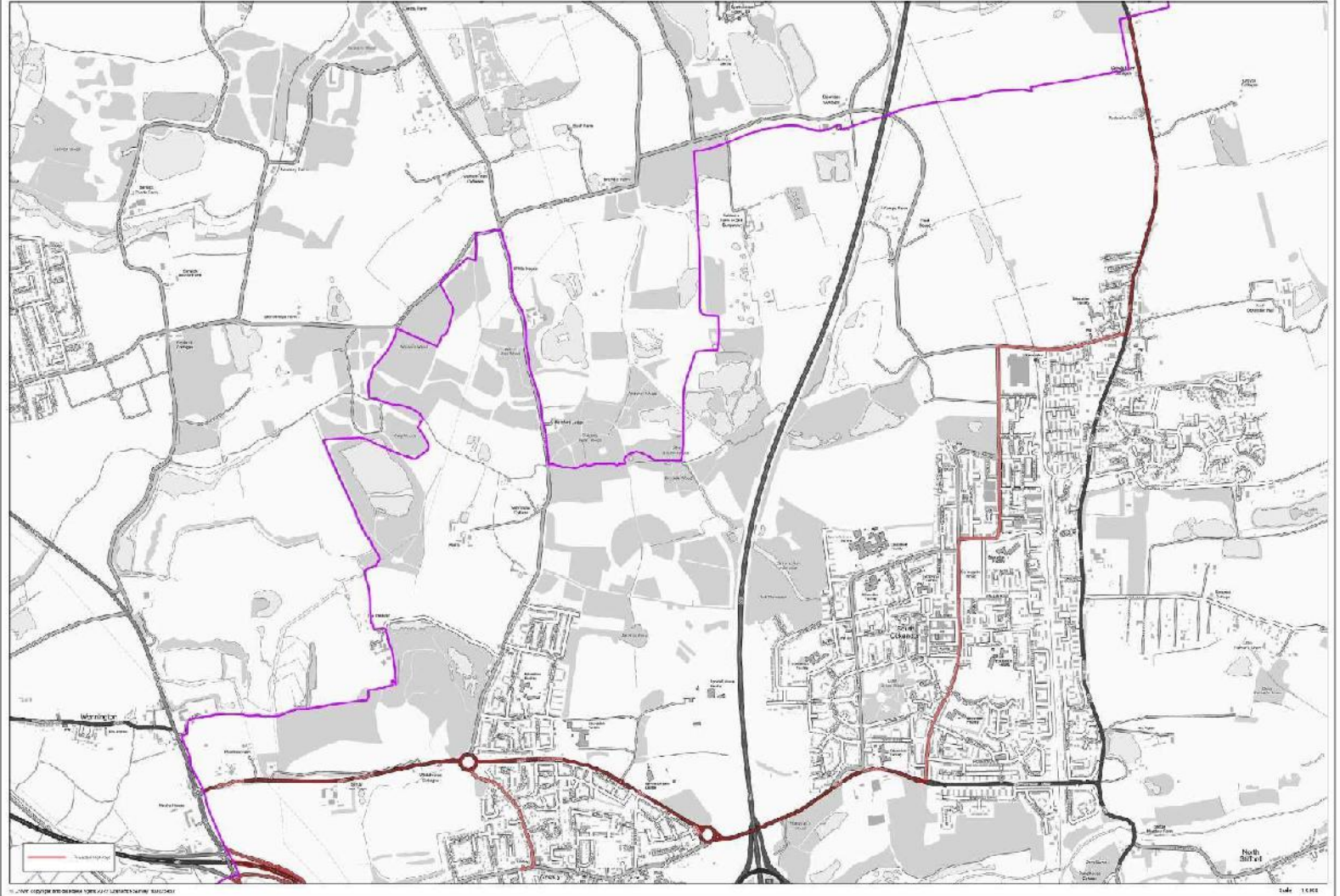
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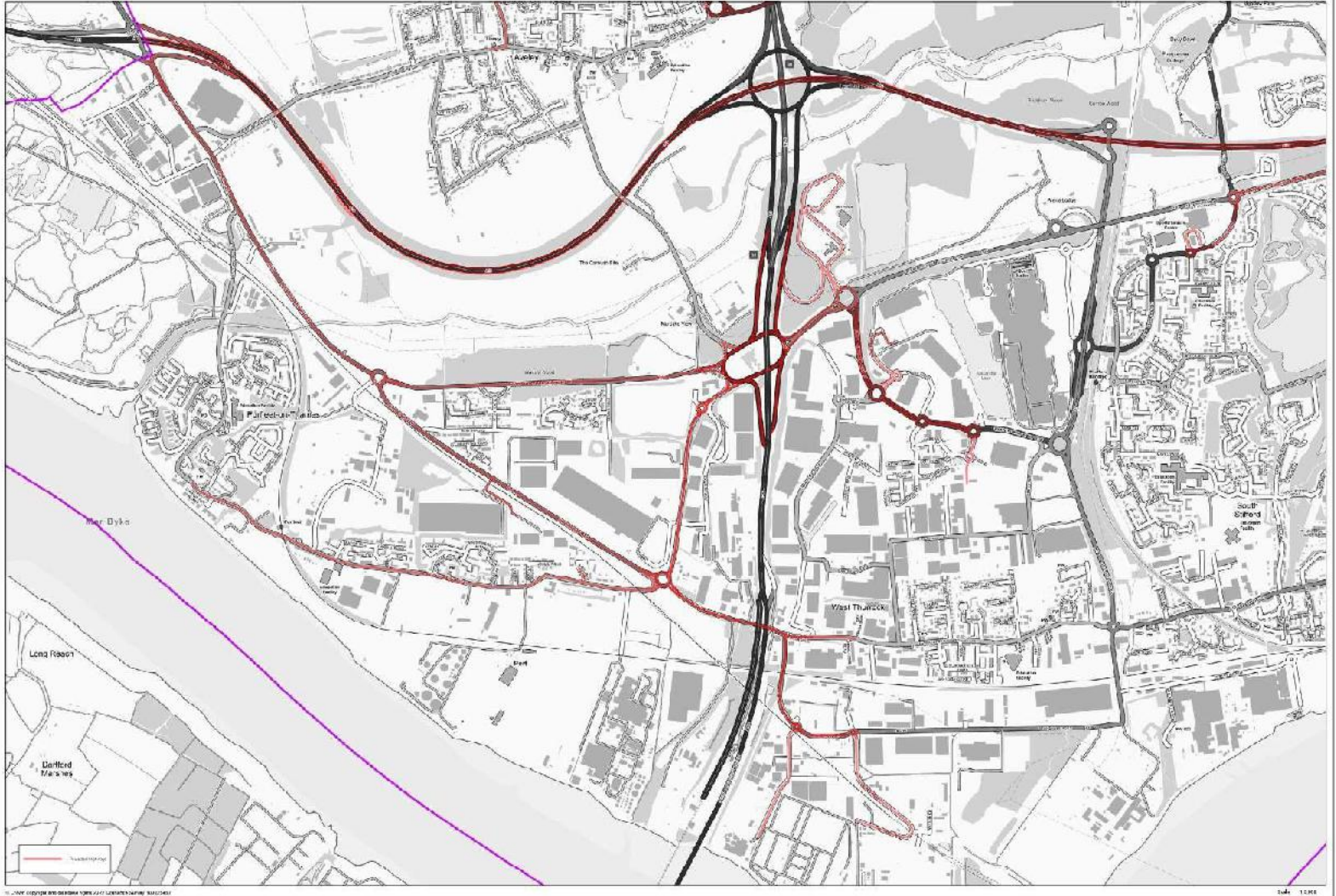
Defendants

