

**IN THE HIGH COURT OF JUSTICE**  
**KING'S BENCH DIVISION**

**Claim Nos. QB-2021-003841, QB-2021-004122, KB-2022-003542**

**BETWEEN**

**TRANSPORT FOR LONDON**

**Claimant**

**-and-**

**[INSULATE BRITAIN AND JUST STOP OIL PROTESTERS, BOTH NAMED AND  
PERSONS UNKNOWN]**

**Defendants**

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**BUNDLE FOR THIRD REVIEW HEARING  
ON 24 NOVEMBER 2025**

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Party: **Claimant**  
Name: **Carl Eddleston**  
No: **4**  
Date: **6 November 2025**

**IN THE HIGH COURT OF JUSTICE**  
**KING'S BENCH DIVISION**

Claim Nos. QB-2021-003841, QB-2021-004122, KB-2022-003542  
**BETWEEN**  
**TRANSPORT FOR LONDON**

**Claimant**

**-and-**

**[INSULATE BRITAIN AND JUST STOP OIL PROTESTERS, BOTH NAMED AND  
PERSONS UNKNOWN]**

**Defendants**

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**Witness Statement of CARL EDDLESTON**

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I, **CARL EDDLESTON**, of Transport for London ("**TfL**" / "**the Claimant**") will say as follows:

1. I am the Director Network Management and Resilience at TfL. I joined TfL in 2006 and have held a variety of positions having varied responsibility from road network design to Chief Engineer for Road Network Performance. I am duly authorised by TfL to make this statement.
2. This is my fourth witness statement. Its purpose is to set out the service and notification which has been undertaken by TfL following the second review hearing and for the purposes of this third review hearing.
3. I am informed by TfL's lawyers that TfL served/notified the following people/organisations with the following material:
  - a. on 28 May 2025 all Named Defendants in the TfL Claims were served via email or post with: i) the Order made at the second review hearing by Morris J dated 12 May 2025 ("**Second Review Hearing Order**"), and ii) the Judgment Order dated 3 May 2023, as amended on 12 May 2025 under the slip rule;

- b. on 27 May 2025, TfL complied with the publicisation/notification requirements contained in paragraph 8 of the Second Review Hearing Order and paragraph 7 of the Judgment Order dated 3 May 2023, as amended on 12 May 2025 under the slip rule;
- c. on 2 October 2025 all Named Defendants in the TfL Claims were served via email or post with notification of the date and location of this third review hearing. Notification was also sent to those organisations listed in paragraph 8b of the Second Review Hearing Order;
- d. on 21 October 2025, TfL notified Morris J, via a letter and draft Orders all attached to an email, that it does not seek to maintain the Final Injunctions. Giovanna Lewis (Named Defendant 128 in the TfL IB Claims), who has acted as a representative for Named Defendants in those Claims, was copied into that email;
- e. TfL will via email or post notify all Named Defendants in the TfL Claims that it would not be seeking to maintain the Final Injunctions and that the third review hearing was going ahead. Notification will also be sent to those organisations listed in paragraph 8b of the Second Review Hearing Order. This will clarify what TfL sent via email or post to Named Defendants on 17 October 2025 which was, having informed them that TfL would not be seeking to maintain the Final Injunctions, that it would ask that this third review hearing be vacated.

### **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 made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:



Name: CARL EDDLESTON

Dated: 6 November 2025

# Application notice

For help in completing this form please read the notes for guidance form N244Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

|                                           |                                                                                                                                                |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Name of court</b>                      | <b>Claim no.</b>                                                                                                                               |
| <b>Fee account no.</b><br>(if applicable) | <b>Help with Fees – Ref. no.</b><br>(if applicable)                                                                                            |
|                                           | <b>H W F</b> – <input type="text"/> <input type="text"/> <input type="text"/> – <input type="text"/> <input type="text"/> <input type="text"/> |
| <b>Warrant no.</b><br>(if applicable)     |                                                                                                                                                |
| <b>Claimant's name</b> (including ref.)   |                                                                                                                                                |
| <b>Defendant's name</b> (including ref.)  |                                                                                                                                                |
| <b>Date</b>                               |                                                                                                                                                |

1. What is your name or, if you are a legal representative, the name of your firm?

2. Are you a ☐ Claimant ☐ Defendant ☐ Legal Representative  
☐ Other (please specify)

If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?

4. Have you attached a draft of the order you are applying for? ☐ Yes ☐ No

5. How do you want to have this application dealt with? ☐ at a hearing ☐ without a hearing  
☐ at a remote hearing

6. How long do you think the hearing will last?  Hours  Minutes  
 Is this time estimate agreed by all parties? ☐ Yes ☐ No

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

9. Who should be served with this application?

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

- ☐ the attached witness statement
- ☐ the statement of case
- ☐ the evidence set out in the box below

If necessary, please continue on a separate sheet.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

☐ No

## Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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.

- ☐ **I believe** that the facts stated in section 10 (and any continuation sheets) are true.
- ☐ **The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

### Signature

- ☐ Applicant
- ☐ Litigation friend (where applicant is a child or a Protected Party)
- ☐ Applicant's legal representative (as defined by CPR 2.3(1))

### Date

Day

Month

Year

Full name

Name of applicant's legal representative's firm

If signing on behalf of firm or company give position or office held

Applicant’s address to which documents should be sent.

Building and street

Second line of address

Town or city

County (optional)

Postcode

|  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|
|  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|

If applicable

Phone number

Fax phone number

DX number

Your Ref.

Email

**IN THE HIGH COURT OF JUSTICE**  
**KING'S BENCH DIVISION**

Claim No. QB-2021-003841

BETWEEN

TRANSPORT FOR LONDON

**Claimant**

-and-

(1) PERSONS UNKNOWN DELIBERATELY CAUSING THE BLOCKING OF, 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

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

Claim No. KB-2022-003542

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) 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, A5201 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**

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**ORDER**

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**WHEREAS** a final injunction was made in the above Claims on 3 May 2023 for 5 years against the Defendants, subject to annual review hearings.

**AND WHEREAS** certain Named Defendants were removed from the scope of that final injunction having given undertakings to the Court not to do the conduct prohibited by that injunction.

**AND WHEREAS** those undertakings will cease to bind such Named Defendants upon discharge of the final injunction.

**AND WHEREAS** an additional review hearing for 2025 has been ordered and listed for 24 November 2025.

**AND WHEREAS** for the avoidance of doubt this Order does not affect any previous costs liability imposed in these Claims, or any breach of the final injunction or undertaking which may have been committed up to this point

**AND UPON** the Claimant having informed the Court that it does not seek to maintain the final injunction

**IT IS ORDERED THAT:**

1. The final injunction is discharged with immediate effect.
2. Once sealed, the Claimant shall serve a copy of this Order on Named Defendants as soon as practicable.
3. Once sealed, 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](mailto:ring2021@protonmail.com) and [insulatebritainlegal@protonmail.com](mailto:insulatebritainlegal@protonmail.com)
    - ii. Just Stop Oil's email addresses: [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com) and [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
    - iii. Extinction Rebellion's email address: [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk)
    - iv. Animal Rebellion email addresses: [actions@animalrebellion.org](mailto:actions@animalrebellion.org), [fundraising@animalrebellion.org](mailto:fundraising@animalrebellion.org), [integration@animalrebellion.org](mailto:integration@animalrebellion.org), [talks@animalrebellion.org](mailto:talks@animalrebellion.org), [global@animalrebellion.org](mailto:global@animalrebellion.org), [localgroups@animalrebellion.org](mailto:localgroups@animalrebellion.org), [media@animalrebellion.org](mailto:media@animalrebellion.org), [governance@animalrebellion.org](mailto:governance@animalrebellion.org), [pressoffice@animalrebellion.org](mailto:pressoffice@animalrebellion.org), [finance@animalrebellion.org](mailto:finance@animalrebellion.org) and [techsupport@animalrebellion.org](mailto: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
4. For the avoidance of doubt, compliance with paragraph 3 shall not constitute service.
5. No Order as to costs for this hearing.
6. For the avoidance of doubt this Order does not affect any previous costs liability imposed in these Claims.

**BY THE COURT**

**The Honourable Mr Justice Morris**

Dated: [insert date]

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) 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, A5201 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

---

## ORDER

---

**WHEREAS** a final injunction was made in the above Claim on 8 June 2023 for 5 years against the Defendants, subject to annual review hearings.

**AND WHEREAS** certain Named Defendants were removed from the scope of that final injunction having given undertakings to the Court not to do the conduct prohibited by that injunction.

**AND WHEREAS** those undertakings will cease to bind such Named Defendants upon discharge of the final injunction.

**AND WHEREAS** an additional review hearing for 2025 has been ordered and listed for 24 November 2025.

**AND WHEREAS** for the avoidance of doubt this Order does not affect any previous costs liability imposed in these Claims, or any breach of the final injunction or undertaking which may have been committed up to this point

**AND UPON** the Claimant having informed the Court that it does not seek to maintain the final injunction

**IT IS ORDERED THAT:**

1. The final injunction is discharged with immediate effect.
2. Once sealed, the Claimant shall serve a copy of this Order on Named Defendants as soon as practicable.
3. Once sealed, 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](mailto:ring2021@protonmail.com) and [insulatebritainlegal@protonmail.com](mailto:insulatebritainlegal@protonmail.com)
    - ii. Just Stop Oil's email addresses: [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com) and [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
    - iii. Extinction Rebellion's email address: [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk)
    - iv. Animal Rebellion email addresses: [actions@animalrebellion.org](mailto:actions@animalrebellion.org), [fundraising@animalrebellion.org](mailto:fundraising@animalrebellion.org), [integration@animalrebellion.org](mailto:integration@animalrebellion.org), [talks@animalrebellion.org](mailto:talks@animalrebellion.org), [global@animalrebellion.org](mailto:global@animalrebellion.org), [localgroups@animalrebellion.org](mailto:localgroups@animalrebellion.org), [media@animalrebellion.org](mailto:media@animalrebellion.org), [governance@animalrebellion.org](mailto:governance@animalrebellion.org), [pressoffice@animalrebellion.org](mailto:pressoffice@animalrebellion.org), [finance@animalrebellion.org](mailto:finance@animalrebellion.org) and [techsupport@animalrebellion.org](mailto: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

4. For the avoidance of doubt, compliance with paragraph 3 shall not constitute service.

5. No Order as to costs for this hearing.

**BY THE COURT**

**The Honourable Mr Justice Morris**

Dated: [insert date]

**IN THE HIGH COURT OF JUSTICE**  
**KING'S BENCH DIVISION**

Before: The Honourable Mr Justice Morris  
On: 12 May 2025

Claim No. QB-2021-003841

BETWEEN

TRANSPORT FOR LONDON

-and-

(1) PERSONS UNKNOWN DELIBERATELY CAUSING THE BLOCKING OF  
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

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

Claimant

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

Claim No. KB-2022-003542

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) 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, A5201 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**

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**ORDER**

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**WHEREAS** yearly review hearings have been ordered in respect of the Final Injunctions (so long as those injunctions remain in force) made in the above Claims being hereafter described as follows: Claim Nos. QB-2021-003841 and QB-2021-004122 are referred to as the “**TfL IB Claims**” and Claim No. KB-2022-003542 is referred to as the “**TfL JSO Claim**”. The Final Injunction, as varied, in the TfL IB Claims was made on 4 February 2025 by Mr Justice Morris and the Final Injunction in the TfL JSO Claim was made on 8 June 2023 by Mr Justice Eyre.

**AND UPON** this being the second such review hearing.

**AND UPON** the Claimant on 26 February 2025 making a slip rule application under CPR r40.12 in respect of the Judgment Order of Morris J dated 3 May 2023.

**AND UPON** hearing counsel for the Claimant, Andrew Fraser-Urquhart KC and Charles Forrest, counsel for 37 Named Defendants in the TfL IB Claims (Named Defendants 2, 7, 20-22, 24, 26-28, 39, 43, 47, 49-50, 58, 61-62, 64, 66, 69, 82, 86, 72, 76, 78, 99-100, 113, 115, 117, 120-121, 123, 125, 128-129, 134), Peter Lockley, and Matthew Parry in person (Named Defendant 143 in the TfL JSO Claim).

**AND UPON** the Claimant undertaking:

- 1) immediately to seek to agree, with Named Defendants in the TfL IB Claims, the level of each of their costs liability in those Claims, in accordance with paragraph 5 of the Judgment Order dated 3 May 2023 (as amended),
- 2) in respect of any such Named Defendant where cost liability is not agreed, to begin within 3 months of the date of this Order detailed assessment proceedings against them within the meaning of CPR r47.6,
- 3) not to seek interest on such costs from a date earlier than (a) any date of assessment and/or (b) 28 days after any agreement of costs liability, unless agreed otherwise.

**IT IS ORDERED THAT:**

1. The Claimant's slip rule application is allowed. An amended version of the Judgment Order dated 3 May 2023 is attached hereto.
2. Without prejudice to the provision for an annual review in paragraph 11 of each of the Final Injunctions, an additional review hearing shall take place in November 2025, reserved to Mr Justice Morris ("**the November 2025 review hearing**").
3. For the purposes of listing the November 2025 review hearing the Claimant is, within 7 days of the sealing of this Order, to provide the Listing Office with its dates to avoid for the first two weeks of November 2025.
4. The Claimant shall file and serve its skeleton argument and other material relied upon no later than 14 (clear) days before the November 2025 review hearing.
5. Any Defendant who wishes to make submissions/representations or rely on evidence in the November 2025 review hearing shall file and serve them no later than 7 (clear) days before that hearing.
6. For the avoidance of doubt the Final Injunctions shall remain in force until the November 2025 review hearing.
7. No Order for costs in respect of this second review hearing.
8. 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](mailto:ring2021@protonmail.com) and [insulatebritainlegal@protonmail.com](mailto:insulatebritainlegal@protonmail.com)
    - ii. Just Stop Oil's email addresses: [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com) and [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
    - iii. Extinction Rebellion's email address: [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk)
    - iv. Animal Rebellion email addresses: [actions@animalrebellion.org](mailto:actions@animalrebellion.org), [fundraising@animalrebellion.org](mailto:fundraising@animalrebellion.org), [integration@animalrebellion.org](mailto:integration@animalrebellion.org), [talks@animalrebellion.org](mailto:talks@animalrebellion.org), [global@animalrebellion.org](mailto:global@animalrebellion.org), [localgroups@animalrebellion.org](mailto:localgroups@animalrebellion.org), [media@animalrebellion.org](mailto:media@animalrebellion.org),

[governance@animalrebellion.org](mailto:governance@animalrebellion.org), [pressoffice@animalrebellion.org](mailto:pressoffice@animalrebellion.org),  
[finance@animalrebellion.org](mailto:finance@animalrebellion.org) and [techsupport@animalrebellion.org](mailto: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

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

### **Communications with the Claimant**

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: 12 May 2025

**Amended under the Slip Rule CPR r40.12. The amendment, contained in paragraph 5 of this Order, is in red and underlined text. By Mr Justice Morris on the 12<sup>th</sup> day of May 2025**

**IN THE HIGH COURT OF JUSTICE**  
**KING'S BENCH DIVISION**

**Before: The Honourable Mr Justice Morris**  
**On: the 3<sup>rd</sup> day of May 2023**



**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) 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

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## JUDGMENT ORDER

as amended under CPR r40.12

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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 undertakings having been received from Named Defendants 9, 65, and 135, ("the Undertaking Defendants") to whom this Order does not apply

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 who attended unrepresented for part of Day 1 of Trial

### IT IS ORDERED THAT:

1. The term "Defendants" refers to both "persons unknown" and Named Defendants, as defined. In this Judgment Order, "Named Defendants" is a reference to those individuals listed, each

with an identifying number, in Annex 1 (Schedule of Named Defendants, as amended) to the Claim Form in each of the above Claims. “Undertaking Defendants” and “Discontinuance Defendants” refers to specific Named Defendants who are identified above and below respectively.

