

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Before: The Honourable Mr Justice Morris
On: 4 February 2025

Claim No. QB-2021-003841

BETWEEN

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) 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

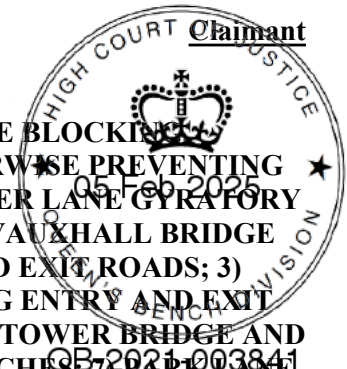
Claim No: QB-2021-004122

AND BETWEEN

TRANSPORT FOR LONDON

-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 Morris J having made a final injunction order in these claims on 3 May 2023 against persons unknown and the Named Defendants listed in the schedule in Annex 1 thereto, for a period of 5 years, subject to annual review

AND UPON such an annual review hearing before Morris J on 13 and 20 May 2024

AND UPON hearing at the review hearing the application dated 27 July 2023 by the Named Defendants listed in Annex A to the review hearing judgment of Morris J handed down on 16 January 2025 (**“the review hearing judgment”**)

AND UPON the Court having accepted written undertakings from the Named Defendants listed in Annex A to the review hearing judgment, promising not to do the prohibited conduct on roads/locations specified therein

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, 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 replaces the final injunction order made by Morris J on 3 May 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. Insulate Britain’s email addresses ring2021@protonmail.com and insulatebritainlegal@protonmail.com;
 - 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: 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 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, for so long as this Final Injunction Order is in force, a hearing to review it. Such review hearing shall take place each year on or around 3 May. 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: 4 February 2025