

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim no. QB-2021-003841

Before: The Honourable Mr Justice Martin Spencer
On: 4 April 2022

B E T W E E N:

TRANSPORT FOR LONDON

-and-

(1) PERSONS UNKNOWN DELIBERATELY CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE 1) 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 PURPOSES 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



ORDER

PENAL NOTICE

IF YOU THE WITHIN 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 hearing Andrew Fraser-Urquhart QC and Charles Forrest, Counsel for the Claimant, **AND UPON** there being no appearance by or on behalf of the Defendants **AND UPON** Ms Alice Hardy of Hodge Jones & Allen solicitors making representations on behalf of certain interested third parties

AND UPON reading the Claimant's application by Application Notice dated 14 March 2022 to extend the duration of the interim injunction in this claim made by Cotter J on 7 December 2021, the Claimant's skeleton argument, and the witness statement of Glynn Barton dated 1 April 2022

AND UPON the Claimant indicating that it will provide to the Defendants copies of further evidence or other documents filed in these proceedings upon request, following the Defendants or their representatives providing contact details to the Claimant's solicitors

AND UPON the Court accepting the Claimant's undertaking that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss

AND UPON the Claimant undertaking to identify and name Defendants and apply to add them as named Defendants to this Order as soon as reasonably practicable

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. The “within 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 within-named Defendants.
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 Order replaces the Order in this claim made by Cotter J on 7 December 2021 (sealed on 15 December 2021), which is discharged with effect from today

Injunction in force

4. With immediate effect until the earlier of (i) disposal of the Claimant’s Summary Judgment Application in this Claim; 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.
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.
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. Send a copy of this Order to Insulate Britain's email address: Insulate Britain ring2021@protonmail.com.
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, to serve this Order, the Claim Form, and any other documents in these proceedings by both of the following methods together:
 - a. Service on Insulate Britain by email; and
 - b. Posting a copy through the letterbox of each Defendant (or leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing a copy may be affixed to the front door marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The Notices shall be given in prominent lettering in the form set out in Schedule 1.

Disclosure

10. The Claimant is granted a disclosure order under CPR r31.17 in the following terms:
- a. the Metropolitan Police shall by 4pm on 8 April 2022 disclose to the Claimant the name and address of any person whose name has not previously been disclosed who has been arrested by one of their officers in the course of, or as a result of, any protests on the Roads which have been carried out on behalf of, in association with, under the instruction or direction of, or using the name of, Insulate Britain;
 - b. the Metropolitan Police shall disclose to the Claimant as soon as reasonably practicable all arrest notes, body cam footage and/or other photographic material not previously disclosed relating to any breach of this Interim Injunction or its predecessors in this claim;
 - c. the disclosure duties in sub-paragraphs a.-b. on the Metropolitan Police shall be continuing ones, continuing until 27 May 2022.

Further directions

11. This claim shall proceed and be heard together with Claim no. QB-2021-004122
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 48 hours 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, and must also apply to be joined as a named defendant to the proceedings at the same time.
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 48 hours before the application hearing (excluding weekends and bank holidays)
15. The Claimant has permission to apply to extend or vary this Order or for further directions.

Communications with the Claimant

16. Costs reserved

17. 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

Mr Justice Martin Spencer

Dated: 4 April 2022

SCHEDULE 1

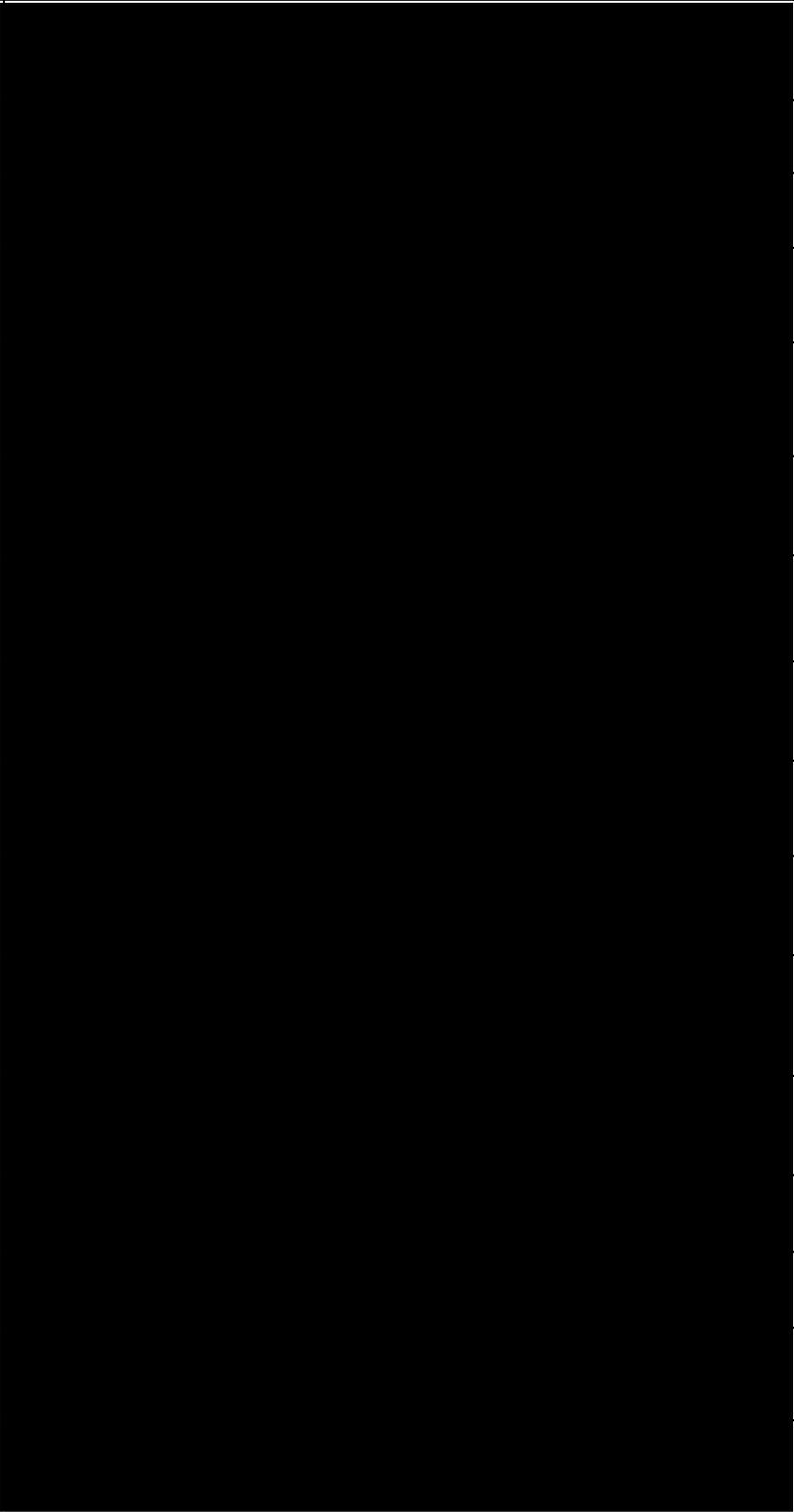
[On the package containing a Court order/proceedings]

“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 02030547921

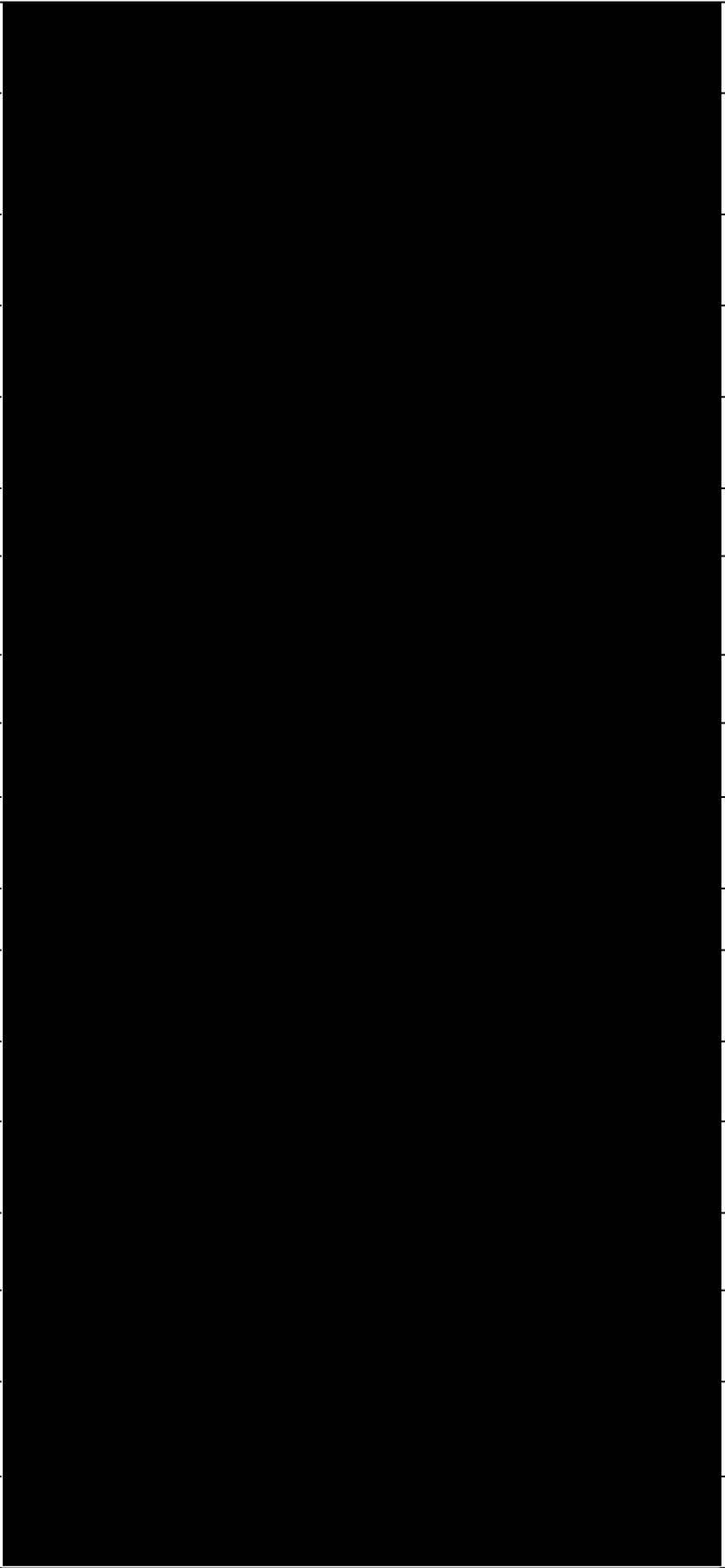
[To affix to front door when the package has been posted through the letterbox or placed in a mailbox]

