

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim no. QB-2021-----

Before: Mrs Justice May
On: 8 October 2021

B E T W E E N:

TRANSPORT FOR LONDON

-and-



(1) PERSONS UNKNOWN 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 EDWARE ROAD TO OLD STREET; 11) STAPLES CORNER; 12) CHISWICK ROUNDABOUT; 13) REDBRIDGE ROUNDABOUT; 14) KIDBROOKE INTERCHANGE, FOR THE PURPOSES OF PROTESTING

(2) MR ALEXANDER RODGER AND 112 OTHERS

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 the Claimant's application in trespass and nuisance by Claim Form dated 8 October 2021 ("**the Claim**")

AND UPON READING the Claim Form and the Witness Statement of Glynn Barton dated 8 October 2021

AND UPON the Claimant undertaking to file the claim and application, and the note of this hearing, and pay the relevant court fees by the end of the next working day after the sealing of this order

AND UPON hearing Andrew Fraser-Urquhart QC and Charles Forrest, Counsel for the Claimant

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 which does not slow, obstruct, prevent or otherwise interfere with the flow of traffic onto off or along 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 (“the Roads”) nor to prevent lawful use of them by any person

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 but not limited to any verges, central reservations, and any apparatus related to those Roads.

Injunction in force

3. With immediate effect until 23:59 on Tuesday 19 October (and the injunction will continue in force in the event the return date is adjourned to another date), the Defendants and each of them are forbidden from:
 - 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.
 - c. 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.
 - d. Affixing themselves (“locking on”) to the Roads or any of them or to any other person or object on the Roads or any of them..
 - e. Erecting any structure on the Roads.
 - f. Tunnelling in the vicinity of the Roads.
 - g. Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.

- h. Refusing to leave the area within 30m of the centre of the Roads when asked to do so by a police constable, TfL Road Traffic Enforcement Officers or High Court Enforcement Officer.
- i. Causing, assisting or encouraging any other person to do any act prohibited by paragraphs a-h above.
- j. Continuing any act prohibited by sub-paragraphs a-i above.

4. The Claimant shall:

- a. Place copies of this Order and the Claim Form on the TfL and Mayor of London/GLA London.gov.uk websites; and
- b. Send a copy of this Order and the Claim Form to Insulate Britain's email address: ring2021@protonmail.com.

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

Alternative Service

6. The Claimant is permitted, in addition to personal service, to serve this Order and the Claim Form and other documents in these proceedings by both of the following methods together:

- a. Service of the sealed Order on Insulate Britain by email; and
- b. Posting a copy of this Order together with a copy of the claim form and evidence in support 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 this Order and the proceedings 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.

Further directions

7. 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).

8. 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.
9. The Claimant has permission to apply to extend or vary this Order or for further directions.
10. The return date hearing to be listed for 10am on 19 October 2021 in person, time estimate 3 hours
11. Any Defendant who proposes to attend and oppose the order on the return date shall file a skeleton argument and any evidence to be relied upon by no later than 10 am on 18 October 2021.
12. Costs reserved.

Communications with the Claimant

13. 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

Mrs Justice May

Dated: 8 October

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

Claim no. QB-2021-----

B E T W E E N:

TRANSPORT FOR LONDON

Claimant

-and-

**(1) PERSONS UNKNOWN XXX (INSERT DESCRIPTION)
(2) NAMED DEFENDANTS?**

Defendants

ANNEX 1 - NAMED DEFENDANTS

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

Claim no. QB-2021-----

B E T W E E N:

TRANSPORT FOR LONDON

Claimant

-and-

**(1) PERSONS UNKNOWN XXX (INSERT DESCRIPTION)
(2) NAMED DEFENDANTS?**

Defendants

ANNEX 2 – PLANS OF ROADS

SCHEDULE 1

[On the package containing the Court order and proceedings]

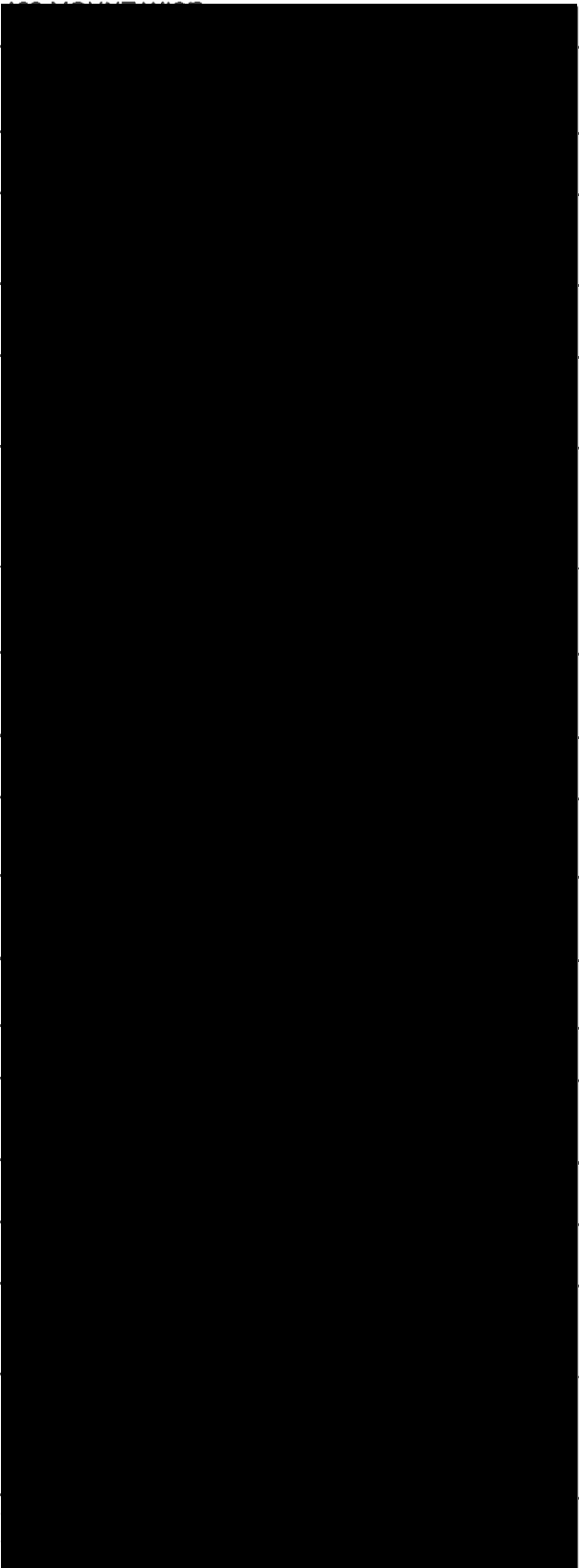
**“VERY URGENT: THIS PACKAGE CONTAIN AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL – Mr Abbey Ameen of Tfl
02030547921**


