

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No. QB-2022-001317

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

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

WITNESS STATEMENT OF STEPHEN JENNINGS

I, **Detective Superintendent Stephen Jennings**, of Essex Police, Sandford Road, Chelmsford, Essex CM2 6DA, will say as follows –

1. I am a Detective Superintendent at Essex Police. My role in the response to protest activity is one known as PIP4. A PIP4 is performed by a senior experienced Detective within Policing. I have the strategic lead for all criminal investigations linked to Operation Hazel. I provide support to the lead Senior Investigating Officer (SIO and PIP3 qualified) and provide investigative advice to the Gold Commander. I have been a Police officer for 27 years and a qualified Detective for 25 years through every rank. I have managed some of the most complex investigations including homicide, rape and kidnap.
2. I make this witness statement in support of the Claimants' application to add further named Defendants to the Claim for injunctive relief. I understand from the Claimants' legal

representatives that this application is made ahead of a case management hearing listed to be heard on 19 April 2024.

3. I understand that the Claimants currently have the benefit of an interim injunction that guards against and prohibits acts of unlawful protest in the Claimants' administrative areas (the '**Borough**' hereafter). Essex Police are familiar with the injunction, and have utilised the power of arrest therein on five occasions to date, and fully support the Claimants' claim.
4. The facts and matters set out by me in this witness statement are either known by me directly and are true, or are known by me indirectly and are believed to the best of my knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief. This statement was prepared through email correspondence with the Claimants' legal representatives.
5. There is exhibited to this statement a bundle of documents marked 'SJ'. Where I refer to documents contained in that bundle I do so in the format [**SJ/exhibit number**].
6. In this witness statement, I shall address:
 - i. The proposed named Defendants;
 - ii. Incidents of protest in the Borough and the impact of the same;
 - iii. Power of arrest.

Introduction

7. I understand from the Claimants' legal representatives that the Claimants have previously filed extensive evidence in support of the interim injunction that is currently in place, including evidence from Temporary Detective Chief Superintendent Morgan Cronin of Essex Police. The purpose of my witness statement is to explain the circumstances in which the Claimants have come to identify the further persons who the Claimants seek to add to the Claim as named Defendants, as that identification occurred (as it did with the 222 Defendants who are already named) with the assistance of Essex Police.

8. I shall also explain the actions of the protestors in the period of protest in which the proposed new Defendants were identified, and the impact of the same.

The proposed named Defendants

9. The Claimants seek to add 33 new named Defendants to the Claim for injunctive relief. All 33 of those persons were arrested in the Borough between 23 August and 4 September 2022 in connection with the 'Just Stop Oil' protests that occurred in the Borough at that time.

10. I exhibit at **SJ/1** a schedule which details the name of the proposed Defendant, the number of times that they were arrested in this period, the location of their arrest, and a summary of the reasons for their arrest. It is alleged that each person who was arrested and who the Claimants seek to add to this Claim are persons who were engaging in conduct that went beyond peaceful protest, such that their actions were unlawful. Often, mass disruption was caused by the protests, and there were significant safety issues in some instances.

11. I should add that more than 33 people were arrested in the period in question (I understand the total number to be 65, as per the MG11 witness statement of Chief Supt Glen Pavelin, to which I shall refer and exhibit below). However, five of those persons are already named Defendants (and these people were also arrested under the power of arrest provided for in the injunction, and committal proceedings were pursued against them). Further, I understand that the Claimants have not sought to name some others who were arrested in this period, as the conduct for which they were arrested is not conduct that the Claimants seek to restrain and prohibit pursuant to the terms of the injunction sought.

12. The Claimants have been able to identify the 33 proposed Defendants by way of information sharing between Essex Police and the Claimants. Essex Police have shared with the Claimants the custody records of each person arrested (redacted where necessary and appropriate), from which the Claimants are able to ascertain the identifying information of the person, including their name and address. Further, the custody record summarises the alleged offence(s) for which the person has been arrested, and gives a summary of the circumstances of the same.

13. It is from these custody records that I understand the Claimants' legal advisers have prepared the arrest schedule but, as I say, the raw data is held and was processed in the first instance by Essex Police.

