



EUROPEAN COURT OF HUMAN RIGHTS
COUR EUROPÉENNE DES DROITS DE L'HOMME

Application Form

About this application form

This form is a formal legal document and may affect your rights and obligations. Please follow the instructions given in the “Notes for filling in the application form”. Make sure you fill in all the fields applicable to your situation and provide all relevant documents.

Warning: If your application is incomplete, it will not be accepted (see Rule 47 of the Rules of Court). Please note in particular that Rule 47 § 2 (a) requires that a concise statement of facts, complaints and information about compliance with the admissibility criteria MUST be on the relevant parts of the application form itself. The completed form should enable the Court to determine the nature and scope of the application without recourse to any other submissions.

Barcode label

If you have already received a sheet of barcode labels from the European Court of Human Rights, please place one barcode label in the box below.

Reference number

If you already have a reference number from the Court in relation to these complaints, please indicate it in the box below.

A. The applicant

A.1. Individual

This section refers to applicants who are individual persons only. If the applicant is an organisation, please go to section A.2.

1. Surname

Churchill

2. First name(s)

Karen

3. Date of birth

[	R	E	D	A	C	T	E	+
D	D	M	M	Y	Y	Y	Y	

e.g. 31/12/1960

4. Place of birth

[REDACTED]

5. Nationality

[REDACTED]

6. Address

[REDACTED]

7. Telephone (including international dialling code)

[REDACTED]

8. Email (if any)

[REDACTED]

9. Sex ☐ male ☐ female

A.2. Organisation

This section should only be filled in where the applicant is a company, NGO, association or other legal entity. In this case, please also fill in section D.1.

10. Name

11. Identification number (if any)

12. Date of registration or incorporation (if any)

D	D	M	M	Y	Y	Y	Y

e.g. 27/09/2012

13. Activity

14. Registered address

15. Telephone (including international dialling code)

16. Email

B. State(s) against which the application is directed

17. Tick the name(s) of the State(s) against which the application is directed.

- | | |
|--|--|
| ☐ ALB - Albania | ☐ ITA - Italy |
| ☐ AND - Andorra | ☐ LIE - Liechtenstein |
| ☐ ARM - Armenia | ☐ LTU - Lithuania |
| ☐ AUT - Austria | ☐ LUX - Luxembourg |
| ☐ AZE - Azerbaijan | ☐ LVA - Latvia |
| ☐ BEL - Belgium | ☐ MCO - Monaco |
| ☐ BGR - Bulgaria | ☐ MDA - Republic of Moldova |
| ☐ BIH - Bosnia and Herzegovina | ☐ MKD - North Macedonia |
| ☐ CHE - Switzerland | ☐ MLT - Malta |
| ☐ CYP - Cyprus | ☐ MNE - Montenegro |
| ☐ CZE - Czech Republic | ☐ NLD - Netherlands |
| ☐ DEU - Germany | ☐ NOR - Norway |
| ☐ DNK - Denmark | ☐ POL - Poland |
| ☐ ESP - Spain | ☐ PRT - Portugal |
| ☐ EST - Estonia | ☐ ROU - Romania |
| ☐ FIN - Finland | ☐ RUS - Russian Federation* |
| ☐ FRA - France | ☐ SMR - San Marino |
| ☒ GBR - United Kingdom | ☐ SRB - Serbia |
| ☐ GEO - Georgia | ☐ SVK - Slovak Republic |
| ☐ GRC - Greece | ☐ SVN - Slovenia |
| ☐ HRV - Croatia | ☐ SWE - Sweden |
| ☐ HUN - Hungary | ☐ TUR - Türkiye |
| ☐ IRL - Ireland | ☐ UKR - Ukraine |
| ☐ ISL - Iceland | |

* On 16 September 2022 the Russian Federation ceased to be a Party to the European Convention on Human Rights.

C. Representative(s) of the individual applicant

An individual applicant does not have to be represented by a lawyer at this stage. If the applicant is not represented please go to section E.

Where the application is lodged on behalf of an individual applicant by a non-lawyer (e.g. a relative, friend or guardian), the non-lawyer must fill in section C.1; if it is lodged by a lawyer, the lawyer must fill in section C.2. In both situations section C.3 must be completed.

