

B E T W E E N :

(1) LONDON SOUTHEND AIRPORT COMPANY LIMITED
(2) LONDON SOUTHEND SOLAR LIMITED
(3) THAMES GATEWAY AIRPORT LIMITED

Claimants

-and-

PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHEND AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE AMENDED PARTICULARS OF CLAIM

Defendants

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REVIEW HEARING
HEARING DATE: 22 OCTOBER 2025

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IN THE HIGH COURT OF JUSTICE

Claim No.: KB-2024-002596

KINGS BENCH DIVISION

Before The Honourable M[] Justice []

On: [22 October 2025]

BETWEEN:

- (1) LONDON SOUTHEND AIRPORT COMPANY LIMITED
(2) LONDON SOUTHEND SOLAR LIMITED
(3) THAMES GATEWAY AIRPORT LIMITED**

Claimants

-and-

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN
(WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHEND
AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE
AMENDED PARTICULARS OF CLAIM**

Defendants

ORDER

PENAL NOTICE

**IF YOU, THE 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 OR PERSONS UNKNOWN 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 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.

RECITALS

UPON the injunction made by the Order dated 14 August 2024 of Farbey J (“**the Injunction**”)

AND UPON the Claimants’ application by Application Notice dated 13 August 2025 for this hearing to review the Injunction

AND UPON the review hearing which took place on [22 October] 2025 (as listed pursuant to paragraph 3 of the Injunction)

AND UPON READING the witness evidence filed by the Claimants in support of the continuation of the Injunction, in the form of: (i) the First Witness Statement of Philip Keith Spencer; and [] both dated []

AND UPON HEARING [Mr Tom Roscoe], Counsel for the Claimants [and there being no other attendance]

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or setting aside of the relief granted in the Injunction

IT IS ORDERED THAT:

INJUNCTION

1. The Injunction shall remain in full force and effect [subject to the amendment referred to in paragraph 2 below].
2. [Paragraph 3 of the Injunction is amended so as to read:
 3. *The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court’s list) with a time estimate of 1 ½ hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of this Order (or as the case may*

be the anniversary of the latest annual review) unless, not less than 28 days before then, the Claimants have contacted the Court requesting the review hearing be listed.]

3. The Court will provide sealed copies of this order to the Claimants' solicitors for service or notification in accordance with paragraphs 9 to 13 of the Injunction.

Dated: [] 2025

Service:

The Court provided sealed copies of this order to the serving party:

Bryan Cave Leighton Paisner

Governor's House

5 Laurence Pountney Hill

London

EC4R 0BR

Akhil.Markanday@bclplaw.com

Phil.Spencer@bclplaw.com

Solicitors for the Claimants



Claim Form

In the High Court of Justice
King's Bench Division

Fee Account no. PBA0076972

Help with Fees -
Ref no.
(if applicable)

H W F - - - - -

Amended pursuant to the Order of Mrs Justice Farbey dated 14 August 2024

You may be able to issue your claim online which may save time and money. Go to www.moneyclaim.gov.uk to find out more.

For court use only

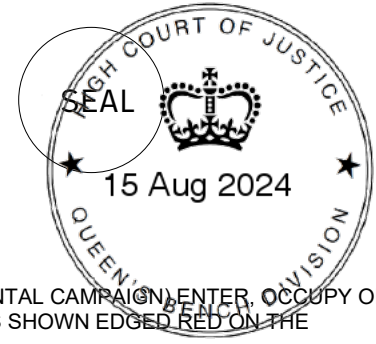
Claim no. KB-2024-002596

Issue date

Claimant(s) name(s) and address(es) including postcode

- (1) London Southend Airport Company Limited (company no. 02881745)
- (2) London Southend Solar Limited (company no. 09225106)
- (3) Thames Gateway Airport Limited (company no. 05022155)

London Southend Airport, Southend-On-Sea, Essex, United Kingdom, SS2 6YF



Defendant(s) name and address(es) including postcode

PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHEND AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE **AMENDED** PARTICULARS OF CLAIM

KB-2024-002596

DATE OF ISSUE

12/08/2024

Brief details of claim

The Claimants seek an injunction to restrain the Defendants from acts of trespass or nuisance on the Claimants' land, as more particularly described in the **Amended** Particulars of Claim.

Value

This is a non-monetary claim

Defendant's
name and
address
for service
including
postcode

N/A

£

Amount claimed	
Court fee	626
Legal representative's costs	TBA
Total amount	

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.

KB-2024-002596

You must indicate your preferred County Court Hearing Centre for hearings here
(see notes for guidance)

King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL

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

Does, or will, your claim include any issues under the Human Rights Act 1998?

☒ Yes

☐ No

Claim no.

KB-2024-002596

Particulars of Claim

☒ attached

☐ to follow

Statement of truth

Note: you are reminded that a copy of this claim form must be served on all other parties.

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 this claim form and any attached sheets are true.
- ☒ **The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

Signature

DocuSigned by:
Phil Spencer
656A85CC3CB44E1...

- ☐ Claimant
- ☐ Litigation friend (where claimant is a child or protected party)
- ☒ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
15	0 8	2 0 2 4

Full name

Philip Keith Spencer

Name of claimant's legal representative's firm

Bryan Cave Leighton Paisner LLP

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

Senior Associate

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

Governor's House

Second line of address

5 Laurence Pountney Hill

Town or city

London

County (optional)

Postcode

E C 4 R 0 B R

If applicable

Phone number

020 3400 3119

DX number

Your Ref.

AMRK/PSPE/3014634.1

Email

phil.spencer@bclplaw.com

Amended pursuant to the Order of Mrs Justice Farbey dated 14 August 2024

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

Claim No: KB-2024-002596

BETWEEN:

- (1) LONDON SOUTHEND AIRPORT COMPANY LIMITED**
(2) LONDON SOUTHEND SOLAR LIMITED
(3) THAMES GATEWAY AIRPORT LIMITED

Claimants

-and-

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN
(WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHEND
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AMENDED PARTICULARS OF CLAIM**

Defendants

AMENDED PARTICULARS OF CLAIM

THE CLAIMANTS

1. The First Claimant is the operator of 'London Southend Airport', Southend-On-Sea, Essex ("the Airport"), as shown edged red on Plan A annexed to the **Amended** Particulars of Claim ("Plan A"). The Second Claimant and the Third Claimant are subsidiary companies of the First Claimant who also own interests in the land comprising the Airport and as such join this claim given their immediate right to possession of the areas further explained below.
2. As the operator of the Airport:

- a. The First Claimant holds a certificate for operation of the Airport issued by the UK Civil Aviation Authority (“CAA”) dated 13 June 2016, with reference number UK: EGMC – 001; and
- b. The First Claimant has made the ‘London Southend Airport – Byelaws 2021’ (“the Byelaws”) pursuant to section 63 and 64 of the Airports Act 1986 regulating the use and operation of the Airport and the conduct of all persons while within the Airport, which came into force on 18 April 2021.

THE LAND TO WHICH THE CLAIM RELATES

3. The land and property to which the Claim relates is the Airport. It does not include residential property.
4. The Claimants are the freehold and leasehold owners of the parcels of land that comprise the Airport pursuant to the titles listed in Schedule 1 to the Amended Particulars of Claim.
5. The Claimants have granted various leases and licences in respect of certain parts of the Airport. The areas in respect of which the Claimants have a right to immediate possession, pursuant either to freehold ownership or immediate leasehold interests, are shown shaded yellow on Plan A (excluding the areas hatched blue and shaded orange) (“the Yellow Land”).
6. As the operators of the Airport, as set out in Paragraphs 1 and 2 above, the Claimants between them still retain sufficient control over those parts of the Airport in respect of which they have granted leases and licences (including under the Byelaws), to entitle them to exercise control over the Airport in relation to any persons trespassing thereon.

THE DEFENDANTS

7. The Defendants are environmental activists associated with the Just Stop Oil campaign (or other environmental campaigns) who have committed to engaging in campaign of disruptive direct action at airports across the United Kingdom.

8. At a meeting in Birmingham in early March 2024, the environmental campaigners associated with the ‘Just Stop Oil’ campaign discussed the taking of direct action at airports across the UK in the summer of 2024.
9. The homepage of the website of Just Stop Oil emphasises the plans to target action on airports during the summer of 2024 and a video was published on 5 May 2024 at <https://www.youtube.com/watch?v=tbvYQFGAY48> which discloses an intention to disrupt airports in the UK in the summer months of 2024. Furthermore, multiple messages sent from the official Instagram account of Just Stop Oil demonstrate how campaigners associated with Just Stop Oil intend to target airports by direct action activities.
10. In support of their aim to disrupt airports in the summer months, two Just Stop Oil fundraising pages have been set up, namely:
 - a. “Fund Radical Climate Action — Just Stop Oil | Chuffed | Non-profit charity and social enterprise fundraising” (which has raised £165,948 as of 8 August 2024) and states:

“We’re escalating our campaign this summer to take action at airports.”
 - b. “Just Stop Oil: Summer Actions | Chuffed | Non-profit charity and social enterprise fundraising” (which has raised £24,650 as of 8 August 2024) and states:

“Just Stop Oil: Summer actions. This summer, we continue in resistance.

We’ll be taking action at sites of key importance to the fossil fuel industry; super-polluting airports.”
11. There has also been extensive media coverage of the Just Stop Oil plans and the danger they pose. A Daily Mail online article entitled ‘*Exclusive Revealed: The eco mob plot to ruin the summer holidays with activists planning to disrupt flights by gluing themselves to major airport runways*’ states that Just Stop Oil have advocated the following means of protest:

- *“Cutting through fences and gluing themselves to runway tarmac;*
- *Cycling in circles on runways*
- *Climbing on to planes to prevent them from taking off*
- *Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.”*

12. Since the above threats, numerous incidents have been reported at multiple airports around England, as further detailed in the First Witness Statement of Akhil Markanday.

THE POTENTIAL EFFECTS OF THE THREATENED DIRECT ACTION

13. In summary, the potential risks and/or effects of the apprehended activities would include the following:

- a. A real risk to life and limb;
- b. Significant disruption to passengers;
- c. Significant disruption to airlines;
- d. Significant impact on businesses and the wider local economy;
- e. Consequential effects on the infrastructure network around the Airport;
- f. The need for deployment of additional Police resources at the Airport;
- g. Substantial economic losses to the Claimants.

THE THREATENED ACTS OF TRESPASS AND/OR NUISANCE

14. By reason of the foregoing, the Claimants apprehend that unless restrained by this Honourable Court, there is a serious and imminent risk that the Defendants will commit acts of trespass and nuisance by way of ‘direct action’ activities, in respect of and in connection with which they have no permission or licence to enter upon the Airport.

15. Members of the public have an implied consent to enter the Airport for air-travel and directly related purposes. All persons entering the Airport are subject to the Byelaws which regulate the use and operation of the Airport and the conduct of all persons while within the airport

16. By Byelaw 4(12), no person shall remain on the Airport after having been requested to leave, such request arising where that person is causing a disturbance or is about to commit an offence (including a breach of a Byelaw).
17. By Byelaw 4(16) of the Byelaws, no person shall intentionally obstruct or interfere with the proper use of the Airport or with any person acting in the execution of his duty in relation to the operation of the Airport.
18. By Byelaw 4(22) of the Byelaws, no person shall organise or take part in any demonstration, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the safety of passengers or persons using the Airport.
19. Accordingly, although members of the public have an implied consent to enter the Airport for the purpose of travelling by air and for directly related purposes, they do not have permission to enter or remain or occupy any land thereon for the purposes of:
 - a. Causing a disturbance or being about to commit an offence, including breach of a Byelaw (Byelaw 4(12)); or
 - b. Intentionally obstructing or interfering with the proper use of the Airport (Byelaw 4(16)).
 - c. Organising or taking part in any demonstration, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the safety of passengers or persons using the Airport (Byelaw 4(22)).
20. Further and/or alternatively, the threatened acts referred to above would amount to a nuisance, in that they would give rise to an unreasonable interference with the use and operation of the Airport and/or the Claimants' enjoyment of their proprietary rights in respect of the Airport premises summarised at paragraph 4 above and Schedule 1 below.
21. Further and/or alternatively, the nuisance referred to at Paragraph 19 above would also constitute a public nuisance in that the acts referred to above would substantially affect members of the public, including, but not limited, to persons wishing to use the Airport for the purpose of air travel as well as the Claimants. As such, the nuisance would 'materially

affect the reasonable comfort and convenience of a class of His Majesty's subjects' and the Claimants would suffer 'special damage' in respect thereof given the loss and damage referred to in Paragraph 13 above would constitute foreseeable and substantial damage over and above that suffered by the public at large.

22. Accordingly, as the operator of the Airport and by reason of the matters set out in Paragraph 6 above, the Claimants seek injunctive relief restraining the apprehended acts of trespass and/or nuisance in respect of the Airport.

HUMAN RIGHTS

23. Reliance by the Defendants on rights of freedom of expression and/or assembly within Articles 10 and/or 11 of the European Convention of Human Rights would not provide a defence in the particular circumstances of this claim.

AND THE CLAIMANTS CLAIM

- (1) An order that the Defendants must not, without the consent of the Claimants, enter, occupy or remain upon any part of the Airport;
- (2) Further or other relief as the Court thinks fit;
- (3) Costs.

TOM ROSCOE
TOM ROSCOE
Wilberforce Chambers

Statement of Truth

The Claimants believe that the facts stated in this Amended particulars of claim are true. The Claimants understand that proceedings for contempt of court may be brought against anyone 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 am duly authorised by the Claimants to sign this statement.

DocuSigned by:

.....
656A85CC3CB44E1.....

Philip Keith Spencer

Senior Associate, Bryan Cave Leighton Paisner LLP

9 15 August 2024

SCHEDULE 1**TITLES OWNED BY THE CLAIMANTS****The First Claimant**

Title	Tenure	Description
EX468707	Freehold	land on the west side of Southend Road, Rochford, SS4 1HQ
EX573524	Freehold	2, Eastwoodbury Cottages, Eastwoodbury Lane, Southend-On-Sea, SS2 6UR
EX578232	Freehold	20, Smallholdings, Eastwoodbury Lane, Southend-On-Sea, SS2 6UP
EX589308	Freehold	19 Smallholdings, Eastwoodbury Lane, Southend-on-Sea, SS2 6UP
EX590259	Freehold	4, Eastwoodbury Cottages, Eastwoodbury Lane, Southend-On-Sea, SS2 6UR
EX596136	Freehold	1, Eastwoodbury Cottages, Eastwoodbury Lane, Southend-On-Sea, SS2 6UR
EX604152	Freehold	3 Eastwoodbury Cottages, Eastwoodbury Lane, Southend-on-Sea, SS2 6UR
EX683340	Freehold	land on the west side of Southend Road, Rochford
EX216541	Leasehold	land lying to the east of Aviation Way, Southend-on-Sea
EX515913	Leasehold	Southend Airport, Eastwoodbury Crescent, Southend-on-Sea
EX870383	Leasehold	Land lying to the west of Southend Road, Rochford
EX880489	Leasehold	land on the south side of Eastwoodbury Lane, Southend-On-Sea
Unregistered	Leasehold	land to the North side of Sutton Road, Rochford let from Sally Ann Stokes to the First Claimant by a lease dated 17 February 2012 for a term of 25 years commencing 1 February 2012.

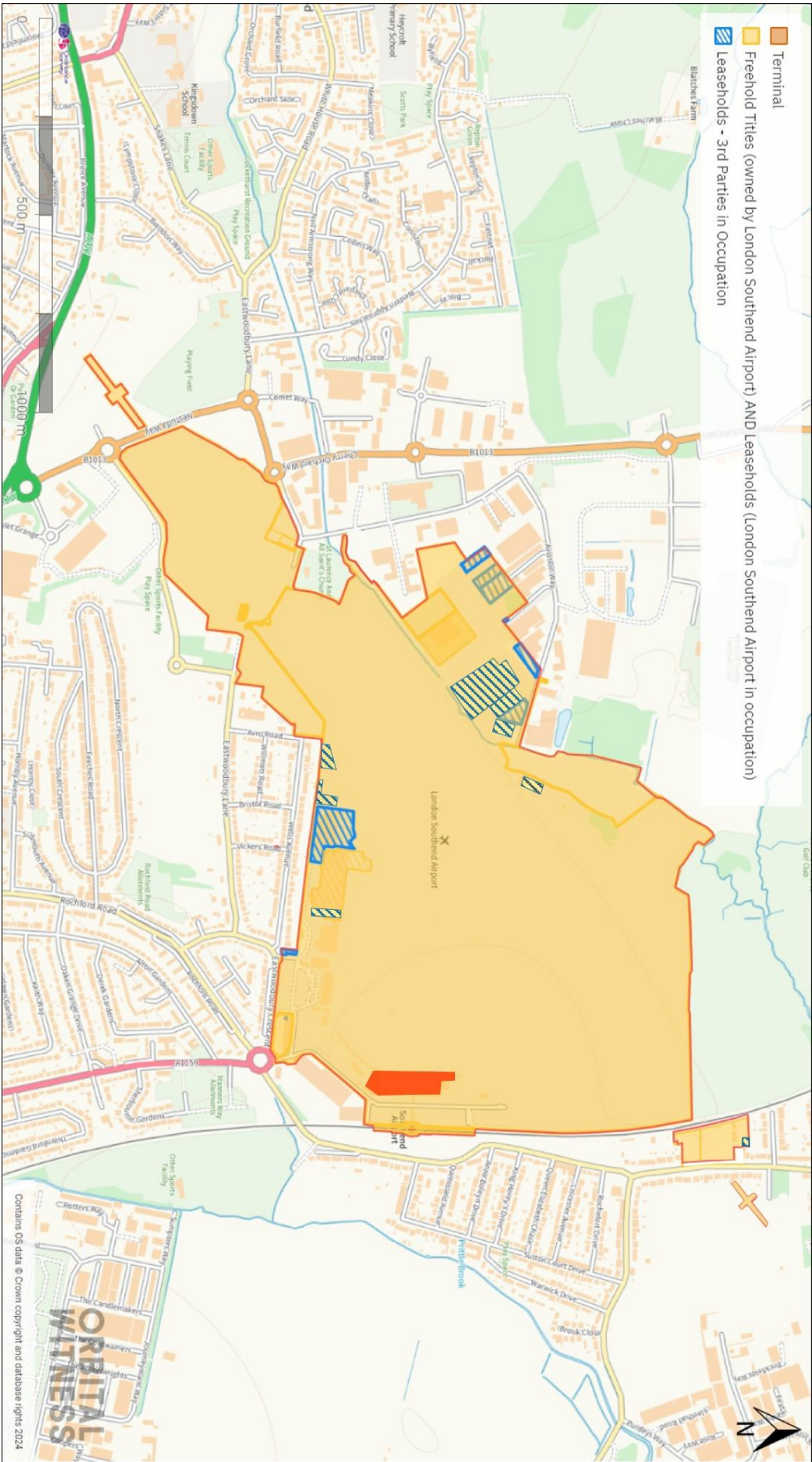
The Second Claimant

Title	Tenure	Description
EX930812	Leasehold	Land at Aviation Way, Southend Airport, Southend-On-Sea

The Third Claimant

Title	Tenure	Description
EX969926	Leasehold	Holiday Inn Hotel, London Southend Airport

PLAN A



IN THE HIGH COURT OF JUSTICE

Claim No.: KB-2024-002596

KINGS BENCH DIVISION

Before: The Honourable Mrs Justice Farbey

On: 14 August 2024

BETWEEN:



**(1) LONDON SOUTHEAST AIRPORT COMPANY LIMITED
(2) LONDON SOUTHEAST SOLAR LIMITED
(3) THAMES GATEWAY AIRPORT LIMITED**

Claimants

-and-

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN
(WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHEAST
AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE
AMENDED PARTICULARS OF CLAIM (AND ALSO ATTACHED TO THIS
ORDER)**

Defendants

ORDER

PENAL NOTICE

**IF YOU THE WITHIN DEFENDANTS OR 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 OR PERSONS UNKNOWN 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 AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it 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.

RECITALS

UPON the Claimants having issued this Claim by a Claim Form dated 12 August 2024 (amended 14 August 2024)

AND UPON hearing the Claimants' without notice application for an interim injunction by Application Notice dated 12 August 2024

AND UPON READING the Witness Statements of Akhil Markanday dated 9 August 2024 and Marc Taylor dated 9 August 2024

AND UPON HEARING Tom Roscoe, Counsel for the Claimants

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 1 to this Order

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest for them to designate an area for that purpose at London Southend Airport (as more particularly described in paragraph 1 below) should be made by email to media@londonouthendairport.com

IT IS ORDERED THAT:

INJUNCTION

1. Until 14 August 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the prior consent of the Claimants, enter, occupy or remain on London Southend Airport, Southend-On-Sea, Essex, as shown edged red on the plan annexed to this Order at Schedule 2 ("**Plan A**") in connection with Just Stop Oil or other environmental, climate or fossil-fuel campaign and/or protest.
2. In respect of paragraph 1, the Defendants must not: (a) do the prohibited acts himself/herself/themselves in any other way; or (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

3. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1 ½ hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of this Order (or as the case may be the anniversary of the latest annual review) unless, before then, the Claimants have applied for the review to take place.

VARIATION

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person, but they must first give the Claimants' solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 48 hours in advance of any hearing.
5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimants have liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

7. Pursuant to the guidance of the Supreme Court in *Wolverhampton CC v London Gypsies & Travellers* [2023] UKSC 47 ("**Wolverhampton**")¹, the Amended Claim Form, Amended Particulars of Claim, Application Notice, evidence in support and a Note of the Hearing on 14 August 2024 will be notified to the Defendants by the Claimants carrying out each of the following steps:

- 7.1 Uploading a copy on to the following website:
<http://londonsouthendairport.com/corporate/injunction>

¹ A copy of which, together with a "Press Summary", can be found at:
<https://www.supremecourt.uk/cases/uksc-2022-0046.html>

- 7.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made and that the documents can be found at the website referred to above.
 - 7.3 Either affixing a notice at the locations shown marked with a green or purple dot on the second plan attached to this Order at Schedule 4 (“Plan B”) setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 8.4 below.
8. Pursuant to the guidance in *Wolverhampton*, this Order shall be notified to the Defendants by the Claimants carrying out each of the following steps:
 - 8.1 Uploading a copy of the Order on to the following website:
<http://londonsthendairport.com/corporate/injunction>
 - 8.2 Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
 - 8.3 Affixing a copy of the Order in A4 size in a clear plastic envelope at each of the locations shown with a green or purple dot on Plan B.
 - 8.4 Affixing warning notices of A2 size at those locations marked with a green or purple dot on Plan B, substantially in the form of the notice at Schedule 5.
9. Pursuant to the guidance in *Wolverhampton*, notification to the Defendants of any further applications shall be effected by the Claimants carrying out each of the following steps:
 - 9.1 Uploading a copy of the application on to the following website:
<http://londonsthendairport.com/corporate/injunction>
 - 9.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
 - 9.3 Affixing a notice at these locations marked with a green or purple dot on Plan B stating that the application has been made and where it can be accessed in hard copy and online.

10. Pursuant to the guidance in *Wolverhampton*, notification of any further documents to the Defendants may be effected by carrying out the steps set out in paragraphs 9.1 and 9.2 only.
11. In respect of paragraphs 7 to 10 above:
 - 11.1 pursuant to CPR rr. 6.15, 6.27 and 81.4(2)(c) & (d), the taking of the steps set out at that paragraphs shall amount to good and proper service and effective notification of the Claim, the Order and any future application (respectively), and personal service of those documents is dispensed with; and
 - 11.2 service of documents under each of those paragraph will be deemed to have taken place on the date and at the time at which all the relevant steps have been carried out, and shall be verified by a Certificate of Service to be filed by the Claimants.
12. For the avoidance of doubt, in respect of the steps referred to at paragraphs 7.3, 8.3 and 9.3, effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.
13. The Court will provide sealed copies of this Order to the Claimants' solicitors for service (whose details are set out below).

FURTHER DIRECTIONS

14. The Claimants have permission to amend the Claim Form and Particulars of Claim so as to update the plan attached to the Particulars of Claim (and corresponding description of the Defendants) to the same form as the plan appended to this Order in Schedule 2 as Plan A.
15. The Claimants, any person who falls within or may fall within the description of the Defendants or any other person who is or may be affected by the Claim or this Order has liberty to apply to the Court to discharge or vary the Order and/or for further case-management directions.
16. No acknowledgment of service, admission or defence is required by any party until further so ordered.

COSTS

17. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANTS

18. The Claimants' solicitors and their contact details are:

- (1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

- (2) Phil Spencer

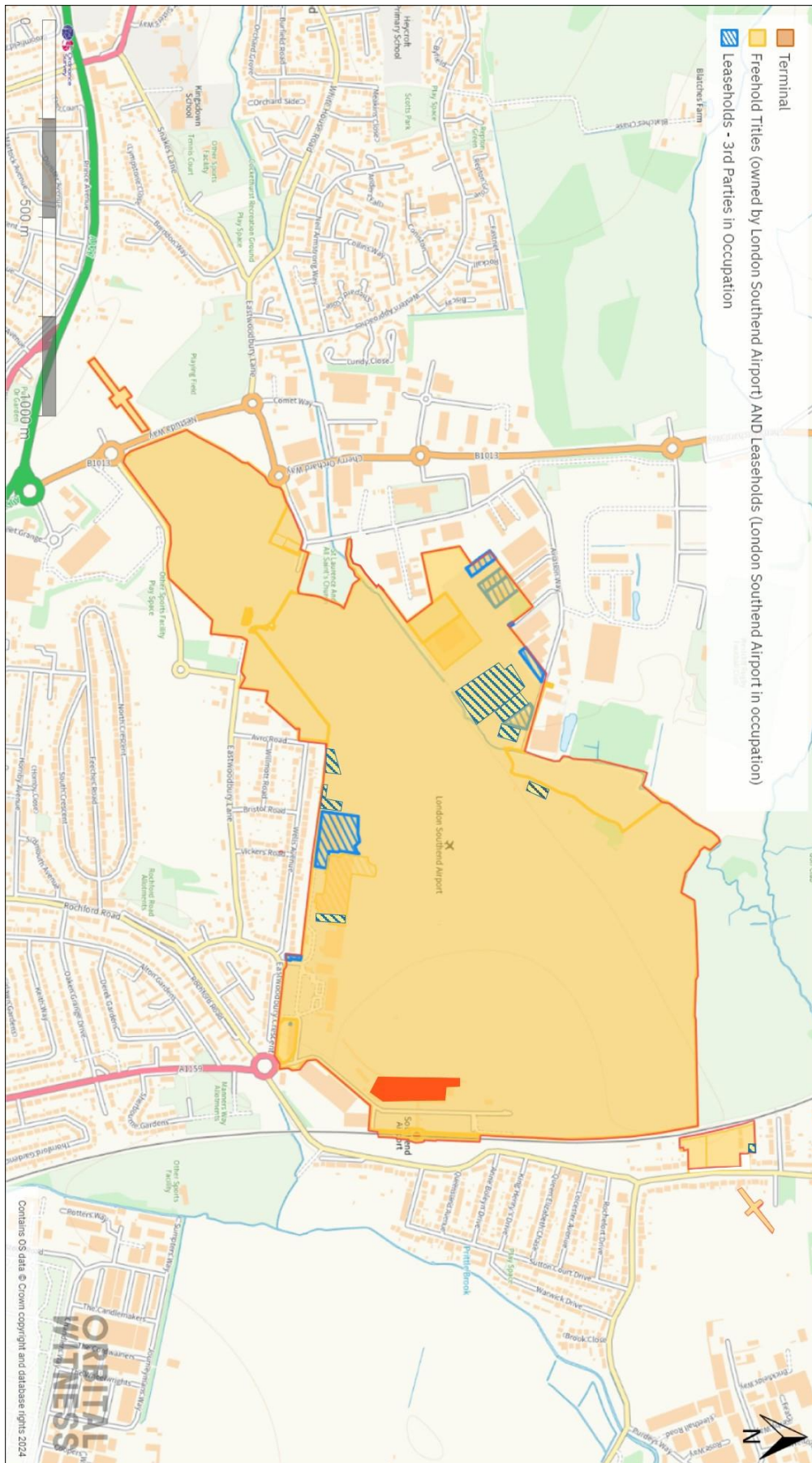
Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

Dated: 14 August 2024

SCHEDULE 1 – CLAIMANTS’ UNDERTAKINGS TO THE COURT

1. The Claimants will take the steps set out in paragraphs 7 and 8 of the Order to notify Defendants of the Amended Claim Form, Amended Particulars of Claim, Application Notice, evidence in support, the Order and a Note of the Hearing on 14 August 2024 as soon as practicable and no later than 5pm on 20 August 2024.
2. The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

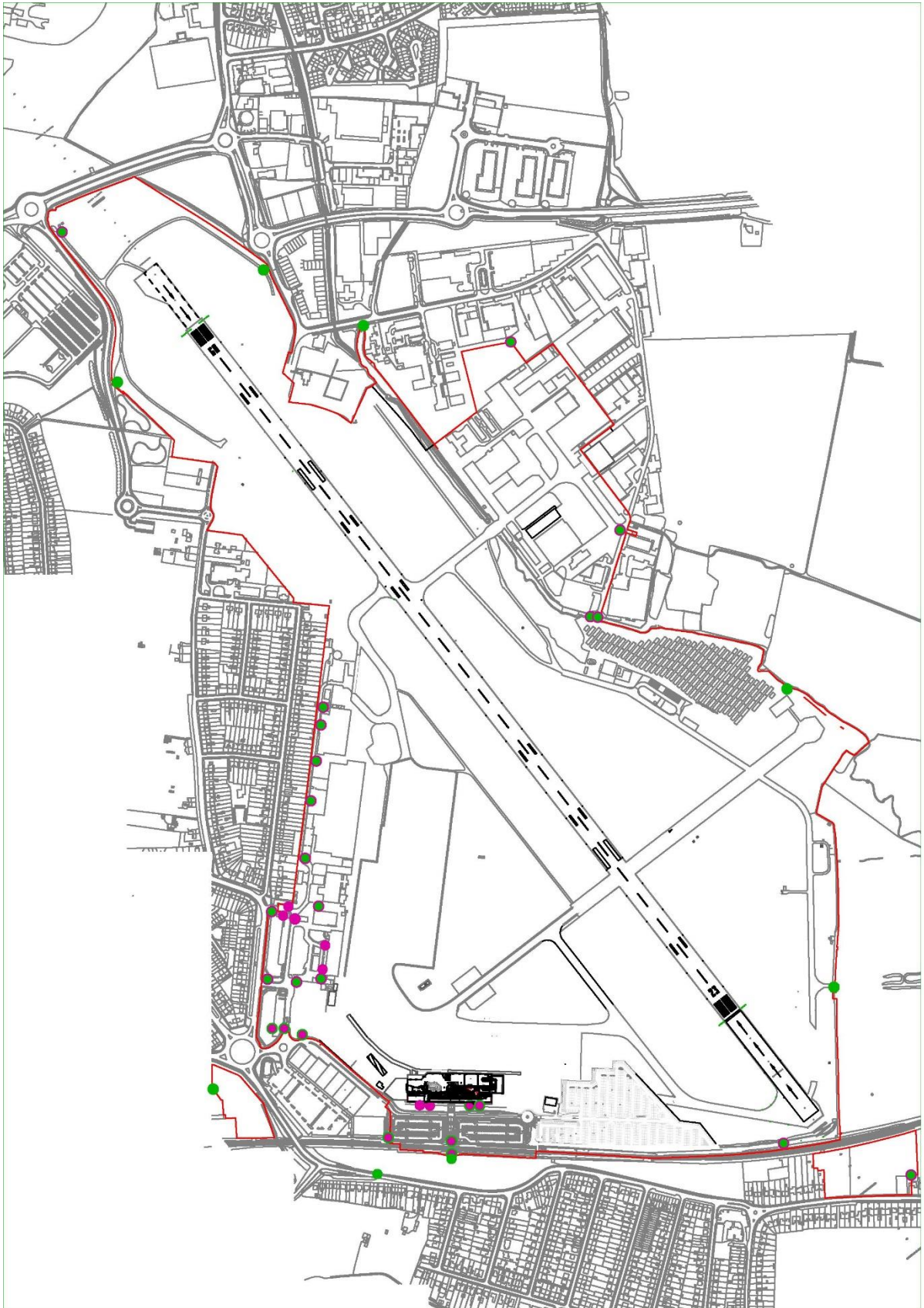
SCHEDULE 2 – PLAN A



SCHEDULE 3 – EMAIL ADDRESSES

1. juststopoil@protonmail.com
2. juststopoilpress@protonmail.com
3. info@juststopoil.org

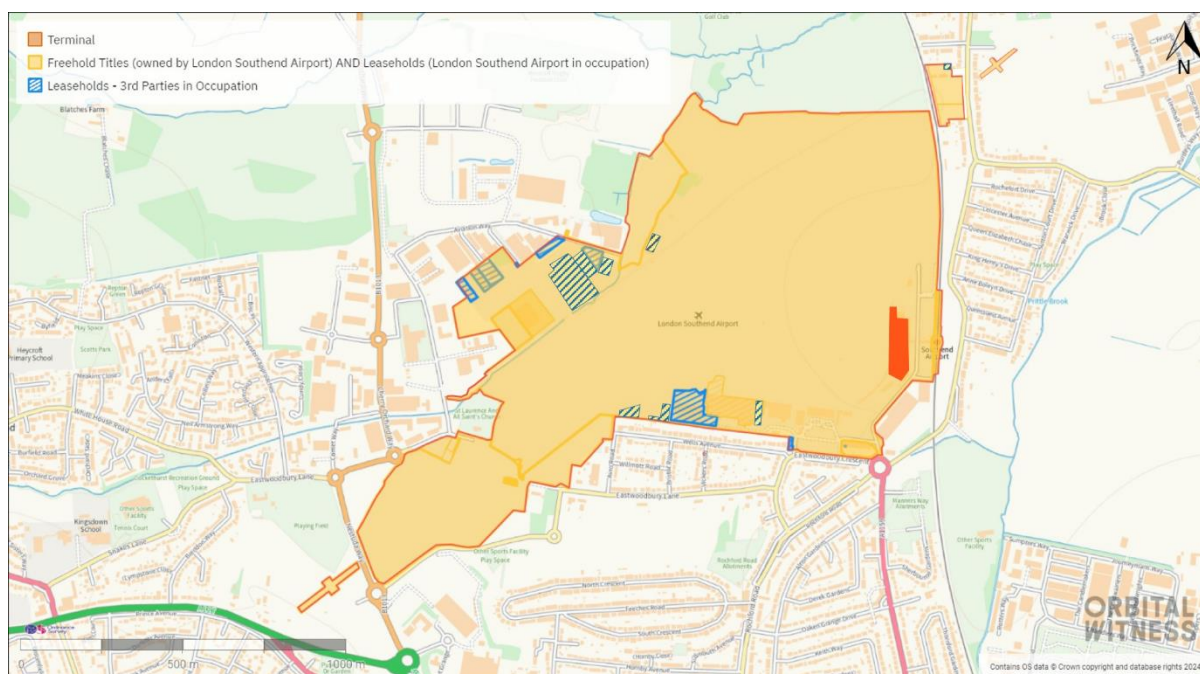
SCHEDULE 4 – PLAN B



SCHEDULE 5 – NOTICE
WARNING – NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted in Claim No. KB-2024-002596 granted on 14 August 2024 until 14 August 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, now exists in relation to London Southend Airport. The injunction means you may NOT without the express consent of (1) LONDON SOUTHEND AIRPORT COMPANY LIMITED, (2) LONDON SOUTHEND SOLAR LIMITED OR (3) THAMES GATEWAY AIRPORT LIMITED:

IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN ENTER, OCCUPY OR REMAIN UPON 'LONDON SOUTHEND AIRPORT' AS IS SHOWN EDGED RED ON THE PLAN BELOW:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED, OR HAVE THEIR ASSETS SEIZED.

