

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

**Before: Mrs Justice May
On: 26 July 2024**

BETWEEN:

NATIONAL HIGHWAYS LIMITED

- and -



**PERSONS UNKNOWN CAUSING THE BLOCKING OF, ENDANGERING, OR
PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25 MOTORWAY, A3,
A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY, A1(M), A3,
A12, A13, A21, A23, A30, A120 A414, A1081 AND A3113 TRUNK ROADS AND
THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40 MOTORWAYS FOR THE
PURPOSE OF PROTESTING**

Defendants

ORDER

PENAL NOTICE

**IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER
YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED,
FINED OR HAVE YOUR 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.**

**A Defendant who is an individual who is ordered not to do something must not do it
himself/herself/themselves or in any other way. He/she/they must not do it through others
acting on his/her/their behalf or on his/her/their instructions or with his/her/their
encouragement.**

FURTHER TO the Order made by Mrs Justice Collins Rice dated 26 April 2024 ("**the Rice Order**")

AND UPON the Claimant's application by Application Notice dated 24 July 2024 ("**the Application**")

AND UPON Mrs Justice May reading the Third Witness Statement and exhibits of Sean Martell dated 25 July 2024

AND UPON the Court being satisfied that based on the evidence before the Court that there is a threat such that the Rice Order should be varied to cover certain additional parts of the Strategic Road Network ("**the Additional Parts**") as defined at paragraph 1.b. of this Order by reference to the plans at Appendix 4 to this Order

AND UPON the Claimant re-confirming that this Order is not intended to prohibit lawful protest which does not block or endanger, or prevent the free flow of traffic on the Roads and Additional Parts as defined in paragraph 1 of this Order

AND UPON the Court being satisfied, pursuant to CPR PD23A paragraph 3(1) and (4), that given the exceptional urgency of the Application, the Claimant do have the permission of the Court to have the Application heard without service of the Application Notice

AND UPON the Police Representative Assistant Chief Constable Mark Williams consenting on behalf of all the Chief Constables for those forces listed in Schedule 2 that the Third Party Disclosure provisions at paragraph 7 of this Order also apply to the Additional Parts as well as the Roads, which consent has been evidenced to the Court

AND UPON HEARING John Litton KC and Michael Feaney for the Claimant (the Defendants not attending nor making any submissions in writing or otherwise) at a hearing on 26 July 2024.

IT IS ORDERED THAT:

Definitions

1. In this Order, the following defined terms shall apply:
 - a. "**Defendants**" means all defendants.
 - b. "**the Additional Parts**" shall mean all of the following (shown in dark blue on the plans at Appendix 4 to this Order):
 - i. the M1 (from Junction 8 to Junction 11);

- ii. the A1081 (from Junction 10 on the M1 to the start of the London Road slip road);
 - iii. the M11 (from Junction 7 to Junction 10 and including the M11 A1301 junction); and
 - iv. the A120 (from Junction 8 of the M11 to the B1256 (adjacent to Huntingfields House)).
- c. **“the Roads”** shall mean all of the following:
- i. The M25, meaning the London Orbital Motorway and shown in red on the plans at Appendix 1 annexed to this Order.
 - ii. The A2, A20, A2070, M2 and M20, meaning the roads shown in blue and green on the plans at Appendix 2 annexed to this Order.
 - iii. The A1(M) (Junction 1 to Junction 6), A1 (from A1M to Rowley Lane and from Fiveways Corner roundabout to Hilltop Gardens), M11 (Junction 4 to Junction 7), A12 (M25 Junction 28 to A12 Junction 12), A1023 (Brook Street) (from M25 Junction 28 roundabout to Brook Street Shell Petrol Station access), A13 (M25 Junction 30 to A1089), A13 (from junction with A1306 for Wennington to M25 Junction 30), A1089 (from junction with A13 to Port of Tilbury entrance), M26 (whole motorway from M25 to M20), A21 (M25 to B2042), A23 (M23 to Star Shaw), M23 (Junction 7 to Junction 10 (including M23 Gatwick Spur)), A23 (between North and South Terminal Roundabouts), A3 (A309 to B2039 Ripley Junction), M3 (Junction 1 to Junction 4), A316 (from M3 Junction 1 to Felthamhill Brook), A30 (M25 Junction 13 to Harrow Road, Stanwell, Feltham), A3113 (M25 Junction 14 to A3044), M4 (Junction 1 to Junction 7), M4 Spur (whole of spur from M4 Junction 4 to M4 Junction 4a), M40 (Junction 7 to A40 at Fray’s River Bridge), M1 (Junction 1 to Junction 8), A405 (from M25 Junction 21A to M1 Junction 6), A1 (from Fiveways Corner roundabout to Hilltop Gardens), and A414 (M1 Junction 8 to A405), meaning the roads shown in red on the plan at Appendix 3 annexed to this Order.
 - iv. In the case of each of the Roads and the Additional Parts, the reference to the Roads and Additional Parts shall include all carriageways, hard shoulders, central reservations, motorway (including the A1(M)) verges, slip roads,

roundabouts (including those at junctions providing access to and from the Roads), gantries, traffic tunnels, traffic bridges including in the case of the M25 the Dartford Crossing and Queen Elizabeth II Bridge and other highway structures whether over, under or adjacent to the motorway/trunk road, together with all supporting infrastructure including all fences and barriers, road traffic signs, road traffic signals, road lighting, communications installations, technology systems, laybys, police observation points/park up points, and emergency refuge areas.

- d. “**Injunction Website**” means the page on the National Highways website which holds the information as to injunctions in force, which is presently at: <https://nationalhighways.co.uk/about-us/high-court-injunctions-for-motorways-and-major-a-roads/>.

Injunction in force

2. With immediate effect and until 23.59 hrs on 10 May 2025 the Defendants and each of them are forbidden from:
 - a. Blocking or endangering, or preventing the free flow of traffic on the Roads or the Additional Parts for the purposes of protesting by any means including their presence on the Roads and the Additional Parts, or affixing themselves to the Roads or the Additional Parts or any object or person, abandoning any object, erecting any structure on the Roads or the Additional Parts or otherwise causing, assisting, facilitating or encouraging any of those matters.
 - b. Causing damage to the surface of or to any apparatus on or around the Roads or the Additional Parts including by painting, damaging by fire, or affixing any structure thereto.
 - c. Entering on foot those parts of the Roads or the Additional Parts which are not authorised for access on foot, other than in cases of emergency.

Service by Alternative Method on the Defendants

3. The Court will provide sealed copies of this Order to the Claimant’s solicitors for service (whose details are set out below).
4. Pursuant to CPR r. 6.15, 6.27 and r.81.4:

- a. The Claimant shall serve this Order upon the Defendants by:
- i. Posting a direct link to this Order on the National Highways Injunctions Website at: <https://nationalhighways.co.uk/about-us/high-court-injunctions-for-motorways-and-major-a-roads/m25-high-court-injunction-proceedings/>.
 - ii. Sending a notification of the existence of this Order to the Press Association and in particular advertising the web address of the Injunction Website and a direct link to this Order.
 - iii. Publishing social media posts on the National Highways X and Facebook platforms advertising the existence of this Order and providing a link to the Injunction Website.
 - iv. Emailing a copy of this Order to:
 1. juststopoil@protonmail.com
 2. juststopoilpress@protonmail.com
 3. insulatebritainlegal@protonmail.com
 4. Ring2021@protonmail.com
 5. actions@animalrebellion.org
 6. fundraising@animalrebellion.org
 7. integration@animalrebellion.org
 8. talks@animalrebellion.org
 9. global@animalrebellion.org
 10. localgroups@animalrebellion.org
 11. media@animalrebellion.org
 12. governance@animalrebellion.org
 13. pressoffice@animalrebellion.org
 14. finance@animalrebellion.org
 15. techsupport@animalrebellion.org
 16. info@animalrising.org
 17. enquiries@extinctionrebellion.uk
 18. press@extinctionrebellion.uk
 19. fundraising@rebellion.earth
 20. volunteer@extinctionrebellion.uk
 21. scientistrebellion_uk@protonmail.com

22. scientistrebellion@protonmail.com

5. Service in accordance with paragraph 4 above shall:
 - a. Be verified by certificates of service to be filed with the Court;
 - b. Be deemed effective as at the date of service specified by the certificates of service;
 - c. Be good and sufficient service of this Order on D1 and each of them and the need for personal service is dispensed with.
6. Further, without prejudice to paragraph 4, whilst this Order is in force, the Claimant shall take all reasonably practicable steps to effect personal service of the Order upon any Defendant of whom it becomes aware is, or has been, on the Roads or the Additional Parts for the purposes of protesting and shall verify any such service with further certificates of service (where possible if persons unknown can be identified) to be filed with Court.

Third-Party Disclosure

7. Pursuant to CPR 31.17, the Chief Constables for those forces listed in Schedule 2 to this Order shall procure that the officers within their forces disclose to the Claimant:
 - a. all of the names and addresses of any person who has been arrested by one of their officers in the course of, or as a result of, protests on the Roads or the Additional Parts referred to in these proceedings; and
 - b. all arrest notes, body camera footage and/or all other photographic material relating to possible breaches of this Order.
8. Without the permission of the Court, the Claimant shall not make use of any document disclosed by virtue of paragraph 7 of this Order, other than for one or more of the following uses:
 - a. 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;
 - b. investigating, formulating, pleading and prosecuting any claim within these proceedings arising out of any alleged breach of this Order;
 - c. 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. The Chief Constables listed in Schedule 2 to this Order shall procure that the officers within their forces give the relevant person whose details are to be provided to the Claimant pursuant to paragraph 7 of this Order not less than 48 hours' notice that disclosure will be given under paragraph 7 of this Order and supply a copy of this Order or refer to an e-mail address/website or phone number provided by the Claimant to enable this Order to be provided/available for consideration.
10. Until further Order, the postal address and/or address for service of any person who is added as a Named 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.
11. The Claimant is to serve this order on the Police Representative (Assistant Chief Constable Mark Williams (Mark.Williams@npocc.police.uk), by email only by way of service upon the Chief Constables of all of the forces listed in Schedule 2 to this Order.

Further Directions

12. Unless the Court is notified that no hearing is required (as no continuation of the Order is sought), the Order will be reconsidered at a hearing on Friday 25 April 2025 at 10.30 hrs at the Royal Courts of Justice, London to determine whether there is a continued threat which justifies continuation of this Order beyond 23.59 hrs on 10 May 2025 (“**Review Hearing**”). No further application by the Claimant shall be required.
13. The Claimant has liberty to apply for this Order to be reconsidered on the papers in order to avoid unnecessary expense and use of Court time:
 - a. The Claimant's application for reconsideration on the papers must be made by 4pm on 28 March 2025.
 - b. The Claimant shall file any evidence and/or written submissions by 4pm on 28 March 2025. The Claimant shall place any document so filed on the Injunction Website, which shall constitute good service on the Defendants.
 - c. Any other party interested in the review of this Order shall file with the Court and serve on the Claimant (at the address in paragraph 18 below) any evidence and/or written submissions by 4pm on 4 April 2025.
 - d. The Claimant, if so advised, may file and serve upon the relevant party further evidence and/or written submissions in response by 4pm on 11 April 2025.

- e. The Court shall determine whether to proceed on the papers and so vacate the Review Hearing by 4pm on 16 April 2025.
14. 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 Claimant's solicitors by email to the addresses specified at paragraph 18 below 48 hours before making such application of the nature of such application and the basis for it.
15. Any person applying to vary or discharge this Order must provide their full name and address, and address for service to the Claimant and to the Court and must also apply to be joined as a Named Defendant to these proceedings at the same time.
16. The Claimant has liberty to apply to extend, vary or discharge this Order, or for further directions.

Costs

17. No order as to costs.

Communications with the Claimant

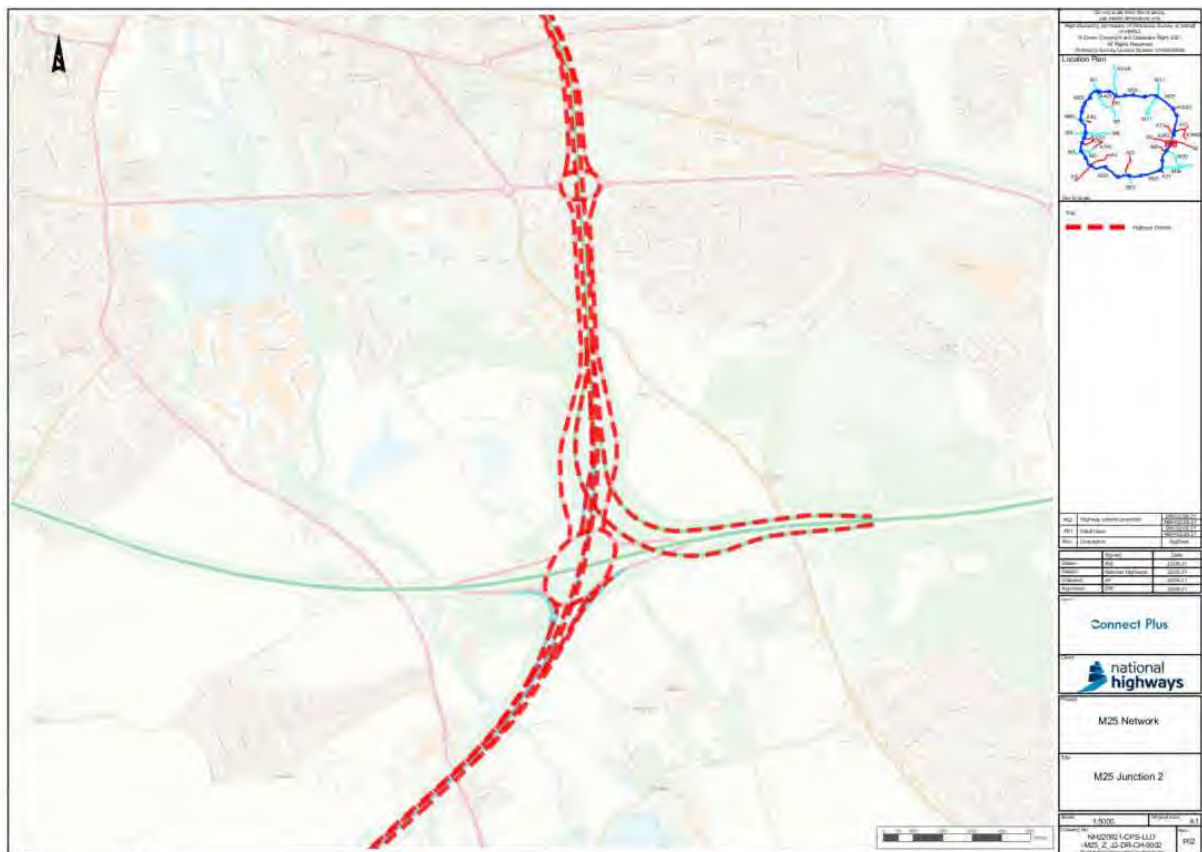
18. The Claimant's solicitors and their contact details are:

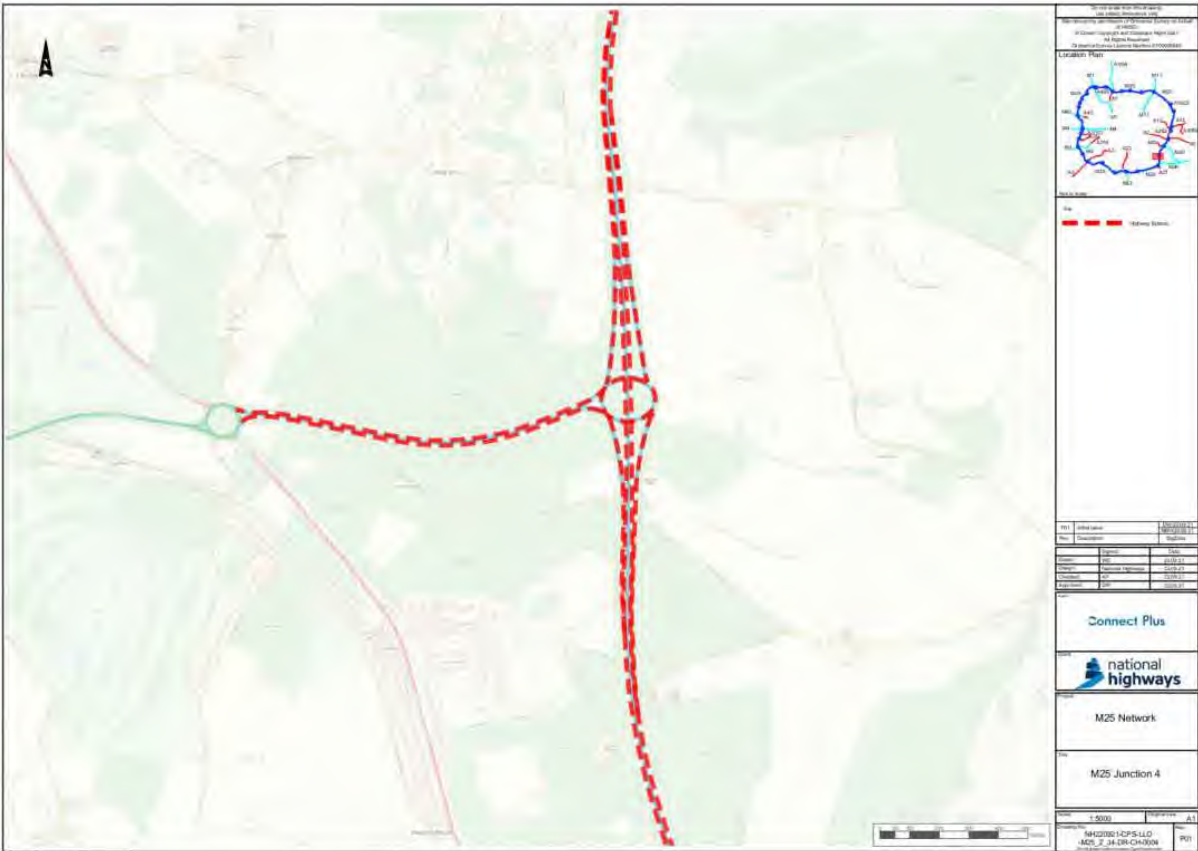
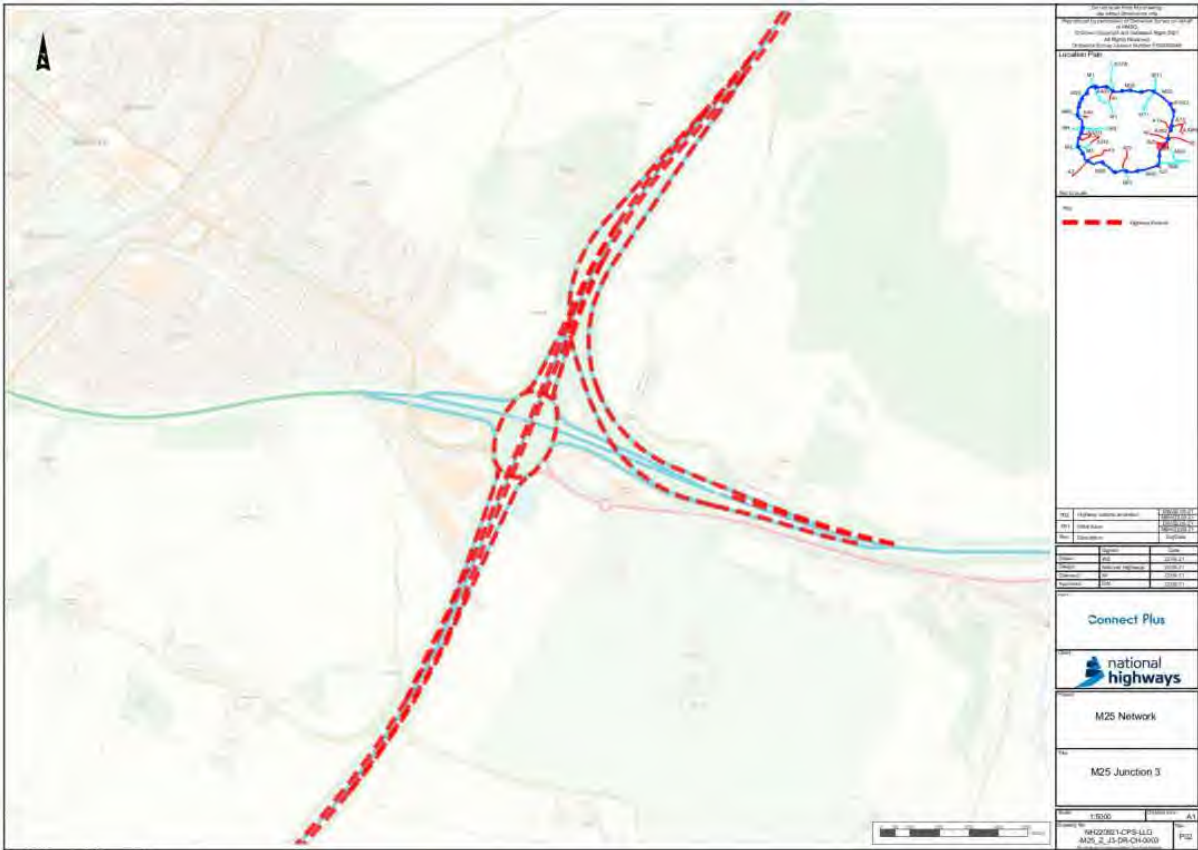
DLA Piper UK LLP
Attention: National Highways Injunction Team (Ref: PXB/RXS/439241/16)
Elshaw House
51 Carver Street
Sheffield
S1 4FT
E: NH-Injunctions@dlapiper.com
T: 0207 349 0296

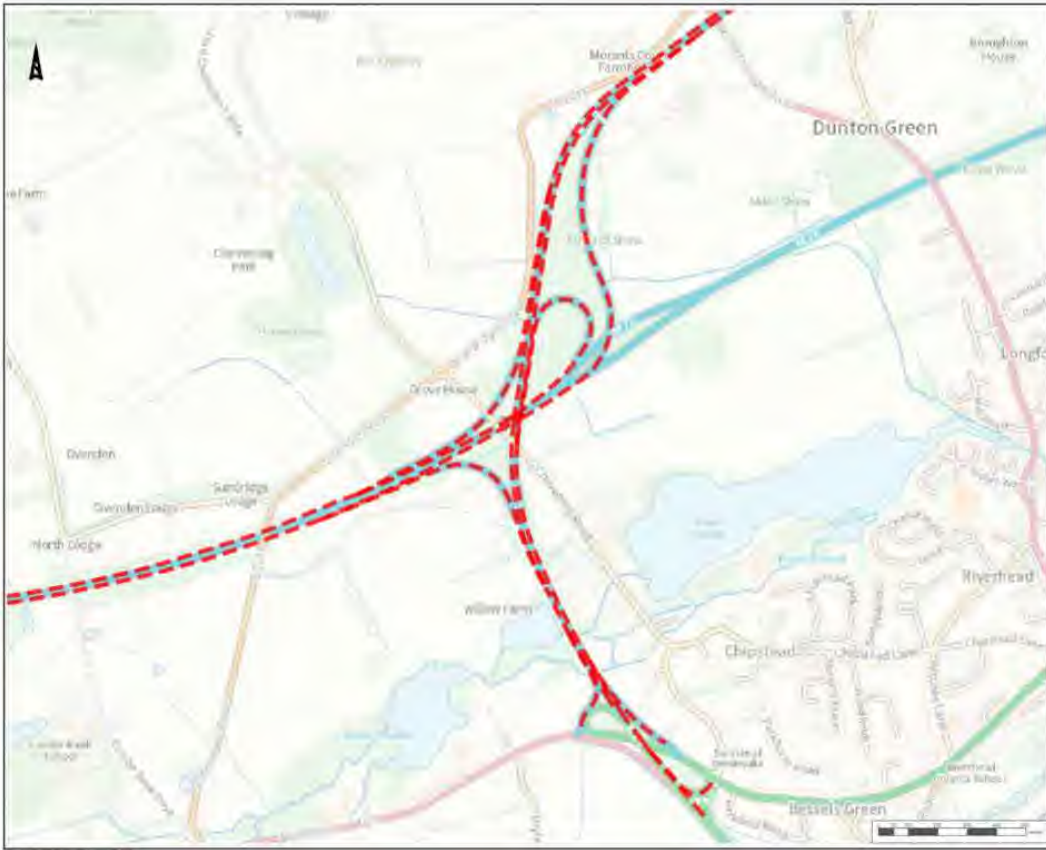
BY THE COURT

MADE ON 26 JULY 2024

APPENDIX 1





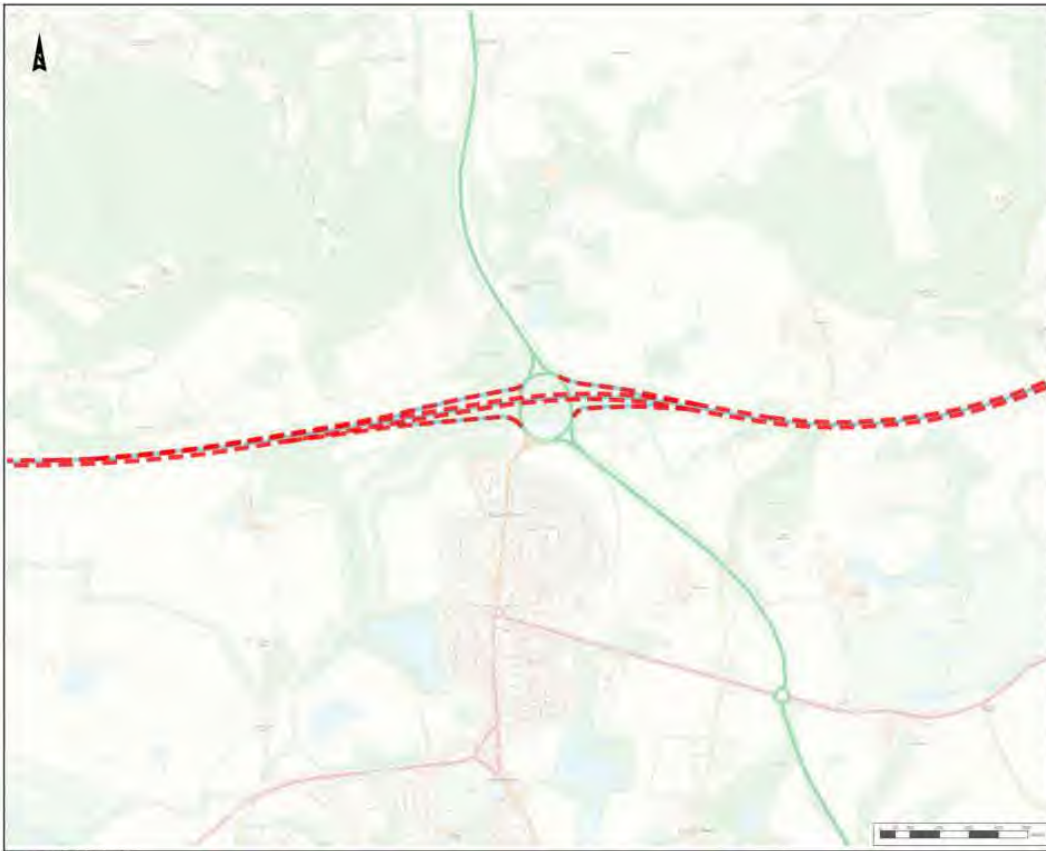


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 Date: 2023-11-01
 Author: [Name]
 Checker: [Name]
 Approver: [Name]