2. The Claimant has permission under r38.2(2)(a) to discontinue its Claim(s) against Named Defendants 8, 34, 91, 102, 108, and 112 (“**the Discontinuance Defendants**”). This discontinuance shall take effect and the Claim(s) against the Discontinuance Defendants shall be brought to an end on the date of this Order (not the date it was sealed, if different)
3. Service under r38.3(1)(b) of the notice of discontinuance on the Discontinuance Defendants is dispensed with under r6.28
4. Except the Undertaking Defendants and Discontinuance Defendants, the Claims against all Defendants in the above Claims are allowed. A Final Injunction Order against such Defendants is the subject of a different Order.
5. Except the Undertaking Defendants and Discontinuance Defendants, the Named Defendants must pay the Claimant’s costs in these Claims, including those costs which had been reserved by previous orders. Those costs shall be subject to detailed assessment, with the total amount to be divided equally amongst those Defendants to whom this paragraph applies. Such sums to be paid within 28 days of the service upon them of a notification of the final sum payable.
6. Each Discontinuance Defendant is awarded on the standard basis any recoverable costs incurred up to the date of this Order as a result of these Claims. Those costs are to be assessed if not agreed by the Claimant.
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](mailto:ring2021@protonmail.com) and [insulatebritainlegal@protonmail.com](mailto:insulatebritainlegal@protonmail.com)
    - ii. Just Stop Oil’s email addresses: [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com) and [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
    - iii. Extinction Rebellion’s email address: [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk)

- iv. Animal Rebellion email addresses: [actions@animalrebellion.org](mailto:actions@animalrebellion.org), [fundraising@animalrebellion.org](mailto:fundraising@animalrebellion.org), [integration@animalrebellion.org](mailto:integration@animalrebellion.org), [talks@animalrebellion.org](mailto:talks@animalrebellion.org), [global@animalrebellion.org](mailto:global@animalrebellion.org), [localgroups@animalrebellion.org](mailto:localgroups@animalrebellion.org), [media@animalrebellion.org](mailto:media@animalrebellion.org), [governance@animalrebellion.org](mailto:governance@animalrebellion.org), [pressoffice@animalrebellion.org](mailto:pressoffice@animalrebellion.org), [finance@animalrebellion.org](mailto:finance@animalrebellion.org) and [techsupport@animalrebellion.org](mailto: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.

#### **Communications with the Claimant**

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

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

**BY THE COURT**

**The Honourable Mr Justice Morris**

**Dated: 3 May 2023**

Party: Claimant  
Name: Carl Eddleston  
No: 3  
Date: 6 May 2025

**IN THE HIGH COURT OF JUSTICE**  
**KING'S BENCH DIVISION**

Claim No. QB-2021-003841

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) 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

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

Claim No. KB-2022-003542

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) 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, A5201 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**

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**Witness Statement of CARL EDDLESTON**

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I, **CARL EDDLESTON**, of Transport for London (“TfL” / “**the Claimant**”) will say as follows:

1. I am the Director Network Management and Resilience at TfL. I joined TfL in 2006 and have held a variety of positions having varied responsibility from road network design to Chief Engineer for Road Network Performance. I am duly authorised by TfL to make this statement.
2. This is my third witness statement. My first was written in November 2021 to support TfL’s Claim No. QB-2021-003841 and what would become Claim No: QB-2021-004122, both of which relate to the protest group Insulate Britain (“**the TfL IB Claims**”). My second witness statement was written in April 2024 for the

purposes of the first review hearing which took place before The Honourable Mr Justice Morris on 13 and 20 May 2024. The other TfL Claim to which this witness statement relates is Claim No. KB-2022-003542 which relates to the protest organisation Just Stop Oil (“**the TfL JSO Claim**”). All together those Claims are called “**the TfL Claims**” herein.

3. Final injunctions were made in the TfL Claims following Trials before Morris J and Eyre J in spring 2023 (“**Final Injunctions**”). Following the first review hearing on 13 and 20 May 2024 and judgment given on 16 January 2025, the Final Injunctions were maintained by Morris J. The JSO Final Injunction was completely unaltered. On 4 February 2025 the IB Final Injunction was discharged against Named Defendants in the TfL IB Claims (“**the Lewis Defendants**”) who gave an undertaking in effectively the same terms as that injunction. But it was maintained against 15 Named Defendants in the TfL IB Claims who did not give such an undertaking.
4. This statement is made for the second review hearing in the TfL Claims listed for 12 May 2025. This hearing is due to be heard by Morris J.
5. An important part of the context for this review hearing is that on 27 March 2025 JSO made a statement on its own website (“**the 27 March Statement**”) which appears to say that they will no longer be engaging in the kind of disruptive protests which have given rise to these Final Injunctions. There was, however, a final ‘action’ in London on 26 April 2025<sup>1</sup> (“**26 April Action**”).
6. This witness statement’s purposes are to:
  - a. set out the recent service and notification which has been undertaken by TfL in the TfL Claims;
  - b. as part of TfL’s duty of full and frank disclosure, update the Court on what appears to be JSO’s current position and intentions and why, including giving detail on the 27 March Statement and the 26 April Action. This section will also

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<sup>1</sup> <https://juststopoil.org/2025/03/27/just-stop-oil-is-hanging-up-the-hi-vis/>

set out what informed observers are saying may happen to JSO and other climate protest groups in the future;

- c. as part of TfL's duty of full and frank disclosure, inform the Court on what JSO said and did between the first review hearing on 13 and 20 May 2024 and its 27 March Statement;
  - d. explain TfL's position in this second review hearing in light of the above. In summary TfL invites the Court to maintain the Final Injunctions for up to 1 year.
7. As can be seen from the above, this witness statement will not primarily focus on IB. This is because, although it has certainly not disavowed its aims and methods, it has for some time now ceased to be a distinct banner under which protests take place. Its last protest was on 24 June 2023 when supporters of IB, JSO and Extinction Rebellion slow marched from Parliament Square to the Home Office, delaying motor traffic<sup>2</sup>, as mentioned in my second witness statement drafted for the first review hearing. IB's last regular protests were in October 2022, as covered in numerous witness statements in the TfL Claims since then.

**a) Recent service and notification by TfL in the TfL Claims**

8. I am informed by TfL's lawyers that TfL served/notified the following people/organisations with the following material<sup>3</sup>:
- a. at 10.49am on 23 January 2025, junior counsel for TfL emailed draft versions of the Judgment Order and the IB Final Injunction Order to Giovanna Lewis (Named Defendant 128 in the TfL IB Claims) for hers and the other Lewis Defendants' consideration, prior to those drafts being sent to Morris J through his clerk that afternoon. That email also confirmed that Ms Lewis and the other

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<sup>2</sup> <https://juststopoil.org/2023/06/24/dont-deport-marcus-public-march-to-demand-home-office-end-deportations-of-peaceful-demonstrators/>

<sup>3</sup> Note references to Named Defendants in the TfL Claims excludes those who have been discontinued against by TfL (at the Trials in 2023). Also note that on or around 24 October 2024 the Good Law Practice ceased to act for those Named Defendants who they had previously been acting for and so from then on those and all other Named Defendants were acting in person.

Lewis Defendants could alternatively make comments to Morris J on those draft Orders after they had been sent to him. Ms Lewis emailed TfL junior counsel back at 11am saying that she did not have enough time to comment that day but if she had any comments she would make them to Morris J through his clerk. No such comments are believed to have been made by Ms Lewis, or any of the Lewis Defendants through her. Prior to being formally made and sealed, minor amendments to those draft Orders were agreed through email exchanges between Morris J (through his clerk) and counsel for TfL, with Giovanna Lewis being copied into those email exchanges;

- b. on 6 February 2025, TfL emailed or posted Morris J's second review hearing judgment and the sealed Judgment Order in the TfL Claims made by Morris J on 4 February 2025 to Named Defendants in the TfL JSO Claim who are not also named defendants in the TfL IB Claims. TfL also placed a copy of them on the TfL and GLA/Mayor of London Website and emailed them to IB, JSO, Extinction Rebellion, and Animal Rebellion. Giovanna Lewis had said via email to Morris J's clerk and TfL on 5 January 2025 that she would send the judgment to all Named Defendants in the TfL IB Claim. The result of TfL's and Ms Lewis' combined efforts was that all Named Defendants in the TfL Claims were sent the judgment;
- c. between 4 and 6 March 2025, the 15 Named Defendants listed in Annex 1 to the sealed IB Final Injunction made by Morris J on 4 February 2025 (i.e. those who have not given an undertaking and who therefore continue to be bound) were served with the following using process servers and the alternative service provisions contained in that Order: that sealed Order, the above-mentioned sealed Judgment Order, TfL's slip rule application (which I am told is to be determined at this second review hearing), and notification of this second review hearing;
- d. on 6 March 2025, all other Named Defendants in the TfL IB Claim were served with the following via email or post: the above-mentioned Judgment Order, the above-mentioned slip rule application, and notification of this second review hearing;

- e. on 6 March 2025, all Named Defendants in the TfL JSO Claim, excluding any person already served by virtue of the above, were served with the following via email or post: the above-mentioned Judgment Order and notification of this second review hearing;
  - f. on 7 March 2025 the notification and publicisation requirements in para 7 of the above-mentioned IB Final Injunction and para 6 of the above-mentioned Judgment Order were complied with, except it appears that in error the IB Final Injunction was not uploaded onto the TfL or GLA/Mayor of London websites at this time. It was published on the TfL website on 2 May 2025 and on that day a request was sent to the GLA/Mayor of London's web team to publish it on their website;
  - g. on 3 April 2025, in accordance with its duty of full and frank disclosure, TfL brought JSO's 27 March Statement and the proposed 26 April Action to the Court's attention in a letter sent via email to Morris J through his clerk, with Giovanna Lewis copied into that email. That letter was also sent to all Named Defendants in the TfL Claims between 9-11 April 2025 and it was also emailed to IB, JSO, Extinction Rebellion, and Animal Rebellion around that time. That letter also explained the reasons why, notwithstanding JSO's 27 March Statement, TfL wanted the Final Injunctions to remain in place until this second review hearing, at least.
9. On 17 January 2025 junior counsel for TfL emailed the Court, copying in Giovanna Lewis (Named Defendant 128 in the TfL IB Claims), saying (emphasis in original):

*"The Lewis Applicants who are subject to the Final JSO Injunction by reason of not having offered an undertaking in the TfL JSO Claim are: Ben Taylor, Emily Brocklebank, Ben Newman, Samuel Johnson. These Lewis Applicants form part of the class of named defendants who Ms Lewis has volunteered to notify of Morris J's review hearing judgment (once it is finalised on Monday) and draft orders (once they have been drafted by TfL before 4pm on Thursday). Unless requested otherwise by the Court, TfL will leave it to Ms Lewis to notify these 4 Lewis Applicants of their continuing opportunity to offer an undertaking in the TfL JSO Claim, to cover the 6 locations/roads which are not covered by their undertaking in the TfL IB Claims."*

TfL has heard nothing from these 4 Lewis Applicants about offering such an undertaking in the TfL JSO Claim.

**b) What appear to be JSO's current position and intentions and why, including giving detail on its 27 March statement and 26 April Action**

Introduction

10. I personally cannot know for sure what JSO's current position and intentions are and why, and I am told that JSO are unlikely to submit any evidence to the Court themselves about them.
11. Below, in compliance with TfL's duty of full and frank disclosure, I set out a summary of JSO's own published statements and actions. I also set out other potentially relevant information, including investigative reports into JSO undertaken by well-established media outlets since JSO's 27 March Statement. These have all been obtained through online research, with footnotes in this statement providing the source of the information.
12. Much of the discussion below inevitably centres on organisations, including JSO itself. However, it must not be forgotten that these protesting organisations are not monoliths. In organisational terms they are informal and decentralised. Each of its 'membership' is fluid, and often overlaps with other organisation, as these TfL Claims show in relation to JSO and IB. Some organisations enter into coalition together, for example the JSO Coalition which includes JSO, IB, and others. Where that happens, it can be unclear the extent to which each or all such organisations retain independence or a distinct identity. Inevitably, not all 'members' agree with their organisation's public statements or actions, and this can eventually result in the creation of splinter organisations. For information on the foregoing, see the witness statement of Abbey Ameen for the JSO Trial dated 2 April 2023 at paragraphs 18-29, his Exhibit AA/9 in the TfL JSO Claim, his Exhibit AA/1 in the TfL IB Claim, and also see below.

JSO's 27 March Statement and 26 April Action

13. JSO's 27 March Statement and other similar statements appear to say that they will no longer be engaging in the kind of disruptive protests which have given rise to these Final Injunctions.
14. That Statement said as follows (all emphasis by way of underlining in quotations in this witness statement are added by me, unless stated otherwise):

***“Just Stop Oil is hanging up the hi vis***

*Press / March 27, 2025*

*Three years after bursting on the scene in a blaze of orange, at the end of April we will be hanging up the hi vis.*

*Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful.*

*So it is the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison. We have exposed the corruption at the heart of our legal system, which protects those causing death and destruction while prosecuting those seeking to minimize harm. Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK's oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen.*

*This is not the end of civil resistance. Governments everywhere are retreating from doing what is needed to protect us from the consequences of unchecked fossil fuel burning. As we head towards 2°C of global heating by the 2030s, the science is clear: billions of people will have to move or die and the global economy is going to collapse. This is unavoidable. We have been betrayed by a morally bankrupt political class.*

*As corporations and billionaires corrupt political systems across the world, we need a different approach. We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Nothing short of a revolution is going to protect us from the coming storms.*

*We are calling on everyone who wants to be a part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. [Sign up here.](#) See you on the streets.*

***ENDS***

*Press contact: 07762 987334*

*Press email: [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)*

*High quality images & video here: <https://juststopoil.org/press-media>*

*Website: <https://juststopoil.org/>*

Facebook: <https://www.facebook.com/JustStopOil/>  
Instagram: <https://www.instagram.com/just.stopoil/>  
Twitter: [https://twitter.com/JustStop\\_Oil](https://twitter.com/JustStop_Oil)  
Youtube: <https://juststopoil.org/youtube>  
TikTok: <https://www.tiktok.com/@juststopoil>

### **Notes to Editors**

*[1] Just Stop Oil is committed to nonviolent direct action to resist the destruction of our communities as a result of climate breakdown. We do not consent to plans that will result in 3C of warming and mass death.*

**We demand an emergency plan to Just Stop Oil by 2030. Our government must work with other governments to end the extraction and burning of all oil, gas and coal by 2030.**

*Just Stop Oil is a member of the A22 Network of civil resistance projects.*

*Just Stop Oil 'Blue Lights' policy: our policy is, and has always been, to move out of the way for emergency vehicles with siren sounding and 'blue lights' on.*

*We take all possible steps to ensure that no-one's safety is compromised by our actions.*

**[2] During our 3 year history Just Stop Oil supporters have been arrested 3,300 times and imprisoned 180 times, for having broken laws that were drafted by the fossil fuel industry. 7 people are now in prison serving sentences of up to 4 years and 8 are on remand. 16 Just Stop Oil supporters are due to be sentenced in the next few months."**

15. Various different, summary versions of JSO's 27 March Statement were also posted by JSO on its social media profile pages, including on Twitter/X<sup>4</sup>, Instagram<sup>5</sup>, and Youtube<sup>6</sup>.
16. In an article written from prison by Indigo Rumbelow (Named Defendant 114 in the TfL IB Claims 50 in the TfL JSO Claim) and published in the Guardian newspaper on 5 April 2025, she said, "*Just Stop Oil is ending its campaign of non-violent civil disruption*"<sup>7</sup>. Although she was not expressly doing so here, Ms Rumbelow has previously acted as a spokesperson for JSO.