C.1. Non-lawyer

18. Capacity/relationship/function

19. Surname

20. First name(s)

21. Nationality

22. Address

23. Telephone (including international dialling code)

24. Fax

25. Email

C.2. Lawyer

26. Surname

27. First name(s)

28. Nationality

29. Address

30. Telephone (including international dialling code)

31. Fax

32. Email

C.3. Authority

The applicant must authorise any representative to act on his or her behalf by signing the first box below; the designated representative must indicate his or her acceptance by signing the second box below.

I hereby authorise the person indicated above to represent me in the proceedings before the European Court of Human Rights concerning my application lodged under Article 34 of the Convention.

33. Signature of applicant

34. Date

D	D	M	M	Y	Y	Y	Y

e.g. 27/09/2015

I hereby agree to represent the applicant in the proceedings before the European Court of Human Rights concerning the application lodged under Article 34 of the Convention.

35. Signature of representative

36. Date

D	D	M	M	Y	Y	Y	Y

e.g. 27/09/2015

Electronic communication between the representative and the Court

37. Email address for eComms account (if the representative already uses eComms, please provide the existing eComms account email address)

By completing this field you agree to using the eComms system.

D. Representative(s) of the applicant organisation

Where the applicant is an organisation, it must be represented before the Court by a person entitled to act on its behalf and in its name (e.g. a duly authorised director or official). The details of the representative must be set out in section D.1.
If the representative instructs a lawyer to plead on behalf of the organisation, both D.2 and D.3 must also be completed.

D.1. Organisation official

38. Capacity/relationship/function (please provide proof)

39. Surname

40. First name(s)

41. Nationality

42. Address

43. Telephone (including international dialling code)

44. Fax

45. Email

D.2. Lawyer

46. Surname

47. First name(s)

48. Nationality

49. Address

50. Telephone (including international dialling code)

51. Fax

52. Email

D.3. Authority

The representative of the applicant organisation must authorise any lawyer to act on its behalf by signing the first box below; the lawyer must indicate his or her acceptance by signing the second box below.

I hereby authorise the person indicated in section D.2 above to represent the organisation in the proceedings before the European Court of Human Rights concerning the application lodged under Article 34 of the Convention.

53. Signature of organisation official

54. Date

D	D	M	M	Y	Y	Y	Y

e.g. 27/09/2015

I hereby agree to represent the organisation in the proceedings before the European Court of Human Rights concerning the application lodged under Article 34 of the Convention.

55. Signature of lawyer

56. Date

D	D	M	M	Y	Y	Y	Y

e.g. 27/09/2015

Electronic communication between the representative and the Court

57. Email address for eComms account (if the representative already uses eComms, please provide the existing eComms account email address)

By completing this field you agree to using the eComms system.

Subject matter of the application

All the information concerning the facts, complaints and compliance with the requirements of exhaustion of domestic remedies and the four-month time-limit laid down in Article 35 § 1 of the Convention must be set out in this part of the application form (sections E, F and G). It is not acceptable to leave these sections blank or simply to refer to attached sheets. See Rule 47 § 2 and the Practice Direction on the Institution of proceedings as well as the “Notes for filling in the application form”.

E. Statement of the facts

58.
This application is brought jointly by Neil McDougall and Karen Churchill. References to “we”, “us” and “our” mean both applicants.

Our case developed through three successive domestic mechanisms seeking to resolve a systemic lacuna in the pre-authorisation public-health framework for telecommunications development. We first relied upon EUWA 2018 Schedule 8 paragraph 39(5) in our September 2023 submission. At the Court of Appeal and subsequently the Supreme Court, we sought to engage the obligatory s.6D EUWA 2018 mechanism. After the judicial route closed, we pursued REULA 2023 s.7 before its removal at the 23 June 2026 “sunset”. Throughout we sought legal certainty as to how, and by whom, the European Electronic Communications Code (Directive (EU) 2018/1972) (“EECC”) public-health and environmental protection functions were to be performed before authorisation, together with protection of two connected rights: public-health protection through the EECC procedural standard, and the right to have relevant public health and environmental evidence properly taken into account before authorisation. The accompanying Additional Information (“Annex”) sets out these stages in detail.