ANNEXE 2

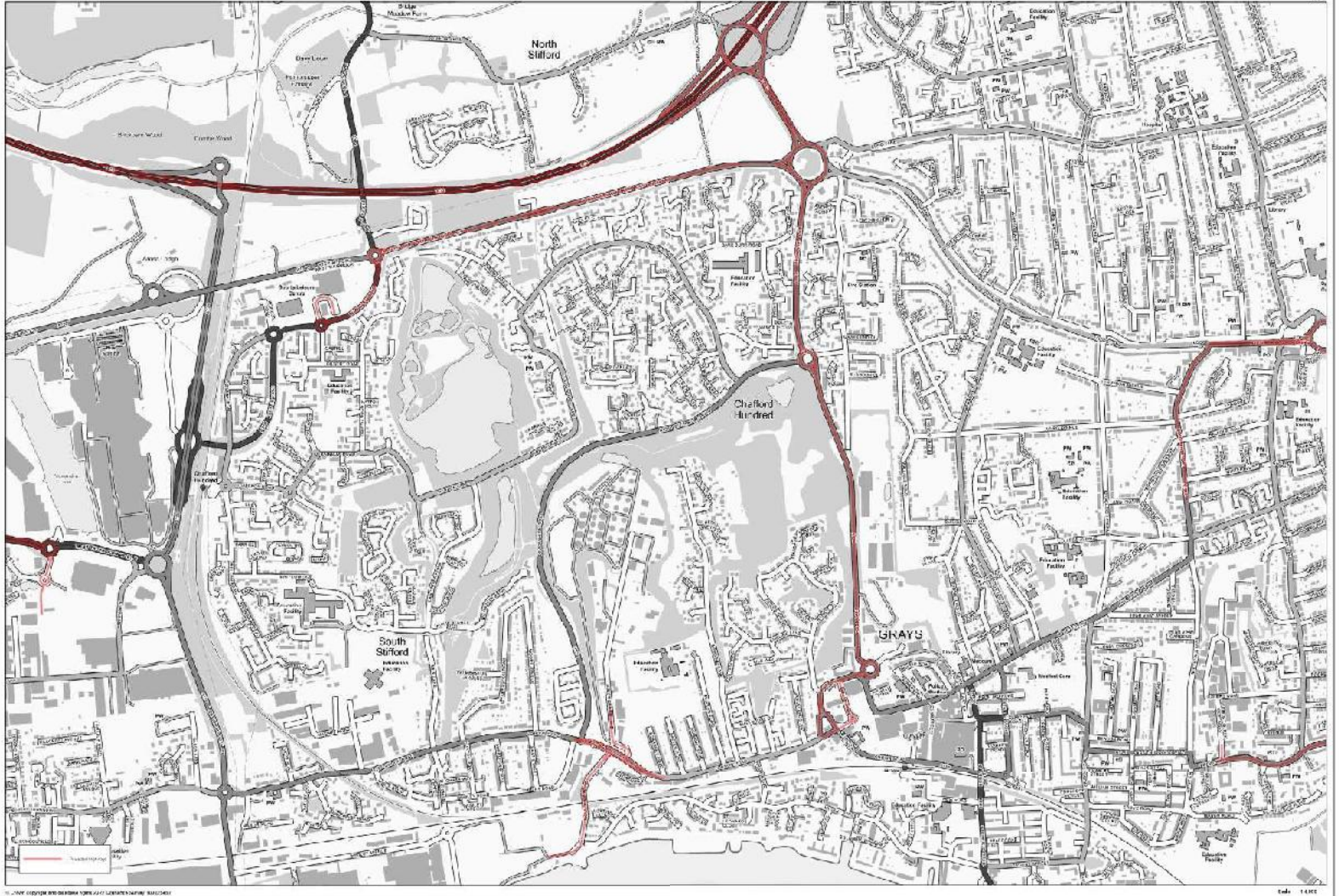




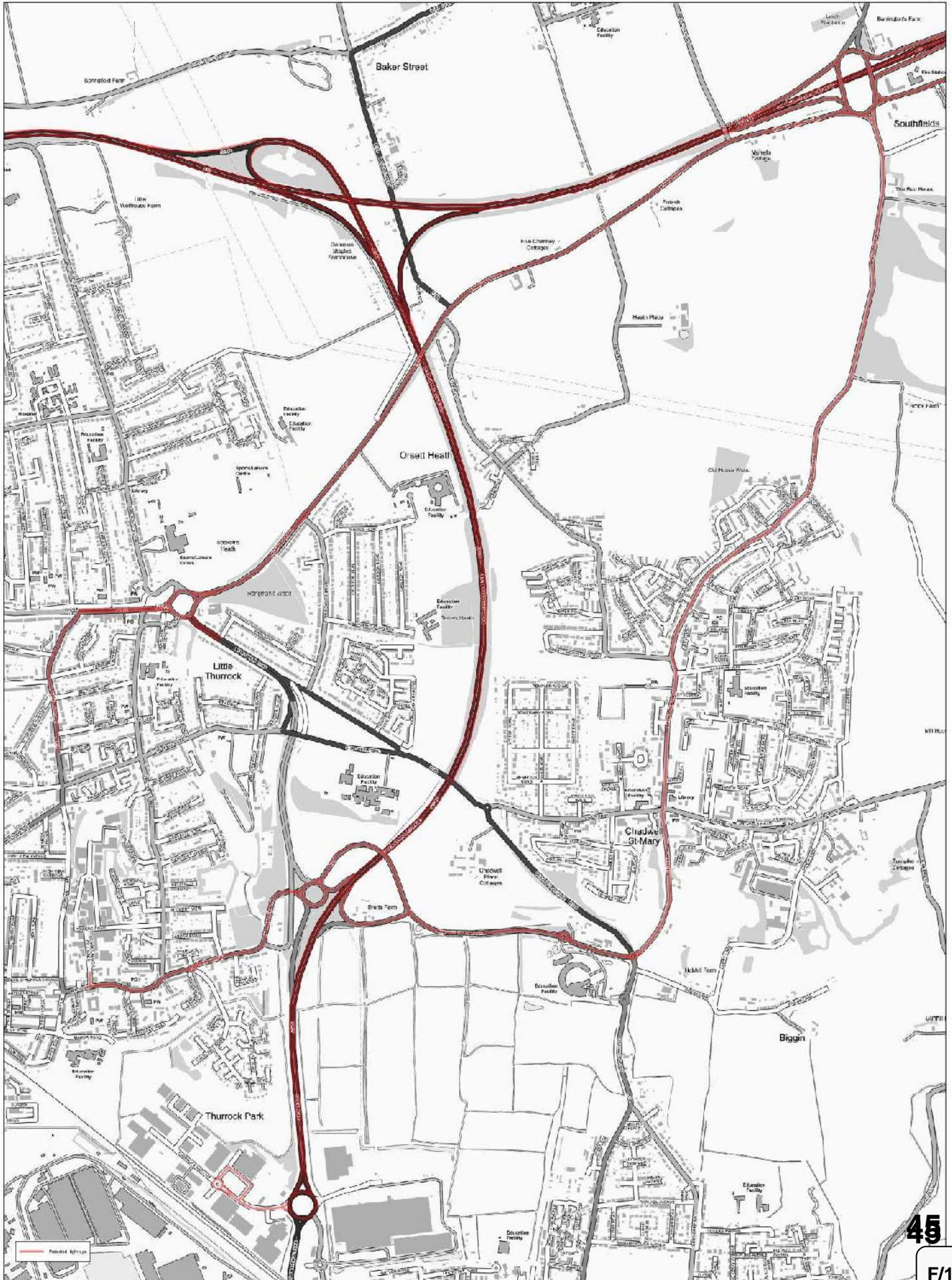
B 4

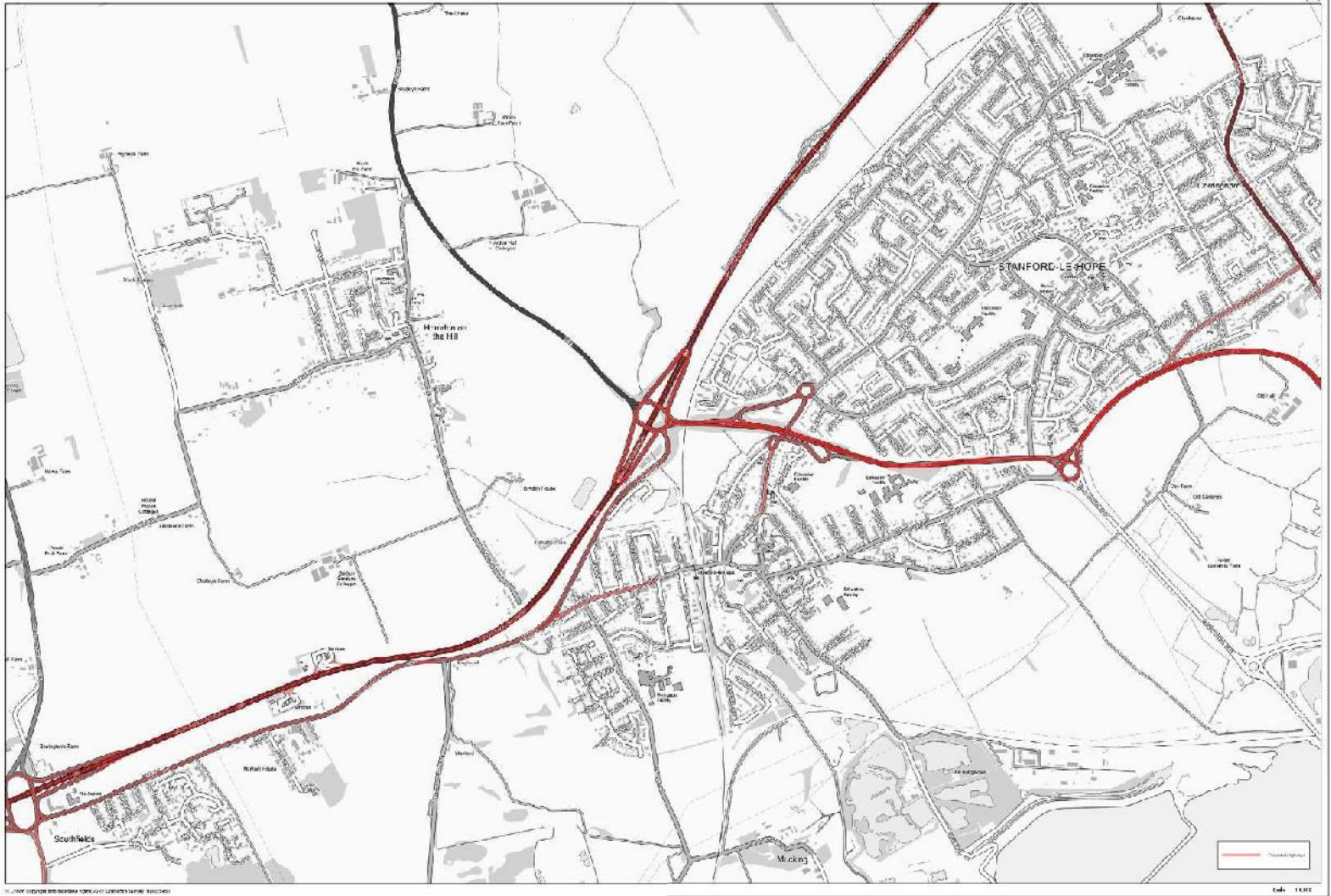


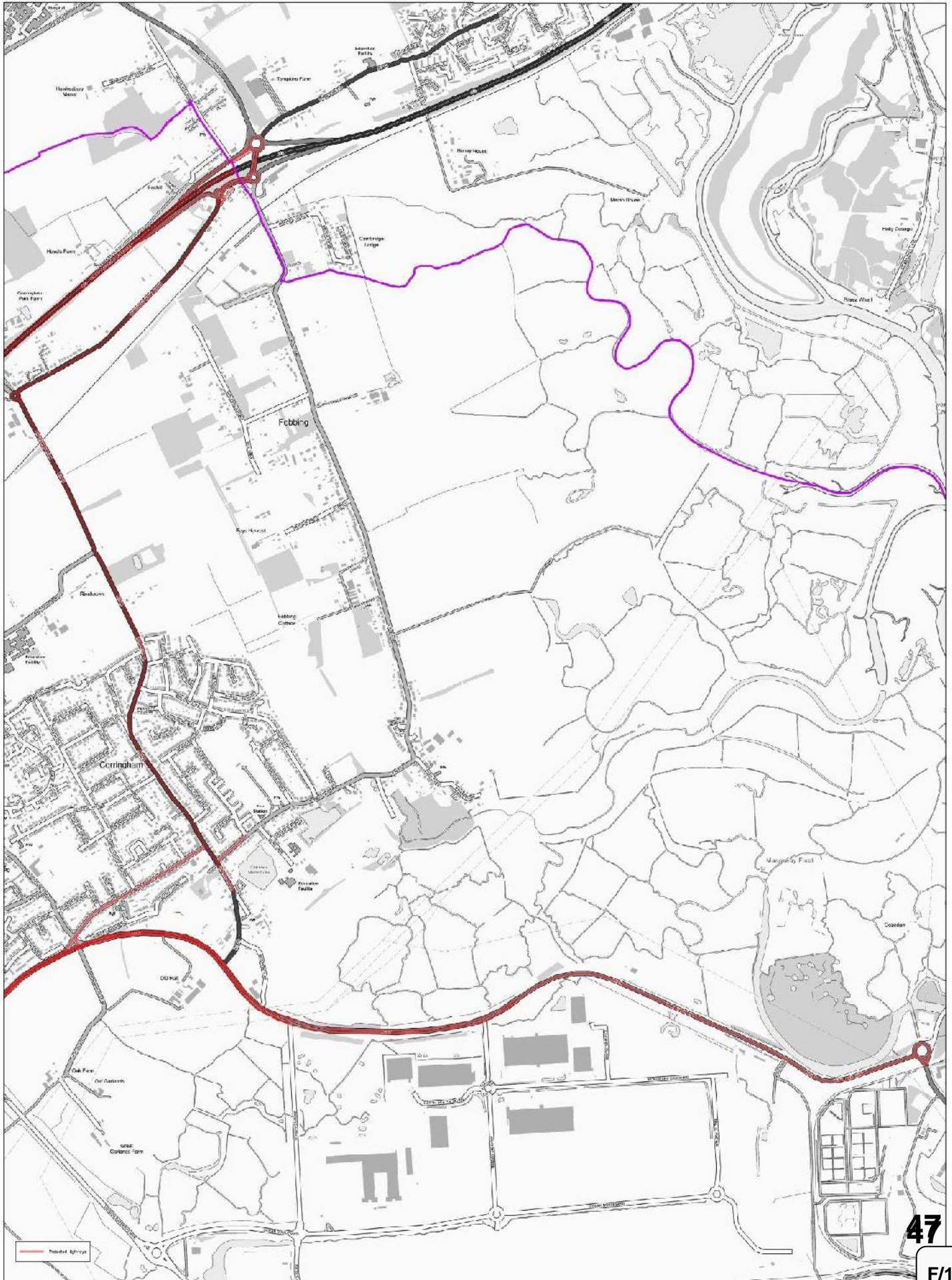
B 5



B 6







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

B E T W E E N :

(1) THURROCK COUNCIL

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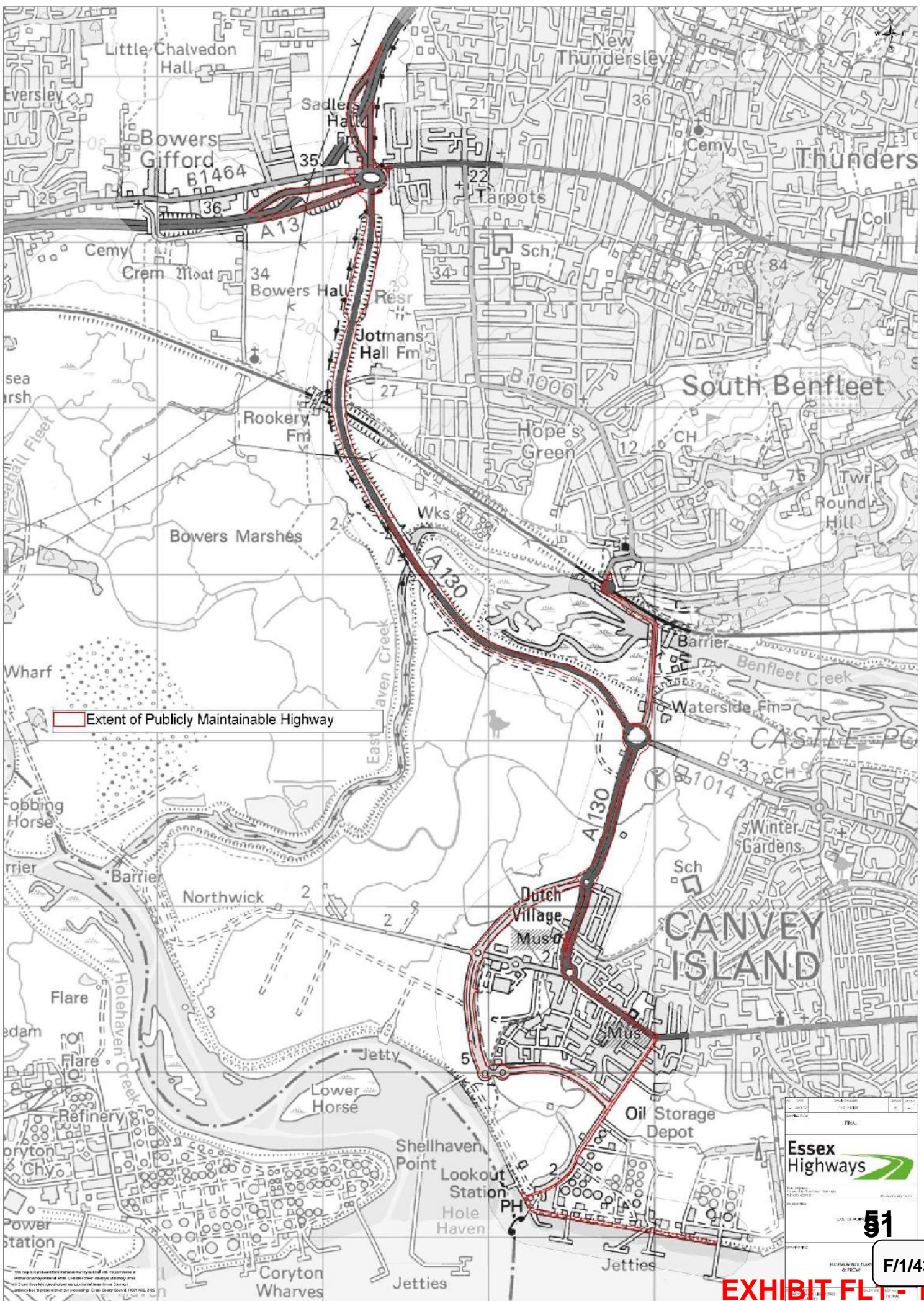
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Defendants

ANNEXE 3





IN THE HIGH COURT OF JUSTICE.
KINGS BENCH DIVISION

CLAIM No: QB-2022-000904

Before: Mr Justice Soole

On: 20 January 2023

BETWEEN

(1) VALERO ENERGY LIMITED
(2) VALERO LOGISTICS UK LIMITED
(3) VALERO PEMBROKESHIRE OIL TERMINAL LIMITED



QB-2022-000904

-and-

(1) PERSONS UNKNOWN ENTERING AND REMAINING WITHOUT THE CONSENT OF THE CLAIMANT(S) ON THE LAND KNOWN INFORMALLY AS PEMBROKE REFINERY, MANCHESTER TERMINAL, KINGSBURY TERMINAL, PLYMOUTH TERMINAL, CARDIFF TERMINAL, PEMBROKESHIRE TERMINAL AND AVONMOUTH TERMINAL AND MORE PARTICULARLY DESCRIBED IN THIS ORDER

(2) PERSONS UNKNOWN CAUSING BLOCKADES, OBSTRUCTIONS OF TRAFFIC AND/ INTERFERE WITH THE PASSAGE BY THE CLAIMANTS AND THEIR AGENTS, SERVANTS, EMPLOYEES, LICENSEES, INVITEES WITH OR WITHOUT VEHICLES AND EQUIPMENT TO, FROM, OVER AND ACROSS THE ROADS IN THE VICINITY OF THE LAND KNOWN INFORMALLY AS PEMBROKE REFINERY, MANCHESTER TERMINAL, KINGSBURY TERMINAL, PLYMOUTH TERMINAL, CARDIFF TERMINAL, PEMBROKESHIRE TERMINAL AND AVONMOUTH TERMINAL IN CONNECTION WITH ENVIRONMENTAL PROTESTS BY THE JUST STOP OIL AND/OR EXTINCTION REBELLION AND/OR INSULATE BRITAIN AND/OR YOUTH CLIMATE SWARM (ALSO KNOWN AS YOUTH SWARM) MOVEMENTS

(3) MRS ALICE BRENCHER AND 68 OTHERS

Defendants

ORDER

F/1/434

EXHIBIT FL1 - 198

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS 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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the review hearing pursuant to paragraph 17 of the Order of Mr Justice Cotter dated 20 September 2022

AND UPON the Claimants' Application for alternative service dated 9 January 2023 ("Application for Alternative Service")

AND UPON reading the documents in support of the Application for Alternative Service and the documents set out in the First Schedule to this Order

AND UPON hearing Myriam Stacey KC and Joel Semakula for the Claimants

AND UPON there being no appearance or representation on behalf of any defendant

AND UPON the Claimants giving the undertakings set out in the Second Schedule to this Order

AND UPON the Claimants confirming (for the avoidance of doubt) that this Order is not intended to prohibit lawful protest in the vicinity of the Claimants' Land which does not breach the terms of this Order, nor does the order seek to prevent lawful use of the Access Roads by any person.