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<sup>4</sup> [https://x.com/JustStop\\_Oil?ref\\_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Eauthor](https://x.com/JustStop_Oil?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Eauthor)

<sup>5</sup> <https://www.instagram.com/just.stopoil/?hl=en>

<sup>6</sup> <https://www.youtube.com/@just-stop-oil/community>

<sup>7</sup> <https://www.theguardian.com/commentisfree/2025/apr/05/message-prison-just-stop-oil-civil-disruption-government-climate-collapse>

17. Prior to the 26 April Action, JSO posted this on its website about that Action in early April and 25 April respectively<sup>8</sup>:

***“Join Just Stop Oil for One Last Action  
ONE. LAST. ACTION***

*Three years after bursting on the scene in a blaze of orange, at the end of April we’ll be hanging up the hi vis but we will be taking our resistance to the streets one last time and **everyone is invited**.*

*We will all be coming together for one day of action on Saturday April 26th at Parliament Square. This means **everyone**: whether you’ve taken action in the past, or are still considering joining, the plan is we all converge on the streets of London on the same day.*

*This will be a lower-risk action and we won’t be pushing for arrest. We know that arrest can be a barrier to stepping out, and we will be doing our best to minimize that risk so that everyone can join. This is an opportunity for all of us to come together in our numbers and show that civil resistance is alive and well, that it remains a force for change in this country. If you have ever considered taking action with Just Stop Oil, now is the time, it’s your final chance.”*

***“Just Stop Oil: “Resistance works and we’re just getting started”***

*Press, Uncategorized / April 25, 2025*

*Hundreds of Just Stop Oil supporters are marching through the streets of London tomorrow in a defiant celebration of the effectiveness of civil resistance. The march is also to honour all those who have taken action with Just Stop Oil since 2022 including those who have been incarcerated as political prisoners.*

*The march is starting in St James Park at 12:30pm. It will head around Parliament Square, past Downing Street and to the Royal Courts of Justice, where Tim Crosland for Defend our Juries will speak to Just Stop Oil supporters. Later the march will head across the river to Jubilee Gardens where Just Stop Oil supporters will hang up their hi-vis vests before listening to speeches from Just Stop Oil spokespeople Sarah Lunn and Chloe Naldrett and a recorded message from Roger Hallam in prison.*

*A Just Stop Oil spokesperson said:*

*“Just Stop Oil’s initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We know that resistance works and it’s needed now more than ever, so we’re just getting started.*

*“The fascists are coming. The super rich are bleeding us dry. We face 2°C of global heating in the 2030s and billions of deaths within decades. Nothing short of a revolution is going to stop this.*

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<sup>8</sup> <https://actionnetwork.org/forms/join-us-to-reclaim-parliament-in-2025/>

*The current political and economic system is broken and no-one is coming to fix it unless we do it for ourselves. So we are building a revolution in the UK's broken political and economic system by taking back power from the rich and putting ordinary people in charge. Sign up to take part in the House of the People at [www.HouseOfThePeople.UK](http://www.HouseOfThePeople.UK).*

*We are also building a new street movement rooted in local communities and dedicated to nonviolent civil resistance on a scale that Just Stop Oil never even dreamt of. Help put people on the streets by funding the next phase of civil resistance at [juststopoil.org/donate](http://juststopoil.org/donate).*

*On March 27th Just Stop Oil announced it was “hanging up the hi vis” and that today’s action would be the last. However, Just Stop Oil supporters will continue to tell the truth in court, to speak out for our political prisoners and to help build what comes next.*

Since 2022, 3,300 people have been arrested after taking action with Just Stop Oil and over 180 have spent time in prison. There are currently 11 people in prison serving sentences as a result of actions with Just Stop Oil and at least 5 more are expected to join them in May. ”<sup>9</sup>

18. At the 26 April Action:

- a. several hundred JSO supporters slow marched and occasionally stood in the road, thereby delaying and blocking motor traffic. They marched from Parliament Square/St James’ to the area around Waterloo Railway Station, via Whitehall (pausing at Downing Street), via Trafalgar Square, via the Strand (pausing at the Royal Courts of Justice), presumably via either Blackfriars or Waterloo Bridge<sup>10</sup>, before ending outside the Shell Building on Belvedere Street near Waterloo Railway Station. There is no evidence that the Final Injunctions, which expressly permit slow marching, were breached;

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<sup>9</sup> <https://juststopoil.org/2025/04/25/just-stop-oil-resistance-works-and-were-just-getting-started/>

<sup>10</sup> [https://www.youtube.com/watch?v=b6HfZa\\_QWrc](https://www.youtube.com/watch?v=b6HfZa_QWrc) ; <https://www.standard.co.uk/news/uk/london-people-roger-hallam-traffic-square-police-b1224469.html> ; <https://www.standard.co.uk/news/uk/london-people-roger-hallam-traffic-square-police-b1224469.html> ; <https://www.timeout.com/uk/news/in-photos-just-stop-oils-final-protest-on-the-streets-of-london-042625> ; <https://www.itn.co.uk/news/just-stop-oil-hold-final-protest-london-0> ; <https://www.independent.co.uk/news/uk/home-news/just-stop-oil-protest-london-b2740071.html> ; <https://socialistworker.co.uk/environment/just-stop-oil-can-proudly-say-resistance-works/> ; <https://www.lbc.co.uk/news/uk/just-stop-oil-final-march/> ; <https://www.standard.co.uk/news/uk/london-people-roger-hallam-traffic-square-police-b1224469.html> ; <https://www.theguardian.com/world/2025/apr/28/first-edition-just-stop-oil-legacy>

- b. some JSO supporters literally hung up their orange branded JSO hi-vis jackets on a washing-line with pegs, outside the Shell Building<sup>11</sup>. A message recorded from prison by co-founder of JSO and Extinction Rebellion, Roger Hallam, was played to the crowd. He said, *“I didn’t agree with the winding up of JSO and I want to see a lot more mobilisation and all the rest of it. In addition, I’ve been given a weather report which says that next week hundreds of Asian cities will have all-time high record temperatures and it will be 50C in the Philippines. No doubt if a million people have died in record temperatures by this time next week then people will be putting on their hi vis rather than hanging them up.”*<sup>12</sup>
- c. motor vehicle drivers who were being blocked and frustrated by the protesters angrily remonstrated with them and one even slowly drove into them until the vehicles pressed against protesters. The drivers’ actions unsurprisingly caused distress, personal danger, and police intervention<sup>13</sup>. This is what also has happened in previous JSO protests, see witness statement of Abbey Ameen dated 2 April 2023 for the JSO Trial at paras. 171a, 176.

#### Possible reasons behind JSO’s 27 March Statement

19. The *Guardian* newspaper environment correspondents Matthew Taylor and Damien Gayle, writing in that newspaper on 5 April 2025 having spoken with sources within JSO and elsewhere, have given their own analysis of JSO’s 27 March Statement and its future. Those journalists say that, like Extinction Rebellion and IB before it, JSO is making a well-worn transition from being the radical vanguard of the climate protest movement to a more moderate and less active force.
20. In contrast to what JSO says is the reason for its change of approach (victory in achieving its core aim), those journalists say the real reason for it may be protester fatigue from social backlash, more and longer prison sentences for convicted

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<sup>11</sup>

[https://x.com/JustStop\\_Oil/status/1916837586162565155?ref\\_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Etweet](https://x.com/JustStop_Oil/status/1916837586162565155?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Etweet) ; [https://www.youtube.com/watch?v=b6HfZa\\_QWrc](https://www.youtube.com/watch?v=b6HfZa_QWrc)

<sup>12</sup> <https://www.standard.co.uk/news/uk/london-people-roger-hallam-rafalgar-square-police-b1224469.html>

<sup>13</sup> <https://www.bbc.co.uk/news/articles/cn7xpxp6xxmo> ; [https://www.youtube.com/watch?v=b6HfZa\\_QWrc](https://www.youtube.com/watch?v=b6HfZa_QWrc) ; <https://www.standard.co.uk/news/uk/london-people-roger-hallam-rafalgar-square-police-b1224469.html>

protesters, and new legislation in the form of the Police, Crime, Sentencing, and Courts Act 2022 and the Public Order Act 2023 which have both lengthened some sentences and created various new offences targeting disruptive protesters<sup>14</sup>.

21. Various journalists at The Times newspaper, including the Environment and Crime editors, agree. In an article published by that newspaper on 29 March 2025 they said, “[...] *the reality is the campaign has also been policed and legislated into oblivion*”<sup>15</sup>.
22. This is corroborated in an article published by the BBC on 25 April 2025 by Justin Rowlatt, Climate Editor at the BBC, entitled “*Just Stop Oil was policed to extinction - now the movement has gone deeper underground*”. In that article Mr Rowlatt writes, “*The group's official line is that they've won their battle because their demand that there should be no new oil and gas licences is now government policy. But privately members of JSO admit tough new powers brought in to police disruptive protests have made it almost impossible for groups like it to operate.*”<sup>16</sup>
23. This is also corroborated by Annie Kelly writing in the Guardian on 28 April 2025<sup>17</sup>.
24. And also by Richard Hames, writing for Novara Media, who wrote on 28 March 2025, “*It's no secret that JSO has faced severe backlash from the state. The movement has been decimated through the imprisonment of its key activists – including co-founder Roger Hallam – but also many others. From inside the group, I heard that churn had increased: it was proving tricky to recruit when the jail time was no longer a mere possibility but a tangible prospect. A long-running criticism of both XR and JSO, that they recklessly endangered their actionists, seems to have finally had an effect on sign ups [...] It's clear that repression in the form of long sentences has had a dampening effect*”<sup>18</sup>.

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<sup>14</sup> <https://www.theguardian.com/environment/2025/apr/05/what-next-climate-activism-just-stop-oil-hanging-up-hi-vis-protests-arrests> ; <https://www.theguardian.com/environment/2025/mar/08/a-new-phase-why-climate-activists-are-turning-to-sabotage-instead-of-protest>

<sup>15</sup> <https://www.thetimes.com/uk/environment/article/just-stop-oil-news-jso-wrnn62jks> (paywall)

<sup>16</sup> <https://www.bbc.co.uk/news/articles/cz6denxzweeo>

<sup>17</sup> <https://www.theguardian.com/world/2025/apr/28/first-edition-just-stop-oil-legacy>

<sup>18</sup> <https://novaramedia.com/2025/03/28/goodbye-to-just-stop-oil-or-is-it/>

25. Something which may support those journalists' views about the true reasons why JSO is stopping its deliberately disruptive protests is that, as explained further below, JSO has been aware of the Government's commitment to end all new licences for fossil fuel extraction since at least 10 July 2024.<sup>19</sup> It is therefore unclear why the 27 March Statement was not made by JSO until much later.

#### Possible future of JSO and climate protesting more generally

##### *Summary of evidence*

26. In summary and as explained below:
- a. it appears that JSO will continue to exist as an organisation, albeit very likely as a less active force. If JSO keeps to the 27 March Statement, then its methods will not include deliberately disruptive civil resistance;
  - b. it appears JSO will continue to form part of an umbrella co-ordinating group which it has recently joined, called Umbrella. Umbrella includes Youth Demand, which was set up by younger supporters of JSO, which has and is continuing to engage in deliberately disruptive civil resistance protests;
  - c. supporters or ex-supporters of JSO appear to be planning to set up a new organisation with new demands and tactics. These are yet to be defined, but will apparently not replicate the deliberately disruptive civil resistance tactics of JSO (and Youth Demand);
  - d. other more radical JSO supporters/ex-supporters have possibly already or possibly soon will come to support organisations which have sprung up in the last year or so. These groups advocate a protesting method of clandestine sabotage operations, as opposed to JSO's (and Youth Demand's) method of open and accountable civil resistance. These groups, which include Shut the System and Tyre Extinguisher, are said to now embody the radical vanguard of climate protesting, which, as mentioned above, JSO itself once embodied.

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<sup>19</sup> <https://news.sky.com/video/just-stop-oil-activists-paint-parliament-square-orange-in-latest-protest-13176147>

## *Future of JSO*

27. JSO is not saying that it will cease to exist altogether:

a. its 27 March Statement said: “[...] *Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK’s oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen. This is not the end of civil resistance [...]*”. Its statement on 25 April 2025 quoted above said similar.

b. on JSO’s website:

i. it says on its home webpage, “*Our new demand: That the UK Government sign up to a Fossil Fuel Treaty to Just Stop Oil by 2030. Our governments must work together to establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fast, fair, and just transition. This can be accomplished by endorsing the Fossil Fuel Non-Proliferation Treaty Initiative and seeking a negotiating mandate to establish the treaty*”<sup>20</sup>. It largely repeats this on its FAQ page, before saying “*WHY DO WE NEED TO PHASE OUT FOSSIL FUELS? We have already passed 1.5°C of global heating and are expected to pass 2°C in the 2030s. The catastrophic effects are increasingly being felt in poor countries and communities across the world. Innocent people already face unlivable conditions. Drowning in their homes. Overheating in the streets. Starving as crops fail. Burning more fossil fuels will kill hundreds of millions of people and tip us into societal collapse. We urgently need all countries to phase out the production and use of fossil fuels*”<sup>21</sup>

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<sup>20</sup> <https://juststopoil.org>

<sup>21</sup> <https://juststopoil.org/faqs-updated/>

- ii. the group is still accepting donations<sup>22</sup>, as JSO's 27 March Statement and another statement quoted above said it would continue to do;
  - iii. it is still calling for volunteers to e.g. make phone calls, help to run its virtual and in-person meetings, help to run its social media accounts, support protesters after arrest or going to court, and to raise funds for upcoming projects<sup>23</sup>;
  - iv. it is still running events which post-date the 'final' 26 April Action. For example on Monday 28 April 2025 it appears to have held a 'Just Stop Oil Welcome Talk' on the topic of "*1.5 is dead- Now What? [This talk will] take an unflinching look at the state we're in, what we're doing about it and how we will win.*". It appears from the webpage that this is a recurring talk which will continue into the future every Monday<sup>24</sup>;
  - v. JSO's FAQ webpage says they are "*willing to take part in nonviolent civil resistance to put pressure on the UK government to act on the climate crisis in order to protect our families and communities. **We are going to cause disruption, making our demand unignorable***"<sup>25</sup>.
- c. in a Guardian newspaper article by Damian Gayle on 27 March 2025, he summarised a JSO source as saying, "*the campaign would continue to exist in the courts and in the prisons*<sup>26</sup>, but not on the streets [...]"

*Possible new organisation to be set up by JSO supporters*

28. It has been reported that some JSO supporters will set up a new organisation with a new name, demands, and strategy i.e. no longer engaging in deliberately

<sup>22</sup> <https://juststopoil.org/donate/> ; <https://juststopoil.org/2025/04/25/just-stop-oil-resistance-works-and-were-just-getting-started/>

<sup>23</sup> <https://juststopoil.org/volunteer/>

<sup>24</sup> <https://juststopoil.org/come-to-a-talk/>

<sup>25</sup> <https://juststopoil.org/faqs-updated/>

<sup>26</sup> According to a different Guardian article published on 5 April 2025, "*Trials for JSO actions are scheduled through 2025 and 2026 and, for those who took action with Insulate Britain, into 2027*", see <https://www.theguardian.com/environment/2025/apr/05/what-next-climate-activism-just-stop-oil-hanging-up-his-protests-arrests>

disruptive civil resistance, see Damien Gayle's Guardian newspaper article published on 27 March 2025 and repeated in a Guardian podcast published on 29 April 2025<sup>27</sup>.