E1. THE SEPTEMBER 2023 CHALLENGE, ALLEGED LACUNA AND GOVERNMENT DEFENSE OF THE CLAIM

1.Our submission of 13 September 2023 (“SUB13/9; Attachment 1, bundle pp.1–81) to the Secretaries of State responsible for public health, planning and telecommunications policy challenged administrative conduct and omissions concerning the failure to identify and make operational the Local Authority/Local Planning Authority (LA/LPA) competent-authority functions, and to establish the associated objectives and criteria required to give effect to the European Electronic EECC public health and environmental protection framework, and the subsequent failure to remedy those omissions. (Annex §§1.1, 1.5–1.6, pp.1–2)

2. We described the resulting problem as a regulatory “lacuna”: telecommunications development are authorised through domestic planning procedures, but no identified authority or procedure ensure that the directly assigned EECC public health functions are performed within those procedures. The remedies we sought were administrative intended to rectify functions rather than to invalidate legislation enacted through 2020 Regulations. (Annex §§2.1–2.3, pp.2–3)

3. Appendix 1 evidenced conflicting positions concerning LA/LPA competent authority status and public health functions. It recorded Solihull MBC’s unsuccessful attempt to obtain clarification, Mendip DC’s exercise of planning judgment on public health evidence, and the BANES/Radstock case, where exclusion-zone drawings showed the neighbouring property within the calculated public exclusion zone. BANES denied its EECC competent-authority status and Ofcom did not assume responsibility for resolving the planning-stage issue. (SUB13/9, Appendix 1; Attachment 1, bundle pp.43–58); see also Annex §§7.15–7.19, pp.16–17)

4. Appendix 2 addressed the “prevention of avoidable harm, injury and nuisance” and identified information and assessments which we maintain LAS/LPAs are required to perform the asserted functions effectively, including exclusion zone information; such zones extending into buildings, cumulative exposure, auditory effects, metal and medical implants and other site-specific public health and environmental evidence. (Appendix 2, SUB13/9, ; Attachment 1, bundle pp.59–81)

5. In resisting the claim, the First Defendant maintained that we had misunderstood the relationship between Recommendation 1999/519/EC and the ICNIRP guidelines, which it said were aligned in the exposure restrictions they recommend. It further maintained that the United Kingdom had adopted the ICNIRP guidelines before the EECC and that no further implementation was required. The Government position was that Ofcom was responsible for authorising and managing spectrum use and ensuring compliance with the ICNIRP public exposure limits, while UKHSA was responsible for public health advice. We maintained that this did not address the systemic lacuna: ICNIRP formed part of a wider binding EECC procedural public health framework; its application itself required assessment of matters such as exclusion zones and the public auditory/sensory limit, while other relevant risks, such as those concerning metal and medical implants and environmental effects, fell outside ICNIRP guidance. The relevance and weight of ICNIRP compliance alongside such evidence therefore remained for the competent decision maker to determine following an ‘in situ’ assessment. (Annex §§2.1–2.2, p.2; §§6.4–6.5, pp.10–11; Attachment 1, SUB13/9, Appendix 2, §§A2.4, A2.7 and A2.9, bundle pp.64–66, 71–77 and 79–80; Attachment 4, JRAR1 25/1, §4 and fn.1, bundle p.123.)

Statement of the facts (continued)