Incidents of protest in the Borough and impact of the same

14. The Borough first experienced protests by the Just Stop Oil group in April 2022. The pre-existing 222 named Defendants were all arrested in connection with those protests between 1 and 16 April 2022, following which the Claimants sought and obtained an interim injunction on 24 April 2022. I understand from the Claimants' legal representatives that that the injunction was sought at that time as, following a brief pause in protest activity, Just Stop Oil announced that they would recommence protest activity in the Borough on 25 April 2022.

15. The protest activity of Just Stop Oil in April 2022 included the well-known disruptive tactics of groups of this nature including, but not limited to, locking on to roads and vehicles (whether by super glue or with locks of some description), other obstruction of the highway, trespass on sensitive sites and, in some instances, tunnelling under the highway.

16. There was a pause in protest activity in the Borough over the late spring and early summer of 2022, before activity recommenced in late August 2022. In that second round of protests, similar conduct to that which was experienced in April 2022 again occurred.

17. In relation to the protests that commenced on 23 August 2022, I exhibit at **SJ/2** the MG11 witness statement of Chief Superintendent Glen Pavelin, who was the Police Gold Commander and Chairperson of the Strategic Co-ordination Group during Operation Hazel 2 (Operation Hazel being the code name for the policing operation of the Just Stop Oil protests in the Borough, and this being the second round of these protests).

18. In that witness statement, Chief Supt Pavelin describes some of the key protest activities that took place, the disruption that was caused, and the cost incurred by Essex Police in policing the same. In particular, Chief Supt Pavelin describes one of the most disruptive and unsafe elements of the protest in the August 2022 protests, specifically:

- i. Two tunnels were dug under two separate roads in the Borough (those being Stoneness Road and St Clements Way). Both tunnels were located on roads that serviced the oil depots and industrial areas;
- ii. The tunnel under St Clements Way was close to the railway line, which initially affected train services as the line needed to be closed;
- iii. Businesses in the areas of the tunnels were affected, along with hundreds of workers who could not get to work in the industrial area;
- iv. Other agencies were affected by the tunnelling, as they had to attend to assist with the management of the tunnels (including ambulance and fire services, the British Transport Police, Network Rail, Anglian Water and the First Claimant Thurrock Council);
- v. 6 people were arrested in relation to the tunnelling.

19. I understand from the custody records (from which the arrest schedule has been prepared) that the tunnel incident on St Clements way was not resolved until 4 September 2022, when the three occupants of the tunnel were arrested. I understand from the Claimants that the tunnel is alleged to have been occupied from 23 August 2022 onwards, and that the First Claimant sought and obtained a possession order in relation to the tunnel on 2 September 2022. Two of the occupants of the tunnel (Joe Howlett and Samuel Johnson) are within the list of proposed new Defendants. The third occupant was already a named Defendant to the injunction, and has since sadly passed away.

20. Chief Supt Pavelin also mentions an incident at a petrol station forecourt. I believe that this refers to the incident at the Esso petrol station forecourt at the Thurrock motorway services. The custody records show that several protestors sat the entranceway to the petrol station forecourt and obstructed access, and that the petrol pumps at the services were damaged with a hammer and spray paint. Five of the persons arrested at the scene were further arrested in custody under the power of arrest in the injunction, and committal proceedings were brought against them accordingly. I understand from the Claimants that all five admitted the breaches of the injunction order alleged and received suspended custodial

sentences, with one also being fined (that being the person who also admitted to damaging the petrol pumps).

21. Chief Supt Pavelin also explains the resourcing implications of the August 2022 protests, which included:

- i. Operation Hazel 2 cost Essex Police £304,543 (including funding extra officers, specialist officers, and support services);
- ii. 1181 officers were assigned duties under Operation Hazel 2, completing 12,224 hours of work;
- iii. Officers worked extended duties (increased to 12 hours from 8);
- iv. 216 Officer rest days were cancelled.

Power of arrest

22. I am told by the Claimants' legal advisers that the power of arrest will expire shortly, and that they will be seeking to extend the same at the listed case management hearing. From a policing perspective, the power of arrest is extremely valuable, as it enables the swift enforcement of the injunction and the resolution of disruption on the ground (and hopefully also deters some from engaging in such conduct in the first place). The power of arrest, and the threat of the use of the same, can help diffuse a situation without the police needing to exercise their own powers and allocate their own resources beyond the initial arrest, transfer to custody and transfer to court.