A copy of the legal proceedings (including the Order, Amended Claim Form, Amended Particulars of Claim, Application Notice, evidence in support and a note of the hearing on 14 August 2024) can be viewed at <http://londonouthendairport.com/corporate/injunction> or obtained from:

- (1) Ticket Office, Southend Airport Train Station, Southend-on-Sea, Essex SS2 6YF, which is open between 9am-5pm Monday-Friday; or
- (2) Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR (Reference: AMRK/PSPE/3014634.1; Telephone: 020 3400 3119).

Anyone notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application. The address of the Court is the Royal Courts of Justice, Strand, London WC2A 2LL.

Ahmed El-Atrash

From: KB Judges Listing Office <KBJudgesListingOffice@Justice.gov.uk>
Sent: 14 April 2025 12:49
To: Phil Spencer
Subject: KB-2024-002596 London Southend Airport Company Limited And Others -v- Unknown

Dear all,

In accordance with the Order of The Honourable Mrs Justice Farbey dated 14th August 2024:

The **Annual Injunction Review Hearing** in this matter has been listed for **22nd October 2025** for **1 ½ hours** before a High Court Judge, in person.

The Judge and start time of the hearing will be confirmed on the working day before on the Daily Cause List.

Please forward on a copy of this listing notice to all interested parties.

Kind regards



Subash Vasudevan

Judges Listing Office Team Leader

8x8 Contact Centre Supervisor

Room WG04 | King's Bench Division | HMCTS | Royal Courts of Justice | Strand | London | WC2A 2LL
DX: 44450 Strand | T: 020 3936 8957 | W: www.gov.uk/hmcts



[Here is how HMCTS uses personal data about you](#) ◀



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N244

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>

Name of court High Court of Justice (KBD)		Claim no. KB-2024-002596	
Fee account no. (if applicable) PBA0076972		Help with Fees – Ref. no. (if applicable) HWF- - - - -	
Warrant no. (if applicable)			
Claimant's name (including ref.) (1) London Southend Airport Company Limited, (2) London Southend Solar Limited, (3) Thames Gateway Airport Limited			
Defendant's name (including ref.) Persons Unknown as defined in the Amended Particulars of Claim			
Date		13 August 2025 13 Aug 2025	

1. What is your name or, if you are a legal representative, the name of your firm?
Bryan Cave Leighton Paisner LLP
KB-2024-002596

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative Sub Event ID: 10
☐ Other (please specify)

If you are a legal representative whom do you represent? Claimants

3. What order are you asking the court to make and why?
An order to continue the injunction granted by the Order of Farbey J dated 14 August 2024. Please see further information in box 10 below.

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? 1 Hours 30 Minutes
Is this time estimate agreed by all parties? ☐ Yes ☒ No

7. Give details of any fixed trial date or period 22 October 2025

8. What level of Judge does your hearing need? High Court Judge

9. Who should be served with this application? N/A (see box 9a below)

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.
The Claimants will serve pursuant to the requirements set out at paragraph 9 of the Order of Farbey J dated 14 August 2024.

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.

Paragraph 3 of the Order of Farbey J dated 14 August 2024 (the "Order") requires that an annual review hearing be arranged. On 11 March 2025, the Claimants wrote to the Court to request such hearing be listed in accordance with the Order. A hearing was duly listed for 22 October 2025, in person before a High Court Judge, for a time of 1.5 hours.

Paragraph 3 of the Order also refers, at the end, to the Claimants having "applied" for the review hearing. In the event that this should be interpreted as the Claimants having made a formal application on form N244, the Claimants are therefore doing this (despite the hearing already being listed) for the sake of good order.

The Claimants respectfully request a sealed copy of the this application notice, and that the existing hearing be preserved.

Directions on further evidence and filing deadlines have already been set in paragraph 3 of the Order, and the Claimants intend to follow those in due course.

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
1 3	0 8	2 0 2 5

Full name

Philip Keith Spencer

Name of applicant’s legal representative’s firm

Bryan Cave Leighton Paisner LLP

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

Senior Associate

Applicant's address to which documents should be sent.

Building and street

Governor's House, 5 Laurence Pountney Hill

Second line of address

Town or city

London

County (optional)

Postcode

E	C	4	R	0	B	R
---	---	---	---	---	---	---

If applicable

Phone number

Fax phone number

DX number

Your Ref.

AMRK/PSPE/3014634.1

Email

phil.spencer@bclplaw.com

Made on behalf of the Claimants
Witness: Marc Taylor
Number of Statement: Second
Exhibit: N/A
Dated: 6 October 2025

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BETWEEN:

**(1) LONDON SOUTHEND AIRPORT COMPANY LIMITED
(2) LONDON SOUTHEND SOLAR LIMITED
(3) THAMES GATEWAY AIRPORT LIMITED**

Claimants

- and -

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN
(WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHEND
AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO
THE AMENDED PARTICULARS OF CLAIM**

Defendants

SECOND WITNESS STATEMENT OF MARC TAYLOR

I, **MARC TAYLOR**, of London Southend Airport Company Limited, London Southend Airport, Southend-On-Sea, Essex, United Kingdom, SS2 6YF **will say as follows:**

1 I am the Managing Director for Operations of the First Claimant, London Southend Airport Company Limited. I have worked at London Southend Airport ("London Southend" or the "Airport") for over 26 years. During my

tenure, I have also held the roles of Head of Asset Management, Operations Director and acting Deputy CEO. This is my second witness statement in these proceedings.

- 2 The other Claimants are subsidiary companies of the First Claimant, and I am also Managing Director for Operations of those entities. The roles of the Second and the Third Claimants in connection with the Airport are set out in my first statement, and I do not repeat them.
- 3 The formulation and execution of the security strategy for London Southend is my responsibility. I am also the Accountable Manager to the Civil Aviation Authority for issues involving security and safety.
- 4 Except where I state to the contrary (in which case I give the source of information upon which I rely) I can state the matters in this witness statement from my own knowledge.
- 5 Where facts and matters referred to in this statement are not within my own knowledge, they are based on instructions, documents and information supplied to me in my capacity as Managing Director for Operations of the First Claimant or Deputy CEO of the other Claimants, and are true to the best of my knowledge and belief.
- 6 I make this statement in relation to the first annual review hearing of the injunction granted by the Order of Farbey J, dated 14 August 2024 (the “Injunction”). That hearing has been listed on 22 October 2025. The Claimants are seeking renewal of the Injunction.
- 7 I am duly authorised to make this statement on behalf of the Claimants.

LONDON SOUTHEND AIRPORT – BUSINESS UPDATE

- 8 I do not propose to set out in full the information contained in my first witness statement, but instead provide updates which I hope will assist the Court.

9 Since my first witness statement, operations at the Airport have continued to grow. I believe this makes the Airport even more of a potential target for disruptive activists. In particular:

- (a) This year, passenger numbers will have risen to approximately 700,000 (from 300,000 in 2024). Whilst scheduled services remain largely leisure focused (and so the risk of any disruption will be particularly felt by families and holidaymakers), these figures do also reflect an increase in business and aviation charter services to VIP clients and business individuals.
- (b) Since April 2025, the Airport has served approximately 73,000 – 89,000 passengers per month (up from 33,000 – 37,000 over the same period in 2024);
- (c) Core operational hours are now 03:30 to 23:30 daily; and
- (d) Daily average revenue in August 2025 was estimated at £115,000 (up from £67,000 in 2024).

LONDON SOUTHEND AIRPORT – REGULATIONS, CONSENT TO ENTER AND BYELAWS

10 I confirm the position remains the same as set out in my first witness statement and so I do not repeat that information here.

LONDON SOUTHEND AIRPORT – THE ON-GOING THREAT

11 In preparing this witness statement, I have had sight of the first witness statement of Philip Keith Spencer of Bryan Cave Leighton Paisner LLP (“BCLP”), solicitors for the Claimants. I refer the Court to that for a detailed history of incidents involving environmental campaigners who are likely to pose a threat to the Airport since the Injunction was granted.

12 From the Claimants’ perspective, it is clear that environmental campaigners did carry out the threatened action during and after the summer of 2024, and environmental campaign groups committed to “direct action” remain a very

real threat, despite contradictory statements they may have put out. They remain defiant and continue to speak of intentions to disrupt airports and the wider ‘fossil-fuelled’ transport infrastructure.

13 The figures I cite above show that the Airport is growing and there are public expansion plans to develop the Airport further to allow the handling of more flights and passengers. In the last year, the Airport has been in the media many times with figures quoting passenger increases of over 100% on 2024 figures.

14 The Airport has also enjoyed an increased presence in the media for other reasons. For example:

(a) The Private Jet Centre handles numerous high-profile people, including celebrities, which undoubtedly make it desirable for environmental campaigners to seek to disrupt. In the past few months, for example, the Private Jet Centre hosted the ‘Lioness’ England Women’s football team, so is now well publicized. It is also well documented from their public comments that private aviation remains a high priority for activist groups. Private aviation was actively targeted at Oxford Airport by Extinction Rebellion on 5th July 2025.

(b) London Southend Airport regularly hosts the RAF Red Arrows, Battle of Britain Memorial Flight and several active RAF Typhoon jet fighter aircraft. These aircraft often spend days at the airfield to deploy to airshows across the South East. Their activities are covered by the press and aviation publications. Given the significant damage caused to RAF aircraft at RAF Brize Norton on 20th June 2025, this demonstrates an escalation in the tactics used by activists in general and their preparedness to damage RAF aircraft in pursuit of their cause. In addition, the Airport is also a base to the joint OSRL (Oil Spill Response Limited) marked Boeing 727 Aircraft. Given it is operated and paid for by the UK Oil industry, this is also an obvious target for ‘fossil fuel’ activists.

15 I also note from an operational perspective that any risk to London Southend Airport is exacerbated by the fact that all other London airports (and nearly

all of the major UK airports) have dedicated high-profile armed policing teams based on site. London Southend Airport does not have any Police based on site and relies purely on a response from the local Policing teams. This may delay any response to protest and by virtue cause increased disruption.

- 16 I am also informed by BCLP that 12 other airports have now had their similar injunctions renewed. I am concerned that if London Southend Airport cannot secure the continuation of the Injunction, it will be an obviously more attractive target for disruption.

CONCLUSION

- 17 In light of all the factors set out above, including the continued expansion and increased profile of the Airport, I ask the Court to renew the Injunction.

Statement of Truth

I believe that the facts stated in this Witness Statement and Exhibit are true. I understand that proceedings for contempt of court may be brought against anyone 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.

Signed by:

474A62B94521461...
Marc Taylor

6 **October 2025**

Made on behalf of the Claimants
Witness: Philip Keith Spencer
Number of Statement: First
Exhibit: PS1
Dated: 6 October 2025

IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION

Claim No: KB-2024-002596

BETWEEN:

- (1) LONDON SOUTHEND AIRPORT COMPANY LIMITED**
- (2) LONDON SOUTHEND SOLAR LIMITED**
- (3) THAMES GATEWAY AIRPORT LIMITED**

Claimants

- and -

PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS’ CONSENT) UPON ‘LONDON SOUTHEND AIRPORT’ AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE AMENDED PARTICULARS OF CLAIM

Defendants

FIRST WITNESS STATEMENT OF PHILIP KEITH SPENCER

I, **PHILIP KEITH SPENCER**, of Governor’s House, 5 Laurence Pountney Hill, London EC4R 0BR, **will say as follows:**

- 1. I am a senior associate in the firm of Bryan Cave Leighton Paisner LLP (“**BCLP**”). BCLP act for the Claimants (“**Southend**”) in this matter. I am duly authorised to make this witness statement on behalf of Southend. This is my first witness statement in these proceedings.

2. Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge.
3. Where facts and matters referred to in this statement are not within my own knowledge they are based on instructions, documents and information supplied to me in my capacity as solicitor for the Claimants and are true to the best of my knowledge and belief.
4. I refer to a paginated bundle of documents, attached as Exhibit “PS1”. Where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit “PS1”.
5. At various points in this statement I refer back to earlier witness statements that have been filed on behalf of Southend in these proceedings. To avoid unnecessary duplication, I do not exhibit those earlier statements (or their exhibits). The earlier statements (but not, in the interests of proportionality, their exhibits) will be included in the hearing bundle for the review hearing (which will also be made available electronically at: <https://londonsouthendairport.com/corporate/injunction/>). In the meantime, and pending production of that hearing bundle, those witness statements – as well as their exhibits – can also already be found at that same website. If any reader of this witness statement is struggling to access any relevant documents, they should contact BCLP for assistance. The relevant contact details are set out in the Injunction (as defined below) at paragraph 16.
6. This witness statement adopts the following structure:
 - 6.1. Firstly, I set out briefly the background to the Injunction which now falls to be reviewed. In this context, I also outline the approach recently taken by the Court to the renewal of similar injunctions in favour of 12 other airports.
 - 6.2. Secondly, I outline the reasons why Southend considers that there has been no material change to (and certainly no material diminishment of) the risk of unlawful direct action activities being targeted by “Just Stop Oil”

(“**JSO**”) or other environmental campaign at Southend. In this context, I update the Court on the status of JSO.

6.3. Finally, I address various procedural matters.

I. BACKGROUND

The Original Injunction & The Review Hearing

7. By a without notice injunction granted by Mrs Justice Farbey on 14 August 2024 (“the **Injunction**”), the Court prohibited a class of “Persons Unknown” (as defined as the Defendants to the Claim) from entering or remaining on Southend Airport (“the **Airport**”) in connection with the JSO campaign (or other environmental campaign) without Southend’s consent (exhibited at **PS1/1; Page 1 to Page 11**). That application was sought by Southend in connection with a high-profile campaign of ‘direct action’ disruption threatened (and in some instances, carried out) by JSO. The background to the Injunction is summarised within the First Witness Statement of Akhil Markanday in these proceedings dated 9 August 2024 (“**Markanday 1**”).
8. The reasons for the grant of the Injunction are recorded in the *ex tempore* judgment of Mrs Justice Farbey dated 14 August 2024 as recorded in the note of the judgment prepared by my firm and published on Southend’s website (exhibited at **PS1/2; Page 12 to Page 29**).
9. The steps undertaken by Southend to effect service of the Injunction were carried out over the following days and completed by 15:58 on 20 August 2024 (as subsequently confirmed in a Certificate of Service filed with the Court by BCLP dated 29 July 2025 (**PS1/3; Page 30 to Page 31**), pursuant to paragraph 11.2 of the Injunction).
10. Pursuant to paragraph 3 of the Injunction, the Injunction is to be reviewed on each anniversary (or as close to this date as is convenient having regard to the Court’s list) with a time estimate of 1 ½ hours. That review hearing has now been listed for 22 October 2025. I make this witness statement for the purposes of the review hearing. Southend seeks the continuation of the Injunction at this hearing.

The Review Hearings for 12 other Airports

11. 12 other airports in the UK obtained similar injunctions to the Injunction in the summer of 2024, each of which also contained mechanisms for annual review. On 24 June 2025, Mr Justice Bourne conducted a review hearing for the following 10 airports heard on a joint basis: London City Airport, Manchester Airport, Stansted Airport, East Midlands Airport, Leeds Bradford Airport, Luton Airport, Newcastle Airport, Birmingham Airport, Bristol Airport and Liverpool Airport (the other 2 airports with injunctions being London Heathrow Airport and London Gatwick Airport, both of which had hearings after this date as described below).
12. Mr Justice Bourne ordered that each of the injunctions be continued without change (apart from a minor alteration to the geographical extent of the injunction in respect of London City Airport, as requested by London City Airport due to a change in the layout of that site). The papers in relation to the review hearing on 24 June 2025 can be obtained on the London City Airport website (<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>), along with a copy of the Order of Mr Justice Bourne made at that hearing. For ease of reference, I exhibit a copy of Mr Justice Bourne's 24 June 2025 Order at **PS1/4 (Page 32 to Page 49)**.
13. Mr Justice Bourne's reasons for continuing the injunctions were set out in an *ex tempore* judgment. I exhibit at **PS1/5 (Page 50 to Page 59)** a brief report of the decision (with citation [2025] 6 WLUK 499).
14. The Claimants are also aware that London Gatwick Airport was granted a renewal of its injunction following a review hearing on 18 July 2025. Mr Duncan Atkinson KC (sitting as a Deputy High Court Judge) set out the reasons for continuing the injunction in an *ex tempore* judgement. I exhibit at **PS1/6 (Page 60 to Page 72)** a brief report of the decision (with citation [2025] 7 WLUK 398) and at **PS1/7 (Page 73 to Page 86)** and a copy of that 18 July 2025 Order.
15. London Heathrow Airport was also granted a renewal of its injunction following a review hearing on 23 July 2025. BCLP also acted on behalf of London Heathrow Airport. I exhibit at **PS1/8 (Page 87 to Page 101)** a copy of Mr Justice Turner's 23 July 2025 Order.

16. Southend is now therefore the only major airport yet to have its injunction renewed. If renewal were not the granted, this would single out Southend as a potential target for any future action by the Defendants.

Another Relevant Recent Hearing

17. Southend is also aware that following a review hearing on 18 September 2025, the High Court in Birmingham ordered that the Kingsbury Oil Terminal Injunction, to which JSO is a class of defendant, be continued subject to a further review in 12 months. The judgment of HHJ Emma Kelly on 23 September 2025 considered that the injunction helps to protect residents and businesses from the continuing threat of unlawful protest activity **PS1/9 (Page 102 to Page 115)**.

II. PROCEEDING AGAINST PERSONS UNKNOWN

18. At the time the Injunction was sought, Southend did not know the names of the individuals who threatened to commit acts of direct action at the Airport. That is why the claim was brought only against “Persons Unknown”, in a form now widely described as a ‘newcomer injunction’.
19. I can confirm that there has not been a change in the position outlined above. Southend remains unable to identify or join any named Defendant to the claim.

III. CONTINUING RISK OF DIRECT ACTION

20. Southend’s position, in common with the position of (i) the 10 airports whose injunctions were considered at the review hearing before Mr Justice Bourne on 24 June 2025; (ii) London Gatwick whose injunction was considered before Judge Duncan Atkinson KC on 18 July 2025 and (iii) London Heathrow whose injunction was considered before Mr Justice Turner on 23 July 2025, is that the risk of unlawful direct action activities being directed at Southend by JSO or other environmental campaigners has not abated since the Injunction was granted.
21. I have already referred to Markanday 1 and the *ex tempore* judgment of Mrs Justice Farbey giving reasons for the original Injunction, which set out the risks of such activities as they then stood.

21.1. Whilst it might be argued that the subsequent lack of direct action against some other UK airports since the grant of the Injunction represents a diminution of the risk of such activities, this may also be due (and Southend believes it to be in substantial part due) to the success of the Injunction (and other like injunctions in favour of the other main UK airports) in deterring such activities.

21.2. The reasons for that belief, i.e. the belief that the underlying risk of unlawful direct action retains materially unchanged, is set out below.

Other UK activist activity

22. Southend is aware of the following events involving other UK airports that have occurred from June 2024 to date. I also note that there have been other activities carried out by the groups below not specifically involving airports within the UK, but in an effort to keep the evidence presented to the Court proportionate, these are not covered in detail by this statement:

3 June 2024: Extinction Rebellion conducted a protest at Farnborough Air Show which involved blocking the 3 main gates and parking the Extinction Rebellion pink boat across the Gulfstream gate.

20 June 2024: Two JSO activists were arrested at Stansted Airport for attempting to target Taylor Swift's private jet with orange paint and were later found guilty at Chelmsford Crown Court with sentencing scheduled for 27 October 2025.

27 June 2024: Four JSO activists were arrested at Gatwick Airport.

27 July 2024: An activist was escorted away from the Heathrow Airport's Terminal 5 departures area by the police for conducting a demonstration involving the display of an "Oil Kills" sign.

27 July 2024: a JSO action which was planned for London City Airport was relocated to the Department of Transport on Horseferry Lane.

29 July 2024: Seven individuals affiliated with JSO were arrested at the perimeter fence of Heathrow Airport with equipment to breach the perimeter fence.

29 July 2024: Eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure.

30 July 2024: Two individuals wearing JSO-branded clothing were arrested by the police for spraying orange paint around the Heathrow Airport Terminal 5 departures area using JSO-branded fire extinguishers.

31 July 2024: JSO and Free Fossil London (“**FFL**”) took action at the Docklands Light Railway station at City Airport.¹

1 August 2024: JSO activists blocked access to the security area of the Heathrow Airport Terminal 5 departures area and were removed by the police.

6 August 2024: Five JSO activists were arrested on their way to Manchester Airport equipped with bolt cutters, angle grinders, glue, sand and banners carrying slogans including “oil kills”.

2 February 2025: Extinction Rebellion held a demonstration at Farnborough Airport following a consultation period in relation to Farnborough Airport’s expansion plans which ended in October 2024.

17 February 2025: Extinction Rebellion held a demonstration at Inverness Airport waving banners with “Ban Private Jets” and “We’re in a climate emergency, we need to step up and take action”.

27 June 2025: Four people in connection with a pro-Palestine group broke into an RAF base at Brize Norton and vandalised military aircraft.

23. Copies of media articles detailing the events referred to above are exhibited at **PS1/10 (Page 116 to Page 162)**.

Current status of JSO

¹ I have obtained the information in respect of this incident from the Witness Statement of Stuart Sherbrooke Wortley dated 6 June 2025 which was provided to the Court in support of the London City Airport and others’ review hearing on 24 June 2024 and is available on the following website: <https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>

24. On 27 March 2025, JSO made the following announcement on its website, headed ‘We are hanging up the Hi Vis’:

“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”

25. A copy of this announcement is exhibited at **PS1/11 (Page 163 to Page 164)**.
26. On 18 May 2025, GB News reported (both on television and on their website) that JSO were planning to make a comeback.
27. Ben Leo of GB News reported on television the following:

“...I can exclusively reveal that Just Stop Oil is plotting a very big comeback.

On Ben Leo Tonight, we have gained access to secret Just Stop Oil meetings, where members are discussing a dramatic U-turn— planning to cause absolute chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and even carrying out “citizens’ arrests” on so-called climate criminals.

Speaking during an online meeting on Thursday night, one coordinator—known only as “Dave”—said protests should remain “action-based” and warned against becoming more peaceful, like Greenpeace.

The meeting continued with Dave insisting that it was essential to keep doing what he called the “spicy and naughty stuff” to generate media attention.

The group also discussed how to feed new protest ideas back to what they referred to as a “core team”. There was frustration over communication with this mysterious leadership group, with some suggesting using 50-word briefs to make it easier for them to process ideas.

It raises serious questions: Who exactly is this core team? Who are these professional protesters reporting to—and who’s funding them?

Chillingly, the group also spoke about carrying out citizen’s arrests on so-called climate deniers. There was some introspection as well, with members questioning whether their public image was doing more harm than good.

But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to proceed with Just Stop Oil’s revival, including talk of keeping protesters in safe houses to maintain morale....”

28. A copy of the news article is exhibited at **PS1/12 (Page 165 to Page 170)** and a link to the television report can be accessed on the following website:
<https://www.gbnews.com/opinion/ben-leo-opinion-just-stop-oil>.
29. Southend is aware from the review hearing for the 10 other Airports on 24 June 2025 that JSO had emailed London City Airport’s solicitor in response to the article confirming that “GB News was right for once” and that JSO are “plotting a very big comeback”. A copy of this email from JSO to Stuart Wortley of Eversheds was provided to the Court as part of London City Airport and others’ evidence ahead of the review hearing on 24 June 2025 and was referred to by Bourne J when granting his order. We have obtained a copy of this correspondence from the London City Airport website and have exhibited a copy at **PS1/13 (Page 171 to Page 172)** for ease of reference.

Other environmental / climate campaign groups

30. Regardless of what JSO have said, and the precise risk presented by that group in particular, there are also several other environmental campaign groups whose behaviour poses a risk to airports, including Southend. Of primary concern to Southend are the following:

Youth Demand

31. In January 2024 a group called ‘Youth Demand’ was formed. The press has described Youth Demand as “JSO 2.0” (news article exhibited at **PS1/14; Page 173 to Page 177**).

32. Youth Demand’s website states:

“In 2024, we built a national youth resistance organisation. We mobilised over a thousand people to pull off 60 actions, from blockading central London during the summer, plastering a picture from the Gaza genocide on a Picasso painting and shutting down five UK cities in November”.

33. The group remains active and its website lists that it is arranging “nonviolence training” on 6 July 2025 and “Volunteer Training” on 12 July 2025.

FFL

34. FFL is a climate activist group that was formed around 2019.

35. FFL’s website states:

“Fossil Free London is a climate justice organisation dedicated to disrupting the fossil fuel industry here in our city.

Through direct action, strategic campaigning, and movement building, we challenge the social licence of elites and corporate polluters. We advocate for a rapid and just transition towards a sustainable and equitable society.”

36. On 30 April 2025, activists associated with FFL disrupted Heathrow Airport’s panel appearance at the Innovation Zero conference at Olympia London. As mentioned above, FFL was also involved in direct action at the Docklands Light Railway station at London City Airport on 31 July 2025.

Extinction Rebellion

37. Extinction Rebellion remains a very active climate activist group, which has publicised an intention to take further action this summer, including the targeting of airports.

38. As noted above, Extinction Rebellion has already taken action at UK airports including Farnborough Airport and Inverness Airport.
39. Its website includes an article dated 19 June 2025 headed “Summer of Action” (copied below), which includes planned activity Oxford Airport:

“A Summer of Action

*While politicians supported airport expansions, degraded our environmental laws and parliament tightened its chokehold on climate activists, global average temperatures in 2024 blew past 1.5°C. Now the UK has recorded its warmest spring on record and its driest in over **50 years**.*

Rebels are refusing to be silenced. XR local and community groups all over the nations and regions of the UK are getting ready for a summer filled with defiant action. Creative, colourful, bold actions are being planned everywhere – join them, raise your voice in protest this summer.

Join in joy or join in despair, but let it be in unity, community, and curiosity. The sun will be a totem that we rally together around, never forgetting that it is a death sentence for millions on the frontlines of climate and ecological collapse.

There has never been a more vital time to act. It will be a rebellious summer.”

Insure Our Survival – Without insurance, fossil fuel companies can’t extract more oil, coal and gas. A Week of Action from **5th-12th July** – targeting insurers takes place with local groups across the UK planning actions.

Stop Private Jets – Join XR Oxford on **Saturday July 5th** in a march to Oxford Airport and say No to Private Jets. Find out more.

Heat Strike – A week of action **14th-20th July** to highlight rising temperatures’ impact on workers, as we pressure government and employers to take action. Learn more and get involved.

Funeral for Nature – Dress in black for a solemn march through **Bournemouth** on **Sunday July 27th**. This visual action mourning the destruction of nature will be silent apart from a drumbeat.

Don’t Pay for Dirty Water – Last year, sewage was discharged into UK waterways over 1,000 times a day. We are withholding payment of the sewerage charge portion of our bills until the UK government and water companies stop poisoning and start cleaning up coasts and waterways across the UK. Join the boycott **now!**

World Water Wedding – Water is sacred in many cultures. Water is fundamental to life. Wherever clean water flows, life grows. Water represents emotions, renewal and life, which all ebb and flow. Constantly evolving, ebbing and flowing, it reminds us that we can too. Commit to water for life on **August 24th**.

*For advice on the latest safety, legal and action support information, please join one of our online Prepare for Action workshops, upcoming on **26th June and 1st July**.*

40. A copy of this article is exhibited at **PS1/15 (Page 178 to Page 179)**.

Shut the System

41. Shut the System is a new group that does not appear to have a website.
42. It does have an Instagram account, and it posted on 16 April 2025 the following:

“A new type of movement is needed.

Our plan and pledge: Shut down the fossil fuel economy.

We pledge to target property and machinery of the destructive industries owned by the wealthiest and most responsible for the greatest crises humanity has ever faced. Our strategy is to disable the physical infrastructure of significant carbon emitters; whether emissions occur directly, or through their support for upstream business operation.”

43. In January 2025, Shut the System group cut fibre optic cables to Lloyds of London and prominent buildings involved in the insurance sector on Fenchurch Street, Threadneedle Street, Leadenhall Street and Lime Street in London (and in Birmingham, Leeds and Sheffield). I exhibit a press report about this action at **PS1/16 (Page 180 to Page 181)**.