IT IS ORDERED THAT:

Alternative Service Application

1. The Claimants are given retrospective permission under CPR Part 6.15 and CPR Part 6.27 to serve copies of the bundle for the hearing on 18 January 2023 and those witness statements pertaining to the hearing (being the statements listed as 11-13 in the First Schedule) , on those Named Defendants who have provided service addresses within the United Kingdom , by the alternative methods detailed below:

1.1 by uploading electronic copies of the hearing bundle and witness statements to an electronic folder on the existing Valero “Dropbox” website;

and

1.2 by writing to each of the aforementioned Named Defendants and:-

1.2.1 confirming that an electronic copy of the bundle and the new witness statements will be made available to view or download on the Dropbox site dedicated to this Claim, no later than 3 working days before the hearing;

1.2.2 supplying details of the Dropbox site link;

1.2.3 confirming that the Claimants will provide hard copies of the bundles and witness statements if requested to do so by a Defendant, either to the address which they have on record for that Defendant, or to such alternative address as the Defendant shall notify to the Claimants solicitors in writing or by bringing a hard copy of the bundle to the hearing for that Defendant to use.

2. The taking of such steps set out in paragraph 1 shall be good and sufficient service of the witness statements and the hearing bundle on those Named Defendants who have provided service addresses within the United Kingdom.

Order of 11 April 2022

3. The interim injunctions set out within paragraph 5 of the Order of Bennathan J dated 11 April 2022 as amended and restated by the Order of Cotter J dated 20 September 2022 are replaced by the interim injunctions contained in paragraph 5 of this Order.

Definitions

4. For the purposes of this Order,

4.1 the “**Claimants’ Land**” means all of the property referred to and defined in paragraph 5.1 hereof;

4.2 “**Site**” means the Claimants’ site at any location, forming part of the Claimants’ Land and identified in paragraph 5.1 of this Order, and which is either (i) from time to time wholly or substantially enclosed or bounded by walls, gates, fences, barriers, hedges, bodies of water or other man-made or natural boundary features or (ii) forms private roads and car parks outside of such enclosure or boundary feature;

4.3 the “**Access Roads**” means those parts of the roads in the vicinity of the Claimants’ Land which provide access to each of the sites forming parts of the Claimants’ Land, the location and extent of which are more particularly shown for identification purposes coloured variously red, yellow and blue on the plans annexed hereto at Annex I to this Order.

Injunction

5. With immediate effect until 23:59 on 8 February 2024, unless varied, discharged or extended by further order, the Defendants and each of them are forbidden from doing the following:

5.1 Entering or remaining upon any part of the following property without the Claimants’ permission:

- a) the First Claimant’s Site informally known as ‘Pembroke Refinery’ situated at Angle, Pembroke SA71 5SJ, the general location and extent of which is shown outlined in red on the plan exhibited hereto in Annex A (“**Pembroke Oil Refinery**”);

- b) the First Claimant's Site, informally known as 'Tanker berthing jetties at Pembroke Refinery' situated at Angle, Pembroke SA71 5SJ, the general location and extent of which is shown outlined in blue on the exhibited hereto in Annex B ("**Pembroke Oil Refinery Jetties**");
- c) the Second Claimant's Site, informally known as 'Manchester Terminal' situated at Trafford Wharf Road, Trafford, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex C (the "**Manchester Oil Terminal**");
- d) the Second Claimant's Site, informally known as 'Kingsbury Terminal' at Plot B Trinity Road, Kingsbury, Tamworth, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex D (the "**Kingsbury Oil Terminal**");
- e) the Second Claimant's Site informally known 'Plymouth Terminal' at Oakfield Terrace Road, Cattedown, Plymouth, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex E (the "**Plymouth Oil Terminal**");
- f) the Second Claimant's Site informally known as 'Cardiff Terminal' at Valero Refinery, Roath Dock, Rover Way, Cardiff CF10 4US, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex F (the "**Cardiff Oil Terminal**");
- g) the Second Claimant's Site informally known as 'Avonmouth Terminal', Avonmouth Dock, Bristol, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex G (the "**Avonmouth Oil Terminal**"); and

- h) the Third Claimant's Site informally known as 'Valero Pembroke Oil Terminal', Waterston, Milford Haven, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex H (the "**Pembrokeshire Terminal**");
- 5.2 Blocking any entranceway to the Claimants' Land;
 - 5.3 Damaging any part of the Claimants' Land;
 - 5.4 Affixing themselves to any other person or object on or otherwise to the Claimants' Land or the aforesaid parts of the Access Roads;
 - 5.5 Erecting any structure on the Claimants' Land or on the aforesaid parts of the Access Roads;
 - 5.6 Abandoning any vehicle or item on the aforesaid parts of the Access Roads;
 - 5.7 Tunnelling under or using or occupying existing tunnels under the aforesaid parts of the Access Roads with the intention of preventing their use;
 - 5.8 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 5.1 to 5.7 above;

Disclosure against non-party

- 6. Pursuant to CPR 31.17, the Chief Constables listed in the Third Schedule shall as soon as reasonably practicable upon request by the Claimants give disclosure by provision of copy of documents in the following classes to the Claimants:
 - 6.1 documents identifying the names and addresses of any person who is arrested by one of their officers in the course of, or as a result of the protests which are the subject of these proceedings at the Claimants' Land or on the Access Roads, in relation to conduct which may constitute a possible breach of the injunctions granted in these proceedings;
 - 6.2 arrest notes and other photographic material relating to possible breaches of the injunctions granted in these proceedings;

7. The duty of disclosure imposed by paragraph 6 of this Order shall be a continuing one, and shall continue until 23:59 on 8 February 2024.
8. Without the permission of the Court, the Claimants shall make no use of any document disclosed by virtue of paragraph 6 of this Order, other than one or more of the following uses:
 - (i) applying to name and join any person as a named defendant to these proceedings and to serve the said person with any document in these proceedings;
 - (ii) investigating, formulating and pleading and prosecuting any claim within these proceedings arising out of any alleged disruptive protest at any of the Claimants' sites which are (or become) the subject of these proceedings;
 - (iii) use for purposes of formulating, pleading and prosecuting any application for committal for contempt of court against any person for breach of any order made within these proceedings.
9. Until further order, the address and address for service of any person who is added as a defendant to these proceedings shall be redacted in any copy of any document which is served other than by means of it being sent directly to that person or their legal representative.
10. This Order shall be served on the Chief Constables listed in the Third Schedule.

Service

11. The Claimants will take the following steps by way of service of this Order and the documents listed in the First Schedule to this Order (to the extent that they have not already been served) (the “**Claim Documents**”) upon the First and Second Defendants:
 - 11.1 uploading electronic copies (in PDF form) to an electronic folder on the “Dropbox” website; and
 - 11.2 emailing electronic copies to the email addresses set out in the Appendix hereto.
12. The Claimants shall remove the existing signage advertising the existence of previous orders and shall:-

- 12.1.1 position new signs which are approximately 1.5m x 1m in size at each main entrance of Pembroke Oil Refinery, Manchester Oil Terminal, Kingsbury Oil Terminal, Plymouth Oil Terminal, Cardiff Oil Terminal, Pembrokeshire Terminal and Avonmouth Oil Terminal, advertising the existence of this Order and of the injunction prohibiting entry to the Site without the consent of the Claimants; and
 - 12.1.2 position 4 (four) signs, at conspicuous locations along each of Angle Road; the emergency services access road at Pembroke Oil Refinery; Churchill Way; Trafford Wharf Road; Trinity Road; Piccadilly Way; the privately owned road at the Kingsbury Oil Terminal; Oakfield Terrace Road; Rover Way; Holesmouth Road; King Road Avenue; and 5th Street which are approximately 1.5m x 1m in size, advertising the existence of this Order and the prohibitions upon obstructing the Access Roads (together with a map of the relevant site of at least A2 size identifying the extent of the Access Roads relating to that particular Site);
 - 12.1.3 the aforesaid signs shall include a link to the Dropbox folder and the Claimants' solicitors' contact details.
13. The Claimants will take the following steps by way of service of this Order and the Claim Documents upon the Named Defendants who have failed to provide an address for service in the United Kingdom:
- 13.1 uploading electronic copies to an electronic folder on the "Dropbox" website; and
 - 13.2 emailing electronic copies of the same (in PDF format) to the various email addresses associated with the protest groups that have previously threatened to and indeed carried out the unlawful activities (as set out in the Appendix to the Order) with the words FOR THE URGENT ATTENTION OF [NAME]" in the email heading and the words "VERY URGENT: ATTACHED TO THIS EMAIL IS AN ORDER OF THE HIGH COURT OF ENGLAND AND WALES WHICH OUGHT TO BE BROUGHT TO THE ATTENTION OF [NAME]. [NAME] SHOULD READ THIS EMAIL AND ITS ATTACHMENTS IMMEDIATELY. IF HARD COPIES OF THE ATTACHED DOCUMENTS ARE REQUIRED, [NAME] SHOULD

PROVIDE AN ADDRESS FOR SERVICE OF THE SAME WITHIN THE UNITED KINGDOM BY EMAILING valero.service@shoosmiths.co.uk” in bold letters in the body of the covering email.

14. This Order shall be personally served upon those Named Defendants who have provided addresses for service within the United Kingdom.
15. The taking of such steps set out at paragraphs 11-14 shall be good and sufficient service of this Order and of the Claim Documents, upon the Defendants and each of them.
16. The Court will provide sealed copies of this Order to the Claimants’ solicitors for service (whose details are set out below).
17. The deemed date of service of the Claim Documents shall be the date of the relevant certificate of service on completion of the steps described at paragraphs 11-14.

Further directions

18. 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 immediately by emailing valero.service@shoosmiths.co.uk.
19. Any person applying to vary or discharge this order must provide their full name and address, and address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.
20. The Claimants have liberty to apply to extend, vary or discharge this Order, or for further directions.
21. No acknowledgment of service, admission or defence is required by any party until further so ordered.
22. This Order will be reconsidered at a hearing to be listed between 16 and 27 January 2024 to determine whether there is a continued threat which justifies its continuation.
23. Costs reserved.

Communications with the Claimants

24. The Claimants' solicitors and their contact details are:

Shoosmiths LLP
2 Colmore Square
38 Colmore Circus Queensway
Birmingham
B4 6SH
(Ref: M-1000643)
E: valero.service@shoosmiths.co.uk
T: 03700863000

Dated: 20 January 2023

First Schedule

Documents considered by the Court at the hearing:

1. Re-Amended Claim Form dated 26 September 2022
2. Application notice dated 6 April 2022 and draft minute of proposed order
3. Witness statement of Adrian Rafferty, dated 18 March 2022
4. Redacted witness statement of David Blackhouse, dated 18 March 2022
5. Witness statement of David McLoughlin, dated 18 March 2022
6. Witness statement of Kate McCall, dated 18 March 2022
7. Witness statement of David Blackhouse, dated 5 April 2022
8. Witness statement of Kate McCall, dated 6 April 2022
9. Witness statement of Laurence Matthews, dated 6 April 2022
10. Witness statement of Richard Willcox dated 27 April 2022
11. Witness statement of David Blackhouse, dated 11 January 2023
12. Witness statement of Kate McCall, dated 9 January 2023
13. Witness statement of Aimee Cook, dated 11 January 2023

Second Schedule

Undertakings given by the Claimants to the Court:

1. To file the Claimants' solicitors' note of this hearing by the end of the next working day after the sealing of this Order.
2. By 4pm on 20 January 2023, to file a further witness statement as to the postal service by letters dated 10 January 2023 of the documents referred to below:
 - a. Claimants' Application for alternative service dated 9 January 2023 and supporting Witness Statement of Kate McCall (fourth) dated 9 January 2023;
 - b. Witness Statements of:-

David Blackhouse (third), dated 11 January 2023
Kate McCall (third), dated 9 January 2023
Aimee Cook (first), dated 11 January 2023

- c. Instructions on how to access the Dropbox site containing the Bundle for the hearing on 18 January 2023
3. To provide to any named defendant with copies of further evidence or other documents filed in these proceedings upon request from time-to-time at an email address provided to the Claimants and place all such documents online to be publicly accessible via Dropbox link
4. To comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a defendant and the Court finds that the defendant ought to be compensated for that loss.
5. To seek to identify and name defendants and apply to add them as named defendants to this Order as soon as reasonably practicable.

Third Schedule

The Chief Constables:

1. The Chief Constable of Devon & Cornwall Police
2. The Chief Constable of Dyfed-Powys Police
3. The Chief Constable of Avon & Somerset Police
4. The Chief Constable of Greater Manchester Police
5. The Chief Constable of South Wales Police
6. The Chief Constable of Warwickshire Police

ANNEXURE A
(“Pembroke Oil Refinery”)



ANNEXURE B

(“Pembroke Oil Refinery Jetties”)



ANNEXURE C
(“Manchester Oil Terminal”)



ANNEXURE D
(“Kingsbury Oil Terminal”)



ANNEXURE E
(“Plymouth Oil Terminal”)



ANNEXURE F
(“Cardiff Oil Terminal”)



ANNEXURE G
("Avonmouth Oil Terminal")



ANNEXURE H
(“Pembrokeshire Terminal”)



ANNEXURE I
("Access Roads")



The "Refinery Map"