Conclusion

23. The Claimants, with the assistance of Essex Police, have identified 33 further persons who should be named as Defendants in the Claim for injunctive relief by reason of their alleged acts of unlawful protest in the Borough between 23 August and 4 September 2022.

24. The period of protest in question was disruptive, in some instances unsafe, and a drain on Police resources.

Statement of Truth

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

Signed

A handwritten signature in black ink, appearing to read 'S. Jennings', written in a cursive style.

Detective Superintendent Stephen Jennings
Date: 23rd March 2024

Claimants
Stephen Jennings
First statement
Exhibits SJ/1-SJ/2
23 March 2024

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(1) MADELINE ADAMS

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

(223)-(229) PERSONS UNKNOWN

Defendants

EXHIBIT SJ/1

Details of Arrests between 23 August 2022 and 4 September 2022 in the Borough

Notes:

- ‘DP’ – Detained Person
- Multiple arrests in relation to the same conduct are counted as a single arrest

Name	Number of arrests	Date(s) and time(s)	Location of arrest(s)	Summary of reason(s) for arrest (as per custody front sheet, where available)
Alice Wharrie	1	25 August 2022 10:54 and 11:00	Oliver Road, Thurrock	<p>Conspiracy to commit public nuisance (10:54) and intentionally and recklessly causing a public nuisance (11:00).</p> <p>DP was in a hole in Oliver Road as part of ongoing Just Stop Oil protests.</p>
Anne Hart	1	24 August 2022 06:56	Motoservices Thurrock	<p>Criminal damage. DP amongst a group of people believed to be involved in the damage of petrol pumps by spray painting or smashing the displays of the petrol pumps.</p> <p>Note: five persons already named as Defendants faced contempt proceedings for this breach of the interim injunction. Four admitted liability to breaches of paragraphs 2.14 and 2.15 of the injunction Order by reason of sitting on the access road into the petrol station forecourt. The fifth admitted to the same, along with a further breach of paragraph 2.16 of the injunction order by reason of damaging 16 petrol pumps with spray paint and/or a hammer.</p>

Anthony Whitehouse	1	23 August 2022 13:30	Exolum, Askews Farm Lane, Grays	Aggravated trespass. DP alleged to have entered the fuel site and climbed on pipe work above a fuel station, causing the site to cease operation.
Callum Goode	2	28 August 2022 19:50 and 29 August 2022 16:13	St Clements Way, Grays and in interview	Possession of an article to commit criminal damage. DP is alleged to have attempted to drill into the rear tyre of a moving oil tanker in an attempt to disable the vehicle. DP also found to be in possession of superglue. DP further arrested in interview for conspiracy to commit damage and tampering with vehicles in West Thurrock St Clements Way.
		30 August 2022 04:55	A1090 Scene 2, Tunnel 2, Thurrock	Conspiracy to commit public nuisance. DP was found within 2 metres of a tunnel excavated and occupied by protestors under the A1090. DP was in possession of supplies to keep fed and clean. DP had been released from custody some 7 hours earlier, upon which he had not been in possession of those supplies.
Caroline Cattermole	1	23 August 2022 06:08	St Clements Way, Grays	Obstruction of the highway, DP refused to move following the five-step appeal process.
Christopher Bennett	1	29 August 2022 14:05	Stoneness Road, Purfleet	DP was in occupation of a tunnel in the course of Just Stop Oil protests.
Christopher Hardy	1	23 August 2022 06:37	St Clements Way, Grays	DP sat on St Clements Way and prevented vehicles using the road. DP refused to move following the five-step appeal process.
David Nixon	1	23 August 2022 06:37	St Clements Way, Grays	DP was part of a group obstructing the highway by having glued themselves to the road.