[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

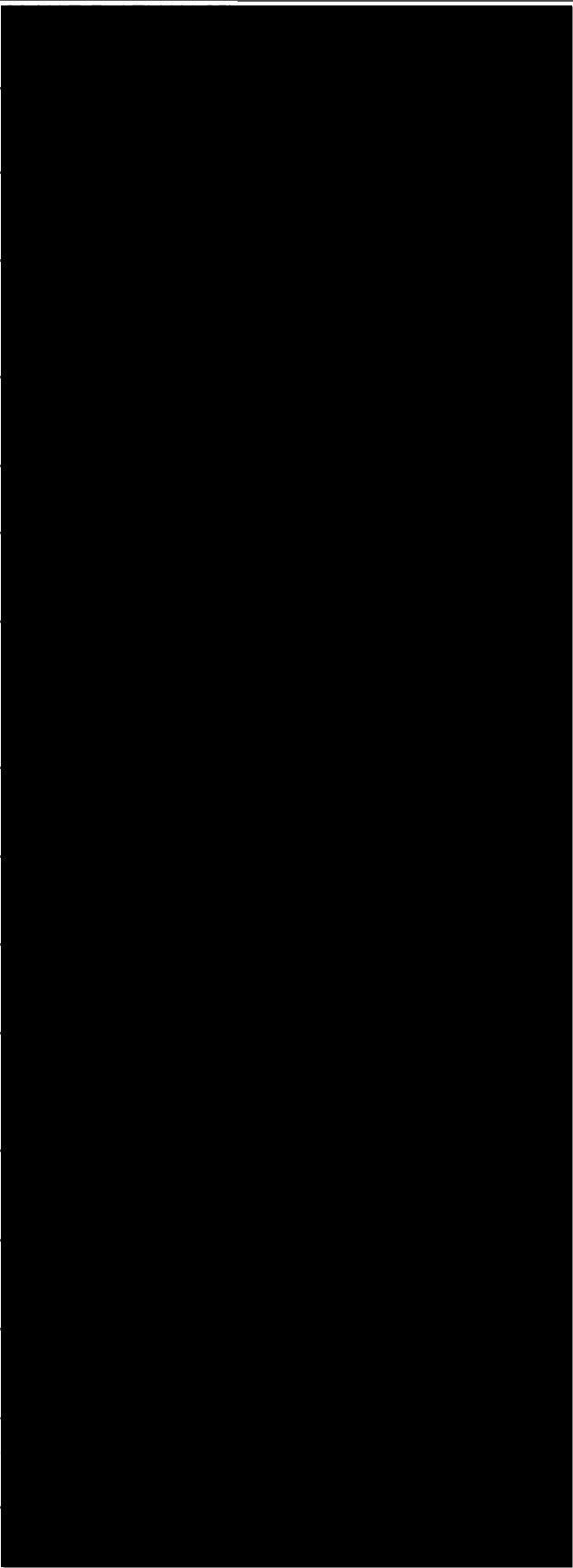
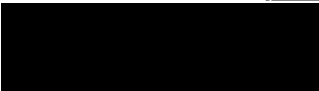
SCHEDULE 1 – NAMED DEFENDANTS

	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	Cathy 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 Dowbleday	
61	Maria Lee	
62	Martin NEWELL	
63	Mary Adams	
64	Martin Lunnon	
65	Matthew Tulley	
66	Meredith Williams	
67	Michael Brown	
68	Michael WILEY	
69	Michelle Charlesworth	
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	

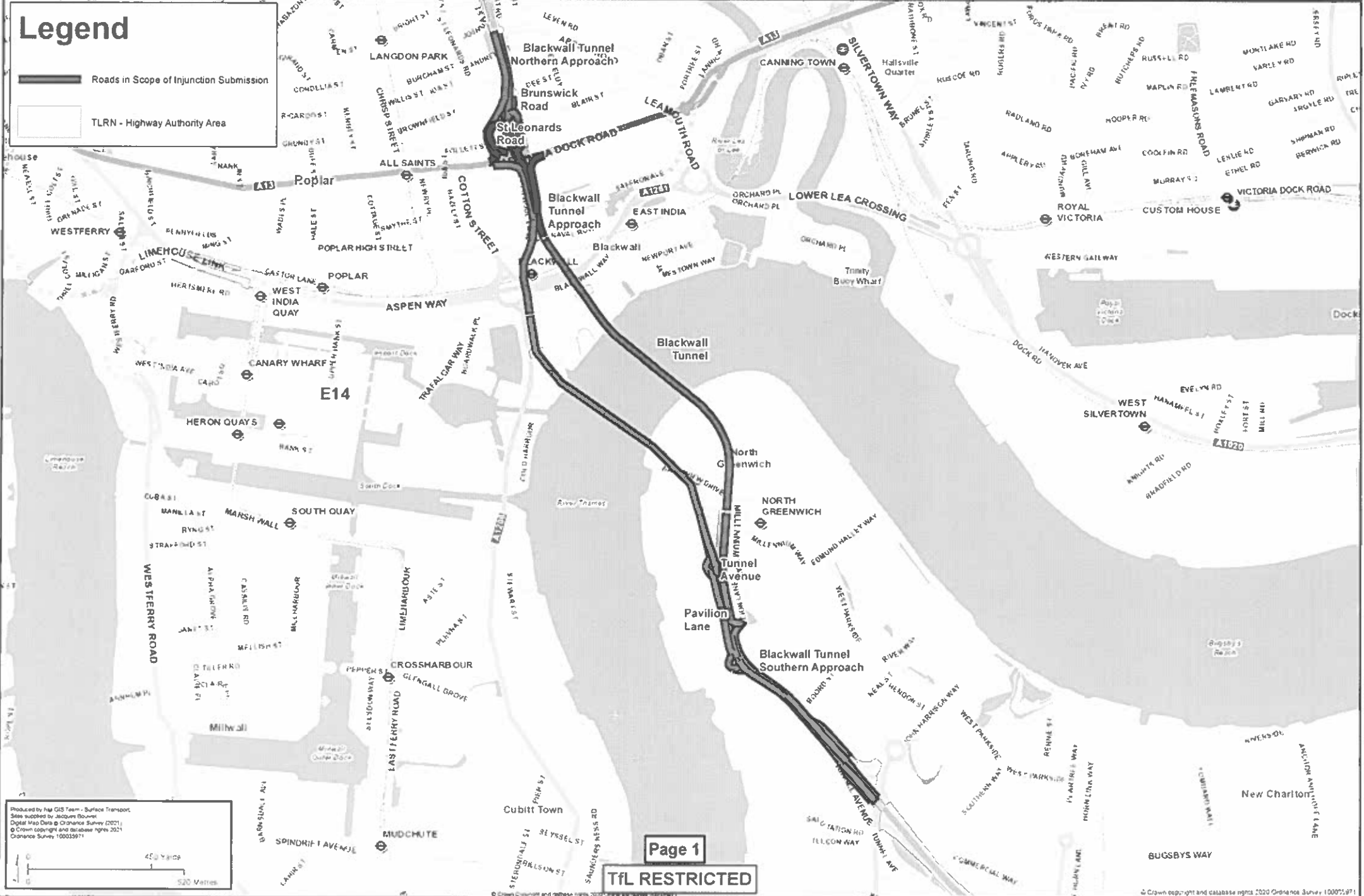
95	Stephen Gower	
96	Stephen Pritchard	
97	Sue Chambers	
98	Sue Parfitt	
99	Sue Spencer-Longhurst	
100	Susan HAGLEY	
101	Suzie WEBB	
102	Tam Millar	
103	Tessa-Marie Burns	
104	Teresa NORTON	
105	Tim Speers	
106	Tim William Hewes	
107	Tracey Mallaghan	
108	Tryrone Hodge	
109	Valeria SAUNDERS	
110	Venitia CARTER	
111	Victoria Anne Lindsell	
112	Xabier GONZALEZ TRIMMER	