29. This may be what JSO is alluding to in its statement on 25 April quoted above, which said *"We are also building a new street movement rooted in local communities and dedicated to nonviolent civil resistance on a scale that Just Stop Oil never even dreamt of. Help put people on the streets by funding the next phase of civil resistance at juststopoil.org/donate."*
30. However, the rejection of deliberately disruptive methods by supporters/ex-supporters of JSO is not a 'given'. Justin Rowlett wrote as follows in an article published on 29 March 2025 by the BBC, *"JSO has said its last protest – to be held at the end of April – will mark "the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets". But don't believe it. When pressed, the JSO members I spoke to said they may well turn back to disruptive tactics but under a new name and with a new and as yet unspecified objective."*<sup>28</sup>

#### *Climate protest organisations which undertake clandestine sabotage protests*

31. Damien Gayle has reported in other articles in the Guardian, as has Annie Kelly in the above-mentioned Guardian article<sup>29</sup>, that the climate protesting vanguard has been assumed by new groups such as Shut the System and Tyre Extinguishers. These groups are rejecting the open civil disobedience/resistance tactics of groups like IB and JSO in favour of clandestine sabotage operations against the property of corporations which they see as responsible for the destruction of the climate.<sup>30</sup> And indeed such sabotage has taken place e.g. by cutting underground internet cables serving insurance companies based in the City of London and smashing

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<sup>27</sup> <https://www.theguardian.com/environment/2025/mar/27/just-stop-oil-hangs-up-the-hi-vis-after-three-years-of-climate-action> ; <https://www.theguardian.com/environment/audio/2025/apr/29/why-did-just-stop-oil-just-stop-podcast> at 17:10

<sup>28</sup> <https://www.bbc.co.uk/news/articles/cy0d047810no>

<sup>29</sup> <https://www.theguardian.com/world/2025/apr/28/first-edition-just-stop-oil-legacy>

<sup>30</sup> <https://www.theguardian.com/environment/2025/mar/27/just-stop-oil-hangs-up-the-hi-vis-after-three-years-of-climate-action> ; <https://www.theguardian.com/environment/2025/mar/08/a-new-phase-why-climate-activists-are-turning-to-sabotage-instead-of-protest>

windows, daubing paint on property, supergluing locks on the offices of finance and insurance companies<sup>31</sup>

32. Richard Hames, in the same article mentioned above, wrote *“Is this the end of arrestable actions? A spokesperson for Shut the System, which doesn’t aim to get its activists arrested, told me that the winding down of JSO “clearly signals the end of individually accountable protest”. “People are no longer prepared to get arrested in the increasingly harsh legal climate,” they said. “It forces protest underground, where direct action is more easily sustained because protesters are not going straight to prison. “Direct action works, as Shut The System has seen with companies responding to our demands overnight. With a strategic focus on finance and the diligence of a secure underground movement, we still have hope to transform the system””*<sup>32</sup>. This is corroborated in Annie Kelly’s Guardian article mentioned above<sup>33</sup>.
33. This transition to protest by means of clandestine sabotage tactics, including by Shut the System and Tyre Extinguishers, has also been observed by Justin Rowlatt in the above-mentioned BBC article. In that article Mr Rowlatt wrote<sup>34</sup>,

*“In this context, some climate activists have concluded that it is time to drop the movement's long-standing commitment to accountability – they will undertake disruptive actions but won't stick around to be arrested any more. Over the past year a group called Shut the System (STS) has carried out a series of criminal attacks on the offices of finance and insurance companies: smashing windows, daubing paint, supergluing locks, and in January this year they targeted fibre optic communication cables. I spoke to one of the organisers on a messaging app. They argue the legal changes mean the traditional forms of accountable protest aren't viable anymore. It would be impossible for people to sustain an effective campaign with people going to prison for years after a single action,” the spokesperson told me. “Activists are forced into a position where we have to go underground. I asked the group what they would say to people who criticise them for breaking the law. They said that in their view the stakes are such that they have to do what they think works. This is not the first time protesters in the UK have taken clandestine action on climate issues. Over*

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<sup>31</sup> <https://www.theguardian.com/environment/2025/mar/27/just-stop-oil-hangs-up-the-hi-vis-after-three-years-of-climate-action> ; <https://www.theguardian.com/environment/2025/mar/08/a-new-phase-why-climate-activists-are-turning-to-sabotage-instead-of-protest> ; <https://www.theguardian.com/uk-news/2025/jan/24/man-arrested-after-climate-activists-cut-uk-insurance-firms-fibre-optic-cables> ;

<https://www.bbc.co.uk/news/articles/cz6denxzweeo>

<sup>32</sup> <https://novaramedia.com/2025/03/28/goodbye-to-just-stop-oil-or-is-it/>

<sup>33</sup> <https://www.theguardian.com/world/2025/apr/28/first-edition-just-stop-oil-legacy>

<sup>34</sup> <https://www.bbc.co.uk/news/articles/cz6denxzweeo>

*the past few years a group calling itself the Tyre Extinguishers has deflated tyres on sports utility vehicles (SUVs) in several locations, while this year another group drilled holes in the tyres of cars at a Land Rover dealership in Cornwall. The idea of protesters causing JSO levels of disruption - but unlike JSO, avoiding justice - may send a chill down the spine of many motorists. But Dr Graeme Hayes, reader in Political Sociology at Aston University, thinks only a tiny minority of climate campaigners are likely to get involved in such actions. He has studied environmental protest groups in the UK for decades and says the more radical groups are finding it increasingly hard to recruit people. "There is a very strong, profound ethical commitment to being non-violent within the climate movement so I think whatever it does will be based on those principles," he says. [...] It is in this context that Ms Lunnon of JSO believes new forms of disruptive protest will emerge in time. "The movement is there and will find new ways to confront the government," she says. "Nobody is shutting up shop and calling it a day. We know morally that we have to continue." However it is clear that, for now at least, the model that made JSO so notorious is dead."*

34. In the above-mentioned Times newspaper article, the authors wrote, *"Climate groups in Britain have a history of rising from the ashes of old ones, from Climate Camp and Plane Stupid in the Noughties to XR in the next decade and Insulate Britain, JSO, Youth Demand and the Tyre Extinguishers this decade. A group calling itself the Citizens Arrest Network undertook "citizen's arrests" of fossil fuel executives in London this month"*<sup>35</sup>. This pattern has recently been observed by other journalists also<sup>36</sup>. This pattern is illustrated in these TfL Claims, in which JSO emerged from IB and, after a short overlap period, effectively became its successor. The relationship between the two, and Extinction Rebellion also, was most recently explained in Abbey Ameen's witness statement dated 2 April 2023 for the JSO Trial at paragraphs 21-29.
35. I do not know if these new climate groups currently or in the future will count among their supporters JSO protesters, including Named Defendants in the TfL Claims. But these TfL Claims illustrate the overlap there can be in membership between different climate protest groups - in this case IB and JSO.

### *Youth Demand*

<sup>35</sup> <https://www.thetimes.com/uk/environment/article/just-stop-oil-news-jso-wrnn62jks> (paywall)

<sup>36</sup> <https://novaramedia.com/2025/03/28/goodbye-to-just-stop-oil-or-is-it/>

36. There is a group which formed at the beginning of 2024, Youth Demand, which is expressly linked with JSO and which was founded by some of its supporters<sup>37</sup>.
37. JSO and Youth Demand are both affiliated under an umbrella co-ordinating group called Umbrella<sup>38</sup>. The purpose is apparently for different groups to come together under Umbrella and to work together using different methods. On the one hand there exists a democracy project group called Assemble which is setting up parallel democratic institutions like ‘citizens assemblies’ and eventually a ‘House of the People’ to discuss public issues and come up with demands. On the other hand there exist groups like JSO and Youth Demand (which is described below) which can take action based on those demands. Umbrella also acts as a hub for fundraising, mobilising, and directing resources to new campaigns<sup>39</sup>.
38. Youth Demand demands that the government, “1) *Stop all trade with Israel: impose a total trade embargo on Israel, and 2) Make the rich pay: raise £1Tr by 2030 from the super rich and fossil fuel elite to pay damages to communities and countries harmed by fossil fuel burning.*”<sup>40</sup>. Its founding declaration in March 2024 demanded that both the Conservative and Labour parties commit to: “1. *Imposing an immediate two-way arms embargo on Israel, 2) Stopping the development of new oil and gas, including the licences granted since 2021.*”<sup>41</sup>
39. Youth Demand has and is continuing to engage in deliberately disruptive protests which bear a striking similarity to those previously engaged in by JSO.
40. Youth Demand’s supporters have done the following:

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<sup>37</sup> <https://www.theguardian.com/world/2024/apr/11/revolutions-are-coming-who-are-youth-demand-and-what-do-they-want> ; <https://juststopoil.org/2024/10/15/open-letter-just-stop-oil-and-youth-demand-tell-national-museum-directors-council-lets-meet/>

<sup>38</sup> <https://www.theguardian.com/world/2024/apr/11/revolutions-are-coming-who-are-youth-demand-and-what-do-they-want> ; <https://www.standard.co.uk/lifestyle/who-are-youth-demand-activist-just-stop-oil-b1219883.html> ; <https://communist.red/just-stop-oil-and-youth-demand-how-can-we-build-a-mass-movement/> ; [https://en.wikipedia.org/wiki/Just\\_Stop\\_Oil#2025](https://en.wikipedia.org/wiki/Just_Stop_Oil#2025) ; <https://www.independent.co.uk/news/uk/home-news/youth-demand-protest-quakers-b2724765.html>

<sup>39</sup> <https://bylinetimes.com/2025/03/28/just-stop-oil/> ; <https://juststopoil.org/2024/03/03/we-need-a-revolution-whats-the-plan/>

<sup>40</sup> <https://youthdemand.org>

<sup>41</sup> <https://youthdemand.org/2024/03/14/hello-world/>

- a. blocked roads with their physical presence, thereby obstructing motor traffic. Including the following roads/locations: Waterloo Bridge on 11 May 2024<sup>42</sup>; Oxford Circus on 22 June 2024<sup>43</sup>; Marble Arch on 13 June 2024; Tower Bridge on 19 October 2024 (along with other groups Prayers for Gaza, Pal Pulse, Thanet for Palestine and Ealing Friends of Palestine)<sup>44</sup>; Parkinson Steps and Headrow Briggate in Leeds on 12 November 2024<sup>45</sup>; Fairfield Road in Manchester on 13 November 2024<sup>46</sup>; Headrow/Briggate Junction in Leeds and roads in Cambridge on 14 November 2024<sup>47</sup>; Southampton Row, Marble Arch, and Kensington High Street in London and Prince of Wales Road, New North Road, and Heles Road in Exeter, all on 15 November 2024<sup>48</sup>; on roads in London, Manchester, Exeter, Leeds and Cambridge on 16 November 2024<sup>49</sup>; on numerous roads in the West End on 29 November 2024 (along with supporters of Palestine Pulse, XR for Palestine, Ealing Friends of Palestine, Prayers4Gaza, Thanet For Palestine, Prayers4Gaza, Seeds of Gaza, and Fight Racism Fight Imperialism)<sup>50</sup>; Euston Road near Kings Cross, Old Street Junction, Baker Street on 5 April 2025<sup>51</sup>; Kensington Gore near the Royal Albert Hall, Poultry near the Bank of England, Elephant and Castle, Holborn, and Vauxhall Bridge on 7 April 2025<sup>52</sup>; Buckingham Palace Road, Waterloo Road, and Holborn Circus on 10 April 2025<sup>53</sup>; Moorgate and Fenchurch Street on 11 April 2025<sup>54</sup>; Russell Square, Elephant and Castle, Hyde Park Corner,

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<sup>42</sup> <https://youthdemand.org/2024/05/11/stop-arming-israel-youth-demand-supporters-block-waterloo-bridge-as-rockets-rain-on-rafah/>

<sup>43</sup> <https://youthdemand.org/2024/06/22/hundreds-of-youth-demand-supporters-block-oxford-circus/>

<sup>44</sup> <https://youthdemand.org/2024/10/19/hundreds-shut-down-tower-bridge-against-israels-extinction-of-northern-gaza/>

<sup>45</sup> <https://youthdemand.org/2024/11/12/youth-demand-swarm-the-streets-in-leeds-on-second-day-of-national-action/>

<sup>46</sup> <https://youthdemand.org/2024/11/13/youth-demand-supporters-block-manchesters-roads-to-demand-israel-arms-embargo/>

<sup>47</sup> <https://youthdemand.org/2024/11/14/leeds-and-cambridge-roads-disrupted-by-youth-demand-supporters/>

<sup>48</sup> <https://youthdemand.org/2024/11/15/my-friends-in-gaza-are-all-under-siege-youth-demand-supporters-block-london-and-exeter/>

<sup>49</sup> <https://youthdemand.org/2024/11/16/youth-demand-supporters-shut-down-london-leeds-manchester-cambridge-and-exeter-in-co-ordinated-mass-action/>

<sup>50</sup> <https://youthdemand.org/2024/11/29/hundreds-shut-down-picadilly-circus-with-youth-demand-and-other-groups/>

<sup>51</sup> <https://youthdemand.org/2025/04/05/youth-demand-supporters-swarm-london/>

<sup>52</sup> <https://youthdemand.org/2025/04/07/youth-demand-supporters-swarm-london-again/>

<sup>53</sup> <https://youthdemand.org/2025/04/10/muslim-youth-demand-action-taker-knocked-out-suffers-multiple-seizure-on-fourth-day-of-london-swarms/>

<sup>54</sup> <https://youthdemand.org/2025/04/11/eggs-thrown-as-youth-demand-supporters-take-to-the-streets-to-demand-an-end-to-genocide/>

and Vauxhall Bridge north crossing on 12 April 2025<sup>55</sup>; Holborn, Southwark Bridge, Trafalgar Square, Tower Hill, Barbican, and Waterloo on 14 April 2025<sup>56</sup>; South Kensington, Victoria Street near Southwark Cathedral, Westminster Abbey, Warren Street, Piccadilly Circus on 15 April 2025<sup>57</sup>; the junction of St Pauls Churchyard and New Change just below Watling Street, the southern end of Waterloo Bridge (the ‘IMAX roundabout’) on 17 April 2025<sup>58</sup>; Waterloo, Holborn, a road near Bermondsey Station, and East India Dock Road in Limehouse on 18 April 2025<sup>59</sup>; Brunswick Square Gardens, the road at Aldgate East station, High Holborn, London Bridge’s southern crossing, Oxford Circus, and Waterloo Bridge on 19 April 2025<sup>60</sup>; Blackfriars Bridge and Elephant and Castle on 21 April 2025<sup>61</sup>; a road in Canary Wharf and Bishopsgate on 22 April 2025<sup>62</sup>; London Bridge south and Kennington Road on 24 April 2025<sup>63</sup>; .Eastcheap Road and Shoreditch High Street on 25 April 2025;

- b. spray painted multiple prominent governmental/political/public buildings<sup>64</sup>;
- c. disrupted multiple public meetings<sup>65</sup> and cultural/sporting events<sup>66</sup>. This includes the London Marathon as recently as 27 April 2025<sup>67</sup>;

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<sup>55</sup> <https://youthdemand.org/2025/04/12/youth-demand-supporters-take-to-the-streets-to-demand-arms-embargo/>

<sup>56</sup> <https://youthdemand.org/2025/04/14/shut-it-down-for-palestine-youth-demand-supporters-swarm-london-for-the-seventh-time-2/>

<sup>57</sup> <https://youthdemand.org/2025/04/15/youth-demand-supporters-assaulted-as-they-take-to-the-streets-to-demand-an-end-to-uks-governments-support-for-war-crimes/>

