

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No. KB-2022-003542

Before: The Honourable Mr Justice Eyre

On: 8 June 2023

B E T W E E N:

TRANSPORT FOR LONDON

-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) VAUXHALL BRIDGE INCLUDING VAUXHALL GYRATORY AND ALL ENTRY AND EXIT ROADS; 2) LAMBETH BRIDGE AND BOTH ADJOINING ROUNDABOUTS; 3) A1221 MILLBANK; 4) A4 - KNIGHTSBRIDGE & SCOTCH CORNER; 5) A202 ST GEORGE'S CIRCUS AND APPROACH ROADS; 6) A10 SHOREDITCH HIGH STREET, A1202 GREAT EASTERN STREET, A3201 OLD STREET; 7) A3211 VICTORIA EMBANKMENT; 8) LONDON BRIDGE AND BOTH APPROACHES; 9) TOWER BRIDGE AND BOTH APPROACHES; 10) ROTHERHITHE TUNNEL AND BOTH APPROACHES; 11) BLACKWALL TUNNEL & BOTH APPROACHES; 12) PARK LANE INCLUSIVE OF MARBLE ARCH AND HYDE PARK CORNER; 13) A302 WESTMINSTER BRIDGE BETWEEN BRIDGE STREET/VICTORIA EMBANKMENT AND WESTMINSTER BRIDGE ROAD/LAMBETH PALACE ROAD; 14) A501 EDGWARE ROAD TO OLD STREET; 15) VICTORIA ONE WAY SYSTEM; 16) ELEPHANT AND CASTLE INCLUSIVE OF ALL ENTRY AND EXIT ROADS; 17) BLACKFRIARS BRIDGE BETWEEN NEW BRIDGE STREET AND BLACKFRIARS ROAD AND SOUTHWARK STREET/STAMFORD STREET; 18) A4 TALGARTH ROAD IN THE VICINITY OF BARONS COURT TUBE STATION; 19) HANGER LANE GYRATORY INCLUSIVE OF ALL ADJOINING ENTRY AND EXIT SLIPS; 20) STAPLES CORNER; 21) CHISWICK ROUNDABOUT; 22) REDBRIDGE ROUNDABOUT; 23) KIDBROOKE INTERCHANGE, FOR THE PURPOSES OF PROTESTING ON BEHALF OF, IN ASSOCIATION WITH, UNDER THE INSTRUCTION OR DIRECTION OF, OR USING THE NAME OF, JUST STOP OIL

(2) MS ALYSON LEE 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 19 April 2023, the Witness Statements of Abbey Ameen including exhibits dated 2 April 2023 and 3 May 2023, and the Witness Statement of Glynn Barton dated 24 March 2023

AND UPON HEARING in the Trial of this Claim: Counsel for the Claimant, Andrew Fraser-Urquhart KC and Charles Forrest, and Named Defendants 8, 63, 65, 74, 102, 110, 140, 143, 145 (as defined and identified in Annex 1 to the Claim Form in these proceedings, as amended)

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 (Annex 2 and 3)

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 in this paragraph.
2. For the purposes of this Order:
 - a. in the case of Named Defendants 84, 137, and 142 and Persons Unknown, 'the Roads' means those roads identified by the descriptions and plans annexed to this Order at Annex 2;
 - b. in the case of Named Defendants 3, 7, 20, 45 46, 51, and 56, 'the Roads' means only those roads identified by the descriptions and plans annexed to this Order at Annex 3;
 - c. in either of the above case, 'the Roads' includes any verges, central reservations, and any apparatus related to those Roads.

3. This Final Injunction Order replaces the Interim Injunction in this Claim made by Cavanagh J on 24 February 2023 (sealed on 27 February 2023), which is 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 sub-paragraphs 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. Just Stop Oil's email addresses: juststopoil@protonmail.com and juststopoilpress@protonmail.com
 - ii. Insulate Britain's email addresses ring2021@protonmail.com and insulatebritainlegal@protonmail.com
 - iii. Extinction Rebellion's email address: press@extinctionrebellion.uk
 - iv. Animal Rebellion email addresses: actions@animalrebellion.org, fundraising@animalrebellion.org, integration@animalrebellion.org, talks@animalrebellion.org, global@animalrebellion.org, localgroups@animalrebellion.org, media@animalrebellion.org, governance@animalrebellion.org, pressoffice@animalrebellion.org, finance@animalrebellion.org and techsupport@animalrebellion.org;
 - 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 Just Stop Oil 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 paragraph 9a-b above): email of it to Just Stop Oil 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 Eyre

Dated: 8 June 2023

**ANNEX 1 TO FINAL INJUNCTION ORDER MADE IN CLAIM NO. KB-2022-003542-
SCHEDULE OF NAMED DEFENDANTS SUBJECT TO THE FINAL INJUNCTION ORDER**

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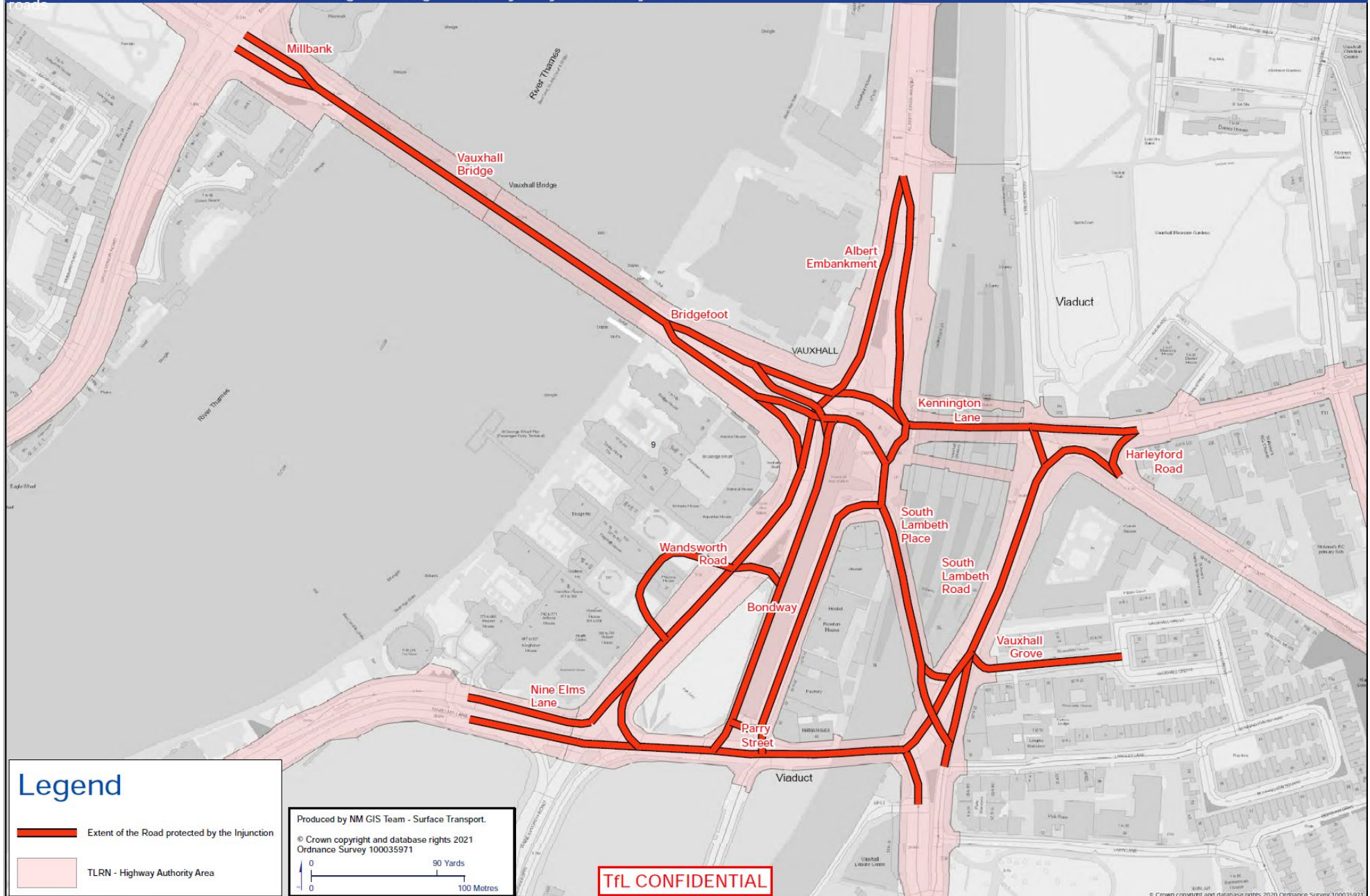
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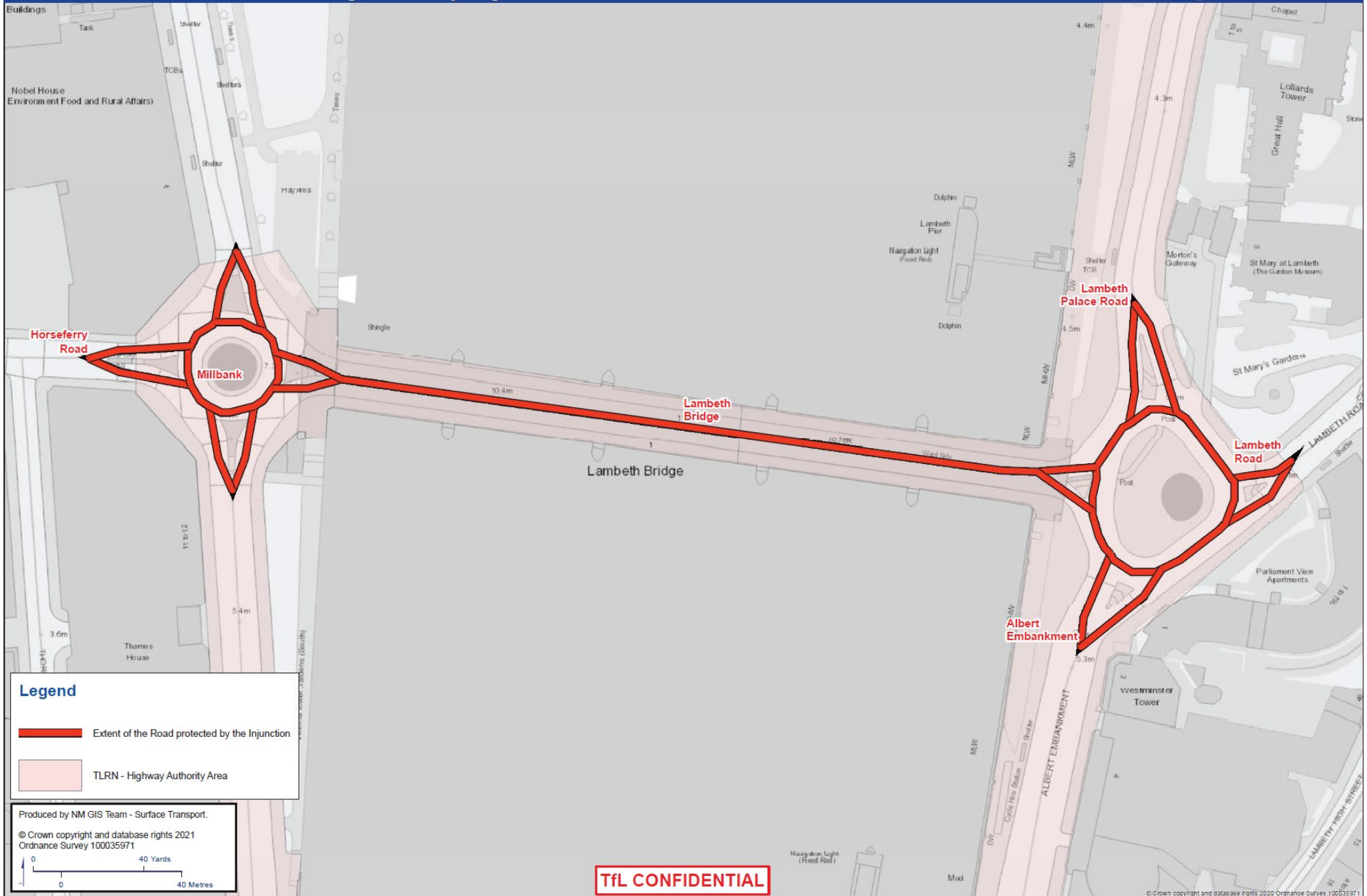
Climate Protest Injunction - Key Areas

Information as of 16 October 2022 - Vauxhall Bridge including Vauxhall Gyratory and all entry and exit roads