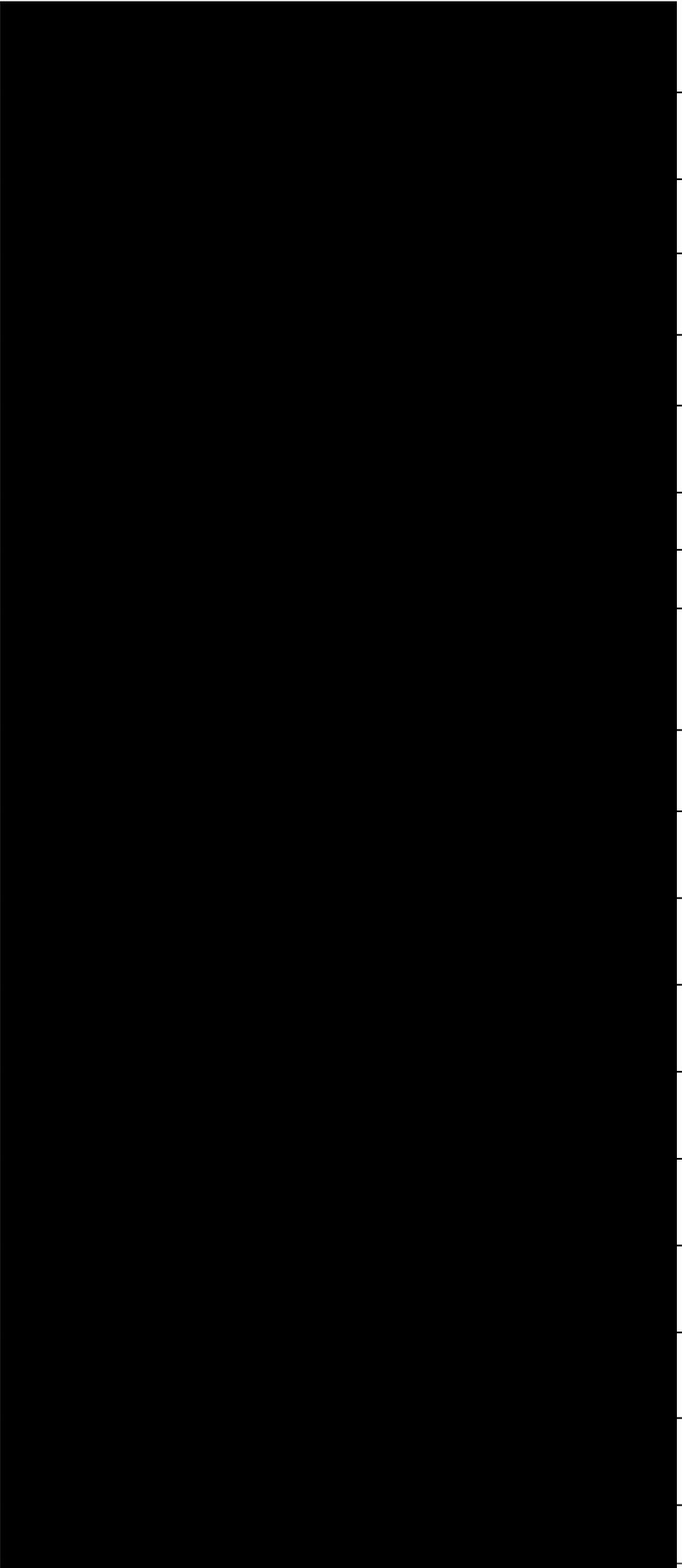
“VERY URGENT: A PACKAGE HAS BEEN LEFT THAT CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL - Mr Abbey Ameen of TfL 02030547921

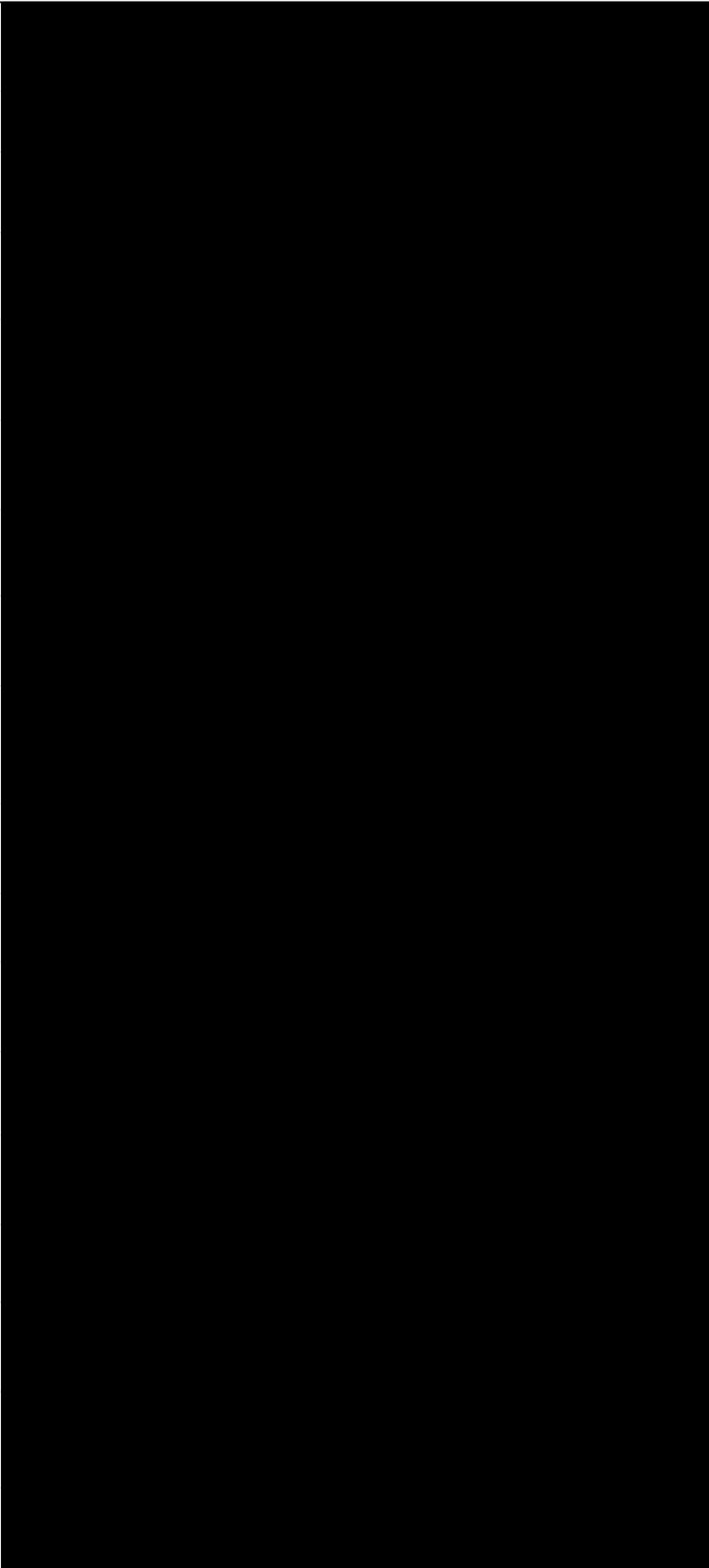
ANNEX 1 – SCHEDULE OF NAMED DEFENDANTS IN CLAIM NO. QB-2021-003841 (AS AMENDED 26.11.21)

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

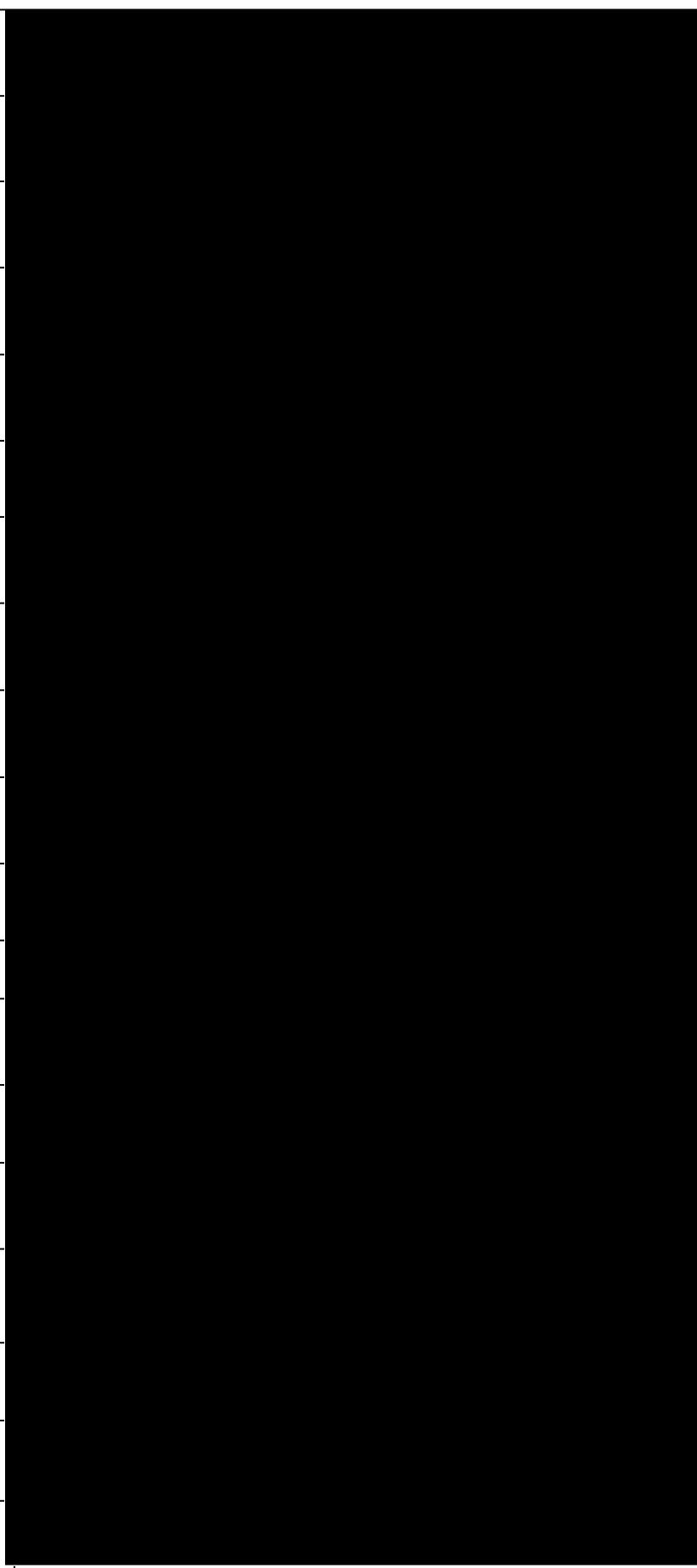
17	Christian ROWE	
18	Cordelia ROWLATT	
19	Daniel SARGISON	
20	Daniel SHAW	
21	David CRAWFORD	
22	David JONES	
23	David NIXON	
24	David SQUIRE	
25	Diana BLIGH	
26	Diana HEKT	
27	Diana Lewen WARNER	
28	Donald BELL	
29	Edward HERBERT	
30	Elizabeth ROSSER	
31	Emily BROCKLEBANK	
32	Emma Joanne SMART	
33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