<sup>58</sup> <https://youthdemand.org/2025/04/17/youth-demand-swarm-london-again-and-again/>

<sup>59</sup> <https://youthdemand.org/2025/04/18/youth-demand-supporters-swarming-again-for-palestine/>

<sup>60</sup> <https://youthdemand.org/2025/04/19/youth-demand-take-to-the-streets-as-uk-continues-to-supply-weapons-to-kill-children/>

<sup>61</sup> <https://youthdemand.org/2025/04/21/youth-demand-supporters-shoved-by-vehicles-as-famine-in-gaza-deepens/>

<sup>62</sup> <https://youthdemand.org/2025/04/22/stop-the-genocide-youth-demand-swarms-in-the-city/>

<sup>63</sup> <https://youthdemand.org/2025/04/24/stop-arming-israel-youth-demand-supporters-disrupt-central-london/>

<sup>64</sup> <https://youthdemand.org/2024/04/08/youth-demand-an-end-to-genocide-by-painting-labour-party-hq/> ; <https://youthdemand.org/2024/04/10/youth-demand-and-palestine-action-paint-ministry-of-defence-and-march-through-london/> ; <https://youthdemand.org/2024/09/24/youth-demand-spray-genocide-conference-on-the-front-of-labour-party-conference/> ; <https://youthdemand.org/2025/02/06/im-enraged-that-ive-been-forced-into-complicity-with-the-killing-and-maiming-of-palestinian-children-glasgow-university-painted/>

<sup>65</sup> <https://youthdemand.org/2024/05/08/youth-demand-disrupt-peter-thiel-founder-of-tech-company-profiting-from-genocide/> ; <https://youthdemand.org/2024/05/21/youth-demand-and-climate-resistance-disrupt-david-lammy-speech-in-london/>

<sup>66</sup> <https://youthdemand.org/2024/10/17/youth-demand-supporters-invade-red-carpet-at-andrew-garfield-film-premiere/>

<sup>67</sup> <https://youthdemand.org/2025/04/27/gaza-is-running-out-of-food-stop-arming-israel-youth-demand-disrupt-london-marathon/>

- d. interfered with works of art housed in public galleries<sup>68</sup>;
- e. climbed on top of vehicles including the Labour Party's election 'battle bus'<sup>69</sup>;
- f. protested at/outside of MPs homes, including Keir Starmer's, then Prime Minister Rishi Sunak's, and David Lammy's<sup>70</sup>

**c) What JSO said and did between the first review hearing on 13 and 20 May 2024 and its 27 March 2025 Statement**

41. In order to focus on matters of most relevance, particularly given this is a review hearing not a full trial, I have not included in the below the numerous convictions of JSO protesters since the last review hearing. This is because many of those convictions relate to historic protesting activity covered in my second witness statement for that hearing or Abbey Ameen's witness statement dated 2 April 2023 for the JSO Trial.

**Airports**

42. In the summer of 2024, JSO undertook and attempted to undertake a "*summer of resistance at airports*". JSO described its campaign against air travel as its most "*radical action yet*"<sup>71</sup>. The resistance formed part of the 'Oil Kills international uprising' action taking place at airports around the world<sup>72</sup>
- a. on 20 June 2024, 2 JSO supporters, using fire extinguishers, spray painted two private jets at Stansted Airport with orange paint. The cost of cleaning was £52,000;<sup>73</sup>

<sup>68</sup> <https://youthdemand.org/2024/10/09/youth-demand-supporters-paste-bloodied-gazan-parent-and-child-onto-picassos-motherhood/>

<sup>69</sup> <https://youthdemand.org/2024/06/15/youth-demand-disrupt-labours-election-battle-bus/>

<sup>70</sup> <https://youthdemand.org/2024/04/09/youth-demand-keir-starmer-commits-to-ending-the-uks-support-for-murdering-children/> ; <https://youthdemand.org/2024/06/25/end-the-shitshow-youth-demand-makes-a-splash-at-rishi-sunaks-house/> ; <https://youthdemand.org/2025/04/08/lammy-stop-arming-genocide-youth-demand-supporters-lay-body-bags-at-david-lammys-door/>

<sup>71</sup> *Thurrock Council v Adams* [2024] EWHC 2576 (KB) at para. 25

<sup>72</sup> <https://www.bbc.co.uk/news/articles/cw4yq4dvydxo>

<sup>73</sup> <https://www.bbc.co.uk/news/articles/ce8d4d7910do> ; <https://news.sky.com/story/just-stop-oil-protest-two-women-charged-after-private-jets-sprayed-with-paint-at-stansted-airport-13156858>

- b. on 29 July 2024, 8 JSO supporters blocked the departure gates in the South Terminal in London Gatwick Airport<sup>74</sup>;
- c. On 30 July 2024, two JSO supporters, using fire extinguishers, spray painted the passenger information screens, the floor, windows, and walls at Heathrow Terminal 5 with orange paint. This apparently caused c.£50,000 worth of damage<sup>75</sup>.
- d. other planned protests were only prevented by pre-emptive arrests of JSO supporters<sup>76</sup> :
  - i. on 24 July 2024 around 10 other JSO supporters (found with glue and angle grinders on their persons) sought to trespass onto Heathrow Airport, with the Crown arguing in their successful prosecution of these supporters for conspiracy to commit public nuisance that their intention was to glue themselves to taxiways<sup>77</sup> and runways<sup>78</sup>. The police said if successful the protest would have disrupted the flights of 260,000 passengers<sup>79</sup>;
  - ii. on 5 August 2024, 4 JSO supporters planned to access Manchester Airport via its perimeter fence and then 3 would glue themselves onto the taxiway<sup>80</sup>;

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<sup>74</sup> <https://www.bbc.co.uk/news/articles/cw4yq4dvdydxo> ;  
<https://www.thetelegraphandargus.co.uk/news/24482120.london-gatwick-bradford-people-just-stop-oil-protest/> ;  
<https://www.standard.co.uk/news/london/just-stop-oil-gatwick-airport-protesters-departure-b1173388.html>

<sup>75</sup> <https://juststopoil.org/2024/07/31/phoebe-plummer-and-jane-touil-imprisoned/> ;  
<https://news.sky.com/story/two-just-stop-oil-protesters-arrested-at-heathrow-as-activists-stage-second-airport-protest-in-a-week-13187284>

<sup>76</sup> <https://juststopoil.org/2024/10/02/two-just-stop-oil-supporters-acquitted-after-glueing-to-turner-masterpiece/>;  
<sup>77</sup> <https://news.sky.com/story/nine-just-stop-oil-protesters-convicted-after-planning-to-glue-themselves-to-heathrow-runway-13332660>

<sup>78</sup> <https://juststopoil.org/2025/03/20/heathrow-airport-10-8-found-guilty-1-acquitted-after-judge-removed-all-legal-defences/>

<sup>79</sup> <https://news.sky.com/story/nine-just-stop-oil-protesters-convicted-after-planning-to-glue-themselves-to-heathrow-runway-13332660>

<sup>80</sup> <https://juststopoil.org/2024/08/06/five-more-just-stop-oil-supporters-remanded-to-prison-as-total-incarcerated-for-climate-action-rises-to-26/> ; <https://juststopoil.org/2025/02/21/manchester-airport-five-one-acquitted-four-found-guilty-after-acting-to-prevent-mass-death/> ; <https://juststopoil.org/2025/04/16/writing-from-hmp-styal/> ; <https://www.gmp.police.uk/news/greater-manchester/news/news/2025/february/four-just-stop-oil-protestors-found-guilty-after-gmp-foil-disruption-activity-plans-close-to-manchester-airport/>

- e. the threat posed by JSO supporters to airports led to urgent newcomer injunctions being granted to protect the following airports against their protesting activity:
  - i. London City Airport on 20 June 2024 (*London City Airport Ltd v Persons Unknown* [2024] EWHC 2557 (KB);
  - ii. Heathrow Airport on 9 July 2024 (*Heathrow Airport Ltd v Persons Unknown* [2024] EWHC 2599 (KB);
  - iii. Gatwick Airport in July<sup>81</sup>;
  - iv. Manchester Airport, Stansted Airport, and East Midlands Airport on 24 July 2024 (*Manchester Airport PLC & Ors v Persons Unknown* [2024] EWHC 2247 (KB);
  - v. Leeds Bradford Airport, London Luton Airport, and Newcastle International Airport in late July 2024 (*Leeds Bradford Airport Ltd & Ors v Persons Unknown* [2024] EWHC 2274 (KB).

#### Other protests and statements

43. On 19 June 2024, JSO supporters, with fire extinguishers, spray painted Stonehenge with orange powder paint<sup>82</sup>.
44. On 10 July 2024, a JSO supporter released a large amount of orange paint on the carriageway in Parliament Square, in celebration of the Government's commitment to end all new licences for fossil fuel extraction.<sup>83</sup>
45. Also on 10 July 2024, JSO said, "*Until leaders act to protect us, Just Stop Oil supporters will continue to take the proportional action necessary to generate political pressure. This summer, airports will be declared sites of civil resistance. Sign up to take action at juststopoil.org.*"<sup>84</sup>

<sup>81</sup> <https://www.bbc.co.uk/news/articles/cw4yq4dvydxo>

<sup>82</sup> <https://juststopoil.org/2024/06/19/its-time-for-megalithic-action-just-stop-oil-decorate-stonehenge/>

<sup>83</sup> <https://news.sky.com/video/just-stop-oil-activists-paint-parliament-square-orange-in-latest-protest-13176147>

<sup>84</sup> <https://juststopoil.org/2024/07/10/world-snooker-championships-disruptors-sentenced/>

46. On 25 July 2024, JSO said, *“As long as political leaders fail to take swift and decisive action to protect our communities from the worst effects of climate breakdown, Just Stop Oil supporters, working with other groups internationally, will take the proportionate action necessary to generate much needed political pressure. This summer, areas of key importance to the fossil fuel economy will be declared sites of civil resistance around the world. Are you in? Sign up to take action at juststopoil.org.”*<sup>85</sup>
47. On 31 July 2024, JSO made the same statement as on 25 July quoted above<sup>86</sup>.
48. On 1 August 2024, JSO said, *“Until leaders act to protect us, Just Stop Oil supporters will continue to take the proportional action necessary to generate political pressure.”*<sup>87</sup>
49. On 6 August 2024, JSO said, *““In the wake of the four hottest days in recorded history during the past two weeks, governments are still failing to take action that is commensurate with the scale of the crisis humanity faces. Meanwhile, those demanding our leaders take necessary action, are being given increasingly draconian sentences by those in the judiciary who are complicit with the crimes against humanity, being perpetrated by governments and corporations. It’s time world leaders stood up to fossil capital and enact a fossil fuel treaty to Just Stop Oil by 2030.”*<sup>88</sup>
50. On 1 October 2024, a JSO supporter (Named Defendant 82 in the TfL JSO Claim), having been convicted of wilful obstruction of the highway on 6 November 2023, shouted at Deputy District Judge Patricia Evans: *“What you have done is shameful. How do you live with yourself? “It is shameful, all of you - you are criminalising people who are fighting for your futures. Shame on you, judge”*. She then stormed out of court.<sup>89</sup>

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<sup>85</sup> <https://juststopoil.org/2024/07/25/eight-just-stop-oil-supporters-imprisoned-as-the-oil-kills-international-uprising-to-end-fossil-fuels-continues/>

<sup>86</sup> <https://juststopoil.org/2024/07/31/phoebe-plummer-and-jane-touil-imprisoned/>

<sup>87</sup> <https://juststopoil.org/2024/08/01/gantry-climbers-sentenced-two-years-in-prison/>

<sup>88</sup> <https://juststopoil.org/2024/08/06/five-more-just-stop-oil-supporters-remanded-to-prison-as-total-incarcerated-for-climate-action-rises-to-26/>

<sup>89</sup> <https://www.bbc.co.uk/news/articles/c9dyx6y2vjzo>

51. On 19 November 2024, JSO supporters marched along Whitehall in London along with the Farmers' March called by the NFU<sup>90</sup>.
52. On 13 January 2025, JSO supporters, using chalk paint, spray painted the grave of Charles Darwin in Westminster Abbey with the message, '1.5 [degrees Celsius] IS DEAD' <sup>91</sup>
53. On 27 January 2025, JSO supporters disrupted a performance of The Tempest, starring Sigourney Weaver, by climbing onto the stage during the play at Theatre Royal Drury Lane<sup>92</sup>.
54. On 30 January 2025, over 1000 protesters including JSO supporters blocked, by sitting down in the road, the Strand outside the Royal Courts of Justice. The protesters were protesting in support of JSO protesters whose appeals against convictions were being heard in the Court of Appeal that day<sup>93</sup>.
55. Also on 30 January 2025. JSO said, *"In 2024 Just Stop Oil successfully won its original demand of 'no new oil and gas' a victory that was cemented by the judgement in a Scottish court today that declared the development consents for the Jackdaw and Rosebank oil fields to be unlawful. Non-violent civil resistance works. Just Stop Oil will once again be stepping into action this April to demand that the UK government commits to an international treaty to phase out the extraction and burning of oil, gas and coal by 2030."*<sup>94</sup>
56. On 3 February 2025, Mrs Justice Hill DBE maintained the 5-year injunction granted to Valero Energy Ltd against Persons Unknown defined by reference to, among other groups, IB and JSO<sup>95</sup>. The court at paragraphs 30-34 found a continuing threat from these groups to Valero's property and operations.

<sup>90</sup> <https://juststopoil.org/2024/11/19/just-stop-oil-join-farmers-protest/>

<sup>91</sup> <https://www.bbc.co.uk/news/articles/cjw40zl6dllo>

<sup>92</sup> <https://www.bbc.co.uk/news/articles/c1kmwp0l997o>

<sup>93</sup> <https://juststopoil.org/2025/01/30/over-1000-people-block-the-strand-outside-the-mass-appeal-hearing-for-16-just-stop-oil-supporters/> ; <https://www.bbc.co.uk/news/articles/cx2k5nll23xo>

<sup>94</sup> <https://juststopoil.org/2025/01/30/three-just-stop-oil-supporters-found-guilty-for-treasury-paint-action-carried-out-in-response-to-jackdaw-consent/> ; <https://juststopoil.org/2025/01/30/over-1000-people-block-the-strand-outside-the-mass-appeal-hearing-for-16-just-stop-oil-supporters/>

<sup>95</sup> *Valero Energy Ltd v Persons Unknown & Ors* [2025] EWHC 207 (KB)

57. On 13, 17, 21 February, 20 March 2025, JSO made the same statement as on 30 January quoted above<sup>96</sup>.
58. On 7 March 2025 JSO said as follows, “*“The British Courts have been captured, lock, stock and barrel by the powerful, by the ultra wealthy, by those who can not see beyond business as usual. These Judges would be sending those who hid Anne Frank to the cattle trucks while hiding behind ‘the rule of law’”*”<sup>97</sup>.
59. On 12 March 2025, 2 JSO supporters poured orange liquid latex over an Optimus robot at the Westfield Tesla store in London<sup>98</sup>.