VI. PROCEDURAL AND OTHER MATTERS

Notice of the Review Hearing

44. On 11 March 2025 BCLP wrote to the Court to request that an injunction review hearing be listed pursuant to paragraph 3 of the Injunction.
45. On 14 April 2025, the KB Judges Listing Office emailed BCLP informing BCLP that the review hearing had been listed for 22 October 2025 for 1.5 hours, before a High Court Judge, in person (the “**Notice of Review Hearing**”) – a copy of the Court’s email is at **PS1/17 (Page 182)**.
46. Pursuant to paragraph 9 of the Injunction, Southend undertook the following steps to give notice and effect service of the Notice of Review Hearing:
- 46.1. On 5 August 2025 at around 15:54, Southend updated its website to provide details of the review hearing;

46.2. On 5 August 2025 at 20:32, BCLP emailed the JSO email addresses ('juststopoil@protonmail.com'; 'juststopoilpress@protonmail.com'; 'info@juststopoil.org') providing the details of the review hearing (**PS1/18; Page 183 to Page 184**); and

46.3. On 23 August 2025 by 20:50 at the latest, the Claimants affixed printed copies of the Notice of Review Hearing to the locations marked with a green or purple dot in Plan B of the Injunction, as confirmed to me by London Southend Airport Head of Security Paul Moor.

47. The wording of paragraph 3 of the Injunction states that *“The injunction set out at paragraph 1 of this Order shall lapse at 4PM on the anniversary of this order...unless, before then, the Claimants have applied for the review to take place”*. In the event that this paragraph should be interpreted as requiring the Claimants to make a formal application on form N244, BCLP wrote to the Court on 13 August 2025 and CE-Filed an Application Notice with reference to the review hearing on 22 October 2025. The Application Notice was sealed on 13 August 2025 (**PS1/19; Page 185 to Page 189**). The steps taken to serve the sealed Application Notice in accordance with paragraph 9 of the Injunction were:

47.1. The Claimants uploaded a copy of the Application Notice to the website by 10:25 on 20 August 2025 as confirmed to me by the Paul Moror;

47.2. BCLP emailed JSO a copy of the Application Notice at 11:44 on 20 August 2025 (**PS1/20; Page 190 to Page 191**);

47.3. Printed copies of the Application Notice were affixed by the Claimants to the locations marked with a green or purple dot in Plan B of the Injunction. This was confirmed to me by Paul Moor to have been completed by at least 11:44 on 18 September 2025; and

47.4. BCLP filed a Certificate of Service to this effect on 18 September 2025 (**PS1/21; Page 192 to Page 193**).

Evidence for the Review Hearing

48. As of today's date, BCLP has not received any communications from anyone in relation to the Injunction, the Notice of Hearing, the Application Notice or regarding the review hearing.

Cross-Undertaking in Damages

49. I am authorised to confirm on behalf of Southend that it continues to offer the cross-undertaking in damages recorded in paragraph 2 of Schedule 1 to the Injunction.

Full and Frank Disclosure

50. I confirm that Southend is aware of its ongoing duty of full and frank disclosure, and I consider that I have complied with that duty in setting out above all relevant factual matters – including those which might be relied upon as tending against the continuation of the Injunction. The relevant points of law will be addressed in submissions on the Claimants' behalf of the renewal hearing.

VII. CONCLUSION

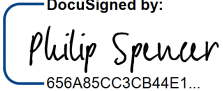
51. Southend obtained the Injunction following a high-profile campaign of threatened action against Airports by JSO.
52. Although JSO's announcement on 27 March 2025 stated that they are discontinuing any action, it is clear from press reports (which have been confirmed by JSO as correct) that JSO are 'plotting a very big comeback'. Southend can also not rule out that JSO's announcement was not simply a publicity stunt, or misdirection or that JSO did so tactically ahead of Southend's and the other airports' review hearings.
53. What is also clear, and set out above, is that there are other environmental groups taking similar action to the action previously carried out by JSO, including Youth Demand (which has been described as "JSO 2.0"), FFL, Extinction Rebellion and Shut the System.
54. FFL and Extinction Rebellion have previously taken action at UK Airports, and Extinction Rebellion publicised on 19 June 2025 that they are planning further

action at a UK Airport as part of their ‘Summer of Action’. It is also of concern that other groups have also sought to take action at airports, such as the incident at the RAF base on 27 June 2025 (albeit that this was in connection with events in the Middle East rather than environmental issues).

55. It also appears, from the recent activity and statements of Shut the System, that there may be a shift in the mindset of certain direct action activists from mere disruption to the physical sabotaging of operations. If so, the consequences of potential action at UK airports are likely to be more severe.
56. It is for these reasons that Southend’s position is to ask the Court to continue the Injunction in its current form (save for a clarificatory amendment to the wording of paragraph 3 of the Injunction to note a formal Application Notice not required for future review hearings) , subject to further review in 12 months’ time.

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

DocuSigned by:

656A85CC3CB44E1.....

Philip Keith Spencer

6 October 2025

IN THE HIGH COURT OF JUSTICE

Claim No.: KB-2024-002596

KINGS BENCH DIVISION

Before: The Honourable Mrs Justice Farbey

On: 14 August 2024

BETWEEN:



**(1) LONDON SOUTHEAST AIRPORT COMPANY LIMITED
(2) LONDON SOUTHEAST SOLAR LIMITED
(3) THAMES GATEWAY AIRPORT LIMITED**

Claimants

-and-

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN
(WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHEAST
AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE
AMENDED PARTICULARS OF CLAIM (AND ALSO ATTACHED TO THIS
ORDER)**

Defendants

ORDER

PENAL NOTICE

**IF YOU THE WITHIN DEFENDANTS OR 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 OR PERSONS UNKNOWN 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 AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it 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.

RECITALS

UPON the Claimants having issued this Claim by a Claim Form dated 12 August 2024 (amended 14 August 2024)

AND UPON hearing the Claimants' without notice application for an interim injunction by Application Notice dated 12 August 2024

AND UPON READING the Witness Statements of Akhil Markanday dated 9 August 2024 and Marc Taylor dated 9 August 2024

AND UPON HEARING Tom Roscoe, Counsel for the Claimants

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 1 to this Order

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest for them to designate an area for that purpose at London Southend Airport (as more particularly described in paragraph 1 below) should be made by email to media@londonouthendairport.com

IT IS ORDERED THAT:

INJUNCTION

1. Until 14 August 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the prior consent of the Claimants, enter, occupy or remain on London Southend Airport, Southend-On-Sea, Essex, as shown edged red on the plan annexed to this Order at Schedule 2 ("**Plan A**") in connection with Just Stop Oil or other environmental, climate or fossil-fuel campaign and/or protest.
2. In respect of paragraph 1, the Defendants must not: (a) do the prohibited acts himself/herself/themselves in any other way; or (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

3. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1 ½ hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of this Order (or as the case may be the anniversary of the latest annual review) unless, before then, the Claimants have applied for the review to take place.

VARIATION

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person, but they must first give the Claimants' solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 48 hours in advance of any hearing.
5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimants have liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

7. Pursuant to the guidance of the Supreme Court in *Wolverhampton CC v London Gypsies & Travellers* [2023] UKSC 47 ("**Wolverhampton**")¹, the Amended Claim Form, Amended Particulars of Claim, Application Notice, evidence in support and a Note of the Hearing on 14 August 2024 will be notified to the Defendants by the Claimants carrying out each of the following steps:

- 7.1 Uploading a copy on to the following website:
<http://londonsouthendairport.com/corporate/injunction>

¹ A copy of which, together with a "Press Summary", can be found at:
<https://www.supremecourt.uk/cases/uksc-2022-0046.html>

- 7.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made and that the documents can be found at the website referred to above.
- 7.3 Either affixing a notice at the locations shown marked with a green or purple dot on the second plan attached to this Order at Schedule 4 (“Plan B”) setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 8.4 below.
8. Pursuant to the guidance in *Wolverhampton*, this Order shall be notified to the Defendants by the Claimants carrying out each of the following steps:
- 8.1 Uploading a copy of the Order on to the following website:
<http://londonsouthendairport.com/corporate/injunction>
- 8.2 Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
- 8.3 Affixing a copy of the Order in A4 size in a clear plastic envelope at each of the locations shown with a green or purple dot on Plan B.
- 8.4 Affixing warning notices of A2 size at those locations marked with a green or purple dot on Plan B, substantially in the form of the notice at Schedule 5.
9. Pursuant to the guidance in *Wolverhampton*, notification to the Defendants of any further applications shall be effected by the Claimants carrying out each of the following steps:
- 9.1 Uploading a copy of the application on to the following website:
<http://londonsouthendairport.com/corporate/injunction>
- 9.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
- 9.3 Affixing a notice at these locations marked with a green or purple dot on Plan B stating that the application has been made and where it can be accessed in hard copy and online.

10. Pursuant to the guidance in *Wolverhampton*, notification of any further documents to the Defendants may be effected by carrying out the steps set out in paragraphs 9.1 and 9.2 only.
11. In respect of paragraphs 7 to 10 above:
 - 11.1 pursuant to CPR rr. 6.15, 6.27 and 81.4(2)(c) & (d), the taking of the steps set out at that paragraphs shall amount to good and proper service and effective notification of the Claim, the Order and any future application (respectively), and personal service of those documents is dispensed with; and
 - 11.2 service of documents under each of those paragraph will be deemed to have taken place on the date and at the time at which all the relevant steps have been carried out, and shall be verified by a Certificate of Service to be filed by the Claimants.
12. For the avoidance of doubt, in respect of the steps referred to at paragraphs 7.3, 8.3 and 9.3, effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.
13. The Court will provide sealed copies of this Order to the Claimants' solicitors for service (whose details are set out below).

FURTHER DIRECTIONS

14. The Claimants have permission to amend the Claim Form and Particulars of Claim so as to update the plan attached to the Particulars of Claim (and corresponding description of the Defendants) to the same form as the plan appended to this Order in Schedule 2 as Plan A.
15. The Claimants, any person who falls within or may fall within the description of the Defendants or any other person who is or may be affected by the Claim or this Order has liberty to apply to the Court to discharge or vary the Order and/or for further case-management directions.
16. No acknowledgment of service, admission or defence is required by any party until further so ordered.

COSTS

17. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANTS

18. The Claimants' solicitors and their contact details are:

- (1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

- (2) Phil Spencer

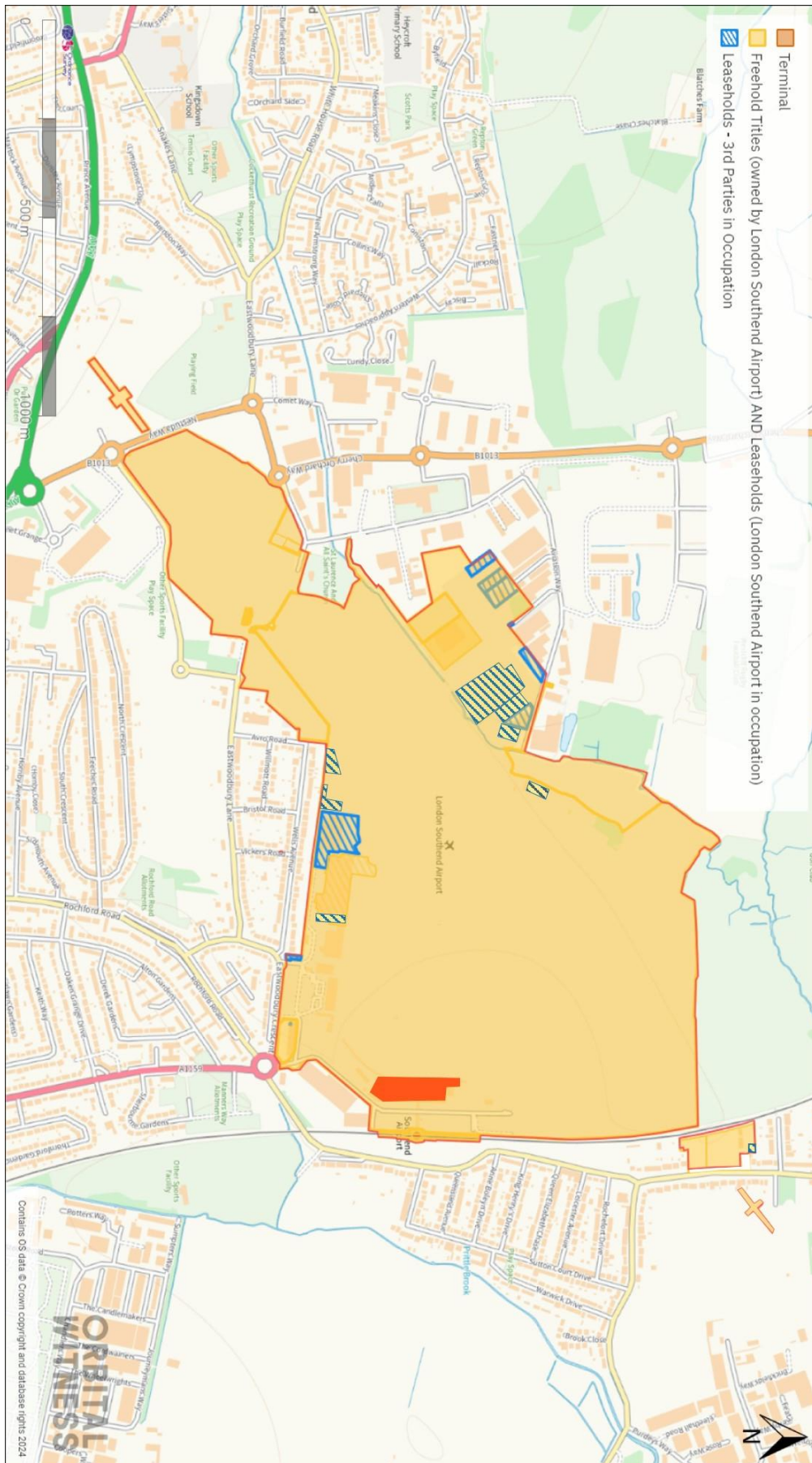
Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

Dated: 14 August 2024

SCHEDULE 1 – CLAIMANTS’ UNDERTAKINGS TO THE COURT

1. The Claimants will take the steps set out in paragraphs 7 and 8 of the Order to notify Defendants of the Amended Claim Form, Amended Particulars of Claim, Application Notice, evidence in support, the Order and a Note of the Hearing on 14 August 2024 as soon as practicable and no later than 5pm on 20 August 2024.
2. The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

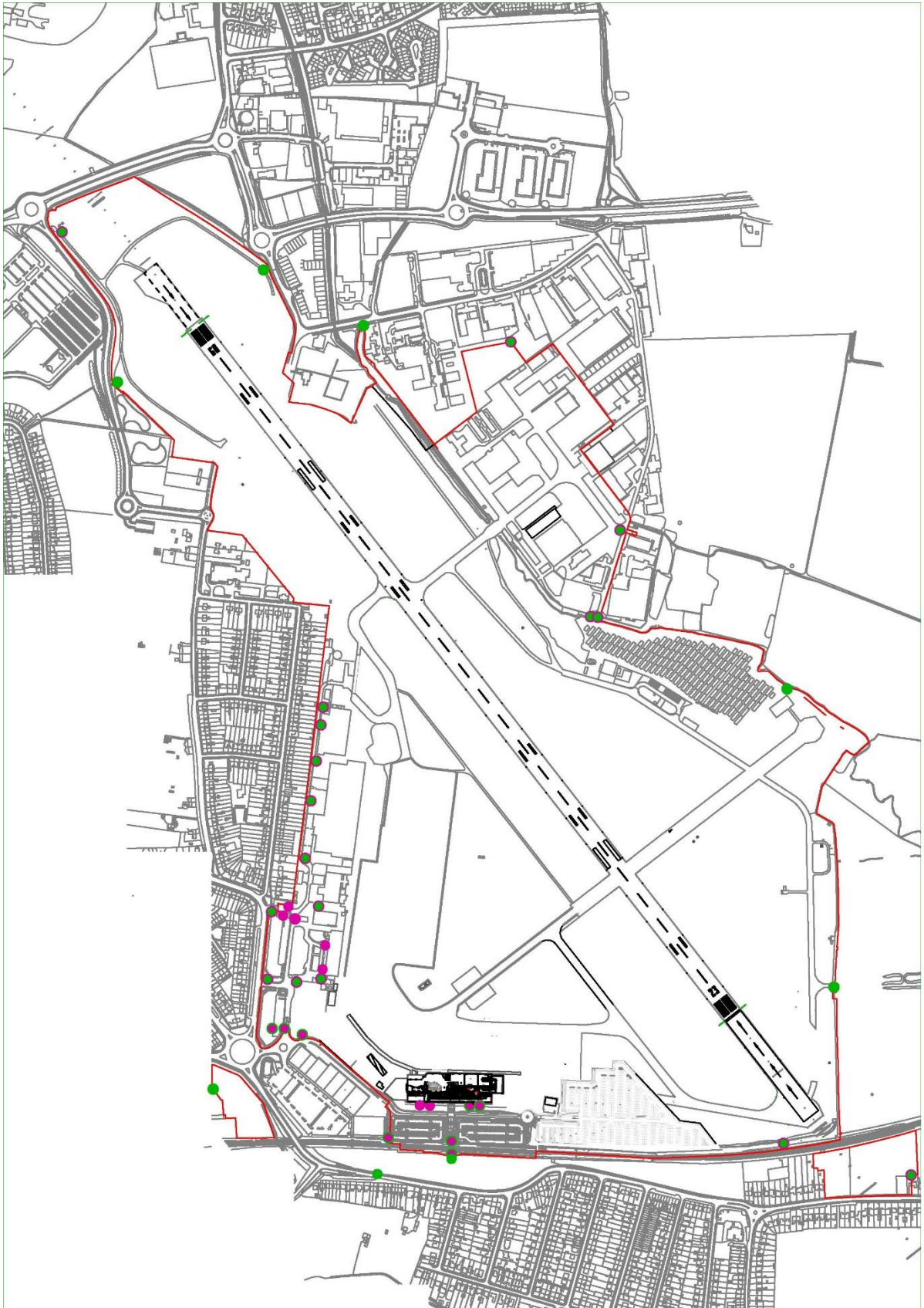
SCHEDULE 2 – PLAN A



SCHEDULE 3 – EMAIL ADDRESSES

1. juststopoil@protonmail.com
2. juststopoilpress@protonmail.com
3. info@juststopoil.org

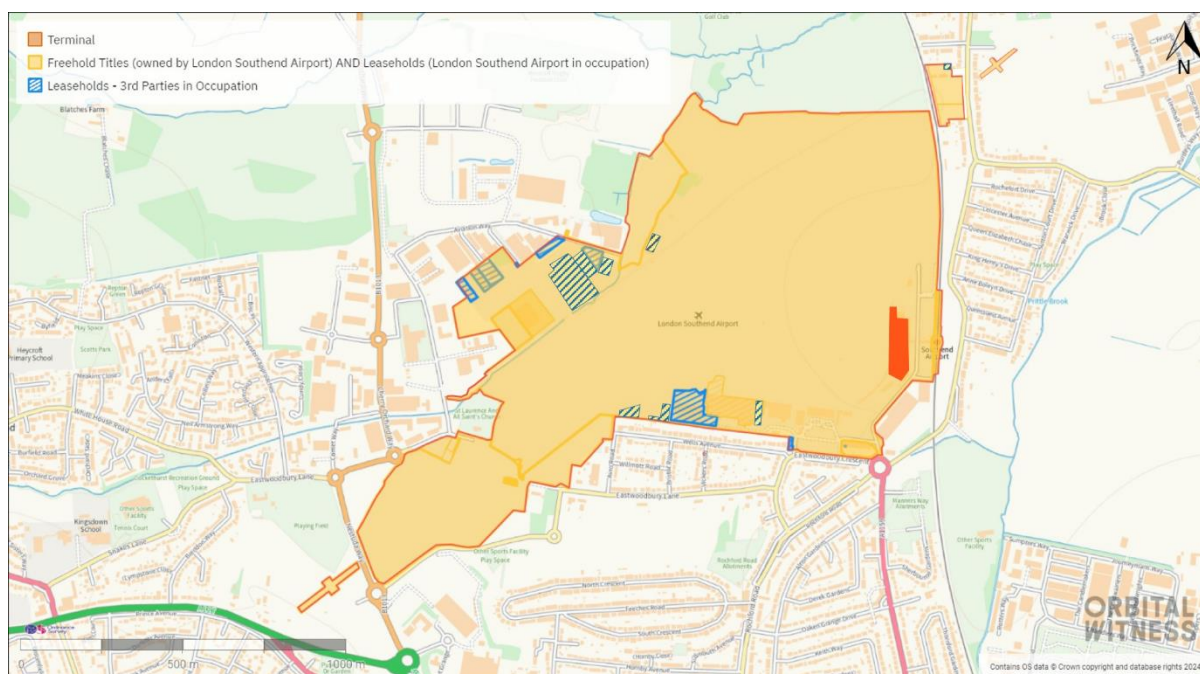
SCHEDULE 4 – PLAN B



SCHEDULE 5 – NOTICE
WARNING – NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted in Claim No. KB-2024-002596 granted on 14 August 2024 until 14 August 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, now exists in relation to London Southend Airport. The injunction means you may NOT without the express consent of (1) LONDON SOUTHEND AIRPORT COMPANY LIMITED, (2) LONDON SOUTHEND SOLAR LIMITED OR (3) THAMES GATEWAY AIRPORT LIMITED:

IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN ENTER, OCCUPY OR REMAIN UPON 'LONDON SOUTHEND AIRPORT' AS IS SHOWN EDGED RED ON THE PLAN BELOW:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED, OR HAVE THEIR ASSETS SEIZED.

A copy of the legal proceedings (including the Order, Amended Claim Form, Amended Particulars of Claim, Application Notice, evidence in support and a note of the hearing on 14 August 2024) can be viewed at <http://londonouthendairport.com/corporate/injunction> or obtained from:

- (1) Ticket Office, Southend Airport Train Station, Southend-on-Sea, Essex SS2 6YF, which is open between 9am-5pm Monday-Friday; or
- (2) Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR (Reference: AMRK/PSPE/3014634.1; Telephone: 020 3400 3119).

Anyone notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application. The address of the Court is the Royal Courts of Justice, Strand, London WC2A 2LL.

B E T W E E N:

- (1) LONDON SOUTHEND AIRPORT COMPANY LIMITED**
(2) LONDON SOUTHEND SOLAR LIMITED
(3) THAMES GATEWAY AIRPORT LIMITED

Claimants

-and-

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN
(WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHEND
AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO
THE AMENDED PARTICULARS OF CLAIM**

Defendants

**NOTE OF "WITHOUT NOTICE" HEARING BEFORE
& *EX TEMPORE* JUDGMENT OF MRS JUSTICE FARBEY
ON 14 AUGUST 2024**

The hearing commenced at 10:28 before Mrs Justice Farbey. Tom Roscoe ("TR") appearing for the Claimant.

Opening

1. TR expressed appreciation for the Court hearing the application on short notice during the vacation period. TR confirmed that J had sight of the hearing bundle ("HB"), authorities bundle ("AB") and the skeleton argument ("Sk."). A supplemental bundle ("SB") was handed up to J.
2. J confirmed she was aware this was a without notice application concerning an injunction against direct action by Just Stop Oil ("JSO") at London Southend Airport ("SEN"). TR confirmed yes and that, as emphasised in Sk., SEN is the only London, and one of the few national, airports without the benefit of such an injunction. Not to reduce the need to look at the facts, but this is relevant for 3 reasons:

- 2.1. First, SEN faces increased exposure as a result of its comparatively weaker protection and consequently, a higher risk of potential harm, which increases the appropriateness of an injunction;
 - 2.2. Second, this claim has similar facts as previous cases where other airports have recently gained injunctions. It would be anomalous if SEN was treated differently and left without this protection; and
 - 2.3. Third, the approach on the other airport injunctions, detailed in the SB, is informative of the appropriate procedure and practicalities.
3. TR proposed to make submissions in the following order:
 - 3.1. Threat posed by JSO and the risk of harm to SEN;
 - 3.2. Explanation for applying without notice;
 - 3.3. Discussion of the site and unique facts of SEN;
 - 3.4. Wording of the Draft Order;
 - 3.5. Submission of applicable legal principles (to the extent not previously covered); and
 - 3.6. Full and frank disclosure.

Threat and Risk of Harm

4. J confirmed she had read the witness statements. TR commented that there was lots of detail on the threat and risk of harm in the Claimants' witness statements and so highlighted a few important points, submitting that:
 - 4.1. JSO is a spin-off group of Extinction Rebellion ("XR") in that it shares a co-founder, Roger Hallam. Mr Hallam is currently imprisoned, and so not himself threatening direct action. HB p378, an article describing the creation of JSO. TR submitted that this article confirmed that JSO's foundational aims are stopping what they think ought not be done, going beyond expressing opinions about what should and should not be done;

- 4.2. HB p390, JSO website extracts about how it intends to operate and its “demands”; and
- 4.3. HP p396, JSO’s own statistics give a sense of the scale of their criminal or suspected criminal activities.
5. TR then took J to evidence of specific threats arising from JSO this summer. TR took J to a 16 July 2024 JSO press release/letter to the Prime Minister, threatening a campaign at airports (HB p409). On 22 July 2024, JSO stated it will undertake its threatened action. JSO released a statement referring to its previous ultimatum and stating that “no such assurances have been received, therefore JSO supporters will be taking action at airports this summer” (HB p414) . TR noted that JSO had indicated in this statement that it would carry out its actions in a non-violent and safe manner, and not carry out activities on active or unactive runways. It was also pointed out that JSO refers to itself as being an “A22 Network” member.
6. JSO has been raising funds – over £165,000 to finance its actions (HB p419). There is a Daily Mail report from March 2024 which detailed a JSO meeting infiltrated by an undercover reporter (HB p439). At HB p442, some of the techniques advocated for airport activists are detailed. These included: cutting through fences and gluing themselves to runway tarmac; cycling in circles on runways; climbing on to planes to prevent them from taking off.
7. J asked TR about JSO’s statement on 22 July 2024, suggesting they will not glue themselves to runways. TR responded that the later evidence would show that in practice this statement is not reliable.
8. TR directed J to the First Witness Statement of Marc Taylor (“**MT**”), at HB p37, setting out previous direction action at SEN from XR and JSO. He submitted that it would be wrong to think as a “more minor airport” (as some may describe it), SEN is not a target or any less at risk.
9. TR directed J to the First Witness Statement of Akhil Markanday (the “**BCLP WS**”) at HB p340, which describes and explains the actions recently perpetrated by JSO across other UK airports. TR submitted that the events demonstrate an intent to disrupt airport operations. At HB p487 the reaction of JSO to arrests for

these acts shows its members accept responsibility for legal consequences, but JSO express a defiant intention to continue its campaign.

10. J asked if, after their statement on 22 July 2024, JSO had evidenced any intention to attack or demonstrate on runways. TR confirmed it had, directing J by way of example to paragraph 39 of the BCLP WS, at HB p332, which details the arrest of four JSO individuals near Manchester Airport on 5 August, where they had been found with items which Police said would have been used to cause damage at airports. From this equipment, TR submitted an intention can be inferred to target runways (for example, fence cutting equipment and glue).
11. TR submitted that the potential consequences of these action are severe in the context of a complex operational environment with security and safety considerations. The consequences go beyond mere inconvenience or financial damage. At HB p39, MT describes the unique features of SEN which will be impacted, including at paragraphs 33(e) and (g).

Application Without Notice

12. J asked TR to take her through the key principles. TR focused on *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 W.L.R. 45. TR explained that at paragraphs 139, 142 and 151 of *Wolverhampton*, the Supreme Court clarified that these type of injunctions are always in substance a type of without notice injunction, in that they will affect (or potentially affect) a wide class of persons who are not and may never become defendants to the proceedings. The focus is not on service *per se*, but rather on notification of the proceedings and the Order made. TR noted that the present application was, however, “without notice” in the fuller sense.
13. J asked TR about his Sk., at paragraph 22.3, where he had submitted that prior notice may be self-defeating and that other similar airport injunctions were therefore without notice too. TR confirmed that to be the Claimants’ position, explaining that at paragraph 174 of *Wolverhampton*, the Supreme Court observed that prior notice of the proceedings may often be appropriate to minimise the potential for procedural unfairness, but generous liberty to apply was a protection in cases such as these.

14. J stated that this approach, granting injunctions with no return date so long as it did not outlive the threat, has been taken on the basis of Lord Reed’s analysis in *Wolverhampton* and asked TR whether that was the Claimants request also. TR confirmed this request here, with a review date and generous liberty to apply.

The Site

15. J asked TR to move discuss the land comprising SEN and the area sought to be injuncted (the “**Site**”). Before doing so, given the duty of full and frank disclosure, TR said he must highlight that JSO have announced a pause in disruption ‘whilst civil unrest is continuing to affect many towns and cities across the country’ (HB p465). J said she is familiar with this point.
16. TR introduced the discussion of the Site by highlighting one small defect in the plan exhibited at of the HB p16 (“**Plan A**”). Plan A, at the west of SEN, had a small area of blue hatching with white underneath. That blue area should be extracted and the red outline should track the south, not the north, of the blue area. J commented that this amendment will make the Plan simpler and gave leave to amend, if the order were granted.
17. J asked TR about the composition of Plan A and the colour key by which it depicts the title interests underlying the land. TR explained that the areas shaded yellow were areas where one or more of the Claimants had a leasehold or freehold interest which gave them an immediate right to possession. Where there was blue hatching, that was because a lease or licence had been granted to a third party which had the immediate right to possession, rather than the Claimants. J asked about the Claimants’ right to possession of the Terminal Building. TR confirmed that the whole Terminal Building is owned by the Claimants as freehold or leasehold. However, they do not have an immediate right to possession of all of it due to e.g. leases or licences to shops, restaurants etc, plus there are multiple floors making this hard to depict on a 2D map.
18. TR explained that the red outline shown in Plan A comes from the Airport Byelaws which, in conjunction with the Aerodrome Certificate awarded to SEN, exhibited HB p47, support the Claimants’ activities at SEN. HB p53 explains that the Byelaws were made pursuant to statutory powers authorising them and at HB

p76 there is a map reflecting the land to which the Byelaws apply. This outline of SEN shown by the map at HB p76 reflects the red outline shown in Plan A.

19. TR explained the Northeast runway lights. The lease underlying these is at HB p621. The lease is actually only granted in respect of the narrow area around each light, shown as green circles on the lease plan. Those small green circles cannot practically be reduced on the plan, hence the cross outline is matched to the Byelaws plan consistent with the Claimants' primary point on this.
20. TR submitted that the significance of the Byelaws, as seen by Section 4 of the Byelaws, exhibited at HB p56, is that the Claimants are empowered by statute to control what can or cannot be done in the entirety of SEN. TR gave examples of the prohibitions set out in the following Byelaws: 4(10), 4(12), 4(13), 4(15), 4(16), 4(19) and 4(22).
21. TR submitted that the underlying points were, first, that the Claimants have wide control over the SEN Site as empowered by statute and, second, this control gives sufficient standing to seek an injunction restraining trespass. TR referred to *Mayor of London v Hall* [2011] 1 WLR 504 and *Manchester Airport Plc v Dutton & ors* [2000] 1 Q.B.133 as authority for this, also referred to the move in the modern authorities away from the old common law action of ejectment based on an immediate right to possession.
22. TR submitted that, barring London City Airport, every other injunction sought by UK airports in recent months have taken this approach based on *Dutton* and *Hall* as proposed by the Claimants. J commented that she was familiar with the approach taken by other airports and asked questions specifically about the approach taken at Heathrow Airport. TR took J through the plan to the Heathrow Airport injunction, showing the same approach to third party (blue hatched) areas.
23. TR submitted that there were two further routes to found an injunction over the area outlined in red by Plan A. First, activities by JSO on the blue hatched land where the Claimants don't have an immediate right of possession would prevent the Claimants from reasonable enjoyment of their land, founding an action for nuisance. Second, as clarified in *Wolverhampton and Cuadrilla Bowland Ltd and other Persons Unknown and others* [2020] EWCA Civ 9, the Court can grant an

injunction to prohibit otherwise lawful actions (or by logical extension, actions that a claimant wouldn't itself have standing to seek an injunction in respect of) if such a remedy is proportionate and necessary to protect the Claimants' rights. J asked if this same argument applied to the Public Highway included in the red outline on Plan A. TR confirmed that it did.