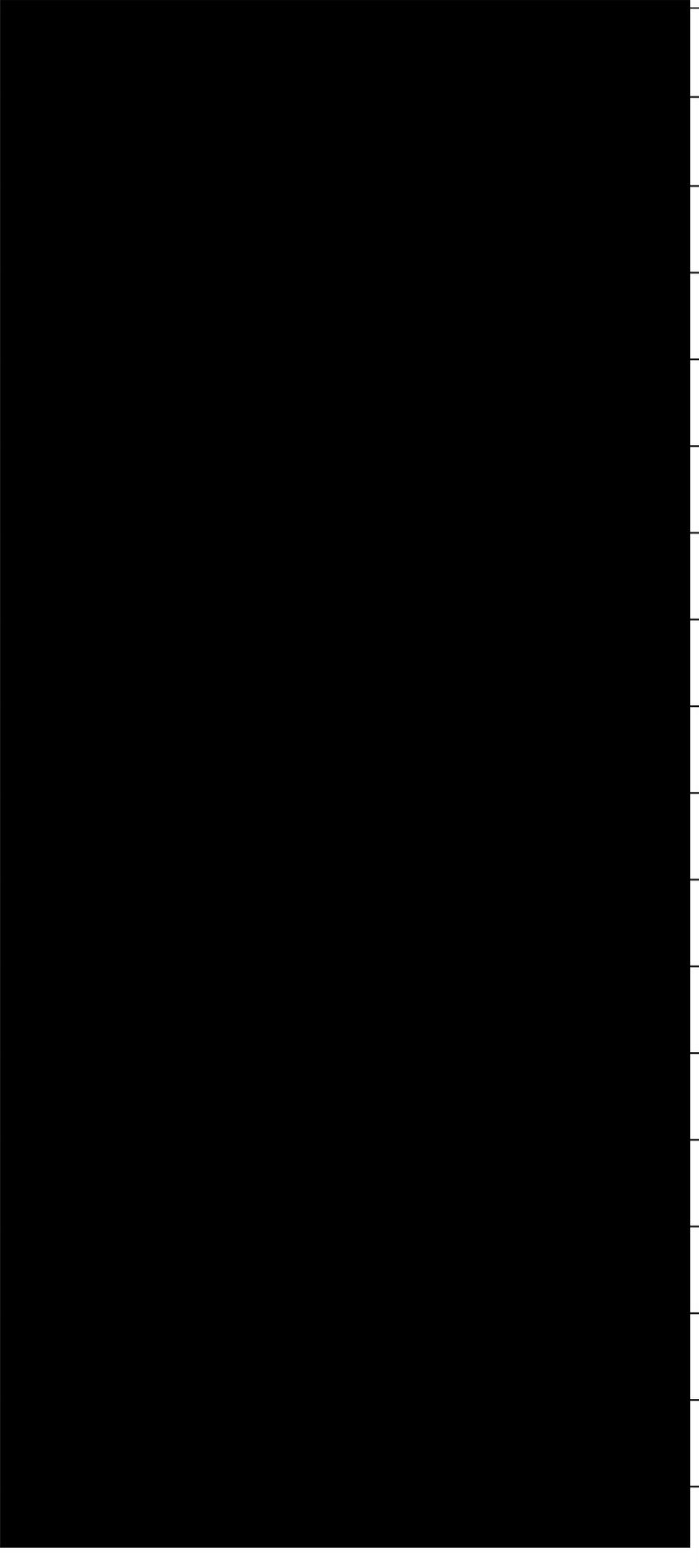
36	Harry BARLOW	
37	Ian BATES	
38	Ian Duncan WEBB	
39	James BRADBURY	
40	James SARGISON	
41	James THOMAS	
42	Janet BROWN	
43	Janine EAGLING	
44	Jerrard Mark LATIMER	
45	Jessica CAUSBY	
46	Jonathan COLEMAN	
47	Joseph SHEPHERD	
48	Joshua SMITH	
49	Judith BRUCE	
50	Julia MERCER	
51	Julia SCHOFIELD	
52	Karen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

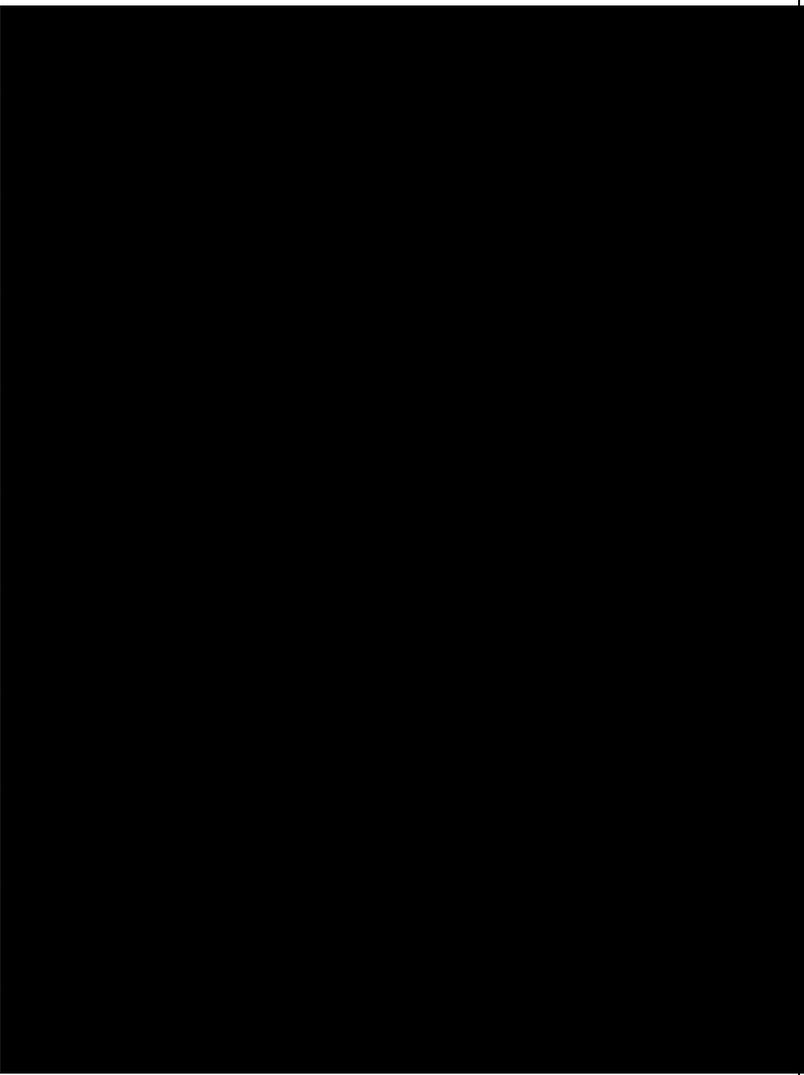
54	Liam NORTON	
55	Louis MCKECHNIE	
56	Louise Charlotte LANCASTER	
57	Lucy CRAWFORD	
58	Mair BAIN	
59	Margaret MALOWSKA	
60	Marguerite DOUBLEDAY	
61	Maria LEE	
62	Martin NEWELL	
63	Mary ADAMS	
64	Matthew LUNNON	
65	Matthew TULLEY	
66	Meredith WILLIAMS	
67	Michael BROWN	
68	Michael WILEY	
69	Michelle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