#### **d) TfL’s position in this second review hearing in light of the above**

60. TfL welcomes the 27 March Statement.
61. If JSO and its supporters keep to it, then the Final Injunctions will not be necessary for the full balance of its duration (3 of 5 years are left).
62. However, in this second review hearing, TfL’s position is that it seeks the maintenance of the Final Injunctions for up to 1 year. If IB and JSO show for a longer period than just 6 weeks (since 27 March 2025) that they will keep to their Statement, TfL would not oppose discharge of the injunction at the next review hearing.
63. The reasons for this position are contained in TfL’s skeleton argument for this second review hearing and summarised below.
64. In short - given JSO/IB’s long history of deliberate disruption on roads and otherwise, their numerous statements saying that they will never desist until all their

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<sup>96</sup> <https://juststopoil.org/2025/02/13/just-stop-oil-supporter-found-guilty-after-spraying-orange-paint-over-kings-college-cambridge/> ; <https://juststopoil.org/2025/02/17/three-just-stop-oil-supporters-found-guilty-for-breaching-illegally-introduced-anti-protest-regulations/> ; <https://juststopoil.org/2025/02/21/manchester-airport-five-one-acquitted-four-found-guilty-after-acting-to-prevent-mass-death/> ; <https://juststopoil.org/2025/03/20/heathrow-airport-10-8-found-guilty-1-acquitted-after-judge-removed-all-legal-defences/>

<sup>97</sup> <https://juststopoil.org/2025/03/07/appeal-court-fails-to-protect-citizens/>

<sup>98</sup> <https://juststopoil.org/2025/03/12/shut-down-the-fascists-just-stop-oil-supporters-turn-the-teslabot-orange/> ; <https://www.standard.co.uk/news/london/just-stop-oil-protest-elon-musk-tesla-london-b1216210.html>

demands are met, and their flagrant disregard for the law, courts, and judiciary - my colleagues at TfL and I still sincerely fear disruption by JSO/IB to a highly strategically important protected roads in London, causing the type of considerable harm to the public, TfL, police, and the courts which have repeatedly been accepted by this Court.

65. The Final Injunctions, like their interim predecessors, have consistently been found by the Court to be effective in protecting these roads, whose strategic importance has also been repeatedly accepted by the Court.

### **Conclusion**

66. I set out above TfL's position in this second review hearing. I also set out important factual matters, including those which fall within TfL's duty to give full and frank disclosure.

### **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 made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:



Name: CARL EDDLESTON

Dated: 6 May 2025

**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

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

Claimant

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

Claim No. KB-2022-003542

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) 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, A5201 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**

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**JUDGMENT ORDER**

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**UPON** yearly review hearings having been ordered in respect of the Final Injunctions made in the above Claims, so long as those injunctions remain in force. Herein, Claim Nos. QB-2021-003841 and QB-2021-004122 and the final injunction made therein are referred to as the “**TfL IB Claims**” and the “**IB Final Injunction**” respectively and Claim No. KB-2022-003542 and the final injunction made therein are referred to as the “**TfL JSO Claim**” and the “**JSO Final Injunction**” respectively

**AND UPON** an application dated 27 July 2023 (“**the Lewis Application**”) having been made in the TfL IB Claims 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**”), to i) discharge the IB Final Injunction as against each of them in return for each giving a written undertaking to the Court promising not to do the prohibited conduct on roads/locations specified therein, and ii) remove their costs liability in the TfL IB Claims imposed by the Judgment Order of Morris J made on 3 May 2023

**AND UPON** the Claimant not opposing part i) of the Lewis Application above

**AND UPON** the Court considering both before and after that hearing the documents filed for the purposes of the review hearing and Lewis Application

**AND UPON** hearing counsel for the Claimant, Andrew Fraser-Urquhart KC and Charles Forrest, the then counsel for the Named Defendants listed in Annex B to the review hearing judgment, Stephen Simblet KC, Indigo Rumbelow in person (Named Defendant 114 in the TfL IB Claims and Named Defendant 50 in the TfL JSO Claim), and Mr Matthew Parry in person (Named Defendant 143 in the TfL JSO Claim)

**AND UPON** the Court having accepted the above-mentioned written undertakings from those Named Defendants

**IT IS ORDERED THAT:**

1. The IB Final Injunction is discharged as against the Named Defendants listed in Annex A to the review hearing judgment. An updated IB Final Injunction is the subject of a separate Order.
2. For the avoidance of doubt the JSO Final Injunction remains unchanged.
3. Part ii) of the Lewis Application above, relating to costs liability in the TfL IB Claims, is dismissed.
4. No Order as to costs in respect of the Lewis Application.
5. No Order as to costs in respect of the review hearing.
6. 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](mailto:ring2021@protonmail.com) and [insulatebritainlegal@protonmail.com](mailto:insulatebritainlegal@protonmail.com);
    - ii. Just Stop Oil's email addresses: [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com) and [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com);
    - iii. Extinction Rebellion's email address: [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk);
    - iv. Animal Rebellion email addresses: [actions@animalrebellion.org](mailto:actions@animalrebellion.org), [fundraising@animalrebellion.org](mailto:fundraising@animalrebellion.org), [integration@animalrebellion.org](mailto:integration@animalrebellion.org), [talks@animalrebellion.org](mailto:talks@animalrebellion.org), [global@animalrebellion.org](mailto:global@animalrebellion.org), [localgroups@animalrebellion.org](mailto:localgroups@animalrebellion.org), [media@animalrebellion.org](mailto:media@animalrebellion.org), [governance@animalrebellion.org](mailto:governance@animalrebellion.org), [pressoffice@animalrebellion.org](mailto:pressoffice@animalrebellion.org), [finance@animalrebellion.org](mailto:finance@animalrebellion.org) and [techsupport@animalrebellion.org](mailto: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.
7. For the avoidance of doubt, compliance with paragraph 6 shall not constitute service.

#### **Communications with the Claimant**

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

**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

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**FINAL INJUNCTION ORDER**

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**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](mailto:ring2021@protonmail.com) and [insulatebritainlegal@protonmail.com](mailto:insulatebritainlegal@protonmail.com);
    - ii. Just Stop Oil’s email addresses: [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com) and [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com);
    - iii. Extinction Rebellion’s email address: [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk);
    - iv. Animal Rebellion email addresses: [actions@animalrebellion.org](mailto:actions@animalrebellion.org), [fundraising@animalrebellion.org](mailto:fundraising@animalrebellion.org), [integration@animalrebellion.org](mailto:integration@animalrebellion.org), [talks@animalrebellion.org](mailto:talks@animalrebellion.org), [global@animalrebellion.org](mailto:global@animalrebellion.org), [localgroups@animalrebellion.org](mailto:localgroups@animalrebellion.org), [media@animalrebellion.org](mailto:media@animalrebellion.org), [governance@animalrebellion.org](mailto:governance@animalrebellion.org), [pressoffice@animalrebellion.org](mailto:pressoffice@animalrebellion.org), [finance@animalrebellion.org](mailto:finance@animalrebellion.org) and [techsupport@animalrebellion.org](mailto: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, 4<sup>th</sup> Floor, Stratford, Yellow Zone,  
Stratford, E20 1JN  
Tel: 02030547921

**BY THE COURT**

**The Honourable Mr Justice Morris**

Dated: 4 February 2025

**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 MADE ON 4 FEBRUARY 2025**

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| 53 | Karen WILDIN    | ████████████████████████████████████████ |

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| 54 | Liam NORTON                   | ████████████████████████████████████████<br>████ |
| 55 | Louis MCKECHNIE               | ████████████████████████████████████████         |
| 56 | Louise Charlotte<br>LANCASTER | ████████████████████████████████████████         |
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| 77 | Paul SHEEKY | ████████████████████████████████████████<br>████████████████████████████████████ |
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| 94  | Stephanie AYLETT  |  |
| 95  | Stephen GOWER     |  |
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| 103 | Tessa-Marie BURNS |  |
| 104 | Theresa NORTON    |  |
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| 107 | Tracey MALLAGHAN  |  |
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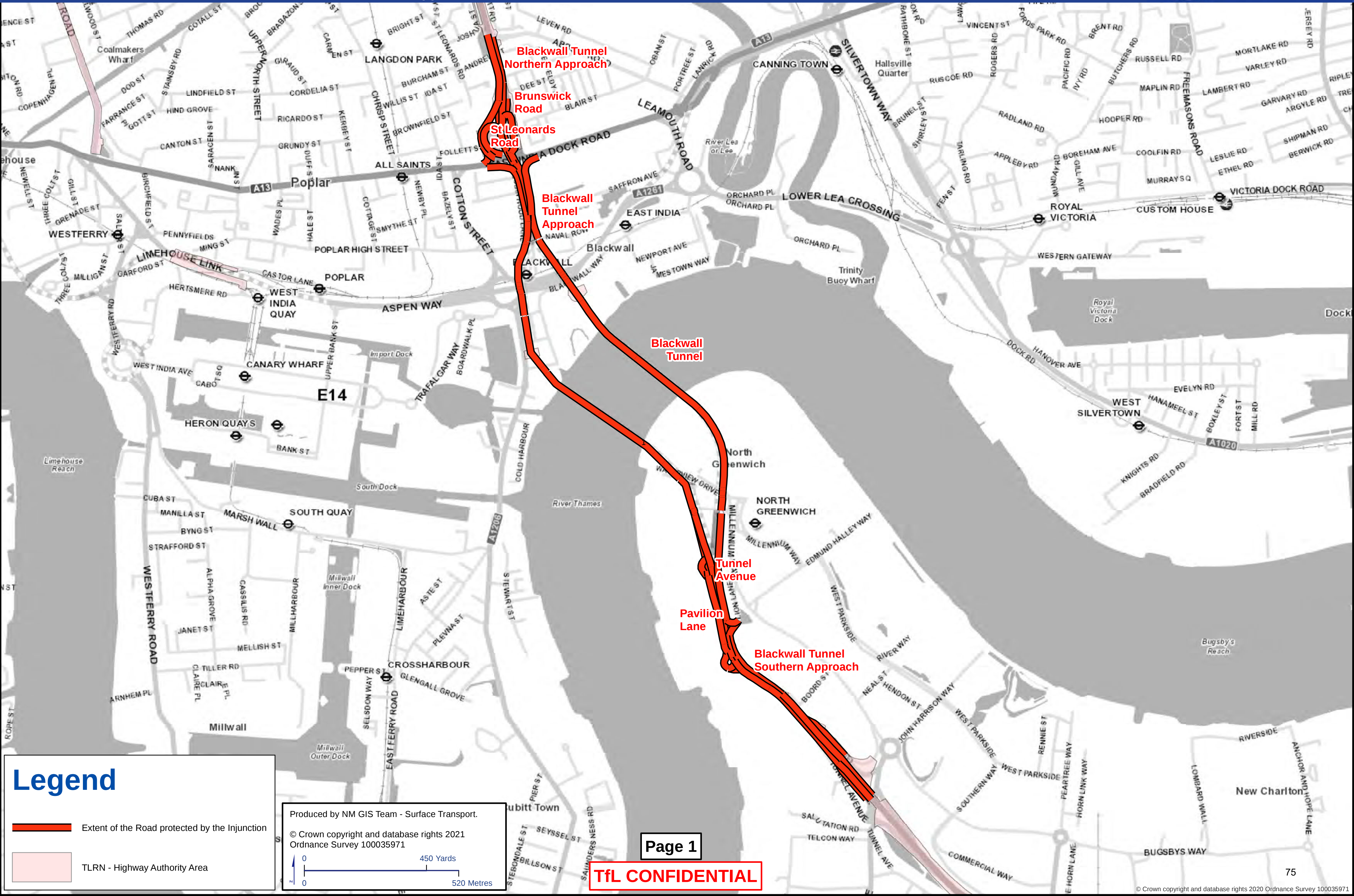
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# Climate Protest Injunction - Key Areas

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

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



## Legend

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

Produced by NM GIS Team - Surface Transport.

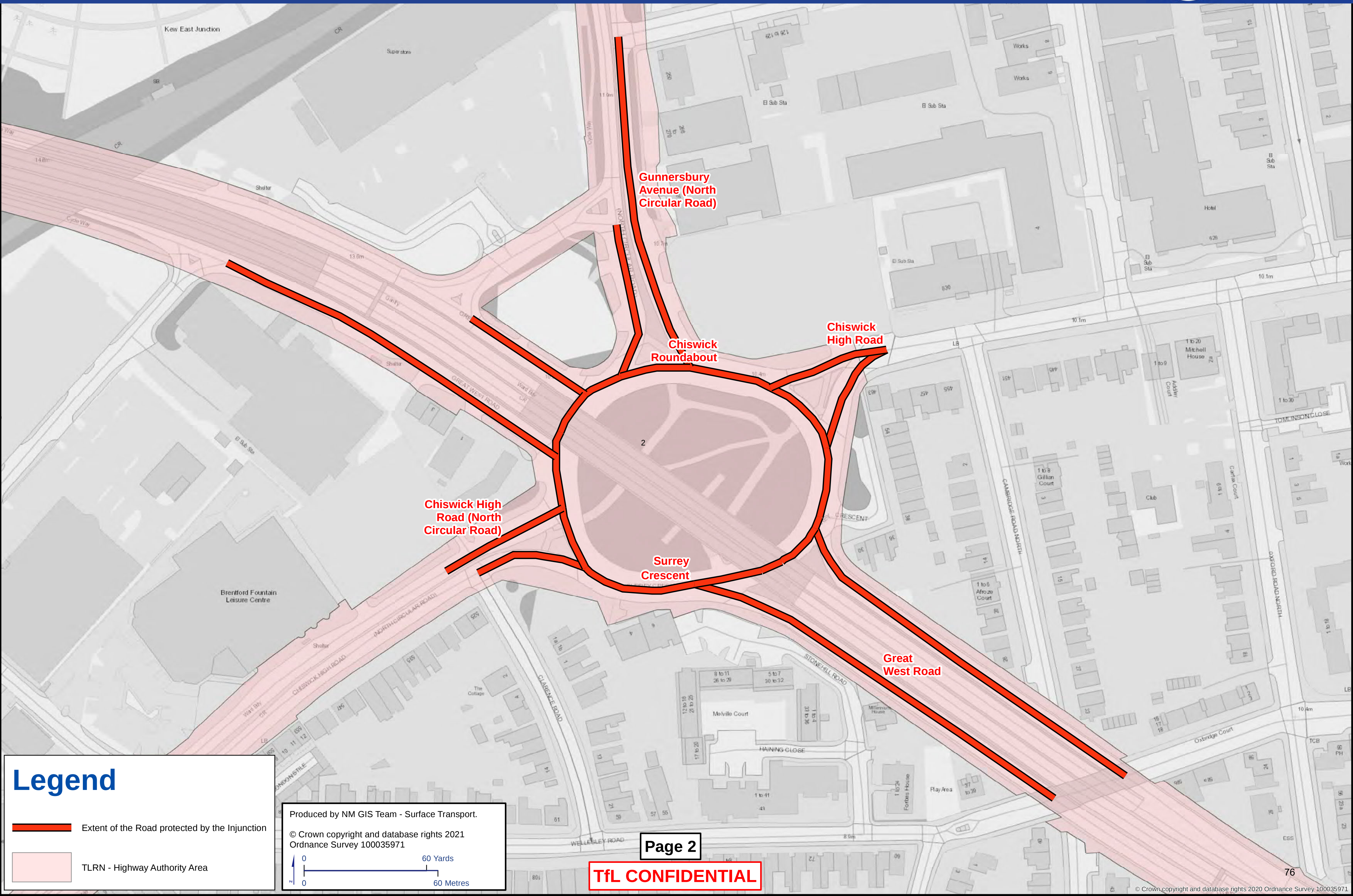
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0 450 Yards  
0 520 Metres