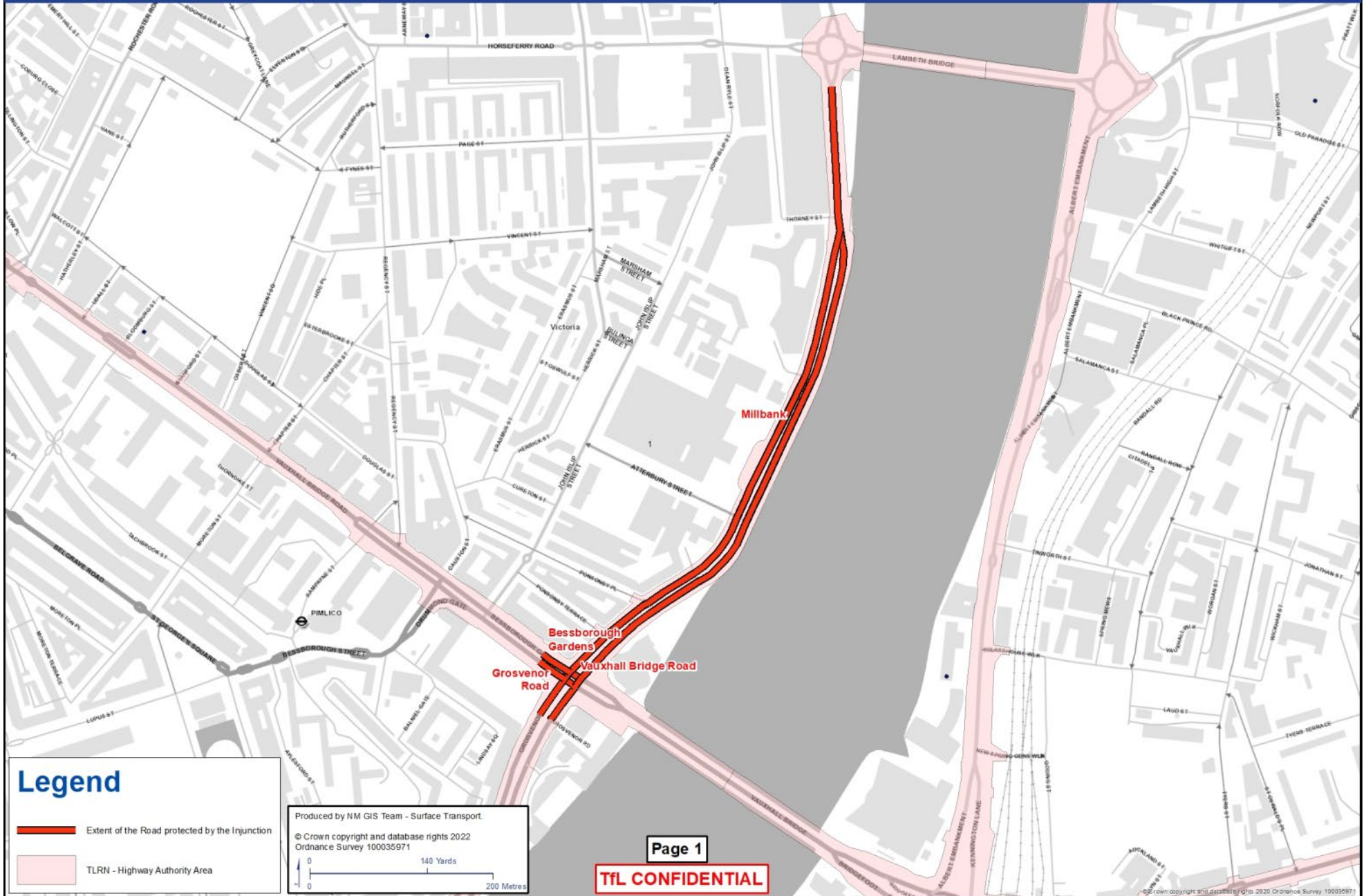
Climate Protest Injunction - Key Areas

Information as of 16 October 2022 - Lambeth Bridge and Both adjoining roundabouts



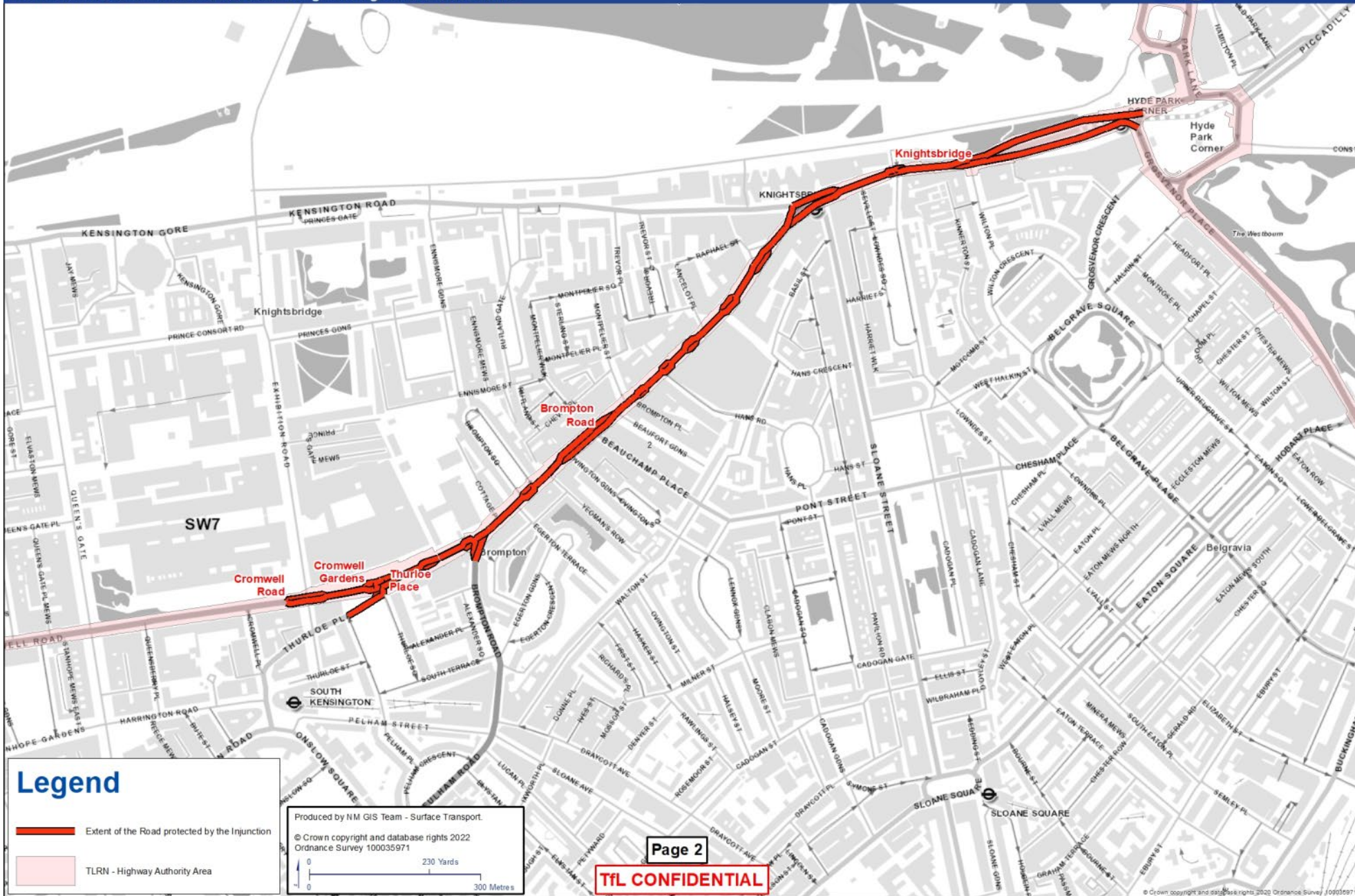
Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - A2212 - Millbank



Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - A4 – Knightsbridge and Scotch corner



Legend

- Extent of the Road protected by the Injunction
- TLRN - Highway Authority Area

Produced by NM GIS Team - Surface Transport.

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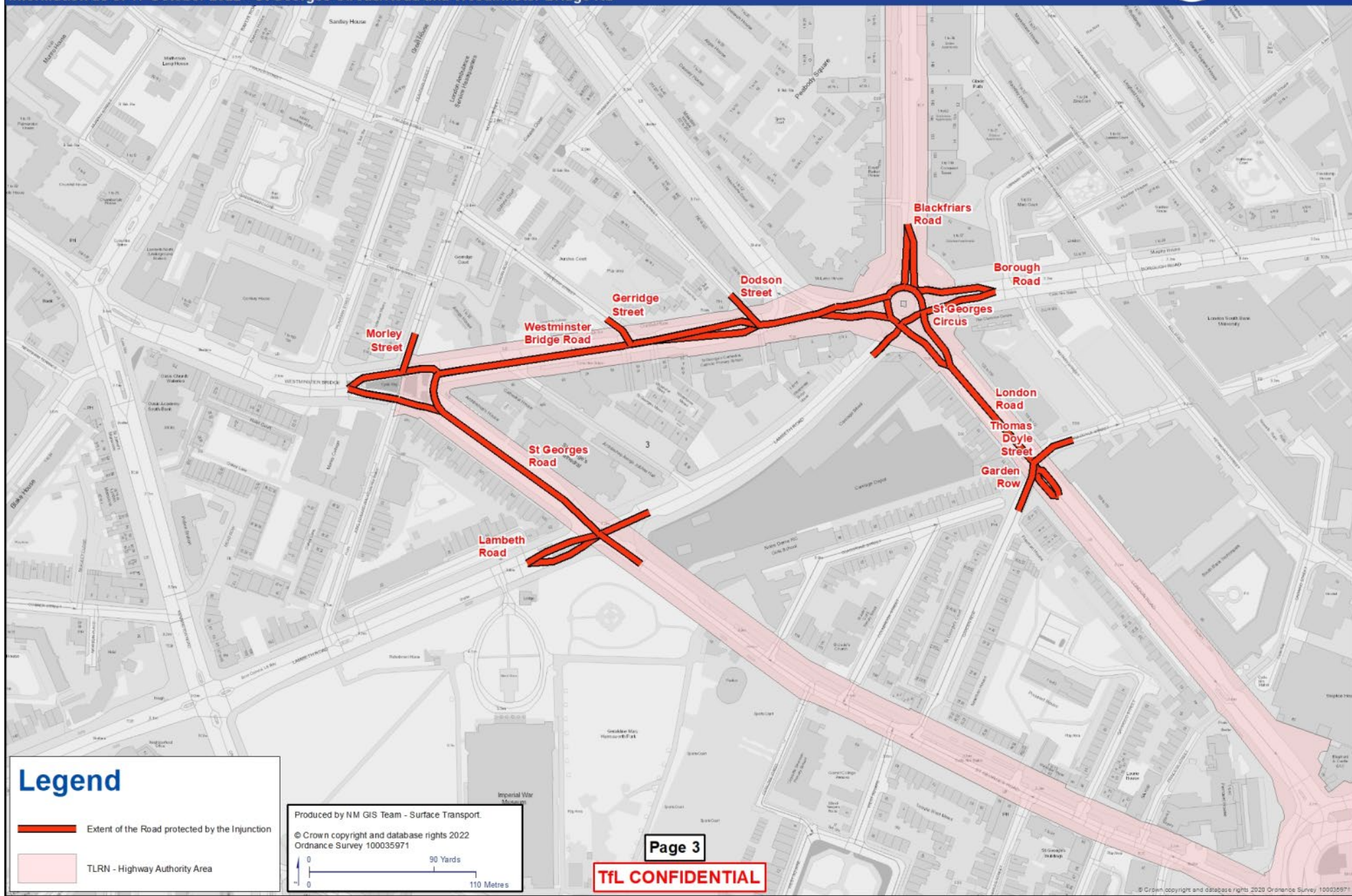
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Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - St Georges Circus/Road and Westminster Bridge Rd



Legend

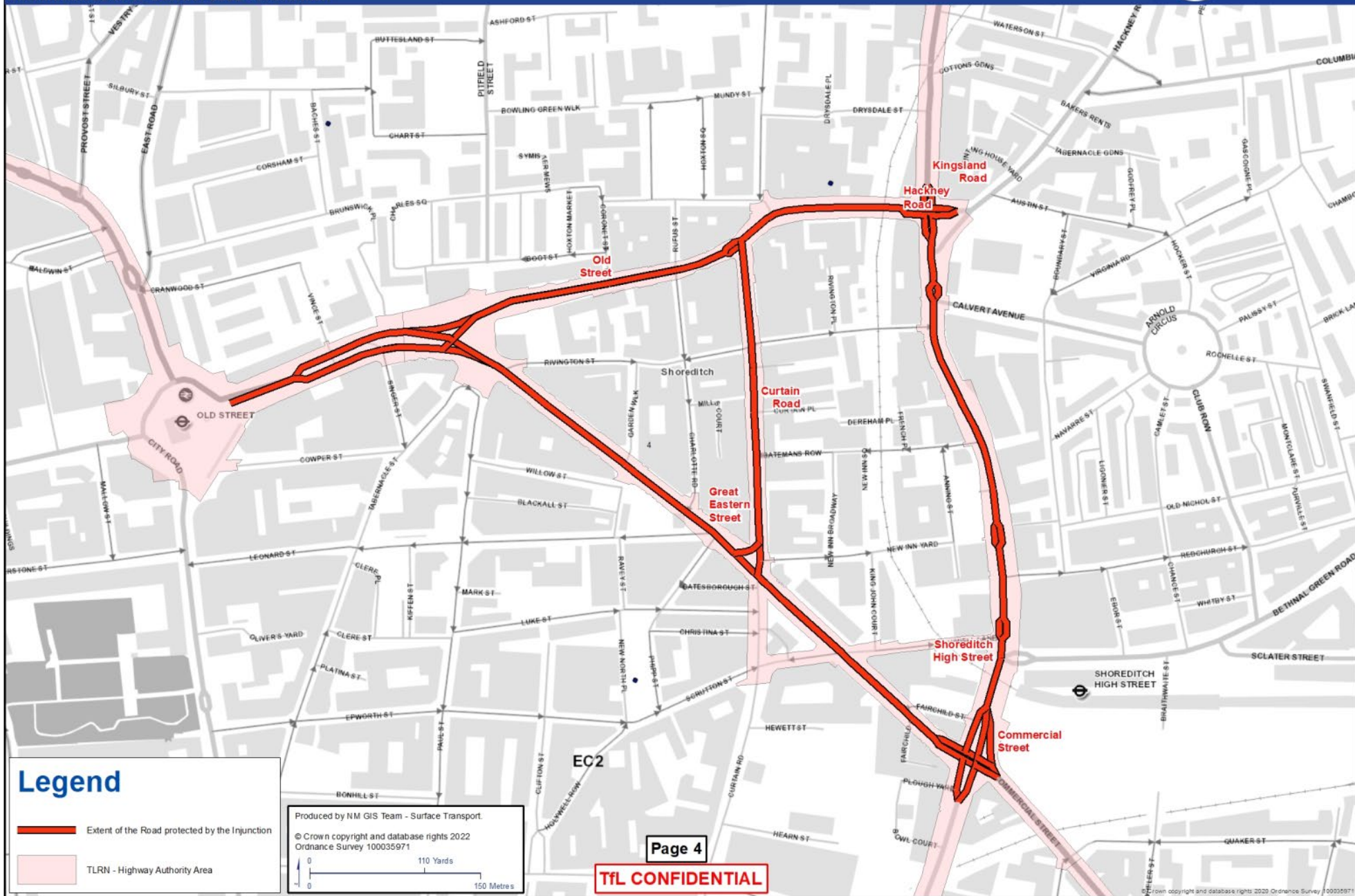
- Extent of the Road protected by the Injunction
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Produced by NM GIS Team - Surface Transport.
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0 90 Yards
0 110 Metres