Climate Protest Injunction - Key Areas


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

Legend

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



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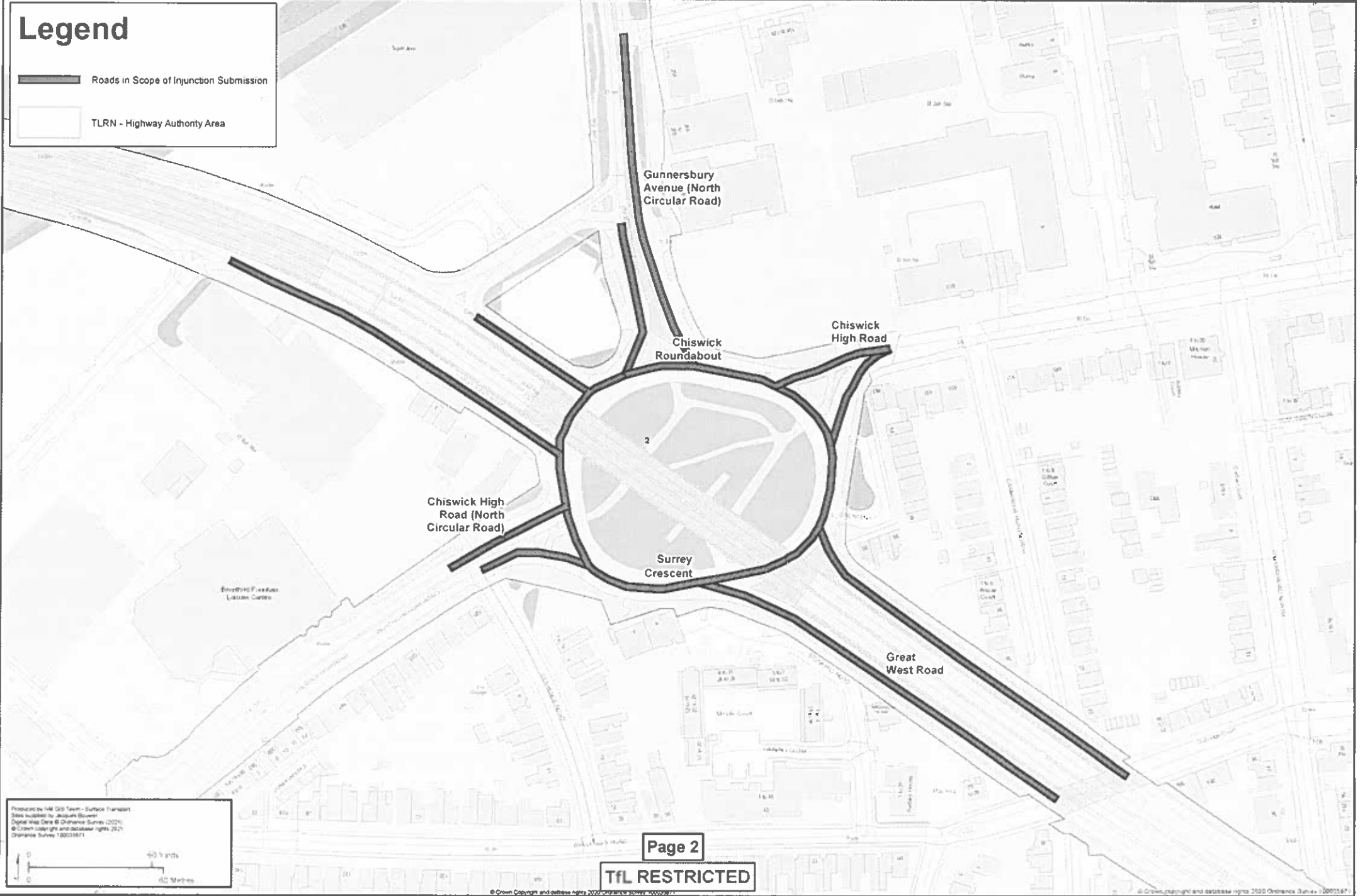
Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Chiswick Roundabout

Legend

 Roads in Scope of Injunction Submission

 TLRN - Highway Authority Area





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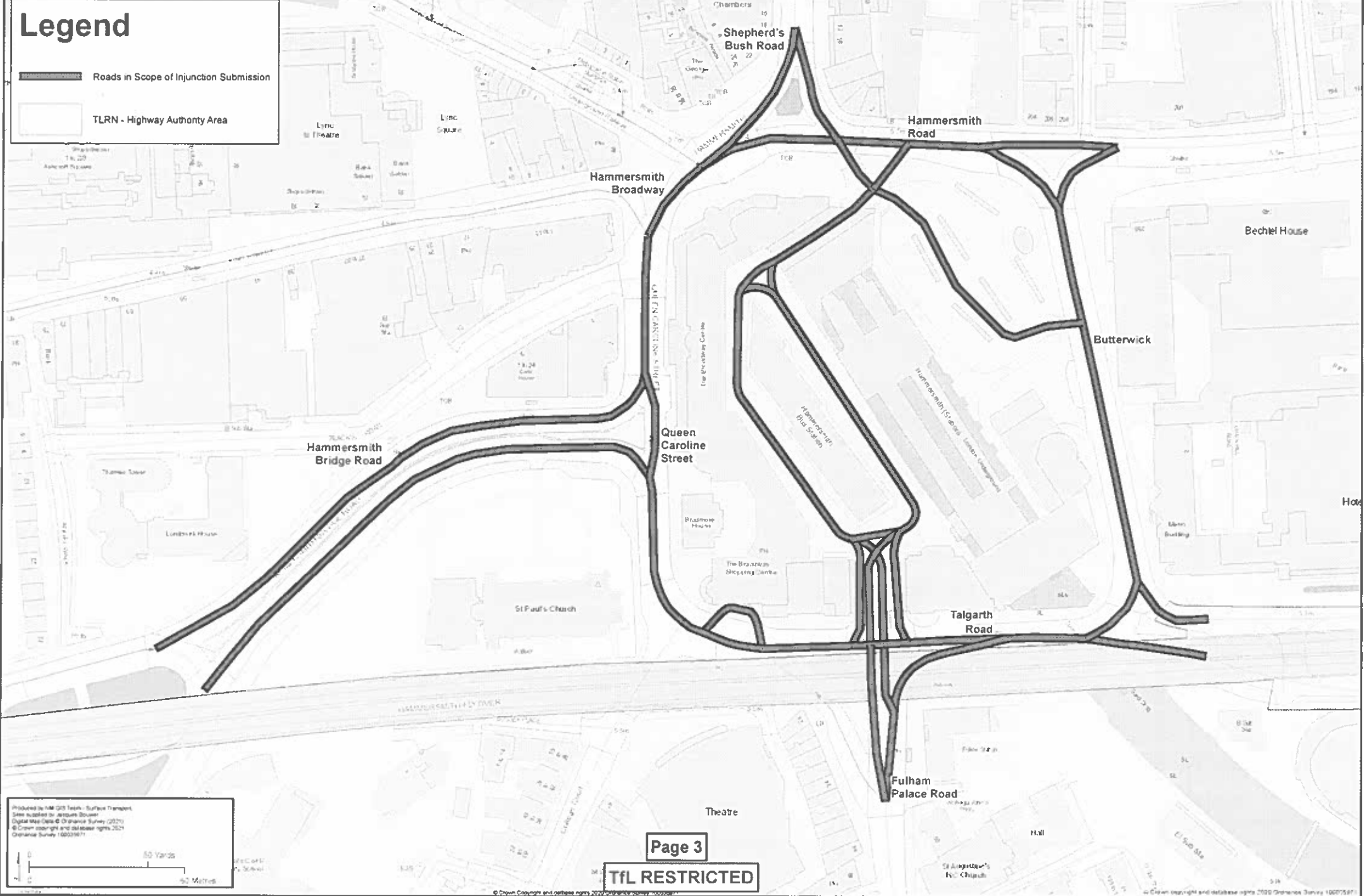