Green = Jetty

Popton Fort

Milford Haven

Valero Energy Pembroke

Pembroke Refinery

Valero

Rhoscrowther

Pwllcrochan

Main Entrance

Auxilliary Admin/Car Park Entrance

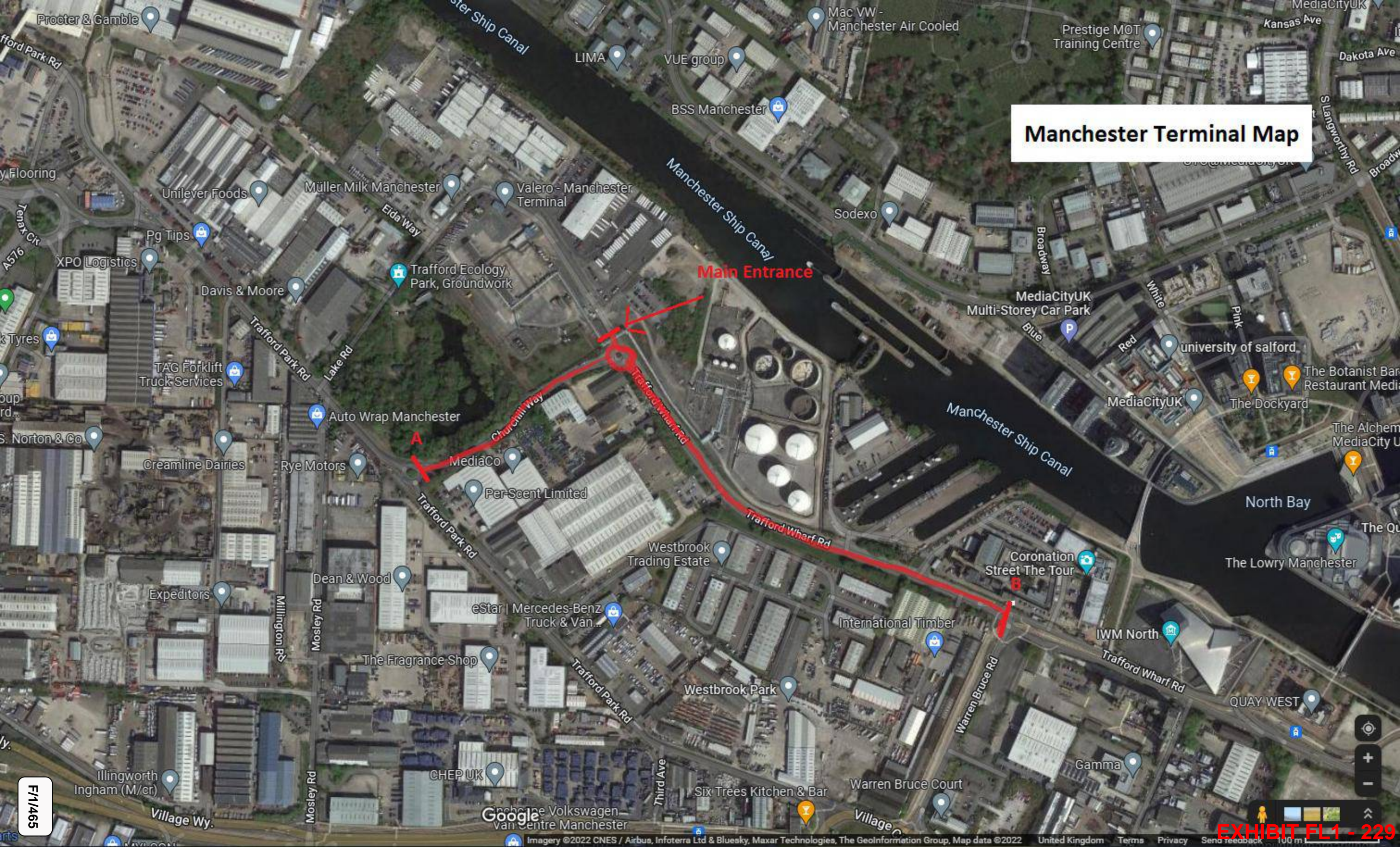
B

A

F/11/464

EXHIBIT FL1 - 228

Manchester Terminal Map



F/11465

Kingsbury Terminal Map 1

Emergency Access Gate

Thistlewood Brook

Trinity Rd

Thistlewood Brook

Main Entrance

Valero Energy

Certas Energy

Aquila Truck Centres

British Pipeline Agency

Google

B

Trinity Rd

Piccadilly Way

A

Trinity Rd

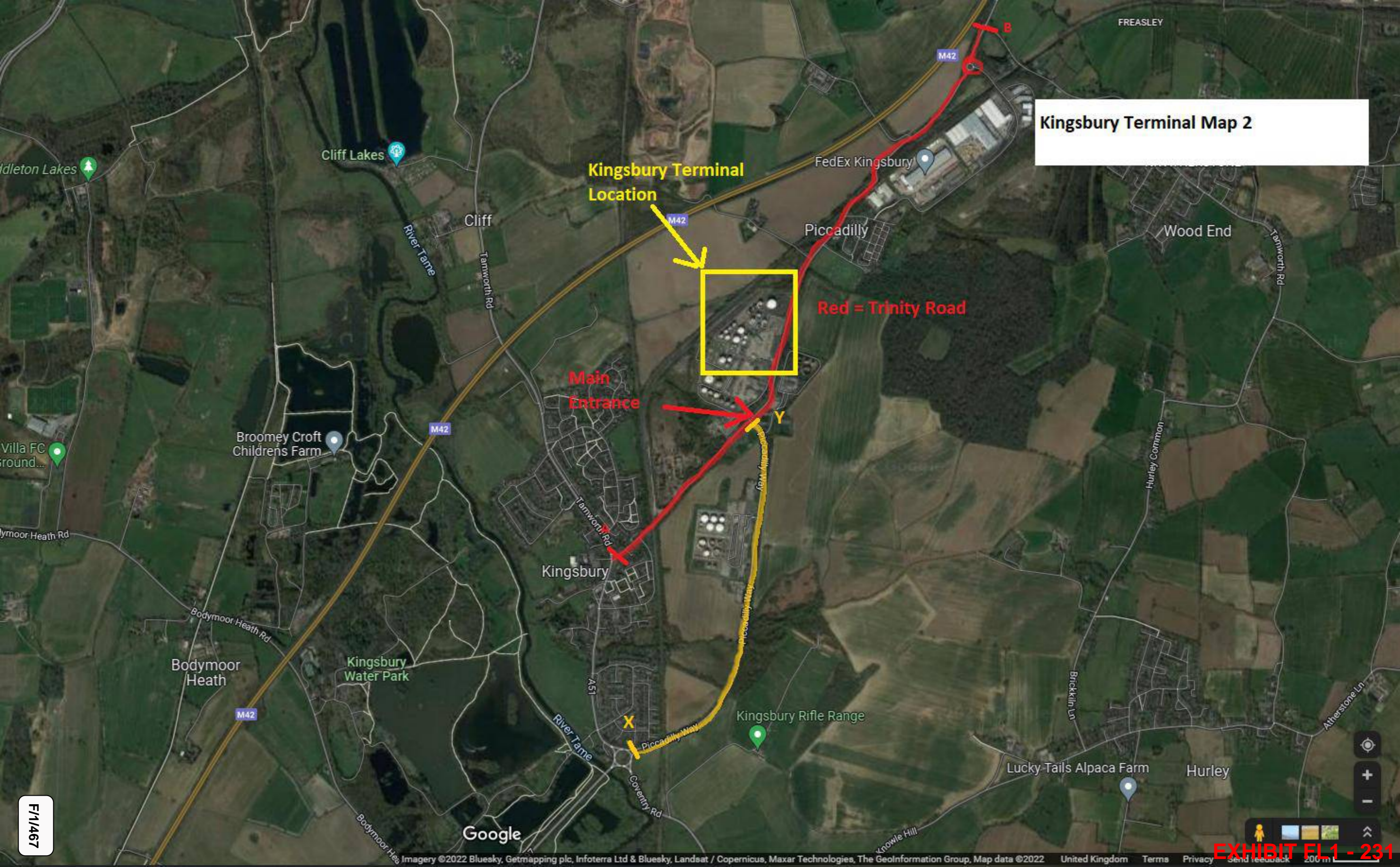
Piccadilly Recreation Ground

Car Park P

Sorrell Dr

F/11466

Kingsbury Terminal Map 2



Kingsbury Terminal Location

Red = Trinity Road

Main Entrance

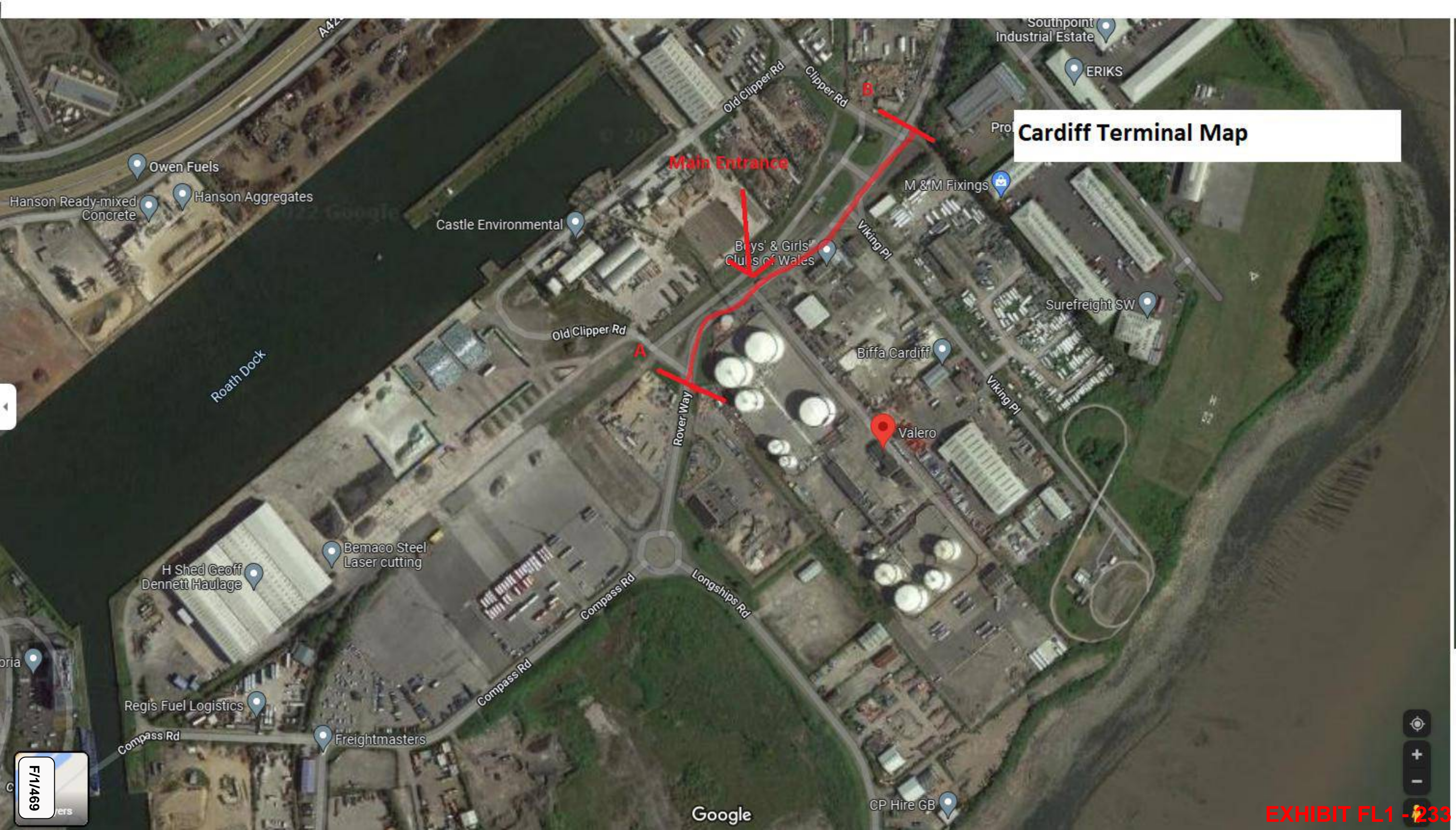
F/11467

Plymouth Terminal Map



F/11468

Cardiff Terminal Map



Main Entrance

Boys' & Girls' Clubs of Wales

Valero

F/11469

Google

EXHIBIT FL1 - 233

Yellow = Valero Premises

Avonmouth Terminal Map 2



Balfour Beatty - Bristol

BCA Bristol

Co-op Avonmouth

Smoke Ln

St Andrew's Rd

Accolade Wines

Kings Weston Ln

Asda Bristol CDC Distribution Centre

Avonmouth Household Waste Recycling Centre

Culina Avonmouth

Amazon DE

St Andrew's Rd

Kings Weston Ln

M49

18A

Kings Weston Ln

Ocado CFC Bristol

TeamSport Go Karting Bristol

AVONMOUTH

Costco Wholesale - Bristol

M5

M5

M49

A4

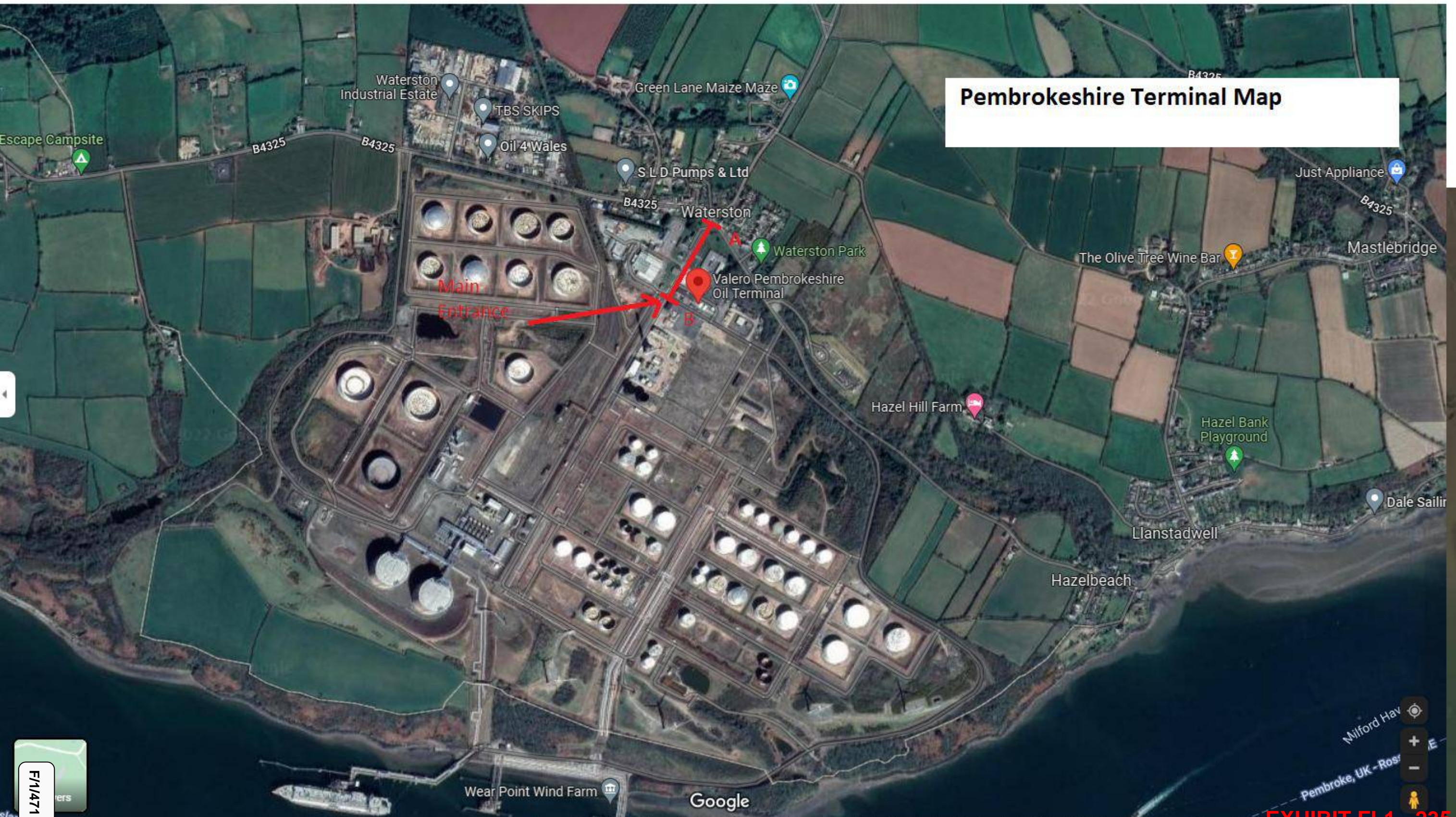
B4054

18

Google

F/11470

Pembrokeshire Terminal Map



F/11471

Appendix

Extinction Rebellion UK

- (i) enquiries@extinctionrebellion.uk
- (ii) press@extinctionrebellion.uk
- (iii) xrvideo@protonmail.com
- (iv) xr-action@protonmail.com
- (v) xraffinitysupport@protonmail.com
- (vi) xr-arrestwelfare@protonmail.com
- (vii) artsxr@gmail.com
- (viii) xr-CitizensAssembly@protonmail.com
- (ix) xr.connectingcommunities@gmail.com
- (x) xrdemocracy@protonmail.com
- (xi) xrnotables@gmail.com
- (xii) integration@rebellion.earth
- (xiii) xr-international@protonmail.com
- (xiv) xr-legal@riseup.net
- (xv) press@extinctionrebellion.uk
- (xvi) xr-newsletter@protonmail.com
- (xvii) : xr-peoplesassembly@protonmail.com
- (xviii) xrpoliceliason@protonmail.com
- (xix) rebelringers@rebellion.earth
- (xx) xr.regenerativeculture@gmail.com
- (xxi) xr-regionaldevelopment@protonmail.com
- (xxii) RelationshipsXRUK@protonmail.com
- (xxiii) xr.mandates@gmail.com
- (xxiv) socialmedia@extinctionrebellion.uk
- (xxv) xrsocialmediaevents@gmail.com
- (xxvi) eventsxr@gmail.com
- (xxvii) xrbristol.regional@protonmail.com
- (xxviii) xrcymru@protonmail.com
- (xxix) xr.eastengland@protonmail.com
- (xxx) xrlondoncoord@gmail.com
- (xxxii) XRMidlands@protonmail.com