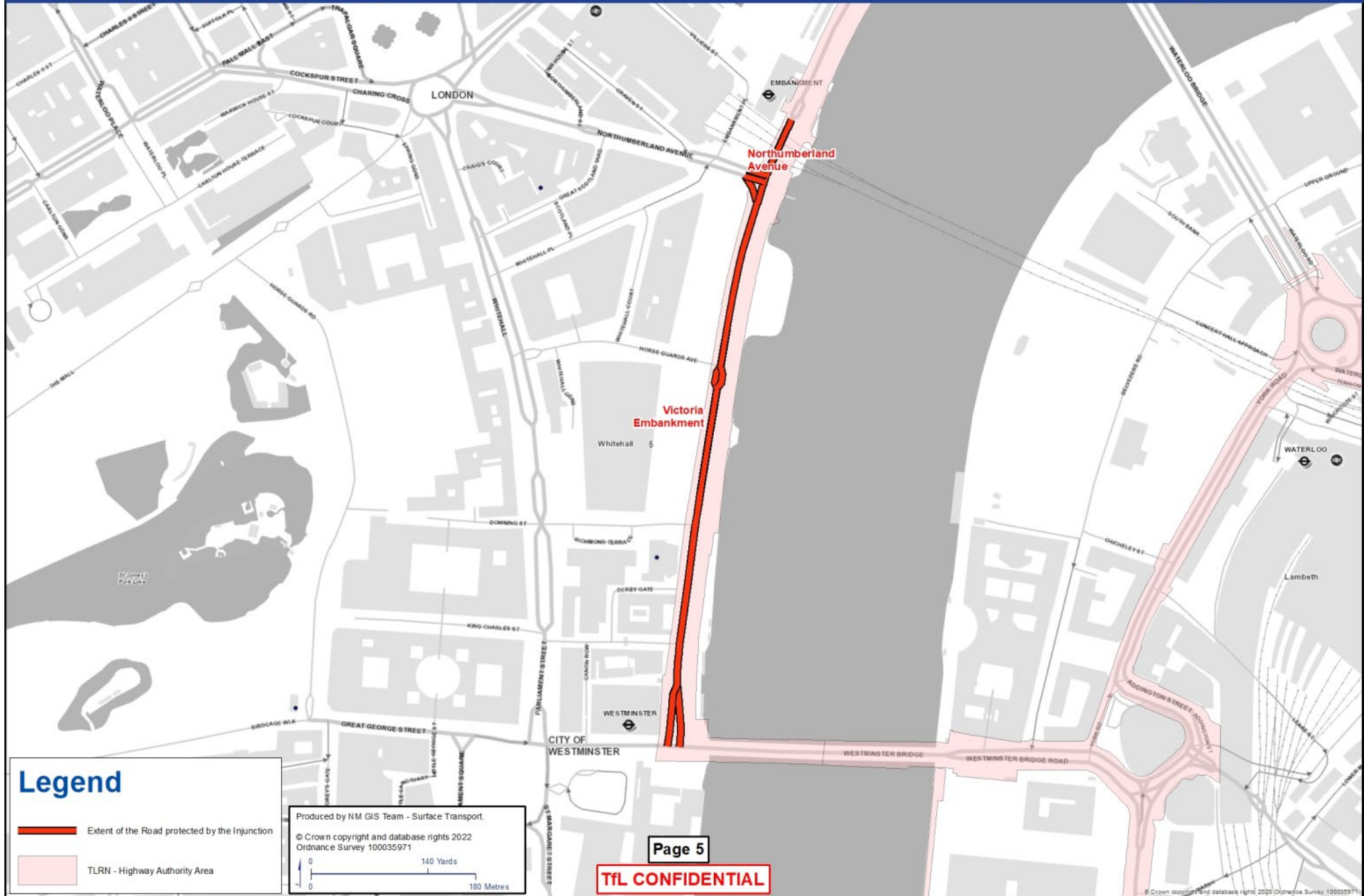
Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - Shoreditch



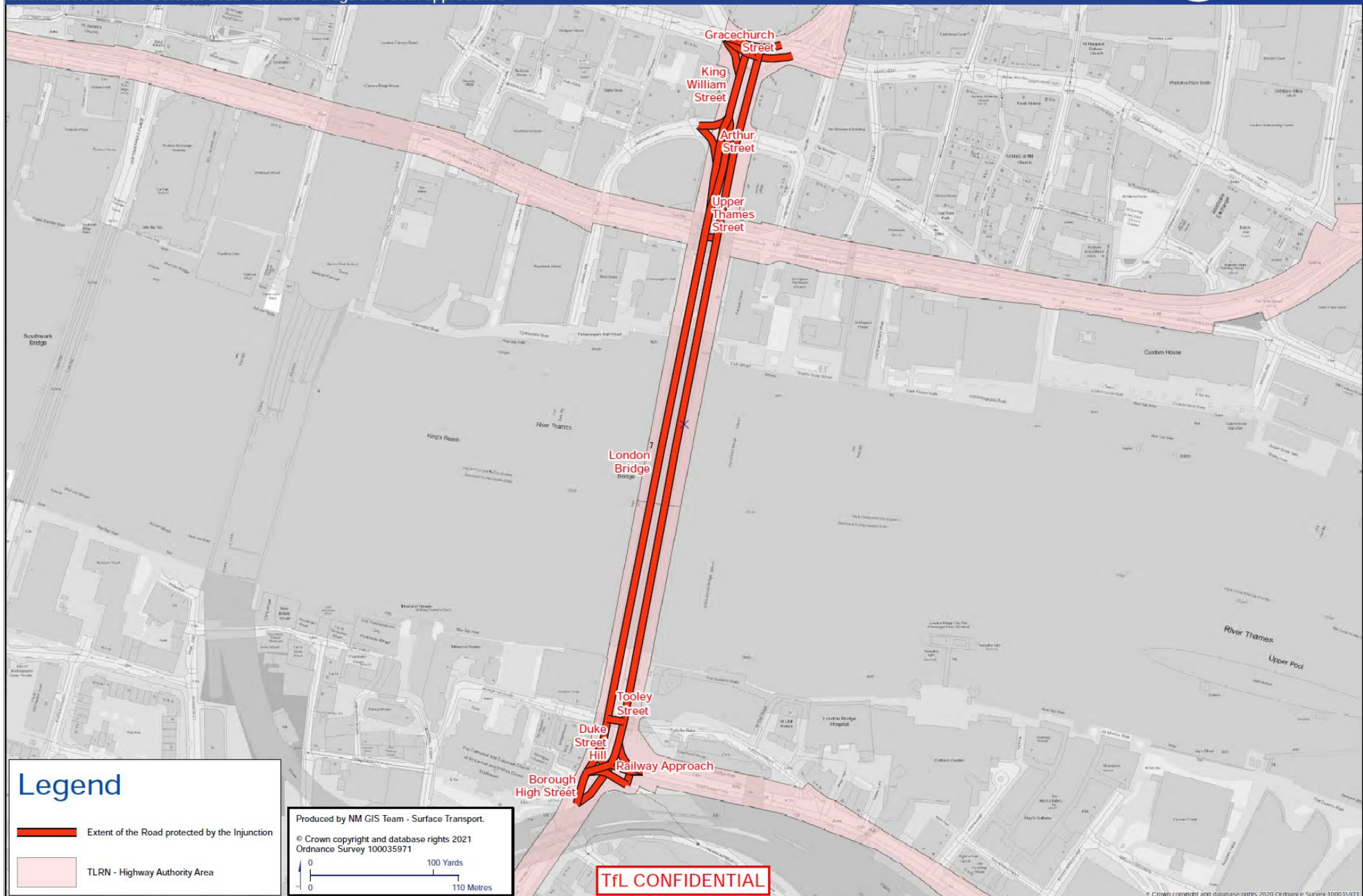
Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - Victoria Embankment