# Climate Protest Injunction - Key Areas

Information as of 21 June 2022 - Chiswick Roundabout



## Legend

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

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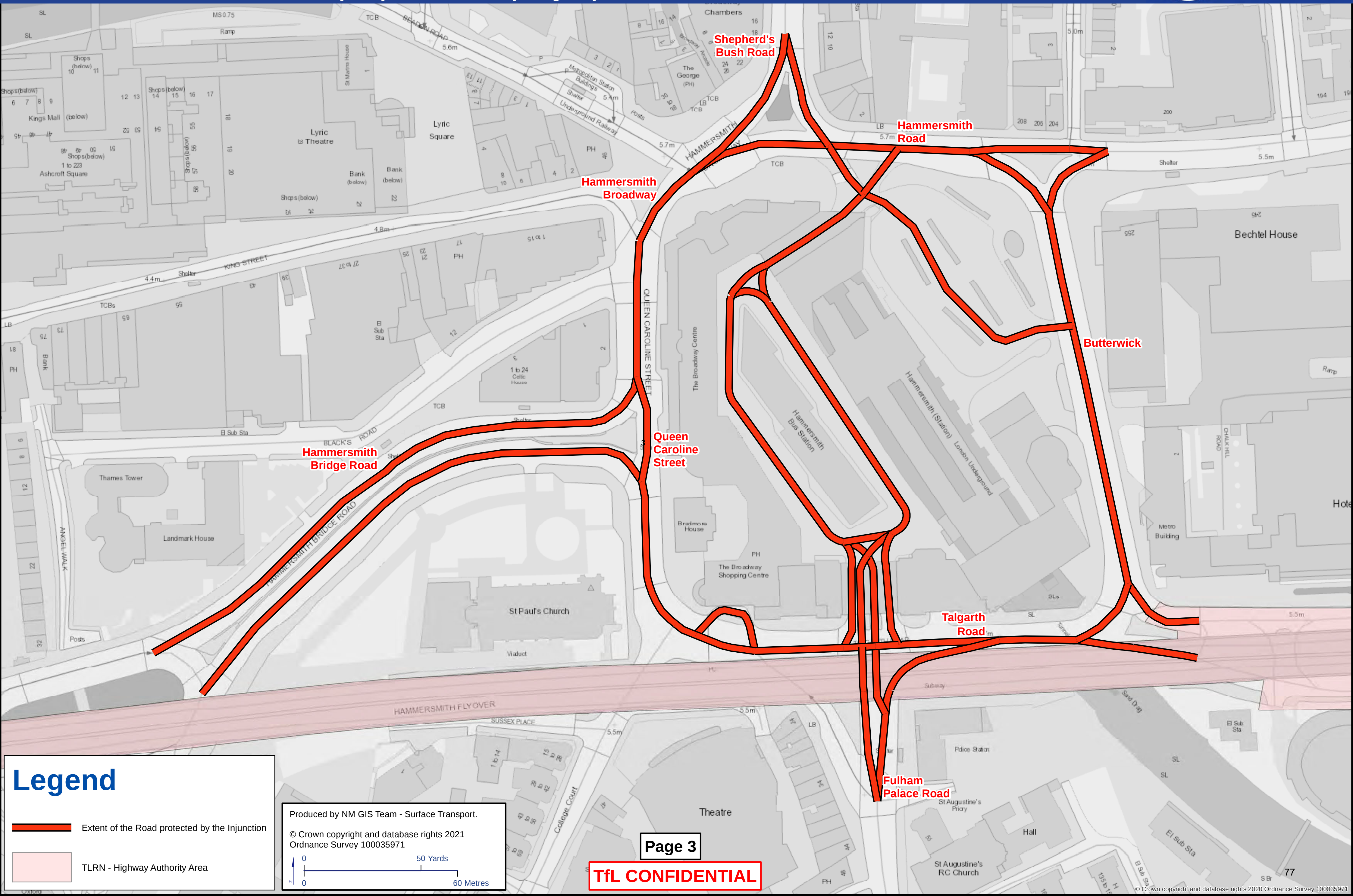
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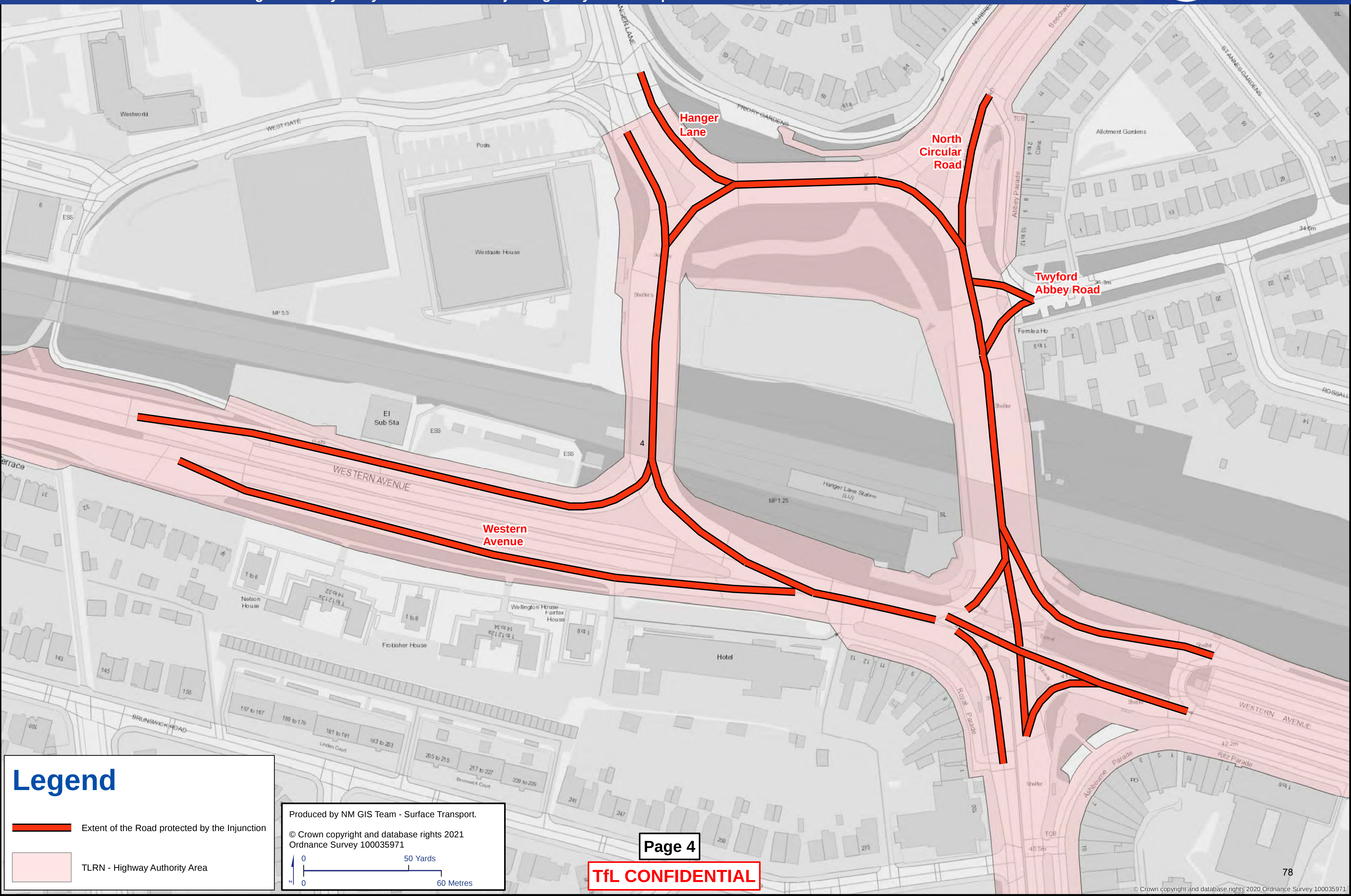
# Climate Protest Injunction - Key Areas

Information as of 21 June 2022 - Hammersmith Gyration 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



## Legend

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

Produced by NM GIS Team - Surface Transport.

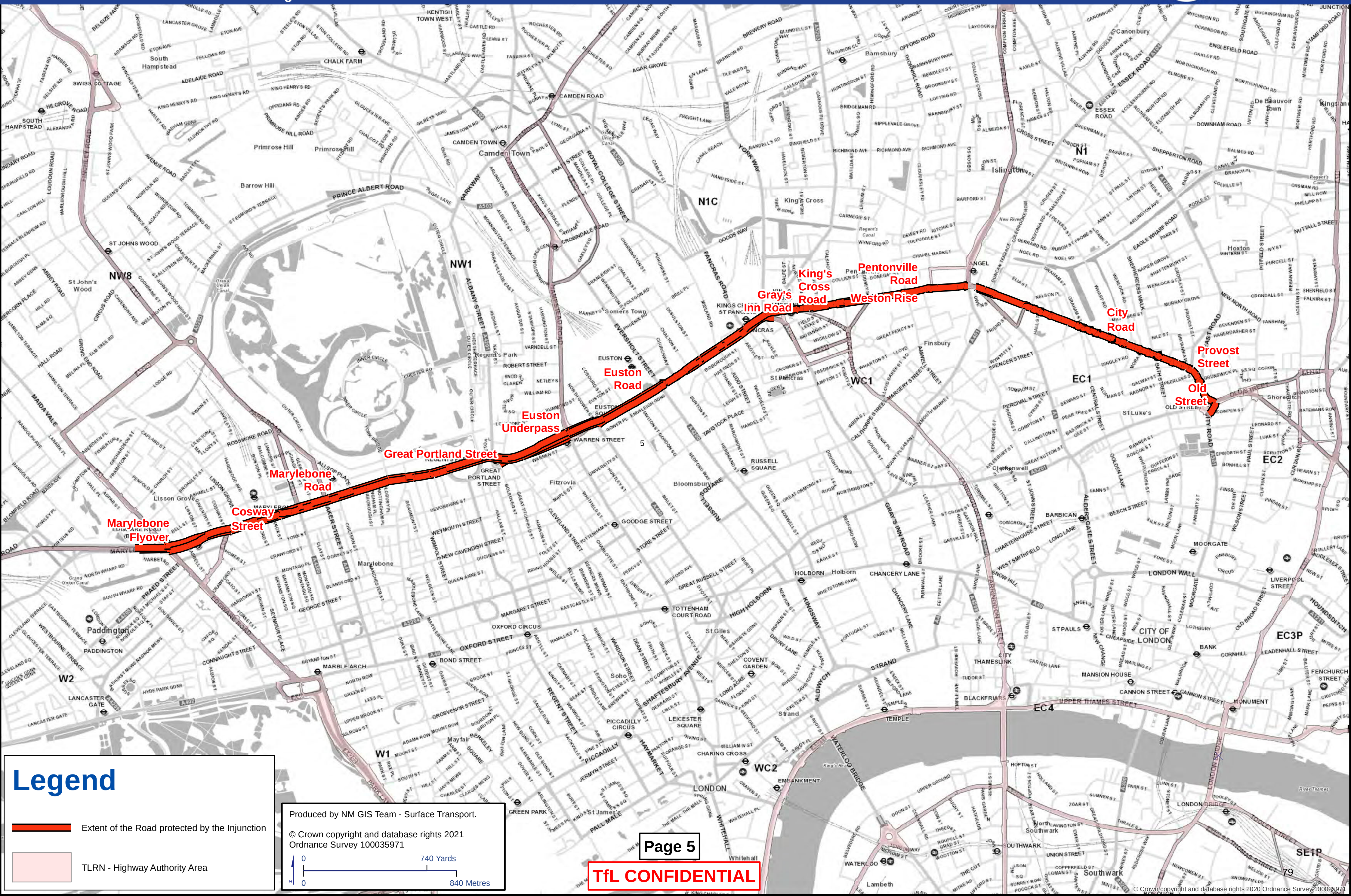
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0 50 Yards  
0 60 Metres

# Climate Protest Injunction - Key Areas

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



## Legend

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

Produced by NM GIS Team - Surface Transport.

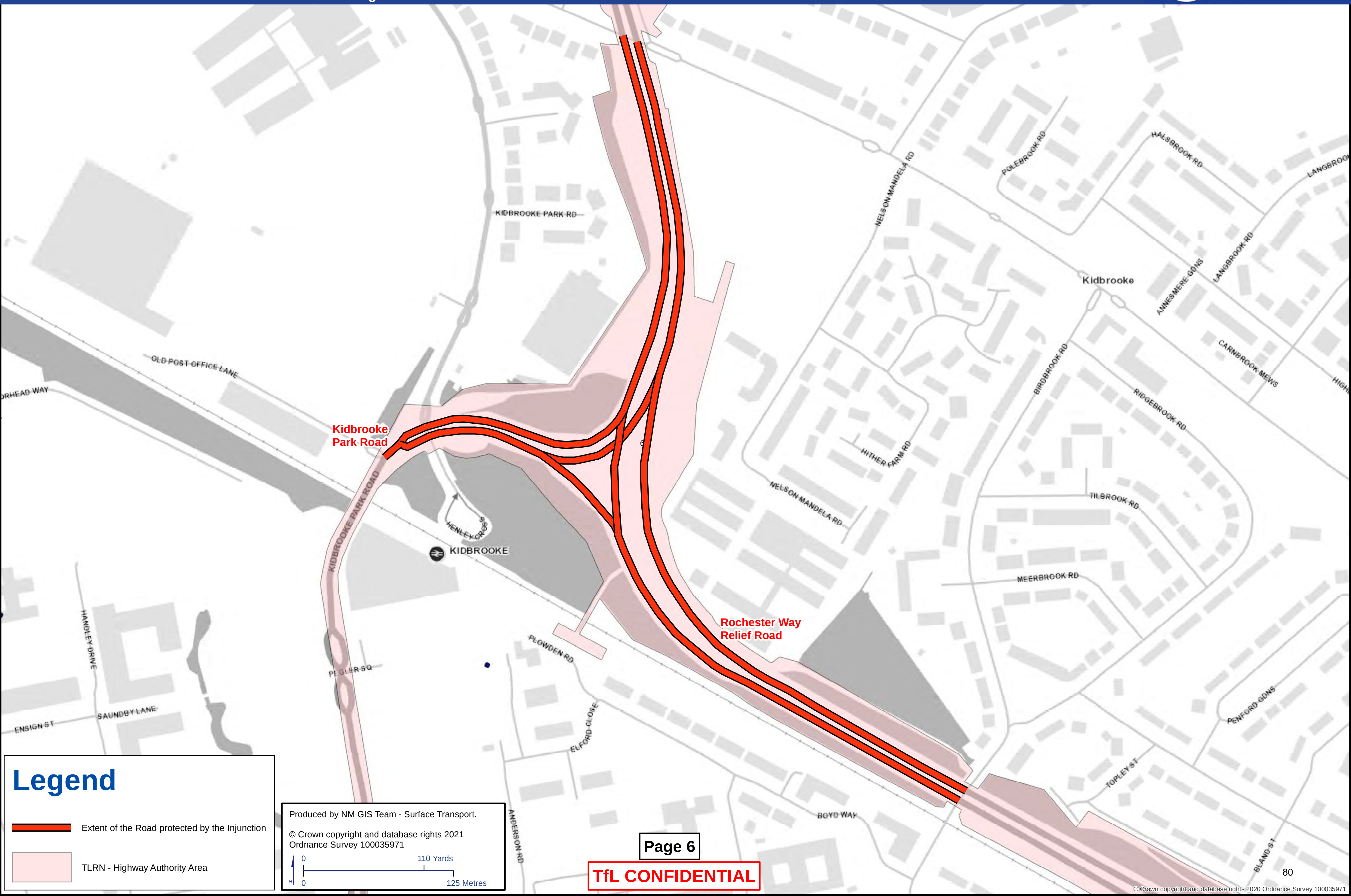
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0 740 Yards  
0 840 Metres