Climate Protest Injunction - Key Areas


Information as of 07 October 2021 - 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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0 50 Yards 50 Metres

Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Hanger Lane Gyrotary 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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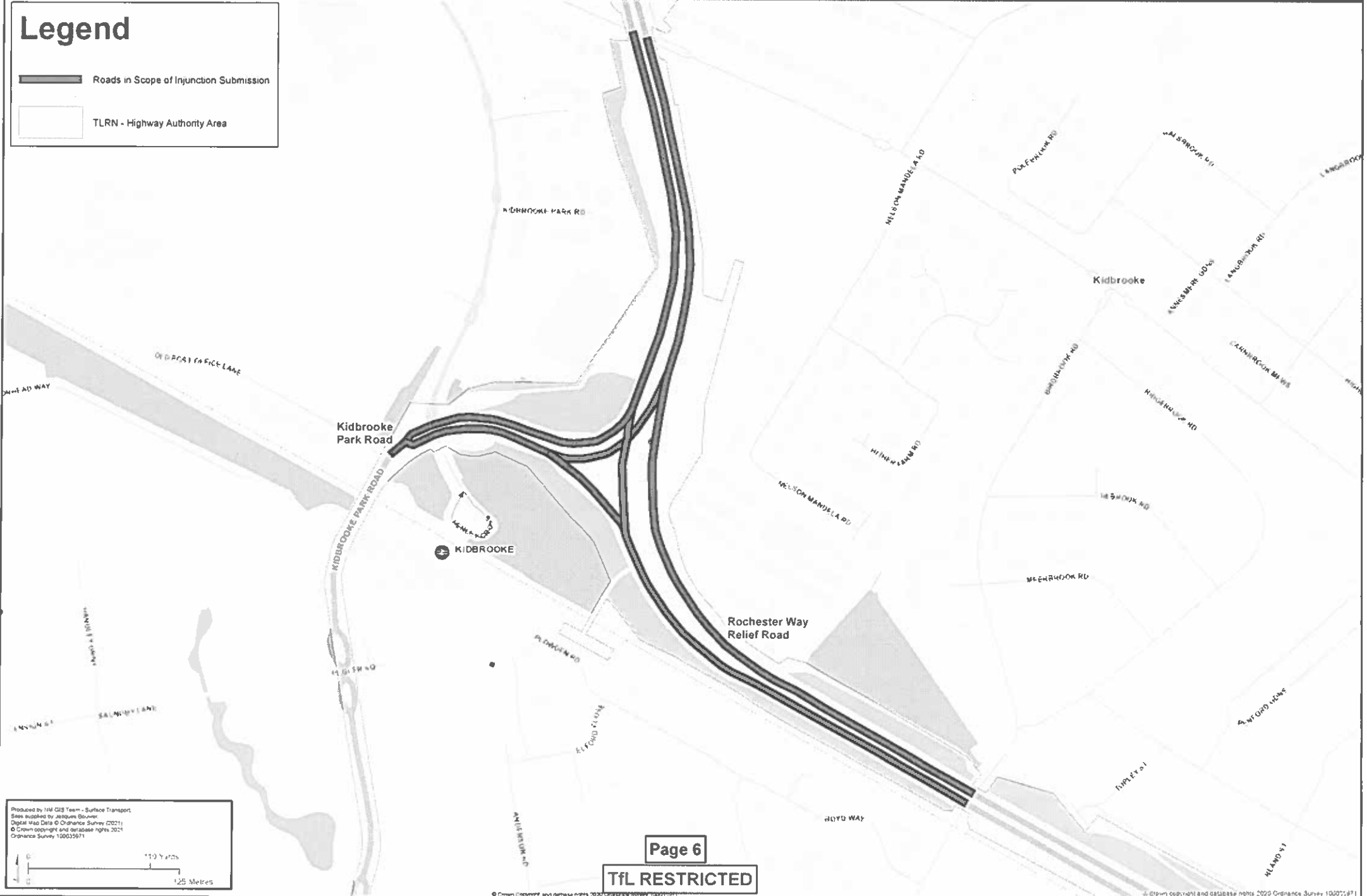


Climate Protest Injunction - Key Areas

Information as of 07 October 2021 - Kidbrooke Interchange

Legend

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





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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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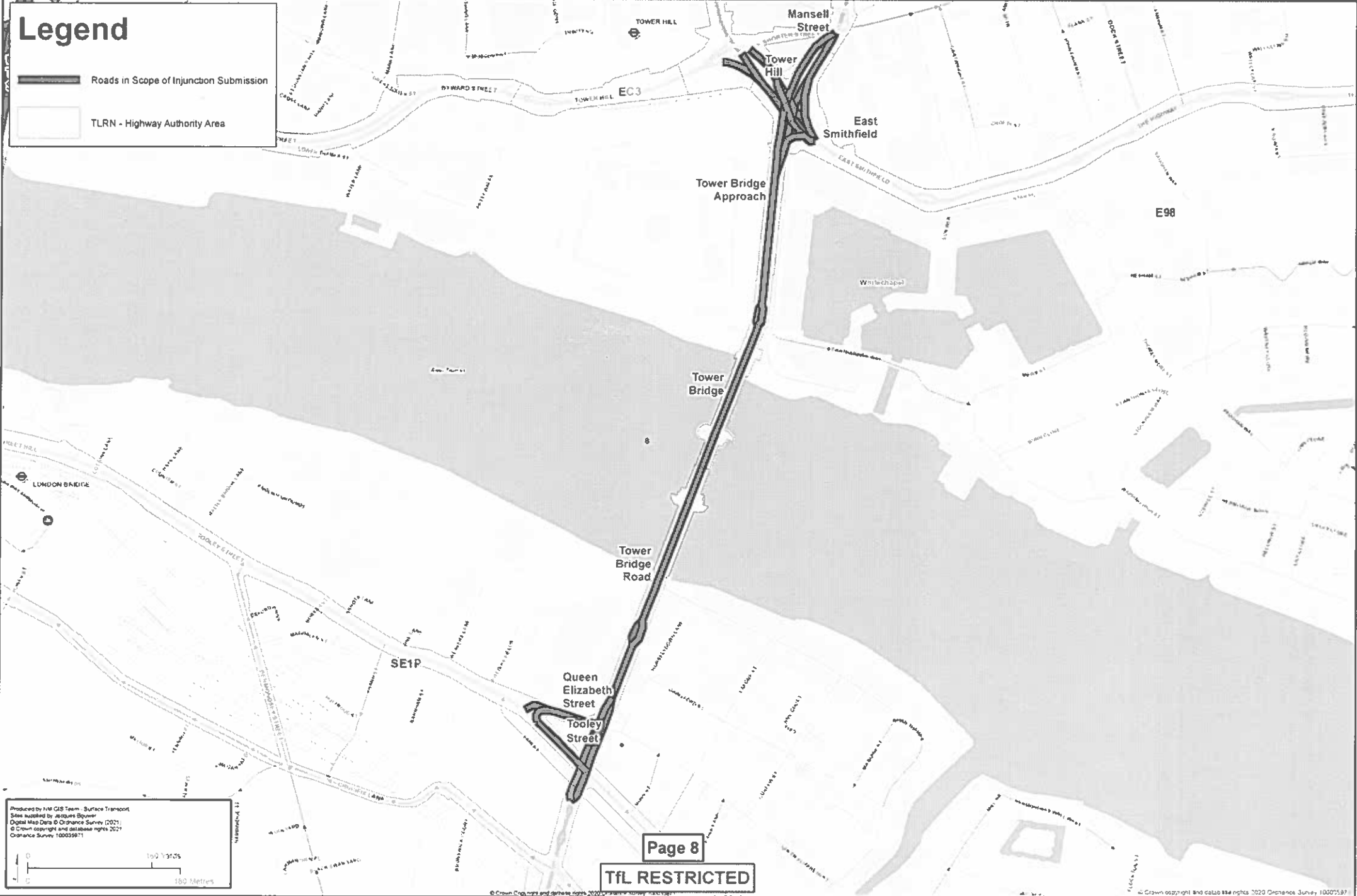
0 100 Yards 100 Metres