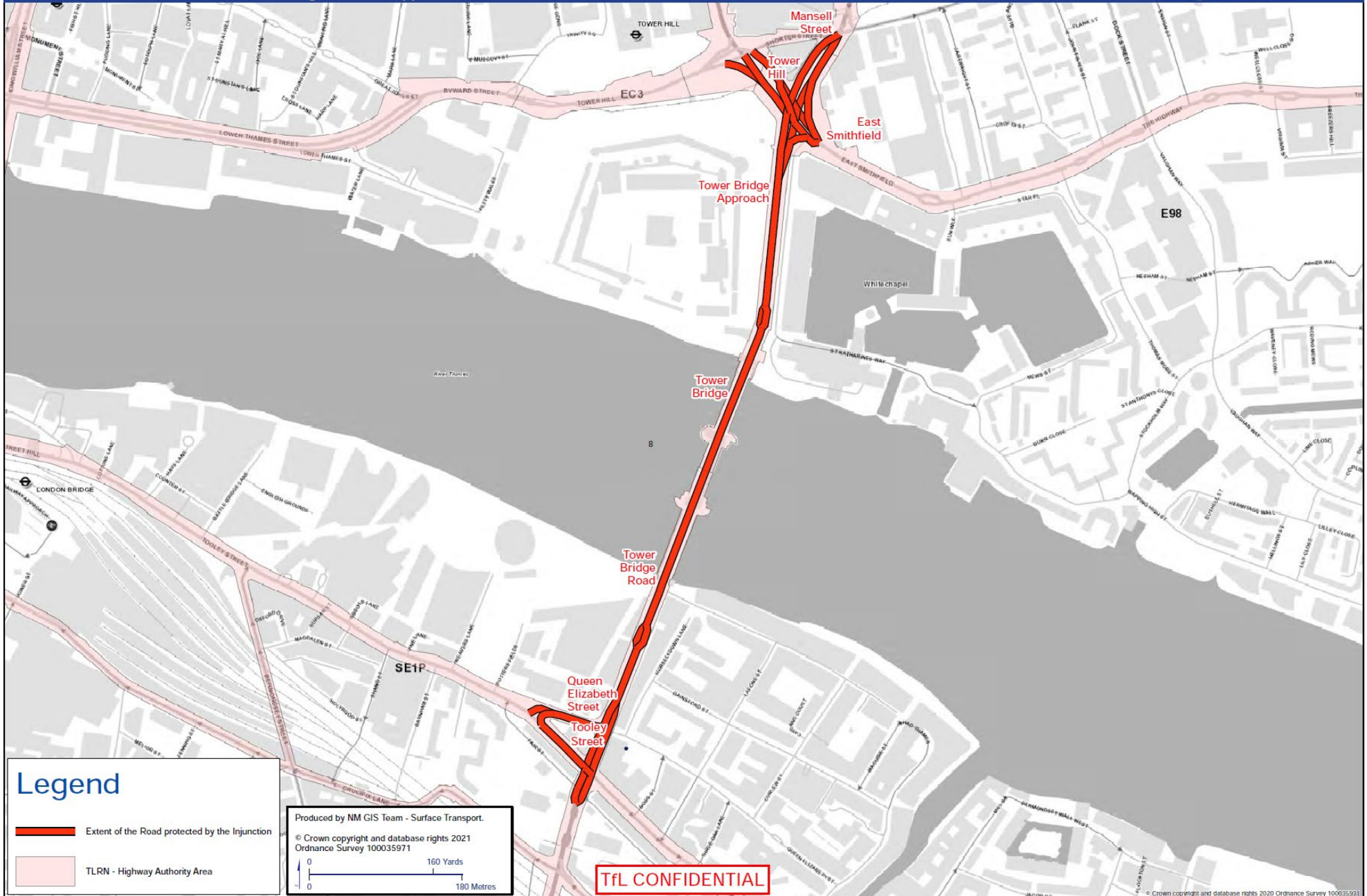
Climate Protest Injunction - Key Areas

Information as of 16 October 2022 - London Bridge and both approaches



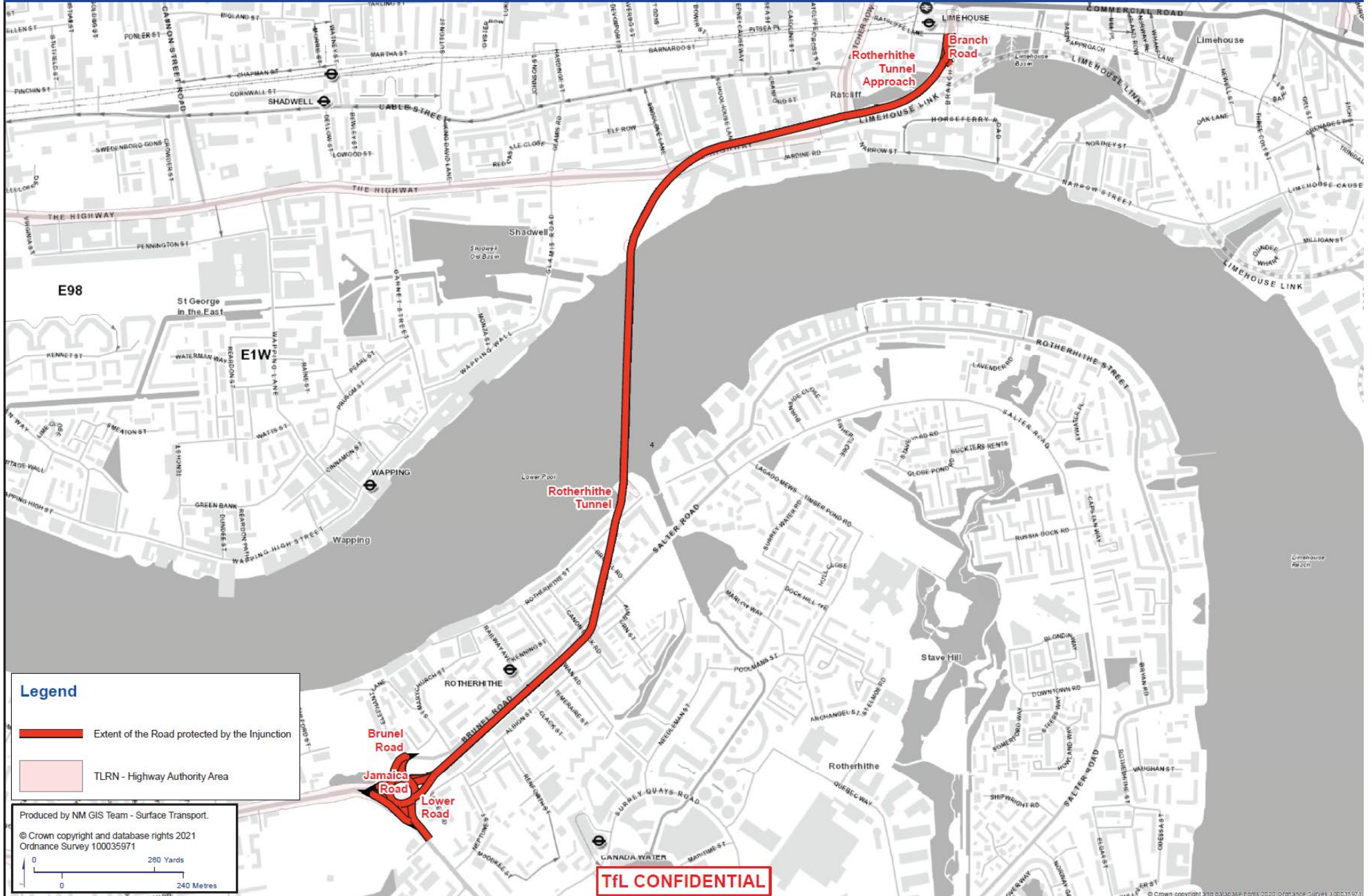
Climate Protest Injunction - Key Areas

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



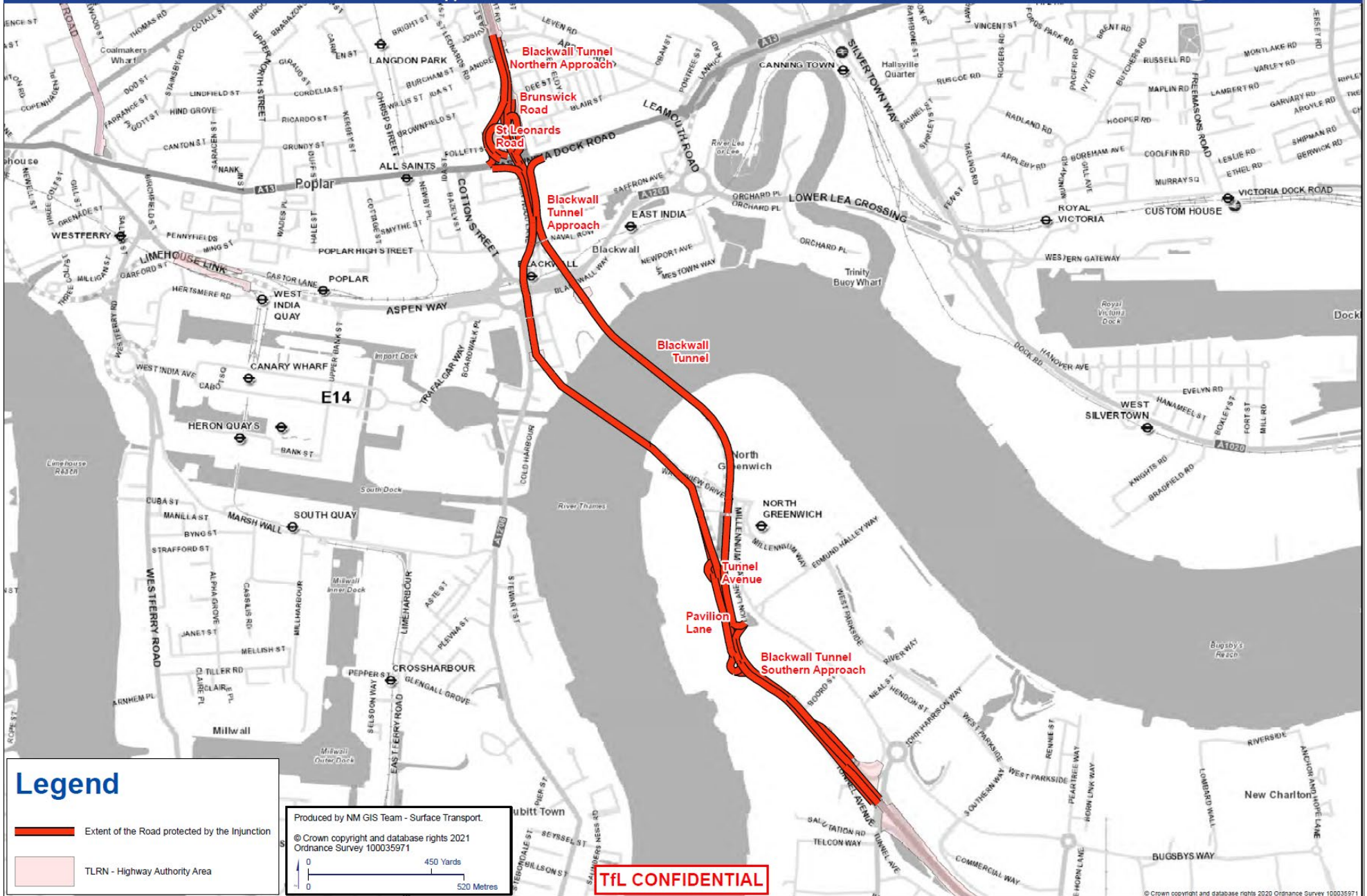
Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - Rotherhithe Tunnel and both approaches



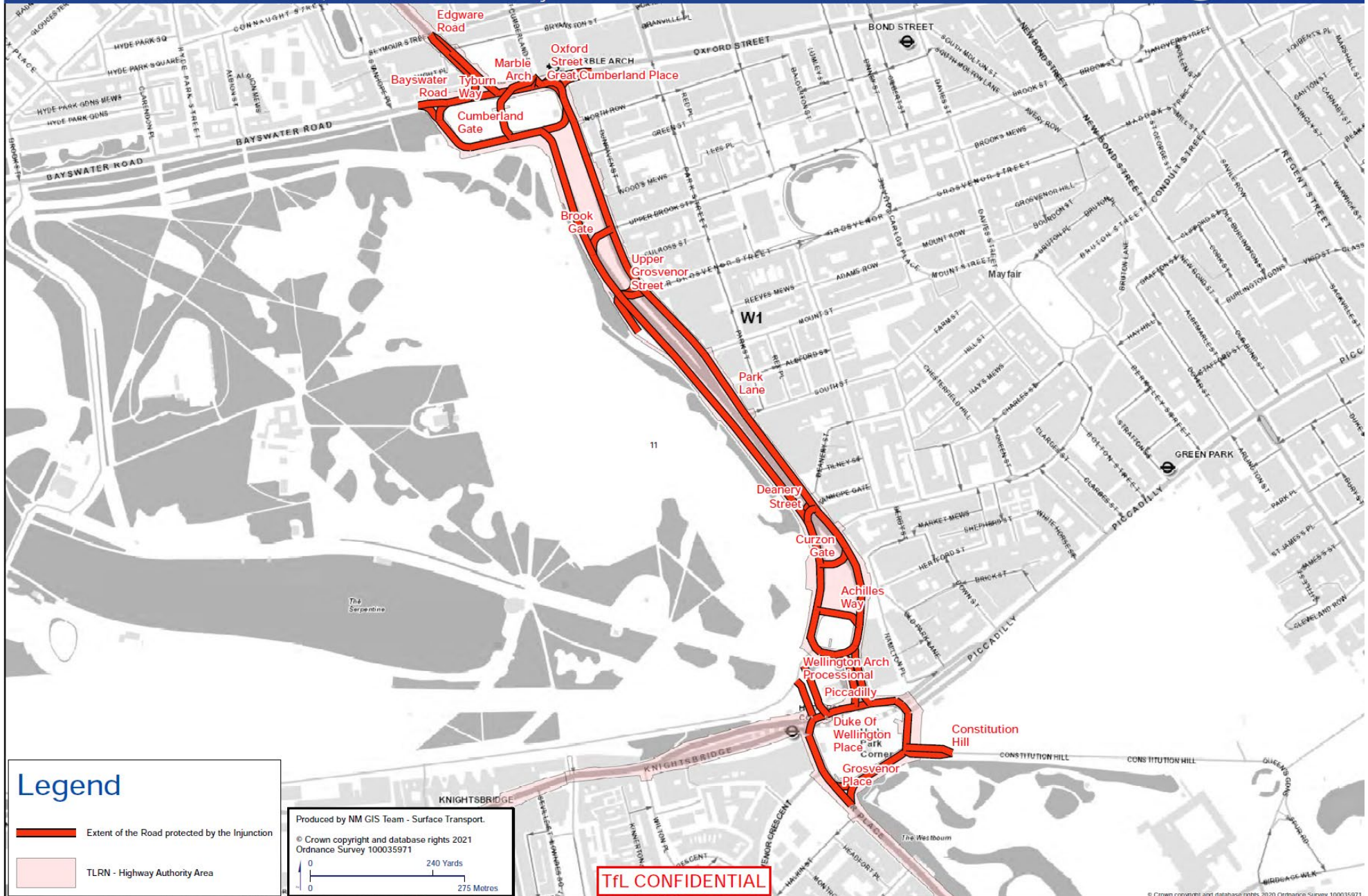
Climate Protest Injunction - Key Areas

Information as of 16 October 2022 - Blackwall Tunnel and both approaches



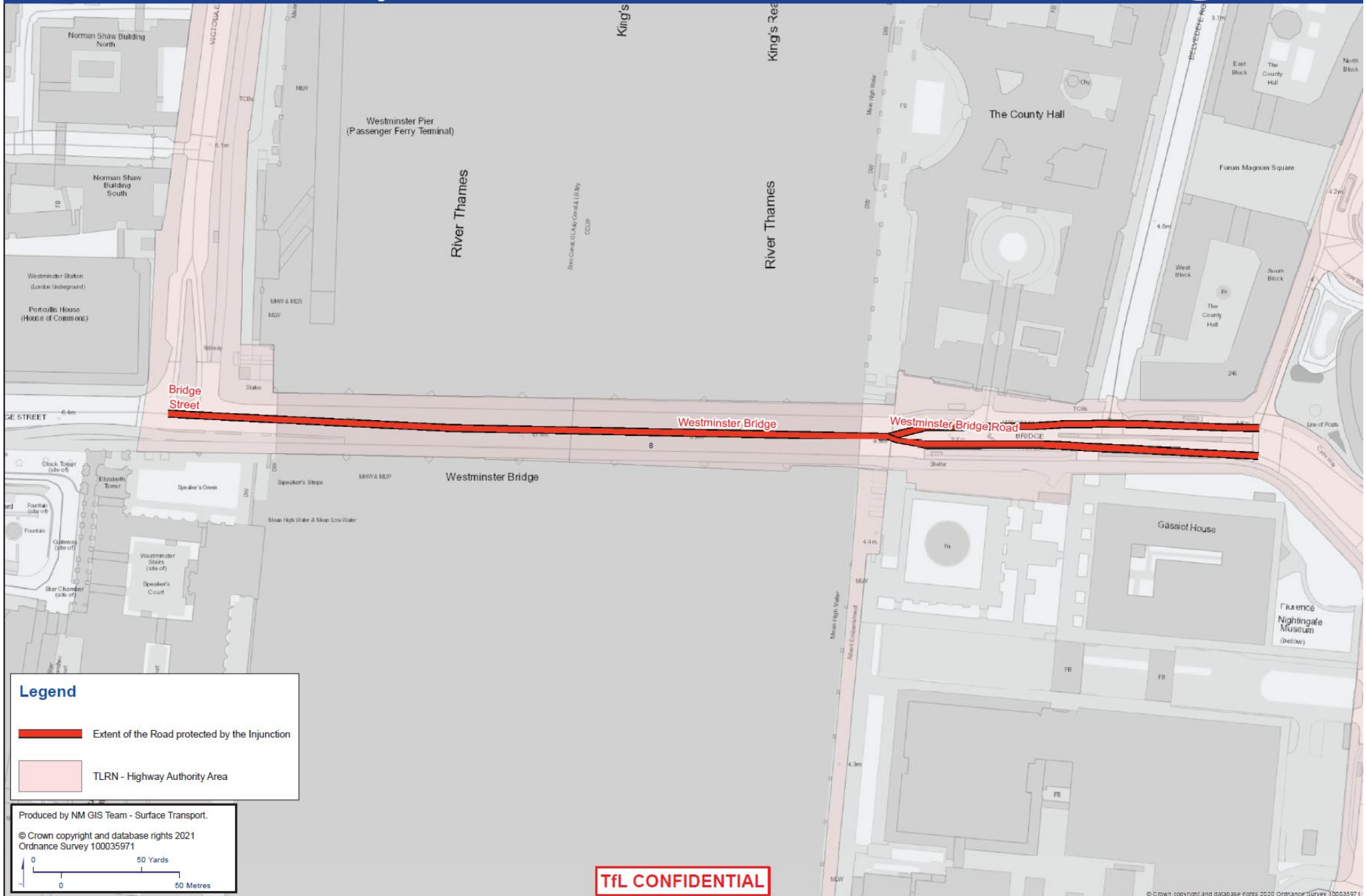
Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - Park Lane, inclusive of Marble Arch and Hyde Park Corner