Legend
 - - - - - Highway Scheme

Connect Plus
national highways
 M25 Network
 M25 Junction 5

Scale: 1:10,000
 Project: M25 Junction 5
 Date: 2023-11-01

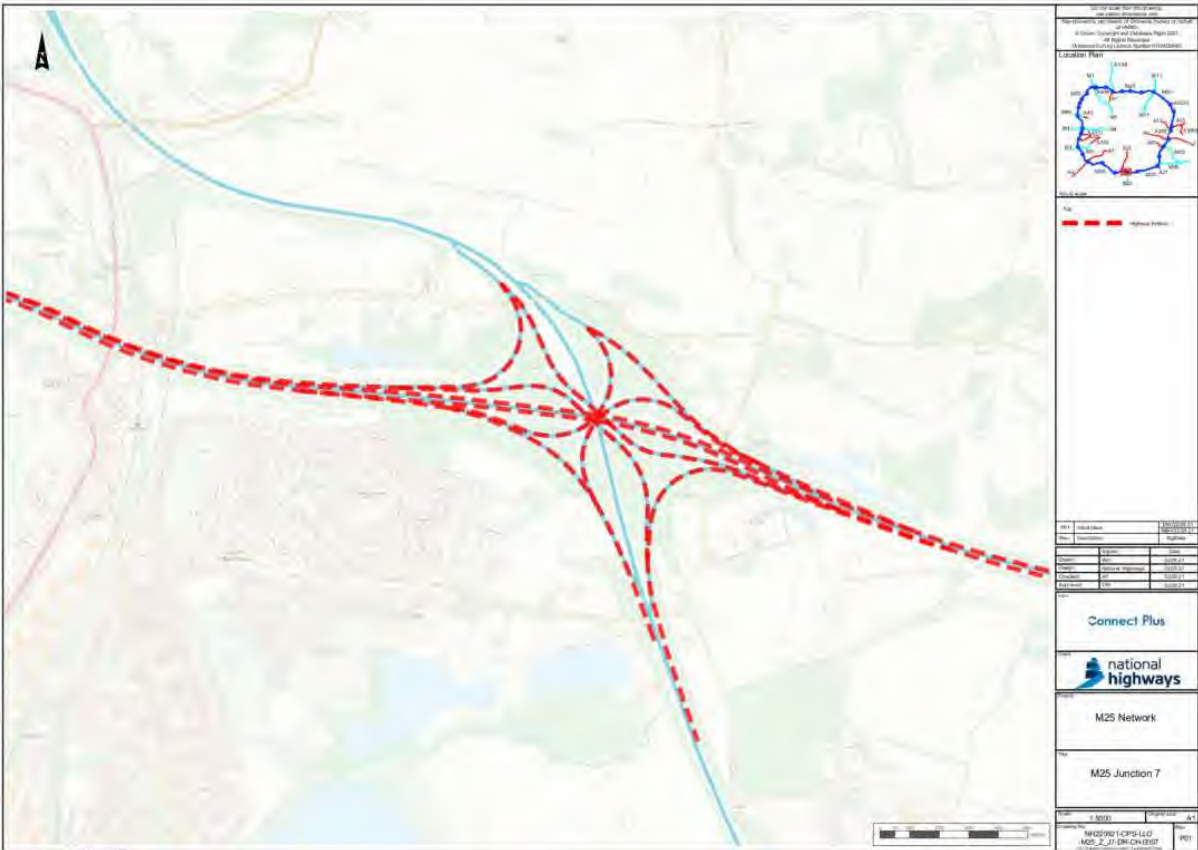


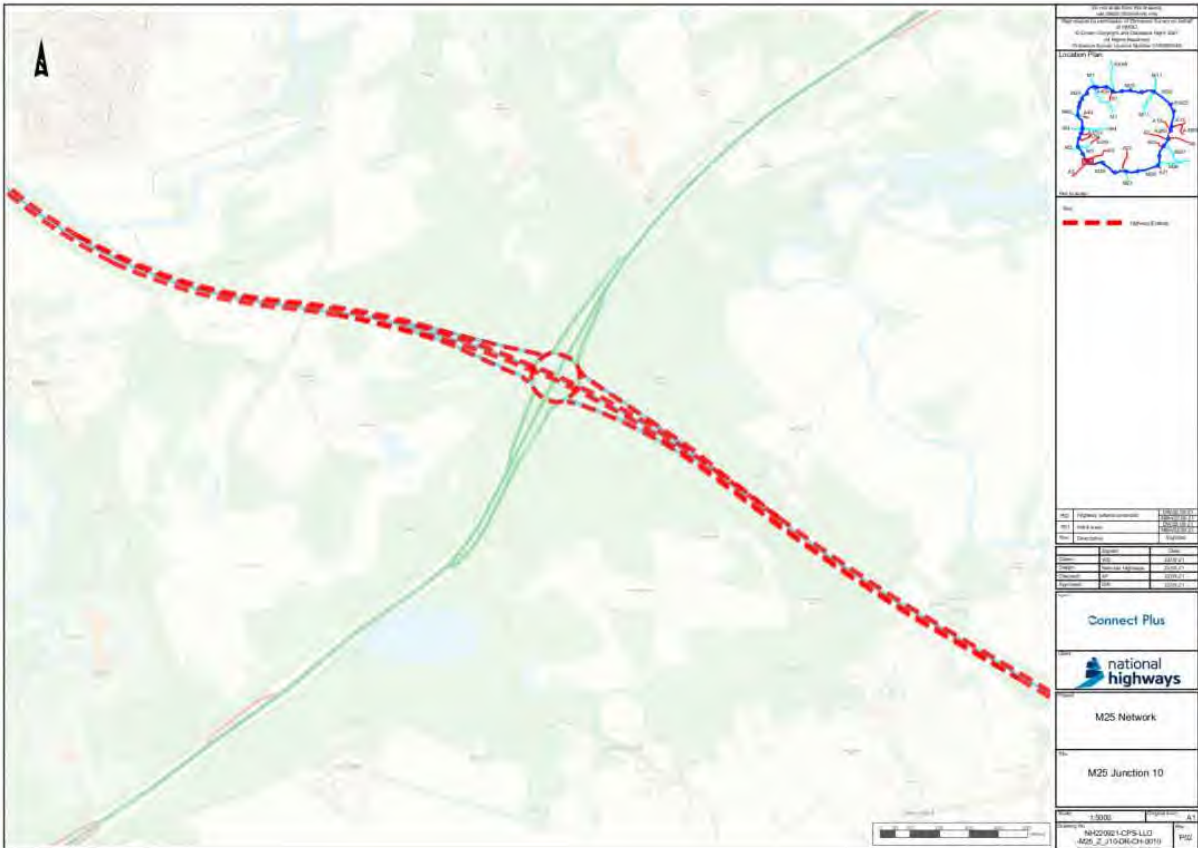
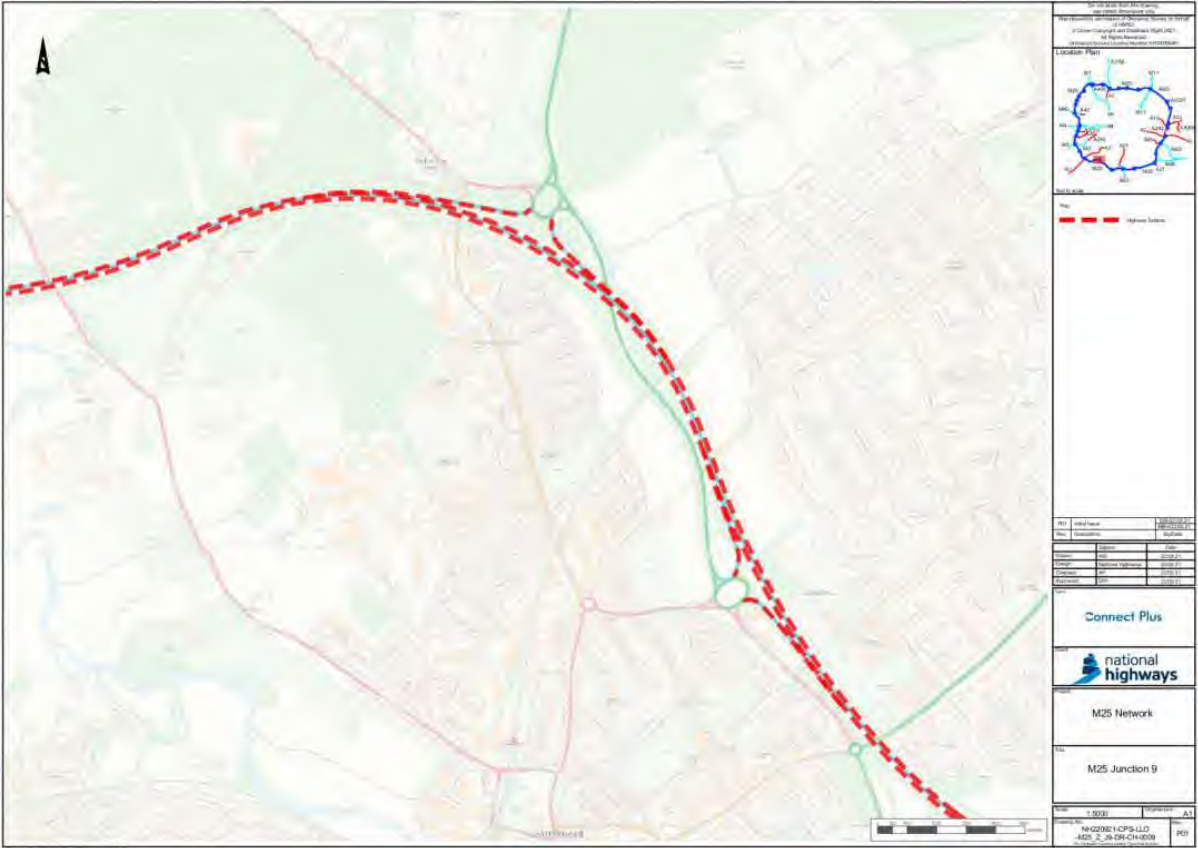
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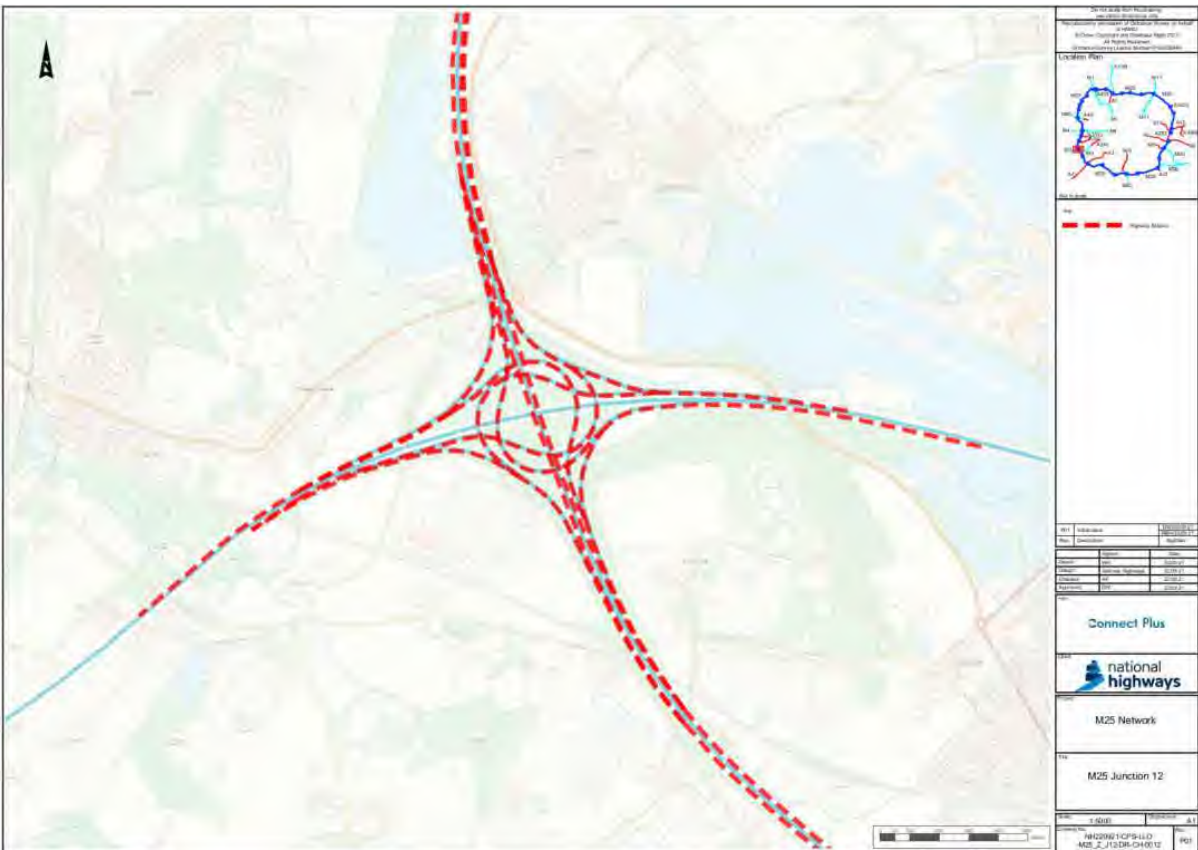
Legend
 - - - - - Highway Scheme

Connect Plus
national highways
 M25 Network
 M25 Junction 6

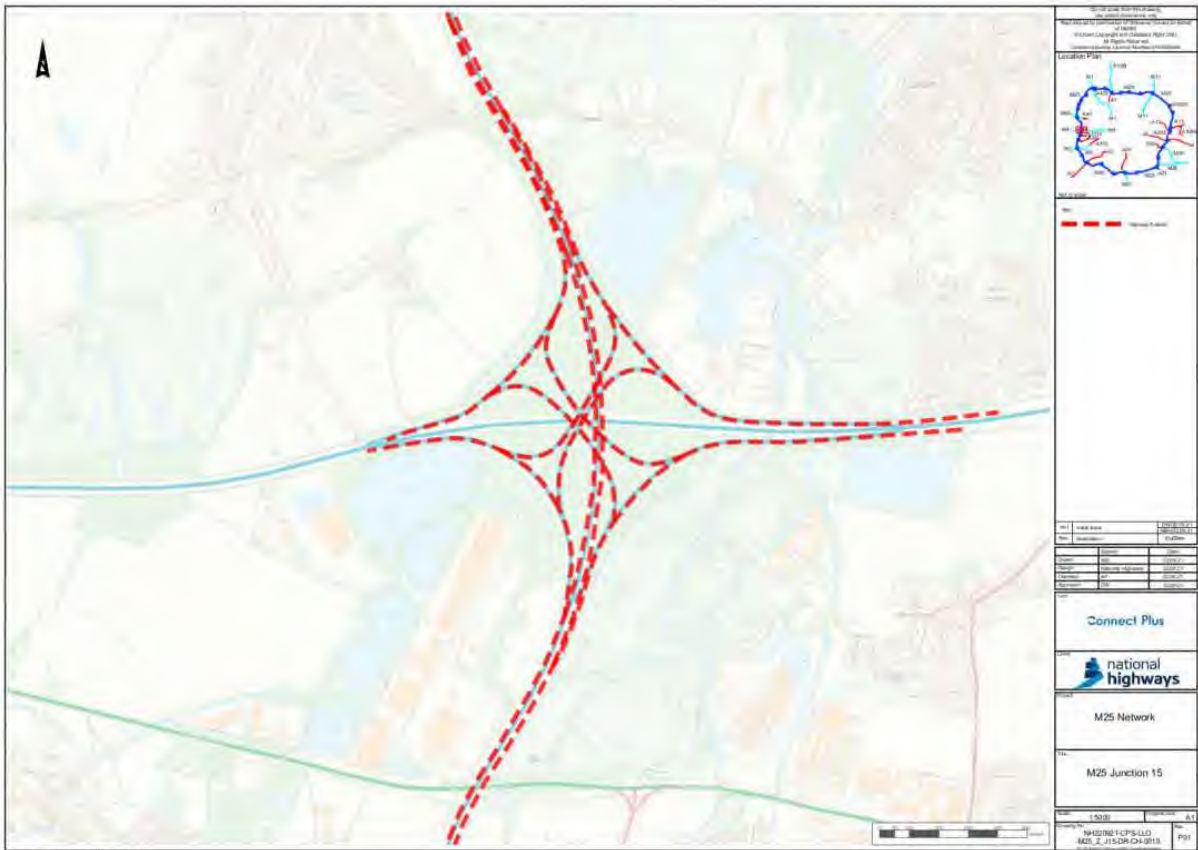
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 Date: 2023-11-01

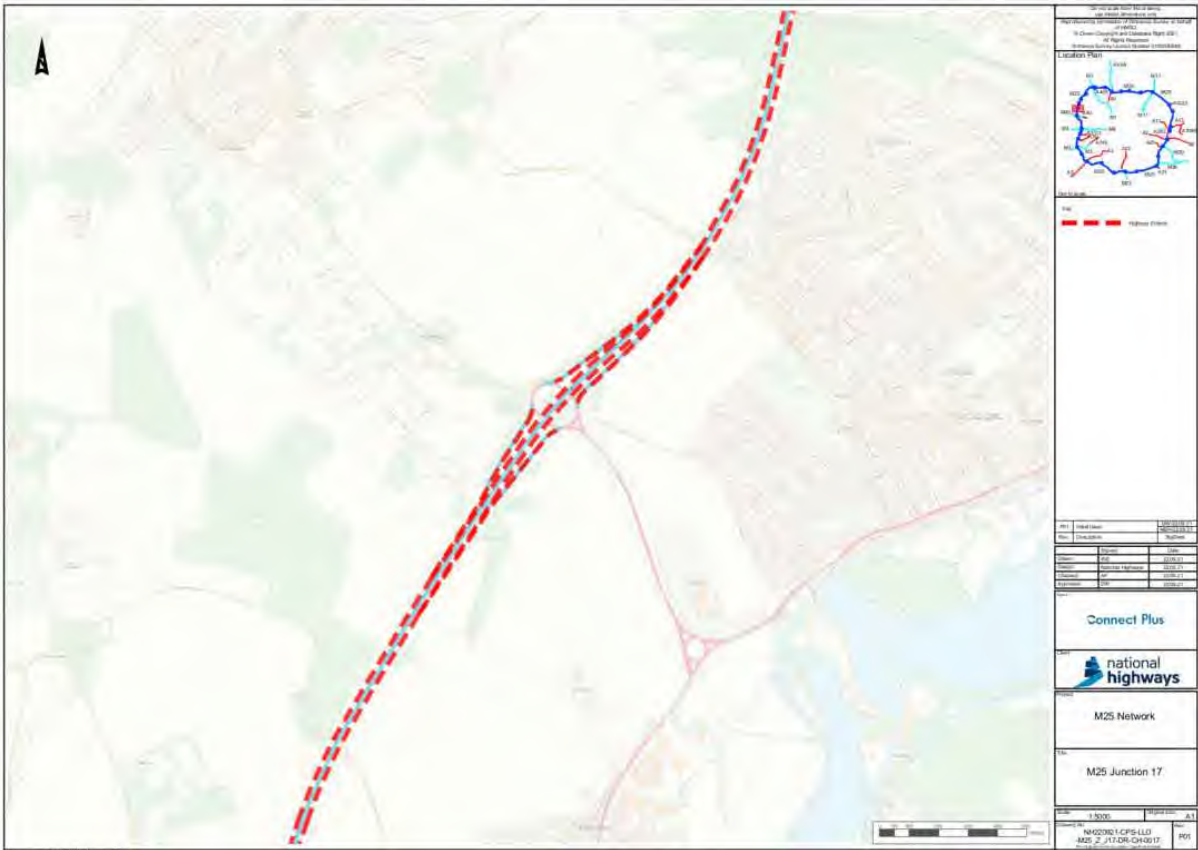




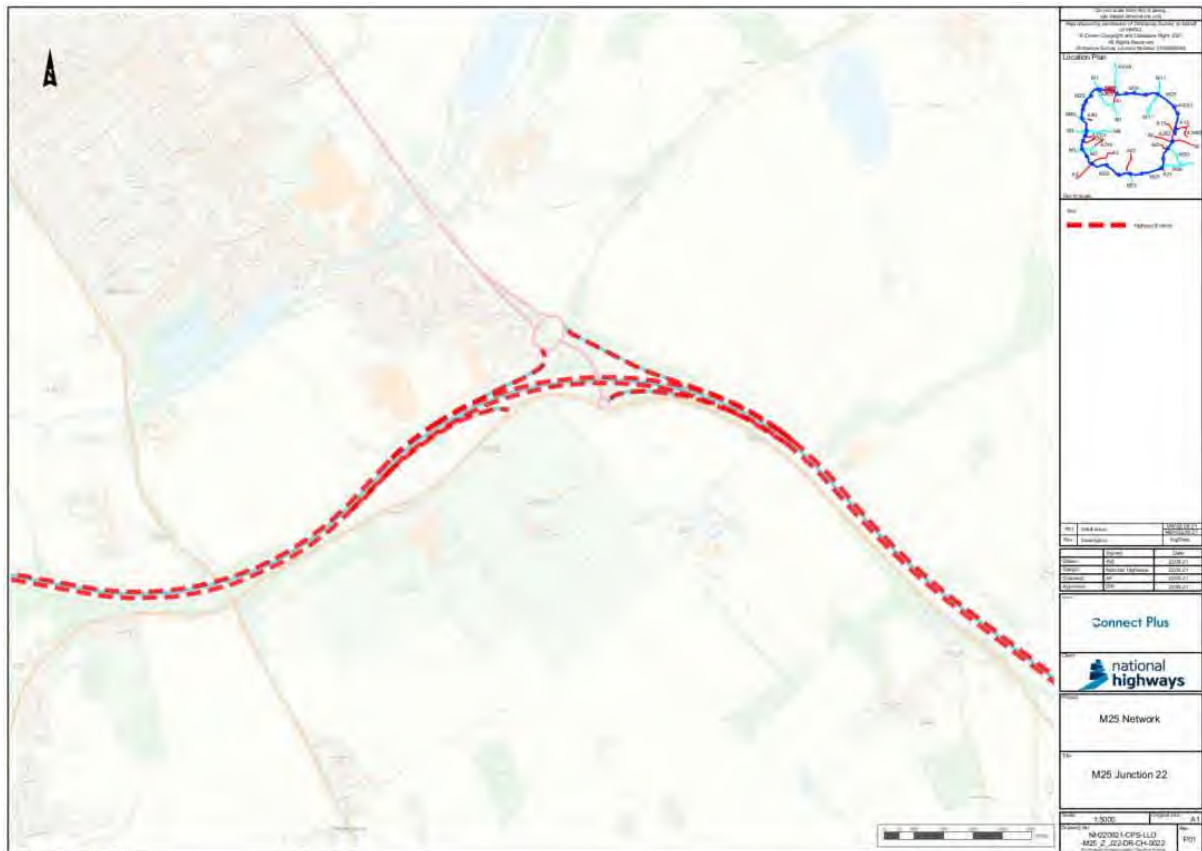


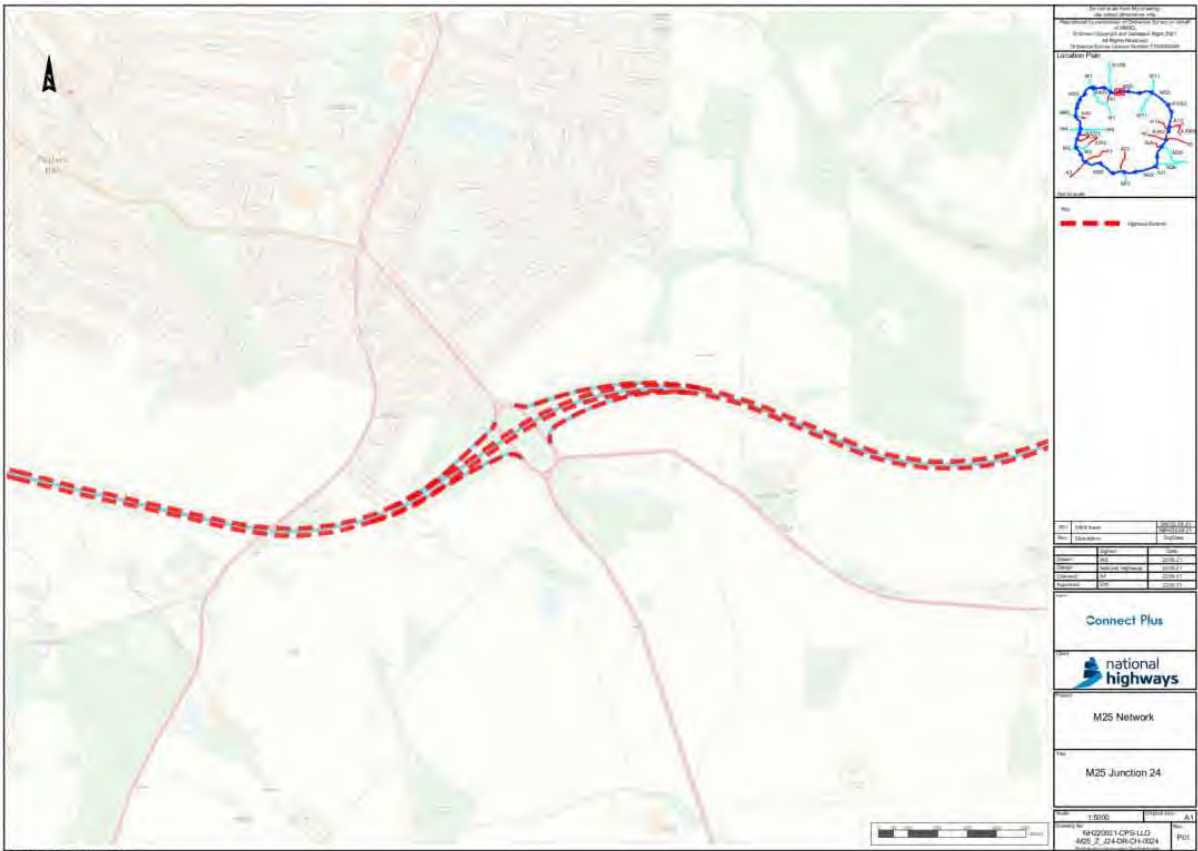


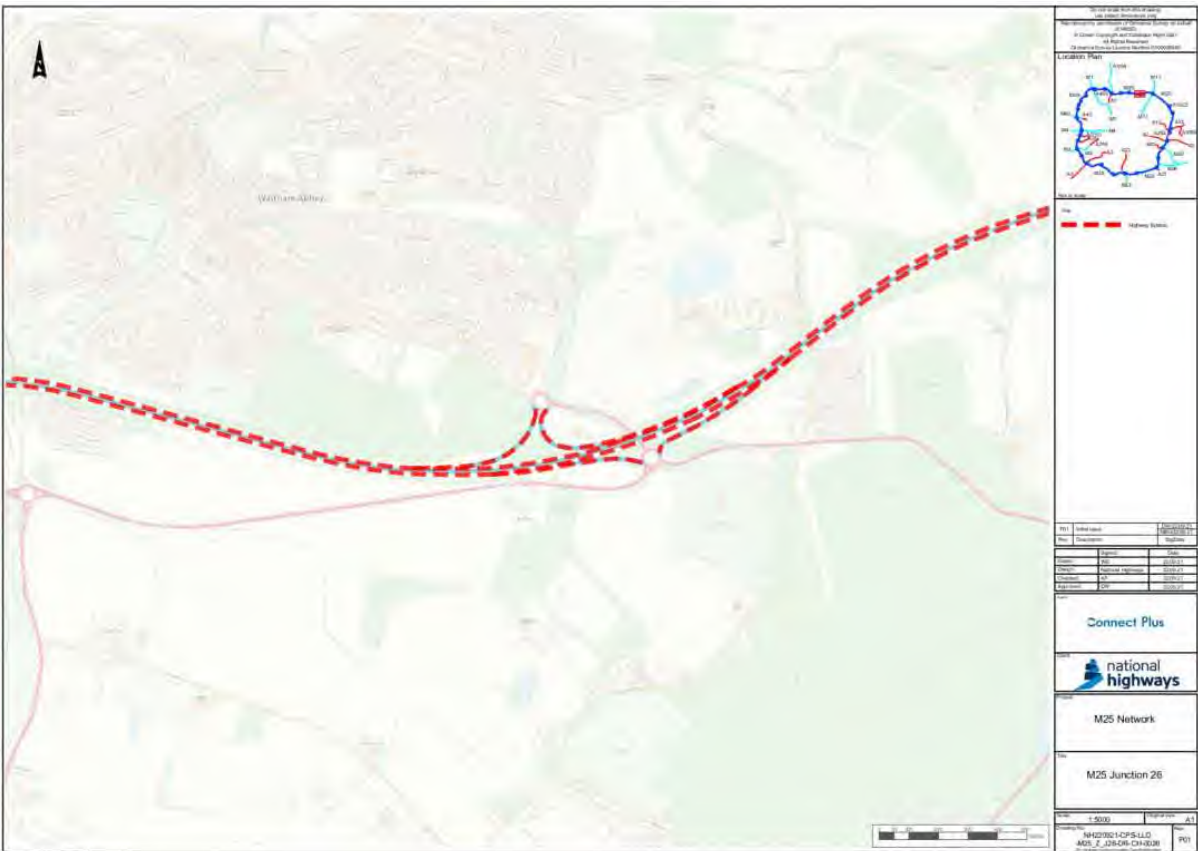
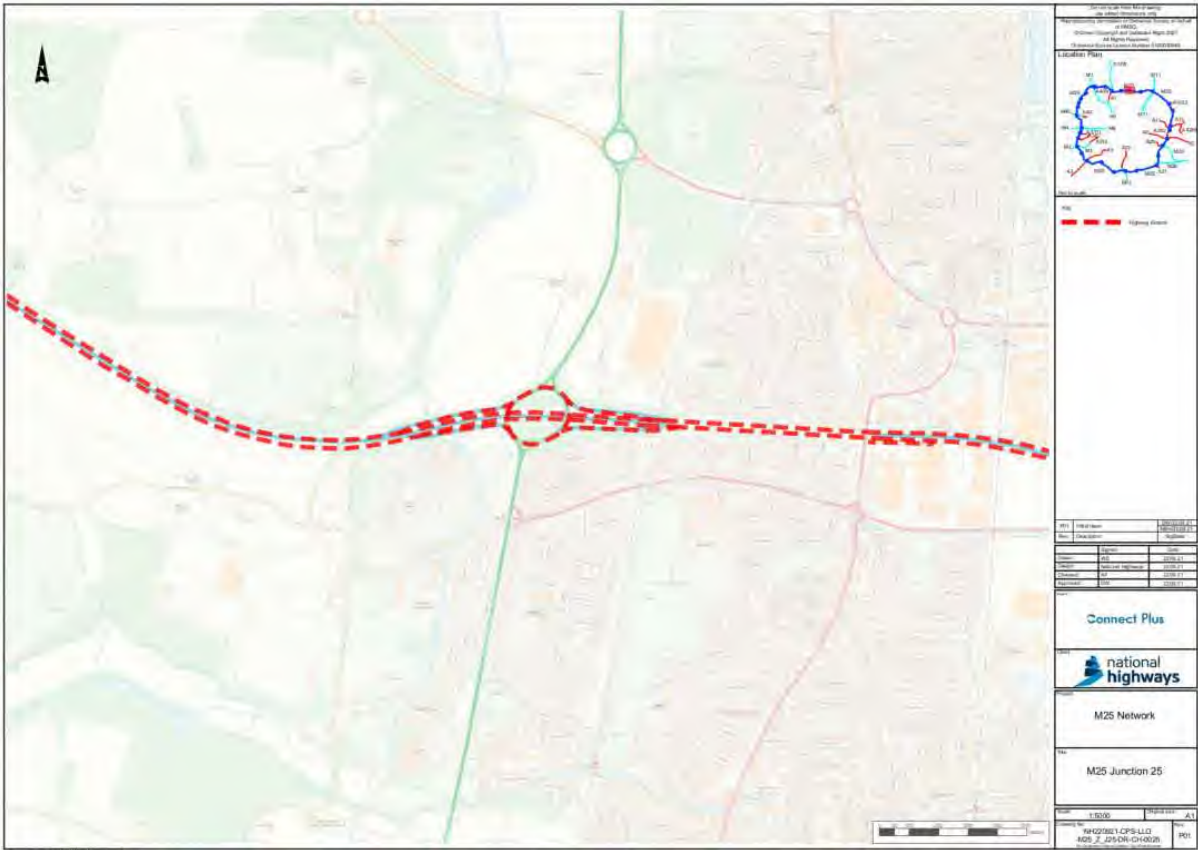