24. J asked about the approach of London City Airport in carving out third party interests from the area over which they sought an injunction. TR took J through the plan to that injunction, noting that the same approach had not been followed in the subsequent cases.
25. With regard to Public Highways, TR referred J to Plan A, highlighting that the proposed area covered by the injunction included roads, which for the purposes of the application he accepted should be treated as being subject to public rights of way. In seeking an injunction over these areas, the Claimants were aware that the Human Rights Act 1998 ("**HRA**") was engaged to some extent. TR stated that though protest on the Public Highway is lawful to an extent, this should not be an impediment to gaining an injunction here for the following reasons:
 - 25.1. The Byelaws do not differentiate between private land and that subject to public rights of way. SEN has the same degree of control and power over both types of land, as seen by the outline at HB p76. J asked whether TR was contending that the Byelaws found trespass even regarding a public right of way. TR affirmed this. J accepted that where there was an overlay of the Byelaws over the Public Highway, there was, to some extent, a qualified right of way in effect.
 - 25.2. As an alternative argument, TR submitted that, as shown by *Wolverhampton*, the Court can restrict otherwise legal activity if it is proportionate to protecting to the Claimants' rights. TR contended that here, it would be very difficult and complex to carve out an exception from an otherwise clear injunction to provide for some limited right of protest on the roads. Consequently, the proportionate approach was that being sought.
26. J expressed concern about the injunction over the public access road prohibiting benign protestors, for example, simply holding placards over this land which is,

to an extent, their right. J asked TR where in *Wolverhampton* it was stated that it is within the power of the courts to restrict such rights if it is proportionate to do so. TR replied that *Wolverhampton*, drawing from *Cuadrilla*, states at paragraph 102 and (AB p299) if it is proportionate and there is no other way of protecting the Claimants' right, it is within the Court's power to do so.

27. J differentiated the present proceedings from *Canada Goose v Persons Unknown* [2022] EWCA Civ 13, on the basis the issue there was regarding newcomers and not the use of the public pavement.
28. J asked about the scope of the requested injunction and whether it caught too many potential protestors. J gave the example of a controversial political figure landing at SEN and protestors wanting to hold placards in response. TR responded that the injunction only applies to JSO and other environmental causes, and so would not apply in J's example. The Defendants are defined narrowly to reflect that.
29. Further, to the extent that there are peaceful protestors who wish to protest about environmental issues in a non-disruptive way, the Claimants could insert a recital setting out a procedure to gain SEN's consent to do so in a designated area. Such a recital was seen in the injunction order obtained by Gatwick Airport (SB p97), as well as Bristol Airport (SB p119) and Liverpool Airport (SB p130). TR took instructions confirming that SEN was amenable to including such a recital.
30. J asked for this recital to be made in any order so that the Court can ensure it is fulfilling its obligations under the HRA. That was in accordance with the necessity and proportionality analysis mandated by the HRA.

The Order

31. J commented the draft was in fairly standard terms. TR agreed and would only draw attention to some specific points.
32. J commented on the wording from the outset, stating that there must be a burden on the Claimants' solicitors to fix a review date. The onus should not be on the Court to manage an injunction once granted. J suggested wording be inserted at

paragraph 3 of the Draft Order to effect that *'the Injunction set out at paragraph 1 shall lapse at 4pm on the anniversary of the order or, as the case may be, the latest annual review, unless before then the Claimants have applied for a review to take place'*. J clarified that the burden on the Claimants is to apply for the review in a timely manner, noting it is not within their powers to ensure a listing within a specific time period.

33. J commented that the Claimants' request that the Order be granted for five years, appeared to be a considerable period of time. TR confirmed that five years was consistent with several of the recent airport cases, and he understood that this was consistent with earlier injunctions in respect of oil refineries. In fact several airports had even been granted an open ended injunction subject to an annual review. TR noted that, in either case, it was the annual review that was the important provision – with the longstop date being less significant. J confirmed that, if granted, her preference was not for the injunction to be open ended, but should be for five years, with annual review.
34. TR highlighted the Claimants' approach to defining the Defendants, explaining the decision to use "in connection" rather than "for the purpose of" so as to reduce the need for any investigation into any person's subjective intentions. J said this may not make a big difference, but agreed "in connection" was preferable.
35. TR took J to the provisions in the draft order for service/notification, explaining that, following *Wolverhampton*, the focus is on notification as opposed to service. The notification of the Order and the Court papers is what is most important in engaging the Defendants in the proceedings, as opposed to service of a Claim Form. TR listed the means of notification proposed by the Defendant as stated in the Draft Order. J agreed that JSO would be cognisant of the Order and proceedings by way of the means of notification suggested by TR, also referring to the similar steps employed by other airports following the recent injunction cases. TR explained where notice would be posted by reference to Plan B (HB p30).
36. For completeness, TR asked that an order be made to regularise service. He noted that some of the earlier cases had not said anything about service, others had

dispensed with service and others had make orders for alternative service. TR explained that the Claimants were seeking an order for alternative service.

The Legal Principles

37. TR noted the Sk. covered this in detail.
38. J asked TR to address the traditional *American Cyanamid* test and how that interacts with *Wolverhampton*, noting that *Wolverhampton* attempts to protect the potential defendants unable to defend themselves in Court. In *Wolverhampton* (AB p318, paragraph 167(1)), Lord Reed commented on the requirement for a ‘compelling need’.
39. TR replied by referring J to *Shell UK Oil Products Ltd v Persons Unknown* [2022] EWHC 1215 (KB) which pre-dates *Wolverhampton* but provides a helpful exposition of the principles applicable to injunctions of this sort, at AB p254. The principle listed at (4) appears to be an additional requirement for something more to the first three principles which are the *American Cyanamid* principles. Ultimately, there is a recognition, seen in *Wolverhampton* also, that we are not in final or interim relief territory, rather we are somewhere in the middle.
40. J discussed the interaction between the requirement stated by some cases of a ‘compelling need’ and the *American Cyanamid* test, asking whether it is right that if there is a compelling need, then one could only go down from there in seeking to meet the *American Cyanamid* test. TR agreed with that proposition.
41. TR further noted that in considering these principles, the existence of the Byelaws and the fact that the police may take an interest is relevant to the Court’s analysis.
42. J accepted that the possible breach of the Byelaws is relevant to the question of whether there is a ‘compelling need’ for the injunction but questioned whether this was determinative. TR submitted that a key considerations were whether the Claimants should be allowed to vindicate their civil rights, notwithstanding these rights overlay with criminal law, and whether there was utility to the injunction in addition to the criminal law/Byelaws.

43. J asked whether, on the facts, the injunction would be a deterrent. TR submitted it would, referring to the social media post by JSO, exhibited at HB p522, which shows evidence of JSO adapting their actions based off whether an airport has the protection of an injunction.

Full and Frank Disclosure

44. TR recognised the importance of ensuring this duty was complied with. TR referred J to Sk. p15 and emphasised the following:

44.1. The Defendants may argue that the application should not have been without notice. TR repeated the Claimants' submission that it may be self-defeating if the application was made with notice;

44.2. The fact that JSO had stated a pause in action. TR submitted that there is still an imminent and serious risk of harm to SEN as who knows when they may decide any pause ends;

44.3. The availability of criminal remedies. In response, TR submitted that it is necessary for the Claimants to vindicate their civil rights and obtain an injunction, notwithstanding the potential action from JSO engaging the criminal law and jurisdiction of the police;

44.4. It appears that the injunctions may have been disobeyed at other airports. He submitted that this is not a relevant consideration, as the Court must proceed on the basis that its orders will be obeyed;

44.5. TR noted that the Defendants would no doubt wish to emphasise their important and genuinely held beliefs. Though JSO and similarly orientated groups have important beliefs, these beliefs are irrelevant to the relief sought, and the earlier authorities have emphasised that the Court should not be considering such matters in any detail;

44.6. TR repeated the risk that the injunction sought, in prohibiting any entry onto the Site in relation to JSO or other environmental campaigns, may, as relates to the Public Highway, prohibit an element of lawful action. However, recent caselaw has shown that in circumstances as arise in this

case, the Court has the power to prohibit such lawful action where, as here, it is proportionate to do so to vindicate the Claimants' rights; and

44.7. J agreed the Court should act on the basis that orders will be obeyed and stated that the procedural aspects of the injunction should give some relief to any human right concerns. J commented on importance of the right to protest under the HRA and the common law, highlighting that it was open to JSO to challenge the Order.

45. At 11:52, J stated that she would grant the Order subject to reviewing a clean copy of the Draft Order, after the requested amendments had been made. J also stated she wished to deliver a judgment. Court was adjourned until 14:00.

Court resumed at 13:57, with J delivering an ex tempore judgment The following note of that judgment is not and does not purport to be an official or Court-approved transcript.

Judgment of Farbey J

- (1) By a Part 7 Claim Form issued on 12 August 2024, the Claimants seek an injunction to restrain the Defendants from acts of trespass or nuisance on the Claimants' land. By an Application Notice issued on the same day, the Claimants seek a without notice interim injunction, together with an order for alternative service of the claim documents and injunction order.
- (2) I have heard submissions today from Mr Roscoe on behalf of the Claimants. As this was a without notice application, no representative from the Defendants appeared.
- (3) The First Claimant is the operator of London Southend Airport, situated in Essex. The Second and Third Claimants are subsidiaries of the First Claimant. Together, the Claimants hold the underlying legal interests in the land comprising the Airport. I have been provided with a plan showing the location of the Airport.
- (4) The Defendants are properly described as Persons Unknown. Persons Unknown are adequately defined as those who, in connection with Just Stop Oil or other environmental campaign, enter, occupy or remain without the Claimants' consent

upon 'London Southend Airport' as is shown edged red on Plan A which is attached to the amended Particulars of Claim.

Nature and terms of the proposed injunction

- (5) I was provided with a supplemental bundle containing previous airport injunctions. This is the 13th set of proceedings since June 2024 appearing before the Court where airports have sought, in similar terms, injunctions against anti-fossil fuel campaigners. In each case, the Claimants have relied upon principles handed down in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 W.L.R. 45.
- (6) A key part of the proposed injunction is that the Defendants must not remain, enter or occupy London Southend Airport in connection with JSO or other environmental campaign.
- (7) The terms of the draft injunction provide that it shall expire in five years, on the long stop date of 14 August 2029. The injunction may be discharged before then by further order of the Court. There is a provision in any event for annual review of the terms of the injunction in this Court.
- (8) Although the application is without notice, the proposed order provides that anyone served with or notified of the proceedings and the Order, may apply to the Court at any time to vary or discharge the Order, giving the Claimants' solicitors 72 hours' notice. The service and notification provisions of the Order broadly reflect those given to other airports in recent months.
- (9) The Application is supported by witness evidence from the Claimants' acting CEO and a partner in the firm of the Claimants' solicitors.
- (10) That the Application is to be made without notice is at tension with the Human Rights Act 1998. However, I am content that there is a compelling reason for the Application to be made without notice.
- (11) In proceedings such as this, the Claimants are under a duty of full and frank disclosure to the Court. I am satisfied this duty has been discharged. Mr Roscoe

has raised points the Defendants were likely to have raised, covering both procedural and substantive issues.

- (12) I have kept at the forefront of my mind duty as a public authority under the Human Rights Act 1998, and the Defendants' rights of freedom of expression (Art. 10) and freedom of assembly (Art. 11), enshrined under the Human Rights Act 1998 and European Convention on Human Rights. However, these are not absolute rights and are qualified by reference to a range of public interests.

The Evidence

- (13) The evidence before me indicates JSO and other environmental groups have targeted London Southend Airport on numerous occasions in the past. For example, on 23 November 2021, 12 JSO activists entered the terminal with three large oil drums. JSO activists challenged passengers and the police were called. Some JSO individuals exploited the distraction in the terminal to conduct an airside breach.
- (14) The Claimants have provided evidence of the threatened unlawful activities at airports by environmental campaigners, including JSO, as part of a co-ordinated campaign against airports this summer. It is sufficient to give two examples. First, a Daily Mail article dated 9 March 2024, details a meeting where JSO co-founder Indigo Rumbelow advocated causing disruption at airports, including cutting fences, activists gluing themselves onto runways, cycling in circles on runways, climbing onto aircraft and staging multi-day sit in protests in the airport's buildings. Second, a press release by JSO dated 22 July 2024 stated that JSO will undertake all steps to ensure safety is not compromised and avoid active or inactive runways. However, since then, JSO activists have been apprehended on the perimeter of Heathrow Airport and found with equipment consistent with an intention to glue to runways.
- (15) I note too that JSO may find it difficult to accurately assess the risks to airport users as they may be ignorant of the complexities of the health and safety risks arising at an airport, especially with regard to passenger and cargo operations.

- (16) On 5 August 2024, JSO activists were arrested near Manchester Airport for conspiring to cause public nuisance. These activists were found equipped with items demonstrating an intention to damage and disrupt an airport.
- (17) On 7 August 2024, JSO released a press statement claiming a pause in their campaign of disruption at airports. I accept that by definition the pause will be a temporary state of affairs.

Risk of Harm

- (18) London Southend Airport estimates it will serve 33-37,000 passengers every month in the remainder of the summer. I accept the Claimants' evidence regarding the severe risk of physical and financial harm posed by JSO. The evidence shows that this severe risk is exacerbated by unique features of London Southend Airport. Specifically, the direct walk passengers undertake from the terminal building to board the plane, as opposed to using a bus or jet bridge. Other impacts of the actions threatened by JSO include significant disruption to travel plans, financial losses, significant disruption to business and perishable cargo.

Causes of Action

- (19) The principle cause of action relied upon is trespass. Mr Roscoe has shown me a plan reflecting the land that is under the Claimants' control as operator of London Southend Airport. The Claimants have the immediate right of possession to most of this by reason of their freehold or leasehold ownership. Some parcels of land, such as the terminal building, are leased or licenced to third parties but still remain under the control of the Claimant by virtue of the statutory Byelaws. The NE approach lights are on third party land not part of the airport. Within the areas of the land sought to be covered by the injunction, there is included some roads which are public in that public has some rights of access over this land.
- (20) The approach to the land covered by the injunction is intended to be practical and effective. To the extent that it includes land over which the Claimant holds the unencumbered freehold and leasehold, the cause of action is uncontroversially trespass. In relation to the land that is sublet, I accept the control given to the

Claimants by the Byelaws is sufficient to found trespass (*Mayor of London v Hall* [2011] 1 WLR 504).

- (21) In relation to the public access roads, the Byelaws ensure that the rights of the public on this land are qualified and do not exist to the actions which the injunction prevents.
- (22) In short, I am satisfied that the Claimants have a cause of action in trespass and the terms of the injunction are proportionate. This mirrors the approach at Heathrow Airport and the injunctions granted to other airports.
- (23) In any event, I accept the Claimants' submission that the anticipated activity of the activists would amount to actionable nuisance which would give rise to an injunction.
- (24) For these reasons, I am satisfied the Claimants have at least one cause of action.

The Legal Test

- (25) Mr Roscoe's oral submissions considered the *American Cyanamid* test and the heightened scrutiny suggested by *Wolverhampton* where the Defendants are not present and as a matter of realism, may not seek liberty to apply to challenge the Order before the annual review (*Shell UK Oil Products Ltd v Persons Unknown* [2022] EWHC 1215 (KB))
- (26) I am in no doubt that there is a serious question to be tried. Mr Roscoe submits that damages would not be an adequate remedy for the Claimants, relying on evidence from the Claimants by way of the First Witness Statement of Marc Taylor that the potential economic damage to London Southend Airport would be severe. There is no reason to think any of the Defendants could award such an award of damages. This is separate to the other harms which may arise which are not readily quantifiable in damages. Mr Roscoe has pointed out that the Claimants have offered a cross-undertaking in damages. Those concerned about the aviation industry are free to articulate their concerns in a lawful manner.
- (27) The balance of convenience consideration does not strictly arise here. In any case, this falls strongly in favour of granting the relief sought by the Claimants. The

threats faced by London Southend Airport are real and serious, the potential consequences of such threats being actioned would be financial, health and safety and wider disruption.

- (28) The First Witness Statement of Marc Taylor states that London Southend is a prime target for disruptive direct action, given the campaign intends to disrupt airports and given London Southend's size and geographical location, it is especially vulnerable. This is exacerbated by the fact that all other major airports in the UK have the protection of an injunction. On the basis of this evidence, I accept Mr Roscoe's submissions and conclude the balance of convenience falls strongly in favour of granting the relief sought.
- (29) To the extent that some higher threshold might apply to injunctions of this sort, I accept that there is both a significantly real risk of imminent damage to justify the grant of the injunction (*Shell* at 23 (4)) and a compelling need sufficiently demonstrated by evidence for the protection of civil rights (*Wolverhampton* 1671).
- (30) I accept that the Byelaws would be a slow and unwieldy mechanism to stop the disruption.
- (31) Statements by JSO social media accounts encouraging prospective JSO supporters to check whether an airport is protected by an injunction before protesting, emphasise that the Byelaws by themselves are not seen as a sufficient deterrent.
- (32) Finally, coming onto the Article 10 and 11 rights of the Defendants. As already said, these are qualified rights. My attention has been drawn to Leggat's LJ's dicta in *Cuadrilla* at paragraph 94 where he said that: "*the disruption caused was not a side-effect of a protest held in a public place but was an intended aim of the protest. As foreshadowed earlier, this is an important distinction. It was recently underlined by a Divisional Court (Singh LJ and Farbey J) in Director of Public Prosecutions v Ziegler [2019] EWHC 71 (Admin); [2019] 2 WLR 1451, a case – like the Kudrevičius case – involving deliberate obstruction of a highway. After quoting the statement that intentional disruption of activities of others is not "at the core" of the freedom protected by article 11 of the Convention (see paragraph*

44 above), the Divisional Court identified one reason for this as being that the essence of the rights of peaceful assembly and freedom of expression is the opportunity to persuade others (see para 53 of the judgment). The court pointed out that persuasion is very different from attempting (through physical obstruction or similar conduct) to compel others to act in a way you desire”

- (33) Recent caselaw has also confirmed that Art 10 and 11 do not justify trespass in relation to privately owned land (*DPP v Cuciuraan* [2022] 3 WLR 446 at paragraphs 42-50).
- (34) Applying these principles and taking into consideration all that I’ve read and heard, I take the view that the injunction is no more than a necessary and proportionate qualification of the Defendants' Art 10 and 11 rights.
- (35) For these reasons, I allow the injunction and grant:
 - (a) permission to serve the proceedings as per the draft Order; and
 - (b) permission to amend the claim documents to amend minor errors and certain other technical changes.
- (36) I will make the order in terms now sought which differ from some degree to the draft filed to the Court. I have been provided with both a tracked changes and clean copy of the amended Order and claim documents. On the basis of the clean copy, I make the order in terms now sought.

Certificate of service

Name of court High Court of Justice, King's Bench Division	Claim No. KB-2024-002596
Name of Claimant (1) London Southend Airport Company Limited (2) London Southend Solar Limited (3) Thames Gateway Airport Limited	
Name of Defendant PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS CONSENT) UPON 'LONDON SOUTHEND AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE PARTICULARS OF CLAIM	

On what day did you serve?	20/08/2024
The date of service is	20/08/2024

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Injunction Order, Amended Claim Form, Amended Particulars of Claim, Application Notice, evidence in support and a Note of the Hearing on 14 August 2024

On whom did you serve?
(If appropriate include their position e.g. partner, director).

The Defendants as required by Paragraphs 7-13 of the Order of Farbey J dated 14 August 2024

How did you serve the documents?
(please tick the appropriate box)

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify)

☒ by other means permitted by the court (please specify)

By the methods and at the locations prescribed by paragraphs 7-8 of the Order of Farbey J dated 14 August 2024

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)

☐ by other electronic means (.....time sent, where document is other than a claim form) (please specify)

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the	☐ claimant's	☒ defendant's
	☐ solicitor's	☐ litigation friend
☐ usual residence		
☐ last known residence		
☐ place of business		
☐ principal place of business		
☐ last known place of business		
☐ last known principal place of business		
☐ principal office of the partnership		
☐ principal office of the corporation		
☐ principal office of the company		
☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim		
☒ other (please specify)		
Locations specified at paragraphs 7-8 of the Order of Farbey J dated 14 August 2024, pursuant to paragraph 11.2 of which service was deemed completed at 15:58 on 20 August 2024		

I believe that the facts stated in this certificate are true.

Full name	Philip Keith Spencer		
Signed	DocuSigned by: Philip Spencer 656A85CC3CB44E1... Claimant's solicitor	Position or office held	Senior Associate at Bryan Cave Leighton Paisner LLP (If signing on behalf of firm or company)
Date	29/07/2025		

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR JUSTICE BOURNE

ON: 24 June 2025

B E T W E E N : -

(1) LONDON CITY AIRPORT LIMITED
(2) DOCKLANDS AVIATION GROUP LIMITED

-and-

**PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR
OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN
(WITHOUT THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND
KNOWN AS LONDON CITY AIRPORT (AS SHOWN FOR IDENTIFICATION
EDGED RED ON THE ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS
OF LAND AS FURTHER DEFINED IN THE CLAIM FORM**



Defendants

ORDER

PENAL NOTICE

**IF YOU, THE DEFENDANTS, 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 OR ANY OF THEM TO
BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE 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 certain acts. You should read this Order very
carefully. You are advised to consult a solicitor as soon as possible. You have the right to
apply to the court to vary or discharge this Order (which is explained below).**

UPON the injunction made by Order dated 20 June 2024 by Mr Justice Julian Knowles (“**the Knowles J Order**”)

AND UPON the Claimants’ application dated 2 June 2025

AND UPON the Claimants’ application dated 17 June 2025 to amend the claim form

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (“**the Claims**”)

AND UPON reading the application and the witness evidence in support

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Knowles J Order

IT IS ORDERED that:

1. The Knowles J Order shall remain in full force and effect, subject to the variations thereto set out in the schedule to this order (and subject to review, as provided for in paragraph 3 of the Knowles J Order).
2. The Claimants have permission to amend the claim form to substitute the plan annexed to the Claimants’ application dated 17 June 2025 for Plan 1 to the claim form.
3. The court will provide sealed copies of this order to the Claimants’ solicitors for service or notification in accordance with paragraph 9 of the Knowles J Order.

Varied pursuant to the order of Bourne J dated 27 June 2025

**IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION**

CLAIM NO: KB-2024-001765

**Before Mr Justice Julian Knowles
On 20 June 2024**

BETWEEN:-

- (1) LONDON CITY AIRPORT LIMITED
(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

- v -

**PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR
OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT
THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON
CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE
ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER
DEFINED IN THE CLAIM FORM**

Defendant

ORDER

PENAL NOTICE

**IF YOU THE WITHIN DEFENDANTS OR 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 OR PERSONS UNKNOWN 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 AND PERSONS UNKNOWN

**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 Claimants' claim by Claim Form, dated 12 June 2024

AND UPON hearing the Claimants' application for an interim injunction, dated 12 June 2024, and supporting evidence, without Persons Unknown being notified

AND UPON hearing Counsel for the Claimants

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the "Land" being defined as that land known as London City Airport, as shown for identification edged red on the attached Plan 1 in Schedule 1, but excluding:

- a. Those buildings shaded blue on Plan 1;
- b. In those buildings shaded green on Plan 1, the areas edged blue on Plans 2-8;
- c. In those areas shaded purple, the land suspended over the ground and forming part of the Docklands Light Railway.
- d. In the areas shaded pink, the underground rail tunnel, the subway and that part of Docklands Light Railway located below ground level.

IT IS ORDERED THAT: INJUNCTION

1. Until 20 June 2029 or final determination of the claim or further order in the meantime, whichever shall be the earlier, Persons Unknown must not, without the consent of the Claimants, enter, occupy or remain upon the Land.
2. In respect of paragraph 1, Persons Unknown must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
3. The injunction contained at paragraph 1 of this Order shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list) ~~with a time estimate of 1.5 hours.~~ Such hearing shall be listed to be heard with the review of any injunctions made in all or any of the claims with case numbers KB-2024-002132, KB-2024-002317, and KB-2024-002473, with a time estimate of 1 day. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the review hearing.

VARIATION

2

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must

first give the Claimants' solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimants have liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

7. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and Note of the Hearing on 20 June 2024 will be notified to Persons Unknown by the Claimants carrying out each of the following steps:
 - a. Uploading a copy onto the following website:
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
 - c. Either affixing a notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9(d) below.
9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to Persons Unknown by the Claimants carrying out each of the following steps:

- a. Uploading a copy of the Order onto the following website:
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
 - c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 1.
 - d. Affixing warning notices of A2 size at those locations marked with an "X" on Plan 1.
10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to Persons Unknown of any further applications shall be effected by the Claimants carrying out each of the following steps:
 - a. Uploading a copy of the application onto the following website:
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>.
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
 - c. Affixing a notice at those locations marked with an "X" on Plan 1 stating that the application has been made and where it can be accessed in hard copy and online.
11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(a)-(b) only.
12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8(c), 9(c)-(d) and 10(c), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

14. Liberty to apply.
15. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANT

16. The Claimants' solicitors and their contact details are:

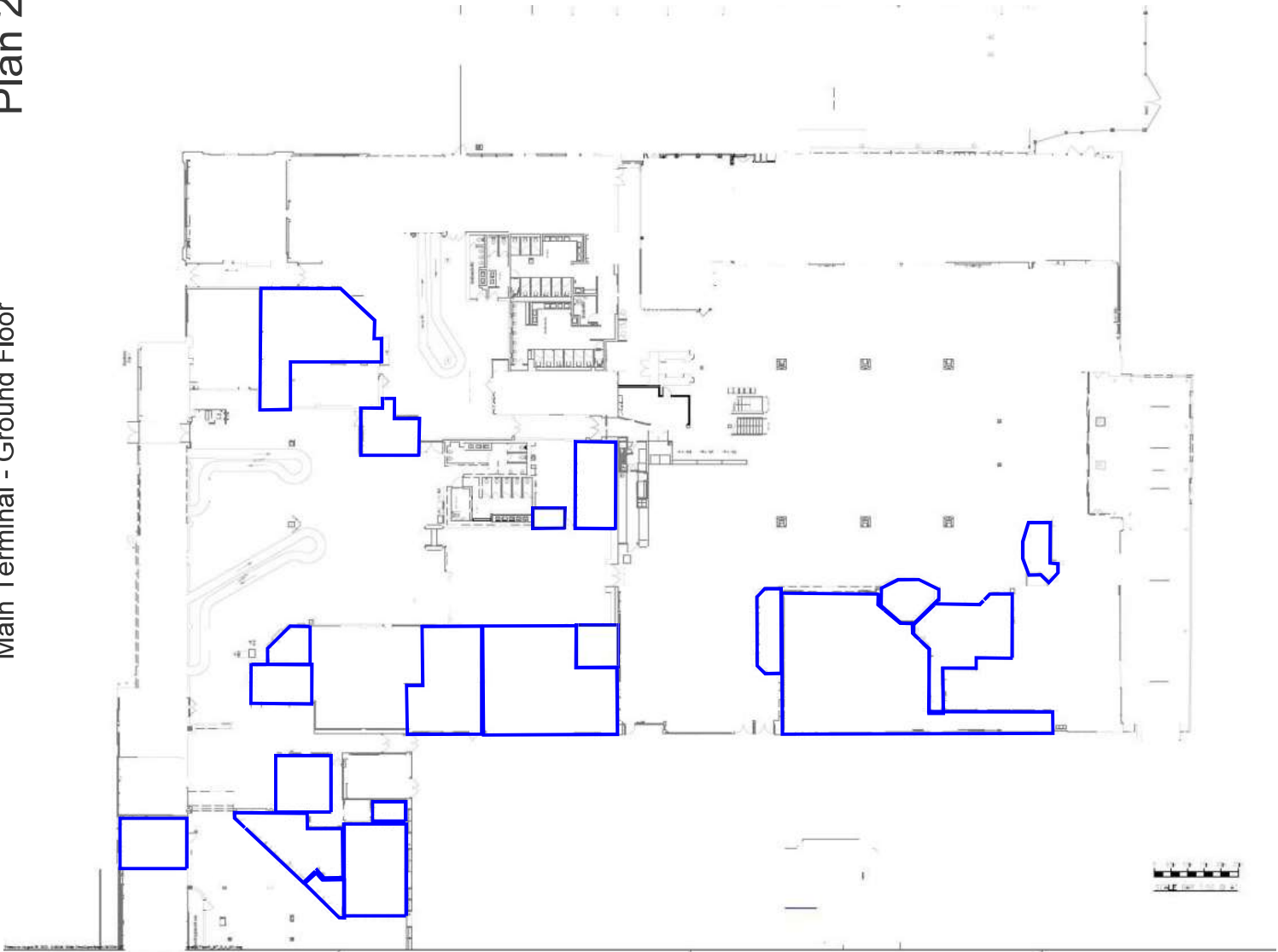
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

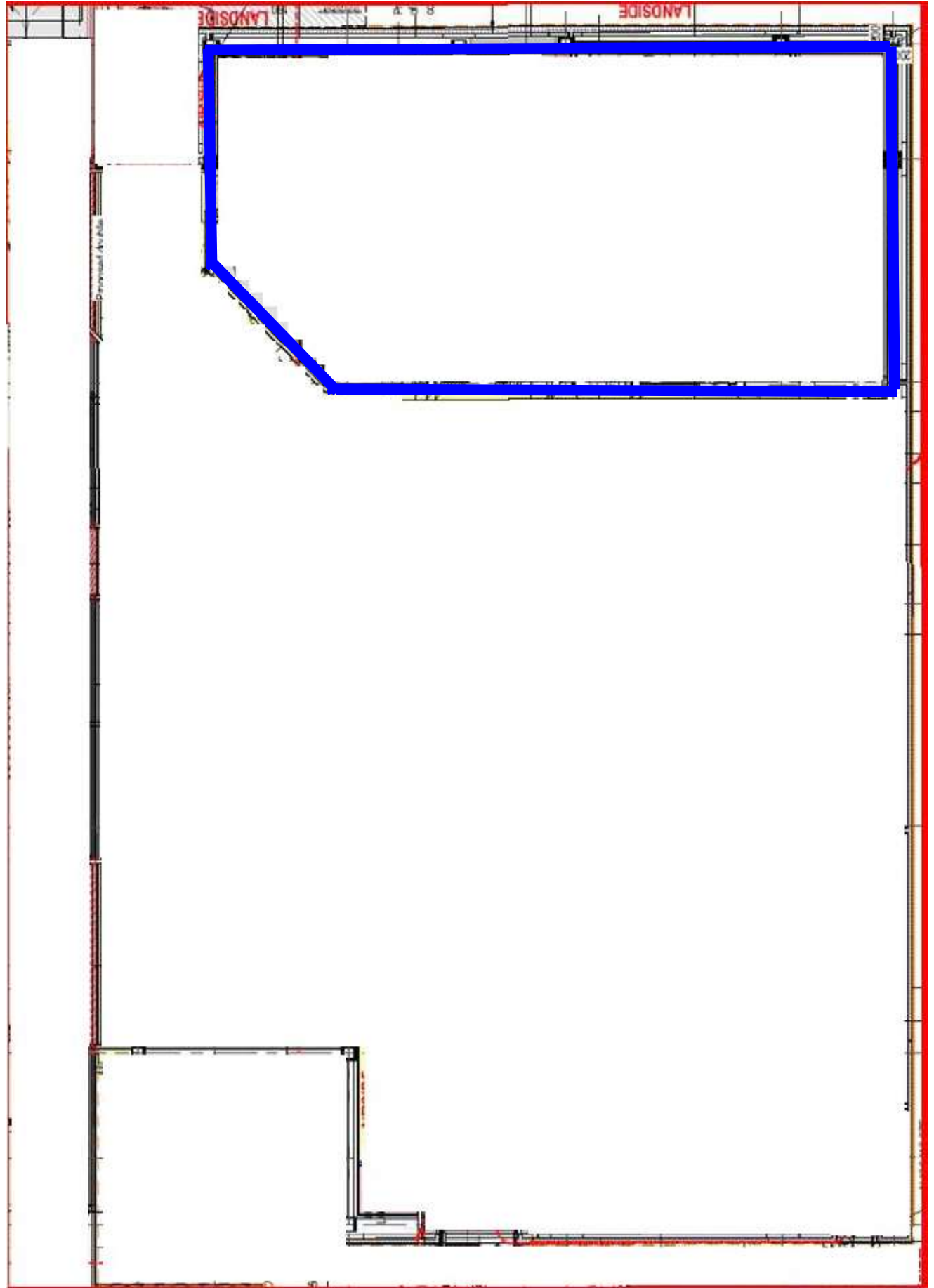
(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