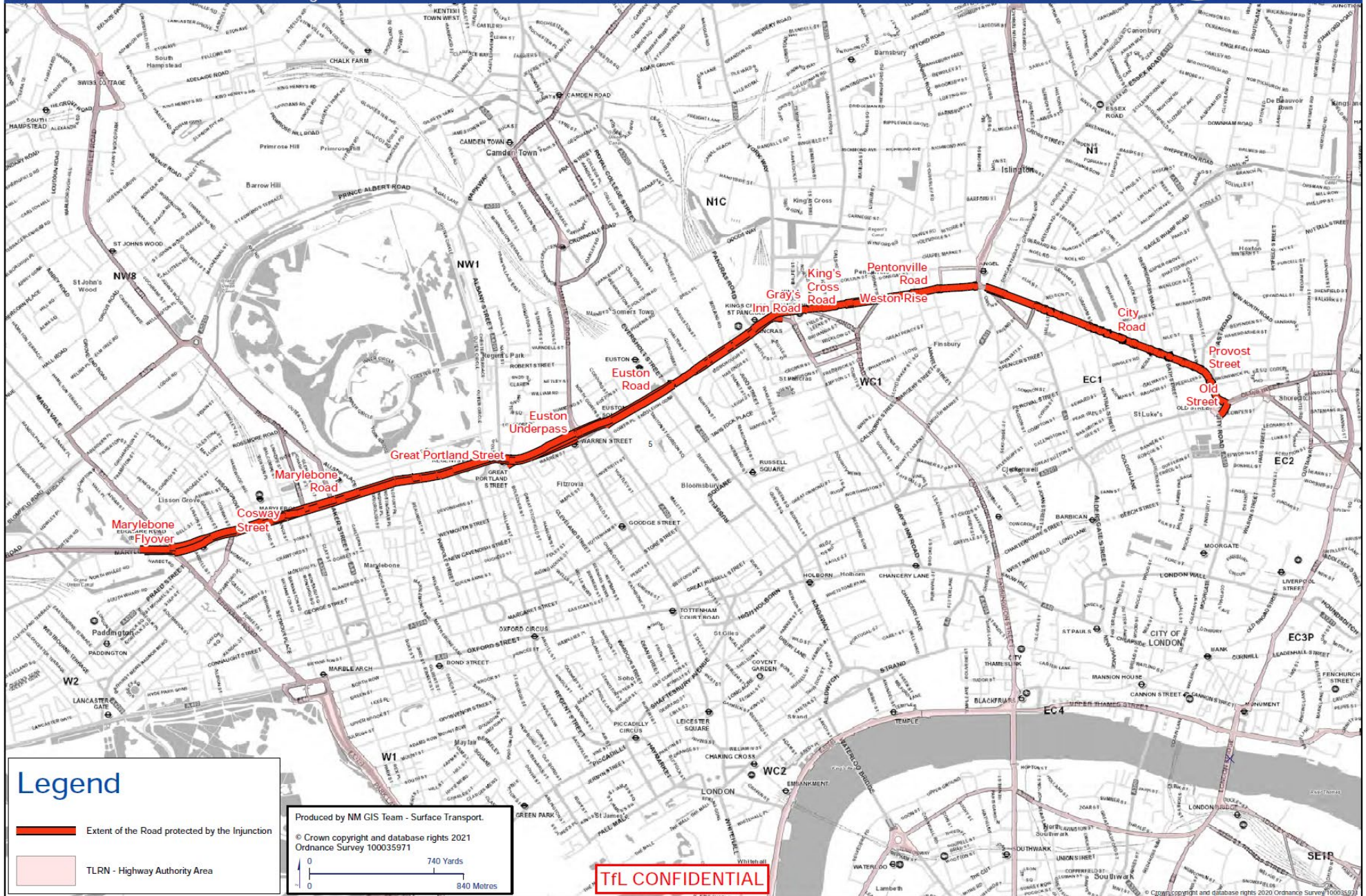
Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - Westminster Bridge



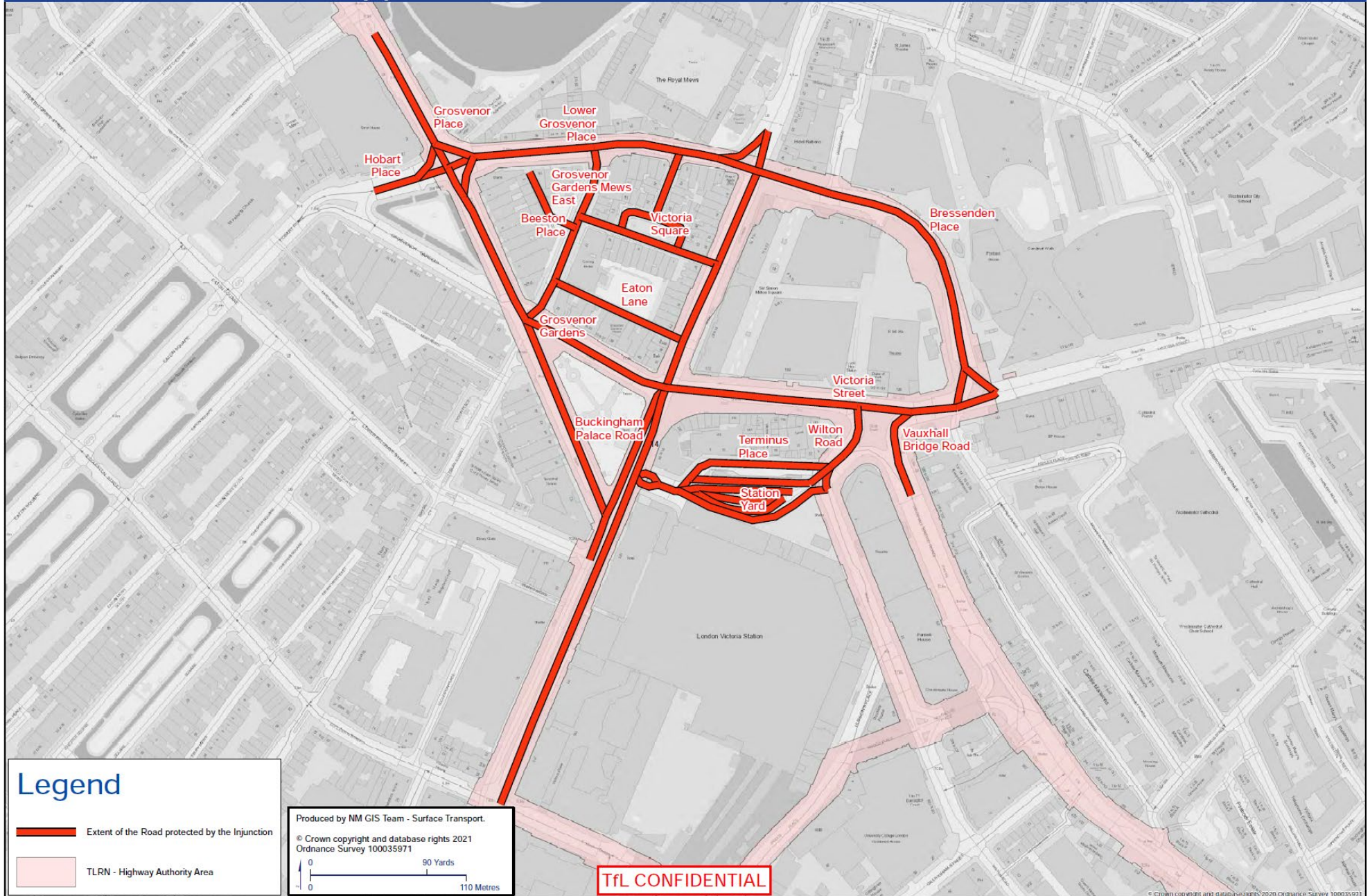
Climate Protest Injunction - Key Areas

Information as of 16 October 2022 - A501 Edgware Road to Old Street



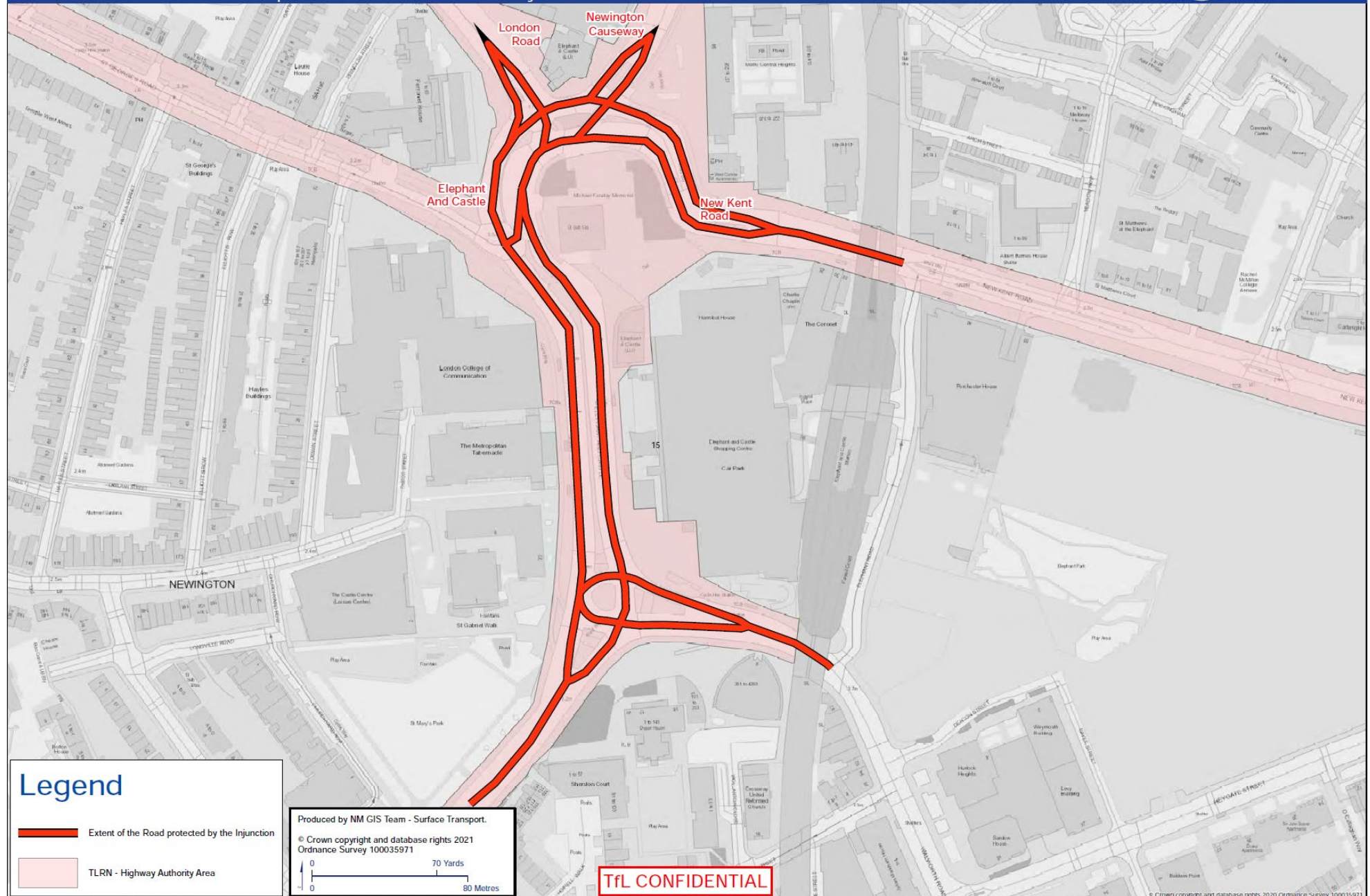
Climate Protest Injunction - Key Areas

Information as of 16 October 2022 - Victoria One Way system



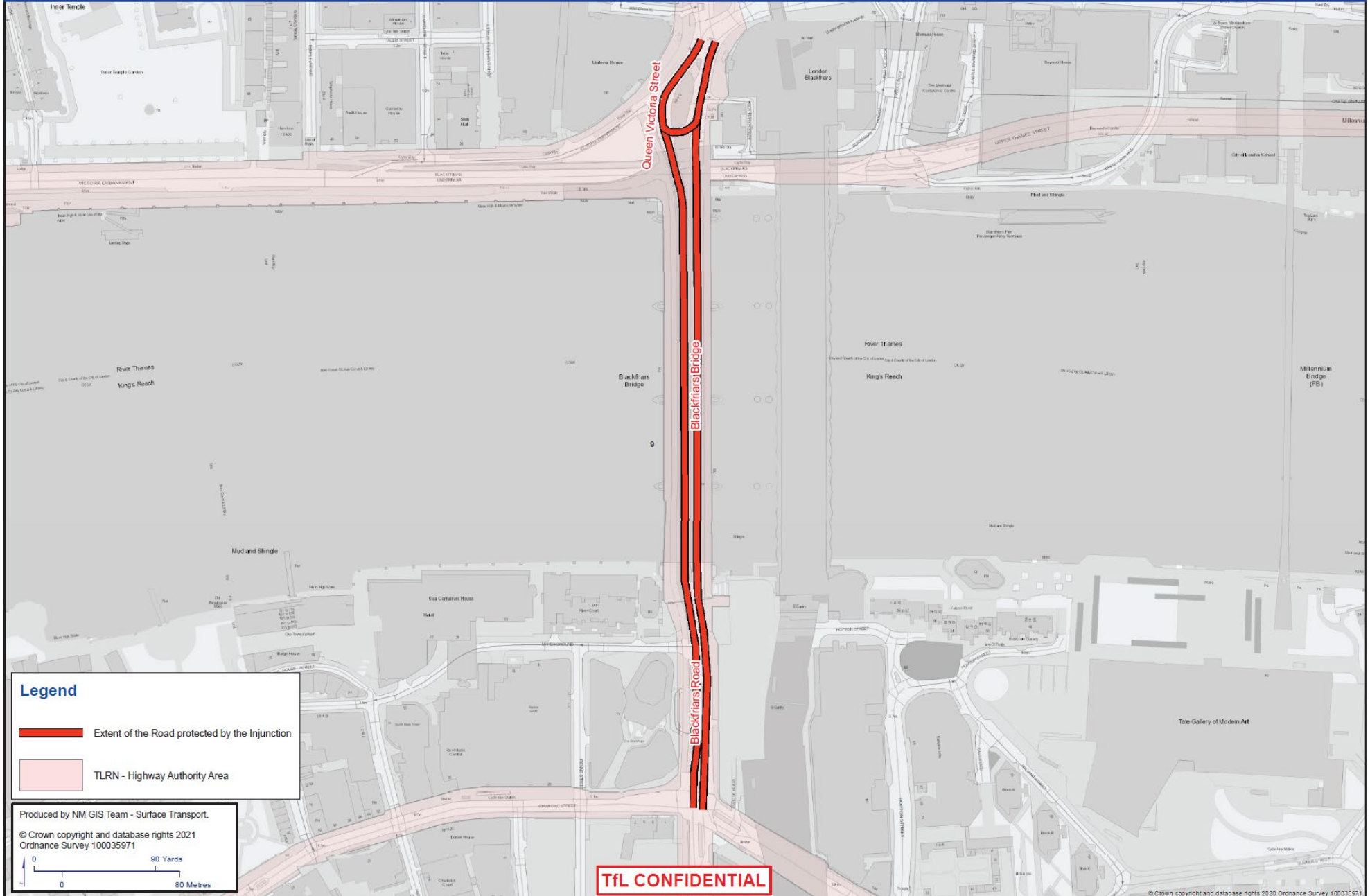
Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - Elephant and Castle Inclusive of all entry and exit roads.