- (xxxii) xrne@protonmail.com
- (xxxiii) support@xrnorth.org
- (xxxiv) xrni@rebellion.earth
- (xxxv) xrscotland@gmail.com
- (xxxvi) XR-SouthEastRegionalTeam@protonmail.com
- (xxxvii) xr.regional.sw@protonmail.com
- (xxxviii) talksandtraining.xrbristol@protonmail.com
- (xxxix) xrcymrutalksandtraining@gmail.com
- (xl) eoexrtnt@protonmail.com
- (xli) xrlondoncommunityevents@gmail.com
- (xlii) xrmidlandstraining@protonmail.com
- (xliii) XRNE.training@protonmail.com
- (xliv) xrnw.training@gmail.com
- (xlv) xryorkshire.training@gmail.com
- (xlvi) xrni.tt@rebellion.earth
- (xlvii) talksandtrainings.scotland@extinctionrebellion.uk
- (xlviii) xrtse@gmail.com
- (xlix) xrsw.trainings@gmail.com

Just Stop Oil

- (l) Ring2021@protonmail.com
- (li) juststopoil@protonmail.com

Youth Climate Swarm

- (lii) youthclimateswarm@protonmail.com

Insulate Britain

- (liii) Ring2021@protonmail.com
- (liv) iblegal@protonmail.com

IN THE HIGH COURT OF JUSTICE.

CLAIM No: QB-2022-001142

QUEEN'S BENCH DIVISION

Before: The Hon Mr Justice Bennathan

On: 29 April 2022

BETWEEN :

**(1) EXOLUM PIPELINE SYSTEM LIMITED
(2) EXOLUM STORAGE LTD
(3) EXOLUM SEAL SANDS LTD**



Claimants

and

QB-2022-001142

(1) PERSONS UNKNOWN ENTERING OR THREATENING TO ENTER AND REMAIN WITHOUT CONSENT ON LAND KNOWN INFORMALLY AS EXOLUM'S GRAYS, BRAMHALL, SEAL SANDS, MISTERTON, HALLEN, THETFORD AND SAFFRON WALDEN TERMINALS AND MORE PARTICULARLY DESCRIBED IN ANNEX A TO THE CLAIM FORM, DATED 6 APRIL 2022

(2) PERSONS UNKNOWN CAUSING OR THREATENING TO CAUSE THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE AND SAFE FLOW OF TRAFFIC AND ACCESS ONTO OR ALONG THE ACCESS ROADS (AS DESCRIBED IN ANNEX A TO THE CLAIM FORM, DATED 6 APRIL 2022) IN CONNECTION WITH PROTEST ACTIVITIES UNDER OR IN CONNECTION WITH THE JUST STOP OIL, YOUTH CLIMATE SWARM, EXTINCTION REBELLION, AND/OR INSULATE BRITAIN MOVEMENTS

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS 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

F/1/474

EXHIBIT FL1 - 238

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimants' Application by Application Notice for an interim injunction dated 6 April 2022 **(the "Application")**

AND UPON the Court having granted relief on a without notice basis on 8 April 2022

AND UPON the return date for the Application

AND UPON READING the Application and the witness statements of Mark Ernest O'Neill and David John Cook dated 6 April 2022 and the witness statement of Mark Ernest O'Neill dated 27 April 2022 **(the "Witness Statements")**

AND UPON hearing Leading Counsel for the Claimants

AND UPON the Court accepting the Claimants' undertaking that the Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a defendant and the Court finds that the defendant ought to be compensated for that loss

AND UPON the Claimants confirming (for the avoidance of doubt) that this Order is not intended to prohibit protest in the vicinity of the Terminals which does not breach this Order, nor to prevent lawful use of the Access Roads by any person

IT IS ORDERED THAT:

Definitions

1. For the purposes of this Order:

- 1.1 the “**Terminals**” are the Claimants’ terminals and other facilities situated at the various locations indicated in paragraph 2.1 of this Order, in so far as each is wholly or substantially demarcated from other land by walls, gates, fences, barriers, hedges, bodies of water or other man-made or natural boundary features;
- 1.2 the “**Access Roads**” means those roads (or parts of the roads) including but not limited to the verges, central reservations, turning areas and junctions which provide access to and from each of the Terminals, the location and extent of which are more particularly shown for identification purposes coloured light blue with pink lettering (access routes) and blue (approach roads) in the plans exhibited hereto at Annex H.

Injunction

2. With immediate effect and until trial, unless varied, discharged or extended by further order, the Defendants and each of them are forbidden from doing the following:

2.1 Entering or remaining upon any part of the following Terminals without the Claimants’ permission:

- 2.1.1 the Terminal, including the two jetties, informally known as the '**Grays Terminal**' situated at Askews Farm Lane, London Road, Grays, RM17 6YU, the general location and extent of which is shown outlined in red, green and pink (with accompanying jetties and related structures shown in the plan exhibited hereto in Annex A;
- 2.1.2 the Terminal informally known as the '**Bramhall Terminal**' situated at Bramhall, Stockport, SK12 1BE , the general location and extent of which is shown outlined in red in the plan exhibited hereto at Annex B;
- 2.1.3 the Terminal, including the two jetties, informally known as the '**Seal Sands Terminal**' situated at the PD Teesport Limited Seal Sands Estate, Stockton-on-Tees, Middlesborough, TS2 1UB , the general location and extent of which is shown outlined

in red, green and blue in the plan exhibited hereto at Annex C;

2.1.4 the Terminal informally known as the '**Misterton Terminal**' situated at Stockwith Road, Doncaster, DN10 4JG , the general location and extent of which is shown outlined in red in the plan exhibited hereto at Annex D;

2.1.5 the Terminal informally known as the '**Hallen Terminal**' situated at Hallen Road, Hallen, Bristol, BS10 7RH, the general location and extent of which is shown outlined in red in the plan exhibited hereto at Annex E;

2.1.6 the Terminal informally known as the '**Thetford Terminal**' situated at Mundford Road, Thetford, IP24 1HU, the general location and extent of which is shown outlined in red in the plan exhibited hereto at Annex F; and

2.1.7 the Terminal informally known as the '**Saffron Waldon Terminal**' situated at Ashdon Road to the north and Radwinter Road to the south, in Saffron Walden, CB10 2JZ, the general location and extent of which is shown outlined in red in the plan exhibited hereto at Annex G.

2.2 Damaging the whole or any part of the Terminals;

2.3 Climbing onto tankers on any part of the Access Roads;

2.4 **TUNNELLING ETC:** Tunnelling or undermining or digging or doing other works on above or beneath or beside any part of those Access Roads BUT PROVIDED that nothing in this paragraph shall prevent the normal conduct of roadworks and the like by statutory undertakers and highways authorities and any other person in the normal course of his or her business;

2.5 **FIRE SAFETY ZONE:** causing or appearing to cause a risk of ignition or explosion anywhere in proximity to tankers or the Terminals;

2.6 Affixing themselves to another person or to any vehicle or other object on the Terminals or Access Roads;

- 2.7 Abandoning any vehicle or deflating the tyres on any vehicle on any of the Access Roads;
- 2.8 Causing, assisting, encouraging or permitting any other person to do any act prohibited by paragraphs 2.1 to 2.7 above.

Service

3. Pursuant to CPR r.6.15, r.6.27 and r. 81.4(2)(c) and (d), the Claimants shall take the following steps by way of service of the Amended Claim Form, the Application, the Witness Statements with their exhibits (as filed) and this Order (the “**Claim Documents**”) upon the First and Second Defendants:

3.1 The Claimants shall affix plastic containers in at least two conspicuous locations at the main entrance to each Terminal, in which shall be placed

3.1.1 copies of the Claim Documents; and

3.1.2 a sheet that states that this Order is to be reconsidered at a hearing on a date to be listed between 11 January 2023 and 21 January 2023 and that the Claimants’ solicitors can be contacted for details as to the time and date of that hearing.

3.2 The Claimants shall position signs which are approximately 1.5m x 1m in size at each main entrance of each of the Terminals, advertising the existence of this Order and of the injunction prohibiting entry to the Terminal without the consent of the Claimants.

3.3 The Claimants shall position 4 (four) signs, at conspicuous locations along each of:

3.3.1 (in relation to the Grays Terminal) Askews Farm Lane, Wouldham Road, Devonshire Road and Elizabeth Road;

3.3.2 (in relation to the Bramhall Terminal) Ashmead Lane;

- 3.3.3 (in relation to the Seal Sands Terminal) the unnamed road which provides access to the PD Teesport Limited Seal Sands Estate;
- 3.3.4 (in relation to the Misterton Terminal) Stockwith Road and Fox Covert Lane;
- 3.3.5 (in relation to the Hallen Terminal) Hallen Road and Avonmouth Way;
- 3.3.6 (in relation to the Thetford Terminal) Mundford Road and Telford Way

which are approximately 1.5m x 1m in size, advertising the existence of this Order and the prohibitions upon obstructing the Access Roads or preventing the free and safe flow of traffic (together with a map of the relevant site of at least A2 size identifying the extent of the Access Roads relating to that particular Terminal).

3.4 The Claimants shall upload electronic copies of the Claim Documents (in PDF form) to an electronic folder on the “Dropbox” website and shall include the link to the Dropbox folder and the Claimants’ solicitors’ contact details on each of the aforesaid signs.

3.5 The Claimants shall email a copy of this Order to the email addresses set out in the Appendix hereto.

- 4. The taking of such steps set out at paragraph 3 shall be good and sufficient service of this Order, and of the Claim Documents, upon the First and Second Defendants and each of them.
- 5. The Court will provide sealed copies of this Order to the Claimants’ solicitors for service (whose details are set out below).
- 6. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3 — BUT provided for the avoidance of doubt that steps which have already been taken pursuant to the Order of 8 April 2022 need not be repeated,

the intent of this order in this regard being merely that the Claim Documents served by the taking of such steps should be updated by (a) inclusion of or as the case may be reference to this order (but without need to repeat the annexes which are unchanged since the Order of 8 April 2022) and (b) inclusion of the sheet mentioned in para 3.1.2 above.

Further directions

7. The Claimants shall provide to any named defendant copies of the documents filed as at the date of this Order, further evidence or other documents filed in these proceedings upon request from time to time at an email address provided to the Claimants and place all such documents online to be publicly accessible.
8. The Claimants shall identify and name defendants whose names become known to it; and shall apply to add them as named defendants to this Order as soon as reasonably practicable.
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 any such application must be on notice to the Claimants' solicitors by email at exolum.service@tyrlaw.co.uk.
10. Any person applying to vary or discharge this order must provide their full name and address, and address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.
11. The Claimants have liberty to apply to extend, vary or discharge this Order, or for further directions.
12. No acknowledgment of service, admission or defence is required by any party until further so ordered.
13. Costs reserved.

Communications with the Claimants

14. The Claimants' solicitors and their contact details are:

Tyr
2 The Embankment
Sovereign Street
Leeds
LS1 4BA
(Ref: NPB/DJC/2657)
E: exolum.service@tyrlaw.co.uk
T: 0113 512 1050

Dated: 29 April 2022

ANNEX A
GRAYS



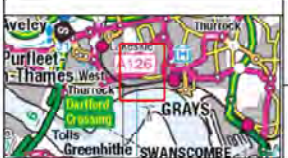
GRAYS, SITE PLAN

Main site

Jetties

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OVERVIEW WINDOW



SCALE: 1:5,500 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
GRAYS



Legend

- EX441462
 - AGI
 - Jetty 1
 - Jetty 2
- Nearest Postcode: RM17 5XR
Latitude & Longitude: 51.483471 , 0.30661454
Site centre coordinates: 560,169 - 178,040