Isabel Walters	1	23 August 2022 06:37	St Clements Way, Grays	DP was part of a group obstructing the highway by having glued themselves to the road.
Jade Calland	1	23 August 2022 12:13	London Road, Grays	Aggravated trespass. DP was protesting at height in an oil rig and found to be in possession of glue.
Jane Touil	1	23 August 2022 06:37	St Clements Way, Grays	DP was one of ten persons obstructing the highway. DP glued her hand to the road and refused to move following the five-step appeal process.
Joe Howlett	1	4 September 2022 15:45	St Clements Way, Grays	Public nuisance and criminal damage. DP has excavated and occupied a tunnel under St Clements Way, damaging also the tarmac on the road. St Clements Way was closed to vehicles. Noe: the First Claimant sought and obtained a possession order from the Chancery Division of the High Court on 2 September 2022. The DP is alleged to have occupied the tunnel from 23 August 2022.
John Jordan	1	29 August 2022 00:30, 17:15 and 17:50	St Clements Way, Grays and in interview	DP climbed on top of a fuel tanker and refused to decamp the vehicle (interference with a motor vehicle). Further arrested in interview (17:15 and 17:50), including for criminal damage.
Jonathan Coleman	1	23 August 2022 06:37	St Clements Way, Grays	DP was one of several persons obstructing the highway. DP glued himself to the road.
Judy Judkins	1	23 August 2022 06:37	St Clements Way, Grays	DP was sat in a live carriageway and refused to move following the five-step appeal process.

Karan Wildin	2	28 August 2022 19:41 and 22:40, and 29 August 2022 17:26	St Clements Way, Grays and in custody	DP abandoned her bicycle in the middle of the highway and ran towards an oil tanker on the highway. Further arrested in custody when found to be in possession of glue. DP arrested in custody for conspiracy to commit criminal damage by planning with others to use a drill to damage the tyres of the abovementioned oil tanker and also by using glue to stick herself to the oil tanker.
		30 August 2022 04:55	A1090, Site 2	Conspiracy to commit public nuisance. DP found in a tunnel excavated by protestors, with supplies to enable occupation for multiple days. DP had been released from custody some 7 hours earlier.
Kayleigh Matthews	1	23 August 2022 12:26	Askews Farm Lane, Grays	Aggravated trespass. DP entered the Exolum oil terminal, causing the site to cease operations.
Larch Maxey	1	28 August 2022 11:35	Oliver Road, Grays	DP tunnelled under the road and caused a public nuisance by reason of preventing traffic using the road.
Lindsay Hart	1	24 August 2022 06:56 and 18:32	Motoservices, Thurrock and in interview	Criminal damage. DP amongst a group of people believed to be involved in the damage of petrol pumps by spray painting or smashing the displays of the petrol pumps. Further arrested in interview for obstructing the access to the petrol station forecourt. Note: five persons already named as Defendants faced contempt proceedings for this breach of the interim injunction. Four admitted liability to breaches of paragraphs 2.14 and 2.15 of the injunction Order by

				reason of sitting on the access road into the petrol station forecourt. The fifth admitted to the same, along with a further breach of paragraph 2.16 of the injunction order by reason of damaging 16 petrol pumps with spray paint and/or a hammer.
Margaret Reid	1	28 August 2022 20:26	St Clements Way, Grays	DP seen running towards protestors who were obstructing a highway. Upon being searched, DP was found to be in possession of glue, and her hands were also covered in glue (threat or possession with intent to cause criminal damage).
Mia Powell	1	24 August 2022 06:56 and 22:39	Motoservices, Thurrock and in interview	Criminal damage. DP believed to be involved in the damage of petrol pumps by spray painting or smashing the displays of the petrol pumps. Further arrested in interview for obstructing the access to the petrol station forecourt. Note: five persons already named as Defendants faced contempt proceedings for this breach of the interim injunction. Four admitted liability to breaches of paragraphs 2.14 and 2.15 of the injunction Order by reason of sitting on the access road into the petrol station forecourt. The fifth admitted to the same, along with a further breach of paragraph 2.16 of the injunction order by reason of damaging 16 petrol pumps with spray paint and/or a hammer.
Phoebe Plummer	1	28 August 2022 21:11	St Clements Way, Grays	DP entered the highway with other protestors and was found to be in possession of glue (threat or possession with intent to cause criminal damage).