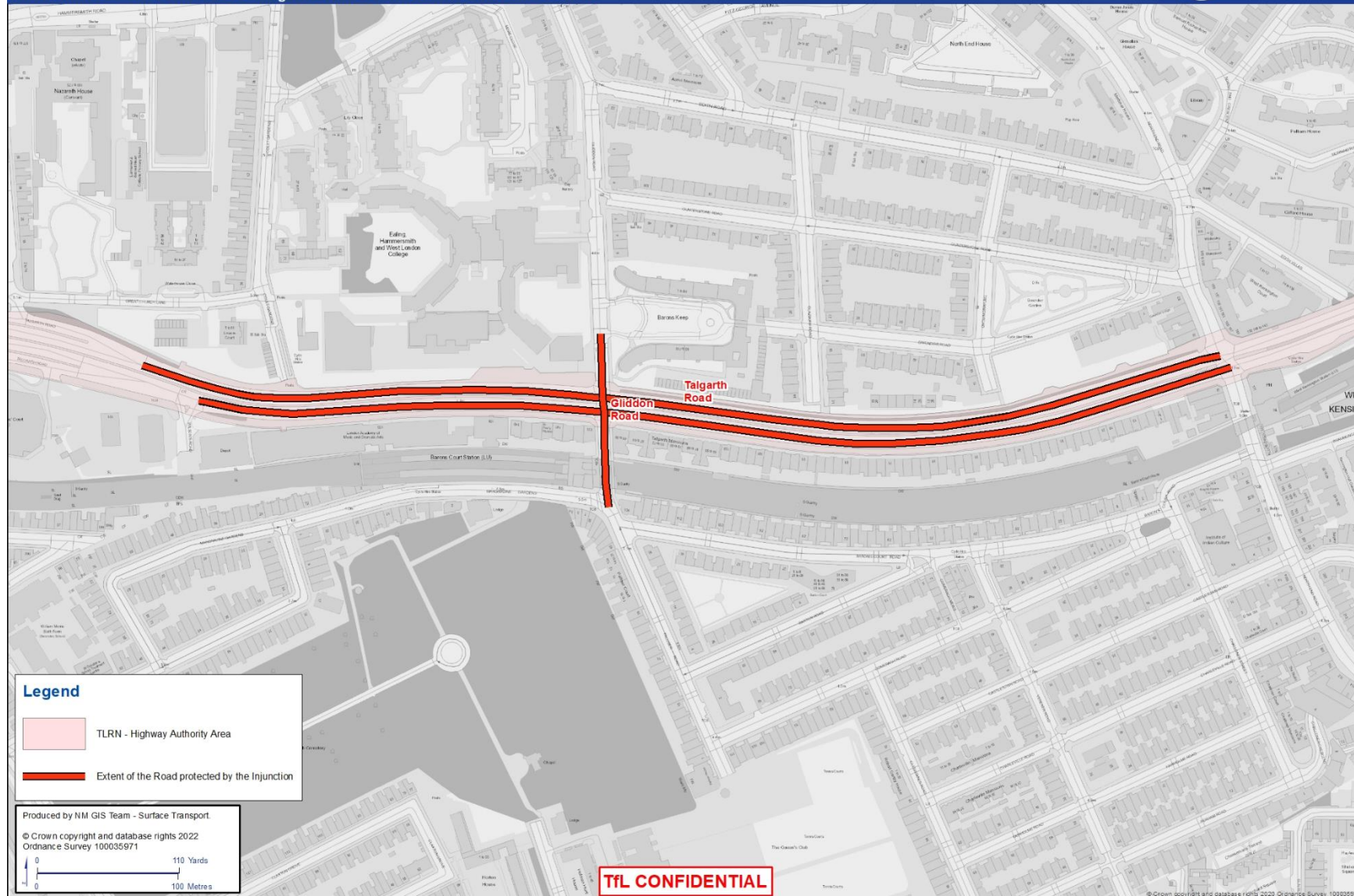
Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - Blackfriars Bridge



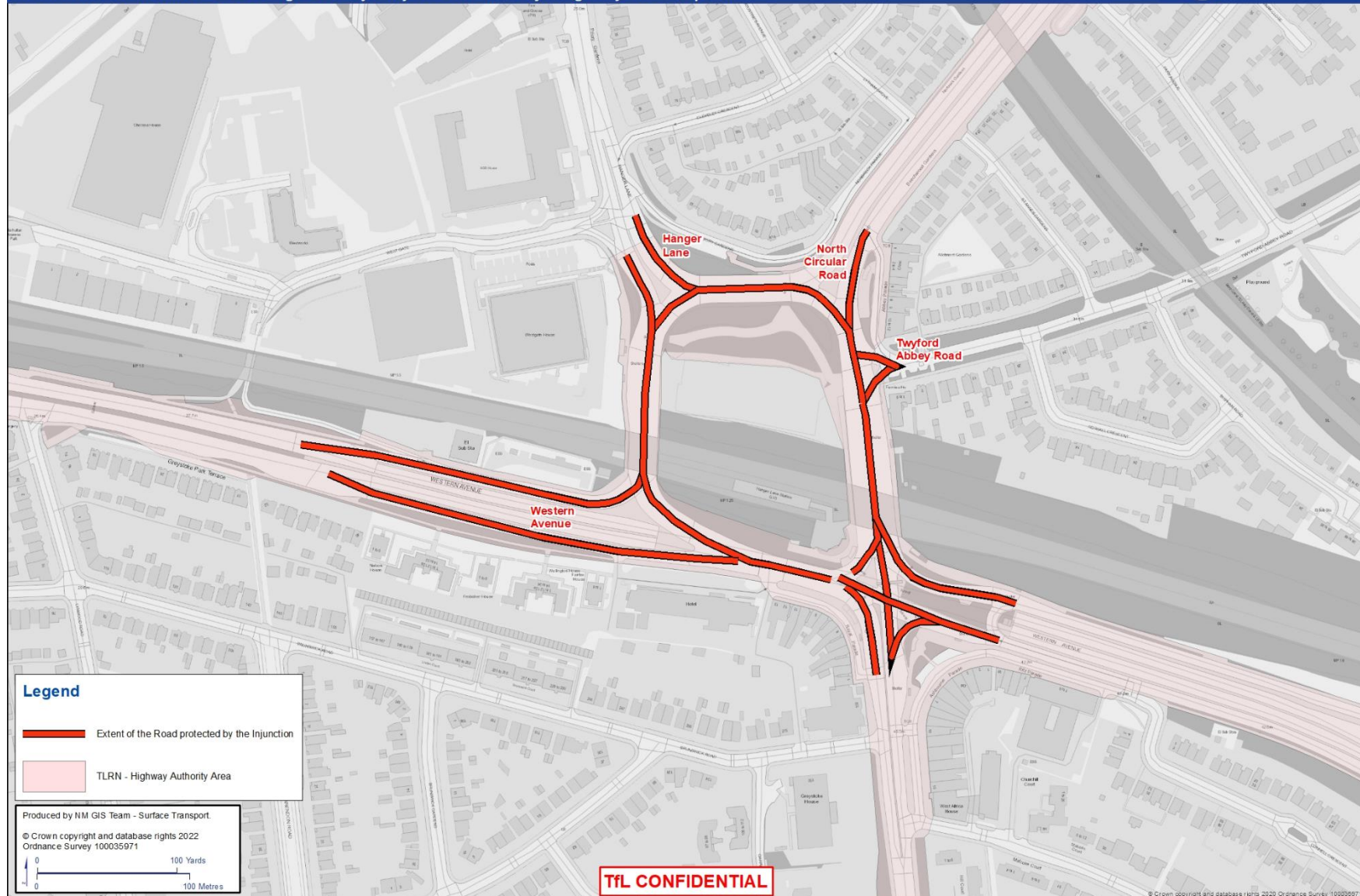
Climate Protest Injunction - Key Areas

Information as of 18 October 2022 - Talgarth Road around Barons Court tube station



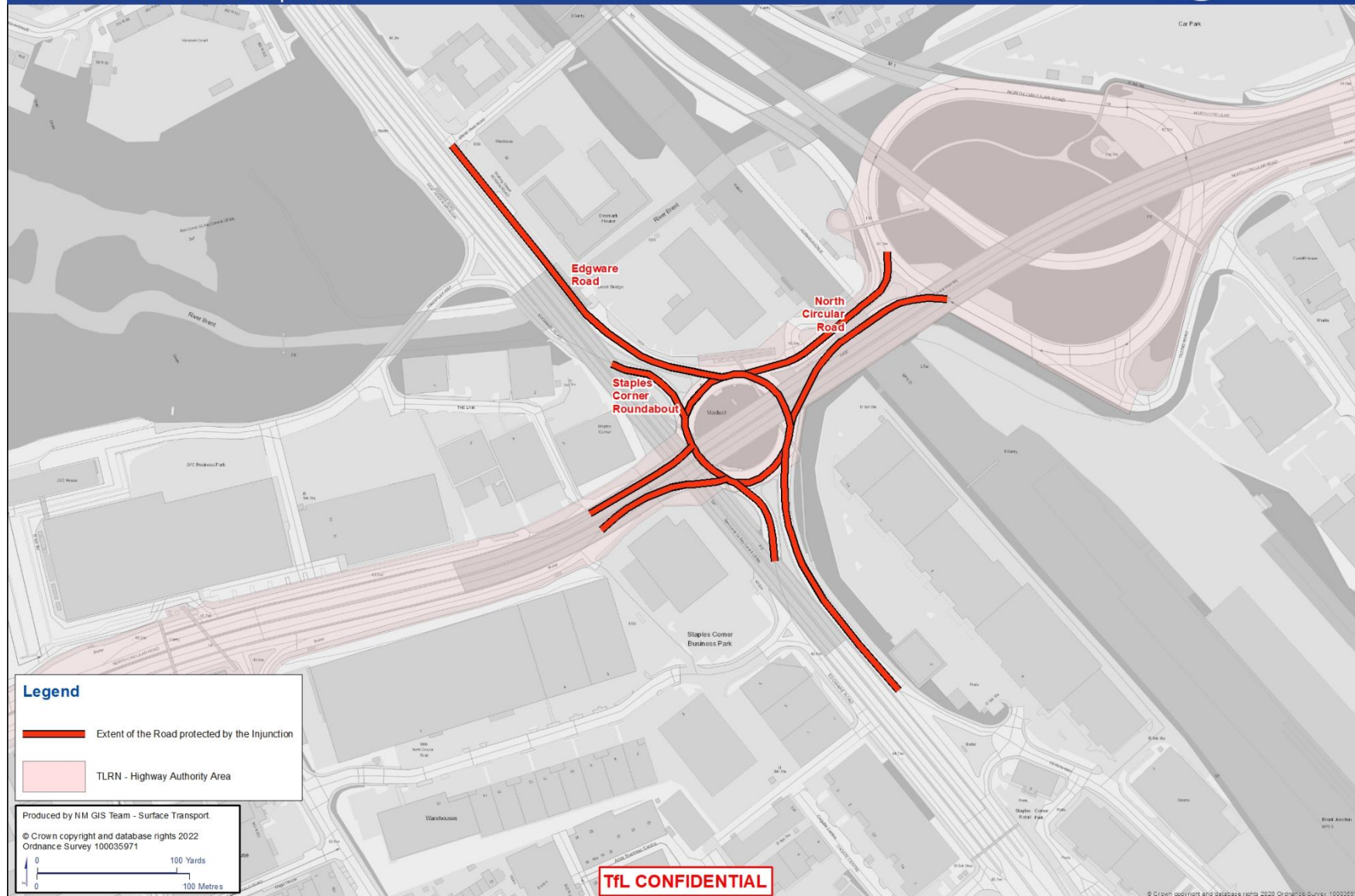
Climate Protest Injunction - Key Areas

Information as of 18 October 2022 - Hanger Lane Gytrary Inclusive of all adjoining entry and exits points