59.
E2.LEGAL BASIS AND CHARACTER OF THE ADMINISTRATIVE-PROVISIONS CLAIM

1. We maintained that the EECC was a Directive whose objectives could be implemented through appropriate domestic “forms and methods”, whether by legislation or other binding provision. Our case was that the existing planning system suffices as binding provision, but to be effective it required the necessary administrative provisions to make the relevant EECC public health and environmental functions operational within planning law, policy and procedures. (Annex §§3.2–3.5, pp.3–4; §7.2, p.12).
2. We relied initially upon EUWA 2018 Schedule 8 paragraphs 39(5) and 39(6) because we maintained that they preserved a Brexit safeguarding mechanism capable of addressing relevant conduct concerning the implementation of a Directive. Our case was that the lacuna arose from the absence or inadequacy of the administrative provisions needed to make the relevant EECC functions operational, rather than from the invalidity of an Act of Parliament or simply from a failure to enact further legislation. (Annex §§4.1, 4.7, pp.4–5; §6.8, pp.11–12)
3. We maintained that the UK Government failed to establish in advance the objectives and criteria governing LA/LPA EECC competent authority and its exercise, nor to give practical effect to the public health imperative in Recital 110, to enable the authorities to determine under Annex I(B)(3) whether public health conditions were required for a particular general authorisation, consciously and effectively. (Annex §§1.5–1.6, pp.1–2; §2.2, p.2)
4. We asserted two connected rights, founded upon the principle of effectiveness: first, by public health protection in accordance with the EECC procedural standard being met prior to granting of an EECC general authorisation or planning permission; and secondly, the right to have written objections raising legitimate interests, and evidence concerning adverse public health and environmental effects, properly taken into account before the relevant authorisation or permission is determined. We maintained that those rights are not be rendered “impossible in practice or excessively difficult to exercise” as LAs/LPAs are obliged to undertake an EECC specific environmental impact assessment . (Annex §§6.1–6.2, pp.9–10)
5. We relied further upon the non-exclusive status of ICNIRP guidance and upon the DLA Piper statement made on behalf of Public Health England that the body exercising the relevant statutory function had to determine what weight to give that guidance and what other evidence from members of the public or interested parties should be considered in making its decision. We therefore maintained that an operator’s declaration of ICNIRP compliance could not itself determine the relevance or weight of other potentially material public health and environmental evidence. (Annex §§6.3–6.6, pp.10–11)
6. Recitals 105, 106, and Article 45(2)(h), relied upon in the original claim, linked protection of public health to Recommendation 1999/519/EC. We subsequently relied upon Annex I(B)(3) as the more precise expression of the competent-authority power to attach public health conditions to a general authorisation. (Annex §2.2, p.2)
7. The practical materiality of such evidence was subsequently demonstrated in Thomas v Cheltenham Borough Council [2024] EWHC 1035 (Admin) case. The High Court held that medical-implant evidence had been wrongly discounted (§43) and observed that, had it been raised in respect of the residences closest to the proposed equipment, it “may well been a factor in a decision to re-site the equipment” (§45). On appeal, Andrews LJ identified the EECC and Annex I public-health conditions within the applicable legal framework (Thomas v Cheltenham Borough Council & Anor [2025] EWCA Civ 259, §15). We relied upon that Court of Appeal judgment in our 17 February 2026 Government submission. (SUB17/2, §2.1; Attachment 23, bundle p.407)

E3. JUDICIAL PROCEEDINGS AND TREATMENT OF THE CLAIM

1. On 21 December 2023 we issued judicial-review proceedings. On 26 April 2024 Jarman J refused permission and certified the claim Totally Without Merit (“TWM”), removing the ordinary opportunity for oral renewal. We appealed on 6 May, maintaining that the claim concerned administrative omissions under Schedule 8 paragraphs 39(5) and 39(6), rather than the validity of the 2020 Regulations, against the Defendants’ preclusion, time-limit and no-direct-effect arguments. We expressly relied upon Article 6 §1 in challenging the TWM certification and loss of an oral hearing. (Annex §1.3, p.1; §§4.5–4.13, pp.4–6; §8.6, pp.18–19)
2. On 31 July 2024 Falk LJ refused permission to appeal, treating the claim as substantially out of time and understanding it as a complaint that ICNIRP was not sufficiently clear or mandatory for LAs/LPAs. She referred to Ofcom’s incorporation of ICNIRP limits into spectrum authorisations. We maintained that Ofcom’s jurisdiction could not compensate for the

Statement of the facts (continued)

60. absence of LA/LPA jurisdiction asserted through planning and development control. (Annex §§7.1–7.10, pp.12–14)
3. On 4 September 2024 we sought reopening under CPR 52.30, again identifying the lacuna as arising from administrative conduct rather than defective legislation and as extinguishing the two rights asserted. Falk LJ refused that application on 31 October, stating that “the EECC is not part of English law”. On 19 December she refused a further application, characterised our complaint as “political, not legal”, and certified it “TWM”. We maintained that the administrative provisions claim remained undetermined and that the absence of an oral hearing prevented us from advancing the remedies sought. (Annex §§4.11–4.12, pp.5–6; §5.5, p.7; §6.8, pp.11–12)
4. On 22 January 2025 we sought clarification of Schedule 8 paragraphs 39(5) and 39(6), a stay of the previous orders, and a Section 6D incompatibility order (GR22/1, §§2.25–2.37; Attachment 12, bundle pp.262–264). Further applications to the Court of Appeal and then the Supreme Court followed (NFA26/2; Attachment 17, bundle p.306); on 4 July 2025 the Supreme Court refused permission, stating that the appeal was “wholly devoid of merit” (SCO7/4; Attachment 19, bundle p.328). We nevertheless maintained that a challenge which was “plainly not unarguable” could not simultaneously be “TWM,” and we continued to seek legal certainty as to the post-Brexit status of the rights and safeguards we relied upon. (Annex §§5.5–5.12, pp.7–9; §§8.1–8.6, pp.17–19)
5. The unresolved question remained: what legally effective domestic procedure enabled the asserted EECC public-health functions and rights to operate before telecommunications authorisation?
- E4. GENERAL AUTHORISATION, PROCEDURAL AUTONOMY AND PLANNING LAW
1. We maintained that the EECC general authorisation system operated through domestic binding provision and that site specific decisions were subject to both the EECC and UK planning law. The relevant question was whether that domestic system provided an authority capable of examining site specific evidence and deciding whether public health conditions were required before authorisation. (Annex §§9.1–9.2, p.19)
2. We relied upon effectiveness, equivalence and procedural autonomy. While the choice of domestic procedure remained with the State, we maintained that the procedure selected had to enable our asserted rights to operate effectively through UK planning law, policy and procedures. (Annex §5.2, p.7; §§9.1–9.2, p.19)
3. We maintained that relevant EECC public health matters could constitute material planning considerations. Relying on *Tesco Stores Ltd v Secretary of State for the Environment* [1995] 1 WLR 759, we distinguished the legal question whether a consideration is material from the weight given to it, which remains a matter of planning judgment for the LA/LPA. (Annex §§10.1–10.3, pp.19–20)
4. We therefore maintained that the planning system could give practical effect to the asserted rights where relevant material considerations were lawfully recognised and determined, while their weight remained for the LA/LPA. (Annex §10.4, p.20)
- E5. FINAL BREXIT SAFEGUARD AND UNRESOLVED POSITION
1. After the judicial route closed, we pursued REULA 2023 s.7 as the third and final Brexit safeguard before its 23 June 2026 sunset. We made submissions on 26 November 2025, 14 January and 17 February 2026, seeking administrative resolution and offering mediation or ADR. (Annex §5.4, p.7; Attachments 21–23, bundle pp.331–435).
2. Our 18 April 2026 request asked whether the submissions were being considered under s.7 and sought substantive responses to the six previous requests. DHSC and DSIT responded on 28–29 May 2026; DHSC relied on UKHSA reassurance that exposure remained low relative to ICNIRP guidelines and stated that Ofcom was the sole designated telecoms national regulatory authority, without identifying who was responsible for the planning-stage examination of site-specific public-health and environmental evidence. (COR18/4, RES28/5 and RES29/5; Attachment 24, bundle pp.436–440)
3. The two rights we asserted therefore remained without a legally effective domestic procedure through which they could operate before authorisation. No domestic authority or court identified who was responsible for performing the EECC planning-stage public-health function required to make those rights practical and effective.
4. On 17 August 2026 the replacement NPPF retained ICNIRP compliance for telecommunications.