Sam Parry Holland	1	23 August 2022 07:35	Askews Farm Lane, Grays	Aggravated trespass. DP gained access to the Shell fuel depot and was found to be at the top of a ladder on a fuel tanker, disrupting the functioning of the site.
Samuel Johnson	1	4 September 2022 15:44	St Clements Way, Grays	Public nuisance and criminal damage. DP has excavated and occupied a tunnel under St Clements Way, damaging also the tarmac on the road. St Clements Way was closed to vehicles. Noe: the First Claimant sought and obtained a possession order from the Chancery Division of the High Court on 2 September 2022. The DP is alleged to have occupied the tunnel from 23 August 2022.
Sarah MacDonald	1	24 August 2022 06:57	Motoservices, Thurrock	Criminal damage. DP believed to be involved in the damage of petrol pumps by spray painting or smashing the displays of the petrol pumps. Note: five persons already named as Defendants faced contempt proceedings for this breach of the interim injunction. Four admitted liability to breaches of paragraphs 2.14 and 2.15 of the injunction Order by reason of sitting on the access road into the petrol station forecourt. The fifth admitted to the same, along with a further breach of paragraph 2.16 of the injunction order by reason of damaging 16 petrol pumps with spray paint and/or a hammer.
Seiriol Davies	1	24 August 2022 06:56 and 17:23	Motoservices, Thurrock and in interview	Criminal damage. DP believed to be involved in the damage of petrol pumps by spray painting or smashing the displays of the petrol pumps. Further arrested in

				<p>interview for obstructing the access to the petrol station forecourt.</p> <p>Note: five persons already named as Defendants faced contempt proceedings for this breach of the interim injunction. Four admitted liability to breaches of paragraphs 2.14 and 2.15 of the injunction Order by reason of sitting on the access road into the petrol station forecourt. The fifth admitted to the same, along with a further breach of paragraph 2.16 of the injunction order by reason of damaging 16 petrol pumps with spray paint and/or a hammer.</p>
Simon Reding	1	23 August 2022 06:37	St Clements Way, Grays	DP was part of a group obstructing the highway by sitting in the road and having glued themselves to the road. Lorries and other road users were unable to travel along the road.
Stephen Gingell	1	23 August 2022 12:26	Exolum, Askews Farm Road, Grays	Aggravated trespass. DP entered the fuel terminal and climbed above pipes above the gantry, preventing the refuelling of tankers.
Suzie Webb	1	28 August 2022 19:55 and 29 August 2022 15:44	St Clements Way, Grays and in interview	<p>DP passed through a road closure. Upon being searched by Police, DP was found to be in possession of a drill and branded high-visibility clothing (threat or possession with intent to commit criminal damage).</p> <p>Further arrested in interview for conspiring with others to commit criminal damage.</p>
Victoria Lindsell	1	28 August 2022 21:22	St Clements Way, Grays	DP was part of a group of persons protesting. Upon arrival Police officers, DP ran in front of traffic. Upon

				being searched by Police, DP found to be in possession of tubes of glue (threat of possession with intent to commit criminal damage).
Wendy Cocks	1	23 August 2022 06:08	St Clements Way, Grays	DP was obstructing the highway and refused to move following the five-step appeal process.
Diana Martin	1	23 August 2022 06:37	St Clements Way, Grays	DP sat on live carriageway and refused to move following the five-step appeal process
Tony Muir	1	24 August 2022 06:56 and 17:44	Motoservices, Thurrock and in interview	<p>Criminal damage. DP alleged to have damaged a petrol pump by graffiti and with a hammer. Further arrested in interview for obstructing the forecourt of the petrol station forecourt.</p> <p>Note: five persons already named as Defendants faced contempt proceedings for this breach of the interim injunction. Four admitted liability to breaches of paragraphs 2.14 and 2.15 of the injunction Order by reason of sitting on the access road into the petrol station forecourt. The fifth admitted to the same, along with a further breach of paragraph 2.16 of the injunction order by reason of damaging 16 petrol pumps with spray paint and/or a hammer.</p>

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(223)-(229) PERSONS UNKNOWN

Defendants

EXHIBIT SJ/2

WITNESS STATEMENT

Criminal Procedure Rules, r. 16.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B

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Statement of: Glen Colin Pavelin

Age if under 18: 0 18 (if over 18 insert 'over 18') Occupation: Chief Superintendent 1380

This statement (consisting of 3 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.