Climate Protest Injunction - Key Areas

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

Legend



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

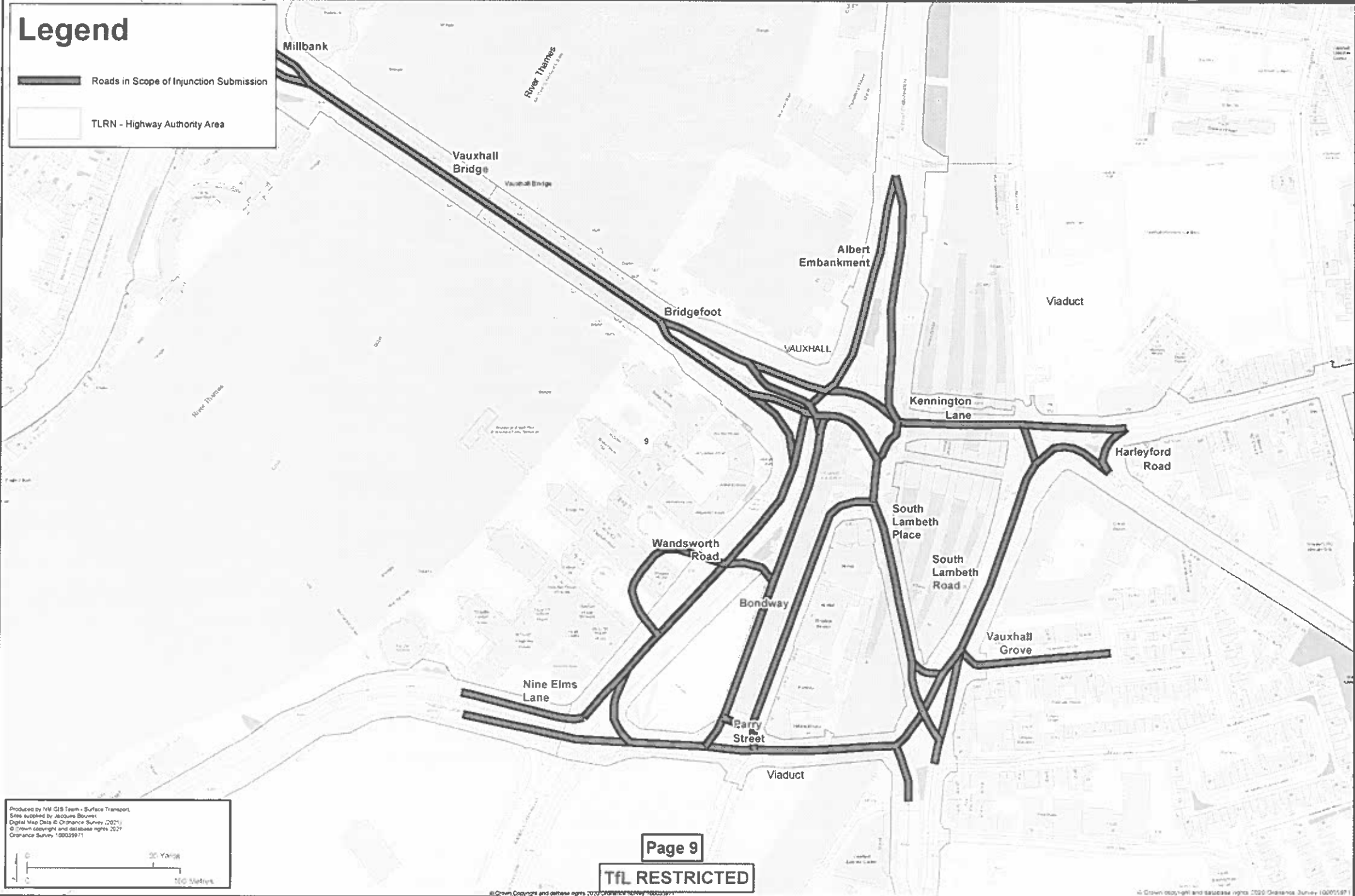


Climate Protest Injunction - Key Areas

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