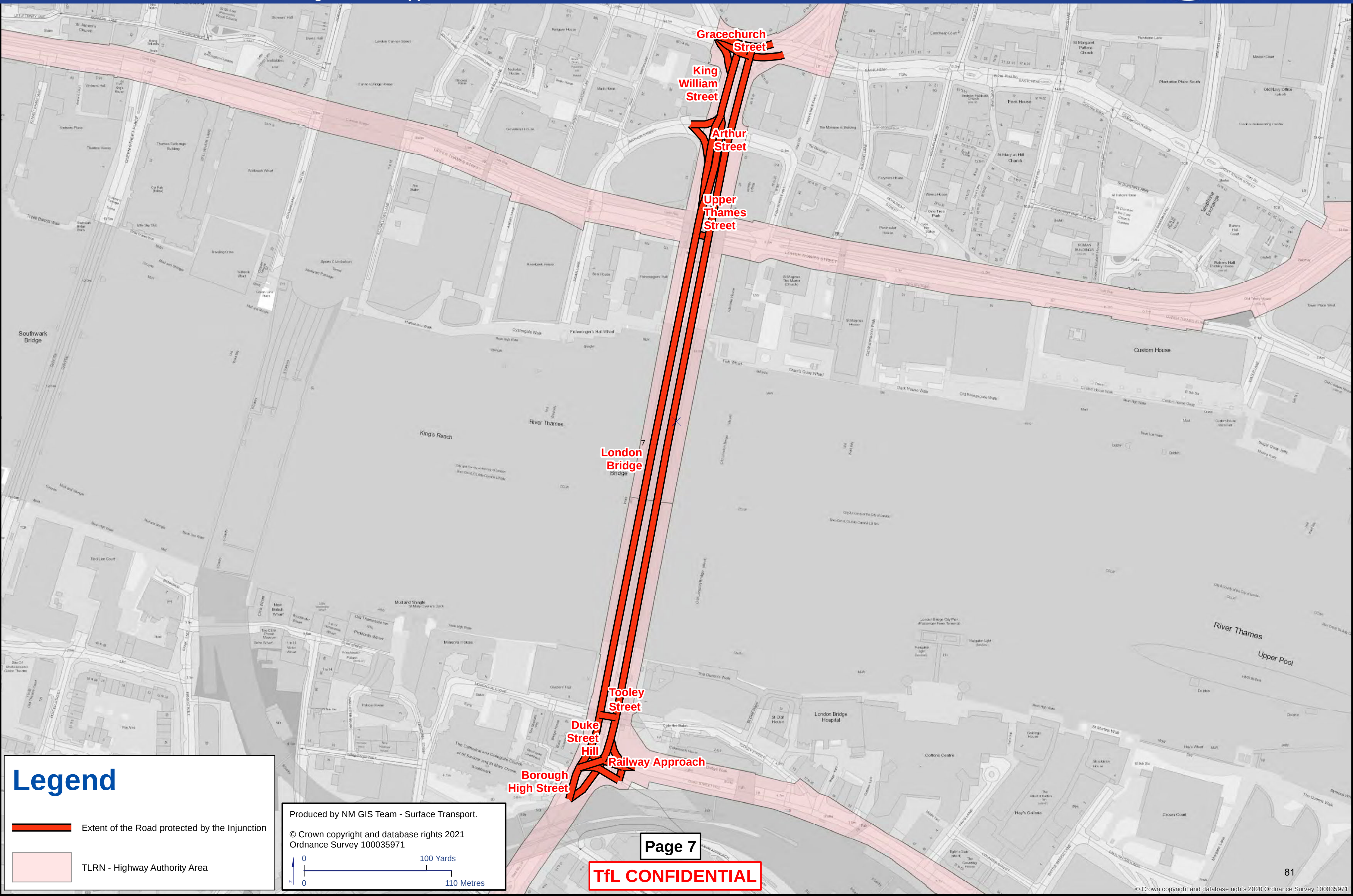
# Climate Protest Injunction - Key Areas

Information as of 21 June 2022 - Kidbrooke Interchange



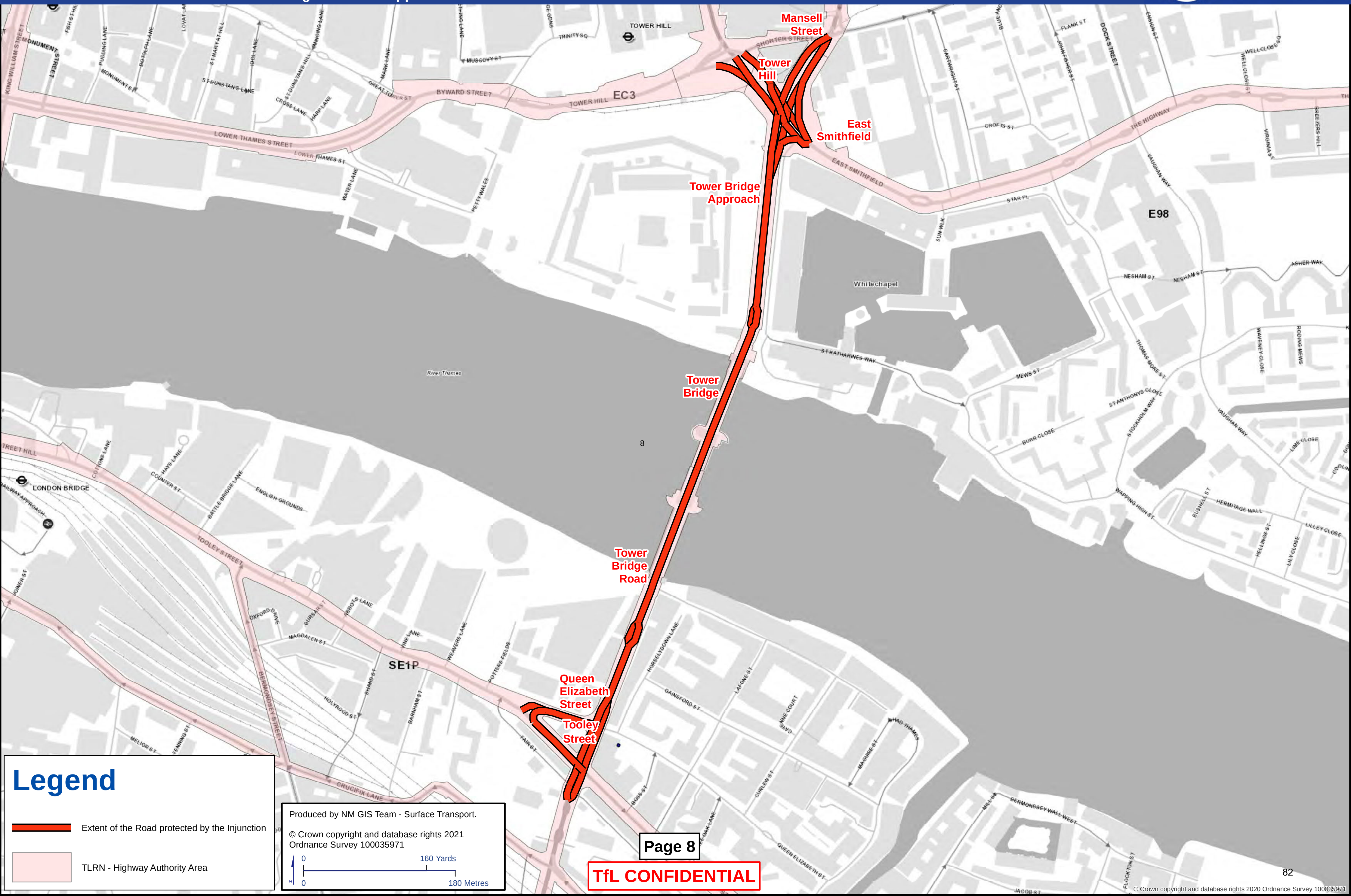
# Climate Protest Injunction - Key Areas

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



# Climate Protest Injunction - Key Areas

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



## Legend

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

Produced by NM GIS Team - Surface Transport.

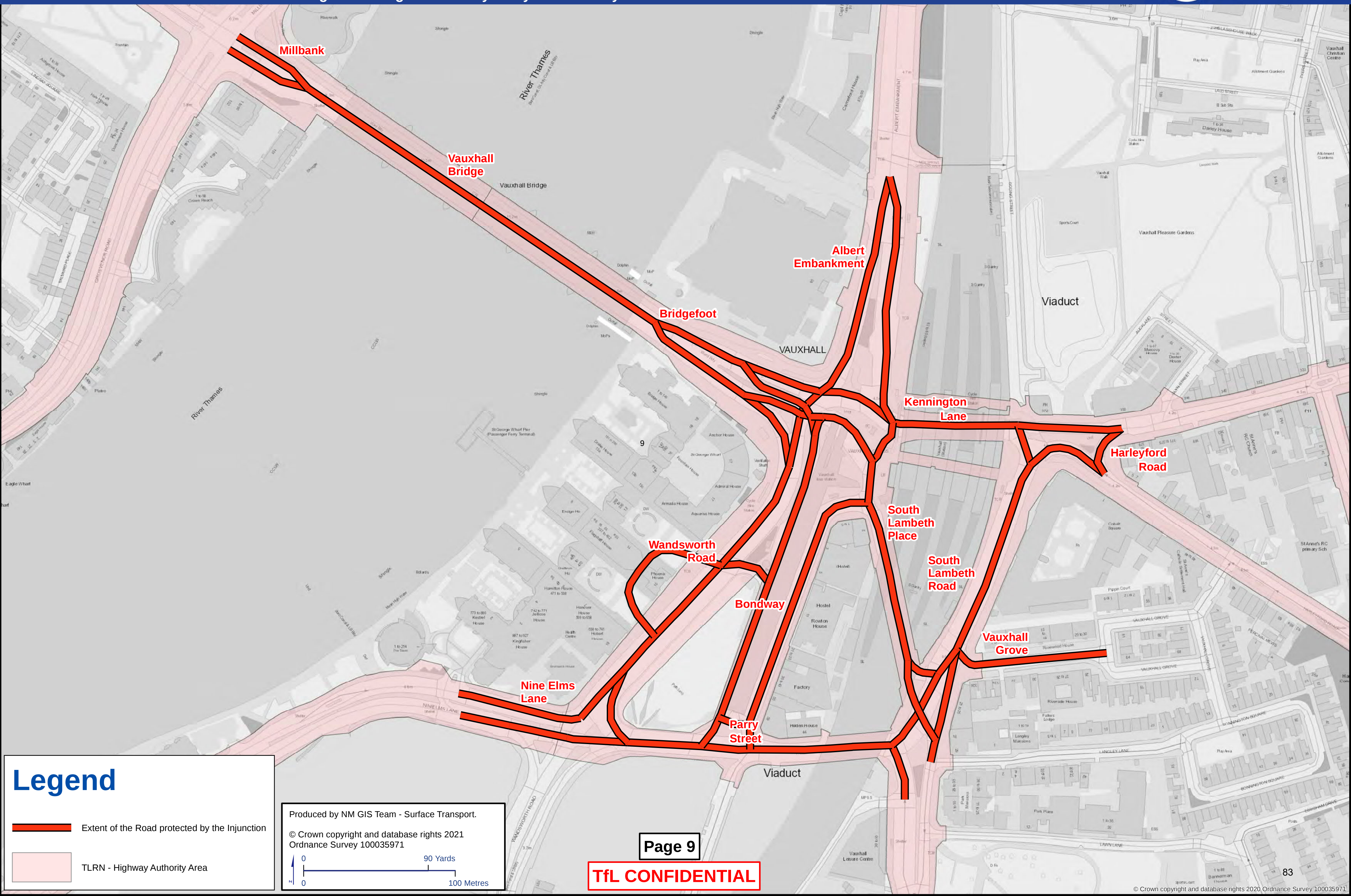
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0 160 Yards  
0 180 Metres

# Climate Protest Injunction - Key Areas

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



## Legend

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

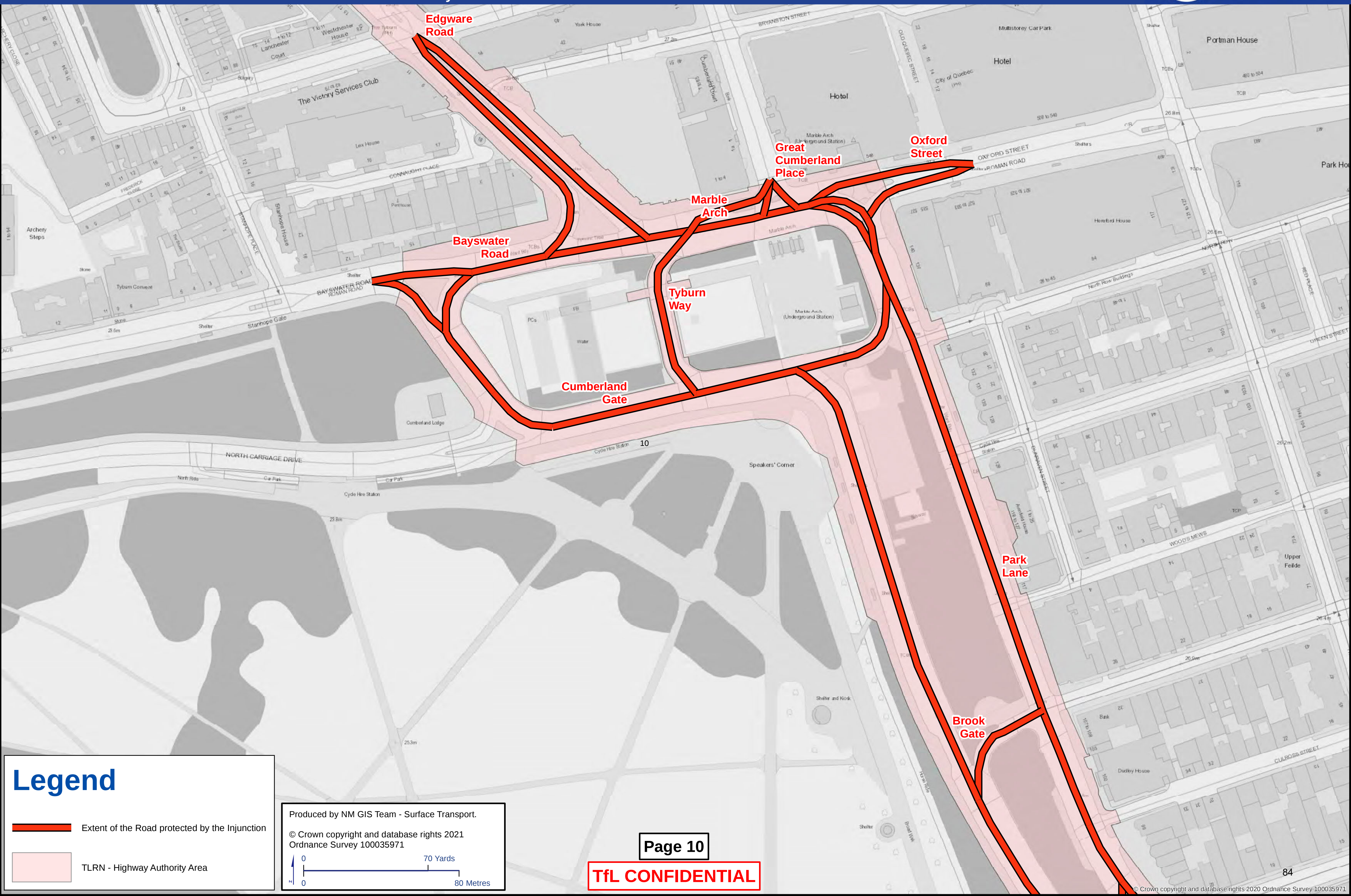
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# Climate Protest Injunction - Key Areas

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



## Legend

Extent of the Road protected by the Injunction

TLRN - Highway Authority Area

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0

70 Yards

80 Metres



**Legend**

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

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0 240 Yards  
 0 275 Metres

Page 11

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 TLRN - Highway Authority Area

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