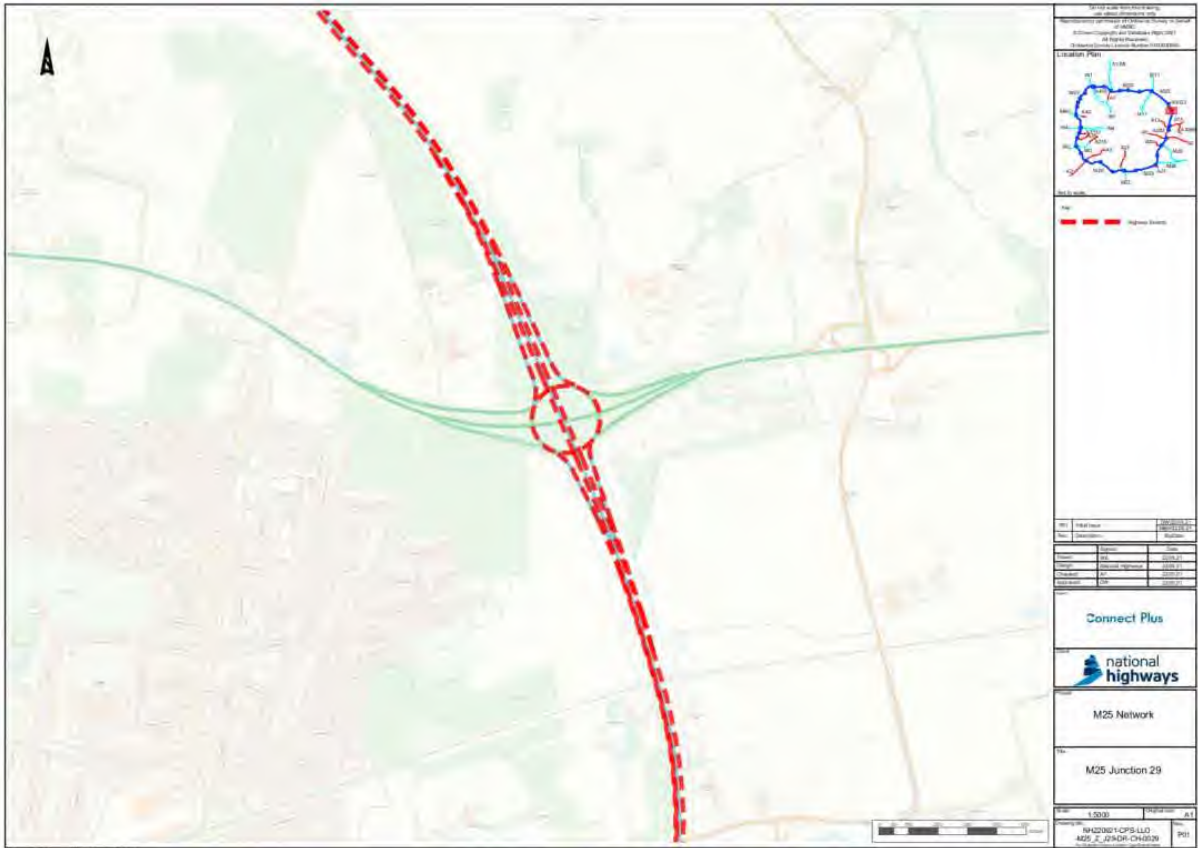










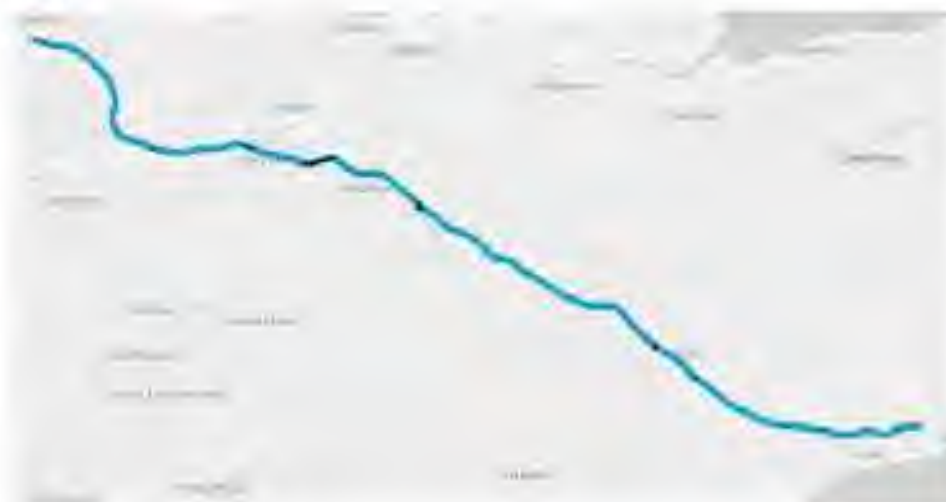


APPENDIX 2

A20 London - M25



M20



A20 Coast Section



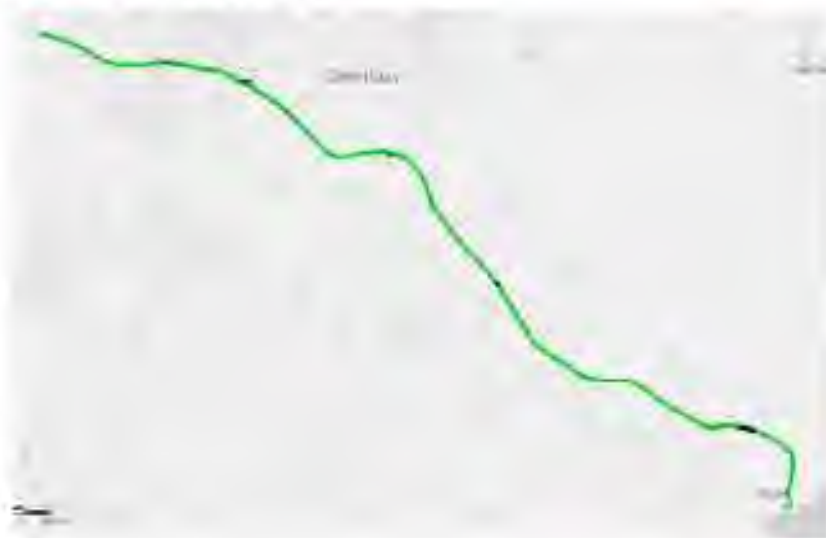
A2 London – M2 Section



M2



A2 M2 - Dover Section



A2070



Kent & Surrounding areas SRN



APPENDIX 3

Strategic Road Network – South East



1. A1(M) from Junction 1 to Junction 6
- 1a. A1 from A1(M) to Rowley Lane
2. M11 from Junction 4 to Junction 7
3. A12 from M25 Junction 28 to A12 Junction 12
- 3a. A1023 (Brook Street) from M25 Junction 28 roundabout to Brook Street Shell Petrol Station access
4. A13 from M25 Junction 30 to junction with A1089
- 4a. A13 from junction with A1306 for Wennington to M25 Junction 30
- 4b. A1089 from junction with A13 to Port of Tilbury entrance

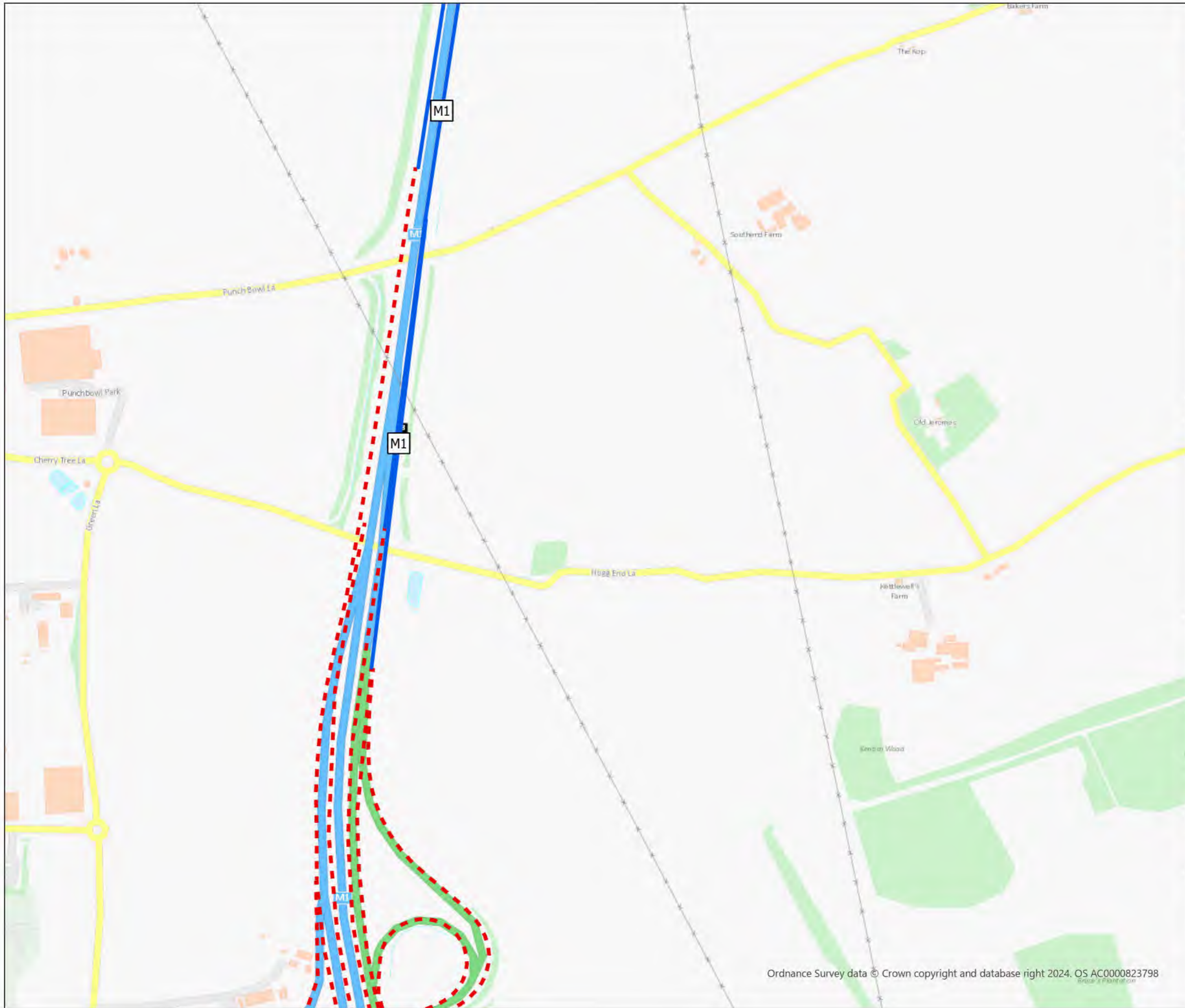
5. M26 (the whole motorway) from M25 to M20
6. A21 from the M25 to B2042
7. A23 from M23 to Star Shaw
8. M23 from Junction 7 to Junction 10 (including M23 Gatwick Spur)
9. A23 between North and South Terminal Roundabouts
10. A3 from A309 to B2039 Ripley Junction
11. M3 from Junction 1 to Junction 4
- 11a. A316 from M3 Junction 1 to Felthamhill Brook
12. A30 from M25 Junction 13 to Harrow Road, Stanwell, Feltham
13. A3113 from M25 Junction 14 to A3044
14. M4 from Junction 4B to Junction 7
15. M4 Spur (whole spur) from M4 Junction 4 to M4 Junction 4a
16. M4 from Junction 1 to Junction 4B
17. M40 from M40 Junction 7 to A40 (Fray's River Bridge)
18. M1 from Junction 1 to Junction 8
- 18a. A405 from M25 Junction 21A to M1 Junction 6
- 18b. A1 from Fiveways Corner roundabout to Hilltop Gardens
19. A414 from M1 Junction 8 to A405

APPENDIX 4



Additional Parts Plan:

1. M1 Junction 8 to Junction 11.
2. A1081 from M1 Junction 10 to the start of the London Road slip road.
3. M11 Junction 7 to Junction 10, including M11 A1301 junction.
4. A120 from M11 Junction 8 to B1256, adjacent to Huntingfields House.



Key:

Injunction Roads

■ covered by injunction 26/04/2024

UK Airports

National Highways South East Injunction Additional Parts



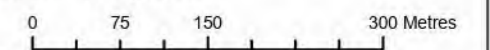
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Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

Scale: 1:5,000



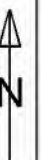
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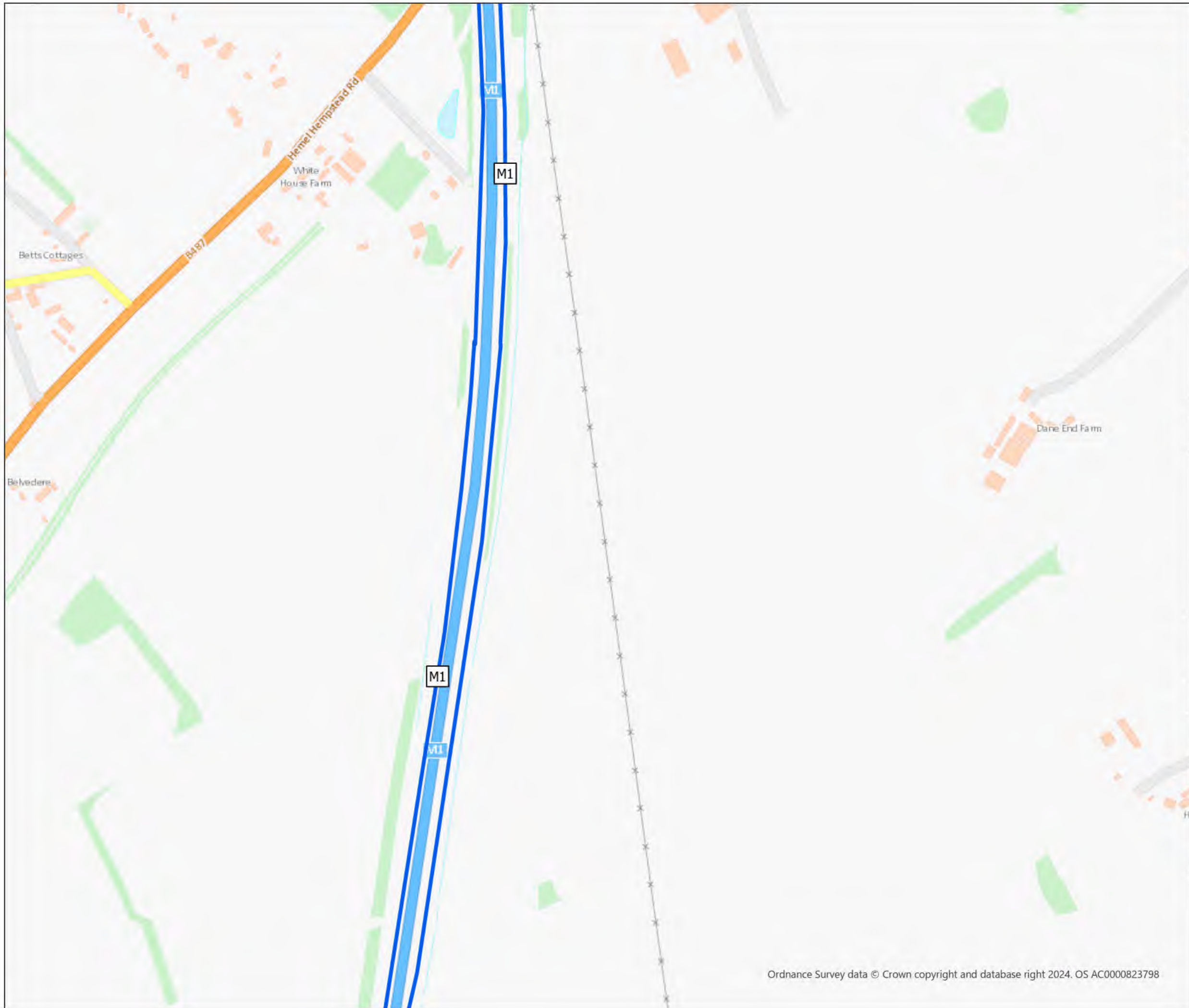
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- Key:**
- covered by injunction 26/04/2024
 - UK Airports
 - National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M1 J8-9

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

Scale: 1:5,000

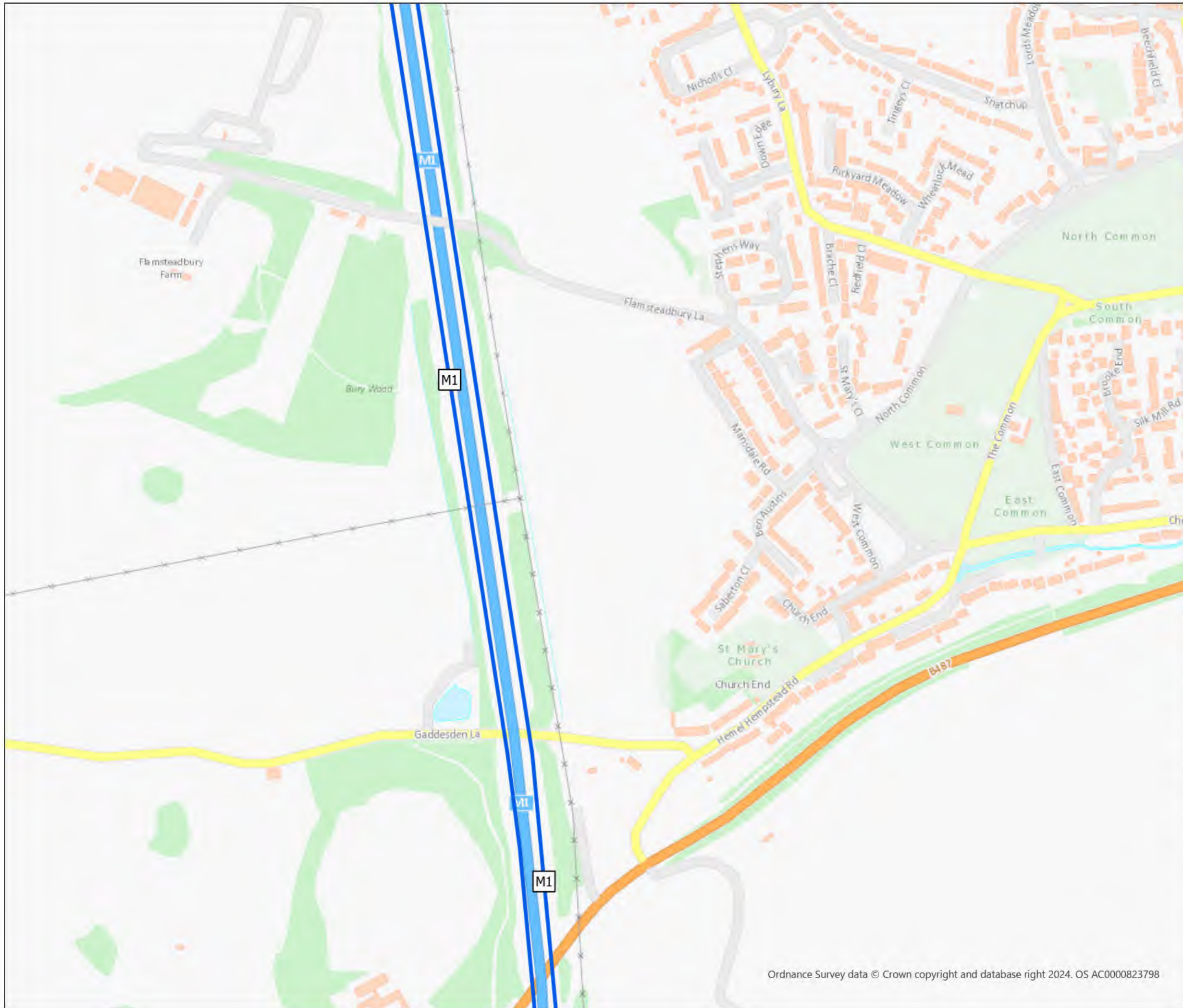
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Key:

Injunction Roads

••• covered by injunction 26/04/2024

 UK Airports

 National Highways South East Injunction Additional Parts



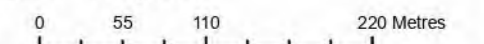
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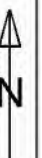


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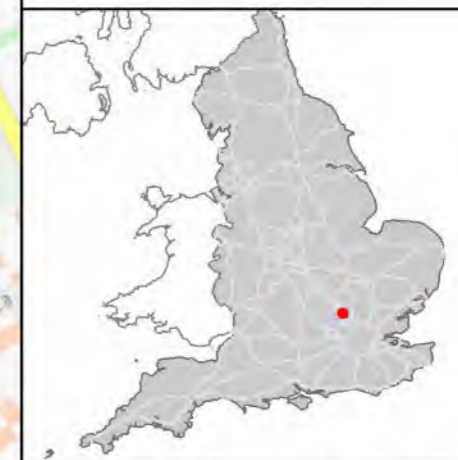
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Injunction Roads

■ covered by injunction 26/04/2024

 UK Airports

 National Highways South East Injunction Additional Parts



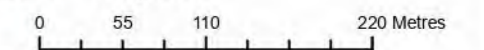
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Project: N/A

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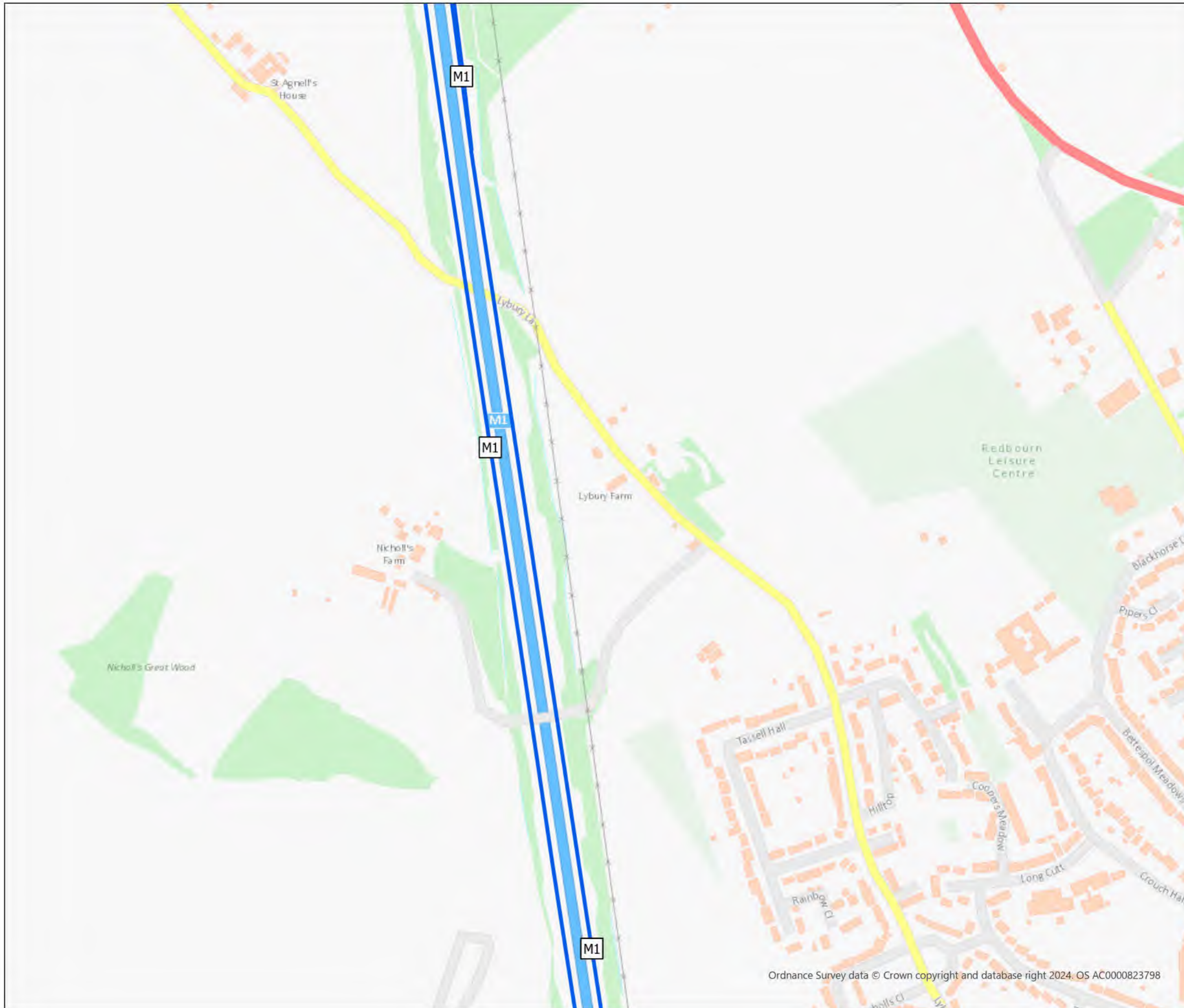
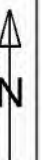


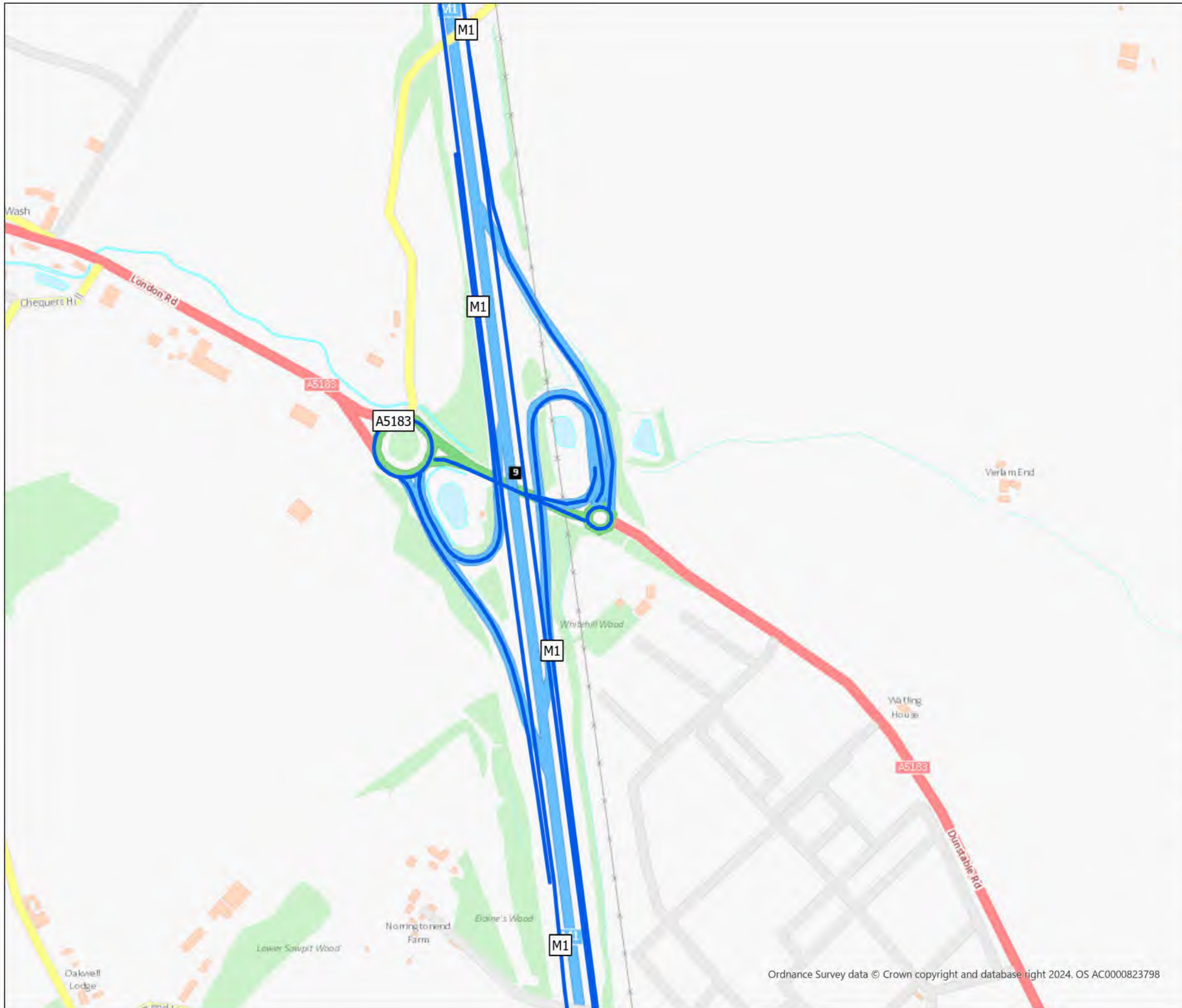
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- Key:**
- Injunction Roads**
 - covered by injunction 26/04/2024
 - ✈ UK Airports
 - National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M1 J9

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

Scale: 1:5,000

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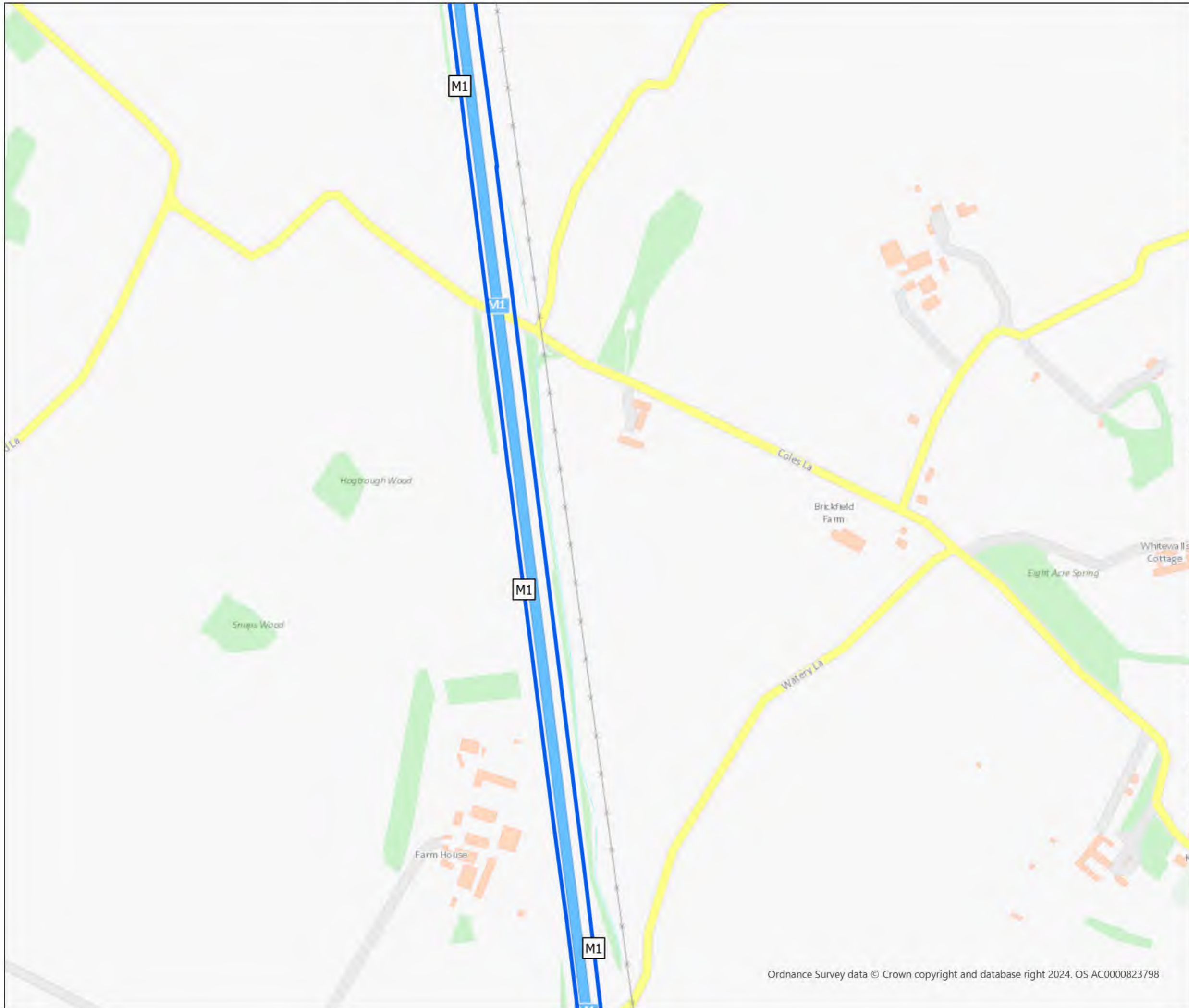
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Key:

Injunction Roads

- covered by injunction 26/04/2024
- ✈ UK Airports
- National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M1 J9-10

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

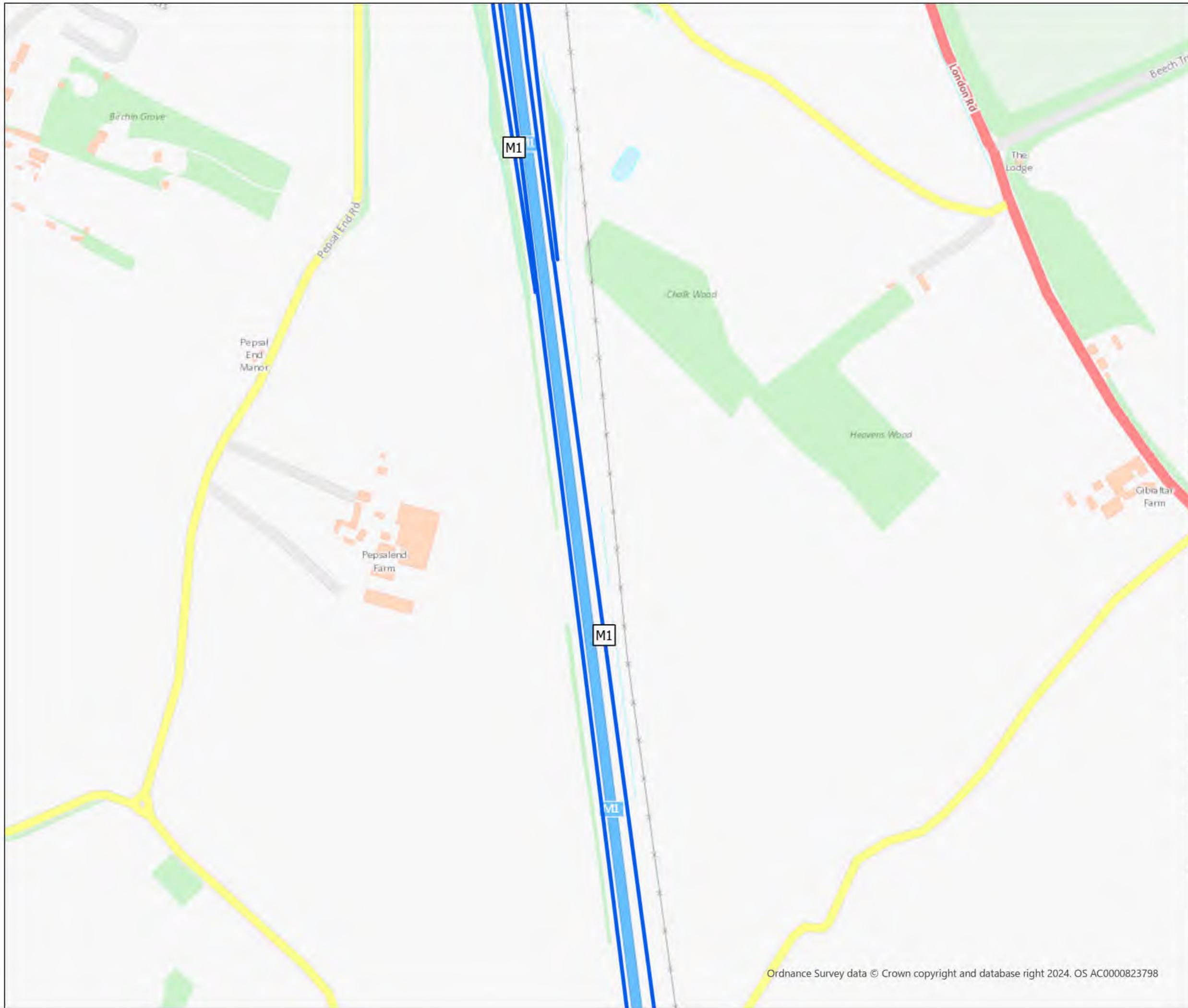
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Key:

Injunction Roads

- Red dashed line: covered by injunction 26/04/2024
- Blue line: National Highways South East Injunction Additional Parts

UK Airports



Title: Strategic Road Network - M1 J9-10

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

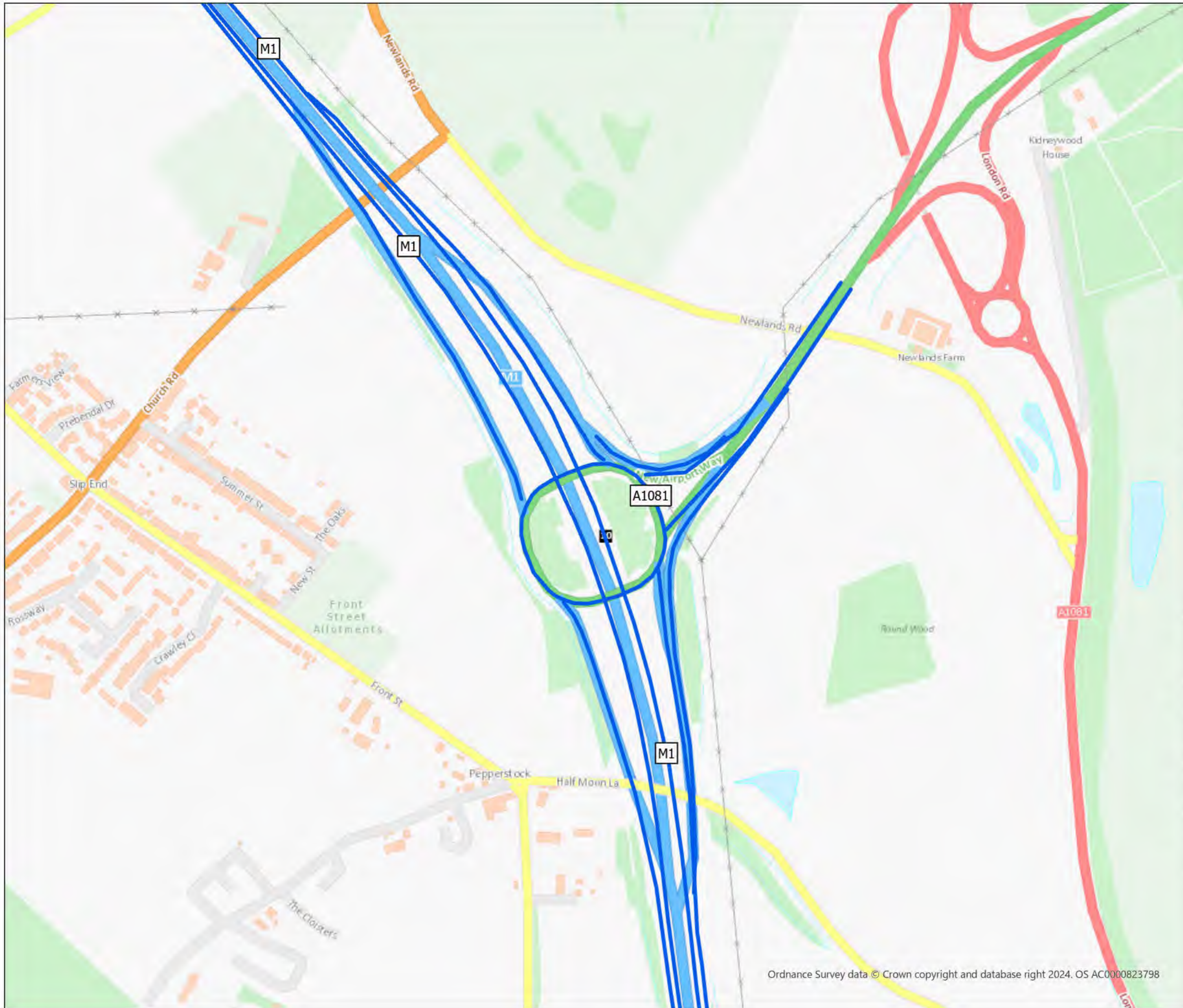
Scale: 1:5,000

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Key:
Injunction Roads
 ■■■ covered by injunction 26/04/2024
 UK Airports
 National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M1 J10

Project: N/A

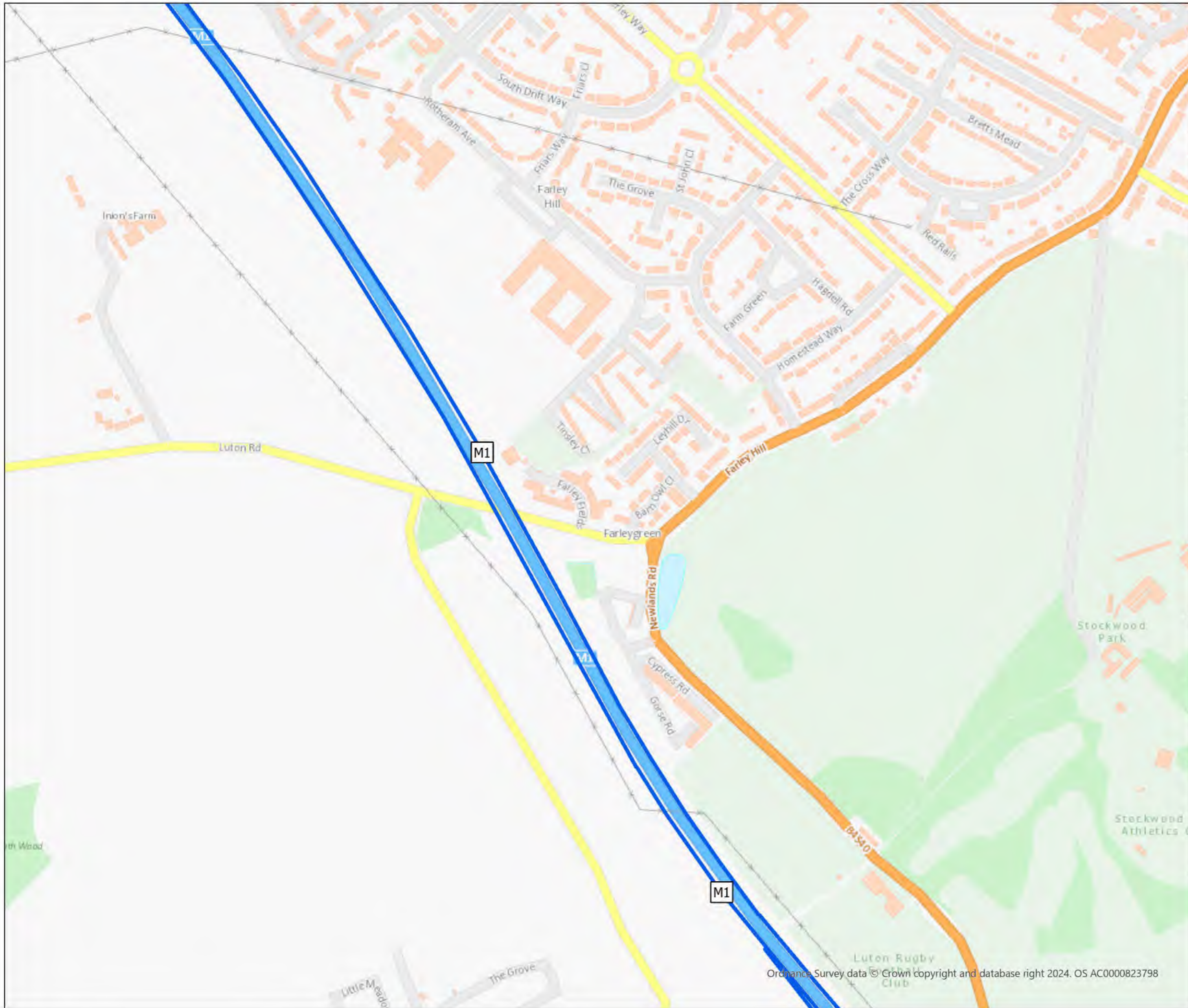
Version Control: V1

Drawn By: G Phipp **Checked By:** KA
Date: 22/07/2024

Scale: 1:5,000
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Key:

Injunction Roads

- Red dashed line: covered by injunction 26/04/2024
- Plane icon: UK Airports
- Blue line: National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M1 J10-11

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

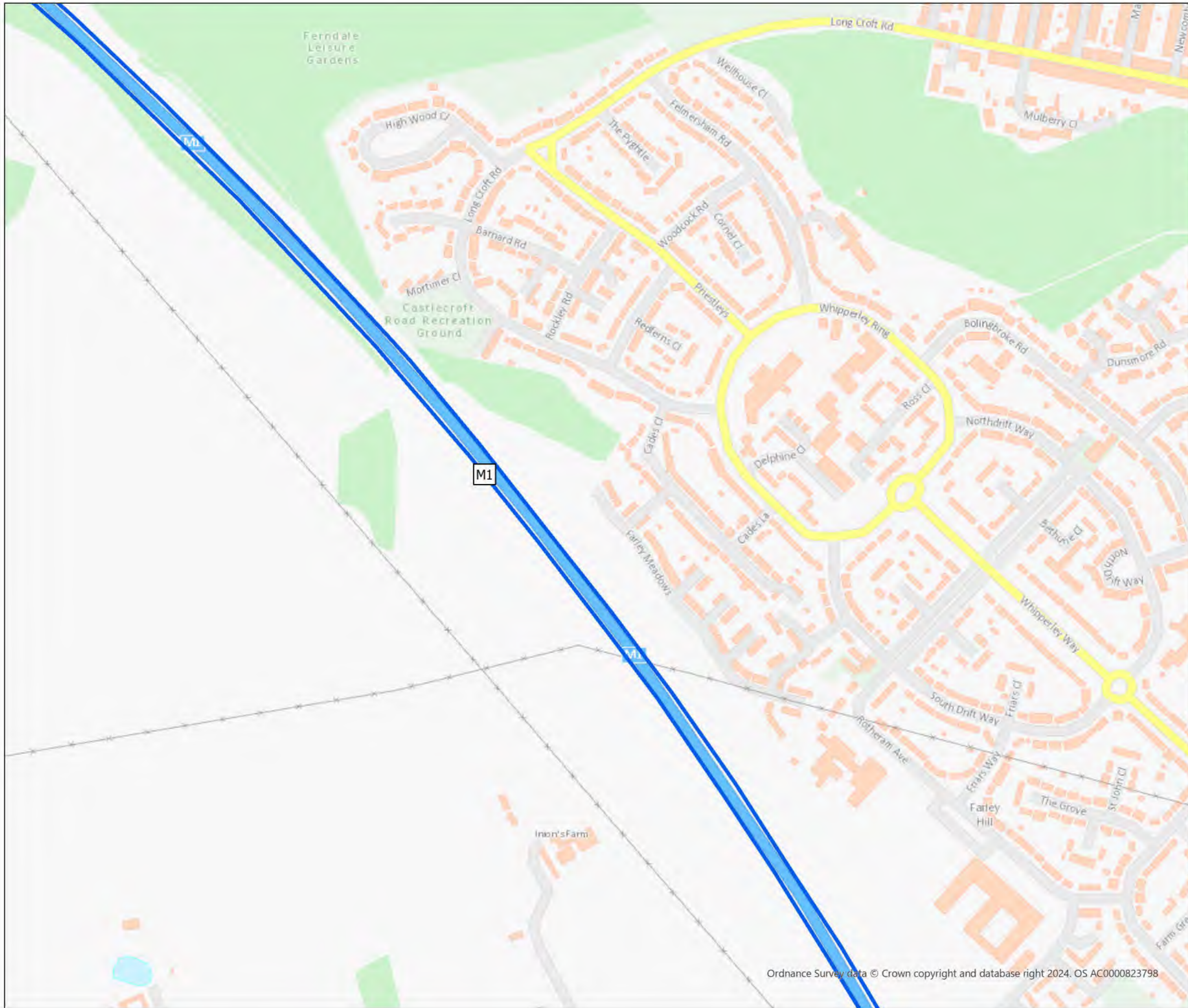
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Key:

Injunction Roads

- covered by injunction 26/04/2024
- ✈ UK Airports
- National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M1 J10-11

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

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Key:

Injunction Roads

- Red dashed line: covered by injunction 26/04/2024

UK Airports

National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M1 J10-11

Project: N/A

Version Control: V1

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Key:

- covered by injunction 26/04/2024
- UK Airports
- National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M1 J11

Project: N/A

Version Control: V1

Drawn By: G Phipp **Checked By:** KA
Date: 23/07/2024

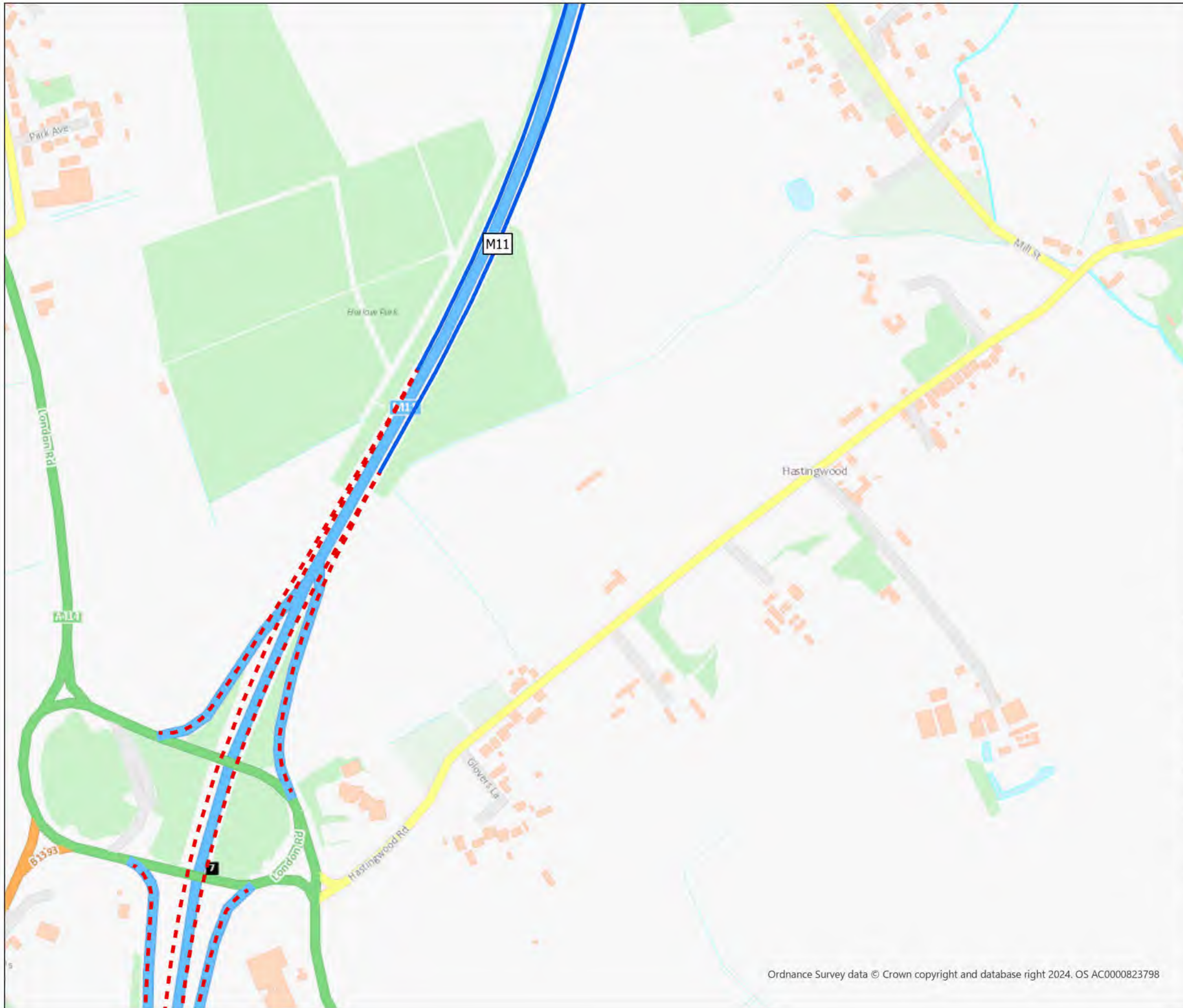
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Key:

Injunction Roads

••• covered by injunction 26/04/2024

UK Airports

National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J7

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

Scale: 1:5,000



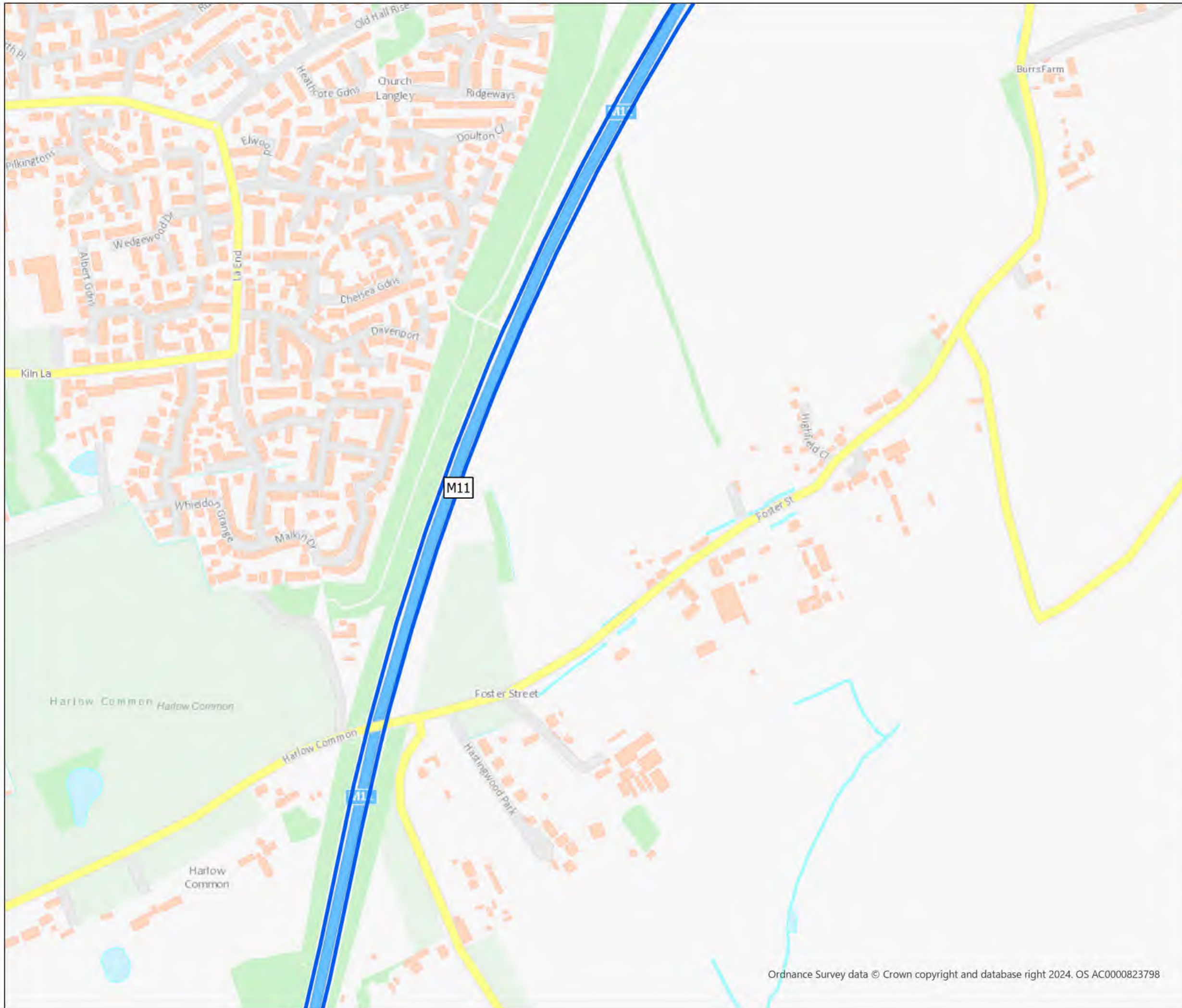
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Key:
Injunction Roads
 ■ covered by injunction 26/04/2024
 UK Airports
 National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J7-7a

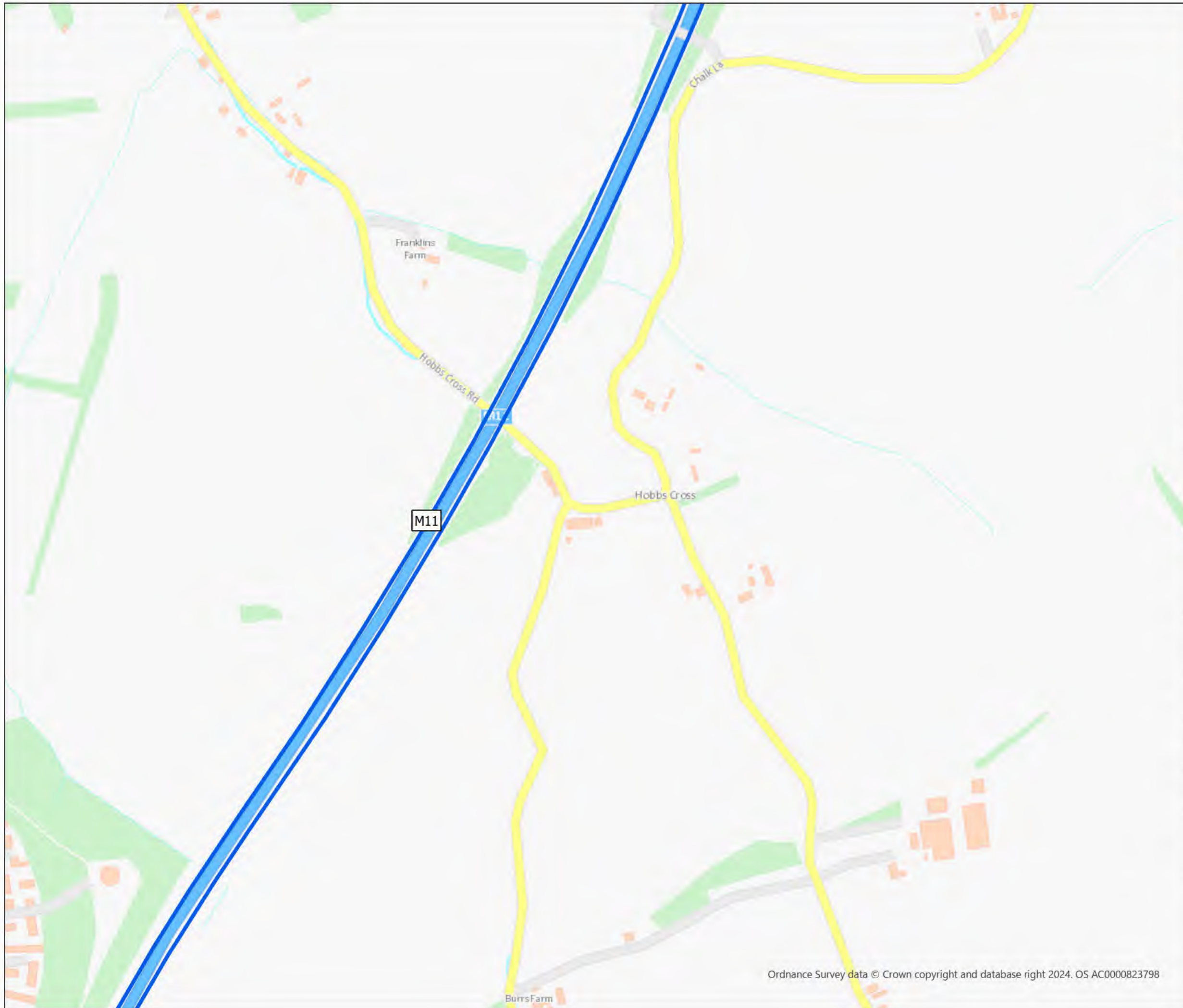
Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
 Date: 22/07/2024

Scale: 1:5,000

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- Key:**
- Injunction Roads**
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 - UK Airports
 - National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J7-7a

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

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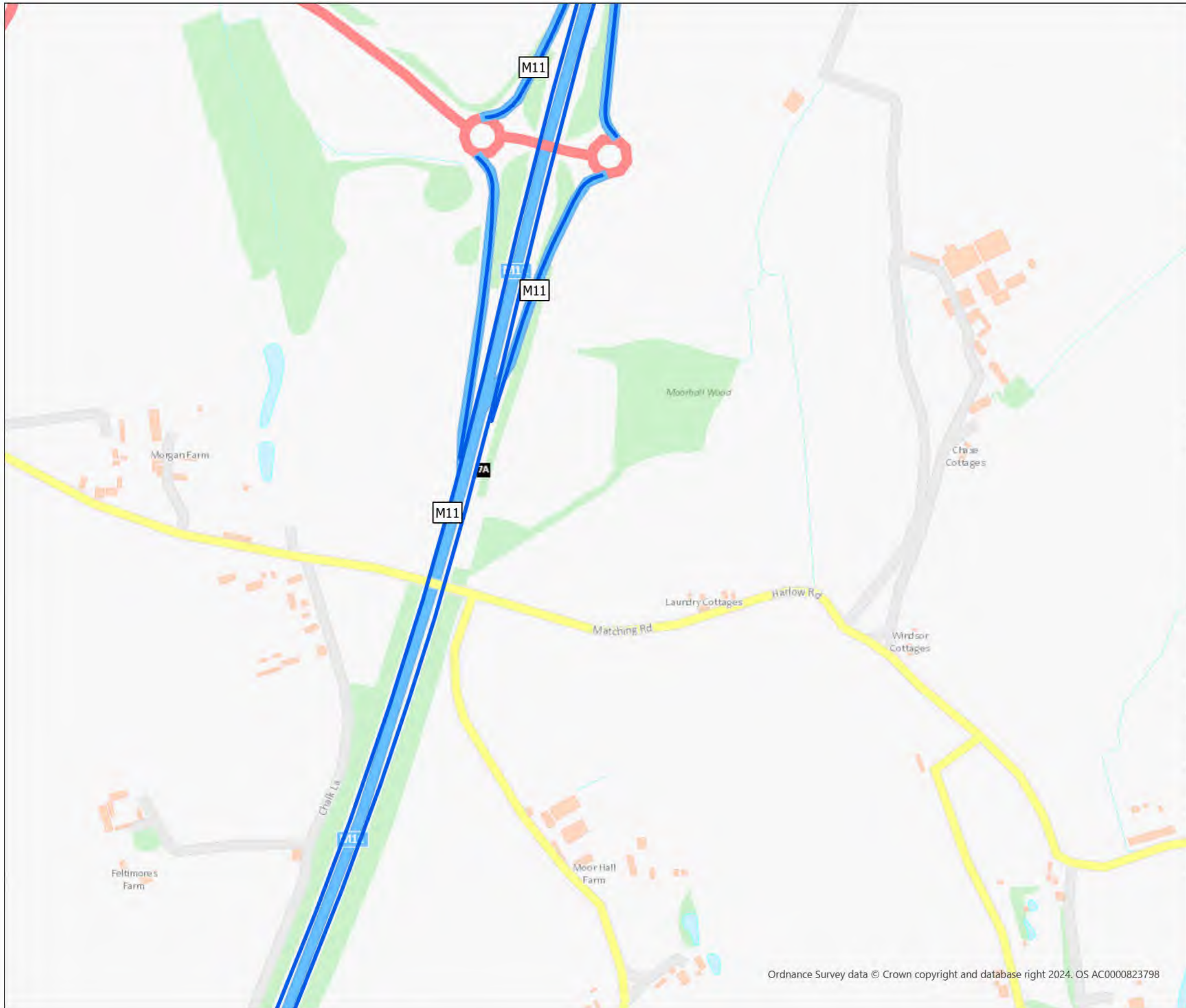
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Key:

Injunction Roads

■ covered by injunction 26/04/2024

 UK Airports

 National Highways South East Injunction Additional Parts



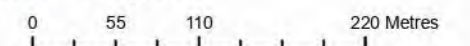
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Project: N/A

Version Control: V1

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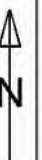


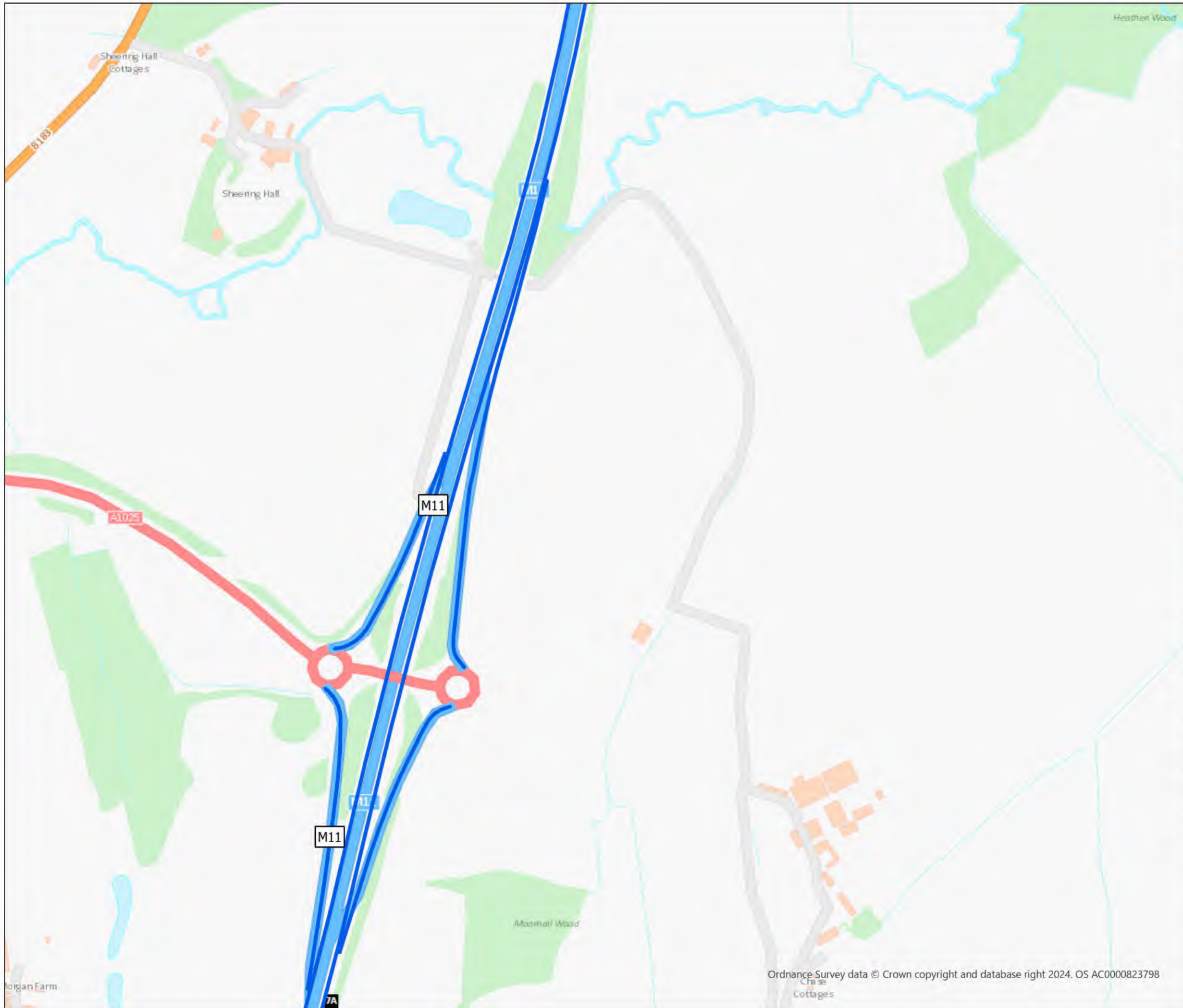
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- Key:**
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 - UK Airports
 - National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J7a-8

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

Scale: 1:5,000

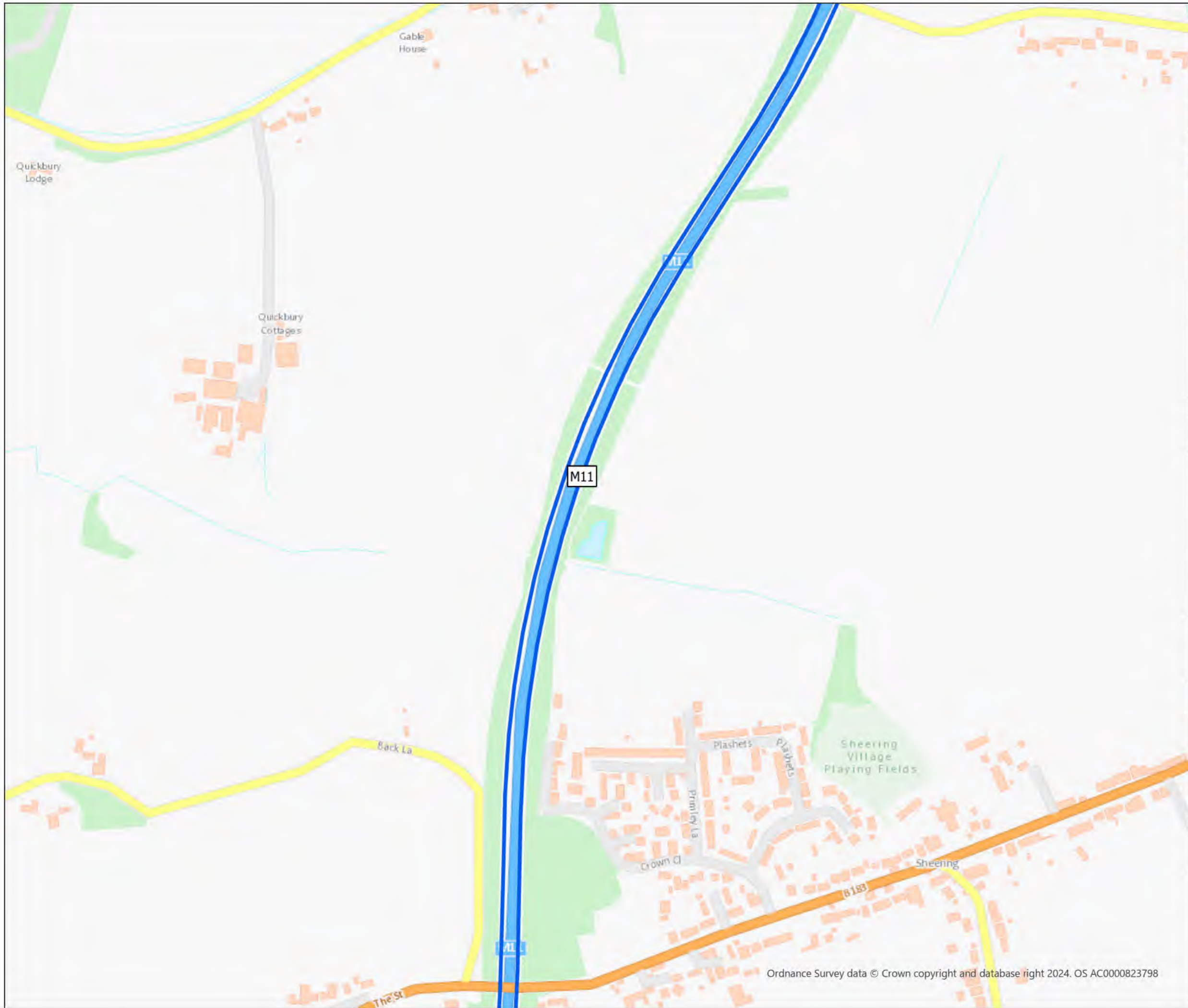
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Key:

Injunction Roads

- covered by injunction 26/04/2024
- ✈ UK Airports
- National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J7a-8

Project: N/A

Version Control: V1

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Date: 22/07/2024

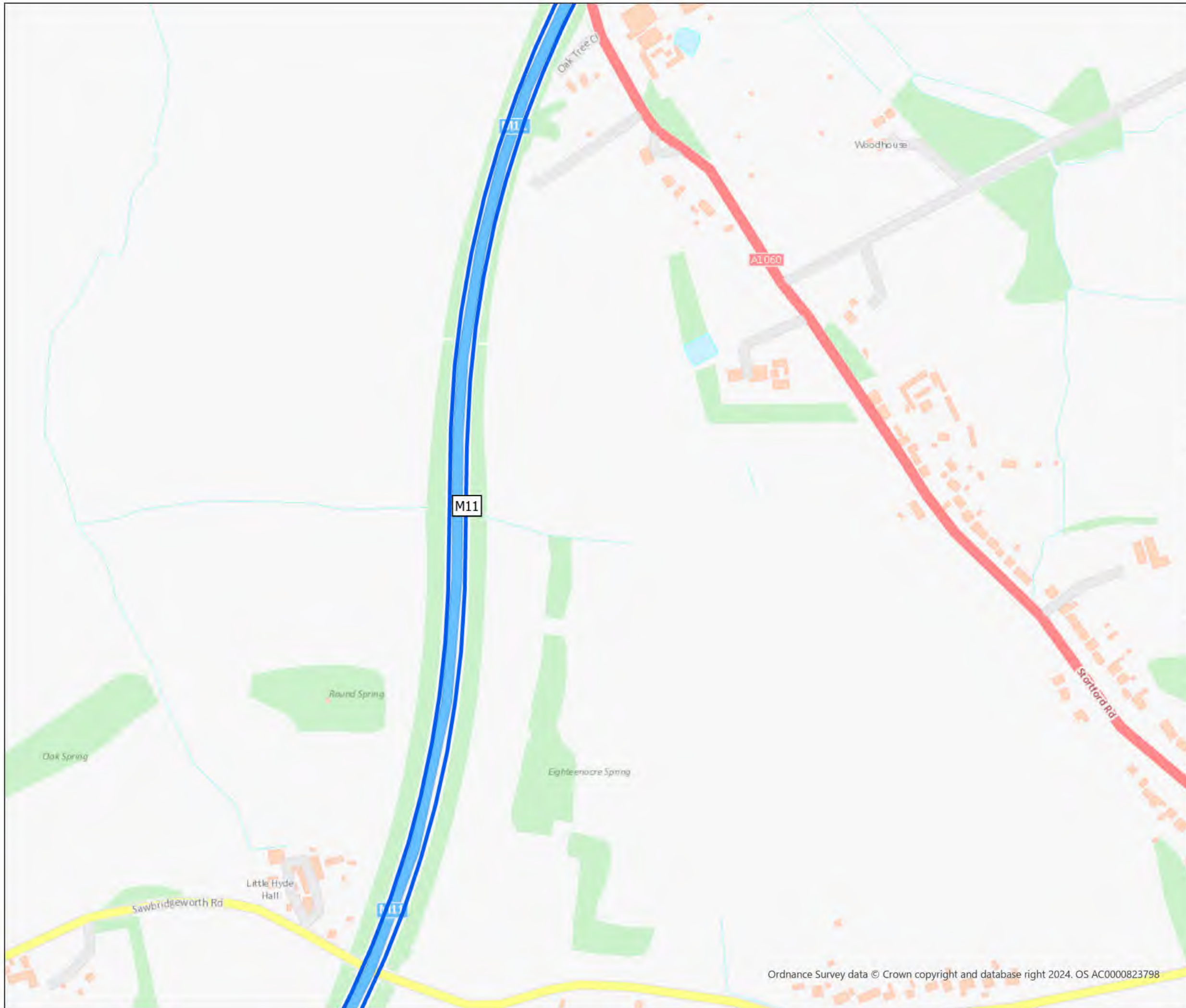
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Key:

Injunction Roads

■ covered by injunction 26/04/2024

 UK Airports

 National Highways South East Injunction Additional Parts



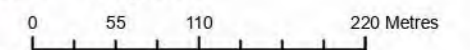
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Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
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Scale: 1:5,000



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Key:

Injunction Roads

■ covered by injunction 26/04/2024

 UK Airports

 National Highways South East Injunction Additional Parts



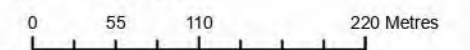
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Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

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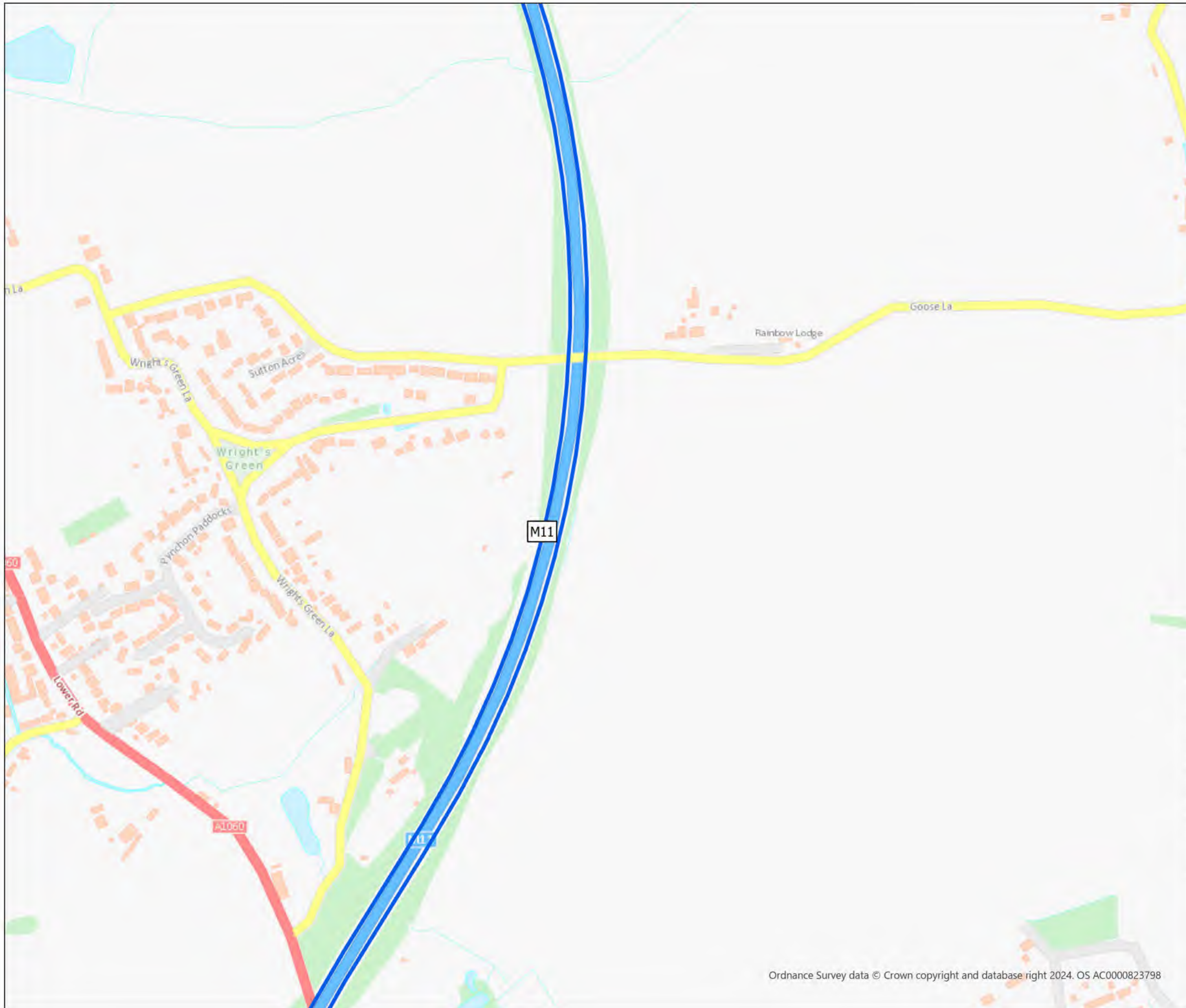
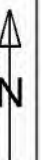


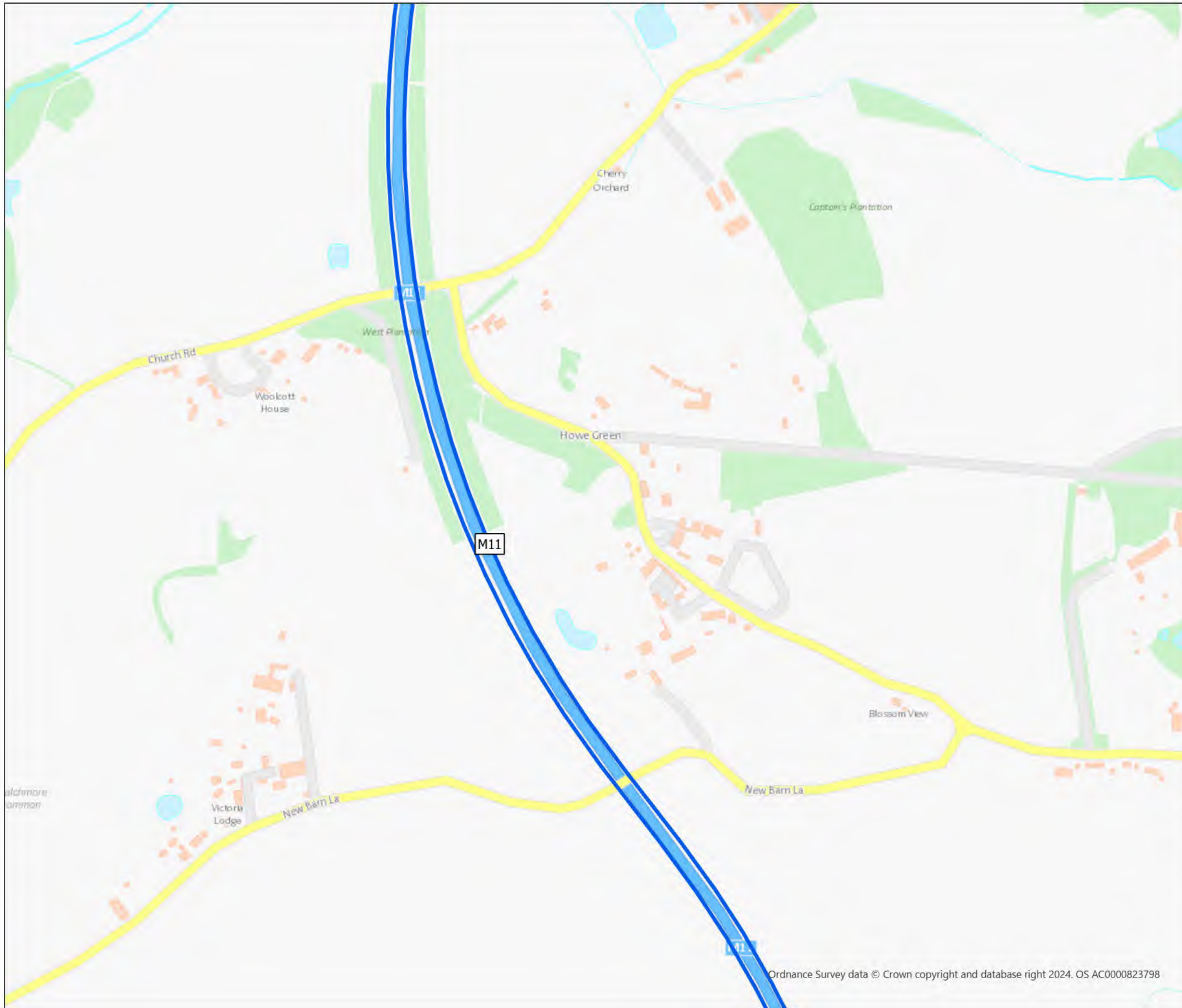
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- Key:**
- covered by injunction 26/04/2024
 - UK Airports
 - National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J7a-8

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
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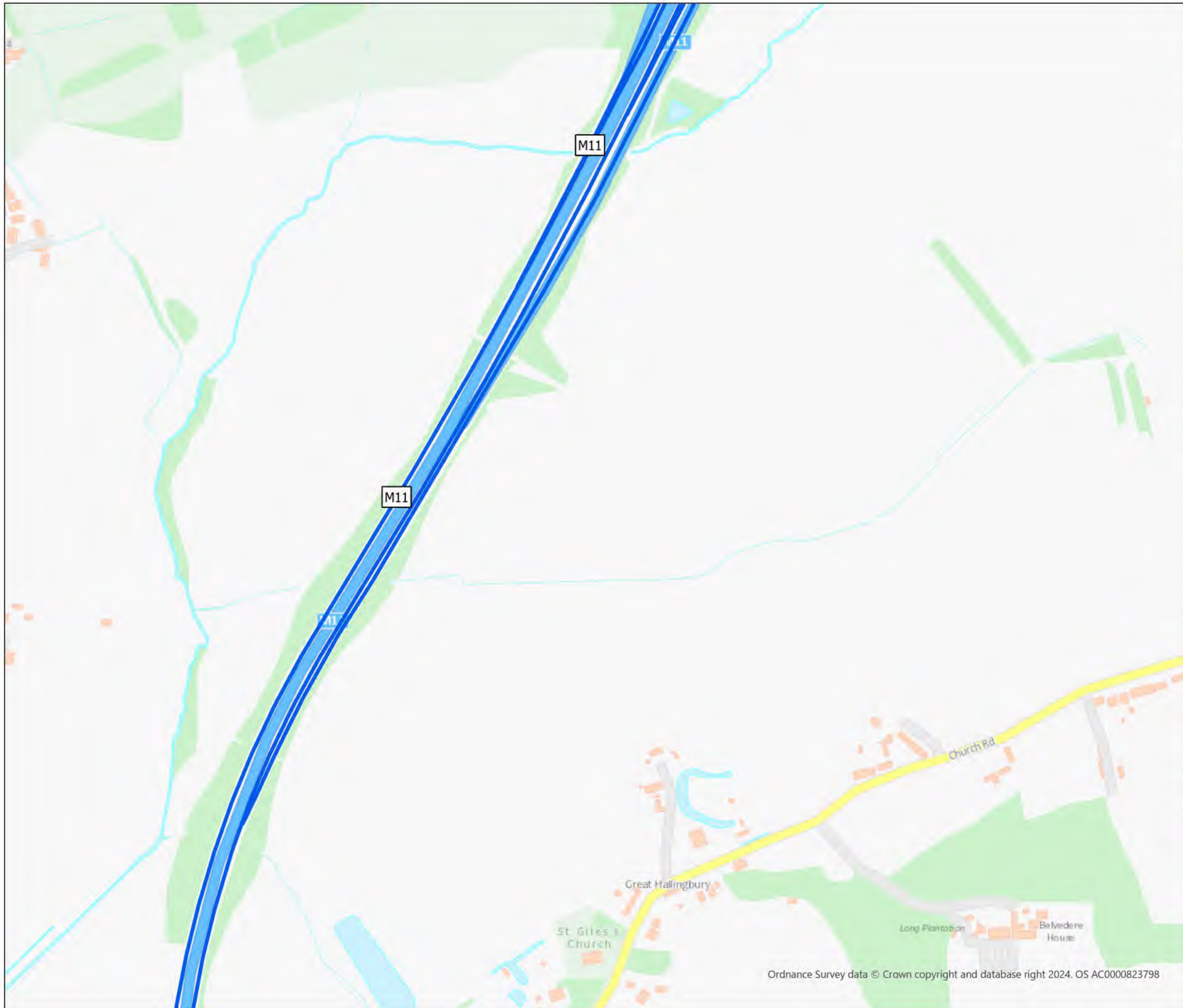
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- Key:**
- Injunction Roads
 - covered by injunction 26/04/2024
 - UK Airports
 - National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J7a-8

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

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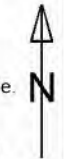
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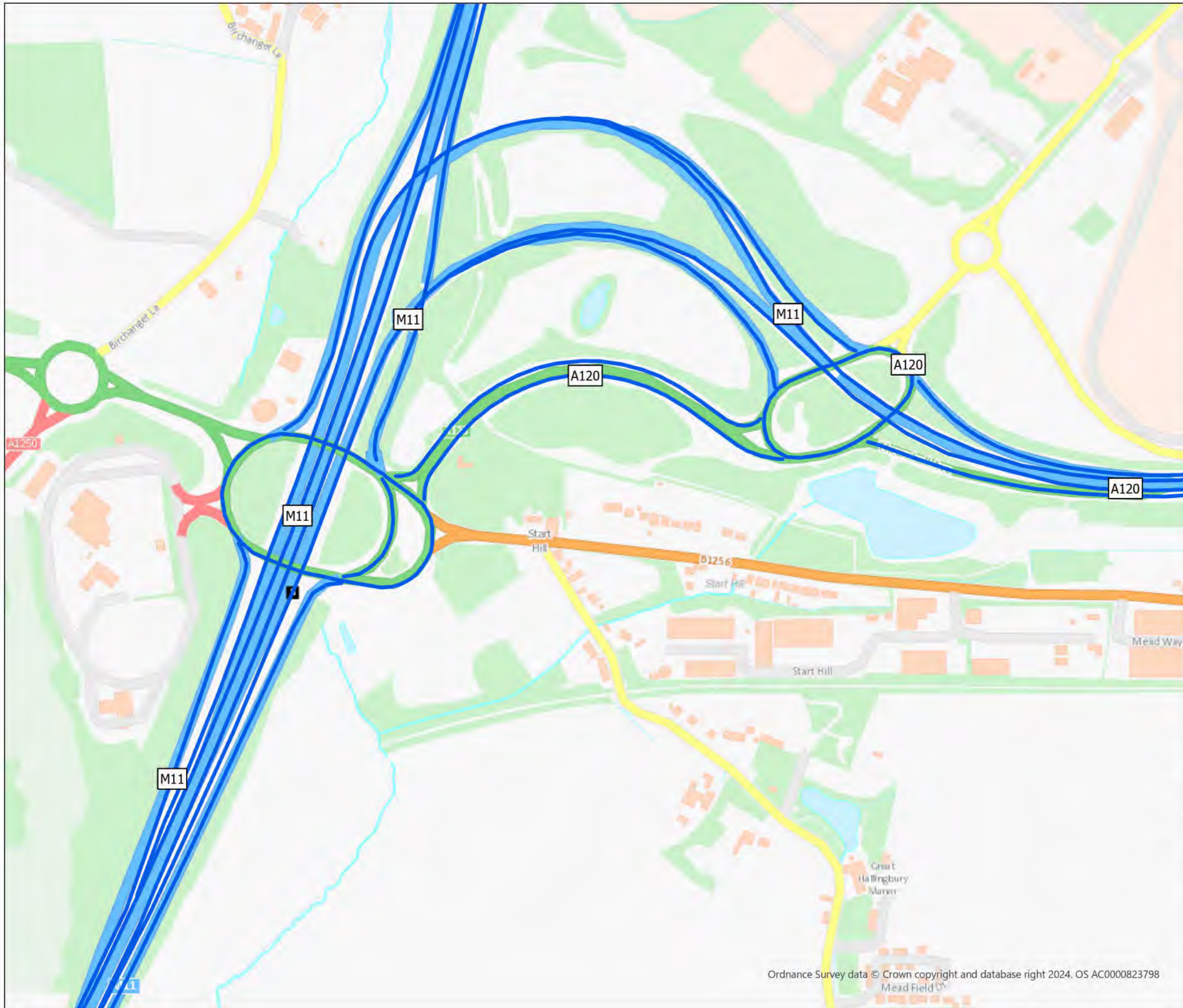
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Key:

Injunction Roads

■ covered by injunction 26/04/2024

✈ UK Airports

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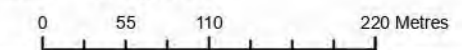
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Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

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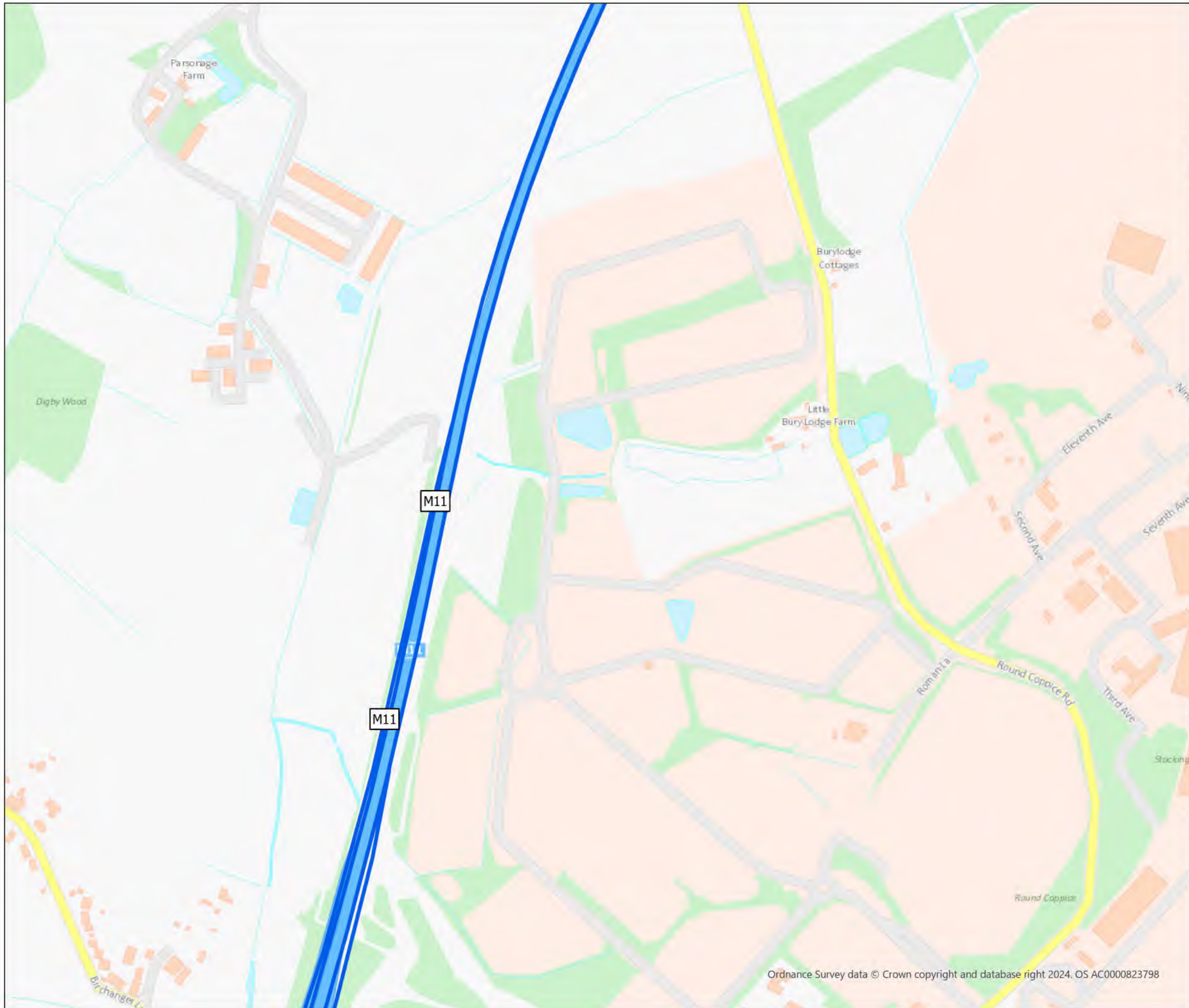
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Key:
Injunction Roads
 ■■■ covered by injunction 26/04/2024
 UK Airports
 National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J8-9