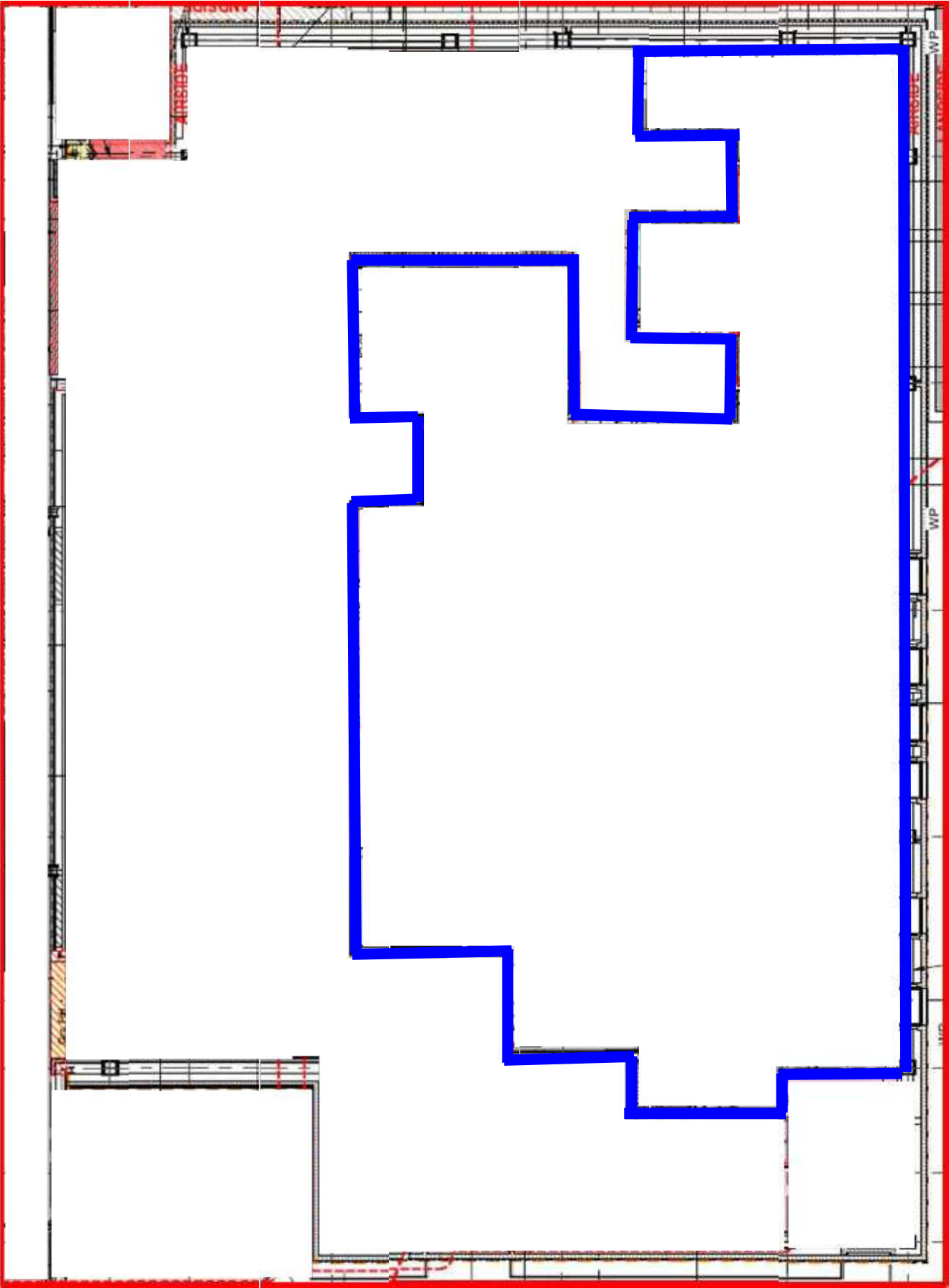
Dated: 20 June 2024

SCHEDULE 1 - PLANS



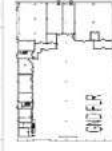
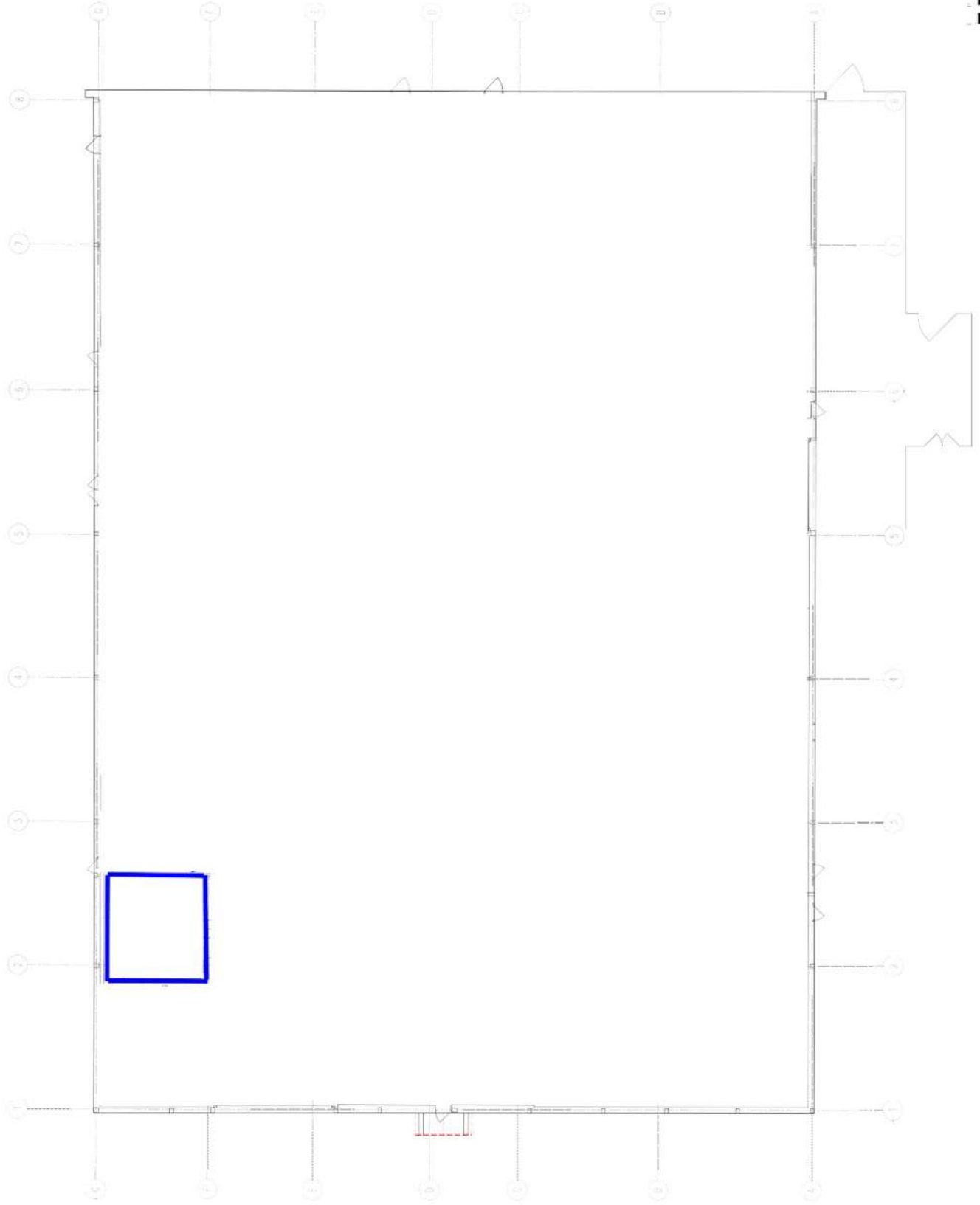


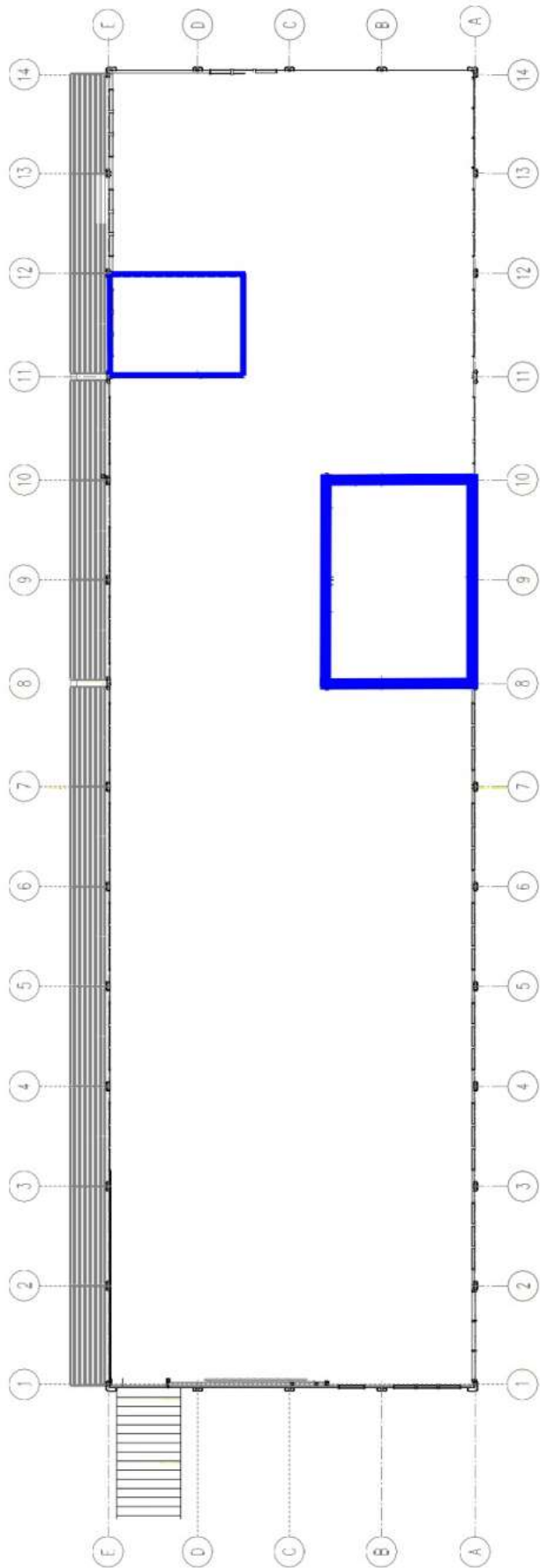




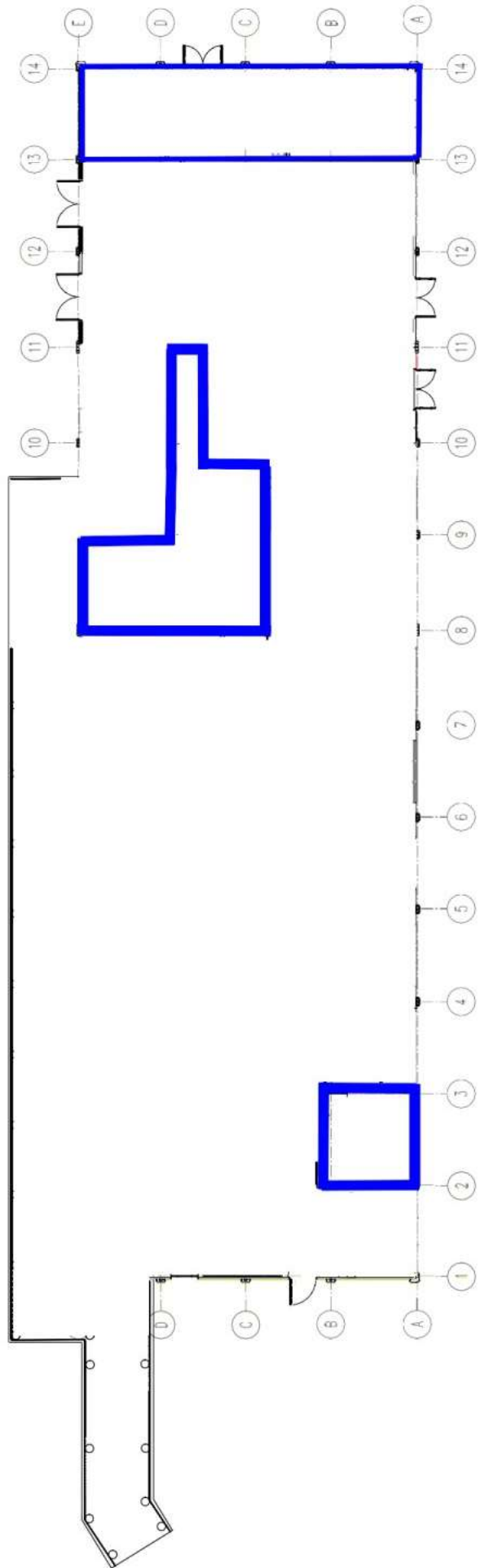
Plan 5

Blue Shed - Ground Floor





Jet Centre - First Floor





2	spiral notebook - One Year	15/09/10
2	spiral notebook - One Year	06/07/10
2	spiral notebook - One Year	06/07/10
2	spiral notebook - One Year	06/07/10
2	Woolite - Washable & Dry - Washable	06/11/10

04/07/08

LONDON CITY AIRPORT
London City Airport, 2000
 1000 City Road, London, UK EC3R 8LN

RECORD DRAWING

CITY AVIATION HSE

R/CAL/A-A/001

SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS

- (1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.
- (2) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Royal Courts of Justice
Strand
London, WC2A 2LL

Wednesday, 26th August 2025

BEFORE:

MR JUSTICE BOURNE

BETWEEN:

LONDON CITY AIRPORT LTD & ORS

Claimants

- and -

PERSONS UNKNOWN

Defendants

MR T MORSHEAD KC, MS E BARDEN (instructed by Eversheds Sutherland International LLP) appeared on behalf of the Claimant
THE DEFENDANTS were not present and not represented

JUDGMENT

(Approved)

Digital Transcription by Epiq Europe Ltd,
Lower Ground, 46 Chancery Lane, London WC2A 1JE
Web: www.epiqglobal.com/en-gb/ Email: civil@epiqglobal.co.uk
(Official Shorthand Writers to the Court)

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1. MR JUSTICE BOURNE: At this hearing I conducted the first annual review of injunctions granted at the separate hearings of four claims last year, concerning activities by environmental protestors at a total of ten airports at different locations in England. The relevant airports are identified in each order.
2. The claimants were represented by Mr Morshead, King’s Counsel and Ms Baden of counsel. There was no appearance by any defendant or by anyone expressing opposition to the continuation of the injunctions.
3. The injunctions were sought because in 2024, airports in England and elsewhere became targets in campaigns of disruptive environmental protest, notably by the campaigning group, “Just Stop Oil” (“JSO”). Individual airports and groups of airports sought injunctive relief against “Persons Unknown”, invoking the “newcomer” jurisdiction as explained by the Supreme Court in *Wolverhampton City Council v London Gypsies and Travellers* [2023] UKSC 47, [2024] 1 AC 983 (“Wolverhampton”).
4. I have read the judgments given when the original injunctions were granted of Julian Knowles J (20 June 2024, KB-2024-176) HHJ Coe KC (5 July, KB-2024-002132) and Ritchie J (19 July 2024, KB-2024-002317). I have also seen a note of what was said by Jacob J in KB-2024-002473 on 6 August 2024.
5. By way of context, I note that orders were also made at hearings in other claims concerning Heathrow (Julian Knowles J, 24 July 2024), Gatwick (Ritchie J, 19 July 2024) and Southend Airports (Farbey J, 14 August 2024). This review does not encompass those three cases.
6. Each judge was satisfied that an injunction was necessary to restrain the threat of tortious conduct and that it was just and convenient to make an order. In particular, because of threats of unlawful action by protest groups, viewed in the light of some previous incidents, and the potential for such action to cause health and safety risks (to the public, airport staff, emergency services and/or the protestors themselves) and delay and disruption to the public. In addition, each judge was satisfied that it was appropriate to grant injunction against “Persons Unknown.”

7. I shall note increase the length of this judgment or extend the corpus of judicial discussions of this broad subject by repeating the statements of legal principle and factual considerations, which were set out by the judges when granting the injunctions last year.
8. It is, in particular, unnecessary for me to explore some distinctive characteristics of these cases which were considered by the judges, notably the fact that the claims concern a combination of (1) land owned by the claimants, (2) land not owned by the claimants but on which there is airport infrastructure and (3) public highways in and around the airports. The injunction granted to London City Airport covers land in category (1) only, whereas the injunctions in the other three cases cover all three categories. The claimants are not seeking any geographical expansion of the injunctions granted last year. London City Airport seeks, and I will grant, permission to amend to reflect a change of ownership of one specific area.
9. The nature of a review hearing of this kind was considered in *Wolverhampton* at paragraph 225, where the Supreme Court observed that the hearing:
- “...will give all parties an opportunity to make full and complete disclosure to the court, supported by appropriate evidence as to how effective the order has been, whether any reasons or grounds for its discharge has emerged, whether there is any proper justification for continuance; and whether and on what basis, a further order ought to be made.”
10. In *High Speed Two (HS2) Ltd & Anor v Persons Unknown* [2024] EWHC 1277 (KB), Richie J described the court’s task at a review hearing:

“Drawing these authorities together, on a review of an interim injunction against PUs [Persons Unknown] and named Defendants, this Court is not starting de novo. The Judges who have previously made the interim injunctions have made findings justifying the interim injunctions. It is not the task of the Court on review to query or undermine those. However, it is vital to understand why they were made, to read and assimilate the findings, to understand the sub-strata of the **quia timet**, the reasons for the fear of unlawful direct action. Then it is necessary to determine, on the evidence, whether anything material has changed. If nothing material has changed, if the risk still exists as before and the claimant remains rightly and justifiably fearful of

unlawful attacks, the extension may be granted so long as procedural and legal rigour has been observed and fulfilled.

33. On the other hand, if material matters have changed, the Court is required to analyse the changes, based on the evidence before it, and in the full light of the past decisions, to determine anew, whether the scope, details and need for the full interim injunction should be altered. To do so, the original thresholds for granting the interim injunction still apply.”

11. I have therefore considered whether, since last year’s injunction orders were made, there has been any material change affecting, diminishing or removing the need for them to be in place.
12. Each application for review is supported by a witness statement by Stuart Wortley, a partner in Eversheds Sutherland (International) LLP, who represent the claimants. He sets out a chronology of incidents and events, occurring both before and since last year’s injunctions.
13. Of the events postdating any or all of the injunctions, Mr Moreshead emphasises several, including the following:-
 - (a) On 19 July 2024, one of the JSO founders, Roger Hallam, was found guilty with others of conspiring to organised protests to block the N25 motorway in November 2022. He was sentenced to five years in prison, later reduced on appeal to four years.
 - (b) On 24 July 2024, ten JSO activists were arrested at Heathrow Airport, seemingly equipped to be able to cut through fences and/or affix themselves to parts of the land or aircraft. Of those individuals, nine were later found guilty by a jury of conspiracy to cause a public nuisance. Five were sentenced to terms in prison of up to 15 months, and four were given suspended sentences.
 - (c) On 27 July 2024 a protest which was due to occur at London City Airport, was relocated to the Department of Transport.
 - (d) On 29 July 2024, eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure.

(e) On 30 July 2024, two JSO activists were arrested at Heathrow Airport after spraying orange paint around the Terminal 5 entrance hall and on destination boards in the departure lounge. Following a criminal trial, the jury was unable to return a verdict.

(f) On 31 July 2024, a protest by JSO and Fossil Free London, was held at the Docklands Light Railway Station, at London City Airport. That being an area excluded from the red line of the injunction.

(g) On 1 August 2024, six JSO activists were blocked access to the departure gates at Heathrow Terminal 5.

(h) On 5 August 2024, five JSO activists were arrested on their way to Manchester Airport and were in possession of bolt cutters, angle grinders, glue, sand and banners reading “oil kills”. Four of these individuals were subsequently found guilty of conspiracy to commit a public nuisance and then sentenced to terms of imprisonment, ranging between 18 and 30 months.

(i) On 21 February 2025, XR held a demonstration at Inverness Airport against climate change.

(j) On 27 May 2025, JSO made an announcement which at least gave the impression that it had now decided to withdraw from mounting disruptive protests of a direct action nature.

(k) However, on 18 May 2025, GB News reported that JSO was considering a “dramatic U-turn” and on 21 May 2025, JSO sent a link to its subscribers with the comment, “GB News was right for once. We are ‘plotting a comeback’.”

(l) On 21 May 2025, London City Airport received intelligence information from the Metropolitan Police of a protest by environmental protest groups, which had been planned at Heathrow Airport, to be held at the Sofitel Hotel on 20 May 2025, where an annual general meeting for Shell was being held and which was within the redline boundary of the injunction obtained by that airport. The protest was relocated to the

Shell head office, “in order to avoid the risk of associated penalties for breaching the injunction.”

(m) Over the weekend of 14 and 15 June 2025, JSO arranged an event described as “Seeds of Rebellion”, which seemingly was part of a training programme – a “summer of resistance training” – where attenders would be taught how “to plan actions that cut through” and to “plant the seeds of the coming non-violent revolution.”

(n) JSO’s fundraising page currently invites donations for – “[A] New campaign [that] is in the works”

14. Mr Wortley’s evidence also mentions activities of other protest groups opposed to the use of fossil fuels including Youth Demand, Extinction Rebellion and Fossil Free London. He refers to disruptive protest activity in 2024 and 2025 by Extinction Rebellion, though not at airports. He also exhibited an email sent by the Metropolitan Police to London City Airport’s security team on 21 May 2025, which referred to the incident relating to the Shell AGM and said:

“...The injunction at [Heathrow Airport] had a real impact on the Shell protest yesterday and builds on your experiences. To remove an injunction now, would open up to further protest. And whilst JSO have stepped down, there appear to be a cycle of new groups emerging and this cannot be ruled out, so maintaining it would be very much recommended.”

15. I accept Mr Moreshead’s submission that that advice from the police is a relevant consideration. Although the announcement by JSO on 21 March 2025 could signal a reduction from the risk of unlawful activity at the airports, there is also clear evidence of a possible U-turn from that announcement. And, as Mr Morshead submits, even if JSO left the scene, it is too early to tell what the effect of that would be, having regard to the possibility of some JSO members continuing to support direct action, and to the continued existence of other protest groups. Nor is it possible to conclude that the risk has been materially reduced or removed by the imprisonment of some JSO activists referred to above.

16. Meanwhile, the substantial, though not total lack of direct action at the airports since the grant of the injunctions is consistent with the injunctions having proved to be an effective deterrent. I accept that removing the injunctions at present would create a real risk of a resumption of activity at airports.
17. When granting the injunctions, the judges last year concluded that enforcement of bylaws and criminal proceedings did not provide an adequate alternative remedy. That, in my view, has not changed.
18. In the circumstances considered as a whole, I conclude that there has been no material change which removes or seriously diminishes the justification or the rationale for the injunctions, and that they should continue in force.
19. Turning to the form of the order, Mr Morshead showed me the decision of Nicklin J in *MBR Acres Limited and Others v John Curtin & Persons Unknown* [2025] EWHC 331 (KB), which took a different approach of directing an injunction in a protest case, “**contra mundum**”, rather than by describing categories of defendants by reference to the conduct to be prohibited, which would also make service of the claim unnecessary. Nicklin J noted that the court must consider what other or better solutions may be available, having regard to enhanced police and local authority powers. He also indicated that orders should include a requirement that the court’s permission be obtained before any application is made to commit for contempt of court.
20. Mr Morshead submitted that it would be better in this case to retain a description of the intended defendants, by reference to the conduct being enjoined, and that that course was followed in a later decision of Soole J in *Chancellor, Masters and Scholars of the University of Cambridge v Persons Unknown* [2025] EWHC 724 (KB). He also submitted that a requirement for consent for committal proceedings should not be necessary, having regard to the safeguards built into the injunction and to the impact which applications for consent could have on costs and court resources.
21. In the present cases, the judges last year found it appropriate to describe or define the defendants by specific reference to the type of conduct to be enjoined. Although Nicklin J has identified a possible different approach, it seems to me that on a review

hearing, I should not change the approach taken by the previous judges, where the underlying circumstances have not materially changed. I am also mindful of the need, emphasised by the Supreme Court in *Wolverhampton* at paragraph 221, for defendants in injunctions to be defined as precisely as possible. It seems to me that that also favours a continuation of the approach taken last year.

22. Nor am I persuaded to depart from what was ordered last year by adopting a standard wording to define or describe the prohibited acts in the four cases before me. The differences in wording have not created any difficulty for me in conducting this review, and any potential defendant who has already become aware of the injunction in respect of any specific airport may already be aware of the existing wording, and that factor militates against a change.
23. I also accept the submission that it is not necessary to insert a provision requiring consent or permission to be obtained for any contempt application in the event of a breach of the injunction. Although such a provision could provide a helpful safeguard in some “**contra mundum**” cases, as described by Nicklin J in *MVR Acres*, in the present cases, no enforcement issue has arisen so far. That is by contrast with *MBR Acres*, where Nicklin J vigorously criticised the conduct of claimants who pursued a committal application, which he described as frivolous and bordering on vexatious. As Mr Morshead said, claimants who choose to commence committal proceedings for trivial breaches do so at their own risk. The courts have repeatedly said that, in cases which do not appear to have been cited to the court in *MBR Acres*, such as *Sectorguard Plc v Dienne Plc* [2009] EWHC 2693 (Ch), per Briggs J at paragraph 46. Meanwhile, in the circumstances of the present case, I have no reason to expect that such an issue will arise.
24. It seems to me, by way of confirmation, that the steps taken to publicise the orders last year, remain appropriate and sufficient.
25. I will provide for the next review to take place in one year from now. It will remain open for anyone to apply to vary or discharge the orders before then. The cases will again be listed together upon that occasion, but I see no need to consolidate them.

26. I shall ask counsel to finalise the terms of an order whose effect is that the injunctions granted last year will remain in force. For practical reasons, and in principle, that seems to me preferable to the alternative of granting entirely new injunctions.

Epiq Europe Ltd hereby certify that the above is an accurate and complete record of the proceedings or part thereof.

Lower Ground, 46 Chancery Lane, London WC2A 1JE

Email: civil@epiqglobal.co.uk

This transcript has been approved by the Judge

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

Royal Courts of Justice
Strand
London
WC2A 2LL

Friday, 18 July 2025

BEFORE:

MR DUNCAN ATKINSON KC
(Sitting as a Deputy High Court Judge)

BETWEEN:

GATWICK AIRPORT LTD

Claimant

- and -

**PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR
OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN
(WITHOUT THE CLAIMANT'S CONSENT) UPON THAT AREA OF LAND
KNOWN AS LONDON GATWICK AIRPORT (AS SHOWN FOR IDENTIFICATION
OUTLINED IN YELLOW AND SHADED YELLOW AND BLUE ON THE PLAN 1
ATTACHED TO THE CLAIM FORM**

Defendants

TIMOTHY MORSHEAD KC and EVIE BARDEN appeared on behalf of the Claimant.

APPROVED JUDGMENT

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1. MR DUNCAN ATKINSON KC: On 19 July 2024, the Honourable Mr Justice Ritchie granted an injunction order to the Claimant, Gatwick Airport Limited, which prohibited persons unknown from entering, occupying, or remaining on any part of the airport for the purposes of protesting about fossil fuel or environmental concerns. It was directed that this order should be subject to annual review, and that review has taken place before me today.
2. Gatwick Airport is the second largest in the United Kingdom, and the eleventh largest in Europe, with an average 11,000 passengers per day, or 44 million passengers per year, and with a revenue per annum of £1 billion. Gatwick Airport has statutory powers to make bylaws and under these bylaws persons are not entitled to protest or obstruct the airport or display protest banners and they must leave if requested to do so. They have implied consent to attend for travel and concessions have consent to run their businesses there. Peaceful protest is accommodated through prior arrangement. In addition, the airport's statutory obligations, contained within the Airport Act 1986, include a duty to mitigate risks, including risks relating to the movement of vehicles, to objects on the tarmac, and air navigation. If unsafe conditions arise, there is statutory duty for the airport to stop flights.
3. The context for the present application is the order that was made by Ritchie J last year. At that time, in the summer of 2024, a number of environmental protests groups, in particular Just Stop Oil and Extinction Rebellion, planned and undertook a campaign of disruptive protest at the use of fossil fuels and the environmental impact of air travel directed towards airports in the United Kingdom and beyond. Evidence considered by the Court last year referred to actual and planned protests at Farnborough, Stanstead, Gatwick and London City Airports. Just Stop Oil twice wrote to the Prime Minister, making demands and requiring compliance against the threat of their campaign of non-cooperation. The evidence identified the serious consequences of unplanned or uncontrolled protests as including a risk to emergency services by having to climb up structures, the knock-on effect on passengers, the effect in relation to jet engines which are sensitive and potentially hazardous, and implications in relation to fuel which could cause an explosion.

4. In another judgment of Ritchie J in response to the same issue in the case of *Leeds Bradford Airport v Persons Unknown* [2024] EWCA 2274, he said (at paragraphs 30 to 31):

"Airports are part of the national infrastructure which is acutely sensitive to terrorist threats and are highly regulated in relation to safety, maintenance and security. They are also complicated organisations involving the [movement] of thousands of members of the public, close to highly combustible materials and within fast-moving and huge pieces of equipment. Such organisations are acutely sensitive to chaotic dysfunction caused by unlawful direct action."

He went on:

"I also take into account the fear, which I think is justified, of the Chief Executive Officers, that terrorism is facilitated by chaos. I take into account the human rights of the passengers, adults and children, families and individuals, whose business trips and family holiday trips could be potentially catastrophically interrupted, delayed or cancelled by disruption at any of these airports in the summer seasons. Although not pleaded it is not irrelevant to take into account the knock-on effect on employment, union members and the businesses which are run in the airports and which run the airports, financially."

The law relevant to the injunction under review.

5. The injunctions granted by Ritchie J, both in the *Leeds Bradford* case and in the present proceedings, were directed towards persons unknown. That such orders are permissible was made clear by the Supreme Court in *Wolverhampton City Council and others v London Gypsies and Travellers and others* [2023] UKSC 47. Persons unknown, in this context, means persons who are not identifiable at the date the proceedings are commenced but who are intended to be bound by the terms of the injunction sought. Proceedings are typically a form of enforcement of undisputed rights rather than a form of dispute resolution.

6. Although the facts of that case focused on orders relating to members of the Traveller community, it was made clear that they were not limited to such cases. Indeed, the Court said (at paragraph 235) that “...nothing we have said should be taken as prescriptive in relation to newcomer injunctions in other cases, such as those directed at protesters who engage in direct action by, for example, blocking motorways, occupying the motorway gantries or occupying HS2's land with the intention of disrupting construction. Each of these activities may, depending on the all the circumstances, justify the grant of an injunction against persons unknown including newcomers. “
7. The correct approach, as the Supreme Court identified (at paragraph 236), was that “...each of these cases has called for a full and careful assessment of the justification for the orders sought, the rights which are or may be interfered with by the grant of the order, and the proportionality of that interference. Again, insofar as the applicant seeks an injunction against newcomers, the judge must be satisfied that there is a compelling need for the order. Often the circumstances of these cases vary significantly one from another in terms of the range and the number of people who may be affected by the making or refusal of the injunction sought; the legal right to be protected; the illegality to be prevented; and the right to the respondent's to the application. The duration and geographical scope of the injunction necessary to protect the applicant's rights in any particular case are ultimately matters for the judge having regard to the general principles we have explained.”
8. The Court further identified that such orders should be made subject to review, the purpose of which they identified (at paragraph 225) as being to “...give all parties an opportunity to make full and complete disclosure to the court, supported by appropriate evidence, as to how effective the order has been; whether any reasons or grounds for its discharge have emerged; whether there is any proper justification for its continuance; and whether and on what basis a further order ought to be made”.
9. Against that background, as was made clear for example by Sweeting J in the case of *Esso Petroleum Company Ltd & Anor v Persons Unknown & Ors* [2025] EWHC 1768 (KB) (at paragraph 5 – 8) the court's role now is not to revisit the merits of the case as if *de novo* but, rather, to assimilate each matter sufficiently to take an informed view

about whether the injunction has outlasted the compelling need which led to it being made in the first place in view of any change in circumstances. That, he said, was the best and most proportionate way of dealing with these matters, and he added:

"Such a review is also an opportunity to make necessary adjustments in the light of experience of the practical operation of the injunction and the changing circumstances."

