

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

**Before: Mr Justice Lavender  
On: 21 September 2021**

**B E T W E E N:**

**NATIONAL HIGHWAYS LIMITED**

Claimant

-and-

**(1) PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING,  
SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE  
FLOW OF TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE  
PURPOSE OF PROTESTING**

Defendants

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**ORDER**

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**PENAL NOTICE**

**IF YOU THE WITHIN NAMED DEFENDANTS 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** the Claimant’s claim in trespass, nuisance and under the Highways Act 1980 by Claim Form dated 21 September 2021 (“the Claim”)

**AND UPON READING** the Claim Form and the supporting evidence

**AND UPON** hearing Michael Fry and Jonathan Welch, Counsel for the Claimant

**AND UPON** the Claimant undertaking to pay the relevant court fees and to provide any witness statement(s) supporting the Claim within 48 hours of the sealing of this Order

**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 endanger, slow, obstruct, or prevent the free flow of traffic onto or along the M25 motorway nor to prevent lawful use of the M25 by any person

**IT IS ORDERED THAT:**

1. For the purposes of this Order, the “M25” means the London Orbital Motorway including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges including the Dartford Crossing and Queen Elizabeth II Bridge, and any apparatus related to that motorway.

**Injunction in force**

2. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 21 March 2022, the Defendants and each of them are forbidden from:

- 2.1 Blocking, endangering, slowing down, preventing, or obstructing the free flow of traffic onto or along or off the M25 for the purposes of protesting.
  - 2.2 Causing damage to the surface of or to any apparatus on or around the M25 including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
  - 2.3 Affixing themselves (“locking on”) to any other person or object on the M25.
  - 2.4 Erecting any structure on the M25.
  - 2.5 Tunnelling in the vicinity of the M25.
  - 2.6 Entering onto the M25 unless in a motor vehicle.
  - 2.7 Abandoning any vehicle or item on the M25 with the intention of causing an obstruction.
  - 2.8 Refusing to leave the area of the M25 when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.
  - 2.9 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 2.1 – 2.8 above.
  - 2.10 Continuing any act prohibited by paragraphs 2.1 – 2.9 above.
3. The Claimant shall:
    - 3.1 Place copies of this Order and the Claim Form on the National Highways and Gov.uk website; and
    - 3.2 Send a copy of this Order and the Claim Form to Insulate Britain’s email address: Insulate Britain [ring2021@protonmail.com](mailto:ring2021@protonmail.com).
  4. For the avoidance of doubt, compliance with paragraph 3 shall not constitute service.

**Further directions**

5. 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).

6. 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.
7. The Claimant has liberty to apply to extend or vary this Order or for further directions.
8. The return date hearing to be listed for 10.30 am on 5 October 2021 in person.
9. Costs reserved.

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

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

FAO Antony Nwanodi  
Government Legal Department,  
102 Petty France, Westminster,  
London SW1H 9GL  
**E: [tony.nwanodi@governmentlegal.gov.uk](mailto:tony.nwanodi@governmentlegal.gov.uk)**  
**T: 020 7210 3424**

**BY THE COURT**

**Dated: 21 September 2021**