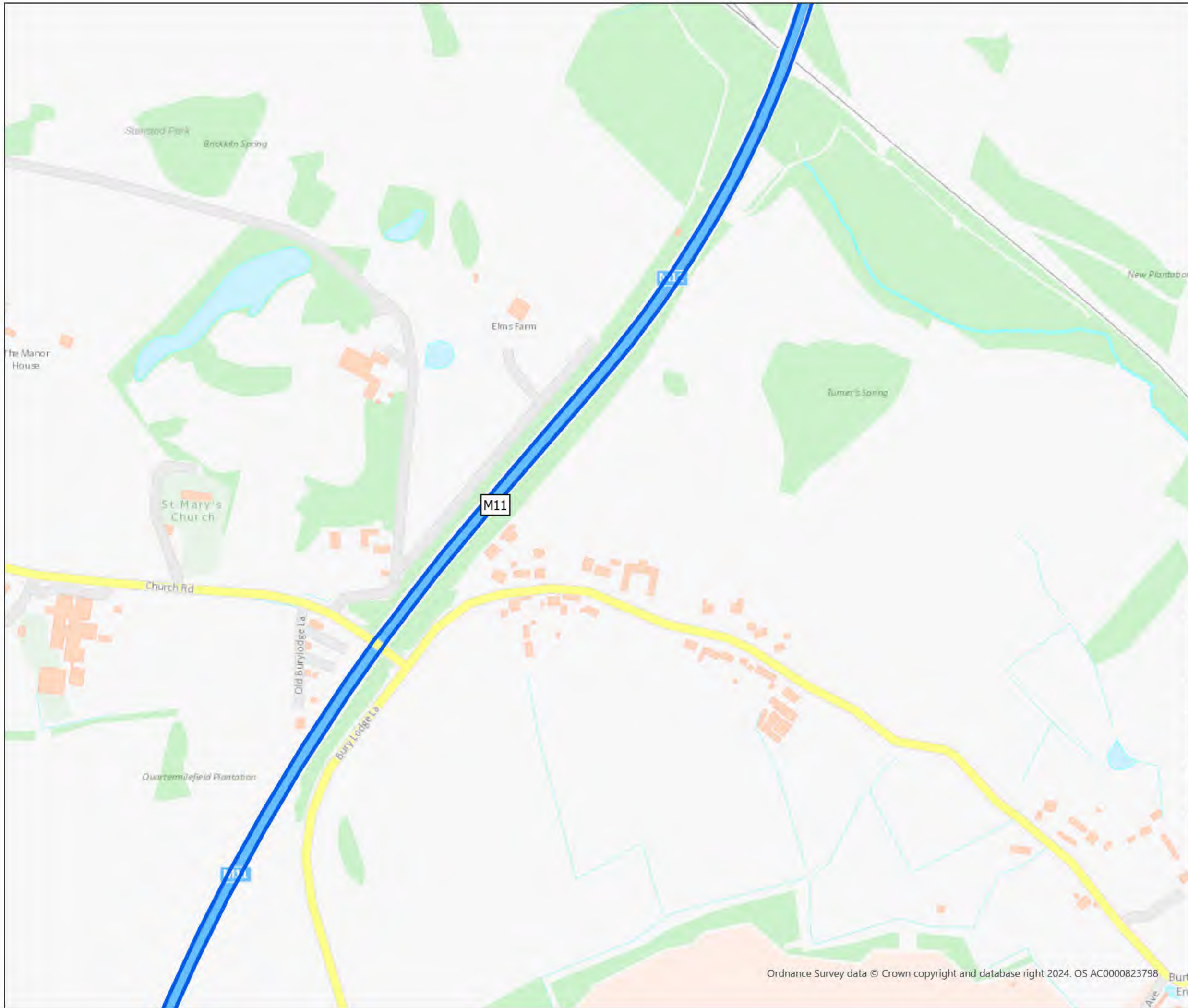
Project: N/A

Version Control: V1

Drawn By: G Phipp **Checked By:** KA
Date: 22/07/2024

Scale: 1:5,000
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Key:

Injunction Roads

- covered by injunction 26/04/2024
- ✈ UK Airports
- National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J8-9

Project: N/A

Version Control: V1

Drawn By: G Phipp **Checked By:** KA
Date: 22/07/2024

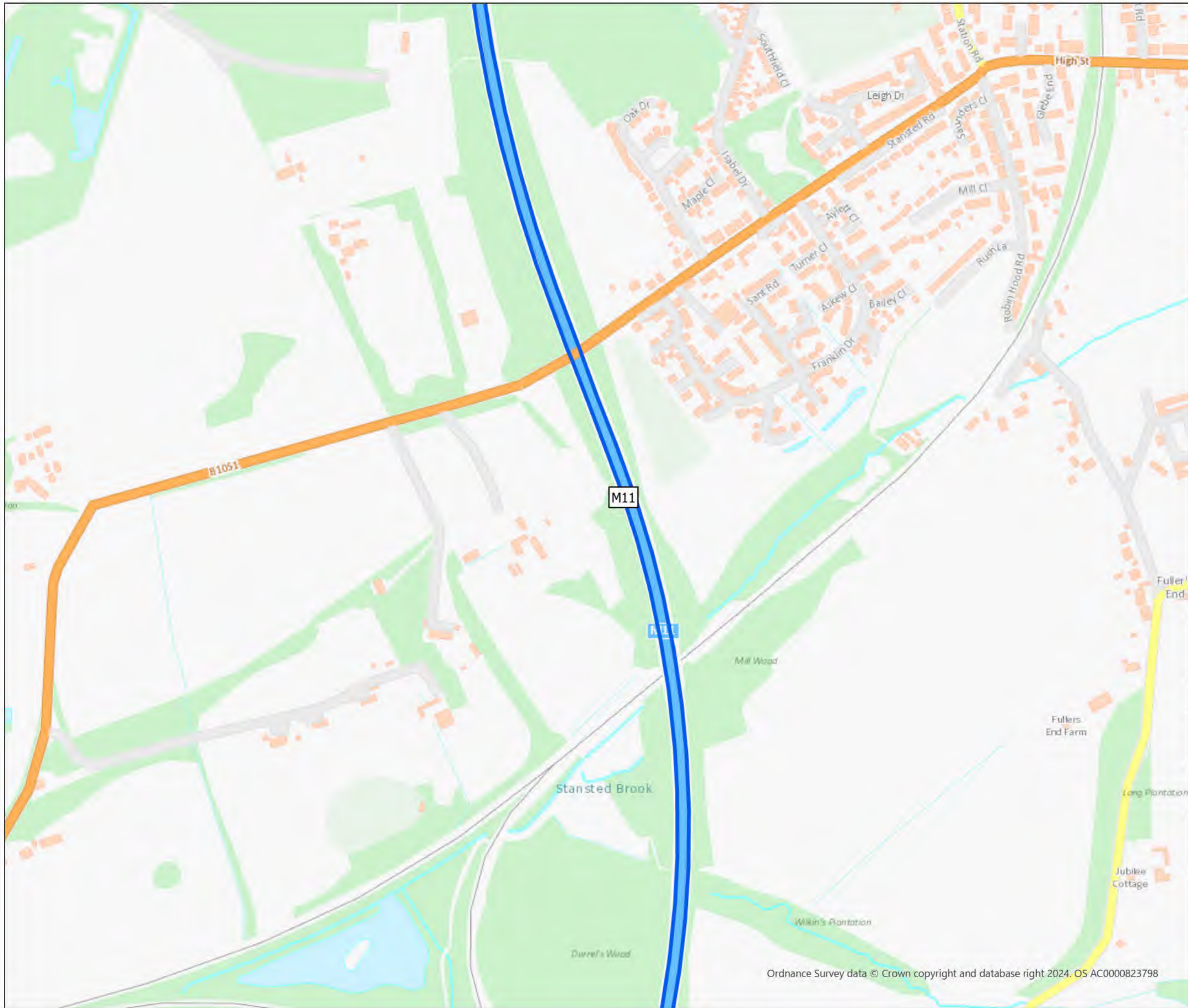
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Key:

Injunction Roads

- Red dashed line: covered by injunction 26/04/2024
- Plane icon: UK Airports
- Blue line: National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J8-9

Project: N/A

Version Control: V1

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Key:

Injunction Roads

■ covered by injunction 26/04/2024

 UK_Airports

 National Highways South East Injunction Additional Parts



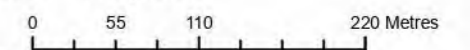
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Project: N/A

Version Control: V1

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Date: 22/07/2024

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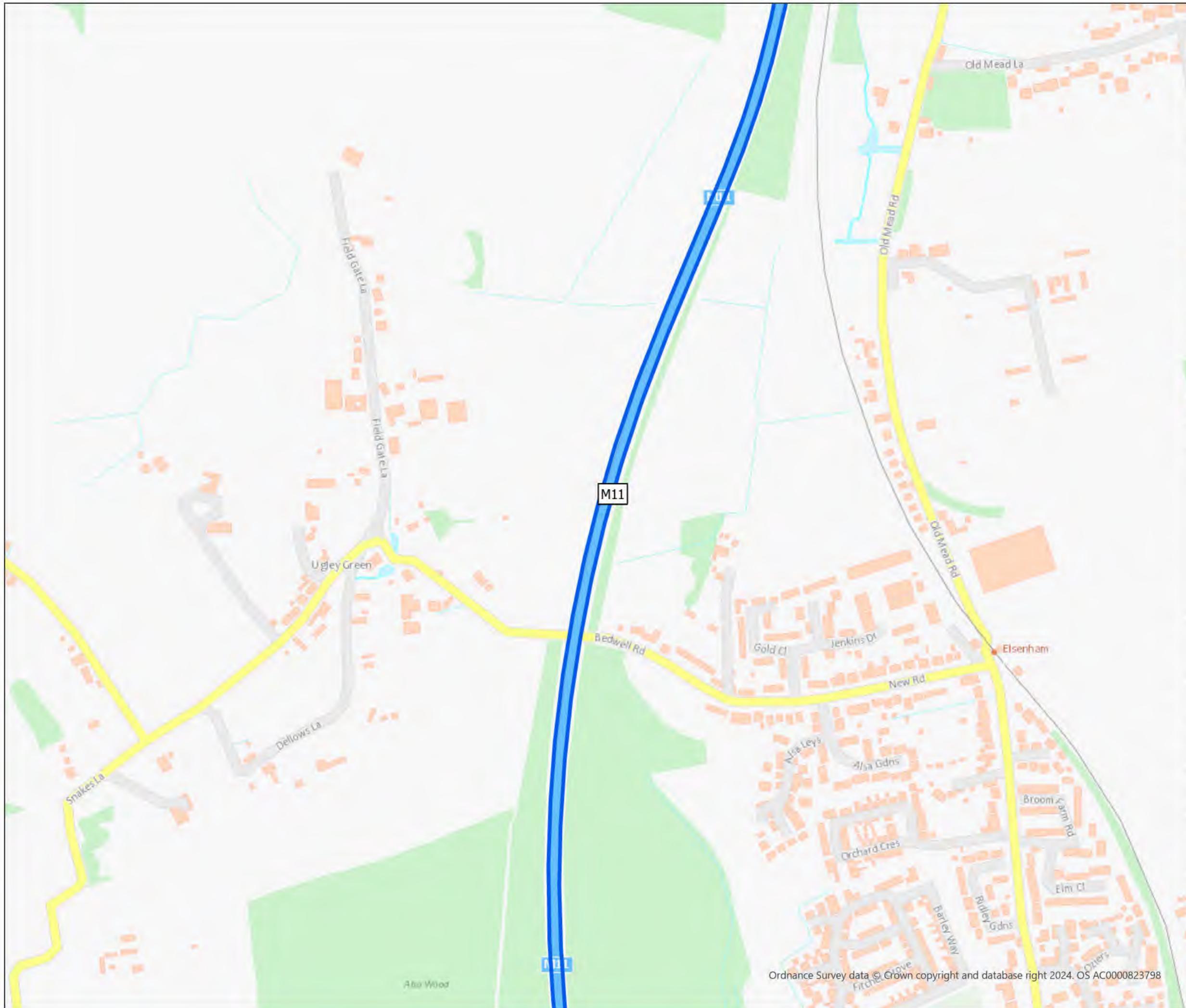
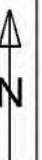


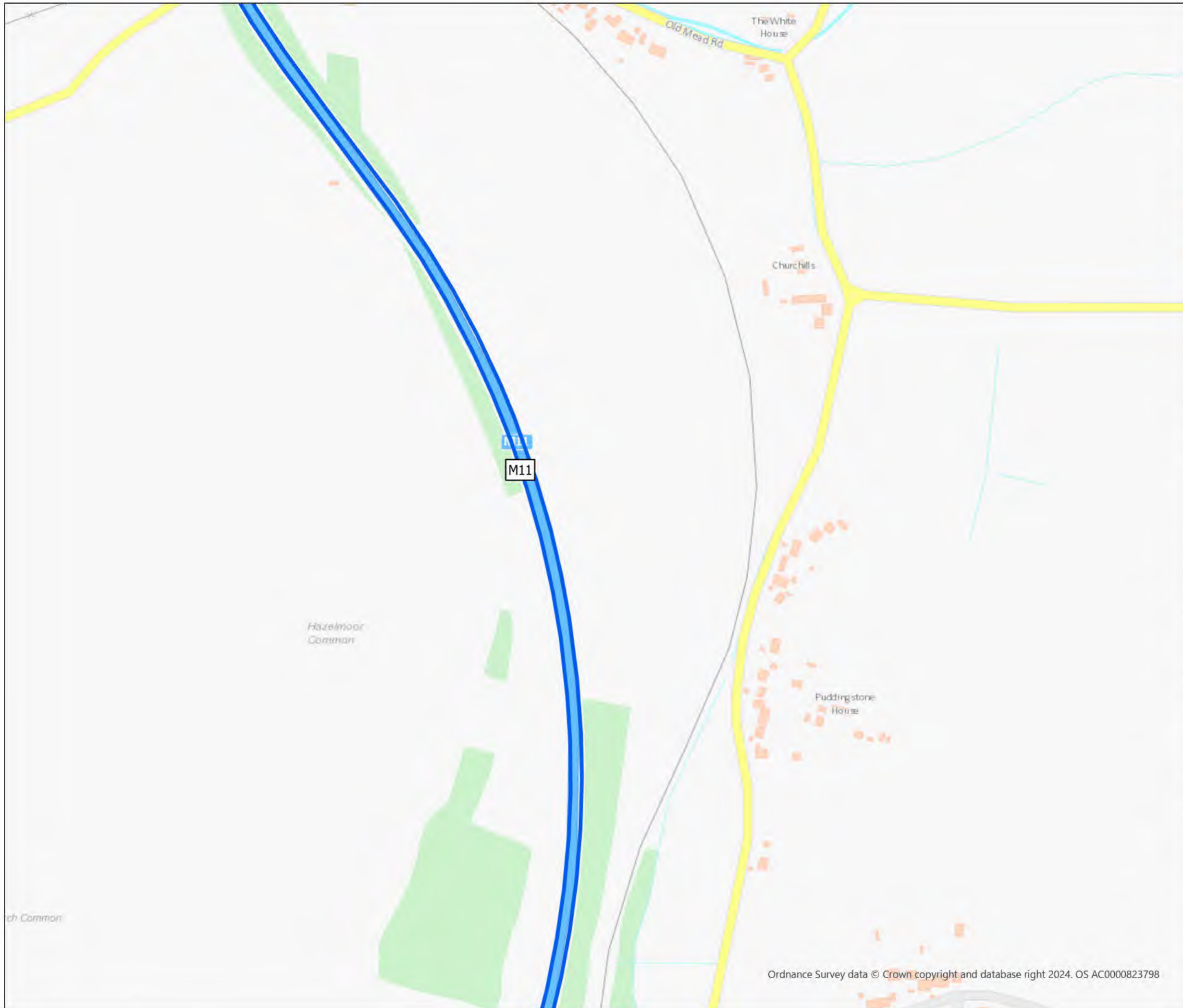
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Key:

Injunction Roads

■ covered by injunction 26/04/2024



UK Airports

— National Highways South East Injunction Additional Parts



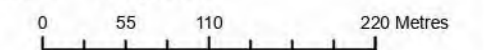
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Project: N/A

Version Control: V1

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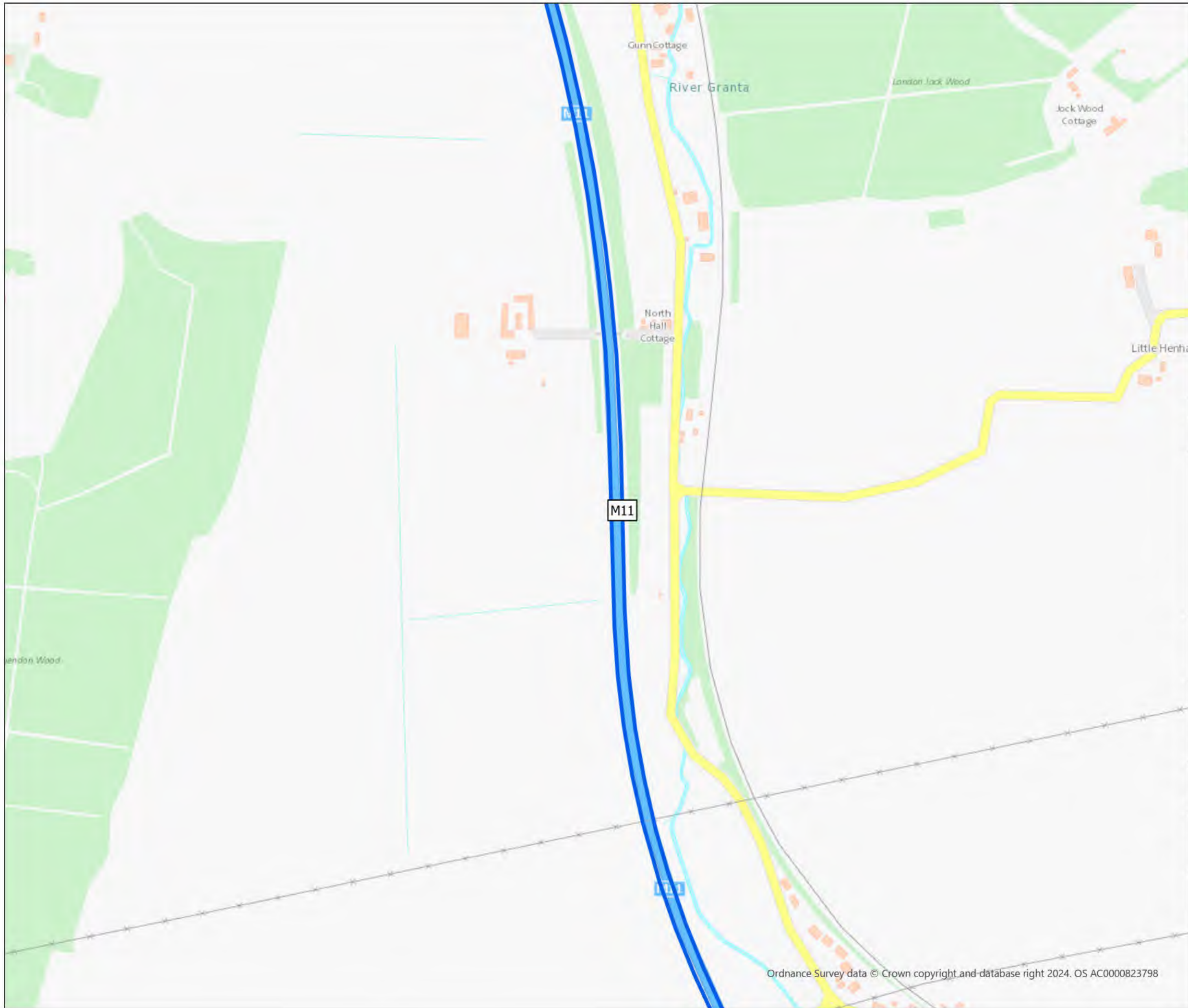
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Key:
Injunction Roads
 ■■■ covered by injunction 26/04/2024
 UK Airports
 National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J8-9

Project: N/A

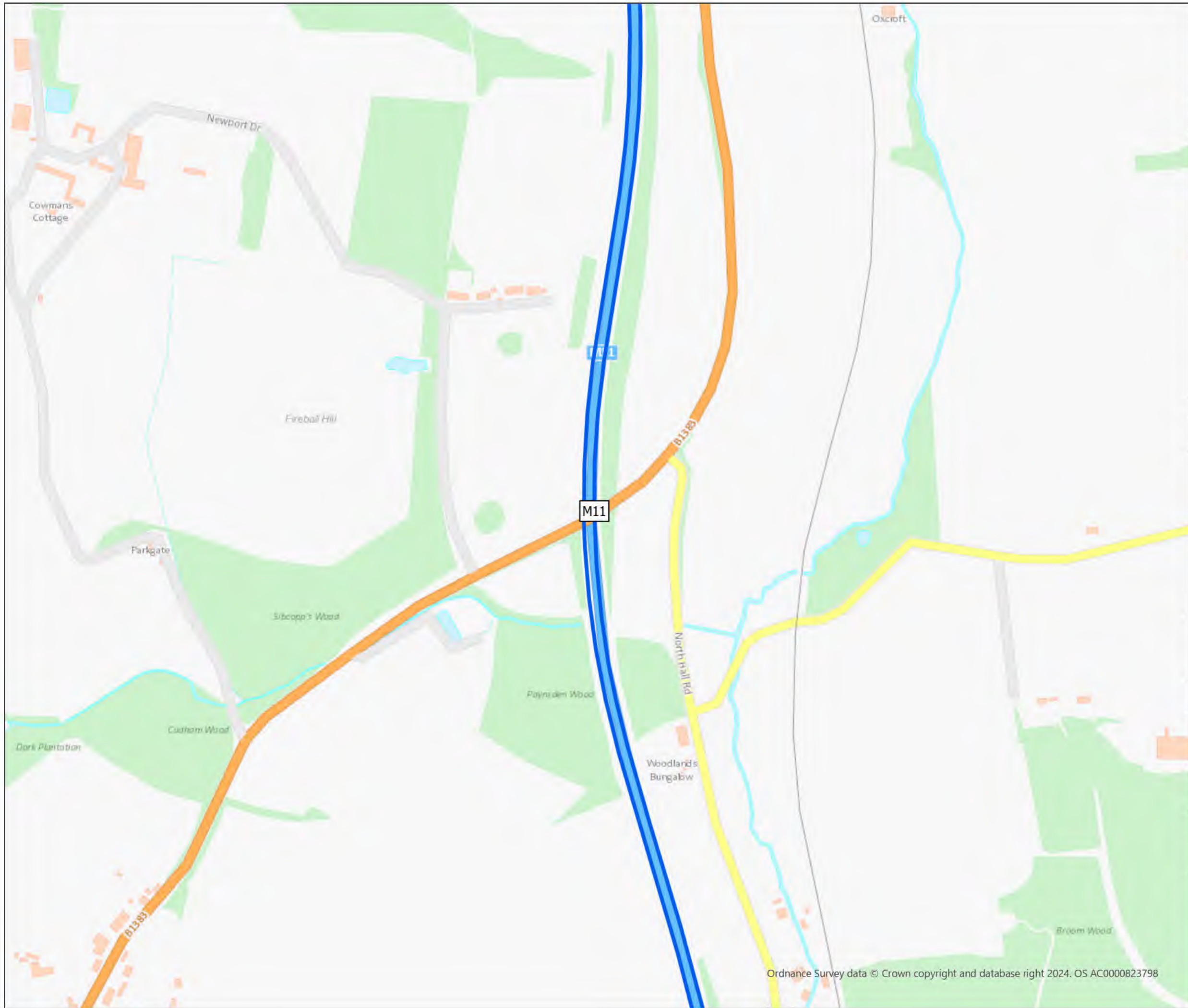
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 - National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J8-9

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

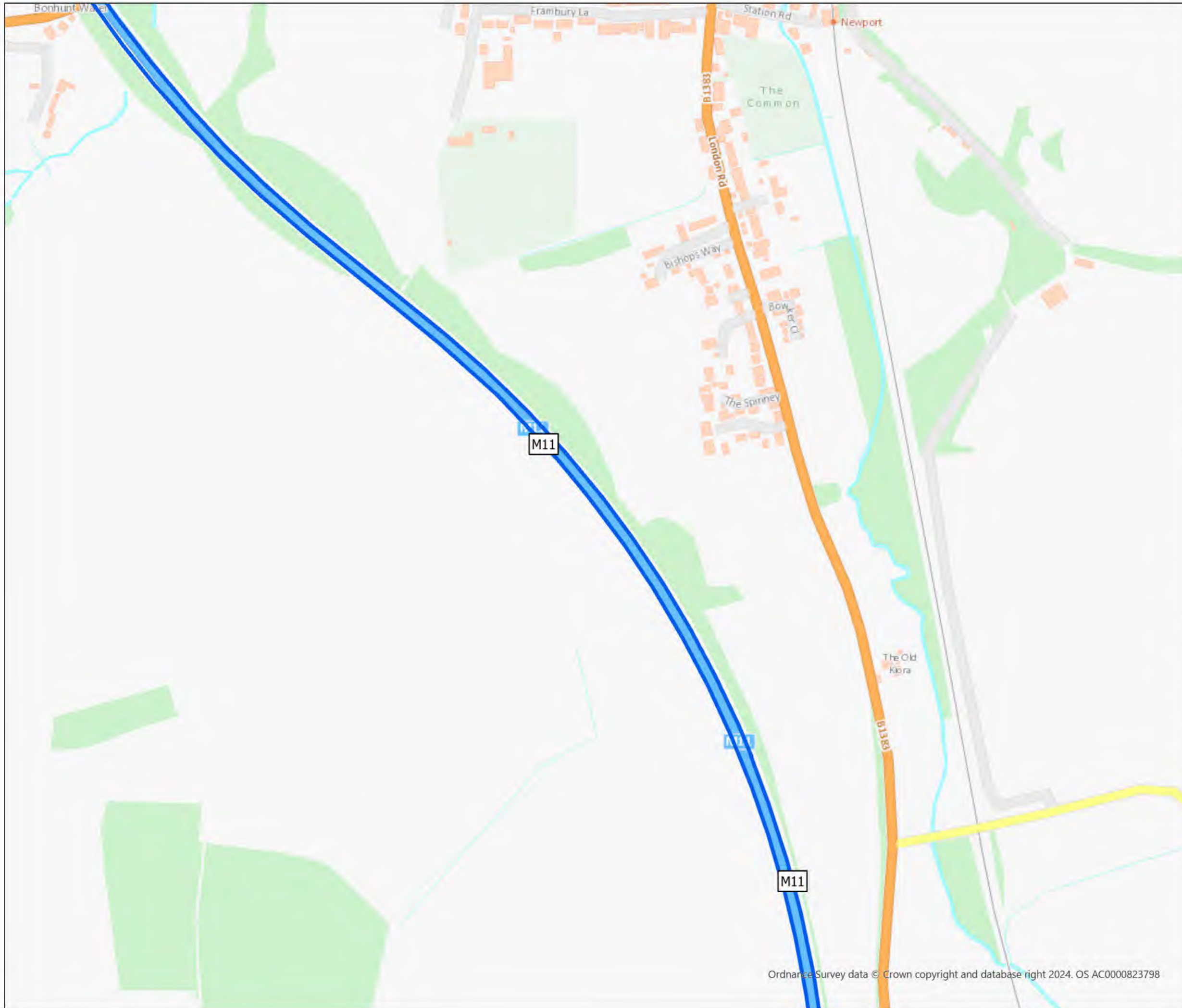
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- Key:**
- covered by injunction 26/04/2024
 - UK Airports
 - National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J8-9

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

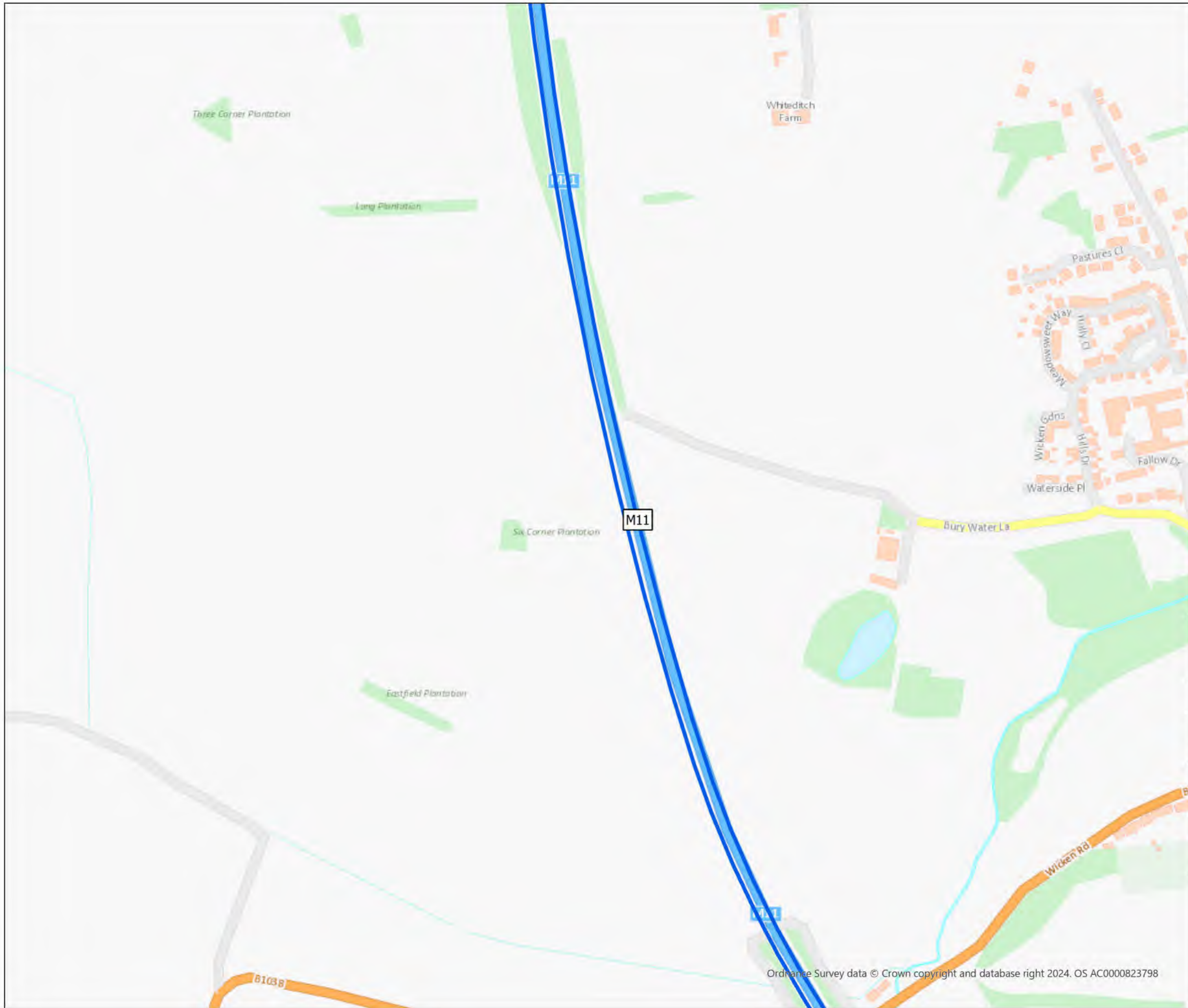
Scale: 1:5,000

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Key:

Injunction Roads

- Red dashed line: covered by injunction 26/04/2024
- Airplane icon: UK Airports
- Blue line: National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J8-9

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

Scale: 1:5,000

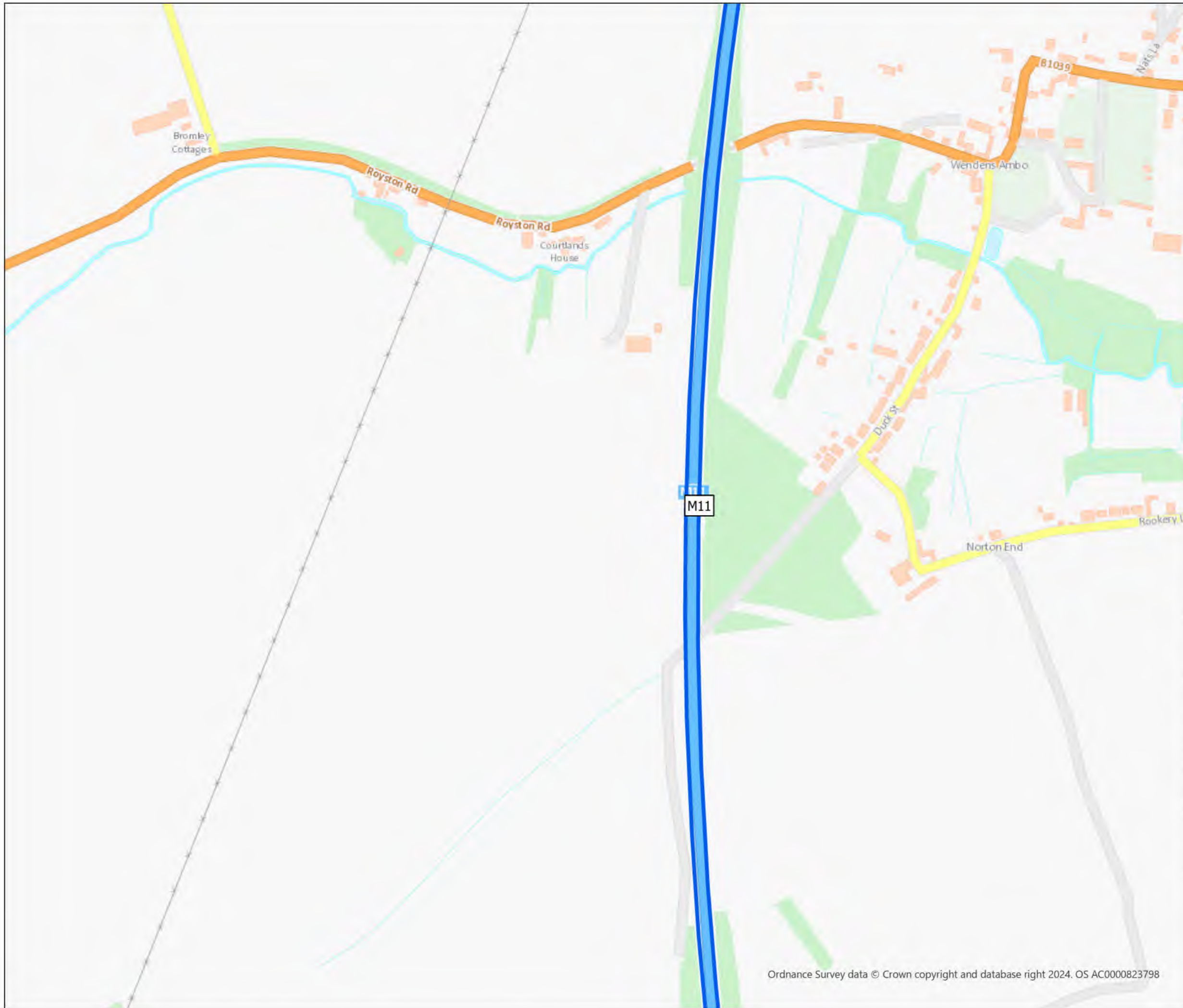
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Key:
Injunction Roads
 ■ covered by injunction 26/04/2024
 ✈ UK Airports
 — National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J8-9

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
 Date: 22/07/2024

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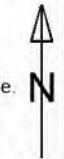
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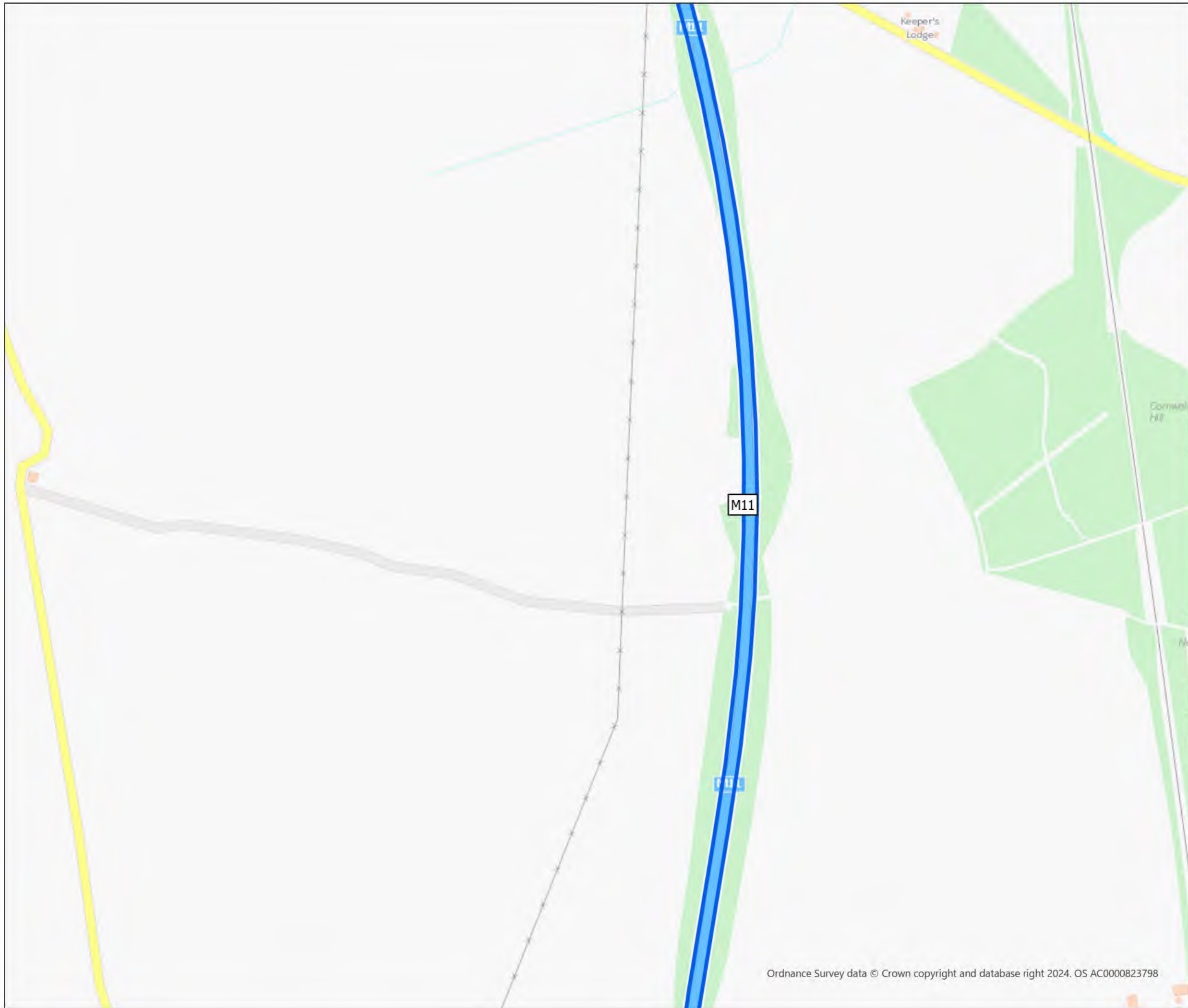
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- Key:**
- Injunction Roads**
- covered by injunction 26/04/2024
 - ✈ UK Airports
 - National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J8-9

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

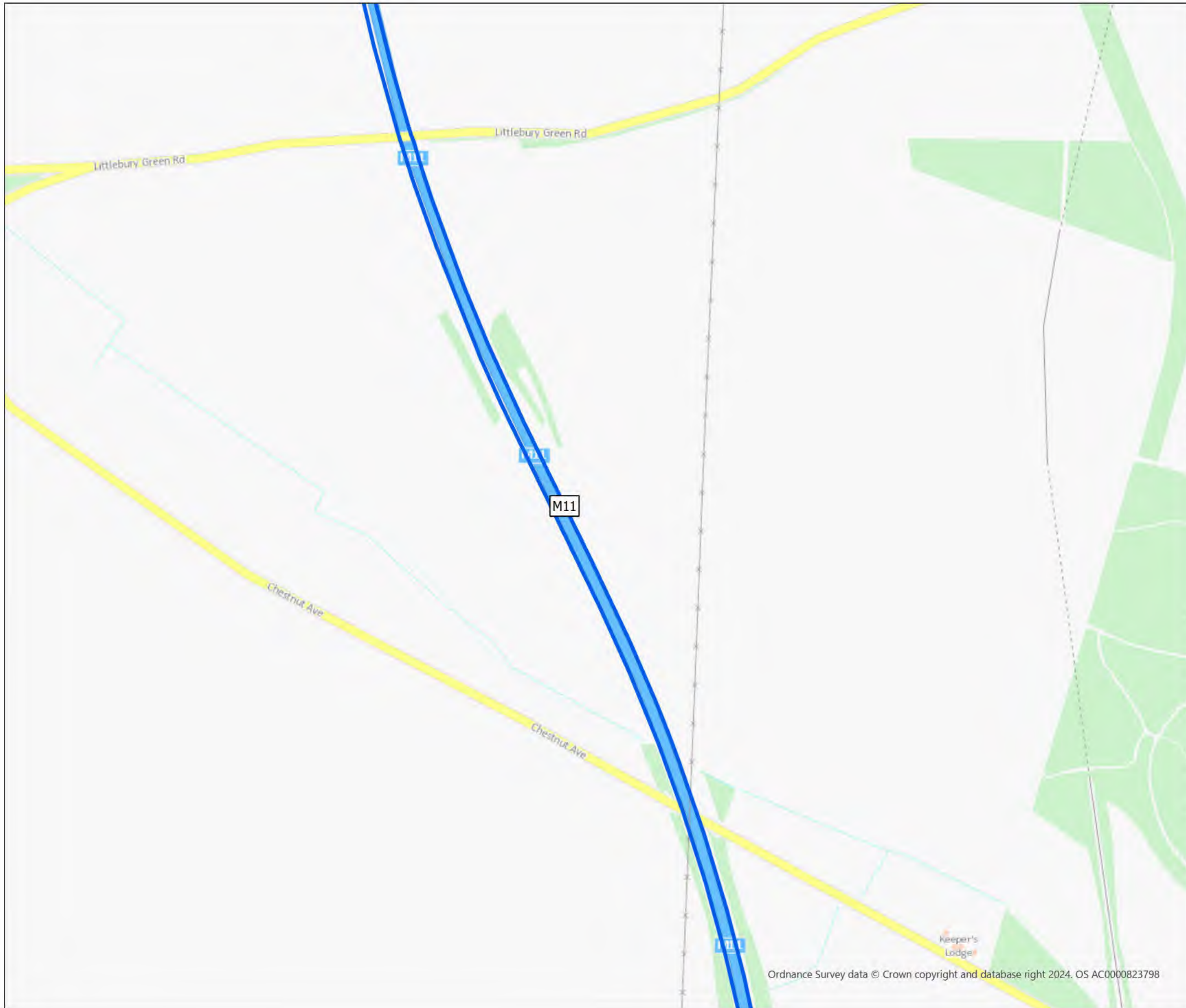
Scale: 1:5,000

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Key:

Injunction Roads

••• covered by injunction 26/04/2024

 UK Airports

 National Highways South East Injunction Additional Parts



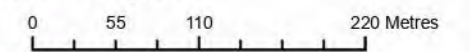
Title: Strategic Road Network - M11 J8-9

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

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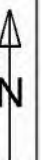


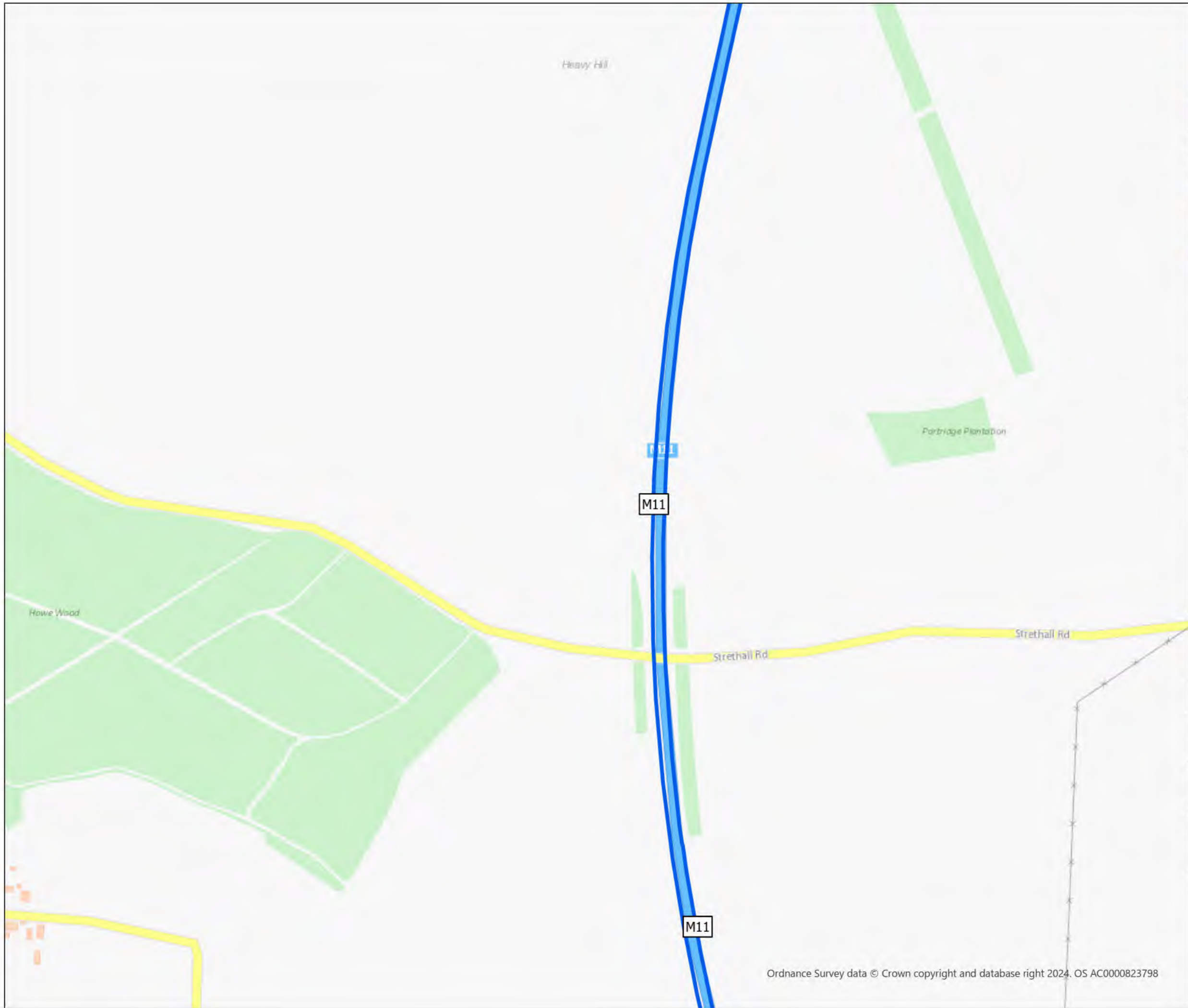
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Key:

Injunction Roads

- covered by injunction 26/04/2024
- ✈ UK Airports
- National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J8-9

Project: N/A

Version Control: V1

Drawn By: G Phipp **Checked By:** KA
Date: 22/07/2024

Scale: 1:5,000

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M11


M11

Key:

Injunction Roads

■ covered by injunction 26/04/2024

 UK Airports

 National Highways South East Injunction Additional Parts



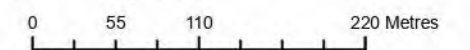
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Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

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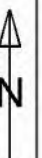


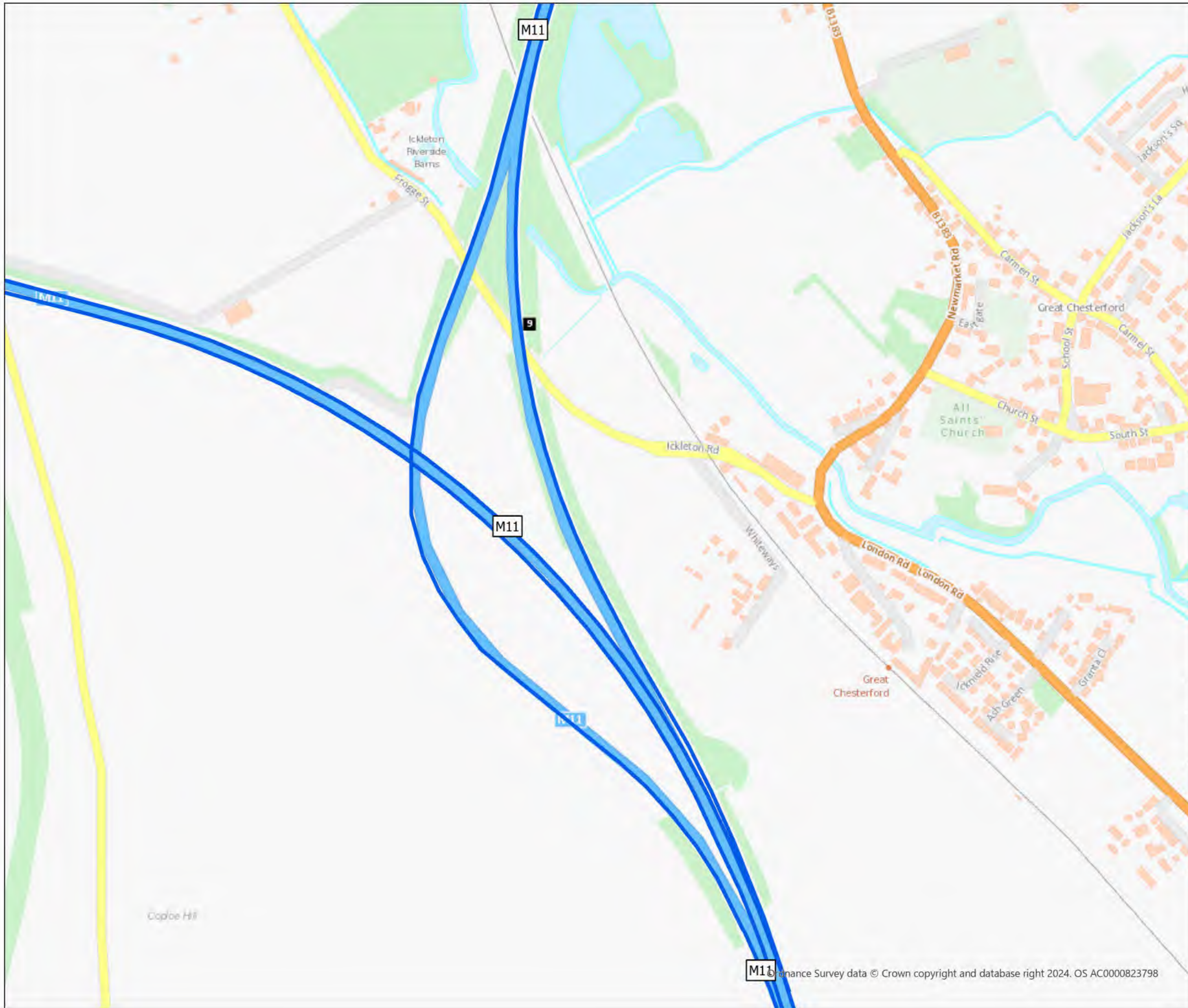
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Key:

Injunction Roads

- Red square: covered by injunction 26/04/2024
- Airplane icon: UK Airports
- Blue line: National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J9

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 23/07/2024

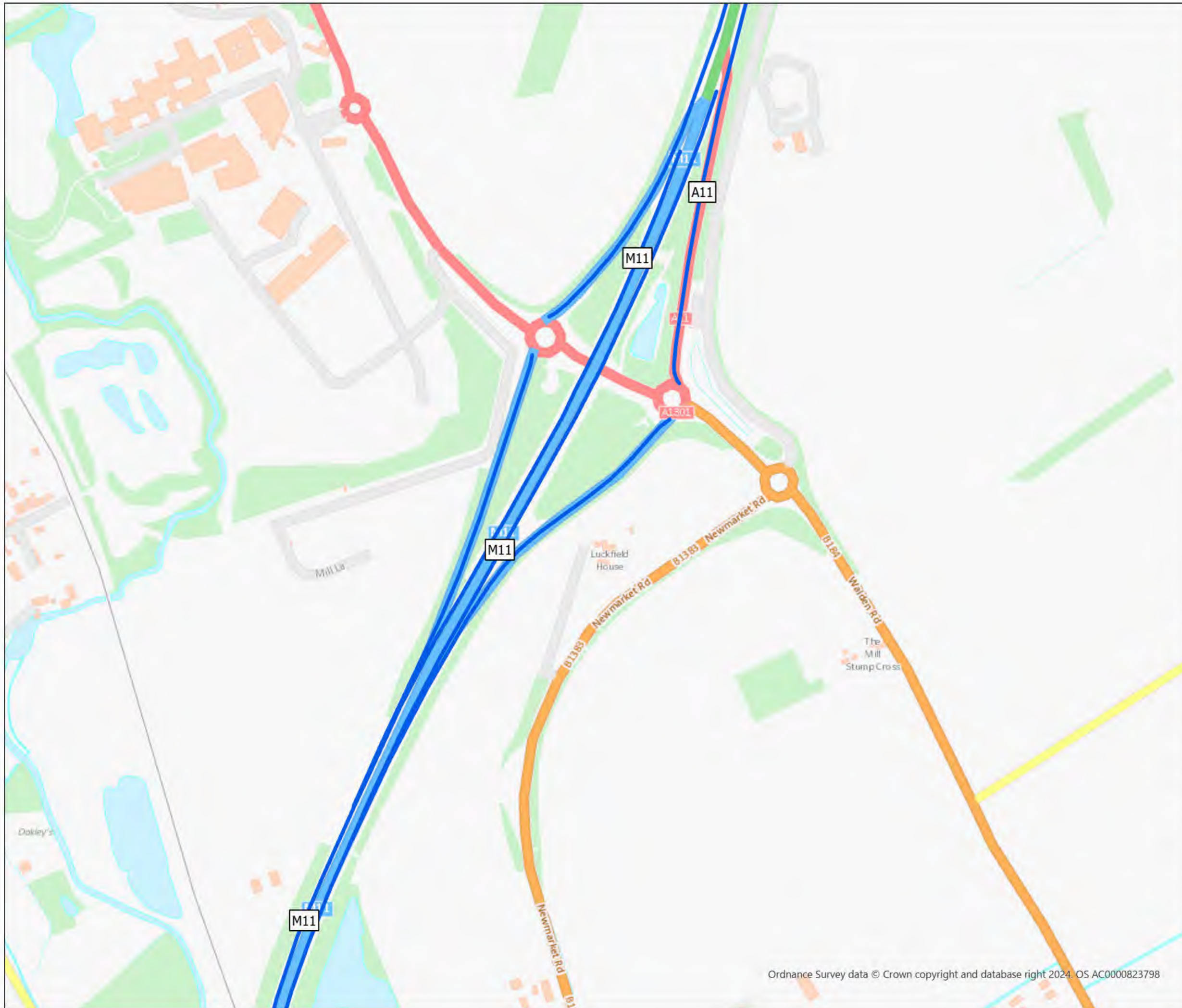
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- Key:**
- **Injunction Roads**
● covered by injunction 26/04/2024
 - UK Airports
 - National Highways South East Injunction Additional Parts



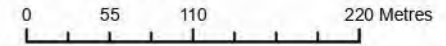
Title: Strategic Road Network - M11 J9

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
 Date: 22/07/2024

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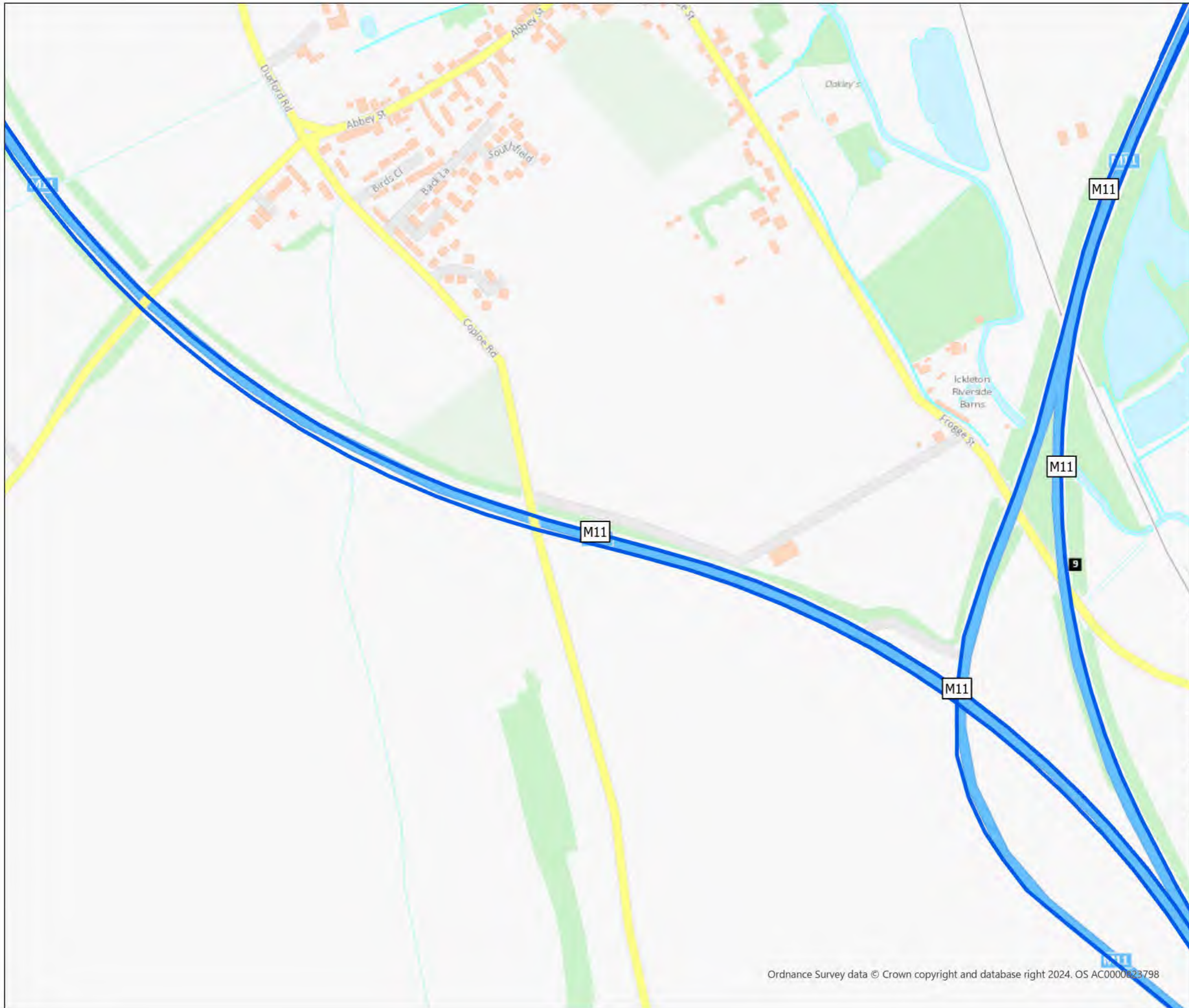
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Key:

Injunction Roads

- covered by injunction 26/04/2024
- ✈ UK Airports
- National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J9-10

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 23/07/2024

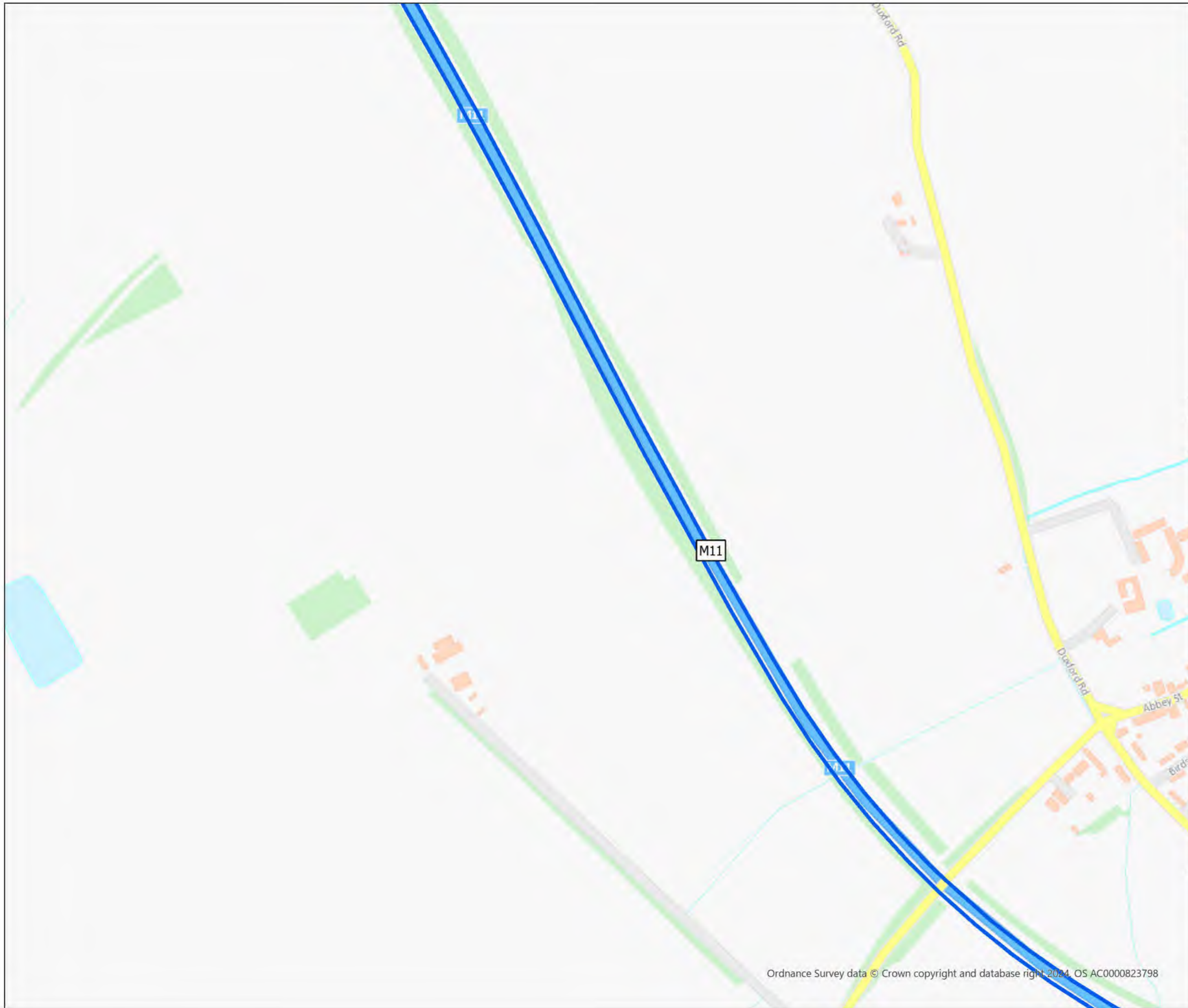
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Key:

Injunction Roads

- covered by injunction 26/04/2024
- ✈ UK_Airports
- National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J9-10

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 23/07/2024

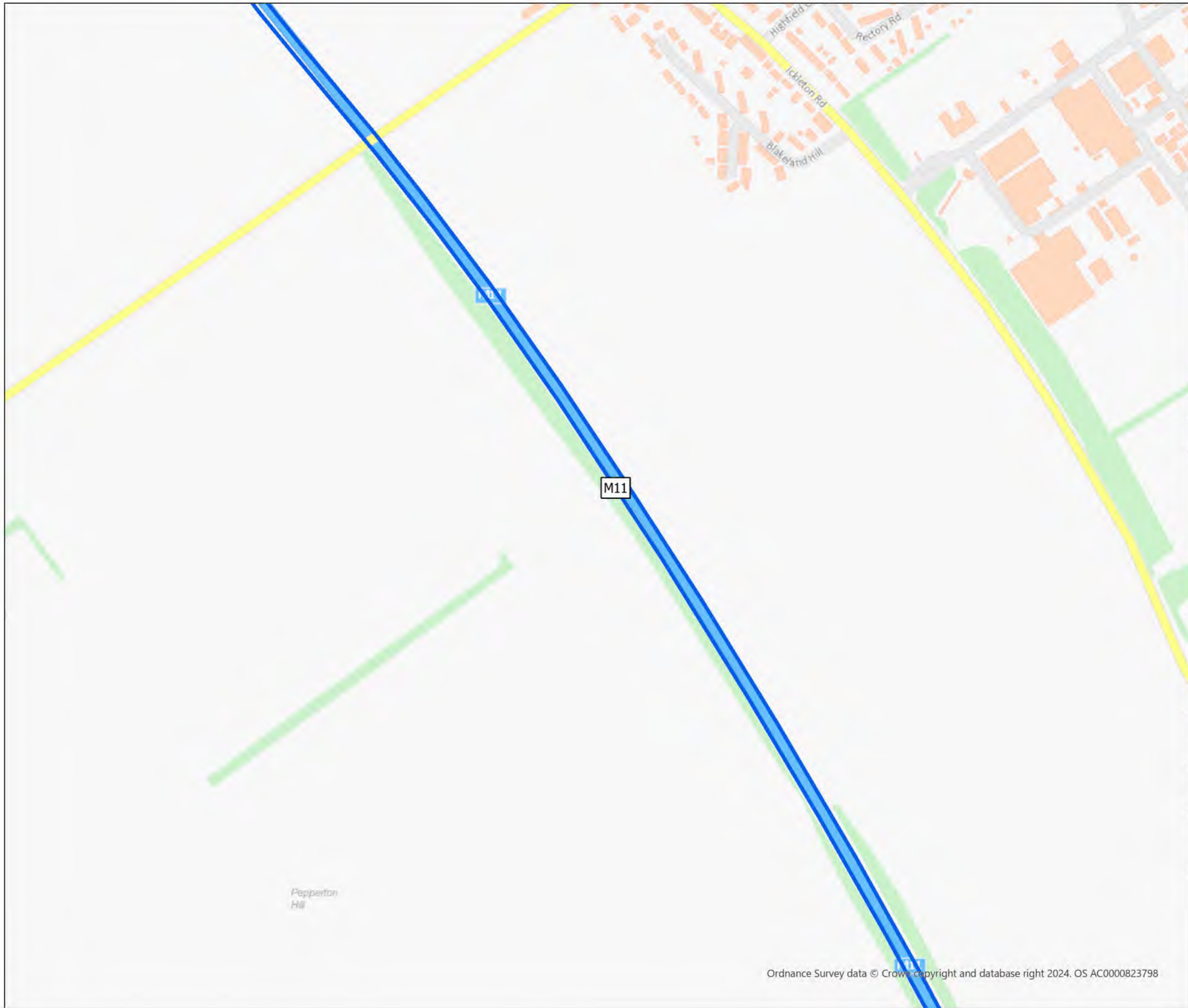
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Key:

Injunction Roads

- covered by injunction 26/04/2024
- ✈ UK_Airports
- National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J9-10

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 23/07/2024

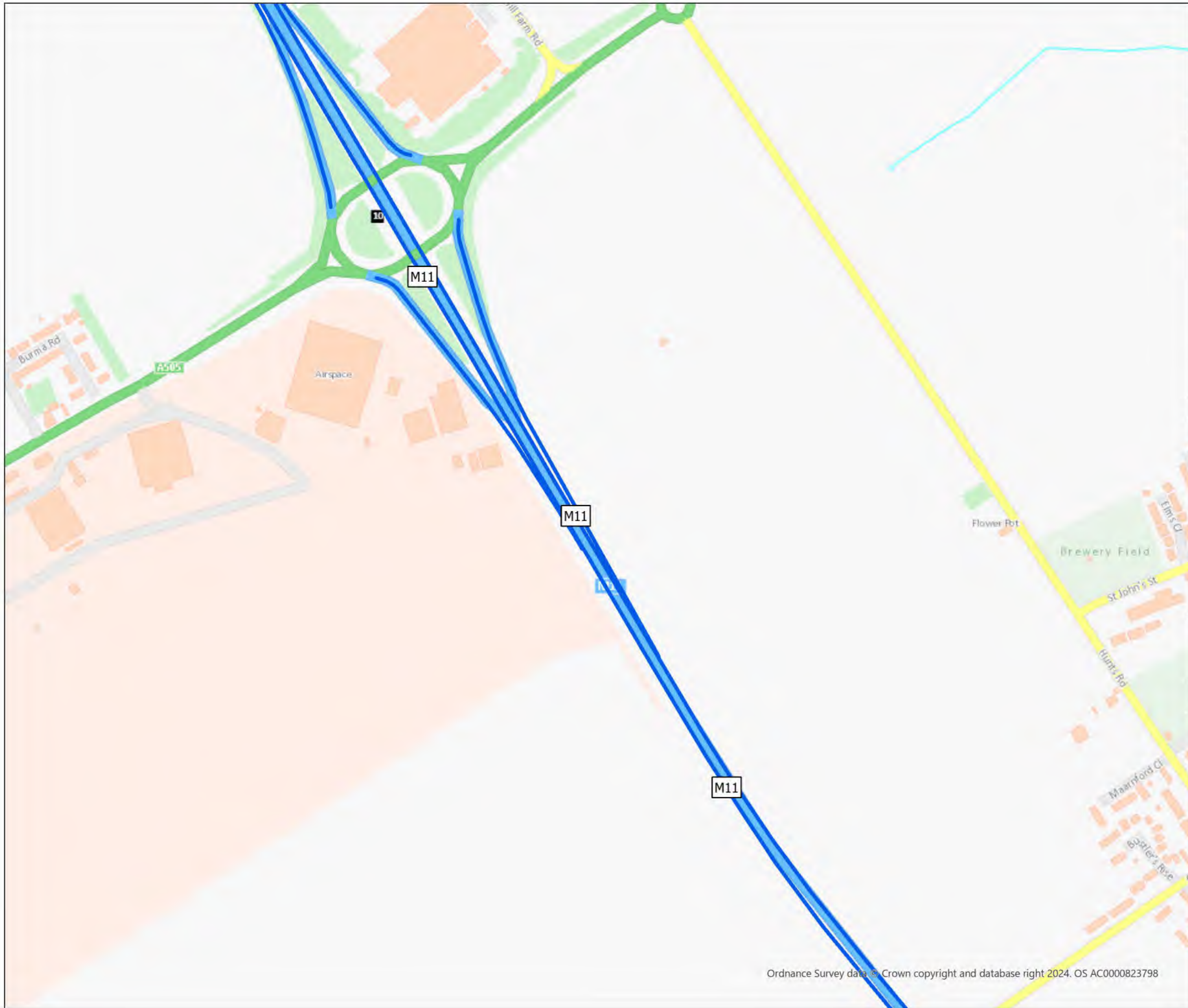
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Key:
Injunction Roads
 ■ covered by injunction 26/04/2024
 ✈ UK_Airports
 — National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J9-10


Project: N/A

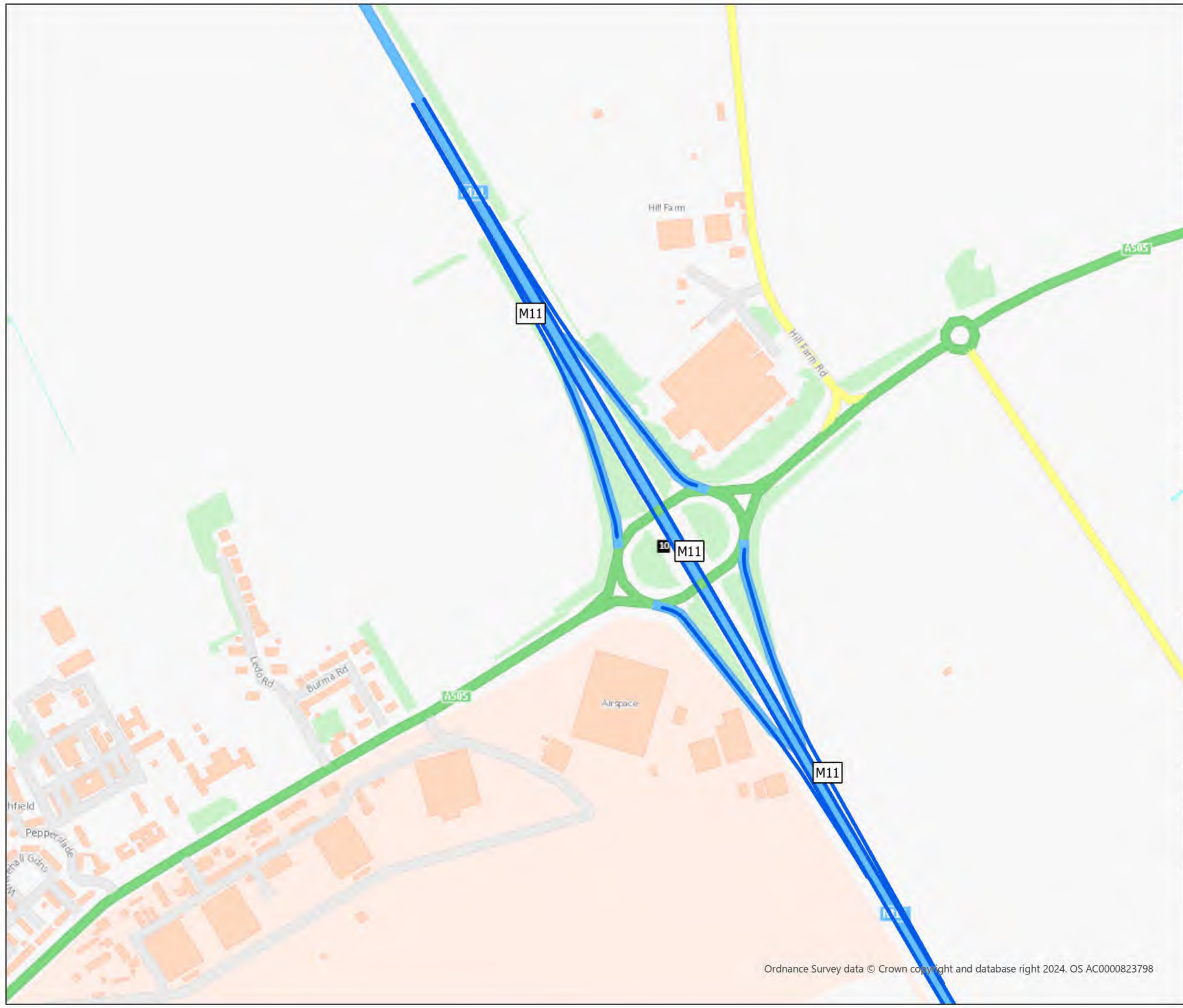
Version Control: V1

Drawn By: G Phipp **Checked By:** KA
Date: 23/07/2024

Scale: 1:5,000
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Key:

Injunction Roads

- covered by injunction 26/04/2024
- ✈ UK_Airports
- National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J10

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 23/07/2024

Scale: 1:5,000

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Key:

Injunction Roads

■ covered by injunction 26/04/2024

 UK Airports

 National Highways South East Injunction Additional Parts



Title: Strategic Road Network - M11 J8 A120

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 23/07/2024

Scale: 1:5,000

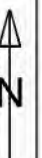
0 0.05 0.1 0.2 Kilometers

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Key:

Injunction Roads

■ covered by injunction 26/04/2024

 UK Airports

 National Highways South East Injunction Additional Parts



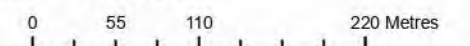
Title: Strategic Road Network - M11 J8-A120

Project: N/A

Version Control: V1

Drawn By: G Phipp **Checked By:** KA
Date: 22/07/2024

Scale: 1:5,000



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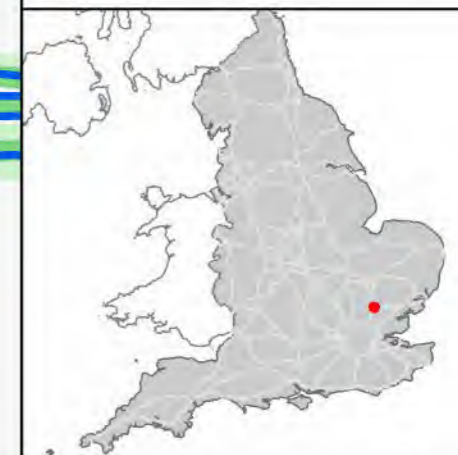
Key:

Injunction Roads

■ covered by injunction 26/04/2024

 UK Airports

 National Highways South East Injunction Additional Parts



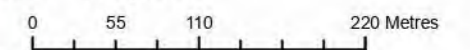
Title: Strategic Road Network - A120-Stansted Airport Junction

Project: N/A

Version Control: V1

Drawn By: G Phipp **Checked By:** KA
Date: 22/07/2024

Scale: 1:5,000



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Key:

Injunction Roads

■ covered by injunction 26/04/2024

 UK Airports

 National Highways South East Injunction Additional Parts



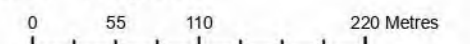
Title: Strategic Road Network - A120-Stansted Airport Junction

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

Scale: 1:5,000

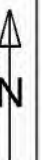


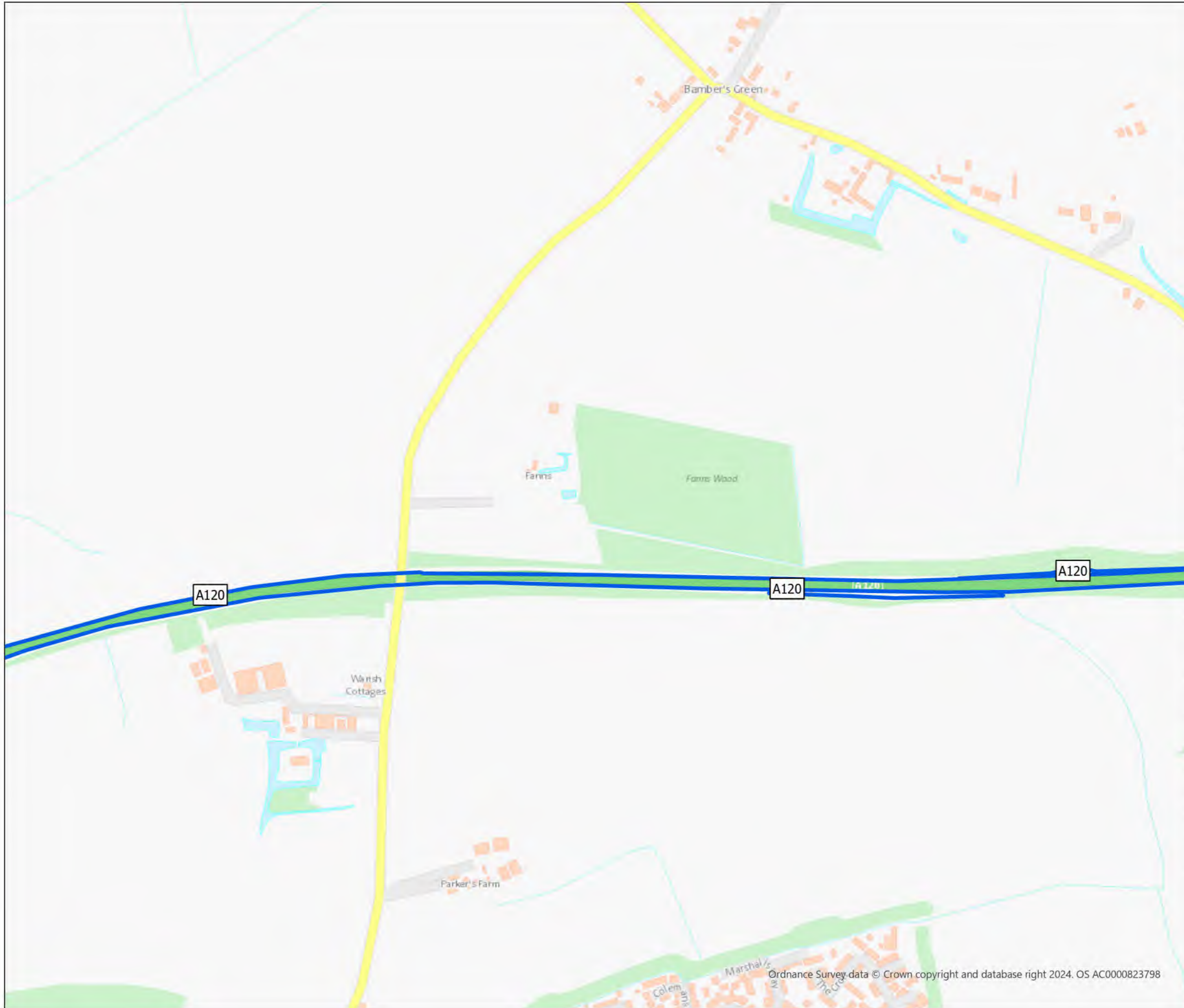
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Key:

Injunction Roads

■ covered by injunction 26/04/2024

 UK Airports

 National Highways South East Injunction Additional Parts



Title: Strategic Road Network - A120

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

Scale: 1:5,000

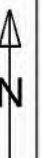


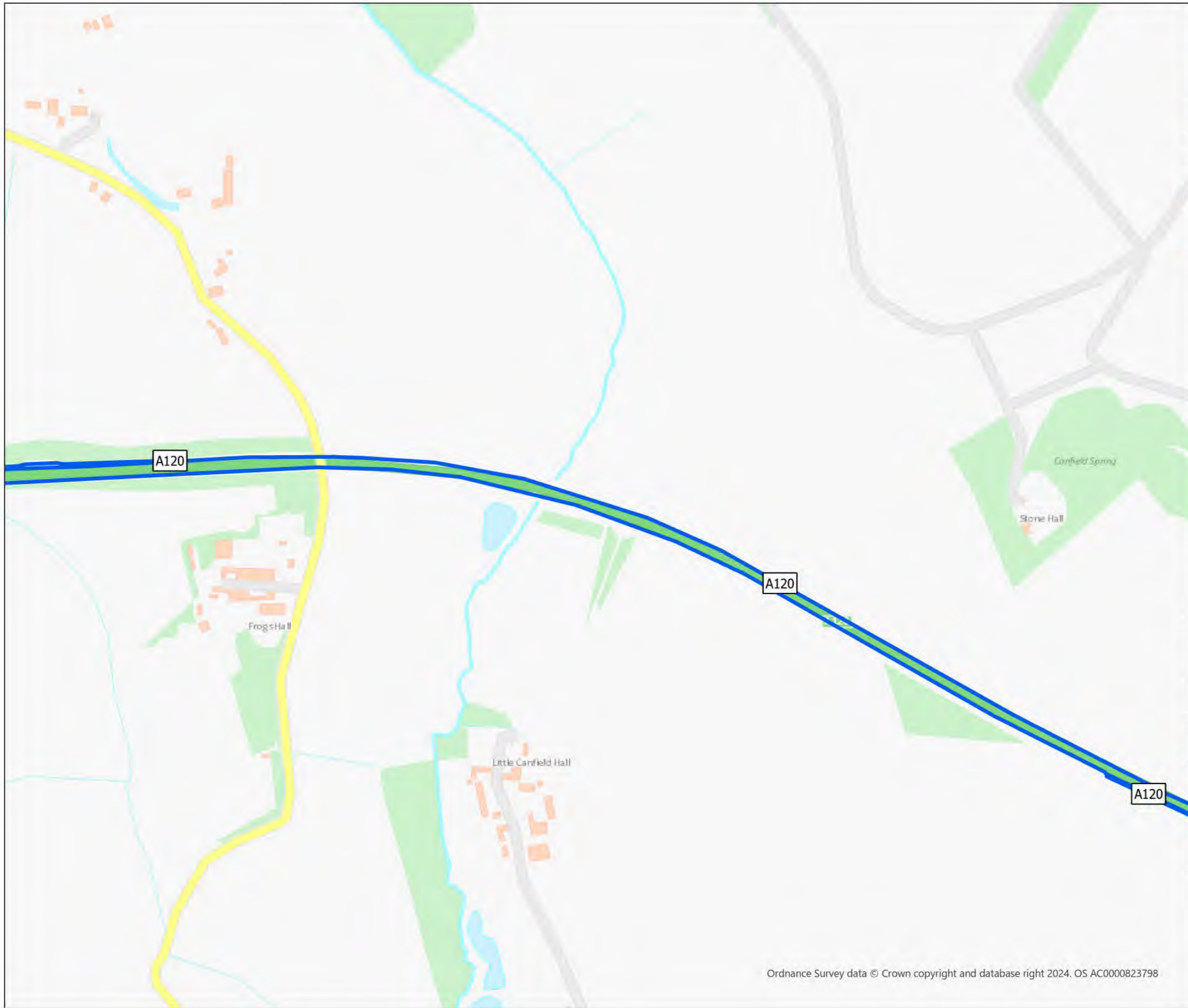
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Key:

Injunction Roads

- covered by injunction 26/04/2024
- ✈ UK Airports
- National Highways South East Injunction Additional Parts



Title: Strategic Road Network - A120

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 22/07/2024

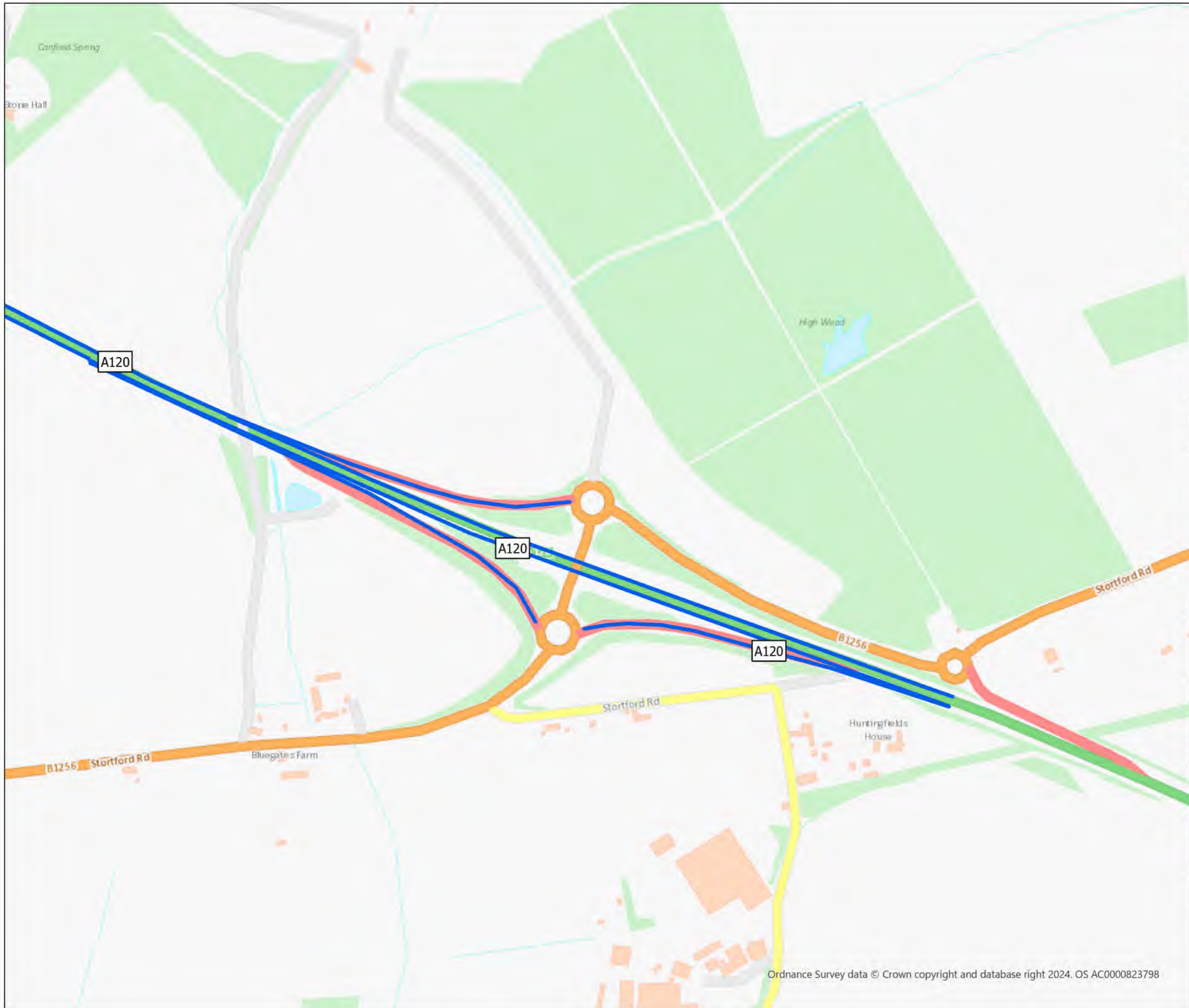
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Key:

Injunction Roads

- covered by injunction 26/04/2024

✈ UK Airports

— National Highways South East Injunction Additional Parts



Title: Strategic Road Network - A120-B1256 Junction

Project: N/A

Version Control: V1

Drawn By: G Phipp Checked By: KA
Date: 23/07/2024

Scale: 1:5,000

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SCHEDULE 1 – NAMED DEFENDANTS

For the avoidance of doubt, any person who has previously been a named defendant in these proceedings in the Cotter Injunction, or who has given undertakings to the Court in these proceedings, may nevertheless become Defendant 1 as a person unknown if they commit any of the prohibited acts.

	Name	Details
1.	PERSONS UNKNOWN CAUSING THE BLOCKING OF, OR ENDANGERING, OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25 MOTORWAY, A2, A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY, A1(M), A3, A12, A13, A21, A23, A30, A414 AND A3113 TRUNK ROADS AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40 MOTORWAYS FOR THE PURPOSE OF PROTESTING	
2.	Not used	
3.	Not used	
4.	Not used	
5.	Not used	
6.	Not used	
7.	Not used	
8.	Not used	
9.	Not used	
10.	Not used	
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116.	Not used	
117.	Not used	
118.	Not used	
119.	Not used	
120.	Not used	
121.	Not used	
122.	Not used	

123.	Not used	
124.	Not used	
125.	Not used	
126.	Not used	
127.	Not used	
128.	Not used	
129.	Not used	
130.	Not used	
131.	Not used	
132.	Not used	
133.	Not used	
134.	Not used	
135.	Not used	
136.	Not used	
137.	Not used	
138.	Not used	
139.	Not used	
140.	Not used	

SCHEDULE 2

CHIEF CONSTABLES OF THE FORCES OF:

City of London Police

Metropolitan Police Service

Avon and Somerset Constabulary

Bedfordshire Police

Cambridgeshire Constabulary

Cheshire Constabulary

Cleveland Police

Cumbria Constabulary

Derbyshire Constabulary

Devon & Cornwall Police

Dorset Police

Durham Constabulary

Essex Police

Gloucestershire Constabulary

Greater Manchester Police

Hampshire Constabulary

Hertfordshire Constabulary

Humberside Police

Kent Police

Lancashire Constabulary

Leicestershire Police

Lincolnshire Police

Merseyside Police

Norfolk Constabulary

North Yorkshire Police

Northamptonshire Police

Northumbria Police

Nottinghamshire Police

South Yorkshire Police

Staffordshire Police

Suffolk Constabulary

Surrey Police

Sussex Police

Thames Valley Police

Warwickshire Police

West Mercia Police

West Midlands Police

West Yorkshire Police

Wiltshire Police