Signature:..... (witness) Date: 29/01/2024

I am writing this statement in relation to my role as the Police Gold Commander and Chairperson of the Strategic Co-ordination Group during Operation Hazel 2. Between Tuesday 23rd August 2022 and Friday 9th September 2022, Essex police responded to the planned protest activities for the group "Just Stop Oil" (JSO). This operation is known as Operation Hazel 2 which is a continuance of the JSO protests that occurred within Essex in April 2022 where 280 persons were arrested, which was known as Operation Hazel.

This role involves the strategic command of all Essex Police resources allocated to the incident and chair of Senior Stakeholders that form the Strategic Co-ordination group. My role is to deliver the strategic objectives agreed by the Strategic Co-ordination group and the Police Gold Strategy. In doing so, I aim to keep people safe, help people and bring offenders to justice. I am accountable to the Chief Constable.

I have been a Gold Commander since September 2019. I am an occupationally and operationally competent Specialist Strategic Firearms Commander, Gold Public Order Public Safety Commander, and Multi Agency Gold Incident Commander. I have experience in managing the force as Force Gold on many occasions. I also have experience of managing major and critical

Signature: Signature witnessed by:

Incidents including high threat situations involving firearms/threat to life, protest, and multi-agency responses to spontaneous and planned events. I have also held the role of head of department and Chief Officer lead for Operations and Contact Management. I therefore have recent experience of all matters associated with managing how Essex Police respond to critical incidents.

Just Stop Oil are a group of climate protesters, who utilize civil resistance tactics by seeking to disrupt the refining, storage, transportation, and distribution of fossil fuels within the United Kingdom. Their aim is to force government to immediately stop all new fossil fuel activity and the renewal of licenses.

Between Tuesday 23rd August and Friday 9th August 2022, “Just Stop Oil” led a protest campaign in Gray’s, Thurrock, Essex. One of the actions by the group was the digging of two tunnels under two separate roads, St Clements Way and Stoneness Road Gray’s, Thurrock. Both tunnels were located on significant routes to and from the oil depots and industrial areas. St Clements Way Tunnel was located directly next to a train line which initially effected services due to the line closure.

Protesters committed further activity by Climbing onto tankers, blocking roads including gluing themselves to roads, criminal damage to a petrol forecourt and aggravated trespass by gaining access to fuel terminals and climbing onto Silo’s and fuel pipes at height. The protests were highly disruptive, causing a significant threat on the private lives of the community and businesses.

Further concern within the southeast of England being if substantial disruption was to occur to fuel supply. The impact on the Emergency services being police, ambulance and fire service would be put at great risk from fulfilling their role in protecting the lives of the community as they require fuel to operate. The restriction on fuel supply would have a significant impact to essential services which would directly interfere with article 2 of the human rights Act – the right to life.

Essex police are appraised of the Human Rights Act, namely Article 9 (freedom of conscience), Article 10 (freedom of expression) and Article 11 (freedom of assembly). However, these rights and protest activity must be proportionate and fair in the balance of Article 2 (the right to life) of the community.

Signature: Signature witnessed by:

The police have powers to close roads under section 67 Road Traffic Act 1984. This means that in extraordinary circumstances, where it is necessary to prevent or mitigate congestion or obstruction of traffic, or danger to or from traffic, we are able to close any roads necessary. The police also have common law powers to secure and preserve crime scenes.

Due to the actions of the protesters digging the two tunnels' businesses were substantially affected in the area, along with hundreds of workers who could not get to work on the industrial area. In total 33 businesses provided statements of the impact to their businesses with many more effected.

Other agencies who were affected by attendance, to assist with the management of the Tunnels were, East of England Ambulance Service, Fire Service, British Transport Police, Thurrock Council, Network Rail, Anglian Water, and the Emergency Incident Management Team.

In total 65 protesters were arrested throughout Operation Hazel 2, 6 of them being arrested from the two tunnels which lasted for the entirety of the operation. The operation cost Essex police £304,543, which included funding extra officers, specialist officers and support services. In total 1181 officers were assigned duties for the operation, completing 12,224 hours worked. Essex officers worked extended duties from an average of an 8-hour shift to 12-hour shifts, this inevitably had an impact on officers' welfare and work life balance. In total 216 officers rest days were cancelled; shifts were changed at short notice which meant they were taken away from their normal work.

The mutli-agency response to this incident was demanding and undoubtedly had an impact on the local community as well as the officers and staff deployed to keep the county of Essex safe.

Signature: Signature witnessed by: