IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Before: The Honourable Mr Justice Morris On: the 3rd day of May 2023

BETWEEN

TRANSPORT FOR LONDON

<u>Claimant</u>

-and-

(1) PERSONS UNKNOWN DELIBERATELY CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE 1) HANGER LANE GYRATORY INCLUSIVE OF ALL ADJOINING ENTRY AND EXIT SLIPS; 2) VAUXHALL BRIDGE INCLUDING VAUXHALL GYRATORY AND ALL ENTRY AND EXIT ROADS; 3) HAMMERSMITH GYRATORY INCLUSIVE OF ALL ADJOINING ENTRY AND EXIT ROADS; 4) BLACKWALL TUNNEL AND BOTH APPROACHES; 5) TOWER BRIDGE AND BOTH APPROACHES; 6) LONDON BRIDGE AND BOTH APPROACHES; 7) PARK LANE, INCLUSIVE OF MARBLE ARCH AND HYDE PARK CORNER; 8) ELEPHANT AND CASTLE INCLUSIVE OF ALL ENTRY AND EXIT ROADS; 9) VICTORIA ONE WAY SYSTEM; 10) A501/INNER RING ROAD FROM EDGWARE ROAD TO OLD STREET; 11) STAPLES CORNER; 12) CHISWICK ROUNDABOUT; 13) REDBRIDGE ROUNDABOUT; 14) KIDBROOKE INTERCHANGE, FOR THE PURPOSE OF PROTESTING ON BEHALF OF, IN ASSOCIATION WITH, UNDER THE INSTRUCTION OR DIRECTION OF, OR USING THE NAME OF, INSULATE BRITAIN

(2) MR ALEXANDER RODGER AND OTHER DEFENDANTS LISTED IN THE SCHEDULE TO THE CLAIM FORM

Defendants

Claim No: QB-2021-004122

AND BETWEEN

TRANSPORT FOR LONDON

Claimant

-and-

(1) PERSONS UNKNOWN DELIBERATELY CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE 1) LAMBETH BRIDGE AND BOTH ADJOINING ROUNDABOUTS; 2) HOGARTH ROUNDABOUT INCLUSIVE OF ALL ADJOINING ENTRY AND EXIT ROADS; 3) MARBLE ARCH INCLUSIVE OF ALL ENTRY AND EXIT ROADS; 4) ROTHERHITHE TUNNEL AND BOTH APPROACHES; 5) BECKTON ROUNDABOUT; 6) GANTS HILL ROUNDABOUT; 7) BRIXTON; 8) A406 (KNOWN AS THE NORTH CIRCULAR) BETWEEN AND INCLUSIVE OF ALL **INTERSECTIONS WITH THE A40 HANGER LANE TO THE A13 ALFRED'S WAY INCLUSIVE OF ALL INTERSECTIONS; 9) A1 BETWEEN AND INCLUSIVE OF ALL** INTERSECTIONS WITH THE A406 AT GREAT NORTH WAY TO ELSTREE WAY, BOREHAM WOOD; 10) A10 GREAT CAMBRIDGE ROAD BETWEEN AND INCLUSIVE OF ALL INTERSECTIONS WITH THE A406 NORTH CIRCULAR ROAD TO THE GLA ROAD BOUNDARY AT M25 JUNCTION 25; 11) A12 APPROACH TO BLACKWALL TUNNEL INCLUSIVE OF ALL INTERSECTIONS TO GLA BOUNDARY AT M25 J28; 12) A127 BETWEEN AND INCLUSIVE OF ALL INTERSECTIONS WITH THE A12 AT GALLOWS CORNER TO THE GLA ROAD BOUNDARY AT M25 J29; 13) A13/A1203/A1261 BETWEEN LIMEHOUSE LINK (INCLUSIVE) AND M25 JUNCTION 30 INCLUSIVE OF



ALL INTERSECTIONS WITH THE BLACKWALL TUNNEL TO THE GLA ROAD **BOUNDARY; 14) A102 APPROACH TO BLACKWALL TUNNEL INCLUSIVE OF ALL** INTERSECTIONS THAT PROVIDE ENTRY AND EGRESS TO THE TUNNEL SOUTH AND NORTH SIDES; 15) A3 BETWEEN AND INCLUSIVE OF ALL INTERSECTIONS AT THE WANDSWORTH GYRATORY TO THE HOOK ROAD JUNCTION WHERE IT **MEETS THE A309; 16) A40 BETWEEN AND INCLUSIVE OF ALL INTERSECTIONS** WITHIN THE INNER RING ROAD AT A5 EDGWARE ROAD / HARROW ROAD TO THE GLA BOUNDARY; 17) A2 OLD BEXLEY LANE TO BLACKWALL TUNNEL INCLUSIVE **OF ALL INTERSECTIONS; 18) A4 HYDE PARK CORNER INCLUSIVE OF ALL INTERSECTIONS TO KEW BRIDGE; 19) A302 WESTMINSTER BRIDGE BETWEEN** BRIDGE STREET / VICTORIA EMBANKMENT AND WESTMINSTER BRIDGE ROAD / LAMBETH PALACE ROAD; 20) A201 BLACKFRIARS BRIDGE BETWEEN NEW BRIDGE STREET AND BLACKFRIARS ROAD AND SOUTHWARK STREET/STAMFORD STREET, FOR THE PURPOSE OF PROTESTING ON BEHALF OF, IN ASSOCIATION WITH, UNDER THE INSTRUCTION OR DIRECTION OF, OR USING THE NAME OF, **INSULATE BRITAIN**

(2) MR ALEXANDER RODGER AND OTHER DEFENDANTS LISTED IN THE SCHEDULE TO THE CLAIM FORM

Defendants

FINAL INJUNCTION ORDER

PENAL NOTICE

IF YOU THE NAMED DEFENDANTS AND PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON READING among other things the Claimant's Skeleton Argument dated 14 March 2023, the Witness Statements of Abbey Ameen including exhibits dated 27 February 2023, 2 April 2023 and 28 April 2023 and the Witness Statement of Glynn Barton dated 27 February 2023

AND UPON HEARING in the Trial of these Claims: Counsel for the Claimant, Andrew Fraser-Urquhart KC and Charles Forrest, and Named Defendants 9 and 135 (as defined and identified in Annex 1 to the Claim Forms herein) who attended unrepresented for part of Day 1 of Trial

AND UPON the Claimant confirming that this Order is not intended to prohibit lawful protest onto, off or along the Roads to which this Order relates

IT IS ORDERED THAT:

- 1. In this Final Injunction Order, except in the second recital above, the "Named Defendants" are those Defendants whose names appear in the schedule annexed to this Order (Annex 1). The term "Defendants" refers to both "persons unknown" and the Named Defendants, as defined.
- 2. For the purposes of this Order, 'the Roads' means the Roads identified by the descriptions and plans annexed to this Order (Annex 2) including any verges, central reservations, and any apparatus related to those Roads.
- 3. This Final Injunction Order consolidates and replaces the Interim Injunctions in these Claims made by Cotter J on 11 October 2022 (sealed on 13 October 2022), which are discharged with effect from today.

Injunction in force

- 4. With immediate effect until the earlier of (i) 23:59 on 2 May 2028, or (ii) Further Order, the Defendants and each of them are forbidden from deliberately undertaking the following activities:
 - a. Blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
 - b. Blocking, slowing down, obstructing or otherwise interfering with access to or from the Roads for the purpose of protesting which has the effect of slowing down or otherwise interfering with the flow of traffic onto or along or off the Roads.
 - c. Causing, assisting or encouraging any other person to do any act prohibited by subparagraphs a-b above.
 - d. Continuing any act prohibited by sub-paragraphs a-c above.
 - e. For the avoidance of doubt, this wording does not apply to the practice of 'slow marching' on the road

- 5. The activities prohibited by paragraphs 4a-b include, but are not limited to, the following when done for the purpose of protesting and with the deliberate effect of blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads:
 - a. Affixing themselves ("locking on") to any other person or object on the Roads or to the surface of the Roads
 - b. Erecting any structure on the Roads.
 - c. Tunnelling in the vicinity of the Roads.
 - d. Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.
 - e. Causing damage to the surface of or to any apparatus on or around the Roads or any structure supporting the Roads including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
- 6. The publication by the Claimant of any orders or other documents (such as the Claim Form or Particulars of Claim) in these proceedings shall not include (in the published version) the addresses of the Named Defendants. Liberty to any of the Named Defendants on prior notice to the Claimant to apply for any wider protection as regards the addresses
- 7. The Claimant shall:
 - a. Place a copy of this Order on the TfL and Mayor of London/GLA London.gov.uk websites; and
 - b. Email a copy of this Order to:
 - i. Insulate Britain's email addresses <u>ring2021@protonmail.com</u> and <u>insulatebritainlegal@protonmail.com</u>
 - ii. Just Stop Oil's email addresses: juststopoil@protonmail.com and juststopoilpress@protonmail.com
 - iii. Extinction Rebellion's email address: press@extinctionrebellion.uk
 - iv. Animal Rebellion email addresses: <u>actions@animalrebellion.org</u>, <u>fundraising@animalrebellion.org</u>, <u>integration@animalrebellion.org</u>, <u>talks@animalrebellion.org</u>, <u>global@animalrebellion.org</u>, <u>localgroups@animalrebellion.org</u>, <u>media@animalrebellion.org</u>, <u>governance@animalrebellion.org</u>, <u>pressoffice@animalrebellion.org</u>, <u>finance@animalrebellion.org</u> and <u>techsupport@animalrebellion.org</u>;
 - c. Publish a social media post on the TfL Twitter feed advertising the existence of this Order and providing a link to the TfL website webpage where it can be viewed
 - d. Send a notification of the existence of this Order to the Press Association
 - e. Place a notice of this Order in the London Gazette

8. For the avoidance of doubt, compliance with paragraph 7 shall not constitute service.

Alternative Service

- 9. The Claimant is permitted, in addition to personal service and any other permitted mode of service as the case may be, to serve this Order, the Claim Form, and any other documents in these proceedings by both of the following methods together (thereby dispensing with personal service of this Order for the purposes of CPR r81.4(2)(c)):
 - a. Service on Insulate Britain by email; and
 - b. Posting a package containing a copy through the letterbox (or a separate mailbox if there is no letterbox) of each Defendant, or, if the premises do not have a letterbox or mailbox, affixing a waterproof package containing a copy to the front door. In either case, the package should be marked with a notice in prominent lettering drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The Notice shall be given in the following form: "VERY URGENT: THIS PACKAGE CONTAIN AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL Mr Abbey Ameen of TfL on 02030547921"
- 10. Where alternative service is used, pursuant to CPR r6.15(4) and r6.27, a document is deemed served on the third business day following completion by the Claimant of the later of the following (see 9a-b above): email of it to Insulate Britain or delivery of it to/collection of it by the process server chosen to carry out alternative service under paragraph 9b of this Order.

Further directions

- 11. There shall be every 12 months for as long as this Final Injunction Order is in force, a hearing to review this Final Injunction Order. The Claimant shall liaise with the Court to list such hearings and inform the Defendants of any such listing as soon as practicable.
- 12. 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 immediately (and in any event not less than 28 days before the hearing of any such application).

- 13. Any person applying to vary or discharge this Order must provide their full name and address, an address for service.
- 14. Any person who applies to vary or discharge this Order shall file a skeleton argument and any evidence to be relied upon no later than 14 days before the application hearing.
- 15. The Claimant has permission to apply to extend or vary this Order or for further directions.

Communications with the Claimant

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

FAO Mr Abbey Ameen Team Legal, Transport for London, 5 Endeavour Square, 4th Floor, Stratford, Yellow Zone, Stratford, E20 1JN Tel: 02030547921

BY THE COURT

The Honourable Mr Justice Morris

Dated: 3 May 2023

ANNEX 1 TO FINAL INJUNCTION IN CLAIM NO. QB-2021-003841 & CLAIM NO. QB-2021-004122– SCHEDULE OF NAMED DEFENDANTS SUBJECT TO THE FINAL INJUNCTION ORDER

	Name	Address
1	Alexander RODGER	
2	Alyson LEE	
3	Amy PRITCHARD	
4	Ana HEYATAWIN	
5	Andrew WORSLEY	
6	Anne TAYLOR	
7	Anthony WHITEHOUSE	
8		
9		
10	Ben TAYLOR	
11	Benjamin BUSE	
12	Biff William Courtenay WHIPSTER	
13	Cameron FORD	
14	Catherine RENNIE- NASH	
15	Catherine EASTBURN	
16	Christian MURRAY- LESLIE	

17	Christian ROWE	
18	Cordelia ROWLATT	
19	Daniel SARGISON	
20	Daniel SHAW	
21	David CRAWFORD	
22	David JONES	
23	David NIXON	
24	David SQUIRE	
25	Diana BLIGH	
26	Diana HEKT	
27	Diana Lewen WARNER	
28	Donald BELL	
29	Edward HERBERT	
30	Elizabeth ROSSER	
31	Emily BROCKLEBANK	
32	Emma Joanne SMART	
33	Gabriella DITTON	
34		
35	Gwen HARRISON	

36	Harry BARLOW	
37	Ian BATES	
38	Ian Duncan WEBB	
39	James BRADBURY	
40	James SARGISON	
41	James THOMAS	
42	Janet BROWN	
43	Janine EAGLING	
44	Jerrard Mark LATIMER	
45	Jessica CAUSBY	
46	Jonathan COLEMAN	
47	Joseph SHEPHERD	
48	Joshua SMITH	
49	Judith BRUCE	
50	Julia MERCER	
51	Julia SCHOFIELD	
52	Karen MATTHEWS	
53	Karen WILDIN	

54	Liam NORTON	
55	Louis MCKECHNIE	
56	Louise Charlotte LANCASTER	
57	Lucy CRAWFORD	
58	Mair BAIN	
59	Margaret MALOWSKA	
60	Marguerite DOUBLEDAY	
61	Maria LEE	
62	Martin NEWELL	
63	Mary ADAMS	
64	Matthew LUNNON	
65		
66	Meredith WILLIAMS	
67	Michael BROWN	
68	Michael WILEY	
69	Michelle CHARLSWORTH	
70	Natalie MORLEY	
71	Nathaniel SQUIRE	
72	Nicholas COOPER	

73	Nicholas ONLEY	
74	Nicholas TILL	
75	Oliver ROCK	
76	Paul COOPER	
77	Paul SHEEKY	
78	Peter BLENCOWE	
79	Peter MORGAN	
80	Phillipa CLARKE	
81	Priyadaka CONWAY	
82	Richard RAMSDEN	
83	Rob STUART	
84	Robin COLLETT	
85	Roman Andrzej PALUCH-MACHNIK	
86	Rosemary WEBSTER	
87	Rowan TILLY	
88	Ruth Ann COOK	
89	Ruth JARMAN	
90	Sarah HIRONS	

91		
92	Simon REDING	
93	Stefania MOROSI	
94	Stephanie AYLETT	
95	Stephen GOWER	
96	Stephen PRITCHARD	
97	Sue CHAMBERS	
98	Sue PARFITT	
99	Sue SPENCER- LONGHURST	
100	Susan HAGLEY	
101	Suzie WEBB	
102		
103	Tessa-Marie BURNS	
104	Theresa NORTON	
105	Tim SPEERS	
106	Tim William HEWES	
107	Tracey MALLAGHAN	
108		
109	Valerie SAUNDERS	

110	Venitia CARTER	
111	Victoria Anne	
	LINDSELL	
112		
113	Bethany MOGIE	
114	Indigo RUMBELOW	
114		
115	Adrian TEMPLE-	
	BROWN	
116	Ben NEWMAN	5
117	Christopher PARISH	
118	Elizabeth SMAIL	
119	Julian MAYNARD	
117	SMITH	
120	Rebecca LOCKYER	
121	Simon MILNER- EDWARDS	
122	Stephen BRETT	
123	Virginia MORRIS	
125	virginia WORRDS	
124	Jan GOODEY	
125	Alex GOUGH	
126	Gareth Richard HARPER	
105		
127	Samuel JOHNSON	

128	Giovanna LEWIS	
129	Susan LYLE	
130	Darcy MITCHELL	
131	Morien MORGAN	
132	Lucia WHITTAKER DE ABREU	
133	Pam WILLIAMS	
134	Molly BERRY	
135		
136	Ellie LITTEN	
137	George BURROW	
138	Jonathan HEBERT	

Information as of 21 June 2022 - Blackwall Tunnel and both approaches



ANNEX 2 TO FINAL INJUNCTION IN CLAIM NO. QB-2021-003841 & CLAIM IO. QB-2021-004122— PLANS OF THE ROADS PROTECTED UNDER THIS INJUNCTION



Information as of 21 June 2022 - Chiswick Roundabout





Information as of 21 June 2022 - Hammersmith Gyratory Inclusive of all adjoining entry and exit roads





Climate Protest Injunction - Key Areas Information as of 21 June 2022 - Hanger Lane Gyratory Inclusive of all adjoining entry and exits points





Information as of 21 June 2022 - A501 Edgware Road to Old Street



TRANSPORT FOR LONDON

Information as of 21 June 2022 - Kidbrooke Interchange





Climate Protest Injunction - Key Areas Information as of 21 June 2022 - London Bridge and both approaches





Information as of 21 June 2022 - Tower Bridge and both approaches





Information as of 21 June 2022 - Vauxhall Bridge including Vauxhall Gyratory and all entry and exit roads





Information as of 21 June 2022 - Marble Arch Inclusive of all entry and exit roads





Information as of 21 June 2022 - Park Lane, inclusive of Marble Arch and Hyde Park Corner





Information as of 21 June 2022 - Redbridge Roundabout





Climate Protest Injunction - Key Areas Information as of 21 June 2022 - Staples Corner





Information as of 21 June 2022 - Victoria One Way system





Climate Protest Injunction - Key Areas Information as of 21 June 2022 - Elephant and Castle Inclusive of all entry and exit roads.





Information as of 27 May 2022 - Lambeth Bridge and Both adjoining roundabouts



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Climate Protest Injunction - Key Areas Information as of 27 May 2022 - Hogarth Roundabout





Information as of 27 May 2022 - Marble Arch



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Information as of 27 May 2022 - Beckton Roundabout







Information as of 27 May 2022 - Brixton



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Information as of 21 June 2022



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