The approach of Ritchie J.

10. In his *ex tempore* ruling, a note of which has helpfully been provided, Ritchie J identified factors necessary to be considered when granting an injunction against persons unknown, as follows:
11. First, "*the substance of the cause of action*": He identified that that included trespass and private and public nuisance, ownership of the roads, bylaws prohibiting protest and consent to enter only for travel purposes. He considered in this case the substance for the cause of action to be valid.
12. Second, "*full and frank disclosure*": He was satisfied the Claimant, through counsel, had provided such full and frank disclosure.
13. Third, "*whether there was sufficient evidence to prove the claim*": He considered the evidence that had been put before him to be more than sufficient to prove that there was a risk of tort being committed at Gatwick Airport, as had been committed elsewhere.
14. Fourth, "*whether there were realistic defences*": The learned Judge's approach last year was to observe in relation to private land that there was no real defence under the Human Rights Act 1998 based on protest because such protest could take place on public land. In relation to third-party land, he considered on balance that the scope of the injunction should cover small parcels of third-party land within the airport in order to provide proportionate necessary protection for the Claimant, protection of the land and for the businesses run within the areas of their own possession. He added that an impingement of the unknown persons' right to freedom of speech was relatively small

compared to the huge damage that might occur if a person unknown decided to run into Gatwick Airport and hide in a third-party store so that they were not to be covered by the terms of the injunction.

15. I pause in my review of the approach of Ritchie J in relation to that consideration of human rights to take notes of the decision in *Hallam & Ors v R* [2025] EWCA Crim 199. There the Lady Chief Justice (at paragraph 36) made clear that trespass does not remove the trespasser from the scope of articles 10 or 11 of the European Convention on Human Rights. However, she went on to make clear that such protest does significantly weaken the protection those rights afford. I am satisfied that decision does not undermine or alter the approach identified by Ritchie J to the question whether there were realistic defences here. In any event, as he found, the impingement of those rights in relation to an unknown person is relatively small compared to the damage that might be caused by such persons. The rights of the Claimant in this regard, and the rights of those legitimately using the airport, far outweigh any such impingement of the rights of the persons who may be affected by this injunction.
16. Returning to Ritchie J analysis, he then considered “*whether there was compelling justification for granting the ex parte and against persons unknown*”. He considered that this was made out, given the very high level of threat that he identified and to which I have already referred.
17. Next, he considered “*whether alternative remedies would be sufficient*”. He took account of the bylaws to which I have made reference, and the penalties that have been imposed under the criminal law in relation to persons who had protested at airports in the past. He was satisfied that damages were not an adequate remedy, and that the alternative remedy under the bylaws was insufficient.

Notice of this application

18. I turn to consider, then, the present application against that background. But before considering it in turn, I consider whether sufficient notice has been given of this application.

19. By reference to section 12, Human Rights Act 1998, where the court is considering whether to grant relief which might affect the exercise of the convention rights to freedom of expression and where persons who may be affected are not represented, I must be satisfied (i) that the applicant has taken all practical steps to notify the respondents, or (ii) that there are compelling reasons why the respondents should not have been notified.
20. In that regard, I have helpfully been provided with two statements from Graeme Robertson, a senior associate of the firm representing the Claimant. He explains in detail what steps have been taken to give notice of this hearing, including the uploading of the application for the continuance of the injunction and notice of the hearing to Gatwick's website, sending emails to a number of addresses that had been identified at the time of Ritchie J's order, together with further email addresses identified since, and the affixing of notices at relevant locations. He further confirms in his second statement the steps that have in fact been taken. Against that background, I am satisfied that proper notice has been given of this application, and that should anyone falling within its scope have wished to make representations, they have had the opportunity to do so. I should add that, in any event, Mr Morshead KC has properly directed my attention to matters that any such person would have been able to raise had they been here.

Events since the order was made.

21. The central question for the purpose of this review is whether this Court can be satisfied that the circumstances which justified the making of the order remain unchanged so that there remains a compelling need for the order to continue.
22. I have been provided with the chronology of events, the details of which are addressed in Mr Robertson's statements. There is, as is properly conceded, evidence in both directions as to changes of circumstance since the order was made. On the one hand, since the order was made there have been protests, or attempts at protests, leading to arrests at Heathrow, London City and Gatwick airports in July of 2024, and at Heathrow and Manchester airports in August. There was a demonstration at Inverness Airport in February 2025.

23. On the other hand, on 27 March 2025, Just Stop Oil made an announcement to the press to indicate that the group was withdrawing from organised protest. I have considered both whether this should have been drawn to the Court’s attention earlier, as indicating at an earlier stage that this order was no longer required, and whether that this announcement means that the order is no longer required now. It is right to observe, first, that the terms of Just Stop Oil's announcement are ambiguous. It includes, beyond saying that they are withdrawing from organised protest, references to continued resistance, adding that this is “not the end of civil resistance”. The note to editors at the bottom of their release says, in terms, that Just Stop Oil is “committed to non-violent direct action”.
24. There is rather more to the position than that announcement might have suggested beyond its terms.
25. GB News reported on 18 May 2025 that this announcement was not Just Stop Oil's settled position. It predicted a dramatic U-turn. On 21 May, far from denying this, Just Stop Oil commented in an email to its members "GB News was right for once. We are plotting a very big comeback". Their email also contains an invitation to donate for continued action.
26. On the same day, a police assessment as to the threat level was emailed to a number of police forces. It considered the level of risk of environmental protests at airports, considering that situation overall. It described the threat in the UK as having returned to dormant, but not withstanding that overall assessment, it did address a number of active groups. Importantly, that national police assessment was provided by the Metropolitan Police to, amongst others, London City Airport. It did so in the context of providing intelligence that a number of environmental protest groups planned to target the Shell Oil meeting within the area covered by the injunction at Heathrow that had relocated. That email from the Metropolitan Police observed that “...the injunction at Heathrow Airport had a real impact on the Shell protest [...], to remove an injunction now would open up to further protests, and whilst Just Stop Oil have stepped down, there appear to be a cycle of new groups emerging and this cannot be ruled out, so maintaining it would be very much recommended.”

27. Further, over the weekend of 14 and 15 June 2025, Just Stop Oil and Youth Demand, another protest organisation, arranged an event described as "Seeds of Rebellion" which, seemingly, was part of a training programme where attendees would be taught "all the theory and practice for pulling off the non-violent democratic revolution that is coming". In keeping with that, Just Stop Oil's fundraising page continues to invite donations for a "new campaign that is in the works".
28. The ambiguous nature of Just Stop Oil's announcement, and the strong reasons to approach it with circumspection, in my judgment, justified the delay in it having been brought to this Court's attention. It has been brought to this Court's attention now, and it has been considered by me.
29. I agree with the analysis of Sweeting J in the *Esso Petroleum* case (at paragraph 25) that "the principle factual development has been Just Stop Oil's announcement in March 2025 in relation to "hanging up the high-vis". However, as I have outlined above, the evidence shows, in my view, this announcement cannot be taken as an unequivocal and final renunciation of direct action. The amorphous nature of the group, combined with the past experience of similar unfulfilled statements by Extinction Rebellion and Just Stop Oil's subsequent communications and activities, mean that it would be premature to rely on this announcement as a basis for amending or discharging the injunction. The risk of direct action by those connected with Just Stop Oil's campaign remains real and imminent."
30. In my judgment, not only does there remain a clear and present risk from Just Stop Oil, not least given the clear difference between its message to the press and its communication to its members, but there remains such a risk from other similar protest organisations. Four other activist groups remain and continue to protest fossil fuels by the use of direct action. No single protest organisation speaks for all such activists. I have been shown and taken note of posts this year from organisations Shut System and Extinction Rebellion, in April and June of this year more particularly, which each refer to continued activism in this regard. Even a complete repudiation of disruptive protests by all such organisations would not exclude the risk of actions by individuals or other splinter groups.

31. Whilst, as has been properly identified to me, a number of the relevant groups have indicated a change of focus, for example to protests in relation to the prohibition of Palestine Action, that does not mean that such organisations, or members of such organisations, given the opportunity, would not continue their environmental activism. There has been no indication from any of these organisations, including Just Stop Oil, that they have abandoned the convictions that has underpinned their actions thus far.
32. I have, in this context, also been referred to the acquittal of a number of protestors in relation to action at Gatwick Airport. They were prosecuted for public order offences and acquitted for reasons set out in the article to which I was taken. In my judgment, that material does not undermine the need for the injunction that is sought here. Indeed, if anything, the fact that other aspects of the criminal law were not able to address trespassing behaviour perhaps underlines the importance of there being an injunction to prevent such activism.

The effectiveness of the order.

33. It is important in this review to consider whether the injunction has been effective in meeting the risk identified in 2024, the continued presence of which risk I have just addressed.
34. It is clear, on the evidence I have seen, that the injunction has been proved to have acted as an effective deterrent. By way of example, (i) two protests due to have occurred at London City Airport were relocated, social media indicating that that was because the protesters involved were aware of the injunction. (ii) It was a Metropolitan Police assessment, to which I have already referred, in relation to Heathrow Airport, that the injunction continued to have an important positive role. (iii) There has been a dramatic reduction in the number of actual or attempted protests since the injunction was made. That, on the evidence I have seen, is not because the threat has gone but because the injunction is managing that threat.
35. That leads me to a further important consideration, alluded to by the Metropolitan Police email in relation to Heathrow Airport. That is that the removal of the injunction would risk making airports such as Gatwick a greater target in the future. That risk

would be all the greater because a number of injunctions have already been granted in relation to a number of other airports. Were Gatwick Airport not to receive the protection of such an injunction, it would be exposed as a greater target. As Linden J put it in the *Esso Petroleum Company Ltd v Person Unknown & Ors* [2023] EWHC 1837 (at paragraph 67), in the context of disruption of oil infrastructure in 2021/2022:

"It appears that the effect of the various injunctions which have been granted... has been to prevent or deter them from taking the steps prohibited by the order of the court, although of course not invariably so. If, therefore, an injunction is refused in the present case, the overwhelming likelihood is that protests of the sort which were seen in 2021 and 2022 will resume."

36. That remains, in my judgment, an astute observation. As Mr Morshead KC submitted, the protest organisations that are of concern are not unsophisticated in their operation. They will recognise the opportunity to protest where an injunction does not prevent them from doing so.

Conclusions.

37. I am satisfied that there remains a compelling need for the injunction made in July 2024, one year on. I reach that conclusion having undertaken the full and careful assessment required. Whilst it is not my task to consider the merits of the order as originally made, in considering whether the order remains necessary I have taken full account of the careful analysis of Ritchie J to which I have referred. That analysis holds good now as it did then.
38. There has not, in my view, been any change of circumstances that means that the order has outlasted the compelling need. On the contrary, I am satisfied that it is the continuation of the order that has addressed, and must continue to address, the risks that have been identified. The order can in the future be reviewed if that picture changes, and will in any event be reviewed in 12 months' time. I am fortified in the view that I have reached, although I stress I have reached my own conclusions, by the fact that

similar injunctions have recently been reviewed and continued by Bourne J in relation to 10 other airports on 24 June of this year.

39. As was recognised by Sweeting J in *Esso Petroleum* Case, it is permissible to make adjustment to the terms of an order in the light of experience of its practical operation. I should, in that regard, address two matters to which my attention has been drawn. That is to the approach of Nicklin J in the decision of *MBR Acres Ltd & Ors v Curtin* [2025] EWHC 331 (KB). First, he identified that "persons unknown" was a sufficient description for defendants in relation to an injunction such as this. In my judgment, by reference to the observations of the Supreme Court in the *Wolverhampton* case (at paragraph 221), it is important that persons unknown are identified, insofar as is possible, so that it is clear whether a person is or is not affected by the injunction. A more detailed description here, is, in my judgment, appropriate, and I take note both of the approach, and the reasons for it, of Sweeting J in the *Esso Petroleum* case in this regard, at paragraph 28 of that judgment.
40. Secondly, Nicklin J required that the claimant should be required to obtain the court's permission before applying to commit any person in protest cases. That approach may well have been appropriate on the facts of the case with which Nicklin J was dealing. Such an approach here, in my judgment, would fail to give proper effect to what was described in the *Wolverhampton* case (at paragraph 152) as equity's essential flexibility.
41. On the facts of this matter, in my judgment, it would be disproportionate to require the Claimant to refer any person to this court effectively twice for permission, first, before committing them, and then when they were committing them. Such double referral is not necessary, in my judgment, to safeguard the rights of any such defendant. In any event, there is no evidence that I have seen of a disproportionate application of this order by this claimant hitherto. Indeed, if anything, their approach hitherto has been a cautious one. Accordingly, therefore, subject to any amendment that is now sought as to the precise terms of this order, I direct that it should continue for a further period of 12 months.

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Lower Ground, 46 Chancery Lane, London WC2A 1JE

Email: civil@epiqglobal.co.uk

This transcript has been approved by the Judge

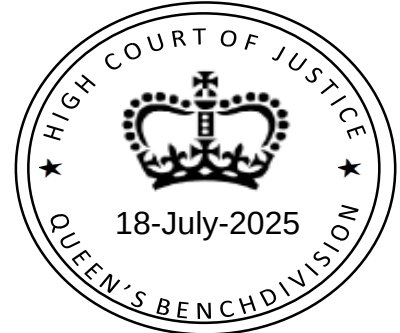
IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

Claim No: KB-2024-002336

BEFORE: MR DUNCAN ATKINSON KC (SITTING AS A DEPUTY JUDGE IN THE HIGH COURT)

DATED: 18 JULY 2025

B E T W E E N:



KB-2024 002336

GATWICK AIRPORT LIMITED

Claimant

-and-

PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LONDON GATWICK AIRPORT SHOWN OUTLINED IN YELLOW AND SHADED YELLOW ON PLAN 1 ATTACHED TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendant

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, 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 OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE 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 certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to

vary or discharge this Order (which is explained below).

UPON the injunction made by Order dated 19 July 2024 by Mr Justice Ritchie (the “**Injunction Order**”)

AND UPON the Claimant's application dated 4 July 2025 (the “**Review Application**”)

AND UPON reading the Review Application and the Witness Statements of Graeme James Robertson dated 4 July 2025 and 16 July 2025

AND UPON hearing Mr Morshead KC and Miss Barden for the Claimant and no one attending for the Defendant

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Injunction Order

IT IS ORDERED THAT

1. The Injunction Order shall remain in full force and effect, subject to the amendments thereto set out in the schedule to this Order (subject to review, as provided for in paragraph 3 of the Injunction Order).
2. The Court will provide sealed copies of this Order to the Claimant's solicitors for service by the steps set out in paragraph 4 of the Injunction Order.

SCHEDULE

Claim No: KB-2024-002336

IN THE HIGH COURT OF JUSTICE

KINGS BENCH DIVISION

ROYAL COURTS OF JUSTICE

B E T W E E N:-

GATWICK AIRPORT LIMITED

Claimant

-and-

**PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES
PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT
WHO ENTER OR REMAIN ON THE PREMISES AT LONDON
GATWICK AIRPORT SHOWN OUTLINED IN YELLOW AND
SHADED YELLOW ON PLAN 1 ATTACHED TO THE CLAIM FORM
(WHETHER IN CONNECTION WITH THE JUST STOP OIL
CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR
OTHERWISE)**

Defendants

ORDER

PENAL NOTICE

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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 OR ANY OF THEM TO
BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE 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 certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

Before The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 19 July 2024

UPON the Claimant's claim by the Claim Form dated 18 July 2024

AND UPON the Claimant's application for an injunction dated 18 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statement of Neil Harvey dated 18 July 2024 and the witness statements of Julian Pollock dated 18 July 2024, (and another) 18 July 2024 and dated 19 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimant and no one attending for the Defendant

AND UPON the Claimant giving and the Court accepting the undertakings set out in Schedule 4 to this Order

AND UPON the Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London Gatwick Airport, as defined by this Order, should be made by email to legal@gatwickairport.com.

DEFINITIONS

"**London Gatwick Airport**" means the land shown outlined in yellow and shaded yellow on Plan 1 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 1**")

"**Warning Notice**" means a notice in the form as set out in Schedule 5 to this Order

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Defendants are forbidden from entering, occupying or remaining on any part of London Gatwick Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Claimant.
2. For the avoidance of doubt, the Order does not apply to:
 - a. The highways shown in pink and yellow on Plan 2 in Schedule 2 to this Order,

- b. The National Rail railway station at London Gatwick Airport, located at the South Terminal and the precincts thereto up to the concourse at the South Terminal.
3. This Order is subject to periodic review by the Court on application by the Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

4. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the Defendants:
 - a. Uploading a copy onto the following website:
<http://www.gatwickairport.com/injunction.html>
 - b. Sending an email with this Order attached to the email addresses listed in Schedule 3 stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
 - c. Affixing notices at regular intervals around the perimeter fence and at suitable entrances/exits to London Gatwick Airport where these documents can be found and obtained in hard copy in the form of Schedule 5.
5. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.
6. The taking of such steps set out at paragraph 4 shall be good and sufficient service of this Order and of the Claim Documents upon the Defendants.
7. The Court will provide sealed copies of this Order to the Claimant's solicitors for service (whose details are set out below).
8. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 4. The step described at paragraph 4(c) will be completed when those notices are first affixed.
9. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 4. The step described at paragraph 4(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

10. Service on the Defendants of any further applications or documents in the proceedings by the Claimants shall be effected by carrying out each of the steps in paragraph 4.

11. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application by email to injunctions@hsfkramer.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Claimant's solicitors at least 48 hours in advance of any hearing.
12. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.
13. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimant's solicitors.
14. The Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
15. No acknowledgment of service, admission or defence is required by any party until further so ordered.
16. The Claimant shall notify its tenants and/or licensees who have interests and/or rights in London Gatwick Airport of the making of this Order in writing and/or by providing copies of this Order to them.
17. Costs are reserved.

Ritchie J

Made 19.7.2024

COMMUNICATIONS WITH THE CLAIMANT

The Claimant's solicitors and their contact details are:

Herbert Smith Freehills Kramer LLP

Exchange House

Primrose Street

London EC2A 2EG

Attn: Graeme Robertson / Leon Culot

E: injunctions@hsfkramer.com

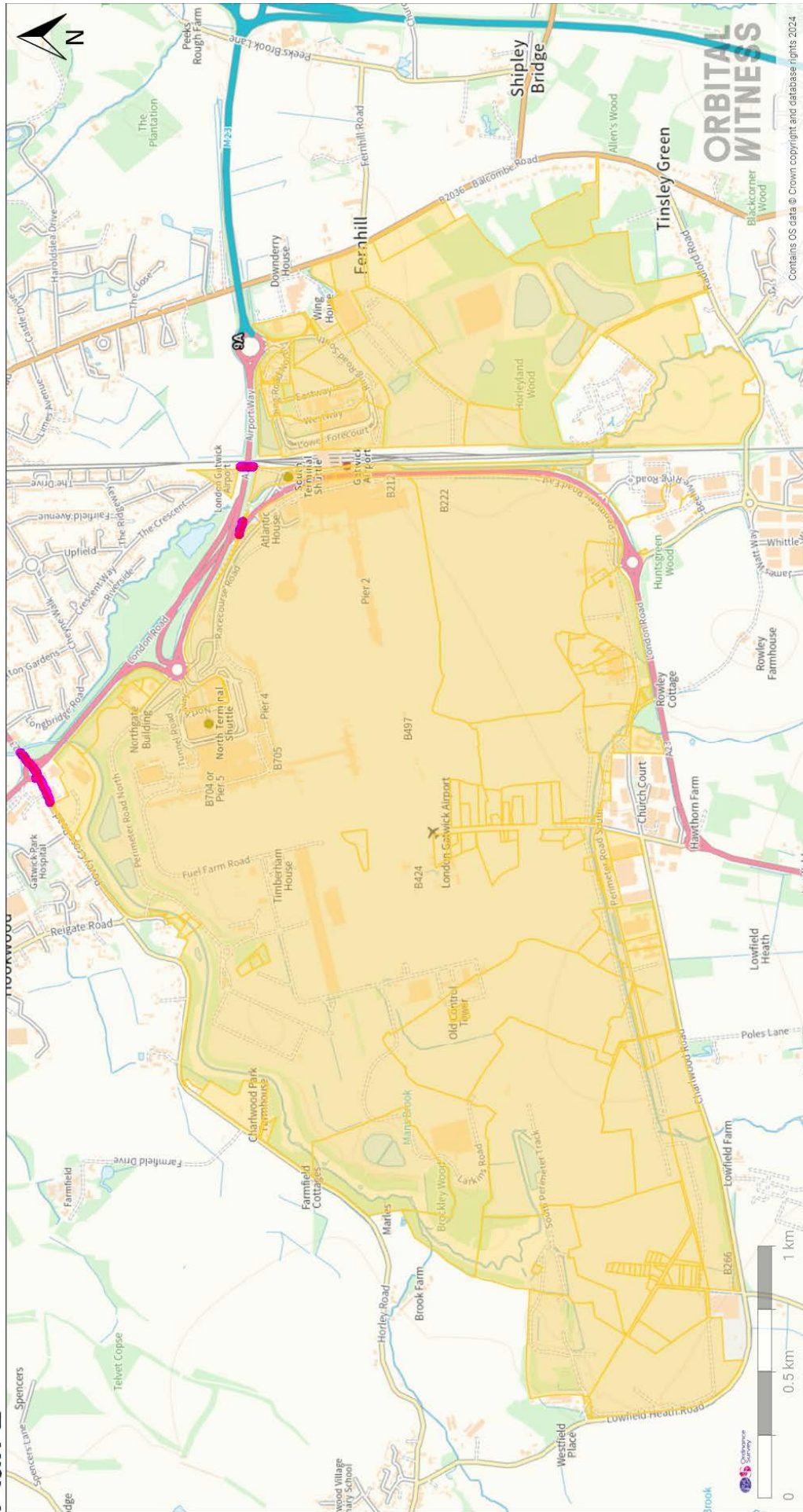
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Communications with the Court

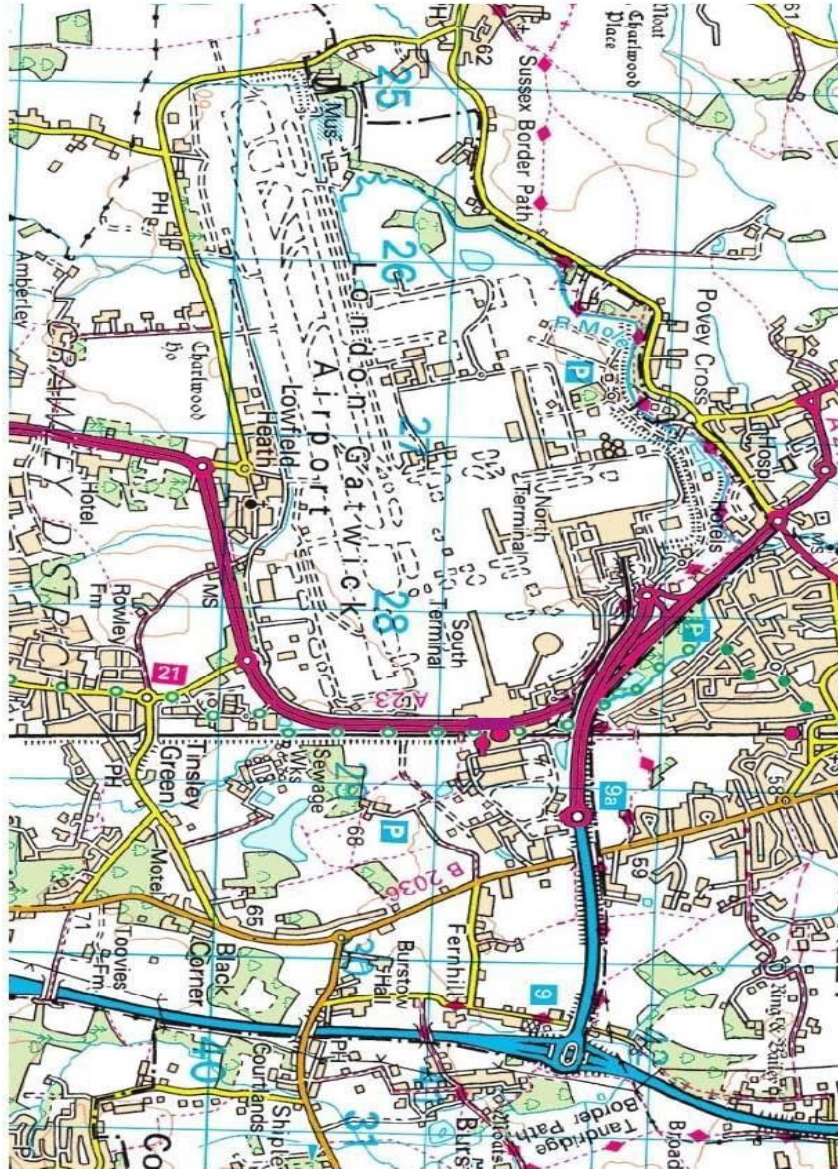
All communications to the Court about this Order should be sent to: King's Bench Division, Royal Courts of Justice, Strand, London WC2A 2LL. The offices are open between 10.00am and 4.30pm Monday to Friday except bank holidays. The telephone number is 020 7947 6000.

SCHEDULE 1

Plan 1



SCHEDULE 2



SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.uk

SCHEDULE 4 - UNDERTAKINGS GIVEN BY THE CLAIMANT

- (1) The Claimant will take steps to serve the Defendant with a note of the hearing which took place on 19 July 2024 by 2 August 2024.
- (2) The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

HIGH COURT CLAIM NO: KB-2024-002336

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 19/7/2024

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LONDON GATWICK AIRPORT SHOWN OUTLINED IN YELLOW AND SHADED YELLOW ON PLAN 1 ATTACHED TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Gatwick Airport Limited ("**the Claimant**")

This notice relates to the land known as London Gatwick Airport, Gatwick RH6 ONP which is shown outlined in yellow and shaded yellow on the Plan below (the "**Airport**")

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Claimant
2. You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any 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 by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

Copies of the following documents may be viewed at: 5th Floor, Destinations Place, Gatwick Airport, Gatwick, West Sussex, RH6 0NP or online at <http://www.gatwickairport.com/injunction.html>:

- Order of Ritchie J dated 19/7/24, copies of the Claim Documents which relate to the Order and a note of the hearing on 19/7/24; and
- Order of Mr Duncan Atkinson KC (sitting as a Deputy Judge in the High Court) dated 18/7/25 (affirming the Order of Ritchie J dated 19/7/24), copies of the Application Documents which relate to the review application and a note of the hearing on 18/7/25.

Copies may also be obtained from the Information Desk or by contacting Herbert Smith Freehills Kramer LLP at Exchange House, Primrose Street, London EC2A 2EG, on 0207 466 2793 or by email at injunctions@hsfkramer.com.

IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KINGS BENCH DIVISION

Before: The Honourable Mr Justice Turner

On: 23 July 2025

B E T W E E N:

HEATHROW AIRPORT LIMITED

-and-



(1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM

(2) – (26) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND BY THE ORDER OF MR JUSTICE RITCHIE DATED 14 FEBRUARY 2025, AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS OF CLAIM

Defendants

ORDER

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 OR PERSONS UNKNOWN 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 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 Injunction made by the Order dated 9 July 2024 of Mr Justice Julian Knowles (“**the Injunction**”)

AND UPON the Orders dated 11 December 2024 of Mr Justice Dexter Dias (“**the Dias J Order**”) and dated 14 February 2025 of Mr Justice Ritchie (“**the Ritchie J Order**”) joining the 2nd to 26th Defendants as named Defendants to these proceedings

AND UPON the review hearing which took place on 23 July 2025 (as listed pursuant to paragraph 3 of the Injunction)

AND UPON READING the witness evidence filed by the Claimant in support of the continuation of the Injunction, in the form of: (i) the First Witness Statement of Philip Keith Spencer; and (ii) the First Witness Statement of Tonia Fielding, both dated 7 July 2025

AND UPON HEARING Mr Tom Roscoe, Counsel for the Claimant and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted in the Injunction (as extended to apply to the 2nd – 26th Defendants by the Dias J Order and the Ritchie J Order)

IT IS ORDERED THAT:

1. The Injunction shall remain in full force and effect, subject to the variations thereto set out in the schedule to this Order to reflect the effect of the Dias J Order and the Ritchie J Order (and subject to review, as provided for in paragraph 3 of the Injunction).
2. The Court will provide sealed copies of this order to the Claimant’s solicitors for service or notification in accordance with paragraphs 9 and 14 of the Injunction (as varied in the schedule hereto).

Dated: 23 July 2025

Service:

The Court provided sealed copies of this order to the serving party:

Bryan Cave Leighton Paisner
Governor's House
5 Laurence Pountney Hill
London
EC4R 0BR

akhil.markanday@bclplaw.com

phil.spencer@bclplaw.com

Solicitors for the Claimant

VARIED PURSUANT TO THE ORDER OF MR JUSTICE TURNER DATED 23 JULY 2025

IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KINGS BENCH DIVISION

Before The Honourable Mr Justice Julian Knowles

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

-and-

(1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM

(2) – (26) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND BY THE ORDER OF MR JUSTICE RITCHIE DATED 14 FEBRUARY 2025, AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS OF CLAIM

Defendants

VARIED ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR 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 OR PERSONS UNKNOWN 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 AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it 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 having issued this Claim by a Claim Form dated 7 July 2024

AND UPON hearing the Claimant's application for an interim injunction by Application Notice dated 7 July 2024

AND UPON READING the Witness Statements of Akhil Markanday dated 6 July 2024 and Jonathan Daniel Coen dated 7 July 2024

AND UPON HEARING Leading Counsel and Junior Counsel for the Claimant

AND UPON the Claimant giving and the Court accepting the undertakings set out in Schedule 1 to this Order

AND UPON the Orders dated 11 December 2024 of Mr Justice Dexter Dias ("the Dias J Order") and dated 14 February 2025 of Mr Justice Ritchie ("the Ritchie J Order") joining the 2nd to 26th Defendants as named defendants to these proceedings

AND UPON the first annual review of this Order having taking place on 23 July 2025 in accordance with paragraph 3 herein.

IT IS ORDERED THAT:

INJUNCTION

1. Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 ("Plan A").
2. In respect of paragraph 1, the Defendants must not (a) do it himself/herself/themselves in any other way (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
3. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the

Court's list) with a time estimate of 1 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing.

VARIATION

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.
5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimant has liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

7. Service of the Claim Form, the Application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024 will be notified to the **First Defendants** by the Claimant carrying out each of the following steps:
 - 8.1 Uploading a copy on to the following website: www.heathrow.com/injunction
 - 8.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made and that the documents can be found at the website referred to above.
 - 8.3 Either affixing a notice at the locations shown marked with a red dot on the second plan attached to this Order at Schedule 4 ("Plan B") setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9.4 below.