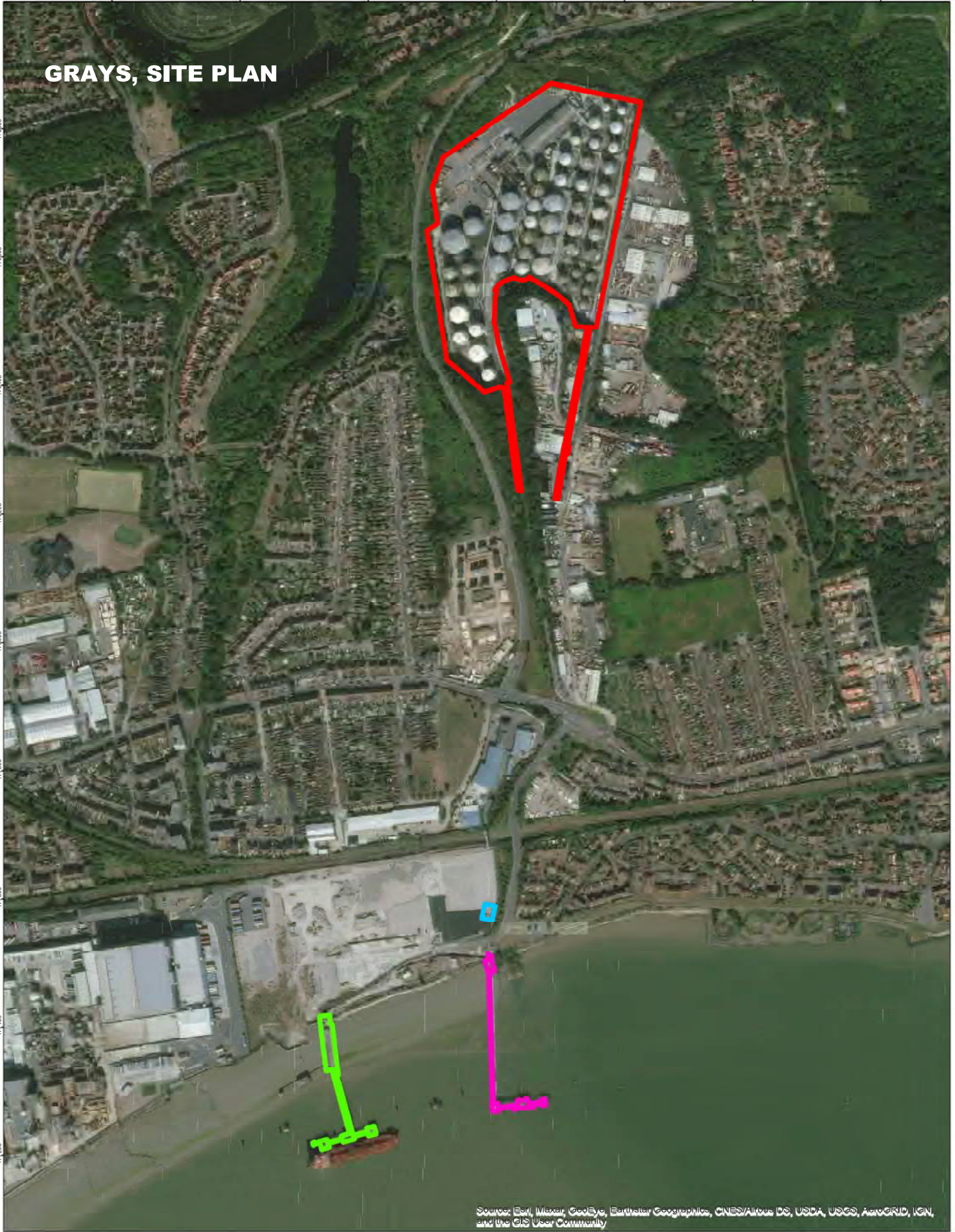
FISHER GERMAN
The Estates Office, Norman Court
Ashby de la Zouch,
Leicestershire, LE65 2UZ
Telephone 0845 070 1243

DRAWING NO:
EXOLUM-2022-04-AH-
PLAN 1-V2

F/1/483

GRAYS, SITE PLAN

179500
179400
179300
179200
179100
179000
178900
178800
178700
178600
178500
178400
178300



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

OVERVIEW WINDOW

SCALE: 1:5,500 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
GRAYS

CLIENT:

Legend

- EX441462
- AGI
- Jetty 1
- Jetty 2

Nearest Postcode: RM17 5XR

Latitude & Longitude: 51.483471 , 0.30661454

Site centre coordinates: 560,169 - 178,040



The Estates Office, Norman Court
Ashby de la Zouch,
Leicestershire, LE65 2UZ
Telephone 0845 070 1243

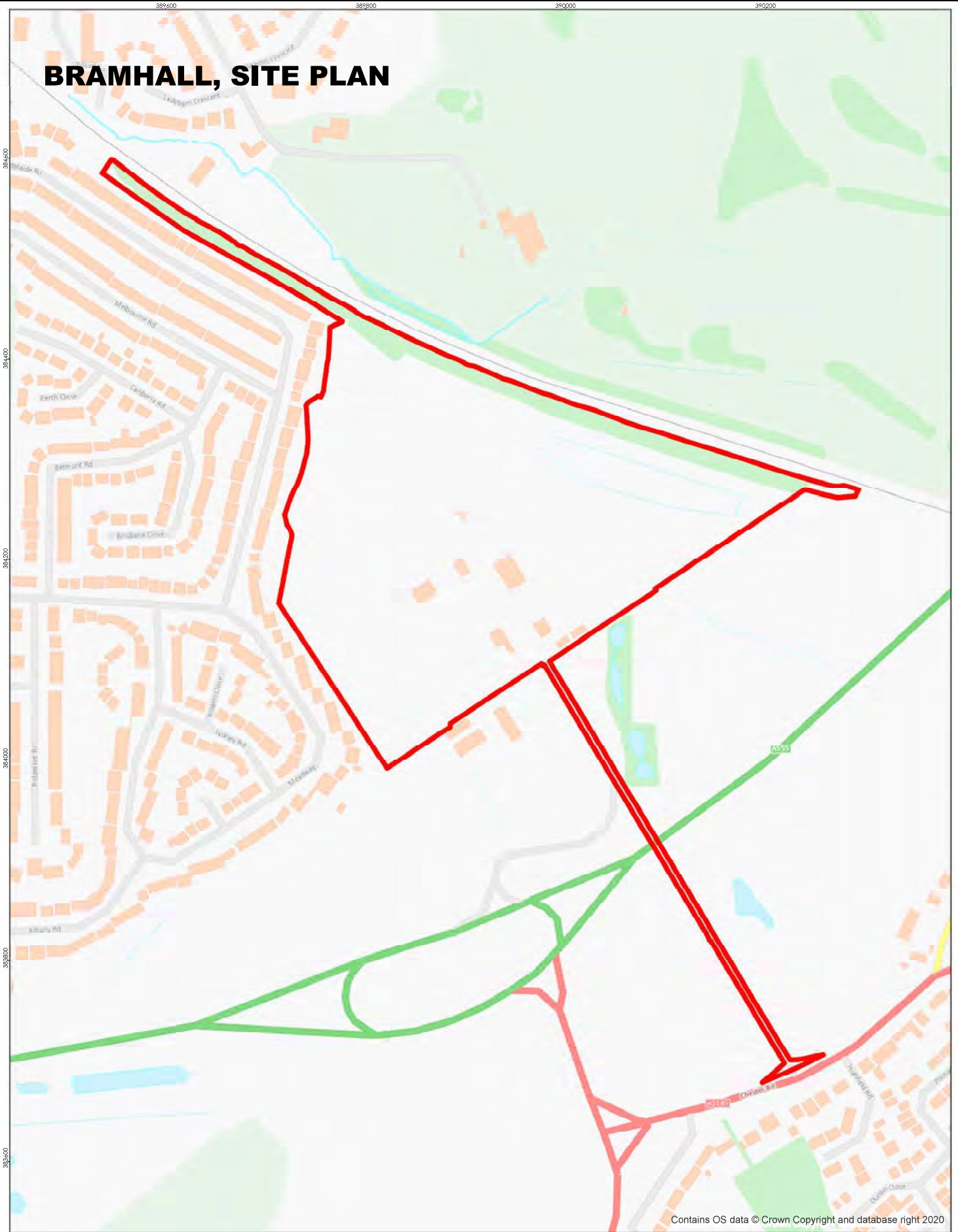
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EXOLUM-2022-04-AH-4
PLAN 2-V2

F11/484

ANNEX B

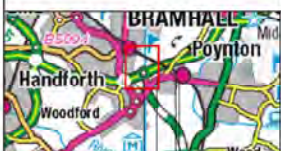
BRAMHALL

BRAMHALL, SITE PLAN



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OVERVIEW WINDOW



SCALE: 1:3,500 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
BRAMHALL

CLIENT:



Legend

 MAN147041

Nearest Postcode: SK7 2DG
Latitude & Longitude: 53.354036, -2.1529758
Site centre coordinates: 389,915 - 384,139



DRAWING NO:
EXOLUM-2022-04-A
BRAMHALL-PLAN 1-

F/1/486

EXHIBIT FL1 - 230

BRAMHALL, SITE PLAN

384600
384400
384200
384000
383800
383600
383400



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

OVERVIEW WINDOW

SCALE: 1:3,500 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
BRAMHALL

CLIENT:

Legend

MAN147041

Nearest Postcode: SK7 2DG

Latitude & Longitude: 53.354036, -2.1529758

Site centre coordinates: 389,915 - 384,139



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BRAMHALL-PLAN 2-

F/1/487

ANNEX C

SEAL SANDS

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525400

525200

525000

524800

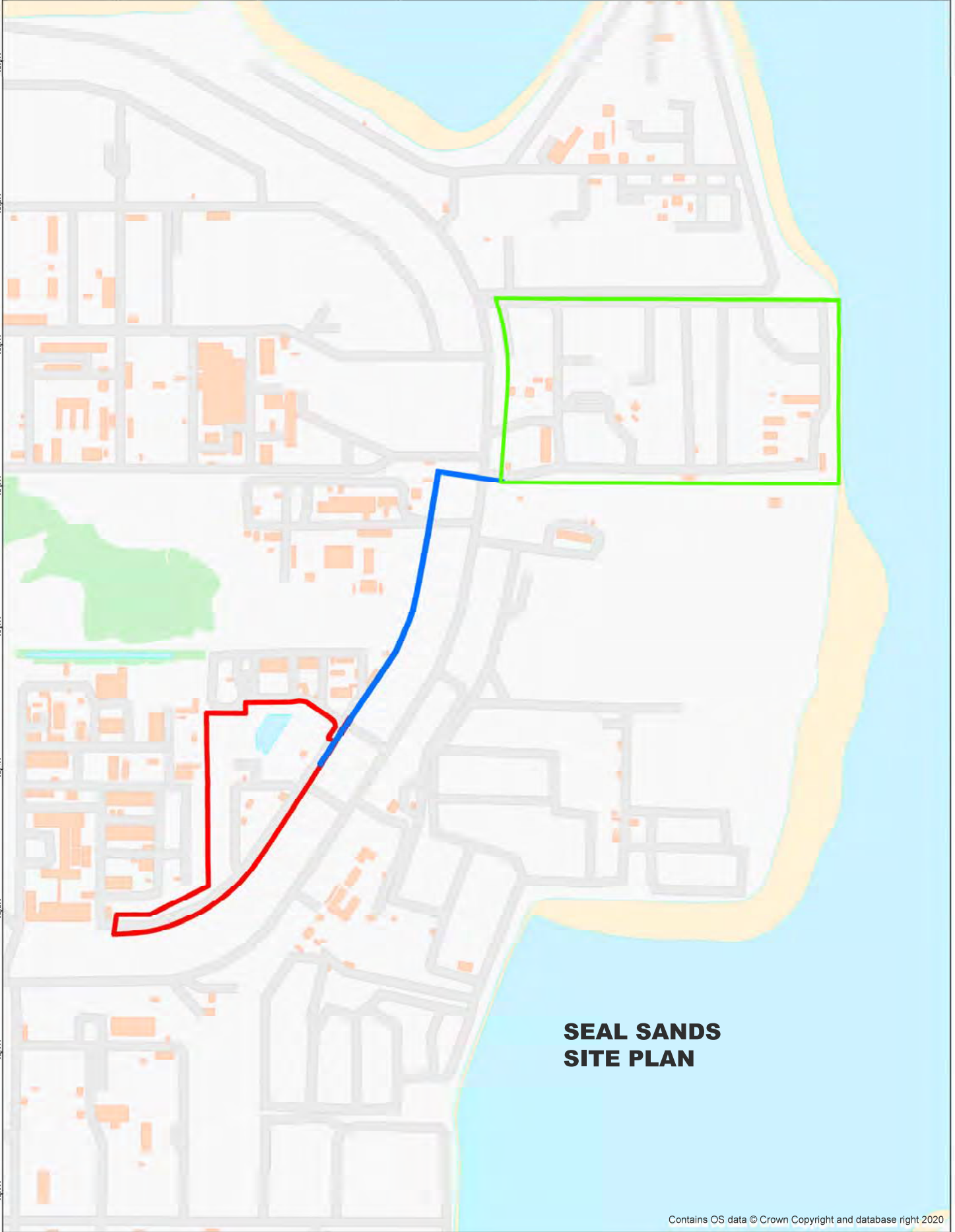
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524400

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524000

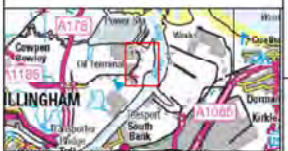
523800



SEAL SANDS SITE PLAN

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OVERVIEW WINDOW



SCALE: 1:5,000 @ A3
DATE: 06/04/2022

TITLE:
LOCATION PLAN
SEAL SANDS

CLIENT:



Legend

- CE6177
- CE224689
- CE68012

Nearest Postcode: TS2 1UB
Latitude & Longitude: 54.614154, -1.1680341
Site centre coordinates: 453,910 - 524,616



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SEAL SANDS-PLAN 1

F/1/489



SEAL SANDS SITE PLAN

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

OVERVIEW WINDOW

SCALE: 1:5,000 @ A3
DATE: 06/04/2022

TITLE:
LOCATION PLAN
SEAL SANDS

CLIENT:

Legend

- CE6177
- CE224689
- CE68012

Nearest Postcode: TS2 1UB
Latitude & Longitude: 54.614154, -1.1680341
Site centre coordinates: 453,910 - 524,616

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SEAL SANDS-PLAN 2

F/1/490

ANNEX D

MISTERTON



MISTERTON SITE PLAN

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OVERVIEW WINDOW

SCALE: 1:4,000 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
MISTERTON

CLIENT:

Legend

NT471286

Nearest Postcode:	DN10 4JG
Latitude & Longitude:	53.430882, -0.83872023
Site centre coordinates:	477,217 - 393,318



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DRAWING NO:
EXOLUM-2022-04-A
MISTERTON-PLAN 1-

F/1/492



MISTERTON SITE PLAN

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

OVERVIEW WINDOW

SCALE: 1:4,000 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
MISTERTON

CLIENT:

Legend

NT471286

Nearest Postcode: DN10 4JG

Latitude & Longitude: 53.430882, -0.83872023

Site centre coordinates: 477,217 - 393,318



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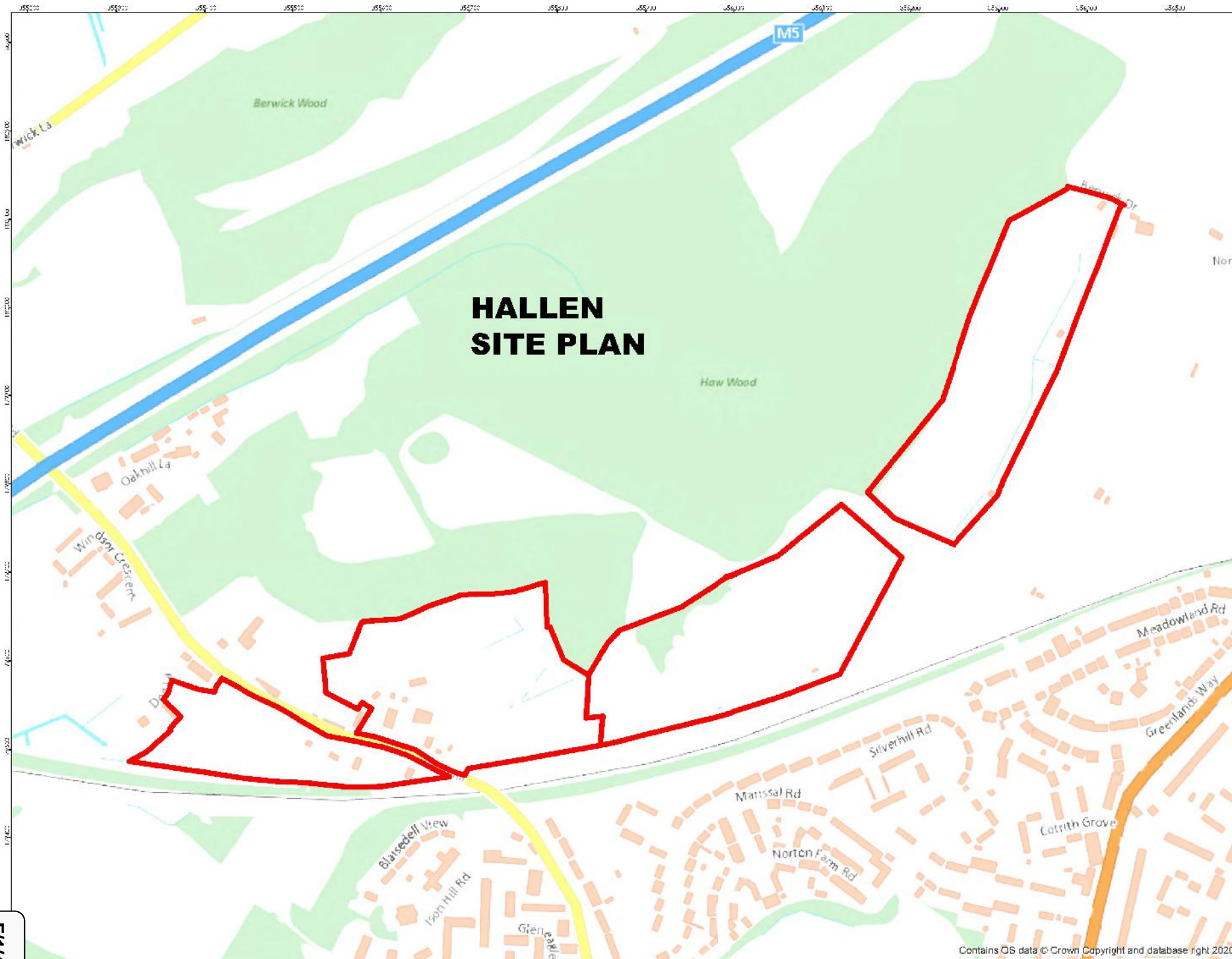
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Leicestershire, LE65 2UZ
Telephone 0845 070 1245

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EXOLUM-2022-04-A
MISTERTON-PLAN 2-

F/1/493

ANNEX E

HALLEN



HALLEN SITE PLAN



OVERVIEW WINDOW

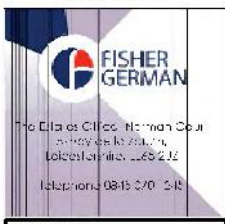
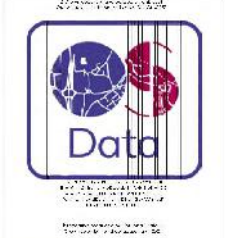


Legend
 BNS0210

Nearest Postcode:
 BS10 7RH
 Latitude & Longitude:
 51.513567, -2.6366939
 Site centre coordinates:
 355,676 - 179,797

CLIENT:

TITLE:
 LOCATION PLAN
 HALLEN
 SCALE: 1:4,000 @ A3
 DATE: 05/04/2022



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 HALLEN-PLAN 1-V2

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F/11/495



HALLEN SITE PLAN



OVERVIEW WINDOW

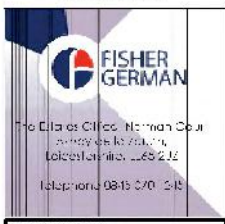


Legend
 BNS02110

Neares Postcode:
 3310 7RH
 Latitude & Longitude:
 51.513567 - 2.6366939
 Site centre coordinates:
 355,676 - 179,797

CLIENT:

TITLE:
 LOCATION PLAN
 HALLEN
 SCALE: 1:4,000 @ A3
 DATE: 05/04/2022



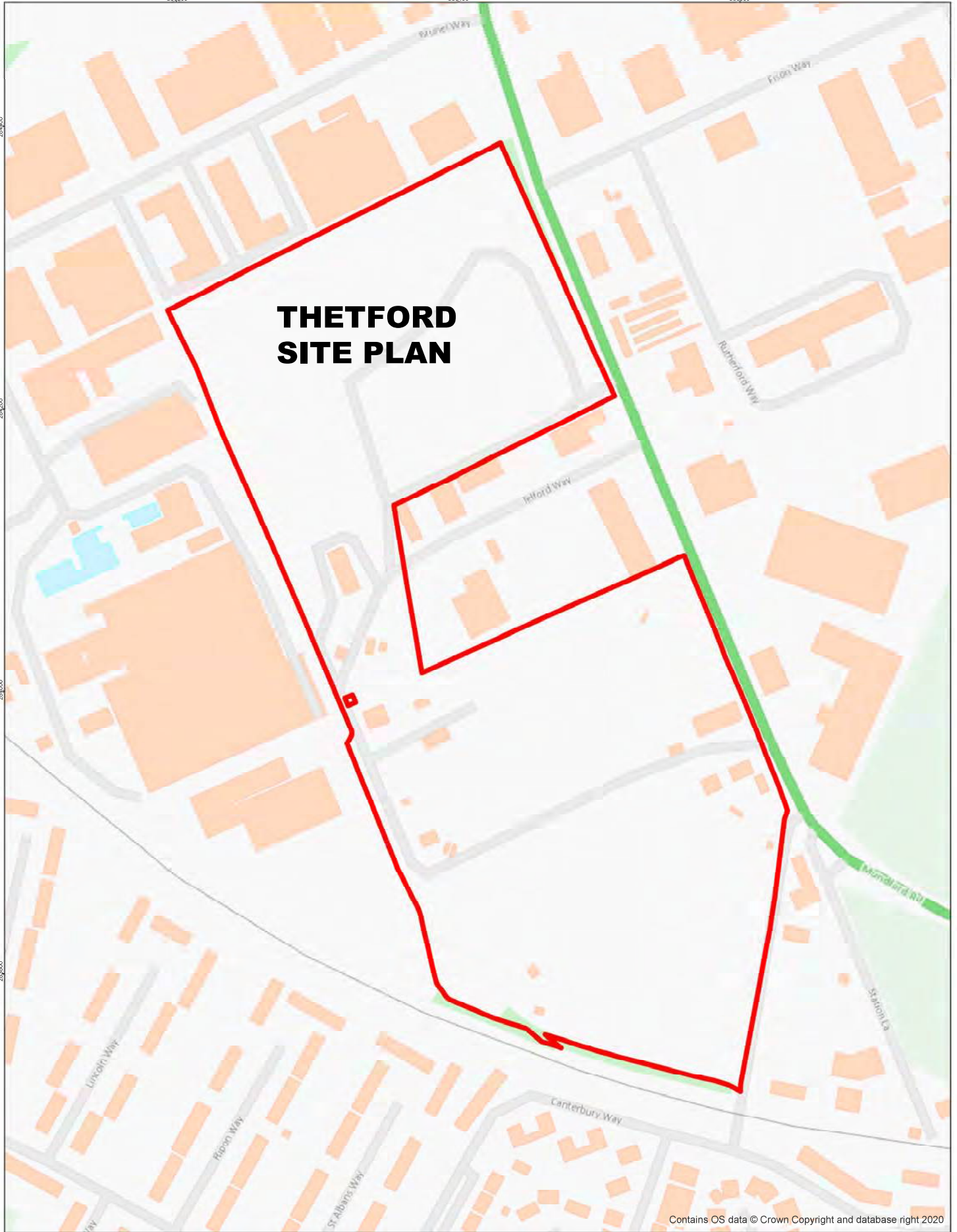
DRAWING NO:
 EXOLUM-2022-04-AH-
 HALLEN-PLAN 2-V2

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

F/1/1496

ANNEX F

THETFORD



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OVERVIEW WINDOW

SCALE: 1:2,500 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
THETFORD

CLIENT:

Legend

NK379278

Nearest Postcode:	IP24 1HU
Latitude & Longitude:	52.422043 , 0.74054752
Site centre coordinates:	586,414 - 284,052



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OVERVIEW WINDOW

SCALE: 1:2,500 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
THETFORD

CLIENT:

Legend

NK379278

Nearest Postcode: IP24 1HU
Latitude & Longitude: 52.422043 , 0.74054752
Site centre coordinates: 586,414 - 284,052



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Asby de la Zouch,
Leicestershire, LE45 2UZ
Telephone 0845 070 1245

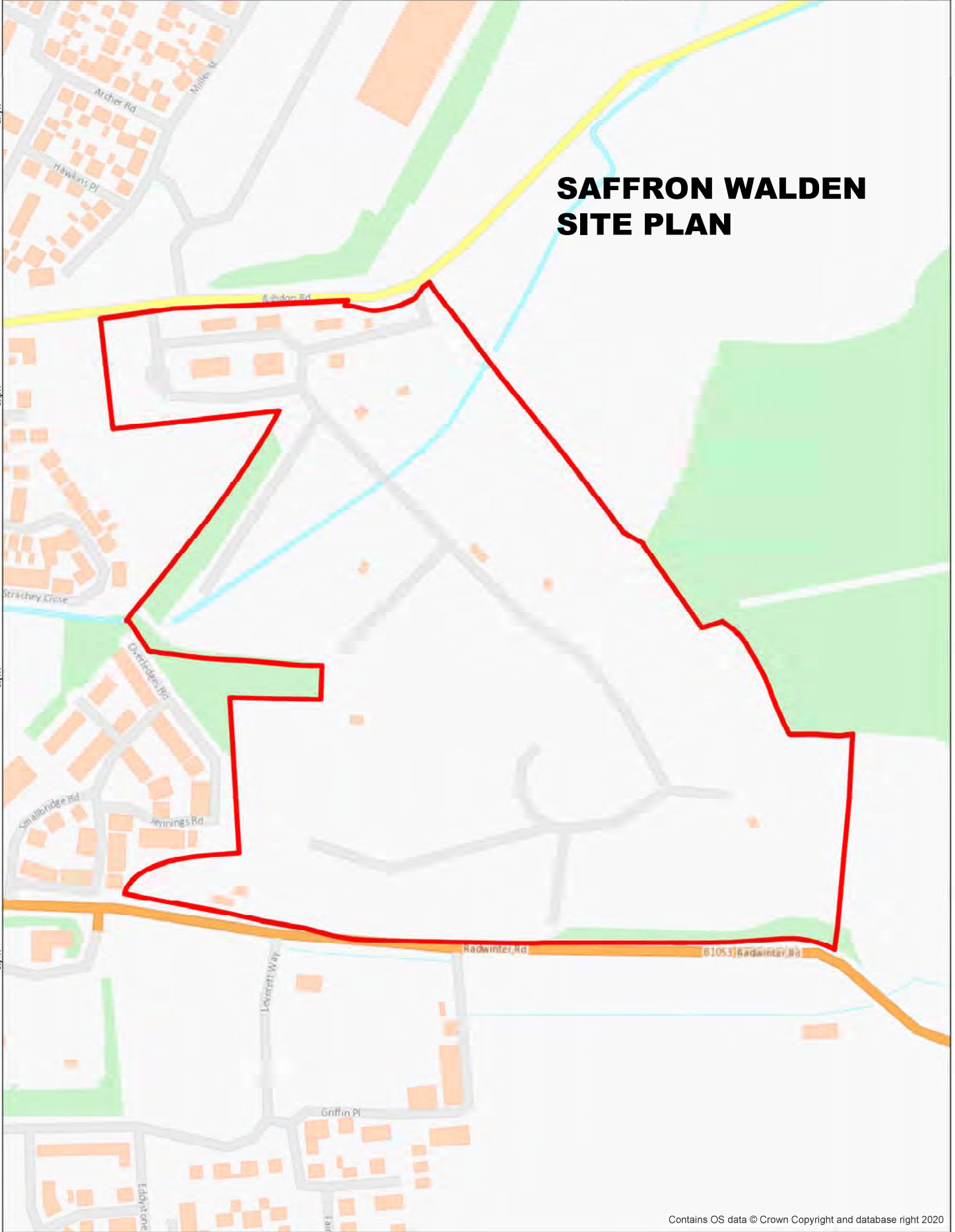
DRAWING NO:
EXOLUM-2022-04-A
THETFORD-PLAN 2-V

F/1/499

ANNEX G

~~SAFFRON WALDEN~~

SAFFRON WALDEN SITE PLAN



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OVERVIEW WINDOW

SCALE: 1:2,500 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
SAFFRON WALDEN

CLIENT:

Legend

- EX862786

Nearest Postcode: CB10 2JZ
Latitude & Longitude: 52.024422, 0.26493470
Site centre coordinates: 555,496 - 238,644



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SAFFRON WALDEN-P

F/1/501



SAFFRON WALDEN SITE PLAN

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OVERVIEW WINDOW

SCALE: 1:2,500 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
SAFFRON WALDEN

CLIENT:

Legend

EX862786

Nearest Postcode: CB10 2JZ

Latitude & Longitude: 52.024422, 0.26493470

Site centre coordinates: 555,496 - 238,644



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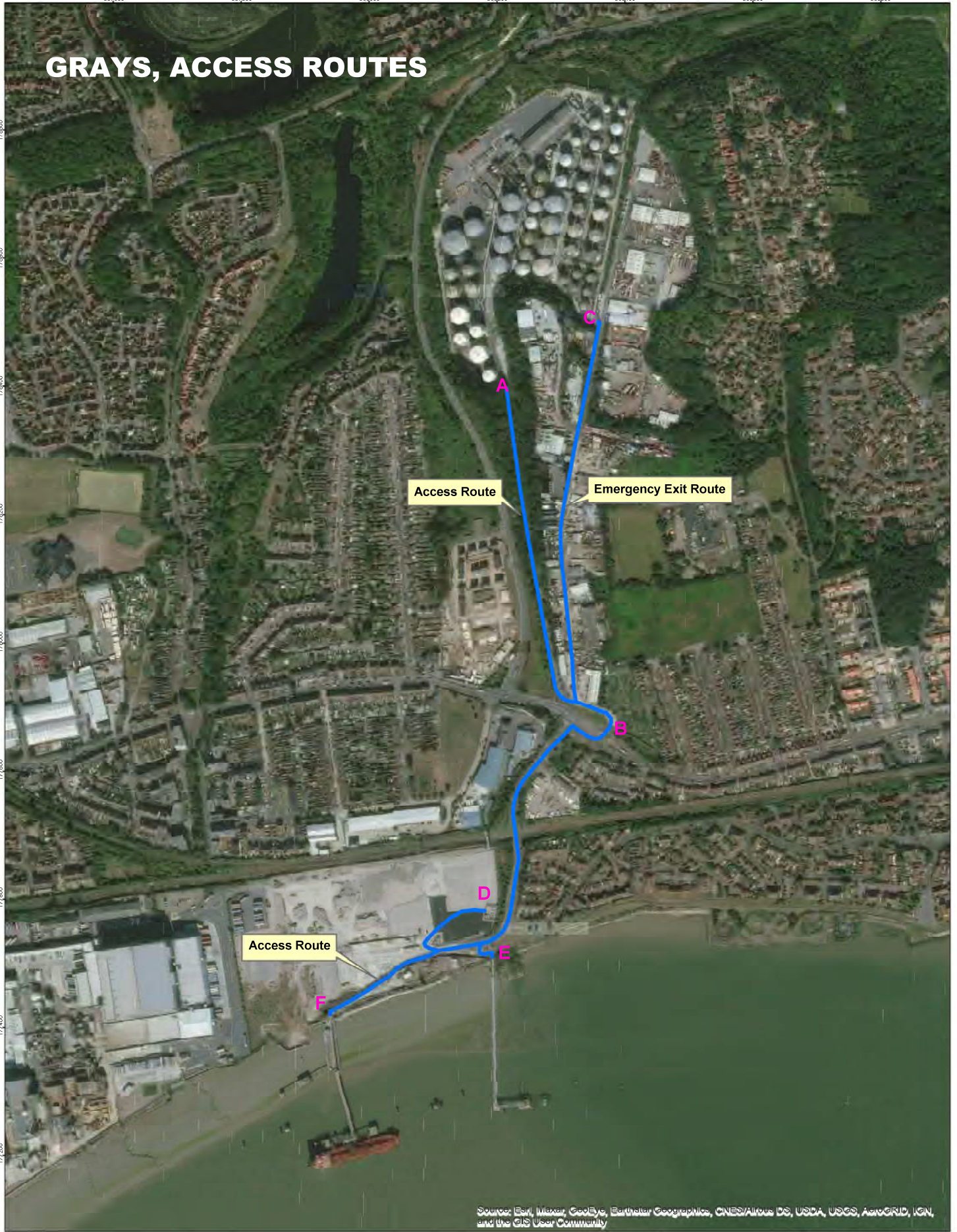
DRAWING NO:
EXOLUM-2022-04-A
SAFFRON WALDEN-F

F/1/502

ANNEX H
5779GGFC58G

GRAYS, ACCESS ROUTES

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179400
179300
179200
179100
179000
178900
178800
178700
178600
178500
178400
178300



Sources: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

OVERVIEW WINDOW

SCALE: 1:5,500 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
GRAYS

CLIENT:

Legend

— Access Route

Nearest Postcode: RM17 5XR

Latitude & Longitude: 51.483471 , 0.30661454

Site centre coordinates: 560,169 - 178,040



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DRAWING NO:
EXOLUM-2022-04-AH-4
PLAN 3-V1

F/1/504

GRAYS, APPROACH ROADS



BRAMHALL, ACCESS ROUTES

384600
384400
384200
384000
383800
383600



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

OVERVIEW WINDOW

SCALE: 1:3,500 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
BRAMHALL

CLIENT:

Legend

— Access Route

Nearest Postcode: SK7 2DG
Latitude & Longitude: 53.354036, -2.1529758
Site centre coordinates: 389,915 - 384,139



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BRAMHALL-PLAN 4

F/1/506

BRAMHALL APPROACH ROADS





SEAL SANDS ACCESS ROUTES

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

OVERVIEW WINDOW

SCALE: 1:5,000 @ A3
DATE: 06/04/2022

TITLE:
LOCATION PLAN
SEAL SANDS

CLIENT:

Legend

- Access Route

Nearest Postcode: TS2 1UB
Latitude & Longitude: 54.614154, -1.1680341
Site centre coordinates: 453,910 - 524,616

Data

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SEAL SANDS-PLAN 3

F/1/508



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

OVERVIEW WINDOW

SCALE: 1:15,000 @ A3
DATE: 06/04/2022

TITLE:
LOCATION PLAN
SEAL SANDS

CLIENT:

Legend

- Access Route

Nearest Postcode:	TS2 1UB
Latitude & Longitude:	54.614154, -1.1680341
Site centre coordinates:	452,312 - 524,361



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DRAWING NO:
EXOLUM-2022-04-A
SEAL SANDS-PLAN 4

F/1/509



MISTERTON ACCESS ROUTES

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

OVERVIEW WINDOW

SCALE: 1:4,000 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
MISTERTON

CLIENT:

Legend

- Access Route

Nearest Postcode: DN10 4JG
Latitude & Longitude: 53.430882, -0.83872023
Site centre coordinates: 477,217 - 393,318



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EXOLUM-2022-04-A
MISTERTON-PLAN 3-

F/1/510



Walkeringham

A161

A161

Stc

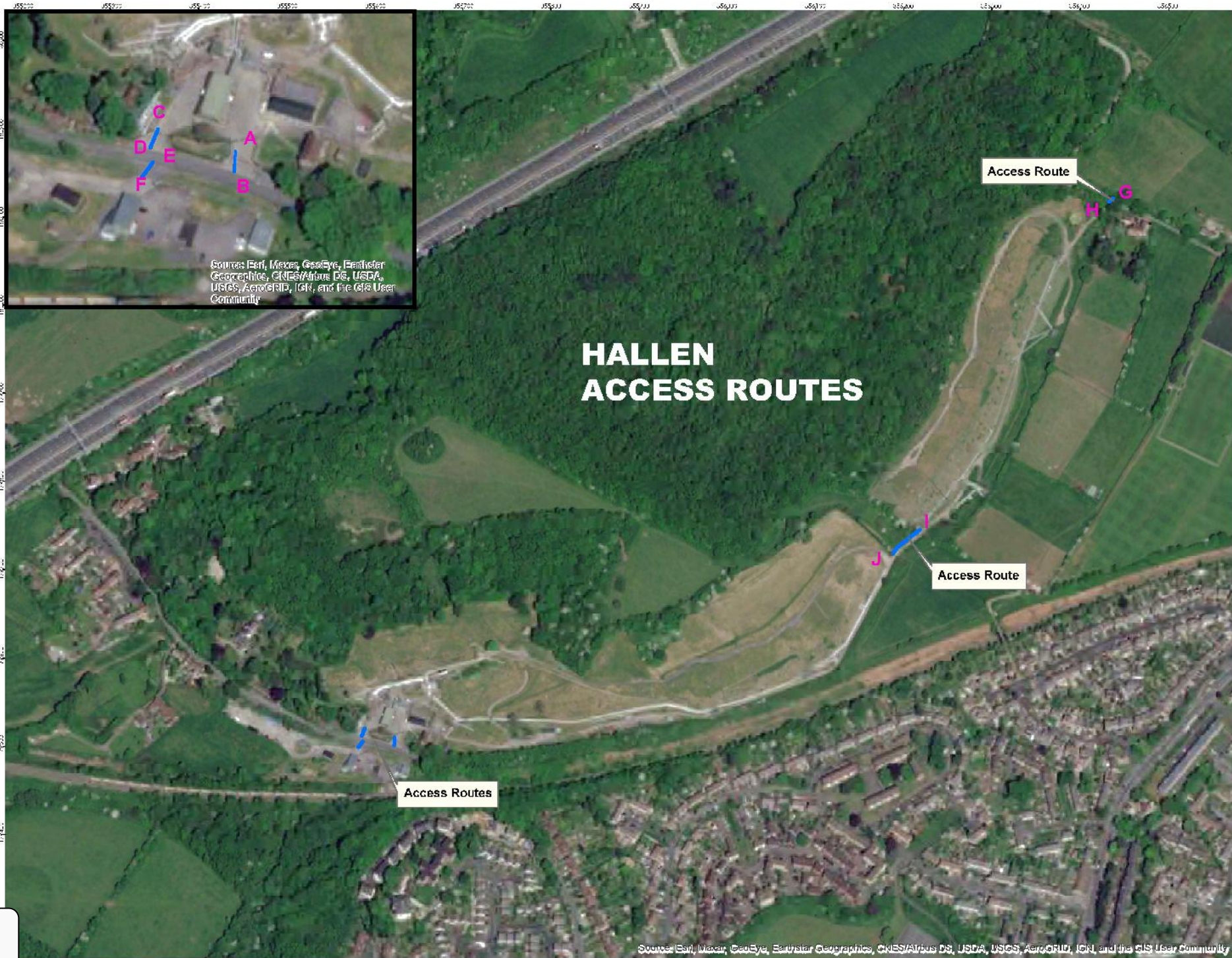
River Itton

MISTERTON APPROACH ROADS

Image © 2022 Getmapping plc

F/1/511

EXHIBIT FL1 - 275



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

HALLEN ACCESS ROUTES



Nearest Postcode:
3510 7RH
Latitude & Longitude:
51.513567, -2.6366939
Site centre coordinates:
355,676 - 179,797



TITLE:
LOCATION PLAN
HALLEN
SCALE: 1:4,000 @ A3
DATE: 05/04/2022



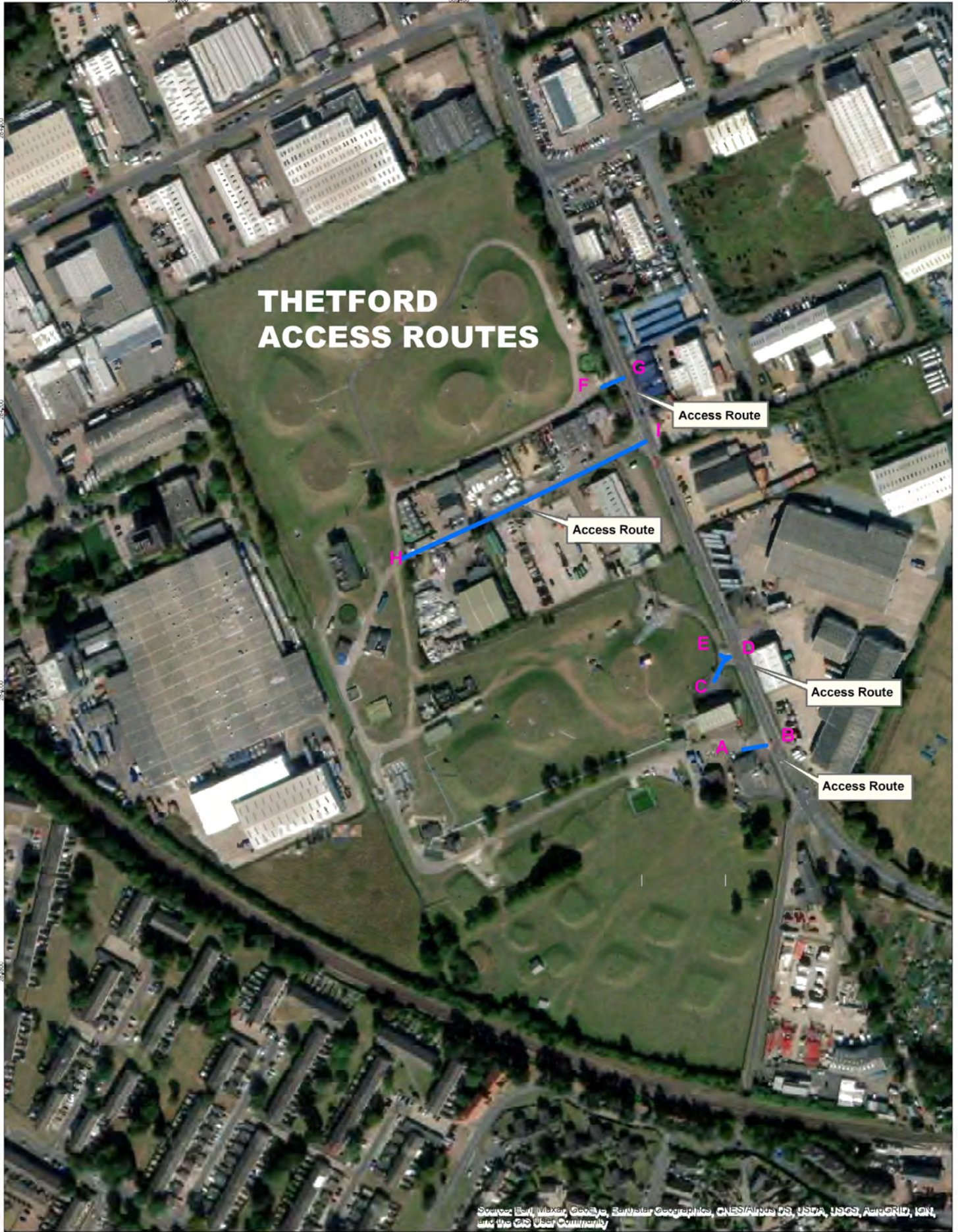
DRAWING NO:
EXOLUM-2022-04-AH-
HALLEN-PLAN 3-V2

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

F/11/512

HALLEN APPROACH ROADS





THETFORD ACCESS ROUTES

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

OVERVIEW WINDOW

SCALE: 1:2,500 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
THETFORD

CLIENT:

Legend

- Access Routes

Nearest Postcode:	IP24 1HU
Latitude & Longitude:	52.422043 , 0.74054752
Site centre coordinates:	586,414 - 284,052



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Telephone 0845 070 1245

DRAWING NO:
EXOLUM-2022-04-A
THETFORD-PLAN 3-V

F/1/514



**THETFORD
APPROACH ROADS**



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

OVERVIEW WINDOW

SCALE: 1:2,500 @ A3
DATE: 05/04/2022

TITLE:
LOCATION PLAN
SAFFRON WALDEN

CLIENT:

Legend

- Access Route

Nearest Postcode:	CB10 2JZ
Latitude & Longitude:	52.024422 , 0.26493470
Site centre coordinates:	555,496 - 238,644



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DRAWING NO:
EXOLUM-2022-04-A
SAFFRON WALDEN-F

F/1/516

ANNEX I

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- enquiries@extinctionrebellion.uk
- eoexrtnt@protonmail.com
- eventsxr@gmail.com
- integration@rebellion.earth
- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- press@extinctionrebellion.uk
- press@extinctionrebellion.uk
- rebelrings@rebellion.earth
- RelationshipsXRUK@protonmail.com
- Ring2021@protonmail.com
- socialmedia@extinctionrebellion.uk
- support@xrnorth.org
- talksandtraining.xrbristol@protonmail.com
- talksandtrainings.scotland@extinctionrebellion.uk
- xr.connectingcommunities@gmail.com
- xr.eastengland@protonmail.com
- xr.mandates@gmail.com
- xr.regenerativeculture@gmail.com
- xr.regional.sw@protonmail.com
- xr-action@protonmail.com
- xraffinitysupport@protonmail.com
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