F. Statement of alleged violation(s) of the Convention and/or Protocols and relevant arguments

61. Article invoked	Explanation
Article 6 § 1 — denial of access to a court and a fair hearing	We complain that we were denied an effective opportunity to have our constrained administrative claim determined by a court. The claim raised arguable questions concerning the operation of EUWA 2018 Schedule 8 paragraphs 39(5) and 39(6), the allocation and performance of EECC public health functions, and the domestic administrative remedies sought. On 26 April 2024, the High Court refused permission and certified the claim Totally Without Merit (“TWM”). That certification removed the ordinary opportunity to renew the application at an oral hearing. We were therefore unable to address at an oral hearing the decisive objections concerning time, preclusion and direct effect, or to explain why those objections did not answer the administrative omission claim actually advanced. Mischaracterisation was then carried through into the appellate process. Applications seeking reopening and clarification were refused or were not substantively determined because there was said to be no live appeal. We maintain that procedural finality was reached without an oral hearing or judicial determination of the materially different claim we had brought. The interaction between judicial mischaracterisation, “TWM” certification and closure of the available procedural routes impaired the essence of our right of access to a court and denied us a fair opportunity to present our case.
Article 13, taken together with Articles 6 and 8 — absence of an effective remedy	We complain that no effective domestic remedy was available by which the alleged mischaracterisation could be corrected and the administrative issue determined. TWM certification removed oral renewal. The CPR 52.30 applications did not secure reopening. The later application concerning the EUWA 2018 section 6D incompatibility mechanism was not substantively determined because there was said to be no live appeal. The Court of Appeal stated that no further right of appeal existed, and the Supreme Court refused permission. After the judicial route closed, we pursued REULA 2023 section 7 submissions and repeatedly offered ADR. The departmental replies did not identify the authority or procedure responsible for performing the LA/LPA EECC competent authority public health protection functions before authorisation. We therefore maintain that we had no effective remedy capable either of securing determination of the arguable legal claim or for obtaining the practical administrative protection sought.
Article 8 — private life, home and physical integrity	We complain that the alleged regulatory omission concerns functions intended to protect individuals in relation to telecommunications deployment capable of affecting their private life, home and physical integrity. Our case was supported by proposal specific evidence showing that exposure-zone information relevant to neighbouring property was not routinely obtained or examined, and that evidence concerning risks not resolved by an ICNIRP declaration lacked a clear route for assessment before authorisation. Our complaint is that the State failed to provide a clear and effective legal and administrative process by which site specific public health and environmental evidence could be examined, relevant public health conditions considered, and the asserted rights made practical and effective at the authorisation stage. No authority was identified as responsible for performing that planning-stage function. We maintain that the continuing absence of such a process, combined with the absence of a substantive domestic determination, failed to provide the procedural protection required in respect to our Article 8 interests, and the interest of the general public.
	Matters of public interest raised in our 13 March 2025 request for permission to appeal to the Supreme Court (SCA13/3) are referenced in Annex §5.13, p.9).
	I was previously an applicant in Rock and Others v the United Kingdom, no. 43108/23, as disclosed in section H.

62. Article invoked	Explanation That earlier application, was lodged on 8 December 2023, with the Convention arguments advanced by Philip Rule KC, and was declared inadmissible on 30 May 2024. It concerned the State’s general duties to investigate and provide information about potential 5G health risks. Its inadmissibility did not resolve how risks falling outside the ICNIRP exposure guidelines, including those concerning metal and medical implants, were to be assessed before authorisation. That issue subsequently arose in <i>Thomas v Cheltenham Borough Council</i>. Jarman KC distinguished between the evidence concerning a pacemaker at the more distant Lefroy Court and the position of residents living approximately 17 metres from the proposed mast. Jarman KC held that the ICNIRP guidelines “do not address the issue of potential harm caused by EMFs in relation to medical implants” (§41). He concluded that “the failure on the part of the authority to grapple with potential impacts on medical implants was, in my judgment, an error and this ground succeeds” (§43). In considering whether that error might have affected the outcome, he observed that the issue had not been raised in relation to the residences closest to the proposed mast and stated: “If it had been so raised, then it may well have been a factor in a decision to re-site the equipment” (§46). One such residence was approximately 17 metres from the proposed mast, and the resident had metal clips but had not disclosed them in her objection. Relief was refused because that potentially outcome-changing evidence had not been placed before the Council. The judgment nevertheless demonstrates that site-specific implant evidence falling outside ICNIRP was capable of affecting the siting decision. (Attachment bundle pp.79–80 and 366–367.) Thomas therefore provides a concrete example of the systemic lacuna alleged in this application: because no authority had been clearly identified and equipped to assess site-specific evidence falling outside ICNIRP before authorisation, the issue remained unresolved at the planning stage and emerged only through judicial review. Had that function been made operational, litigation on this issue might have been avoided.
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For each complaint, please confirm that you have used the available effective remedies in the country concerned, including appeals, and also indicate the date when the final decision at domestic level was delivered and received, to show that you have complied with the four-month time-limit.

[illegible]

☐ Yes

65. If you answered Yes above, please state which appeal or remedy you have not used and explain why not.

66. Have you raised any of these complaints in another procedure of international investigation or settlement?

☐ Yes

☐ No

67. If you answered Yes above, please give a concise summary of the procedure (complaints submitted, name of the international body and date and nature of any decisions given)

68. Do you (the applicant) currently have, or have you previously had, any other applications before the Court?

☒ Yes☐ No

69. If you answered Yes above, please write the relevant application number(s) in the box below

Rock and Others v the United Kingdom, application no. 43108/23 — lodged 8 December 2023; declared inadmissible 30 May 2024

I. List of accompanying documents

You should enclose full and legible *copies* of all documents. No documents will be returned to you. It is thus in your interests to submit copies, not originals. You MUST:

- arrange the documents in order by date and by set of proceedings;
- number the pages consecutively; and
- NOT staple, bind or tape the documents.