9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to the **First Defendants** by the Claimant carrying out each of the following steps:
 - 9.1 Uploading a copy of the Order on to the following website:
www.heathrow.com/injunction
 - 9.2 Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
 - 9.3 Affixing a copy of the Order in A4 size in a clear plastic envelope at each of the locations shown with a red dot on Plan B.
 - 9.4 Affixing warning notices of A2 size at those locations marked with a red dot on Plan B, substantially in the form of the notice at Schedule 5.
10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to the **First Defendants** of any further applications shall be effected by the Claimant carrying out each of the following steps:
 - 10.1 Uploading a copy of the application on to the following website:
www.heathrow.com/injunction
 - 10.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
 - 10.3 Affixing a notice at these locations marked with a red dot on Plan B stating that the application has been made and where it can be accessed in hard copy and online.
11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to the **First Defendants** may be effected by carrying out the steps set out in paragraphs 10.1 and 10.2 only.
12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8.3, 9.3 and 10.3, effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.
14. Pursuant to CPR r.6.15 and 6.27, it is directed that service of this Order and any further document(s) to be served in these proceedings shall be effected on Defendants 2 – 26 as follows:
 - 14.1 by first class post to the addresses listed in the Re-Amended Particulars of Claim dated 18 February 2025;
 - 14.2 in respect of any such Defendant who the Claimant has reasonable cause to believe (after due enquiry) is in prison (whether on remand or otherwise), the Claimant shall (in addition) seek to establish the prison that they are in (via the Government's 'find a prisoner' service or otherwise) and effect service by first class post to that prison;
 - 14.3 in either case, by email to juststopoil@protonmail.com; juststopoilpress@protonmail.com; and info@juststopoil.org; and
 - 14.4 by posting copies on to the following website: www.heathrow.com/injunction.
15. Copies of the documents emailed or posted in accordance with paragraphs 14.3 and 14.4 above shall be redacted to remove the addresses of the Defendants.
16. The steps taken pursuant to paragraph 14 above shall be verified by a certificate of service and/or witness statement, and deemed service shall occur (in respect of each such Defendant) seven working days after the taking of the last relevant step in respect of such Defendant.
17. In the event that any of Defendants 2 – 26 provides in writing to the Claimant's solicitors (whose details are set out below) a postal or an email address for service, service of all documents shall be by first class post or email to such address (as appropriate) and the ordinary provisions as to in the Civil Procedure Rules (including as to the deemed date) shall apply.

FURTHER DIRECTIONS

18. Liberty to apply.

COSTS

19. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

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

- (1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

- (2) Phil Spencer

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

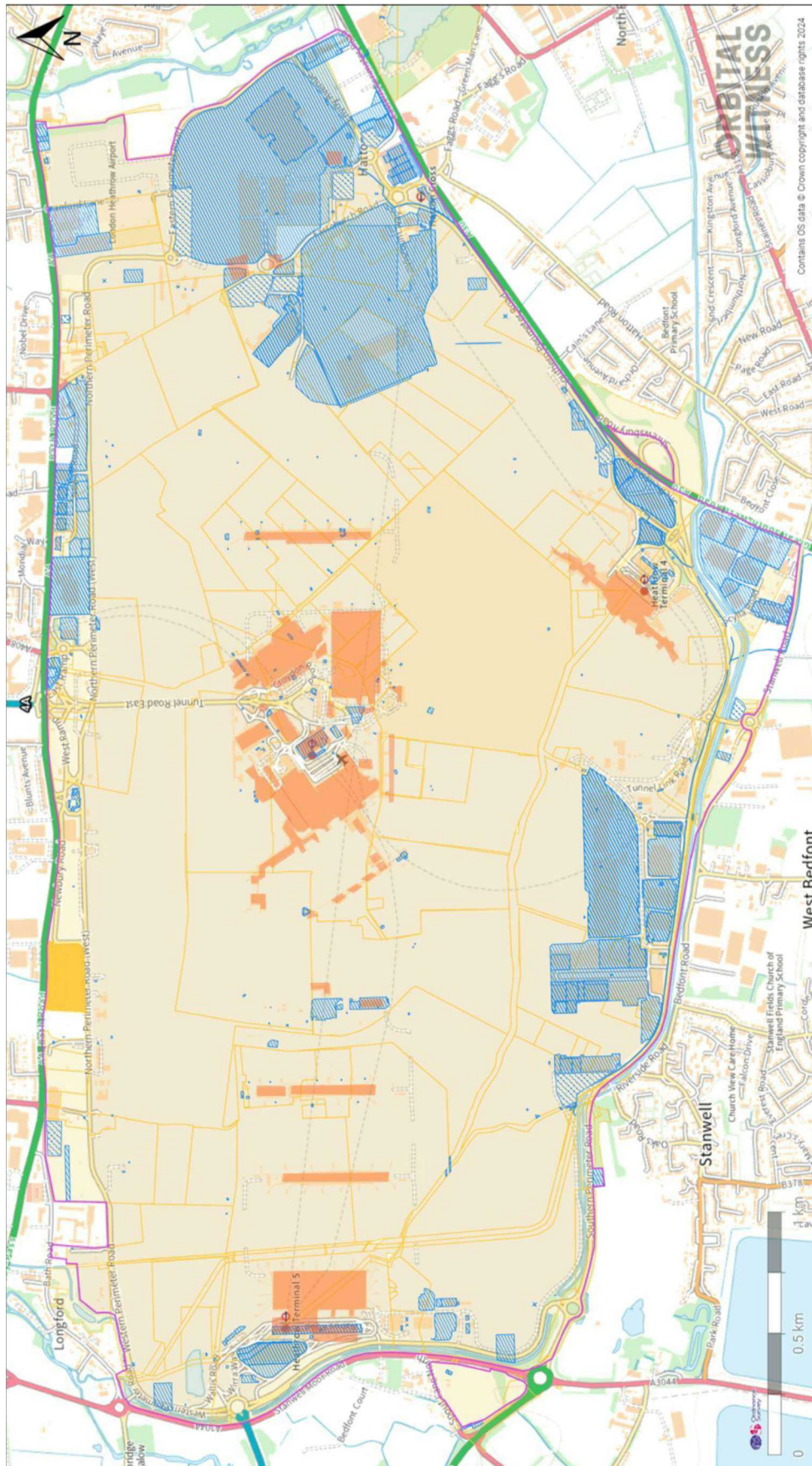
Dated: 9 July 2024

Varied: 23 July 2025

SCHEDULE 1 – UNDERTAKINGS

1. The Claimant will take steps to notify Defendants of the Claim Form, Application Notice, evidence in support, the Order and a Note of the Hearing on 9 July 2024 as soon as practicable and no later than 5pm on 15 July 2024.
2. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

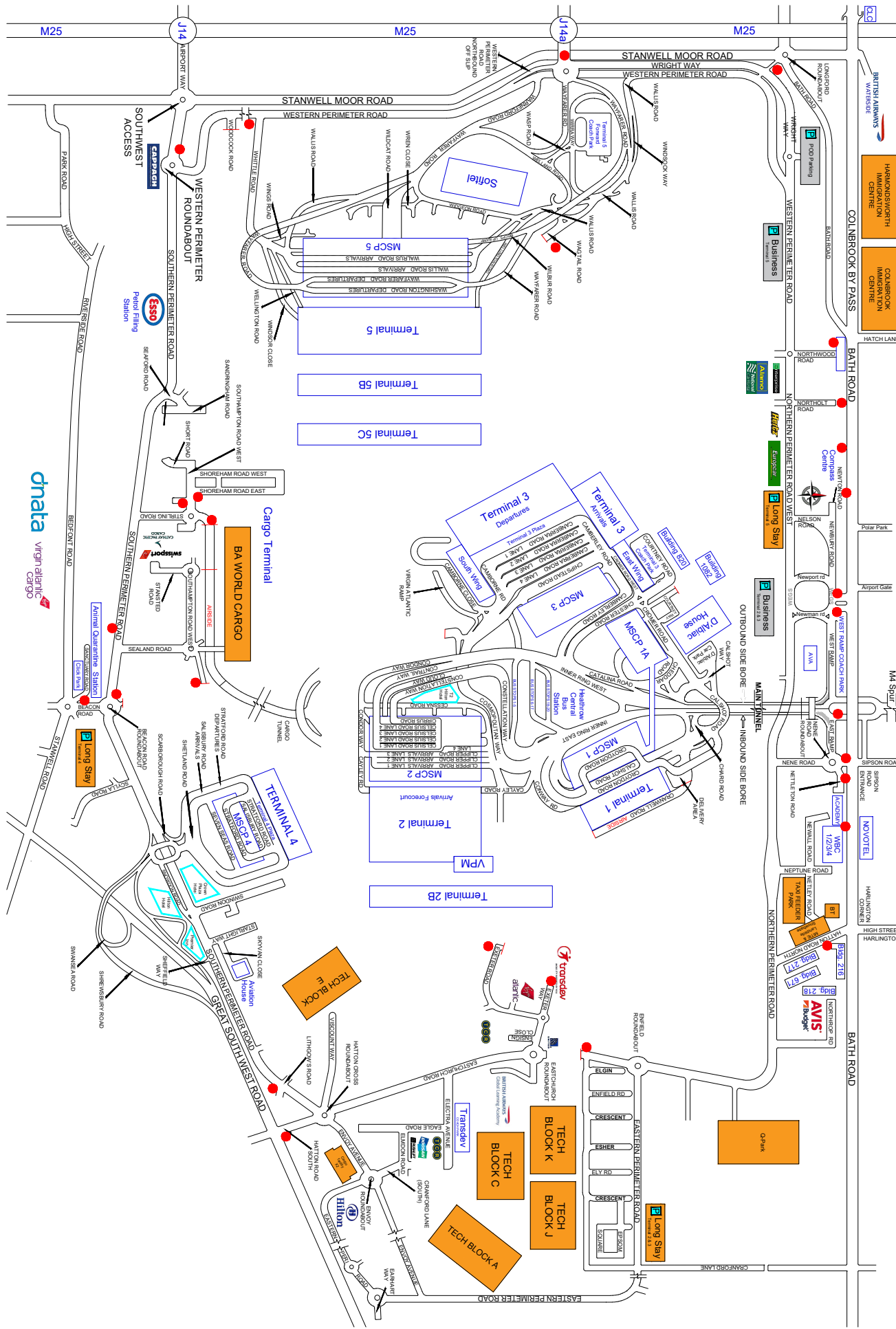
SCHEDULE 2 – PLAN A



SCHEDULE 3 – EMAIL ADDRESSES

1. juststopoil@protonmail.com
2. juststopoilpress@protonmail.com
3. info@juststopoil.org

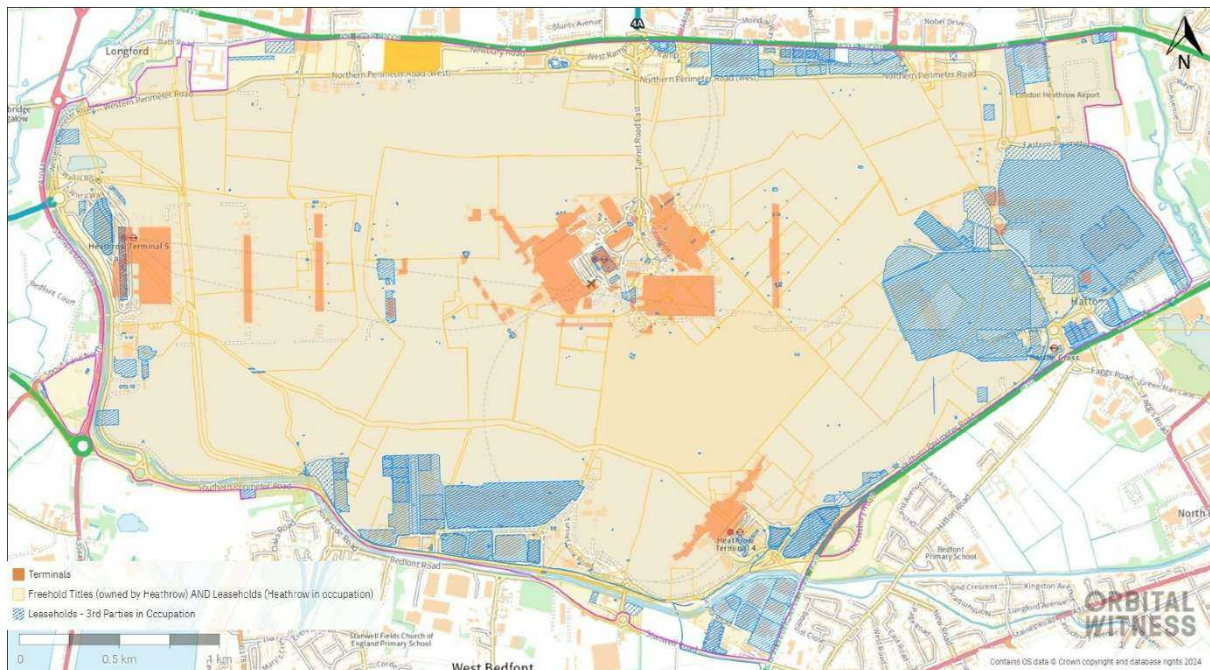
SCHEDULE 4 – PLAN B



SCHEDULE 5 – NOTICE
WARNING – NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted in Claim No KB-2024-002210 granted on 9 July 2024 until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, now exists in relation to Heathrow Airport. The injunction means you may NOT without the express consent of HEATHROW AIRPORT LIMITED:

IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN ENTER, OCCUPY OR REMAIN UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE PLAN BELOW:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED, OR HAVE THEIR ASSETS SEIZED.

A copy of the legal proceedings (including the Order, Claim Form, Application Notice, evidence in support and a note of the hearing on 9 July 2024) can be viewed at www.heathrow.com/injunction or obtained from:

- (1) Compass Centre, Heathrow Airport, Nelson Road, Hounslow TW6 2GW, which is open between 9am-5pm Monday-Friday; or
- (2) Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR (Reference: AMRK/PSPE/20H0904.000140; Telephone: 020 3400 3119).

Anyone notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. The address of the Court is the Royal Courts of Justice, Strand, London WC2A 2LL.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Birmingham Civil and Family Justice Centre
The Priory Courts, 33 Bull Street
Birmingham B4 6DS

Date: 23 September 2025

Before:

HHJ Emma Kelly sitting as a Judge of the High Court

Between :

**NORTH WARWICKSHIRE BOROUGH
COUNCIL**

Claimant

- and -

**THE DEFENDANTS LISTED AT SCHEDULE A
TO THIS JUDGMENT**

Defendants

Mr Jonathan Manning (instructed by **North Warwickshire Borough Council, Legal Services**) for the **Claimant**.

The **Defendants** did not attend and were not represented.

Hearing date: 18 September 2025.

Judgment handed down remotely at 10am on 23 September 2025 by circulation to the parties or their representatives by email and by release to the National Archives.

APPROVED JUDGMENT

HHJ Emma Kelly:

Introduction

1. This is the first annual review of an injunction granted in this matter to North Warwickshire Borough Council (“the Council”). The Council seek continuation of the existing order and power of arrest.
2. The Defendants are a combination of ‘Persons Unknown’ and named individuals connected with protest activity at an inland oil terminal known as Kingsbury Oil Terminal (“the Terminal”) in Kingsbury, Warwickshire. None of the Defendants attended or were represented at the review hearing.

Background

3. The claim arose from protest activity that occurred in 2022 inside the perimeter and in the locality of the Terminal. The factual and procedural background to the claim is set out at [3]–[13] and [18]–[43] of the judgment that followed the trial: *North Warwickshire Borough Council v Barber & Others* [2024] EWHC 2254 (KB) (‘*NWBC*’).
4. On 6 September 2024, I granted a ‘final’ order, prohibiting protests within the boundary of the Terminal and restricting certain protest activity within the locality of the Terminal (‘the Injunction’). A power of arrest was attached to the Injunction, pursuant to s.27 of the Police and Justice Act 2006. The Injunction was to remain effective until 16:00 on 6 September 2027, subject to annual reviews. The hearing on 18 September 2025 was the first such review.

Service

5. Paragraph 11 of the Injunction granted permission to the Council to serve the Injunction and power of arrest by alternative means. The service requirements fell into one of three categories. Those Defendants (all named individuals) identified in paragraph 11(a) could be served by recorded first class post. Those Defendants (again all named individuals) identified in paragraph 11(b) could be served by email. Those Defendants (some named individuals and some categories of persons unknown) identified in paragraph 11(c) could be served by various alternative methods specified in Schedule 3 to the Injunction. The Claimant was required to complete all of the steps identified in paragraph 1(a)–(h) of Schedule 3 to effect service on the paragraph 11(c) category of Defendants.
6. Paragraph 5 of the Injunction provided the time, date and location of the review hearing. Therefore, even if a Defendant had not been present in court when the Injunction was made on 6 September 2024, they would have been provided with notice of the review hearing on being served with the Injunction.
7. The Council has filed a number of certificates of service in respect of the Injunction and power of arrest. The paragraph 11(a) Defendants were deemed

served on 18 September 2024. The paragraph 11(b) Defendants were deemed served on 16 September 2024.

8. In respect of service on the paragraph 11(c) Defendants, the Council relies on two certificates of service. The first is said to relate to the requirements of paragraph 1(b) – (h) of Schedule 3, and gives a deemed date of service of 26 September 2024. The second certificate relates to the erection of 17 A1 sized signs around the boundary perimeter of the Terminal, required by paragraph 1(a) of Schedule 3, and gives a deemed date of service of 21 December 2024. Mr Manning explained it had taken some time for the signage to be manufactured.
9. During the hearing, I queried whether the Council had complied with paragraph 1(b) of Schedule 3, namely the requirement to place a copy of the Injunction and power of arrest prominently at the entrances to the Terminal. That step did not appear to be referred to in either of the relevant certificates of service. After taking instructions, Mr Manning confirmed that the Council had not placed separate copies of the Injunction and power of arrest at the entrances. The Council's rationale was that the A1 sized signage required by paragraph 1(a) of Schedule 3 provided information about the Injunction and power of arrest, and a QR code link to the documents, and such signage was placed prominently at the entrances. Mr Manning asked the Court to approve the alternative service steps taken to date as amounting to good service of the Injunction and power of arrest on the paragraph 11(c) Defendants. I indicated during the hearing that I was prepared to accede to that submission in circumstances where the aim of publicising the detail of the Injunction and power of arrest in prominent positions at the entrances to the Terminal had still been achieved, albeit via the A1 signage. I do however make it clear that the Court expects a party with the benefit of an alternative service provision to abide by all requirements directed by the Court. It is not appropriate for such a party to take a unilateral decision as to which steps to comply with, rather than making a formal application to vary the terms of alternative service.
10. Paragraph 6 of the Injunction required the Council to file and serve any updating evidence 21 days prior to the review hearing. The Council's updating evidence is contained in the 5th witness statement of Mr Steven Maxey, the Council's Chief Executive, dated 27 August 2025. The Injunction made no provision as to how the updating evidence should be served. It did not need to as paragraph 7 of an earlier order of Soole J, dated 6 December 2023, granted the Council permission to serve any document filed in the proceedings by the methods specified in paragraphs 7(i) to (iii) of that order. As with service of the Injunction, the Defendants were categorised into three groups. The first to be served by recorded first class post, the second by email and the third (which includes the persons unknown Defendants) by a variety of alternative service methods. The paragraph 7(i) Defendants were served by first class post on 30 August 2025. The paragraph 7(ii) Defendants were deemed served by email on 11 September 2025. The paragraph 7(iii) Defendants were deemed served by various alternative means on 28 August 2025.

11. In light of the aforementioned, I am satisfied that the Defendants have been served with the Injunction and power of arrest, and updating evidence, and were thus alive of the review hearing.

Legal Framework

12. The importance of a review hearing, particularly in cases involving persons unknown, was emphasised by the Supreme Court in *Wolverhampton City Council & others v London Gypsies and Travellers & others* [2023] UKSC 47 (“*Wolverhampton*”). At [225] the review hearing:

“...will give all parties an opportunity to make full and complete disclosure to the court, supported by appropriate evidence, as to how effective the order has been; whether any reasons or grounds for its discharge have emerged; whether there is any proper justification for its continuance; and whether and on what basis a further order ought to be made.”

13. A review hearing is not an opportunity to revisit the original merits of the claim afresh. The proper focus of the review is to consider whether anything material has changed since the injunction and power of arrest were granted. Material changes may be factual and/or developments in the law since the order was granted. If there has been a material change or changes, the Court needs to question whether the scope of the injunction needs amending or indeed whether there remains a compelling need for any kind of injunction or power or arrest at all. Such an approach is consistent with the views expressed in a number of post-*Wolverhampton* cases including by Ritchie J in *HS2 v Persons Unknown* [2024] EWHC 1277 (KB) at [32]-[33], Hill J in *Valero v Persons Unknown* [2025] EWHC 207 (KB) (“*Valero*”) at [20]-[23], and Sweeting J in *Esso Petroleum Company v Persons Unknown* [2025] EWHC 1768 (KB) (“*Esso*”) at [5]-[8].

The evidence

14. The Council relies on the updating evidence in Mr Maxey’s 5th witness statement. Mr Maxey has undertaken an internal review of the current need for an injunction and power of arrest, and remains of the view that they are necessary. His reasoning is as follows.
15. First, Mr Maxey states that Just Stop Oil and Extinction Rebellion, the main protest groups with which known Defendants to the claim are affiliated, remain active. He points to the current homepage of Just Stop Oil’s website which reads “JUST GETTING STARTED” and boasts that civil resistance is how Just Stop Oil “won no new oil and gas licences in 2024.” The website continues “We know how to win, but it’s going to take all of us” and “A new revolutionary direct action campaign is coming. Help us build what’s next.”
16. Second, Mr Maxey states that the Council is still being notified of planned direct-action by other, unaffiliated climate action groups. He states that as recently as July 2025, the police informed the Council of information suggesting direct-

action protests were being planned by environmentalists that summer. He expresses concern that the covert nature of operation of such groups makes it impossible for the Council or police to engage with those in charge of organising such protests to ascertain whether the Terminal is a target and, if so, to discuss how any protest can be conducted safely.

17. Third, Mr Maxey notes that the nature of risks posed by direct action or civil disobedience at the Terminal has not changed. The Terminal continues to operate and hold large volumes of exceptionally flammable products for distribution across the country.
18. Mr Maxey acknowledges that there have not been any further protests since the Injunction was granted but takes the view that the deterrent effect of the Injunction has been instrumental ensuring good order.
19. Mr Maxey gave short oral evidence at the review hearing to update matters since the signing of his 5th statement. He addressed two matters:
 - i) He had attended a meeting of the Strategic Coordinating Group of the Warwickshire Local Resilience Forum the day before the review hearing. At that meeting, the police indicated that they still regard the Injunction and power of arrest as operationally essential and being the mechanism by which order had been restored to the site.
 - ii) On his recent review of Just Stop Oil's website, he noticed a change of emphasis in the direction of their campaign. Whereas previously their stated aim was to stop the granting of new licences to extract oil or gas, he understood that their focus was now on stopping the extraction and burning of oil and gas by 2030. He considered the Terminal's role in the supply chain for oil and gas fuels could continue to make it a potential protest location in connection with the new phase of Just Stop Oil's campaign.

Discussion

20. I consider first whether there has been any material factual change(s) which calls into question the need or required scope of the Injunction.
21. The fact that there has not been any further protest activity at the Terminal since the Injunction was granted does not, of itself, provide evidence that the risk has abated. It is more likely that the Injunction and power of arrest have a deterrent effect. The logic of such an approach was endorsed by Hill J in *Valero* at [34]. The rationale of that conclusion is particularly pertinent in the index claim given the reduction in activity following the granting of the without notice interim injunction and, since September 2022, the cessation of protest activity. By the time of cessation of activity, contempt proceedings had resulted in the imprisonment of a number of protestors.
22. I do not take the view that there has been any material factual change that makes it appropriate to discharge the Injunction or power of arrest. I am satisfied that

there remains a continued real and imminent risk of direct action. The well-publicised statement by Just Stop Oil in March 2025 that it was “hanging up the hi vis” was considered in July 2025 by Sweeting J in *Esso* at [25]. He concluded that the “announcement cannot be taken as an unequivocal and final renunciation of direct action.” The Council has provided evidence of the current wording on Just Stop Oil’s website. The references to “just getting started”, civil resistance and a “new revolutionary direct action campaign” very much suggest that Just Stop Oil do indeed have further direct action planned. I further accept Mr Maxey’s evidence that the Council received police intelligence as to protest activity by other environmentalists, unaffiliated to Just Stop Oil, as recently as July 2025.

23. If individuals are minded to take direct action or other protest activity, the Terminal remains a prominent target. The evidence before the Court is that the Terminal continues to operate as it did when the Injunction was granted. The Terminal remains a prominent cog in the supply chain of oil and gas products for consumption. As described in *NWBC* at [18]-[21], the Terminal is one of the largest oil terminals in the country, holding and transporting millions of litres of highly flammable fossil fuels. The potential consequences of fire or explosion at or in the locality of the Terminal remain extremely grave.
24. I have considered whether there has been any material change in the law since the Injunction was granted. Mr Manning properly drew the Court’s attention to three potential matters of law or procedure that arose from the decision of Nicklin J in *MBR Acres Ltd & others v Curtin* [2025] EWHC 331 (KB) (*‘Curtin’*):
 - i) Whether it is necessary or appropriate to identify, clearly, the categories of persons unknown: *Curtin* at [356], [360].
 - ii) Whether newcomer persons unknown can be served, even under the terms of an alternative service order: *Curtin* at [357]-[359].
 - iii) Whether an injunction should include a requirement that the Court’s permission is obtained before contempt proceedings can be instituted: *Curtin* in [390].

Identifying the categories of persons unknown

25. At [356] of *Curtin*, Nicklin J concluded that “there is now no need carefully to define the category of “Persons Unknown” who are to be defendants to the claim...” In *Esso* at [28], Sweeting J considered the impact of Nicklin J’s decision in the context of an injunction review hearing. He noted differing approaches to the issue in various recent High Court decisions but concluded that the existing detailed description of the persons unknown defendants in *Esso* “best adheres to the guidance in *Wolverhampton* by identifying a class by reference to conduct...”
26. I considered the definition of the persons unknown defendants at the outset of the trial in the index case: see [13] of *NWBC*. Notwithstanding the comments

made in *Curtin*, I am mindful of the Supreme Court's guidance in *Wolverhampton* at [221] that "...where the persons sought to be subjected to the injunction are newcomers, the possibility of identifying them as a class by reference to conduct prior to what would be a breach (and, if necessary, by reference to intention) should be explored and adopted if possible." I remain of the view that current detailed definition of the Persons Unknown defendants 19A, 19B, 19C and 19D best complies with the guidance in *Wolverhampton* and I do not consider it warrants amendment. There is thus no reason to amend the description of the Defendants in this case.

Service of the persons unknown Defendants

27. I am not persuaded that it is appropriate to interfere with the Injunction's alternative service provisions in respect of the persons unknown Defendants. In so far as there is a tension between *Curtin* and *Wolverhampton* as to whether service on persons unknown is required, this Court is bound by the Supreme Court. The Supreme Court made repeated references in *Wolverhampton* to the requirement to inform newcomers of an order. For example, at [230]: "...the obligation on the local authority to take steps actively to draw the order to the attention of all actual and potential respondents; to give any person potentially affected by it full information as to its terms and scope, and the consequences of failing to comply with it; and how any person affected by its terms may make an application for its variation or discharge..." Further, at [231]: "any application for such an order must in our view make full and complete disclosure of all the steps it proposes to take (i) to notify all persons likely to be affected by its terms... This will no doubt include placing notices in and around the relevant sites where this is practicable; placing notices on appropriate websites and in relevant publications; and giving notice to relevant community and charitable and other representative groups." The alternative service provisions required by the Injunction remain consistent with the need for publication identified in *Wolverhampton*.

Permission to bring a contempt application

28. The requirement for permission before a contempt application could be brought was adopted in *Curtin*, and also by Fordham J 'in the particular circumstances of the present case' when granting an interim injunction in *University of Cambridge v Persons Unknown* [2025] EWHC 724 ('*Cambridge*') at [30]. However, at the review hearing in *Esso*, Sweeting J at [29] declined to impose such a requirement, noting that the courts already possess adequate mechanisms to address disproportionate committal application and that there was no evidence in the case before him that the claimants were bringing trivial committal applications.
29. I am not persuaded that it would be appropriate to add a permission requirement in the index case. Firstly, whether a permission requirement is appropriate is a fact specific case management decision. There is no evidence on the facts of this case that the Council, nor the police in utilising the power of arrest, have misused the contempt process. Secondly, the facts of the index case are

materially different to *Curtin*, *Cambridge* and *Esso* in that a power of arrest exists. The activation of the power of arrest commences the contempt process, requiring an arrested defendant to be produced before a court within 24 hours. At [103] of *NWBC*, I discussed why a power of arrest was appropriate. Those reasons remain valid. The imposition of permission requirement would completely undermine the utility of the power of arrest.

30. In conclusion, I am satisfied that there have been no material changes to the facts, or any material legal developments, that warrant amendment or discharge of the Injunction and power of arrest. In accordance with paragraph 5 of the Injunction, a further review hearing will take place in 12 months.

HHJ Emma Kelly

SCHEDULE A

SCHEDULE OF DEFENDANTS

(2) THOMAS BARBER
(3) MICHELLE CADET-ROSE
(4) TIMOTHY HEWES
(5) JOHN HOWLETT
(6) JOHN JORDAN
(7) CARMEN LEAN
(8) ALYSON LEE
(9) AMY PRITCHARD
(10) STEPHEN PRITCHARD
(11) PAUL RAITHBY
(14) JOHN SMITH
(15) BEN TAYLOR
(17) ANTHONY WHITEHOUSE
(19A) PERSONS UNKNOWN WHO, OR WHO INTEND TO, PARTICIPATE IN PROTESTS WITHIN THE SITE KNOWN AS KINGSBURY OIL TERMINAL, TAMWORTH B78 2HA (THE “TERMINAL”) AGAINST THE PRODUCTION OF FOSSIL FUELS AND/OR THE USE OF FOSSIL FUELS, AND/OR THE GRANT OF LICENCES TO EXTRACT FOSSIL FUELS;
(19B) PERSONS UNKNOWN WHO, OR WHO INTEND TO, PARTICIPATE IN PROTESTS IN THE LOCALITY OF THE TERMINAL, AGAINST THE PRODUCTION OF FOSSIL FUELS AND/OR THE USE OF FOSSIL FUELS AND/OR THE GRANT OF LICENCES TO EXTRACT FOSSIL FUELS, AND WHO, IN CONNECTION WITH ANY SUCH PROTEST, DO, OR INTEND TO DO, OR INSTRUCT ASSIST OR ENCOURAGE ANY OTHER PERSON TO DO, ANY OF THE FOLLOWING: (A) ENTER OR ATTEMPT TO ENTER THE TERMINAL; (B) CONGREGATE AT ANY ENTRANCE TO THE TERMINAL; (C) OBSTRUCT ANY ENTRANCE TO THE TERMINAL;

(D) CLIMB ON TO OR OTHERWISE DAMAGE OR INTERFERE WITH ANY VEHICLE OR ANY OBJECT ON LAND (INCLUDING BUILDINGS, STRUCTURES, CARAVANS, TREES AND ROCKS);

(E) DAMAGE ANY LAND INCLUDING (BUT NOT LIMITED TO) ROADS, BUILDINGS, STRUCTURES OR TREES ON THAT LAND, OR ANY PIPES OR EQUIPMENT SERVING THE TERMINAL ON OR BENEATH THAT LAND;

(F) AFFIX THEMSELVES TO ANY OTHER PERSON OR OBJECT OR LAND (INCLUDING ROADS, STRUCTURES, BUILDINGS, CARAVANS, TREES OR ROCKS);

(G) ERECT ANY STRUCTURE;

(H) ABANDON ANY VEHICLE WHICH BLOCKS ANY ROAD OR IMPEDES THE PASSAGE OF ANY OTHER VEHICLE ON A ROAD OR ACCESS TO THE TERMINAL;

(I) DIG ANY HOLES IN OR TUNNEL UNDER (OR USE OR OCCUPY EXISTING HOLES IN OR TUNNELS UNDER) LAND, INCLUDING ROADS; OR

(J) ABSEIL FROM BRIDGES OR FROM ANY OTHER BUILDING, STRUCTURE OR TREE ON LAND.

(19C) PERSONS UNKNOWN WHO, OR WHO INTEND TO, ORGANISE, PUBLICISE OR PROMOTE ANY PROTEST WITHIN THE TERMINAL AGAINST THE PRODUCTION OF FOSSIL FUELS AND/OR THE USE OF FOSSIL FUELS AND/OR THE GRANT OF LICENCES TO EXTRACT FOSSIL FUELS.

(19D) PERSONS UNKNOWN WHO, OR WHO INTEND TO, ORGANISE, PUBLICISE OR PROMOTE ANY PROTEST IN THE LOCALITY OF THE TERMINAL, AGAINST THE PRODUCTION OF FOSSIL FUELS AND/OR THE USE OF FOSSIL FUELS AND/OR THE GRANT OF LICENCES TO EXTRACT FOSSIL FUELS, AT WHICH PROTEST THEY INTEND OR FORESEE OR OUGHT TO FORESEE THAT ANY OF THE ACTS DESCRIBED AS PART OF THE DESCRIPTION OF DEFENDANT 19B WILL BE CARRIED OUT.