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

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

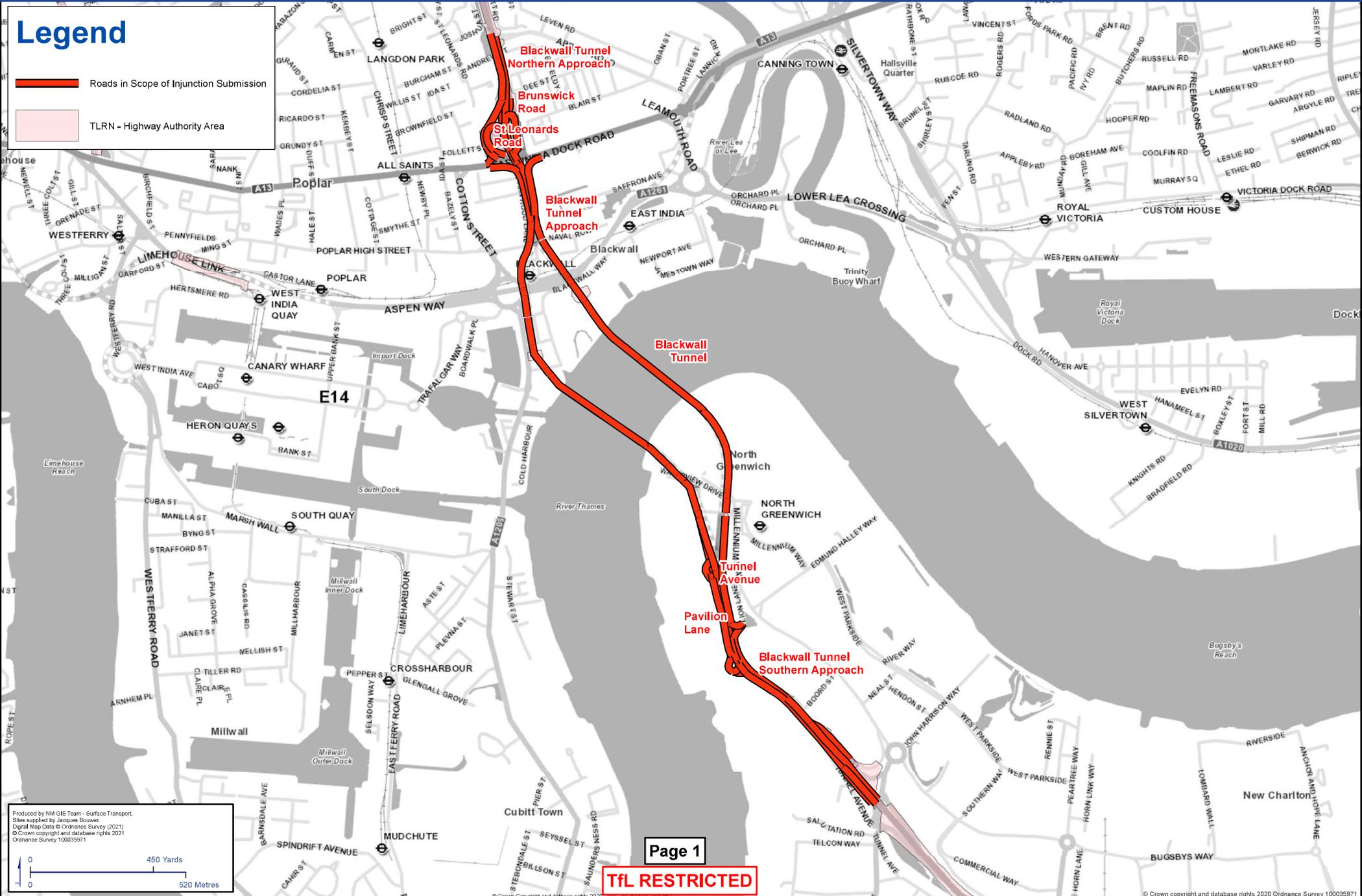


110	Venitia CARTER	
111	Victoria Anne LINDSELL	
112	Xavier GONZALEZ TRIMMER	
113	Bethany MOGIE	
114	Indigo RUMBELOW	
115	Adrian TEMPLE-BROWN	
116	Ben NEWMAN	
117	Christopher PARISH	
118	Elizabeth SMAIL	
119	Julian MAYNARD SMITH	
120	Rebecca LOCKYER	
121	Simon MILNER-EDWARDS	
122	Stephen BRETT	
123	Virginia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

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

Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Blackwall Tunnel and both approaches

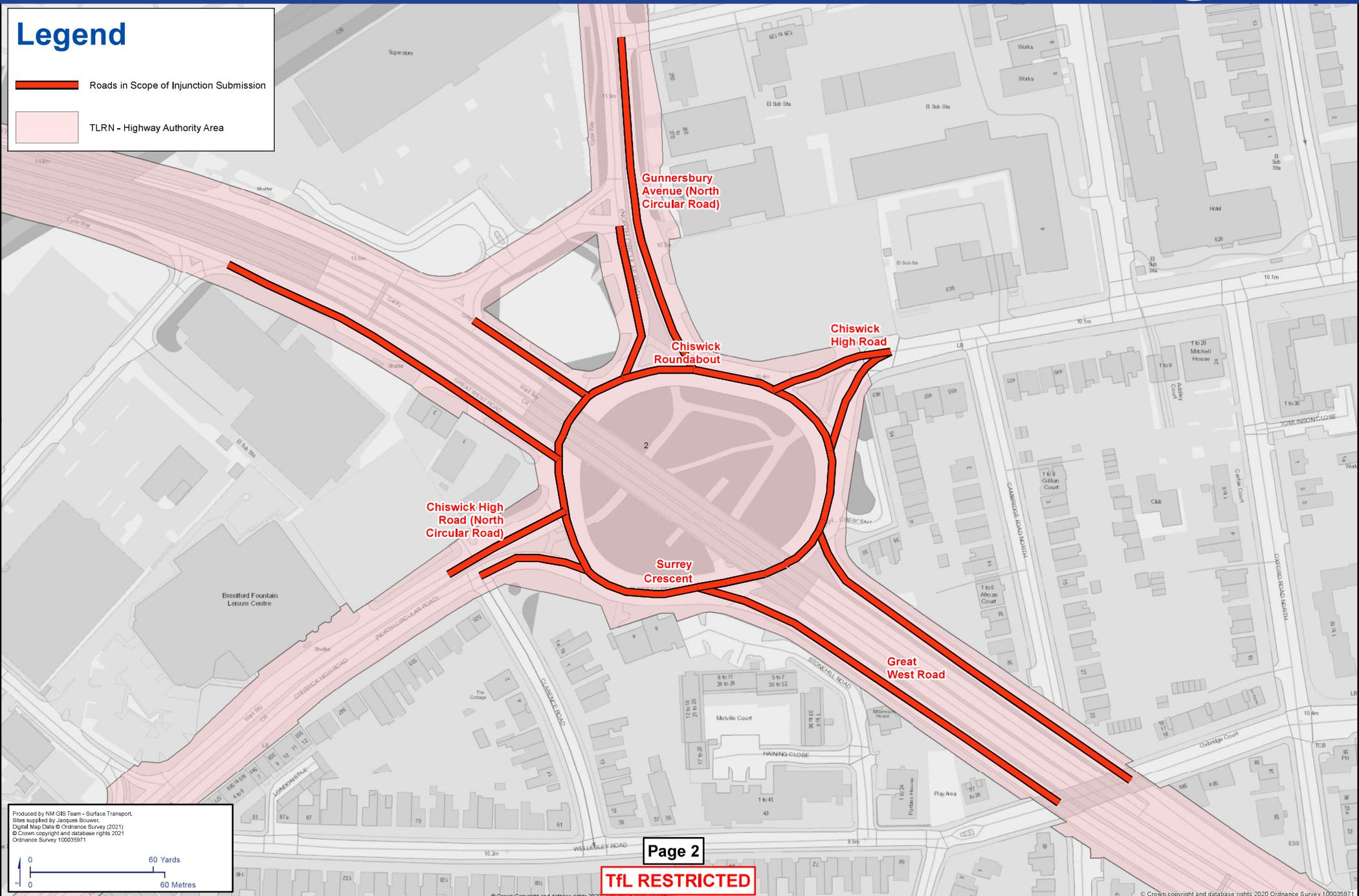


Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Chiswick Roundabout

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area



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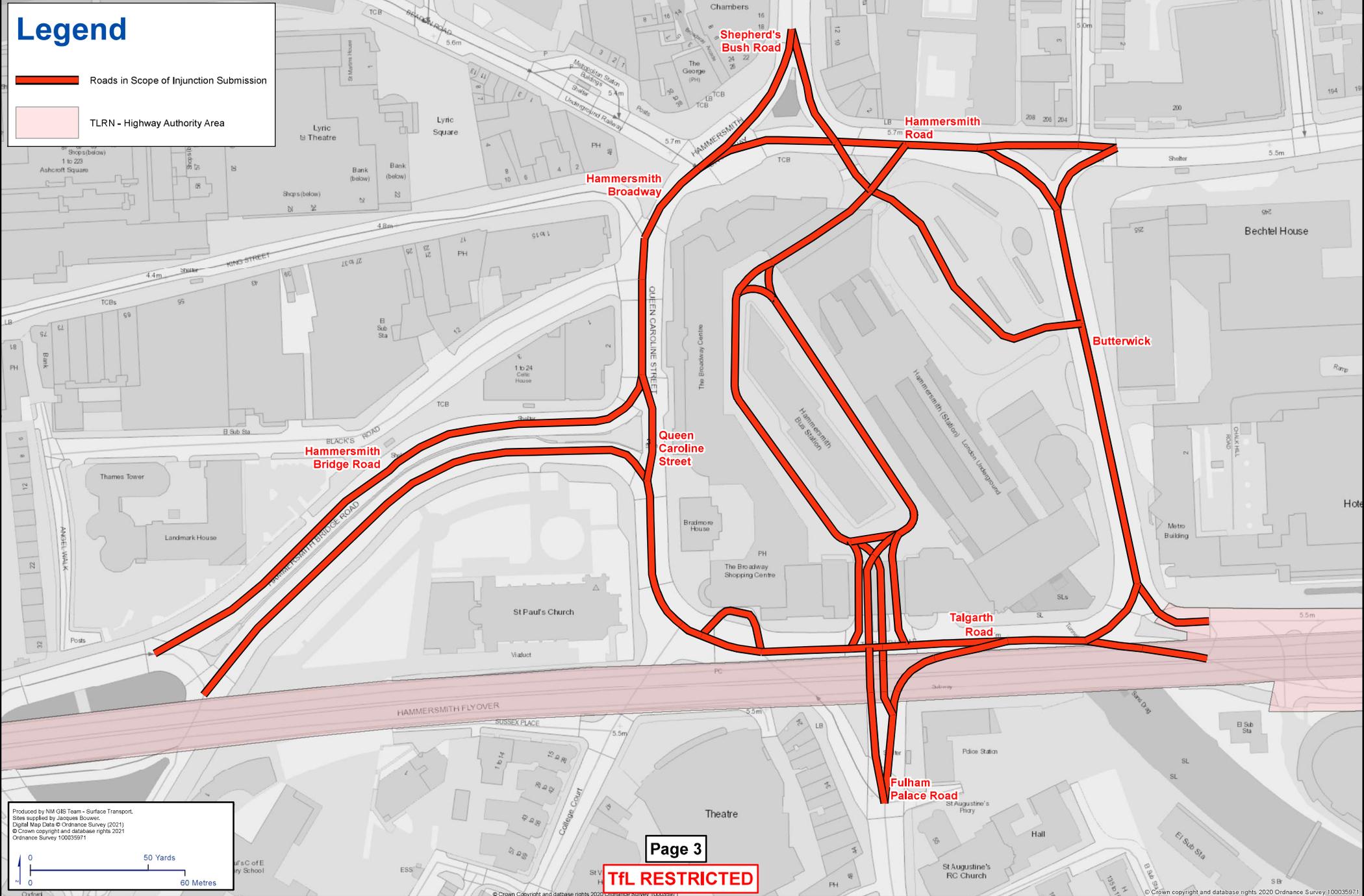
0 60 Yards
0 60 Metres

Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Hammersmith Gyratory Inclusive of all adjoining entry and exit roads