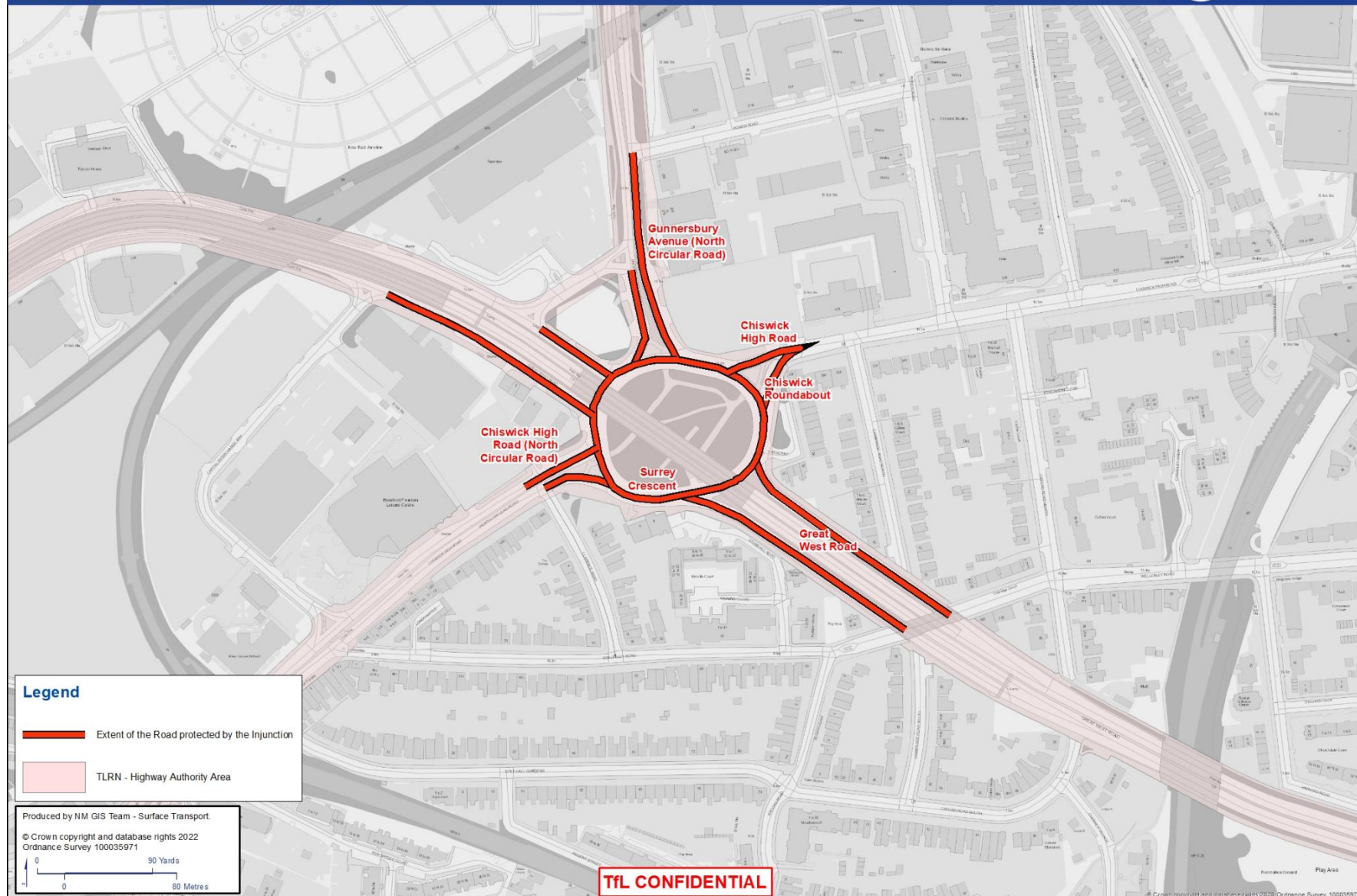
Climate Protest Injunction - Key Areas

Information as of 18 October 2022 - Staples Corner



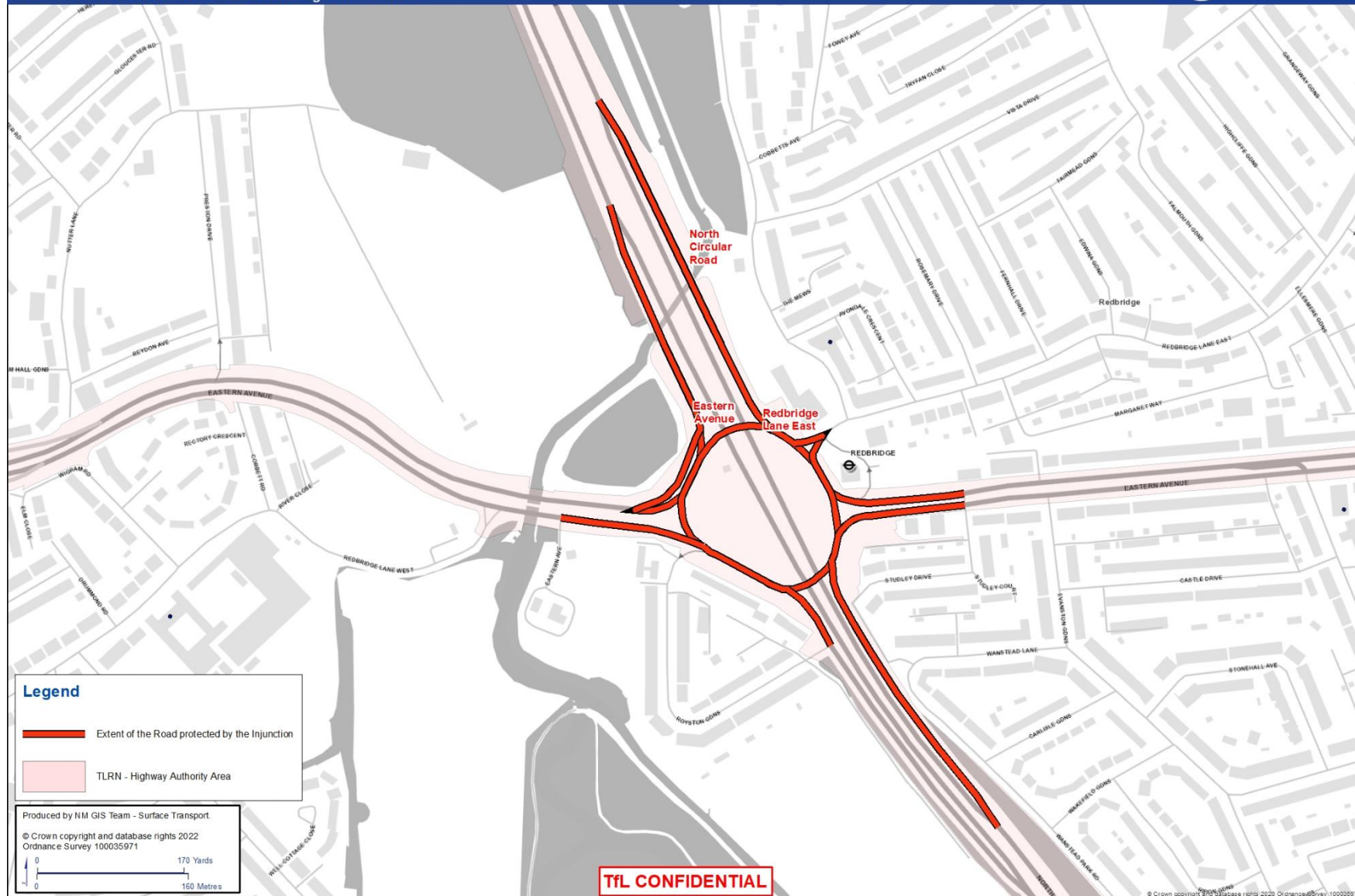
Climate Protest Injunction - Key Areas

Information as of 18 October 2022 - Chiswick Roundabout



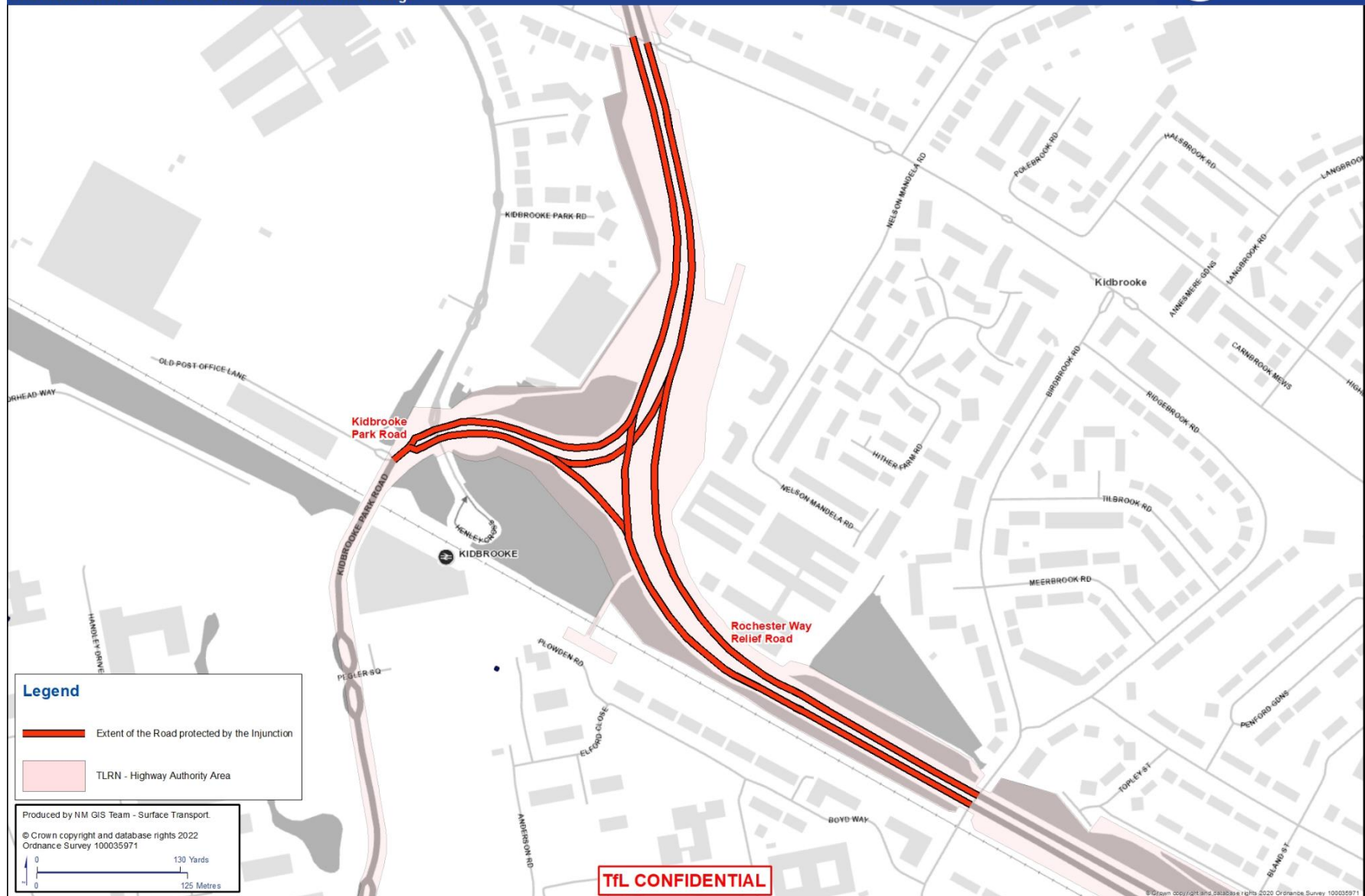
Climate Protest Injunction - Key Areas

Information as of 18 October 2022 - Redbridge Roundabout



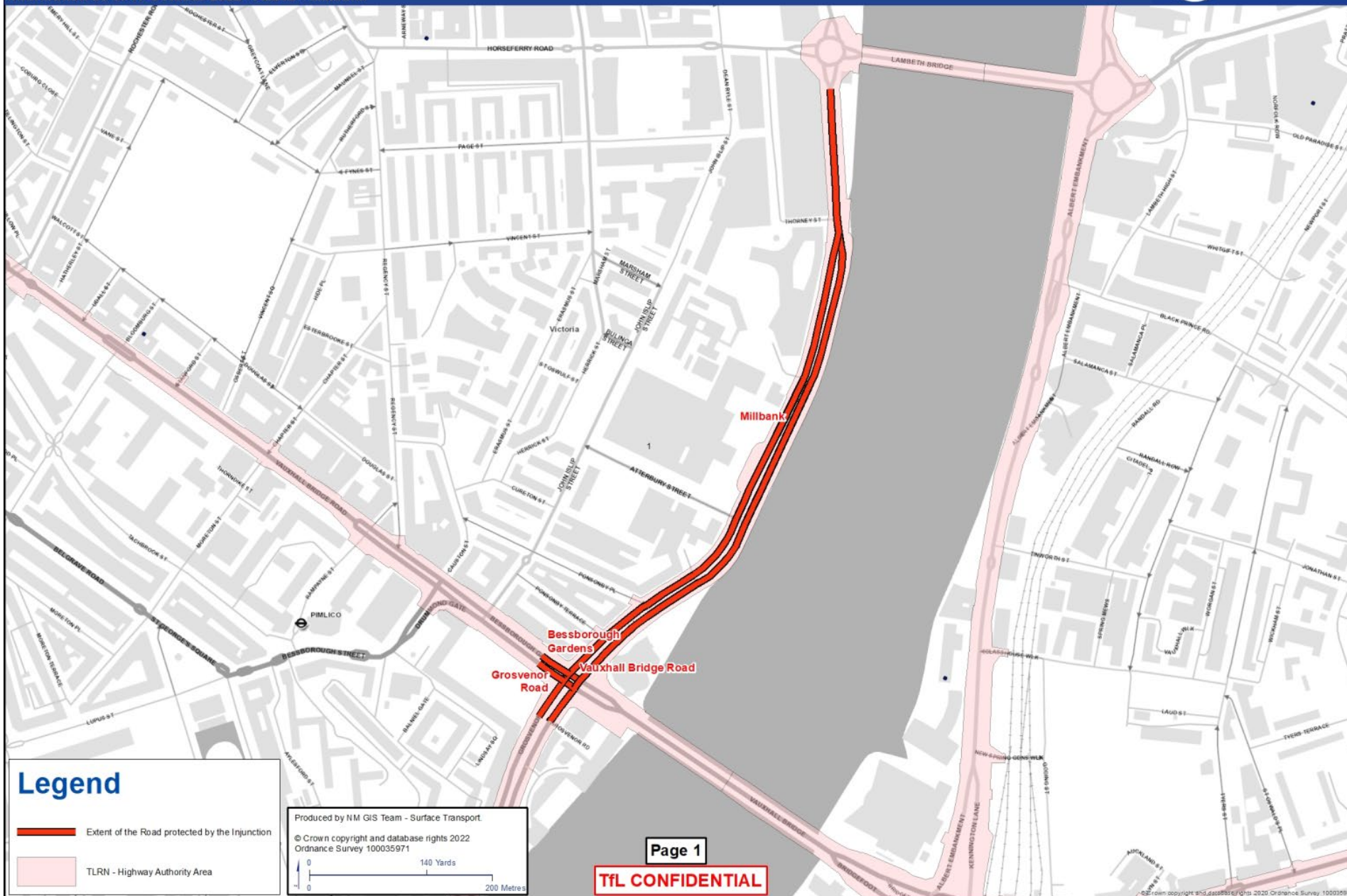
Climate Protest Injunction - Key Areas

Information as of 18 October 2022 - Kidbrooke Interchange



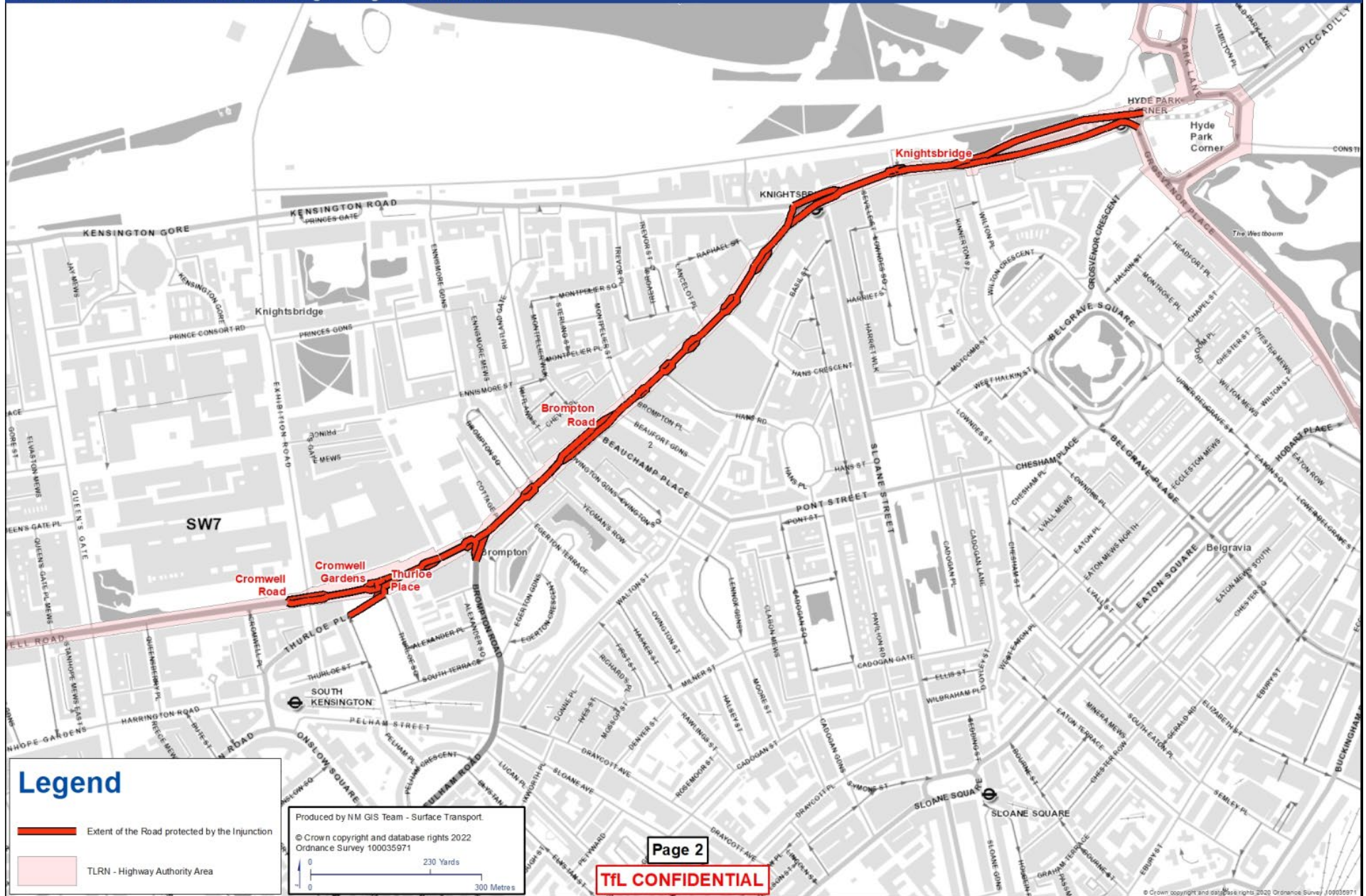
Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - A2212 - Millbank



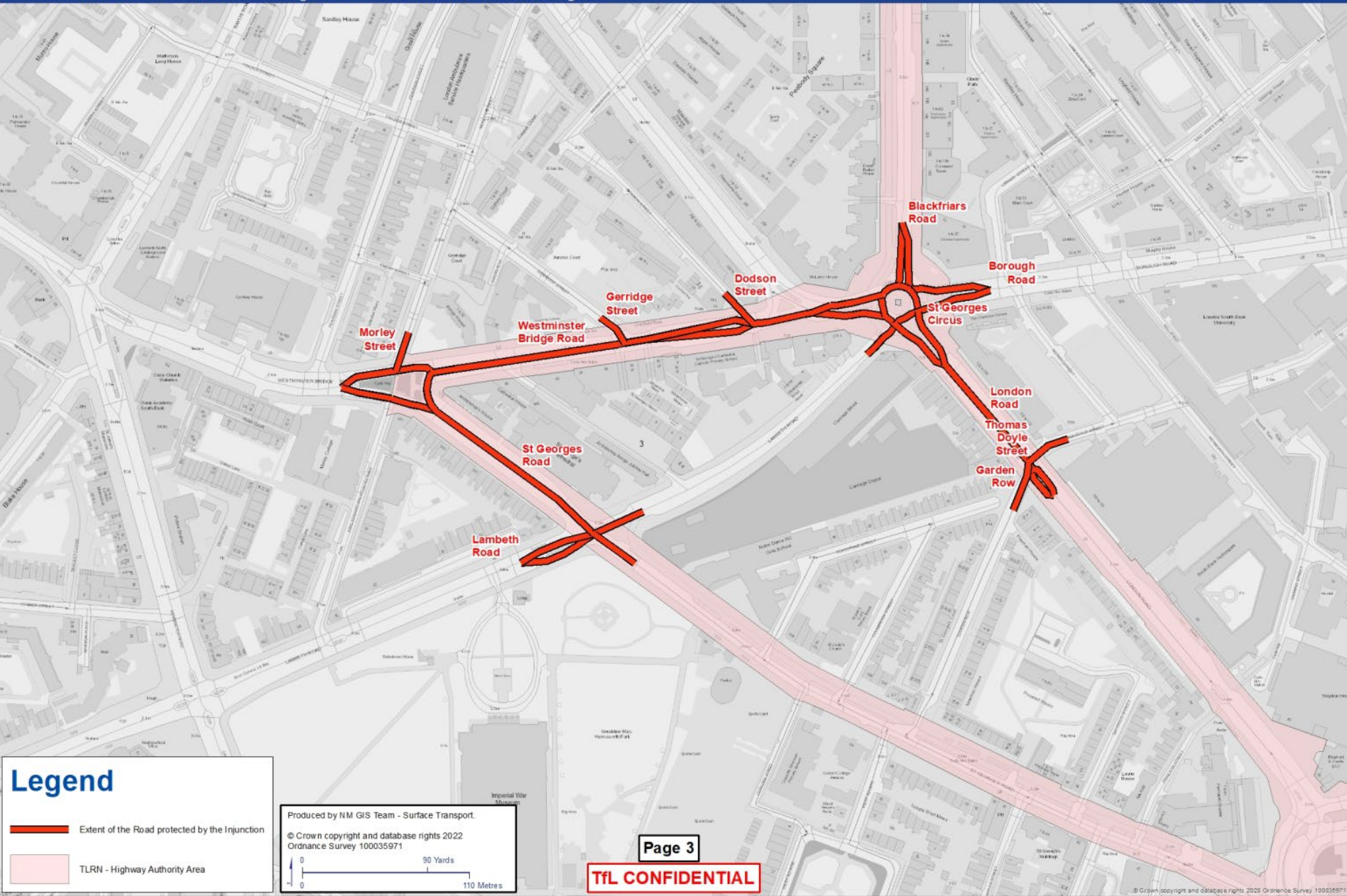
Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - A4 – Knightsbridge and Scotch corner



Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - St Georges Circus/Road and Westminster Bridge Rd



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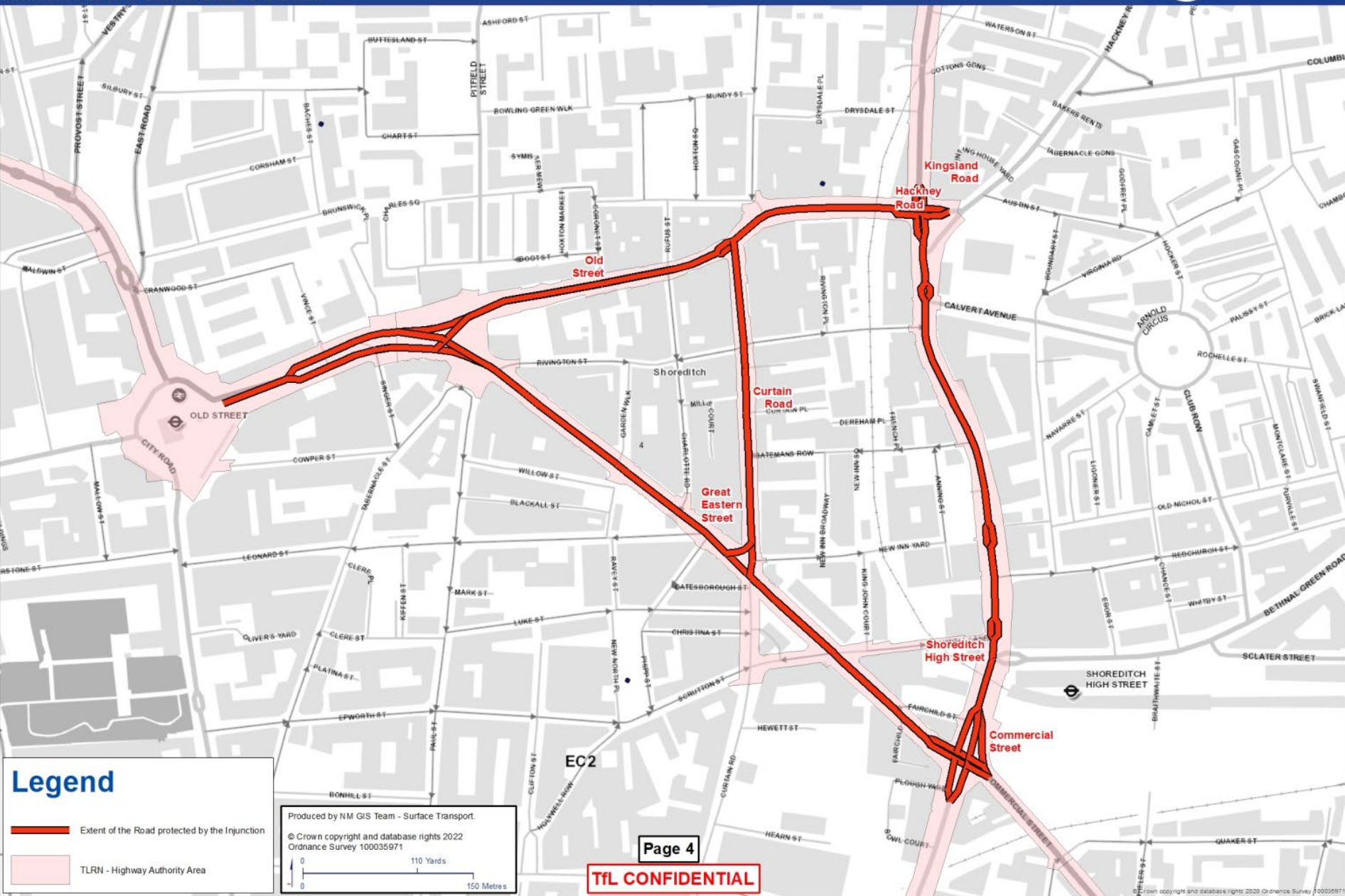
0 90 Yards
0 110 Metres

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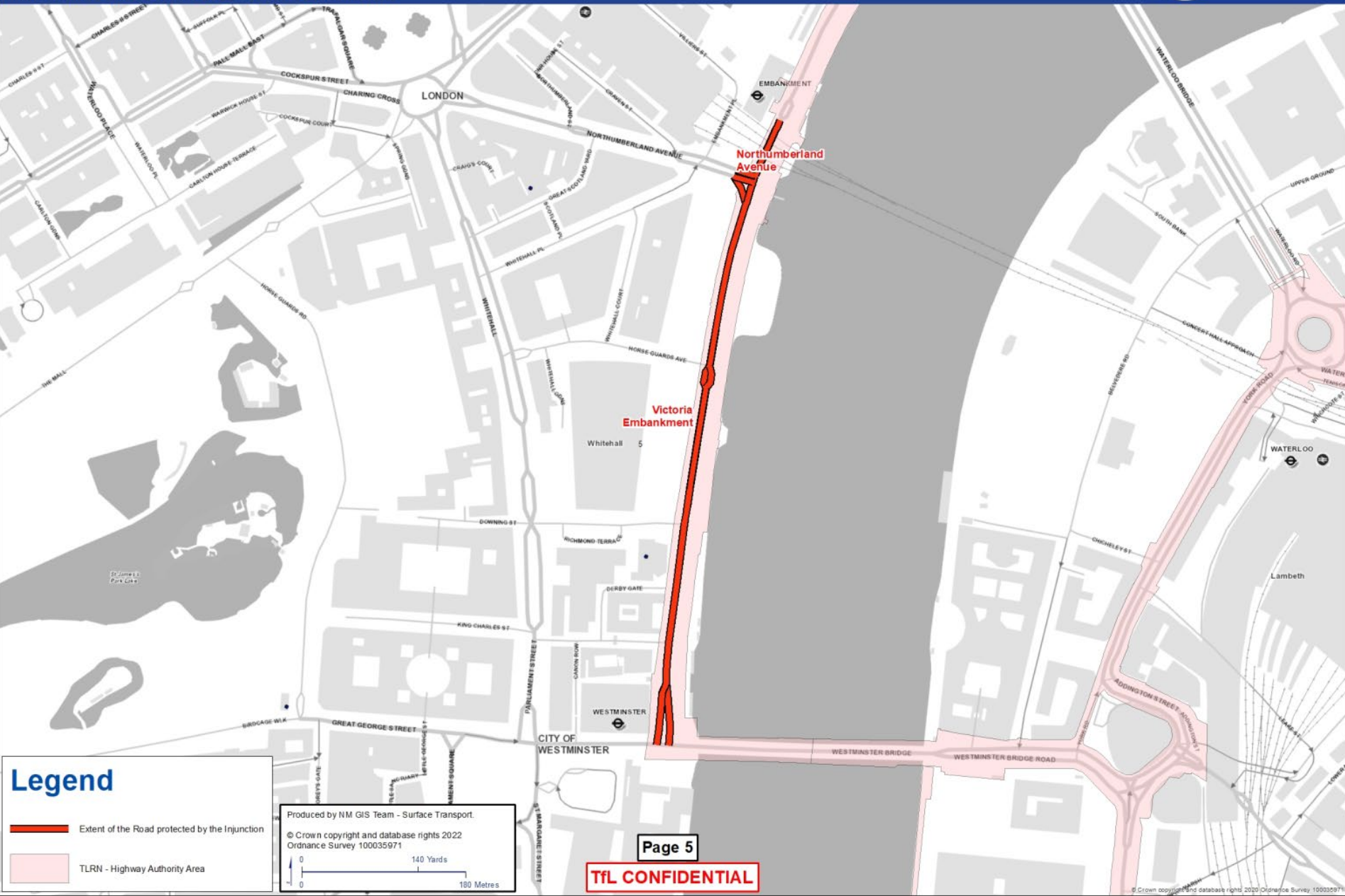
Information as of 17 October 2022 - Shoreditch



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Climate Protest Injunction - Key Areas

Information as of 17 October 2022 - Victoria Embankment



Climate Protest Injunction - Key Areas

Information as of 18 October 2022 - Talgarth Road around Barons Court tube station