70. In the box below, please list the documents in chronological order with a concise description. Indicate the page number at which each document may be found

1.	Pre-action Submission (SUB13/9) — 13 September 2023	p.	1
2.	Original Judicial Review Application, Statement of Facts and Grounds (JRA20/12, SoF20/12, GR20/12) 20 December 2023	p.	82
3.	CPR 18 Clarification / Claimants' Response (CPR18) — 16 January 2024	p.	112
4.	Defendants' Responses — (JRAR1 25/1 — DoH&SC; JRAR2 25/1 — DLUHC / DSIT) — 25 January 2024	p.	122
5.	High Court Permission Refusal and TWM Order (JJO26/4) — 26 April 2024	p.	139
6.	Court of Appeal Application, Grounds and Skeleton Argument (AN6/5, GR6/5, SK6/5) — 6 May 2024	p.	142
7.	Falk LJ Order refusing permission to appeal (JF01) — 31 July 2024	p.	195
8.	CPR 52.30 Reopening Application and Grounds (AP4/9, GR4/9) — 4 September 2024	p.	198
9.	Falk LJ Order refusing CPR 52.30 reopening application (JF02) — 31 October 2024	p.	212
10.	Further Reopening Application and Grounds (AP28/11, GR28/11) — 28 November 2024	p.	214
11.	Falk LJ Order refusing further reopening application and certifying TWM (JF03) — 19 December 2024	p.	242
12.	EUWA 2018 Section 6D Application and supporting Grounds (AP22/1, GR22/1) — 22 January 2025	p.	244
13.	Master Bancroft-Rimmer Directions / no-live-proceedings determination (MB-R24/1) — 24 January 2025	p.	276
14.	Further Pleadings (CoP29/1) — 29 January 2025	p.	279
15.	Dingemans LJ No-Jurisdiction Decision (LJD7/2) — 7 February 2025	p.	289
16.	Request to Court of Appeal for Permission to Appeal to the Supreme Court (PCA-SC24/2) — 24 February 2025	p.	291
17.	Court of Appeal Responses: No Further Right of Appeal (NFA26/2) — 25–26 February 2025	p.	306
18.	Supreme Court Application (SCA13/3) — March 13 2025	p.	308
19.	Supreme Court Refusal of Permission (SCO4/7) — 4 July 2025	p.	328
20.	Request to Supreme Court for Clarification / Reasons (RtSC16/7) — 16 July 2025	p.	329
21.	REULA 2023 Section 7 Submissions (SUB26/11) (Piper letter p.392)— 26 November 2025	p.	331
22.	REULA 2023 Section 7 Submissions (SUB14/1, —14 January	p.	397
23.	REULA 2023 Section 7 Submissions (SUB17/2) — 217 February 2026	p.	406
24.	Section 7 Clarification Request and Departmental Replies (COR18/4 (p.436), RES28/5(p.440), RES29/5 (p.441), RES6/6) (p.441), — 18 April, 28 May, 29 May , June 18 2026 p 436,	p.	436
25.		p.	

Any other comments

Do you have any other comments about your application?

71. Comments

Declaration and signature

I hereby declare that, to the best of my knowledge and belief, the information I have given in the present application form is correct.

72. Date

2	5	0	8	2	0	2	6	e.g. 27/09/2015
D	D	M	M	Y	Y	Y	Y	

The applicant(s) or the applicant’s representative(s) must sign in the box below.

73. Signature(s) ☐ Applicant(s) ☐ Representative(s) - tick as appropriate

Confirmation of correspondent

If there is more than one applicant or more than one representative, please give the name and address of the one person with whom the Court will correspond. Where the applicant is represented, the Court will correspond only with the representative (lawyer or non-lawyer).

74. Name and address of ☒ Applicant ☐ Representative - tick as appropriate

Neil McDougall

[REDACTED]

The completed application form should be signed and sent by post to:

The Registrar
European Court of Human Rights
Council of Europe
67075 STRASBOURG CEDEX
FRANCE