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area



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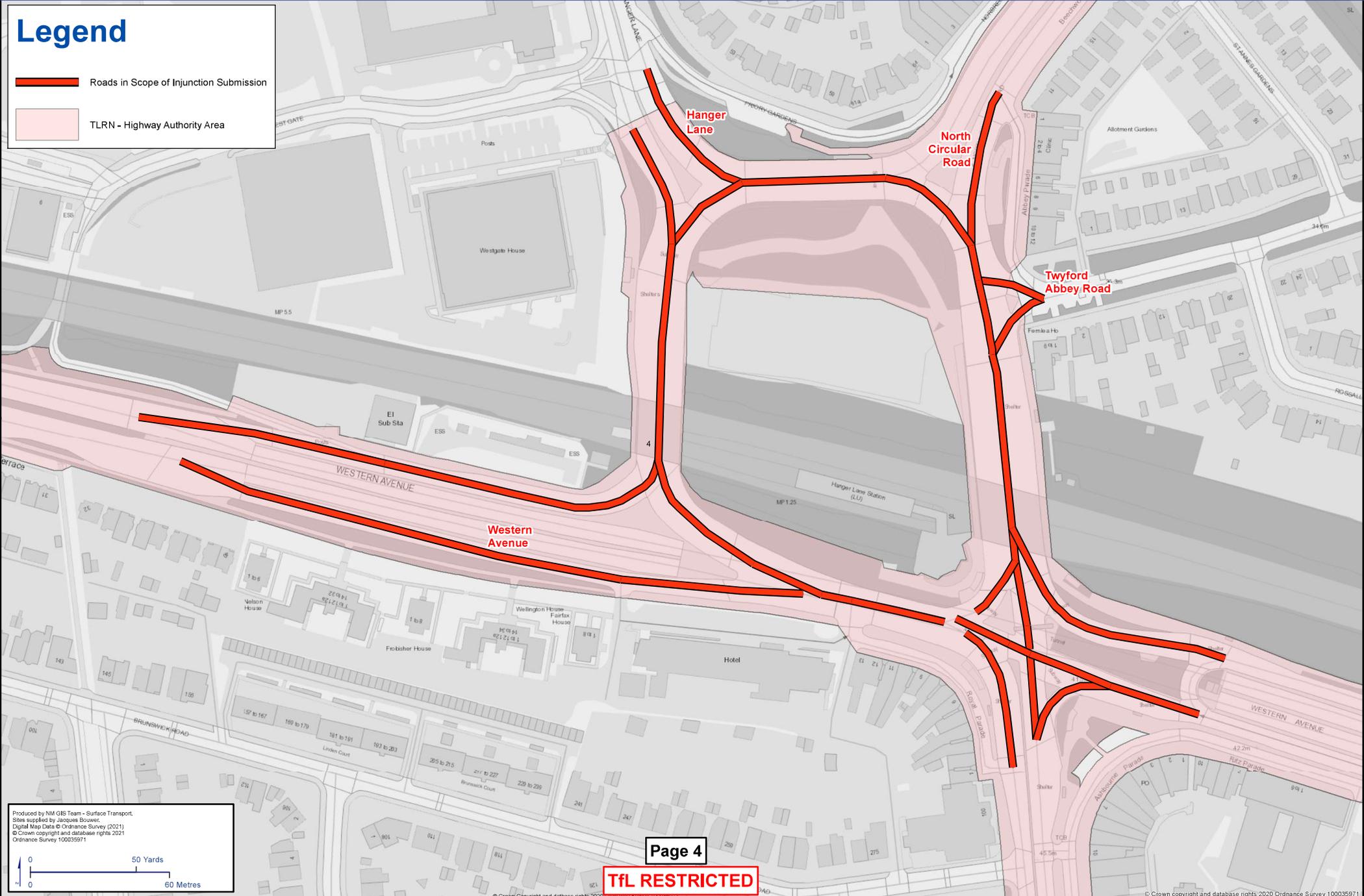


Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Hanger Lane Gyratory Inclusive of all adjoining entry and exits points

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area

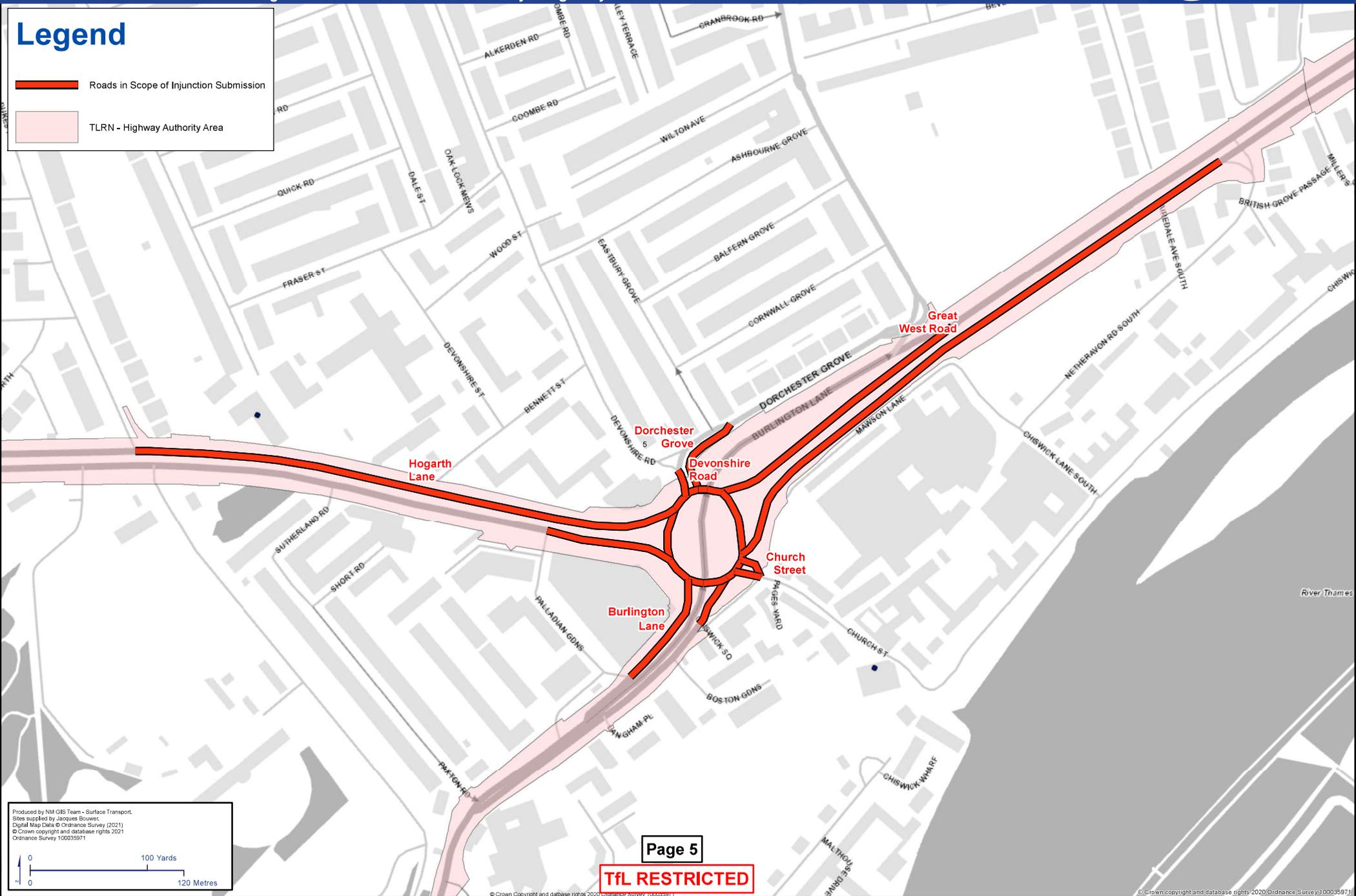


Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Hogarth Roundabout Inclusive of all adjoining entry and exit roads

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area



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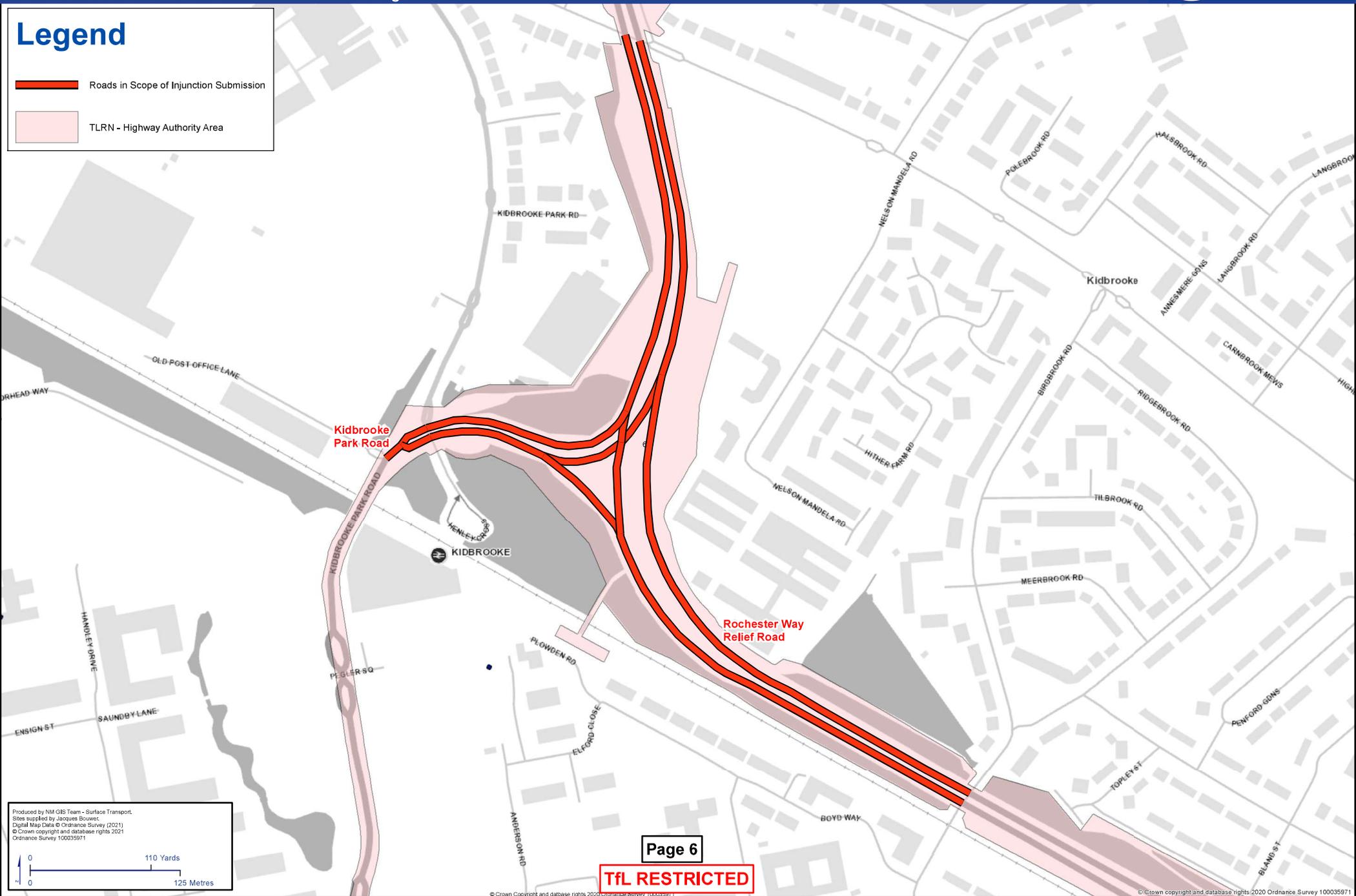
0 100 Yards 120 Metres

Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Kidbrooke Interchange

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area



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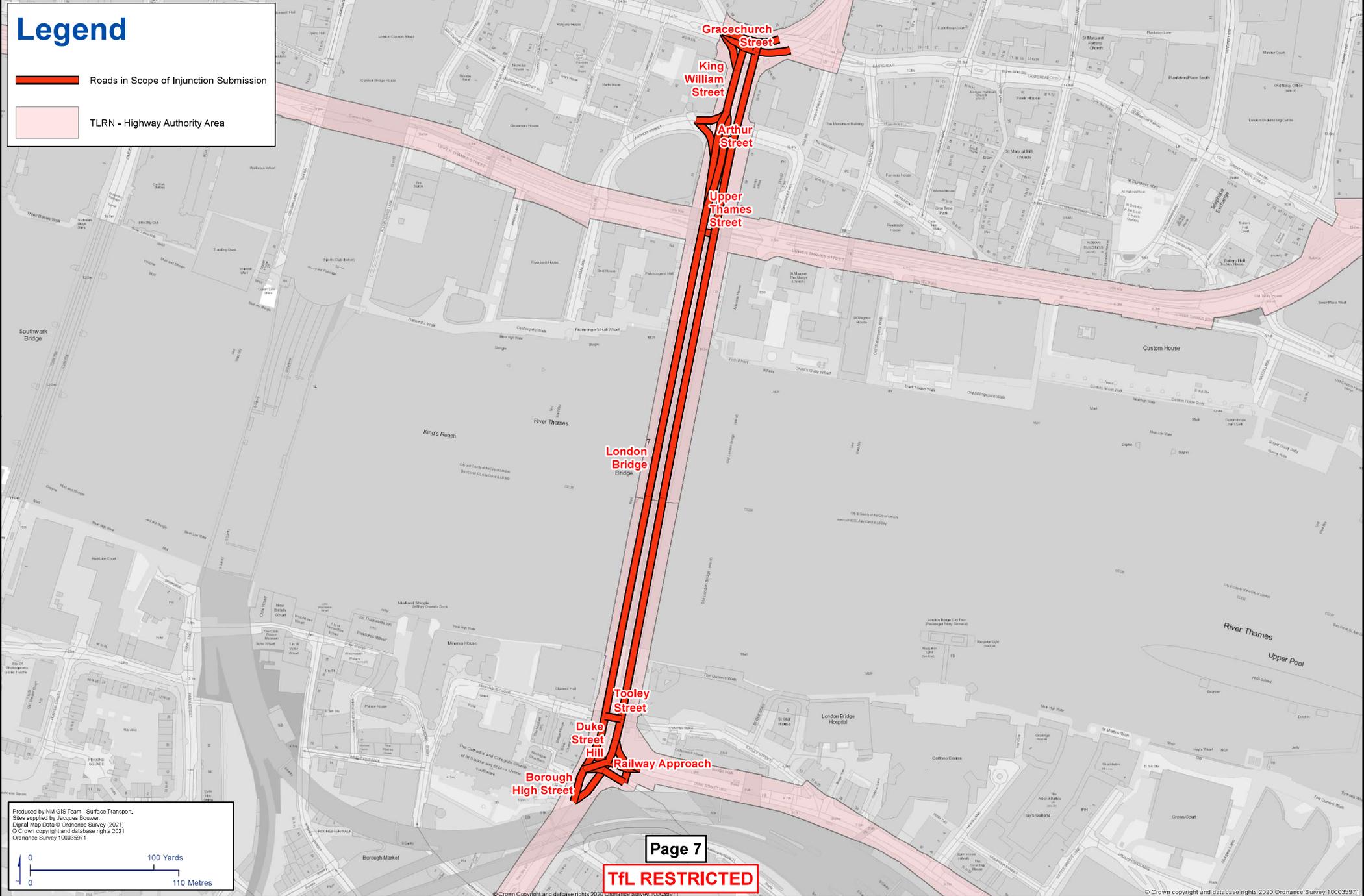
0 110 Yards
0 125 Metres

Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - London Bridge and both approaches

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area



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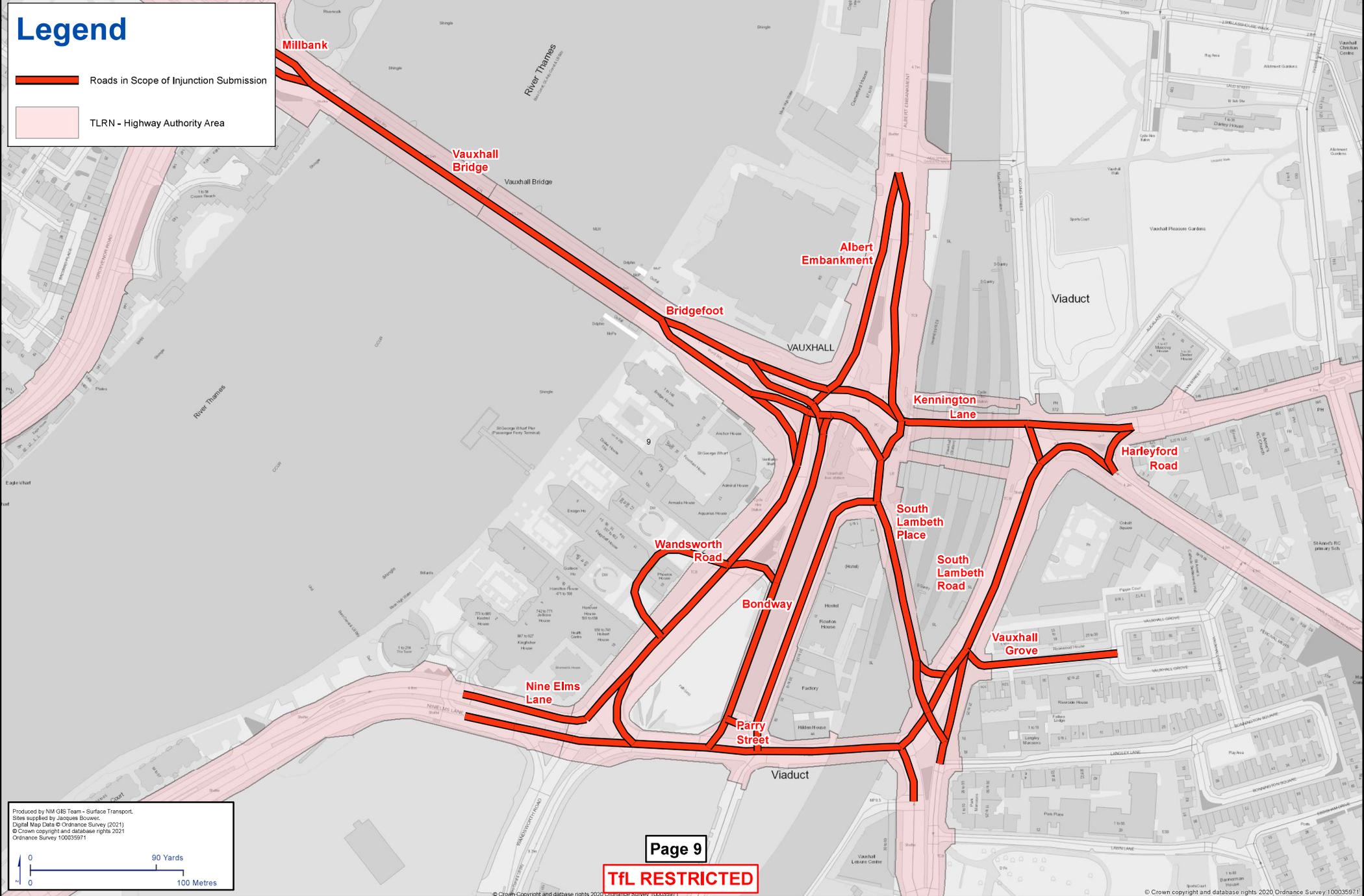
0 100 Yards
0 110 Metres

Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Vauxhall Bridge including Vauxhall Gyratory and all entry and exit roads

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area



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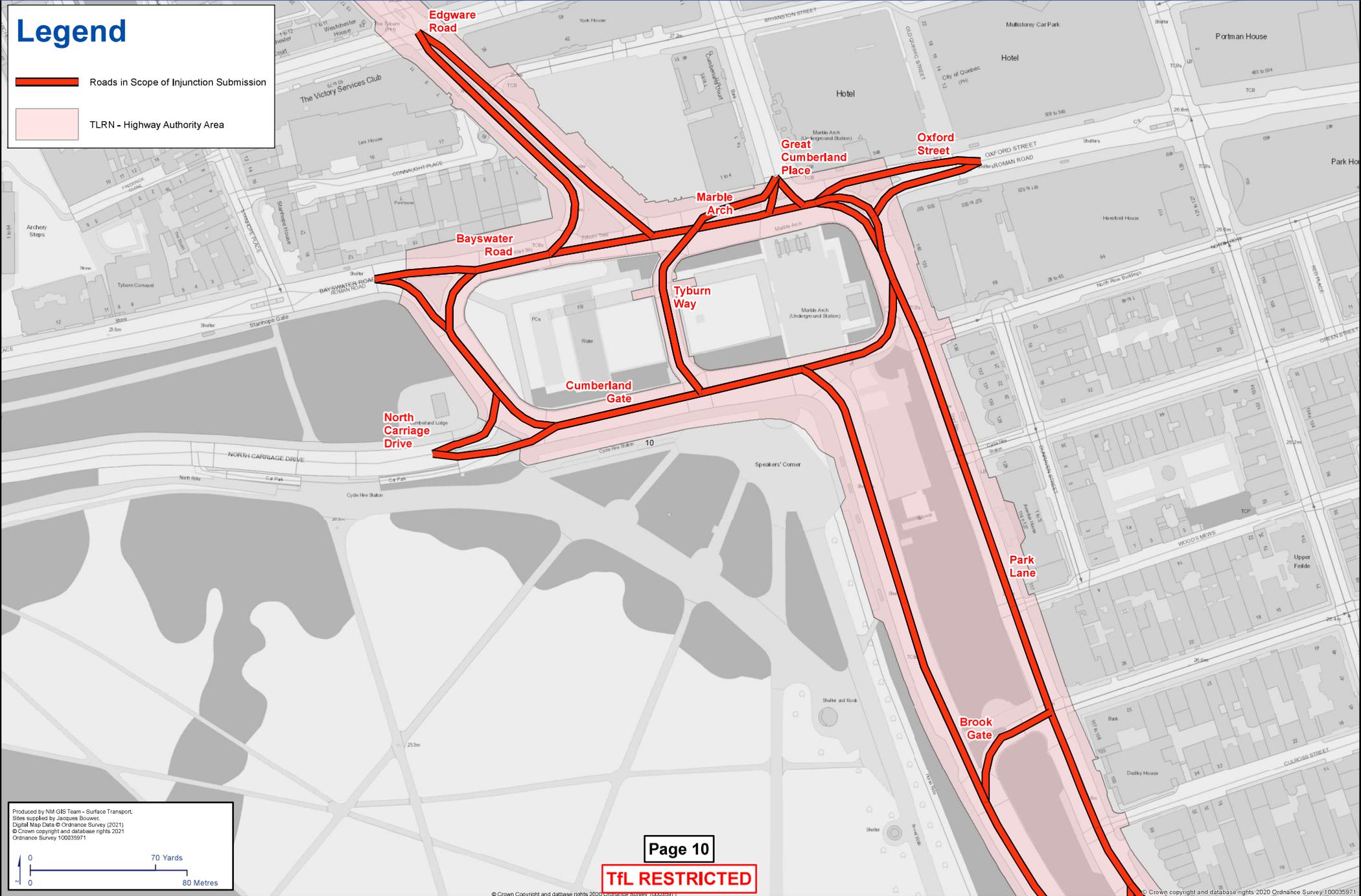


Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Marble Arch Inclusive of all entry and exit roads

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area



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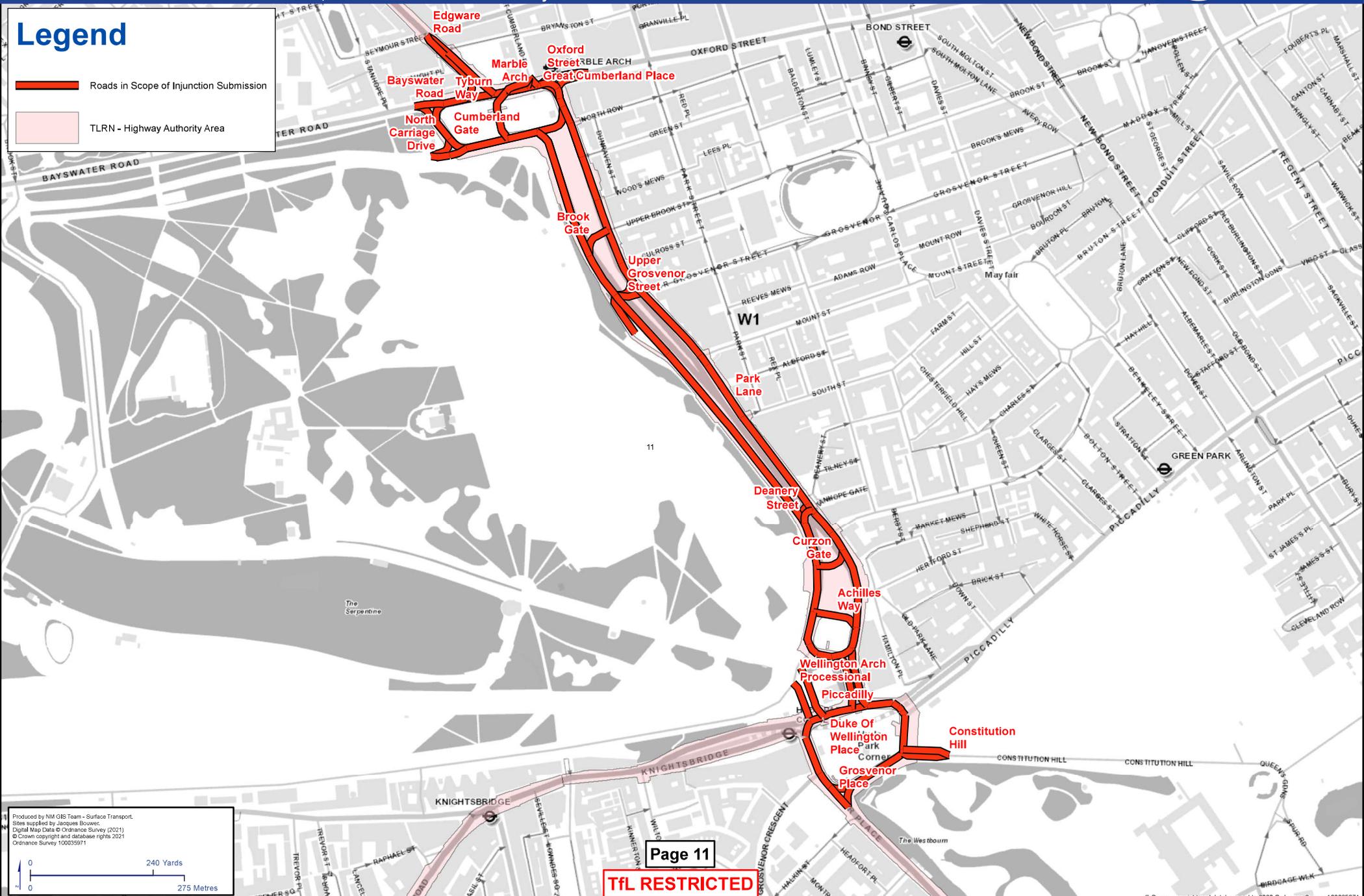


Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Park Lane, inclusive of Marble Arch and Hyde Park Corner

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area



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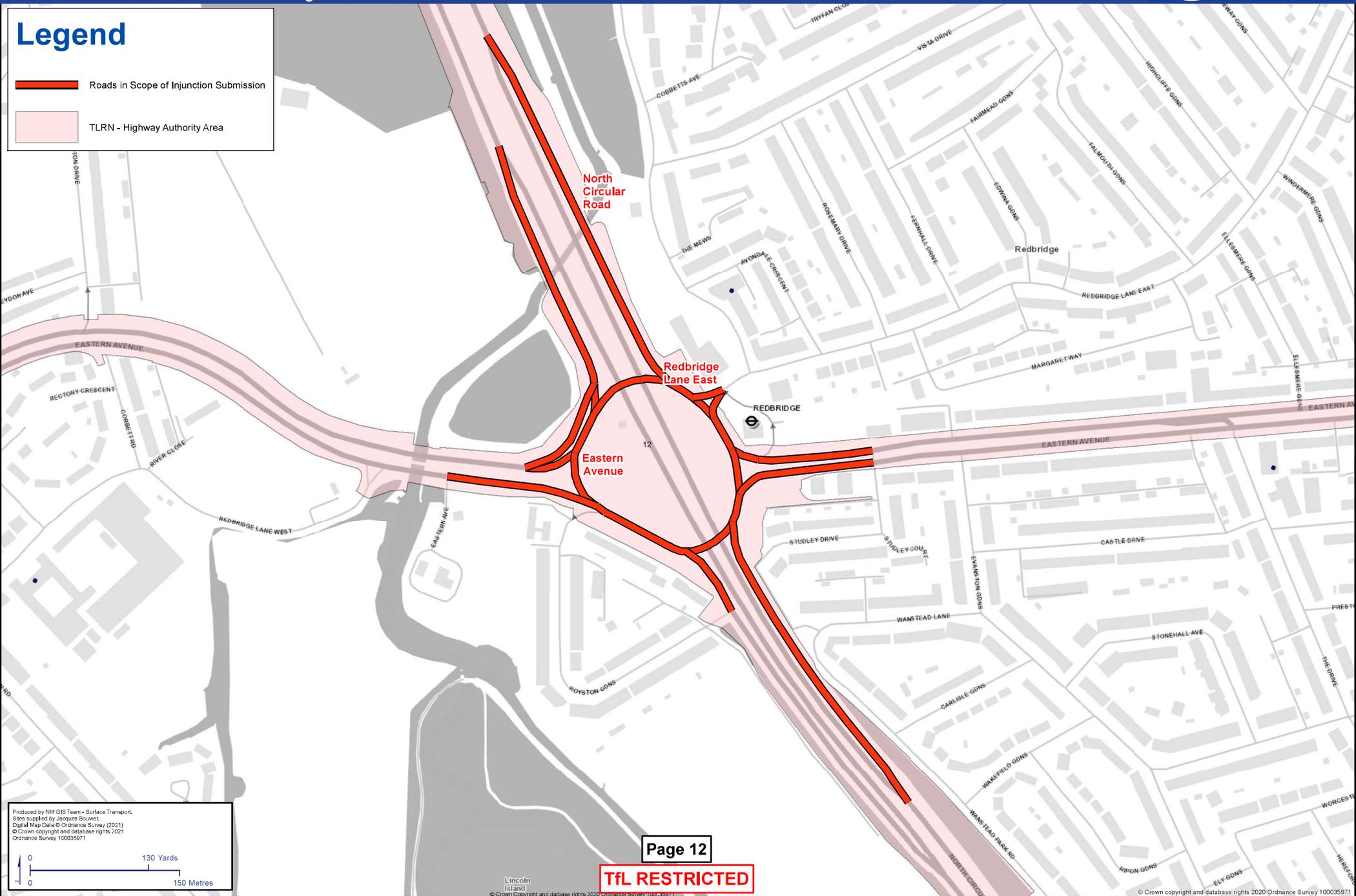


Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Redbridge Roundabout

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area



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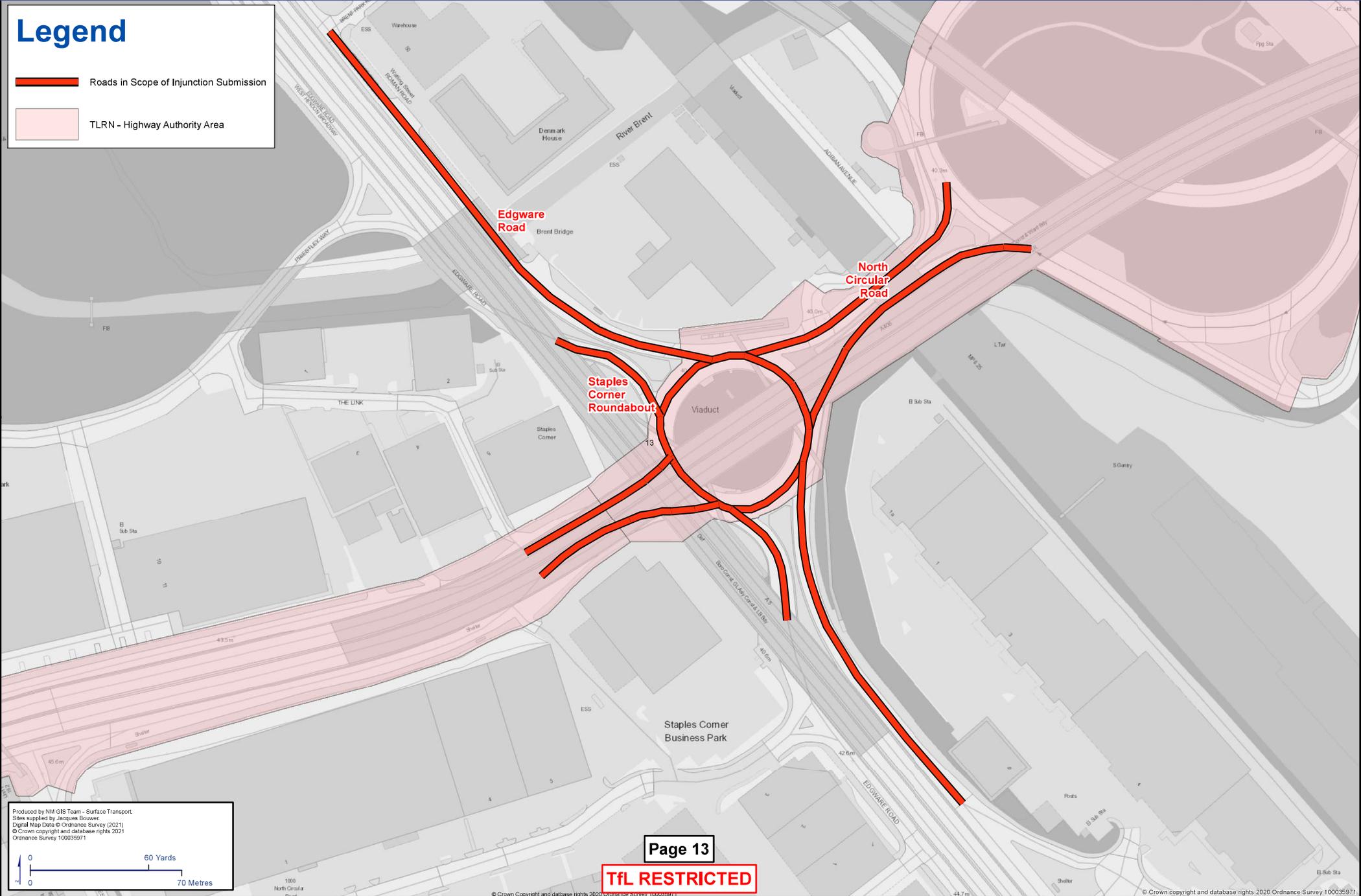
0 130 Yards
0 150 Metres

Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Staples Corner

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area



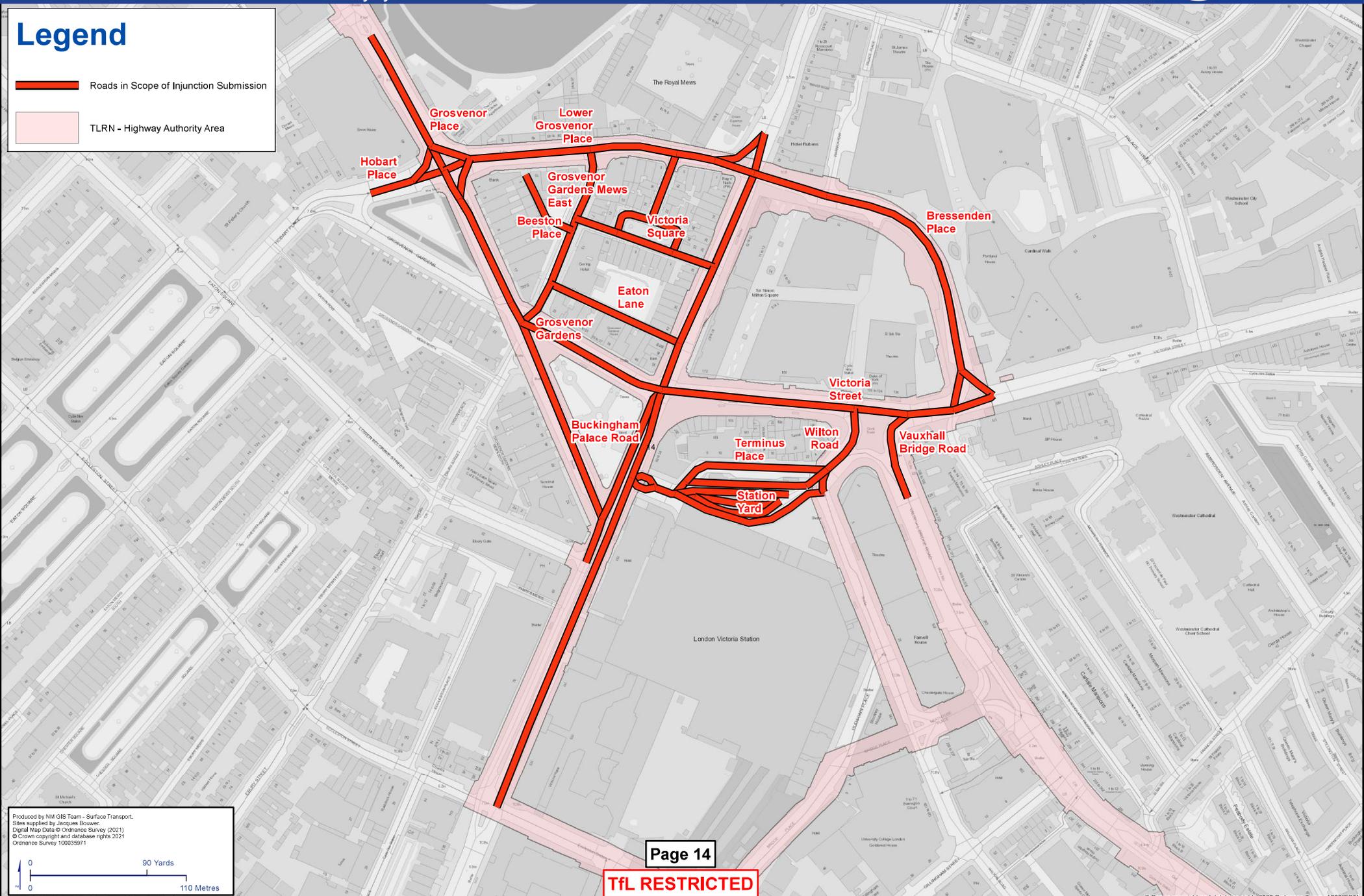
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Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Victoria One Way system

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area



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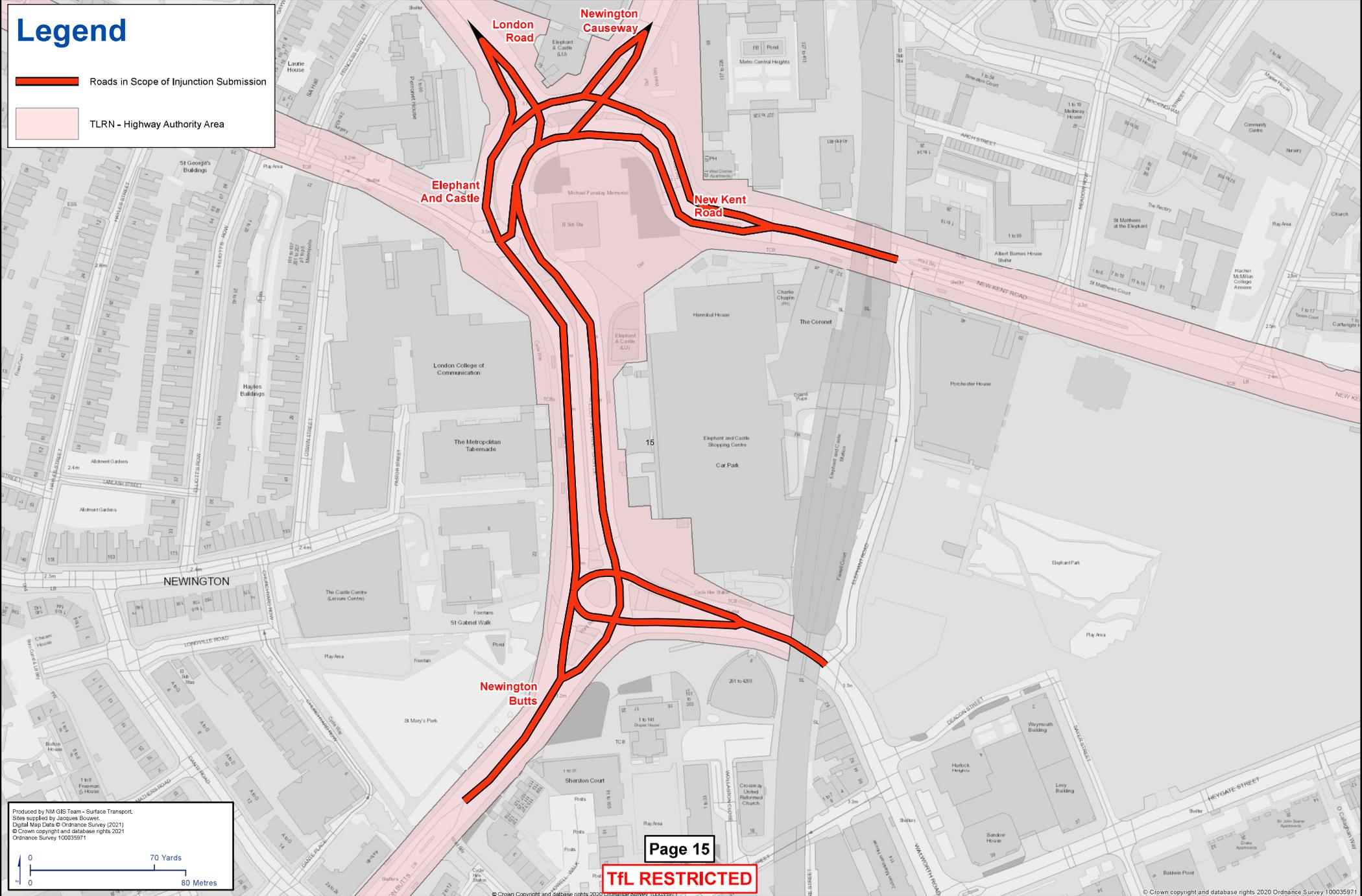
0 90 Yards 110 Metres

Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Elephant and Castle Inclusive of all entry and exit roads.

Legend

-  Roads in Scope of Injunction Submission
-  TLRN - Highway Authority Area



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