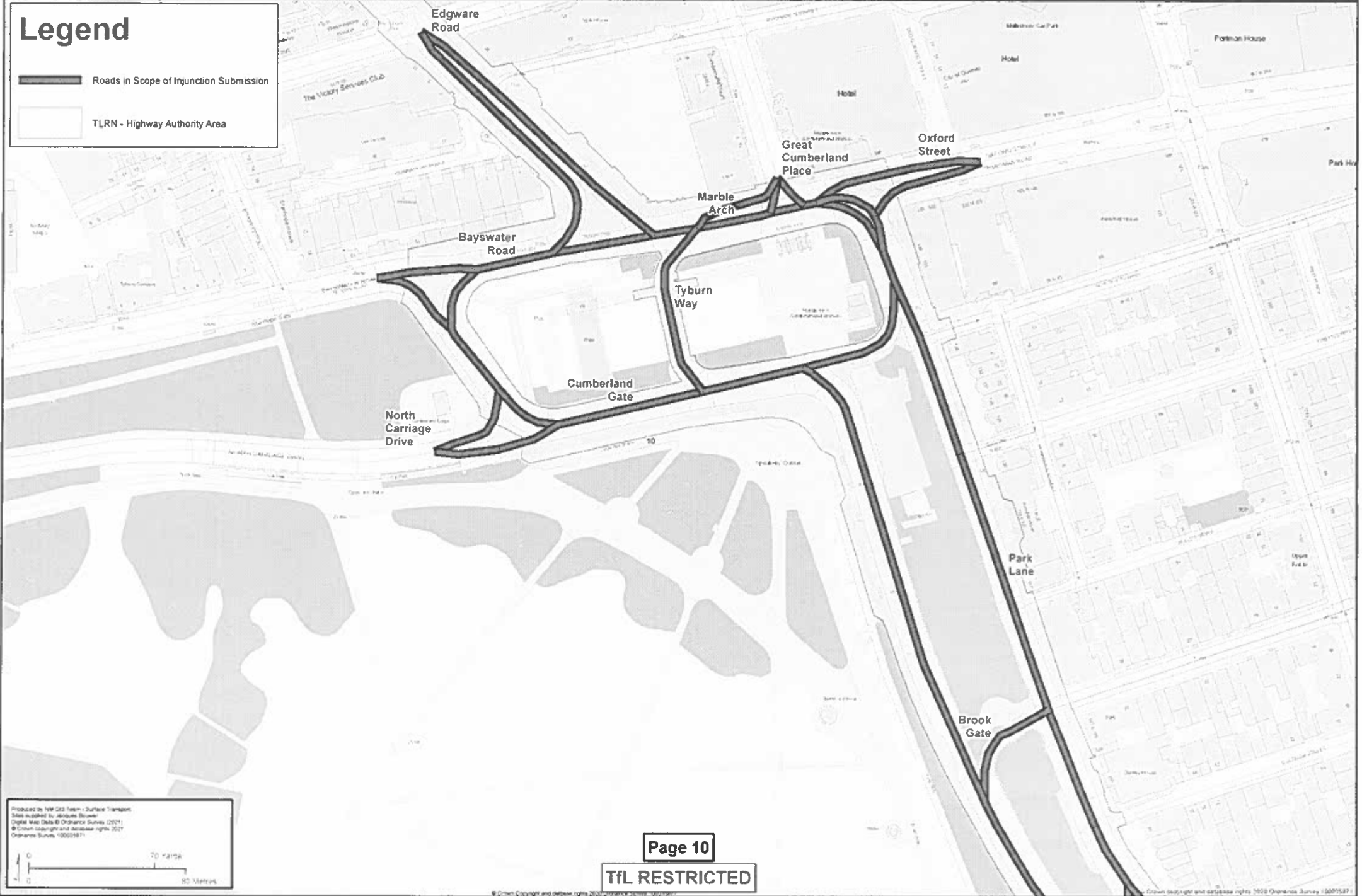


Climate Protest Injunction - Key Areas


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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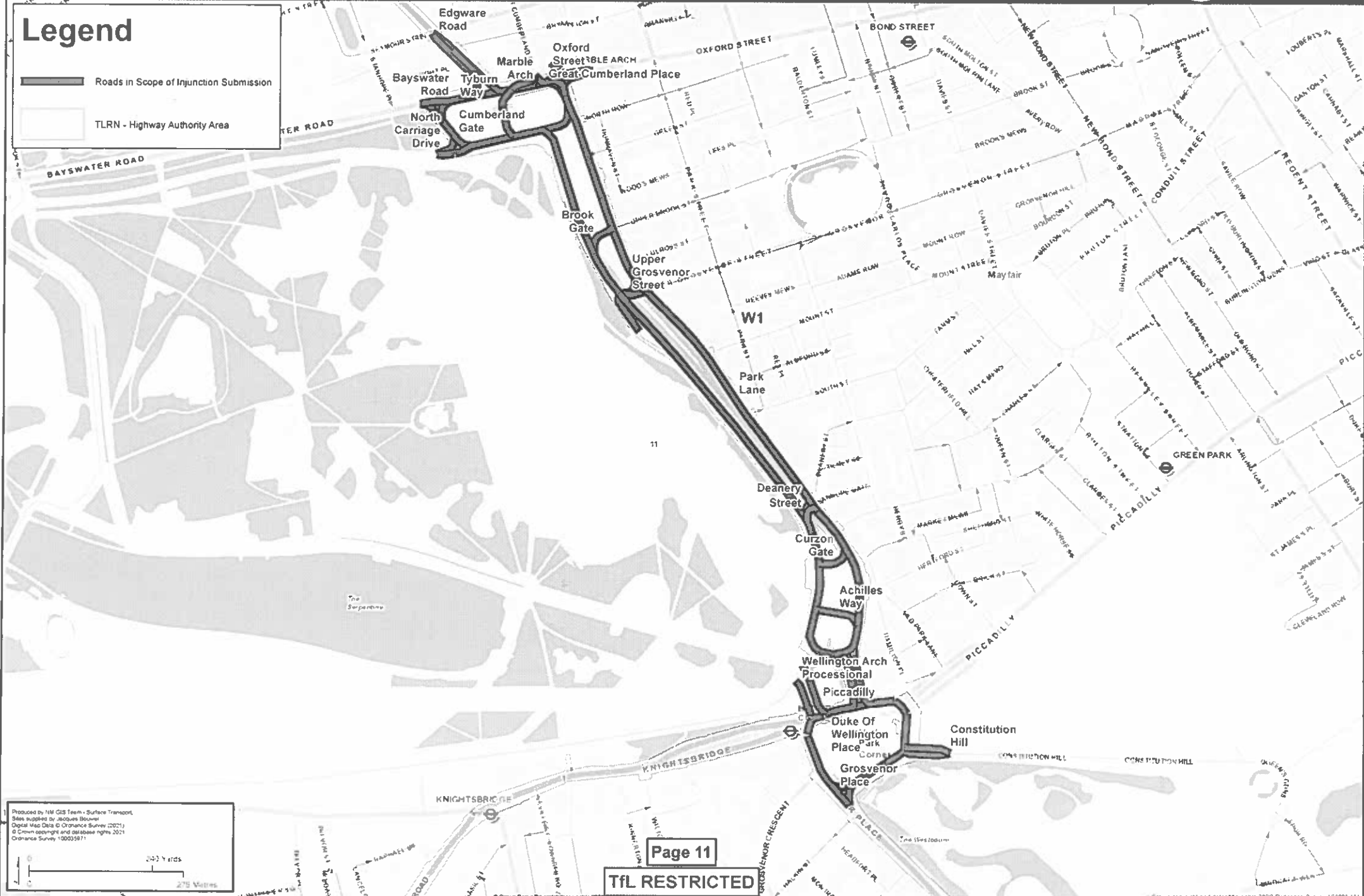
Climate Protest Injunction - Key Areas

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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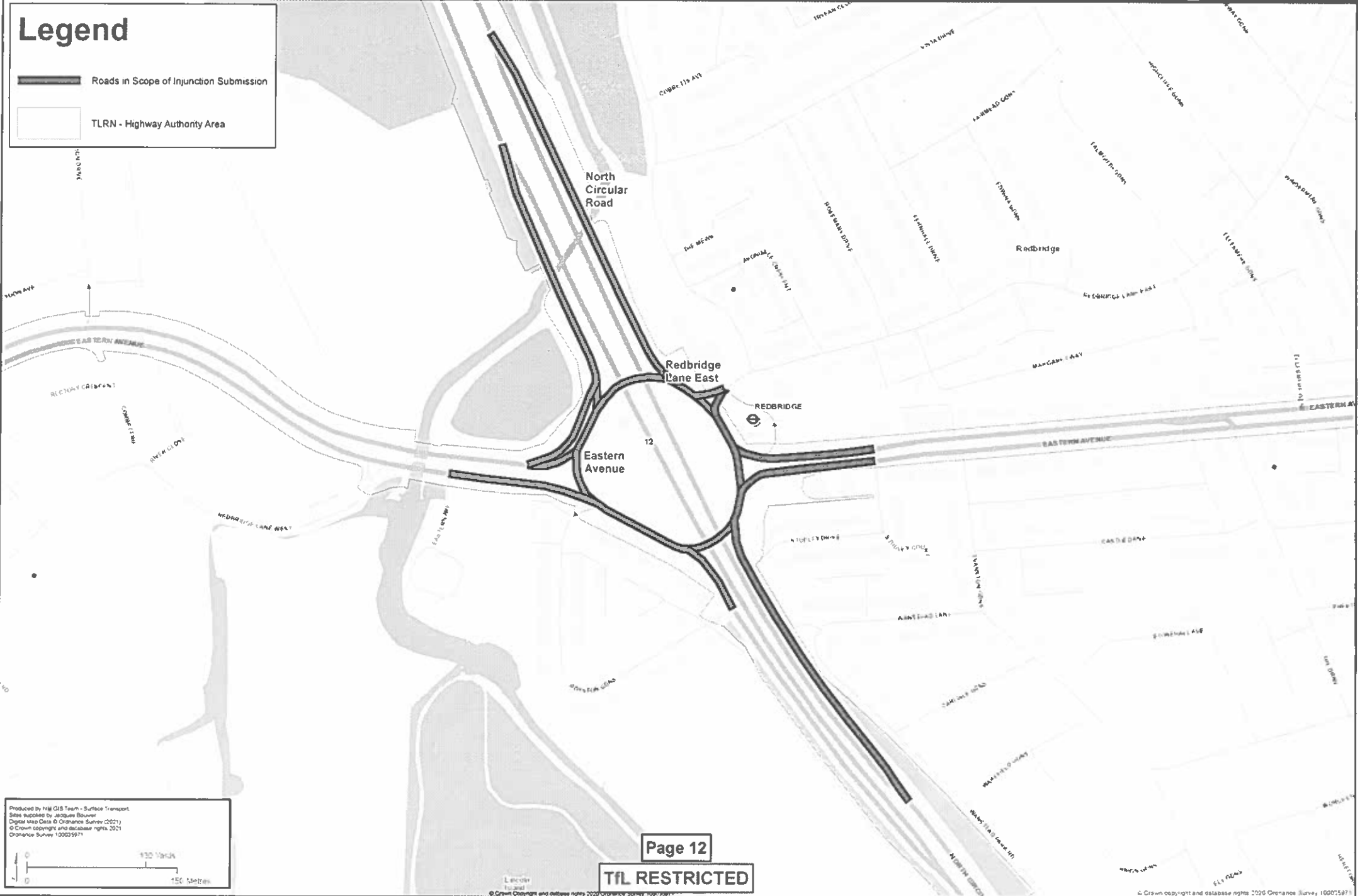
0 200 Yards
0 275 Metres

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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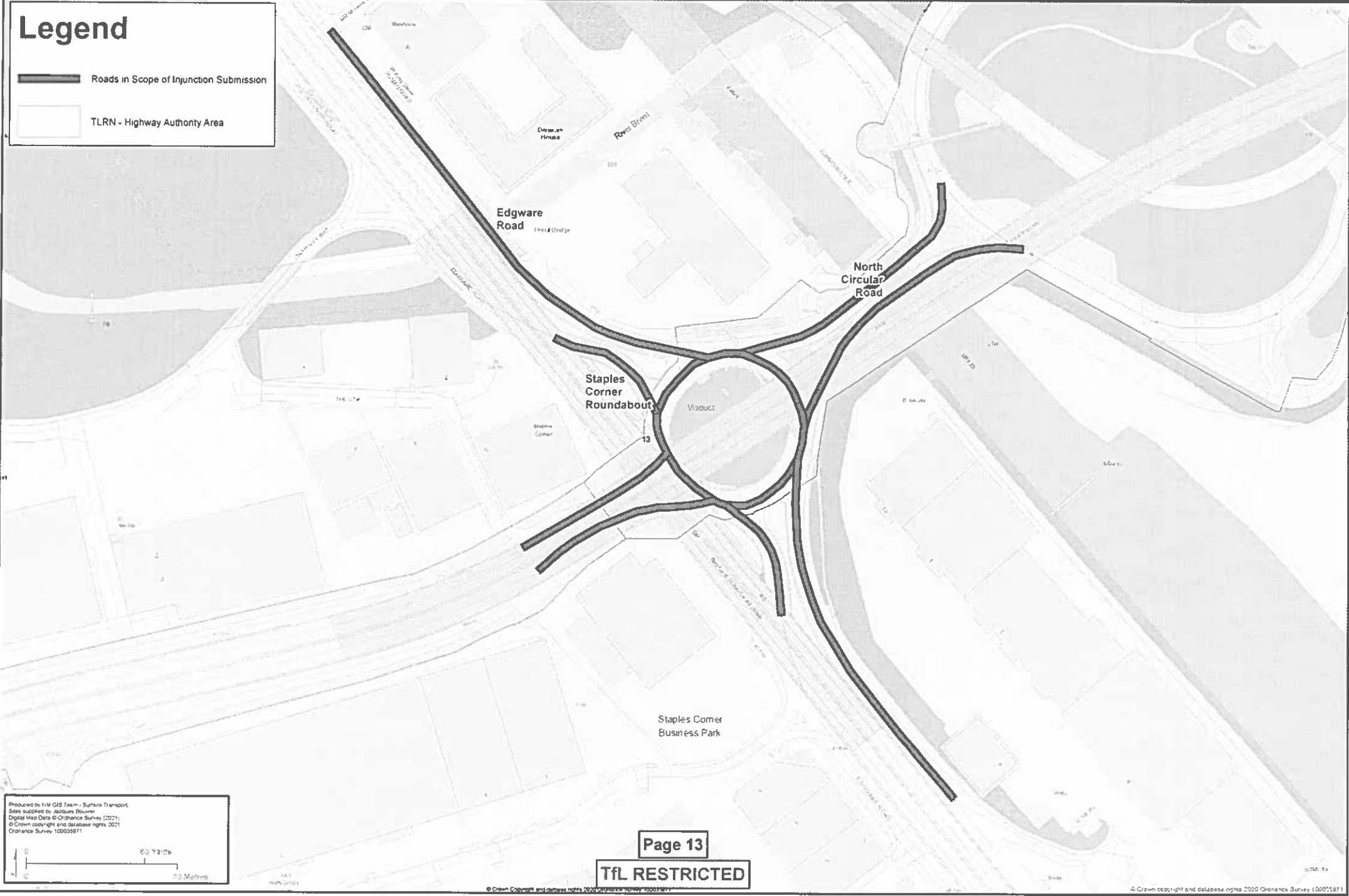
0 150 Metres

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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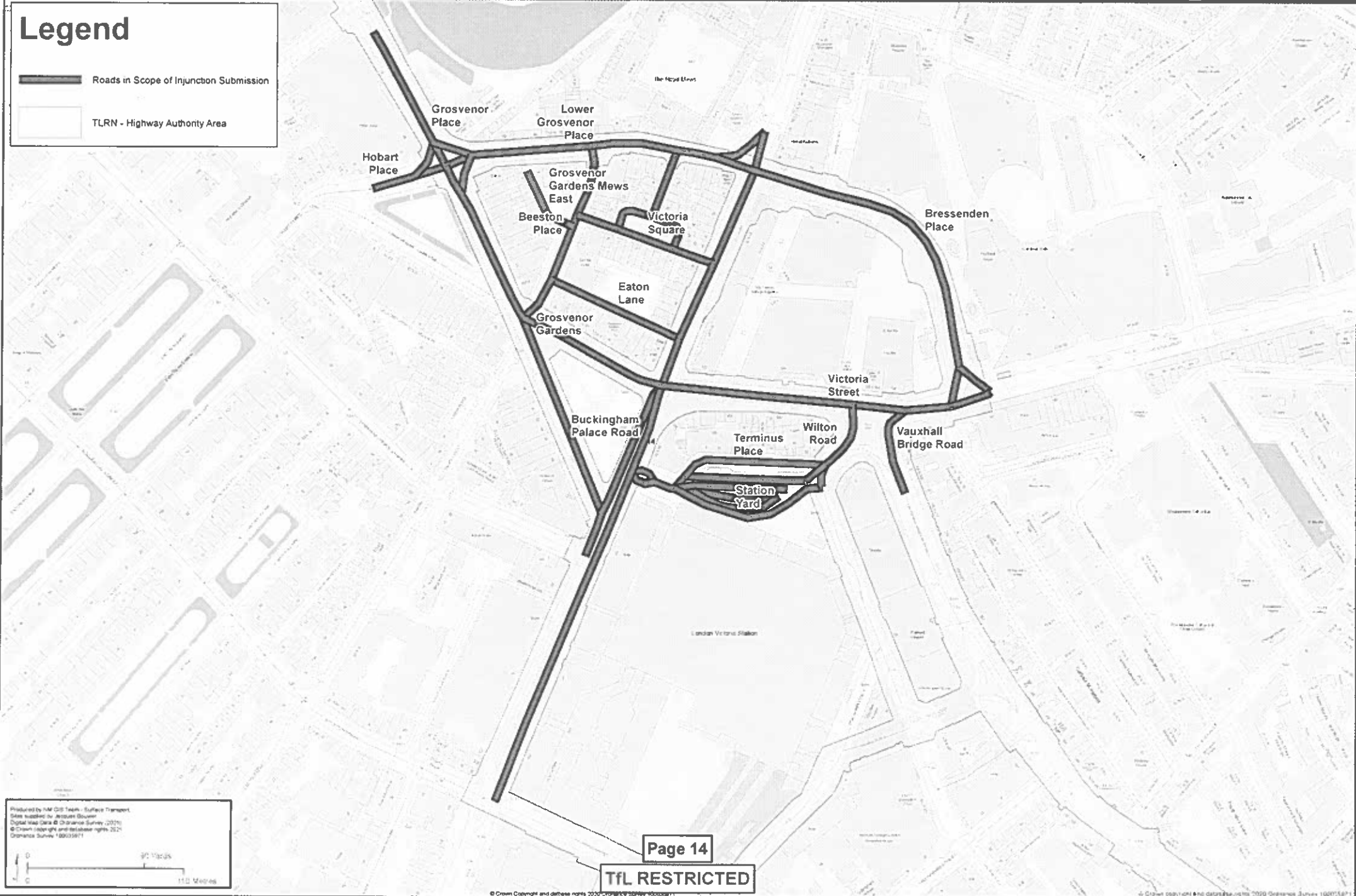


Climate Protest Injunction - Key Areas


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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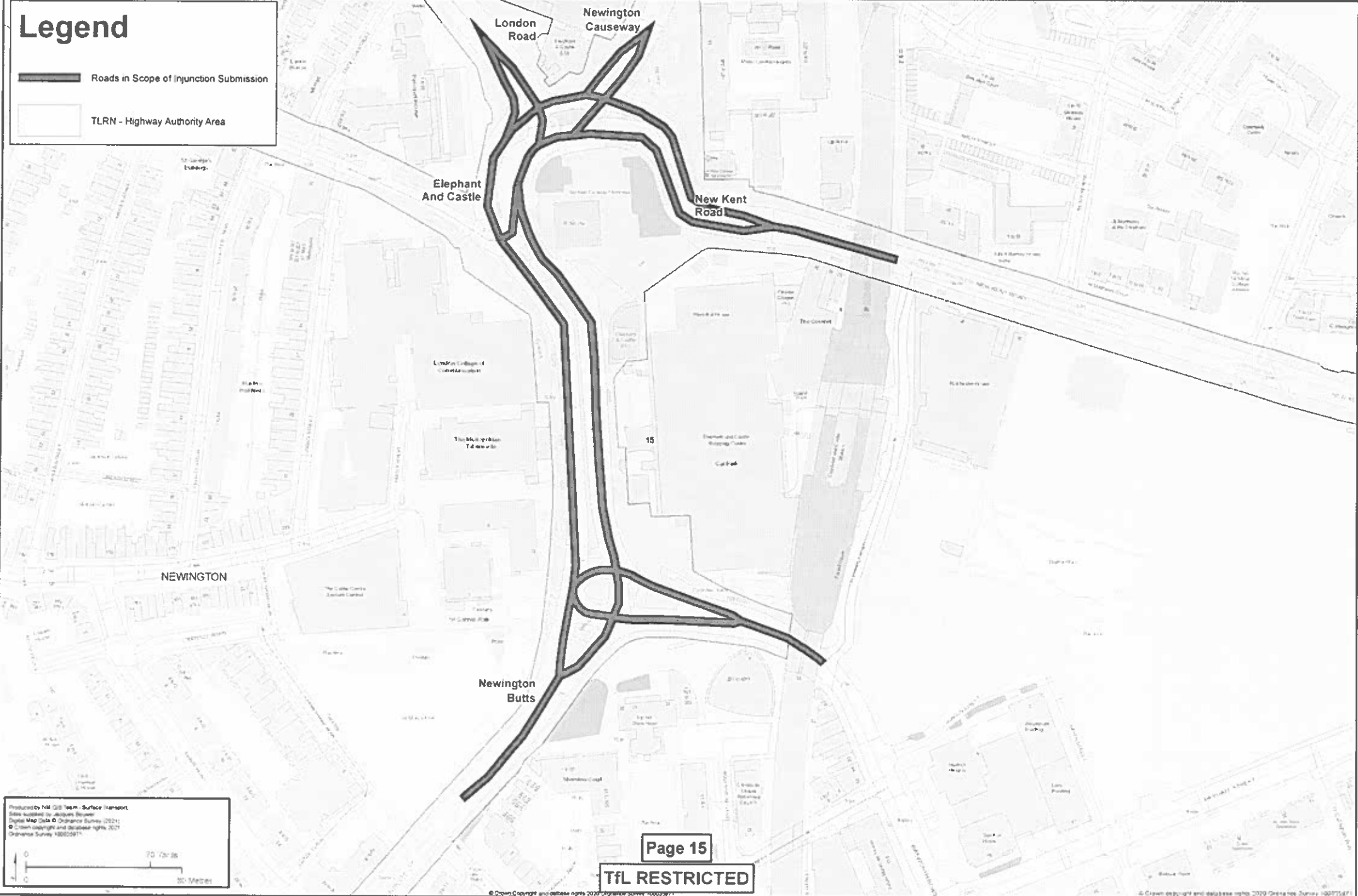


Climate Protest Injunction - Key Areas

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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