(20) JOHN JORDAN

(22) MARY ADAMS

(23) COLLIN ARIES

(24) STEPHANIE AYLETT

(25) MARCUS BAILIE

(28) PAUL BELL

(29) PAUL BELL

(30) SARAH BENN
(31) RYAN BENTLEY
(32) DAVID ROBERT BARKSHIRE
(33) MOLLY BERRY
(34) GILLIAN BIRD
(36) PAUL BOWERS
(37) KATE BRAMFITT
(38) SCOTT BREEN
(40) EMILY BROCKLEBANK
(42) TEZ BURNS
(43) GEORGE BURROW
(44) JADE CALLAND
(46) CAROLINE CATTERMOLLE
(48) MICHELLE CHARLESWORTH
(49) ZOE COHEN
(50) JONATHAN COLEMAN
(53) JEANINIE DONALD-MCKIM
(55) JANINE EAGLING
(56) STEPHEN EECKELAERS
(58) HOLLY JUNE EXLEY
(59) CAMERON FORD
(60) WILLIAM THOMAS GARRATT-WRIGHT
(61) ELIZABETH GARRATT-WRIGHT
(62) ALASDAIR GIBSON
(64) STEPHEN GINGELL
(65) CALLUM GOODE
(68) JOANNE GROUNDS
(69) ALAN GUTHRIE
(70) DAVID GWYNE
(71) SCOTT HADFIELD
(72) SUSAN HAMPTON
(73) JAKE HANDLING
(75) GWEN HARRISON

(76) DIANA HEKT
(77) ELI HILL
(78) JOANNA HINDLEY
(79) ANNA HOLLAND
(81) JOE HOWLETT
(82) ERIC HOYLAND
(83) REUBEN JAMES
(84) RUTH JARMAN
(85) STEPHEN JARVIS
(86) SAMUEL JOHNSON
(87) INEZ JONES
(88) CHARLOTTE KIRIN
(90) JERRARD MARK LATIMER
(91) CHARLES LAURIE
(92) PETER LAY
(93) VICTORIA LINDSELL
(94) EL LITTEN
(97) DAVID MANN
(98) DIANA MARTIN
(99) LARCH MAXEY
(100) ELIDH MCFADDEN
(101) LOUIS MCKECHNIE
(102) JULIA MERCER
(103) CRAIG MILLER
(104) SIMON MILNER-EDWARDS
(105) BARRY MITCHELL
(106) DARCY MITCHELL
(107) ERIC MOORE
(108) PETER MORGAN
(109) RICHARD MORGAN
(110) ORLA MURPHY
(111) JOANNE MURPHY
(112) GILBERT MURRAY

(113) CHRISTIAN MURRAY-LESLIE
(114) RAJAN NAIDU
(115) CHLOE NALDRETT
(117) DAVID NIXON
(118) THERESA NORTON
(119) RYAN O TOOLE
(120) GEORGE OAKENFOLD
(121) NICOLAS ONLAY
(122) EDWARD OSBOURNE
(123) RICHARD PAINTER
(124) DAVID POWTER
(125) STEPHANIE PRIDE
(127) SIMON REDING
(128) MARGARET REID
(129) CATHERINE RENNIE-NASH
(130) ISABEL ROCK
(131) CATERINE SCOTHORNE
(133) GREGORY SCULTHORPE
(135) VIVIENNE SHAH
(136) SHEILA SHATFORD
(137) DANIEL SHAW
(138) PAUL SHEEKY
(139) SUSAN SIDEY
(141) JOSHUA SMITH
(142) KAI SPRINGORUM
(145) HANNAH TORRANCE BRIGHT
(146) JANE TOUIL
(150) SARAH WEBB
(151) IAN WEBB
(153) WILLIAM WHITE
(155) LUCIA WHITTAKER-DE-ABREU
(156) EDRED WHITTINGHAM
(157) CAREN WILDEN

(158) MEREDITH WILLIAMS



Farnborough airport and its super-rich clients like Boris Johnson just got the Extinction Rebellion treatment

by [The Canary](#) — 3 June 2024 in [News](#) Reading Time: 4 mins read

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An outer London airport – Farnborough – frequently used by the super-rich and politicians, [including Boris Johnson](#), has been the target of [Extinction Rebellion](#) and other groups. They highlighted how the flying habits of the super rich are effectively helping to kill us all via their contribution to the [climate crisis](#).

Farnborough: you're killing us all!

On Sunday 2 June, a group of activists blocked all the main gates of Farnborough airport, the biggest private jet airport in the UK, which has [plans to greatly expand](#). This was part of an international week of action targeting private jets and the injustice of aviation, with protests happening in Denmark, Germany, Mexico, Norway, Sweden, Switzerland, and the US.

At Farnborough, protesters barricaded the airport's Gulfstream Gate with the Extinction Rebellion pink boat:

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Ively Gate had four protesters locked on to oil drums:



At the airport's departure gate activists mounted two tripods blockading the entrance:



A fourth group of protesters moved between the airport's other gates to block them:



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2050	AMAZON DIEBACK
2050	CATASTROPHIC UK FLOODS
2100	EUROPEAN DESERTS



Dr Jessica Upton, a veterinary surgeon and foster carer from Oxford, said:

I'm here today because private airports are an abomination. Expanding Farnborough would be putting the indulgent wants of the rich minority over the needs of the majority. Local people need cleaner air and less noise pollution, and the world's population urgently needs rapid reductions in greenhouse gas emissions to survive.

Private airports disproportionately contribute to climate breakdown and closing them would boost our chances of sticking to the Paris Climate Accords, the supposedly legally binding international treaty agreed to and signed by our government.

More than 100 people took part in the protests and several were arrested.

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Farnborough airport: private jets should be banned

Inês Teles, campaigner at Stay Grounded, said:

It's utterly obscene that, during a climate and cost of living crisis, while people are burning under scorching heat in India and Mexico or being displaced by catastrophic flooding in Brazil, the super-rich keep flying on their private jets and pouring gas in a world on fire.

These are the worst form of bullshit flights, and need to be banned, as well as short-haul flights or night flights. We need to stop this madness and hold the super-rich and institutions accountable

1. Ban Private Jets
2. Tax Frequent Flyers
3. Make Polluters Pay

Gianluca Grimalda, university researcher and climate activist, said:

Private jets are the single most polluting form of transport, causing about 10 times more CO2 emissions per passenger than a regular flight, and up to 100 times more than trains. About two thirds of such flights are done for leisure over short stretches on which a lower-emitting alternative exists.

The 'collateral damage' of such flights is to cause about 20.000 deaths every year, as we know that every 4.000 ton of CO2 will kills one person and private jets produce about 80 million tons of CO2 every year. This is unacceptable, inhumane, and abhorrent.

Aviation is the pinnacle of climate injustice

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But private jets are not the only problem: aviation as a whole is the pinnacle of climate injustice, with 1% of the population being responsible for 50% of its emissions and 80% of the world population never having set foot on a plane.

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Palestine Action hit two Barclays branches - annihilating one and redecorating the other

The rich need to step up and cut superfluous habits such as using private jets, if the entire society is to support a move towards the necessary change.

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richest 1% grabbed nearly two-thirds of all new wealth created since 2020, totaling \$42 trillion, leaving the bottom 99% of the world's population.

campaign seek to pave the road towards a fairer wealth distribution: an annual wealth tax could raise \$1.7 trillion a year, enough to deliver a 10-year plan to end hunger, support climate impacts, and deliver universal healthcare and social protection for everyone living in

most pressing problems, and questions of social and economic justice must be at the top of the agenda.

Featured image and additional images via Extinction Rebellion





Planes spray-painted at UK airfield where Just Stop Oil says Taylor Swift jet landed – video

UK news

This article is more than **1 year old**

Two people arrested after activists spray private jets with paint at Stansted

Just Stop Oil activists cut through fence to break into Essex airfield where Taylor Swift's plane stationed

Matthew Weaver

Thu 20 Jun 2024 10.31 BST

Just Stop Oil activists have sprayed orange paint over private jets at Stansted airport on the airfield where Taylor Swift's plane is stationed, the environmental group has said.

Two activists, Jennifer Kowalski, 28, a former sustainability manager from Dumbarton, and Cole Macdonald, 22, from Brighton, broke into a private airfield in Stansted at 5am on Thursday before targeting the jet.

Essex police said two women, aged 28 and 22, had been arrested.

They said: "Officers were on the scene within minutes and detained two people. The airport and flights are operating as normal. A 22-year-old woman from Brighton and a 28-year-old woman from Dumbarton have been arrested on suspicion of criminal damage and interference with the use or operation of national infrastructure."

In a post on X, Just Stop Oil (JSO) said two activists had “cut the fence into the private airfield at Stansted where taylorswift13’s jet is parked, demanding an emergency treaty to end fossil fuels by 2030”.

The accompanying video showed one of the activists cutting a hole in the fence before spraying the paint over the jets.

In February [lawyers for Taylor Swift threatened legal action](#) against a student who is tracking Swift’s jet use via social media. The X account CelebJets found that the plane owned by Swift was the most used by celebrities emitting more than 8,000 tonnes of carbon. A spokesperson for the singer denied that Swift was on every flight, saying her plane is loaned out to others.

The Stansted demonstration came as English Heritage pleaded with JSO to stop targeting cultural monuments after two protesters [sprayed orange powder on Stonehenge](#).

Nick Merriman, the chief executive of the national body that cares for hundreds of national properties and sites, [including Stonehenge](#), condemned the protest as “vandalism to one of the world’s most celebrated ancient monuments”.

Two [JSO activists were arrested](#) after the incident on Wednesday before summer solstice celebrations at the monument, which are due to begin on Thursday evening.

The group has targeted a series of cultural institutions in recent months including disrupting a Proms concert at the Royal Albert Hall; damaging a case around the Magna Carta at the British Library and throwing tomato soup over Vincent van Gogh’s Sunflowers in the National Gallery.

Speaking to BBC Radio 4’s Today programme on Tuesday, Merriman said: “We respect the rights of people to protest as an important right in British life. But we wish people would channel their protests away from cultural heritage sites, museums and galleries, because we feel that doesn’t actually help their cause and causes this huge upset and disruption to the operation of these important sites.”

In a statement about the Stonehenge protest, Just Stop Oil said it was time for “megalthic action” to stop the extraction and burning of oil, gas and coal by 2030.

It said: “Continuing to burn coal, oil and gas will result in the death of millions. We have to come together to defend humanity, or we risk everything. That’s why Just Stop Oil is demanding that our next government sign up to a legally binding treaty to phase out fossil fuels by 2030.”

Merriman said the protest was “difficult to understand”.

He said: “Stonehenge is about 5,000 years old, and people in those ancient times were living so sustainably, and the stones are a testament to the desire of people to connect with nature and the Earth and the sun and the moon as well as each other.”

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Dozens of campaigners held over alleged airport plans



PA

Police said the Just Stop Oil members had been arrested under the Public Order Act

27 June 2024

Updated 28 June 2024

Dozens of Just Stop Oil supporters suspected of planning to disrupt airports this summer have been arrested across England.

The Metropolitan Police said 27 people were taken into custody, including some believed to be "key organisers" for the climate group.

Six arrests were made in east London, four at Gatwick airport, and the rest from forces across the country.

The force added the six who were arrested on Thursday evening at a community centre in London were there "as part of a publicly-advertised event promoting airport disruption".

The operation took place in Gloucestershire, Oxfordshire, Devon, Essex, Manchester, Surrey, Sussex, Norfolk and West Yorkshire, a Met spokesperson said.

The 27 were detained under the Public Order Act which makes it illegal to conspire to disrupt national infrastructure.

Four people arrested on Tuesday after being identified at Gatwick Airport and have since been released on bail.

Ch Supt Ian Howells added: "We know Just Stop Oil are planning to disrupt airports across the country this summer which is why we have taken swift and robust action now.

"Our stance is very clear that anyone who compromises the safety and security of airports in London can expect a strong response from officers or security staff.

"Airports are complex operating environments which is why we are working closely with them, agencies and other partners on this operation."

Suspects released on bail are subject to conditions which include not travelling within one kilometre of any UK airport unless passing by while on a mode of transport.

In response to the wave of arrests, a Just Stop Oil spokesman said: "It isn't a massive surprise."

He added that disruption is necessary because people are "dropping dead around the world" from extreme heat, and "tipping points" are being passed.

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Just Stop Oil protesters ‘arrested and removed’ after blocking Gatwick Airport

MERIDIAN | GATWICK AIRPORT | SUSSEX POLICE | ⌚ Monday 29 July 2024 at 10:23am



Seven people entered the South Terminal at around 8am and “used suitcases with lock-on devices to block the departure gates”, Just Stop Oil claimed.

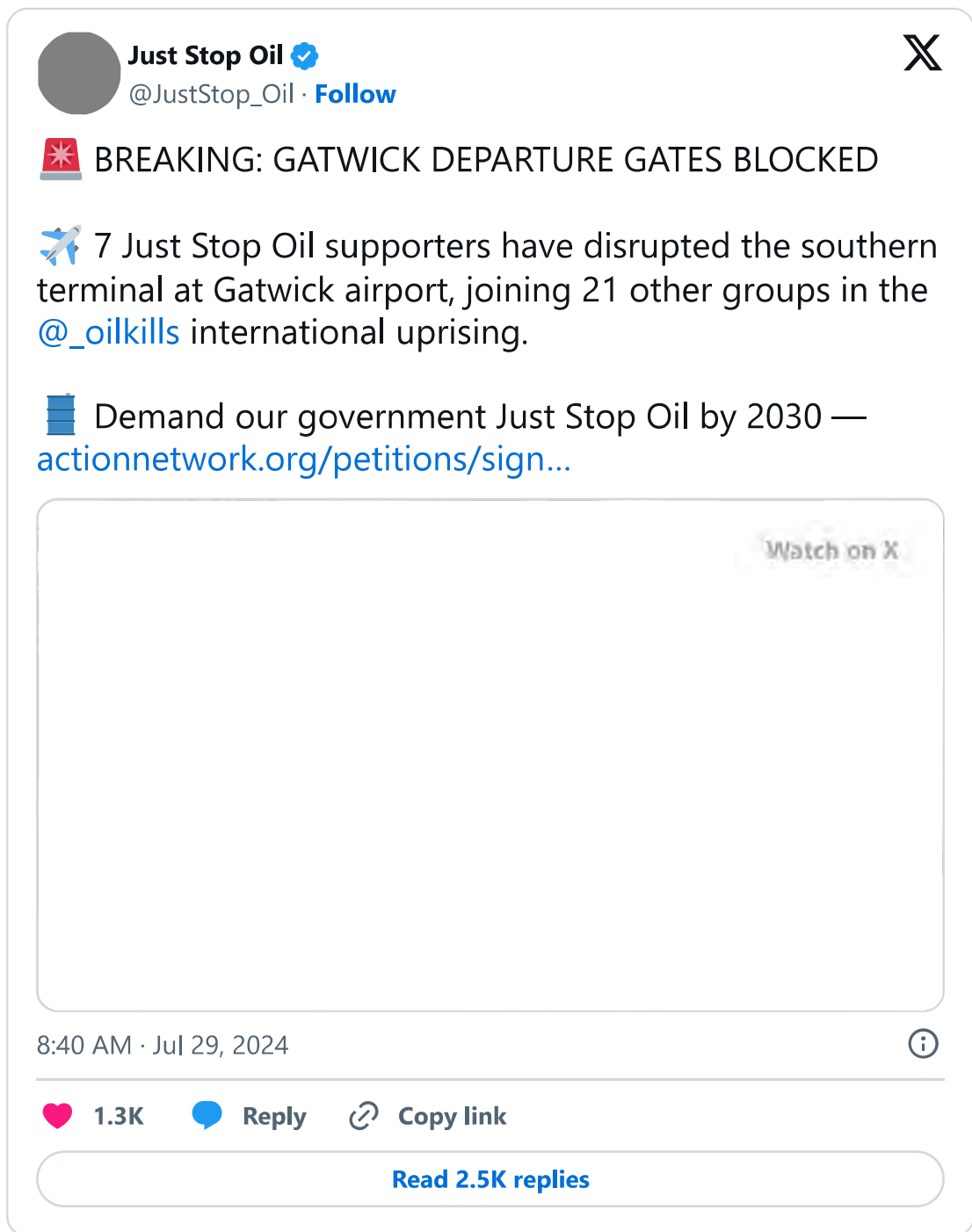
Credit: Just Stop Oil

Just Stop Oil supporters who blocked departure gates at Gatwick Airport have been arrested and are being removed, the airport has said.

Seven people entered the South Terminal at around 8am and “used suitcases with lock-on devices to block the departure gates”, Just Stop Oil claimed.

A video shared by the group showed the protesters sitting on the floor inside the airport, blocking an entrance.

Passengers with suitcases appeared to step over the activists and continue with their journeys.



A London Gatwick spokesman said: “London Gatwick is open and operating normally today.

“There are a small number of protesters at the airport who have now been arrested and are being removed from the airport.”

In central London, environmental protesters have caused criminal damage and blocked access to an office building on Old Queen Street in Westminster, the Metropolitan Police said.

One person has been arrested for criminal damage, and the incident is ongoing, the force added.

Last week, 10 Just Stop Oil activists suspected of planning to disrupt Heathrow Airport were arrested.

The latest action is part of the “Oil Kills international uprising”, the group said, taking place at airports around the world.

Earlier this month, the airport became the latest major airport to secure a High Court injunction in an attempt to stop would-be environmental activists trespassing on its land after receiving police intelligence over protest plans.

Timothy Morshead KC, representing Gatwick at the hearing, said such action could cause “severe disruption and financial loss” and “significant delays for passengers”.

A spokesperson for Sussex Police said: "Police responded to a report that protesters were demonstrating near the security entrance at the South Terminal in Gatwick Airport at around 8am today (July 29).

"Eight people have been arrested on suspicion of interfering with public infrastructure, and a heightened police presence should be expected at this time.

"The airport is functioning as usual, and no disruption has been caused by protest activity."

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Just Stop Oil supporter detained and forcibly removed from Heathrow for holding ‘Oil Kills’ sign

Press / July 27, 2024

A Just Stop Oil supporter has been detained by police and forcibly removed for holding a sign at Heathrow Terminal Five. Just Stop Oil is working with groups internationally to demand governments establish a fossil fuel treaty, to end the extraction and burning of oil, gas and coal by 2030. [1]

At around 10:20 am, a Just Stop Oil supporter entered Terminal Five and held a sign which read ‘Oil Kills’. By around 10:40, a large group of police and security had surrounded the Just Stop Oil supporter and two people filming the incident, demanding personal details. They were moved into a side corridor and informed they were in breach of an injunction, a private law bought by a corporation. The police then forcibly removed all three from the airport.

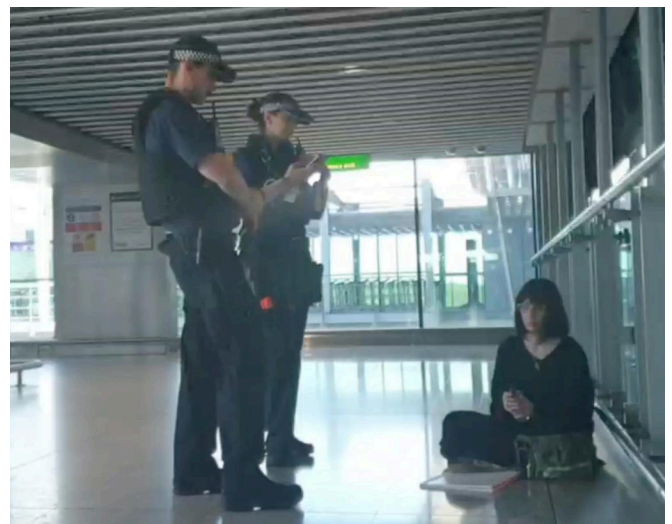
"While the earth broke the record for the hottest day on record, not once, but twice this week, the UK police and judiciary are continuing to arrest and imprison those raising the alarm. Our governments care little about our lives and our future as a species. We need our leaders to protect our communities and commit to an international, legally binding treaty to end the extraction and burning of oil, gas and coal by 2030."



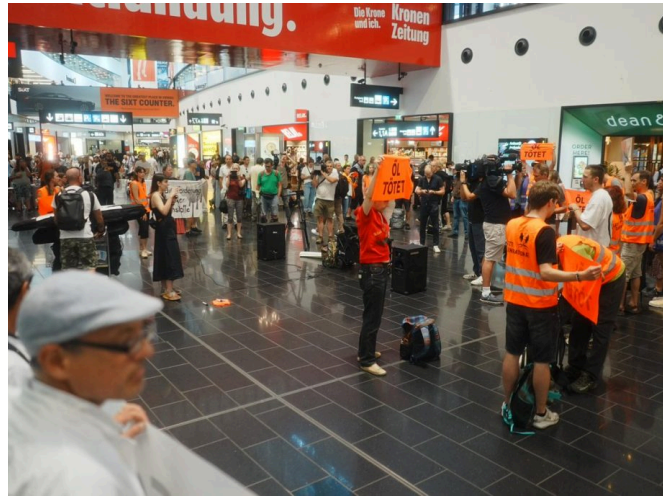
A Just Stop Oil spokesperson said:

"Governments and fossil fuel companies are waging war on humanity. Innocent people already face unlivable conditions and scientists are warning us we are on course for large parts of the world becoming uninhabitable, as greater levels of carbon in the atmosphere lead to irreversible runaway heating. Politicians are prepared to allow hundreds of millions to die in order to protect the wealthy corporations that are destroying everything."

"This summer, we're joining an international uprising taking nonviolent collective action at airports to protect our families and communities. We demand that our governments stop extracting and burning oil, gas and coal by 2030, and that they support and finance other countries to make a fast, fair and just transition. They must sign a Fossil Fuel Treaty to end the war on humanity before we lose everything."



demonstrations taking place around the world at airports in Austria, the Netherlands, Switzerland, Canada and USA. [2] [3]



This week, 13 groups over 10 countries have taken part in 'Oil Kills', an international uprising demanding governments establish a fossil fuel treaty to end the extraction and burning of oil, gas and coal by 2030. They are Letzte Generation in Germany, Folk Mot Fossilmakta in Norway, XR Finland, Futuro Vegetal in Spain, Just Stop Oil in the UK, Drop Fossil Subsidies and Act Now – Liberate in Switzerland, Letzte Generation Austria, Extinction Rebellion and Scientists Rebellion, Sweden and Last Generation Canada, XR Boston and Scientist Rebellion Turtle Island, USA. [4]

The 'Oil Kills' international uprising comes as it was announced on Wednesday that the record for the world's hottest day has been broken twice in one week. On Monday, the global average surface air temperature reached 17.15C, breaking the record of 17.09C set on Sunday. This beats the record set in July 2023. [5]

Dr Joyce Kimutai, climate scientist at Imperial College London, said: *"This is exactly what climate science told us would happen if the world continued burning coal, oil and gas. It will continue getting hotter until we stop burning fossil fuels and reach net zero emissions."* [6]

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.

ENDS

Press contact: 07762 987334

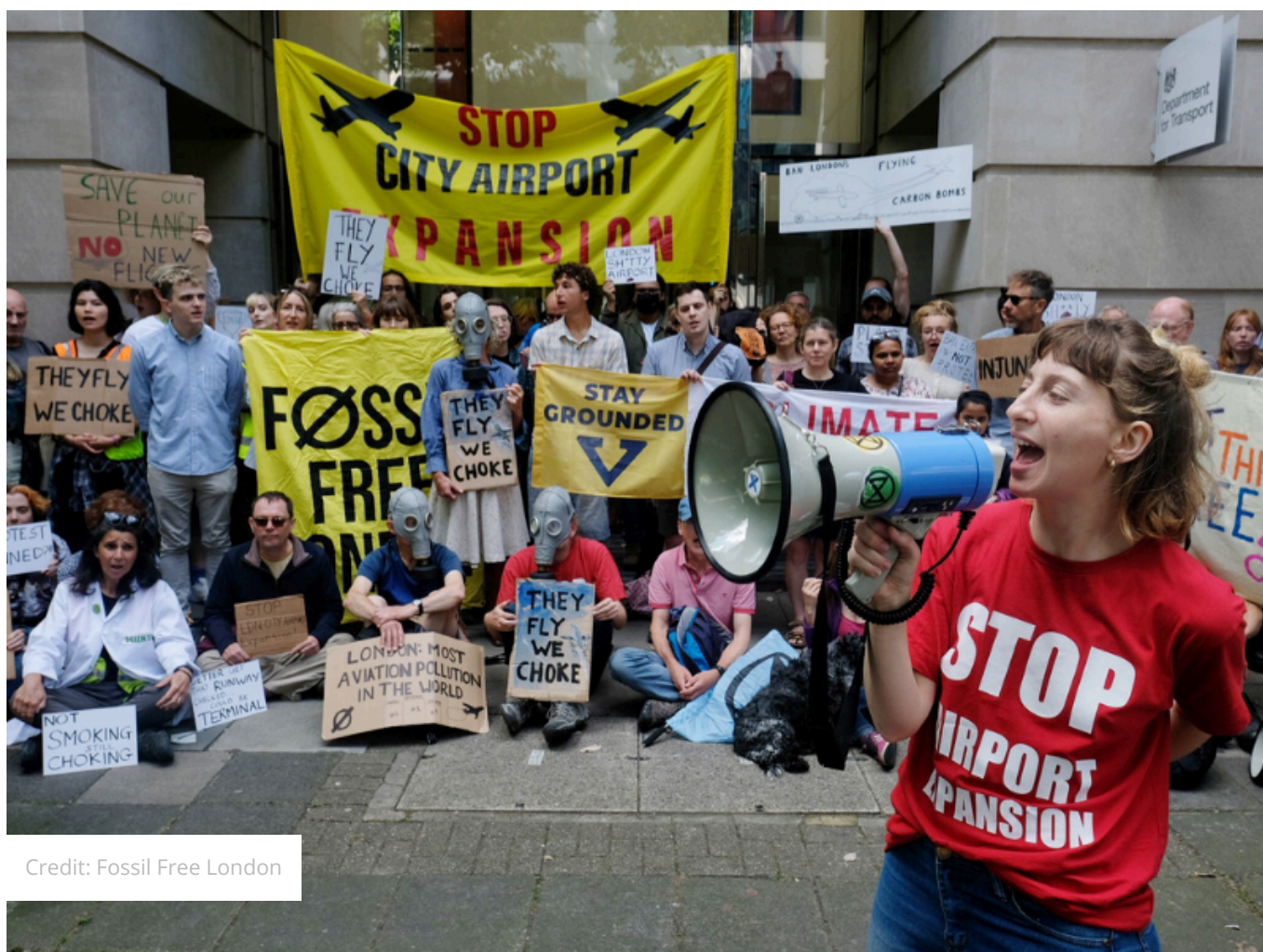
Press email: juststopoilpress@protonmail.com

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

Almost 200 protest London City Airport's expansion plans

🕒 28 July, 2024 5:26 pm 📖 3 Min Read

Activists chanted 'they fly, we choke', outside the Department of Transport yesterday. The government is shortly expected to make a decision on the airport's expansion, reports Marco Marcelline



Credit: Fossil Free London

Close to 200 air pollution and climate campaigners gathered outside the Department for Transport yesterday (27th July) to protest against the proposed expansion of a London airport with a flight path over Leytonstone.

Chanting 'they fly, we choke', protesters were calling on the Department of Transport to reject London City Airport's expansion bid.

Activist group Fossil Free London had originally planned to do the action at the airport itself but they received notice of an [injunction](#) from the airport's lawyers stopping any environmental protest there.

The penalty for breaching the injunction could have been as much as two years in prison, activists said.

< f X d p e in >

but airport bosses appealed it, meaning a final decision will now be taken by the government.

The airport, based in the docklands, wants to extend its cut-off time for flights from 1pm on Saturdays to 6.30pm all year round and 7.30pm during the summer months, as well increasing its daily limit of flights from six to nine between 6.30am and 7am.

Speaking previously, the airport's CEO Robert Sinclair said the proposals were part of a wider plan to increase the number of annual passengers from 6.5million to nine million by 2031.

Sinclair has argued that if approved, more jobs would be made available for local residents, while there would be more affordable flights to different destinations. In terms of its environmental commitment, City Airport has pledged to use a "cleaner, quieter new generation aircraft".

But, environmental activists and local residents have long-argued that the airport causes significant pollution. Protesters have also stressed that it does not serve the communities living around it who cannot afford a plane ticket due to high levels of poverty in Newham.



Credit: Fossil Free London

The airport is popular with bankers flying in business class and in 2023, one in four flights leaving the airport were more than half empty.

Joanna Warrington, spokesperson for Fossil Free London, said: "As businessmen fly off over one of London's poorest boroughs, we're left choking on their excess fumes that fuel climate collapse."

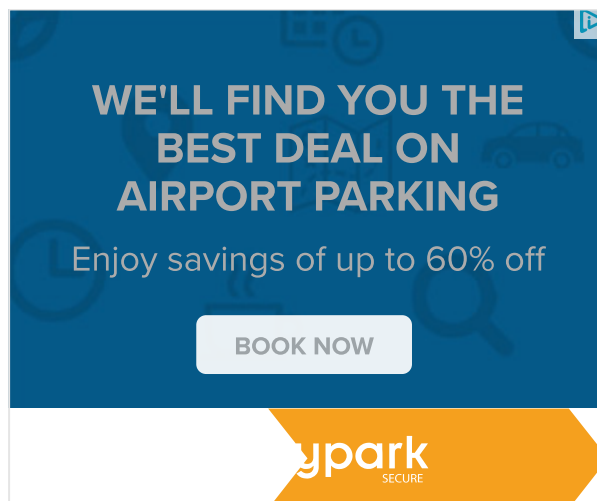


locals who are already sick of all the noise and air pollution over their homes. And worse still, after appealing a unanimous decision by the local council to stop an increase in flights, they've gagged local dissent through expensive and threatening anti-protest injunctions.

Joanna added: "Our government needs to listen to Londoners, reject these plans and act for our health and futures."

Toni Cottee from South West Essex Fight the Flights said: "Flights have been growing and growing in number with bigger and bigger jets, more and more disturbance and emissions. Local people can't have a conversation in their own front gardens when the planes are going over. Now the airport wants to increase this and abandon the only respite residents get at the weekend.

"We need this airport closed. It's in the wrong place and we're living in a climate emergency – we need to reduce flights, not increase them."



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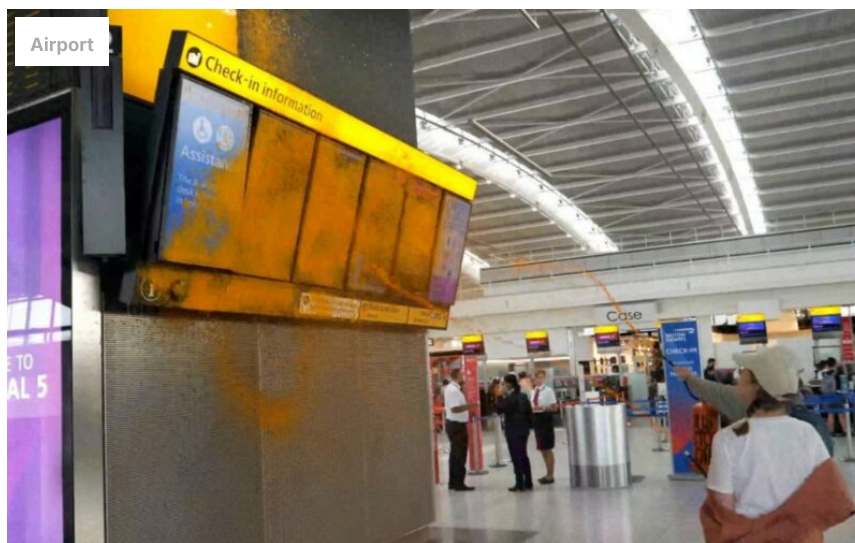
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Environmental activists arrested at Heathrow after spray painting terminal

By **Goda Labanauskaite**
 July 31, 2024, 06:00 (UTC +3)

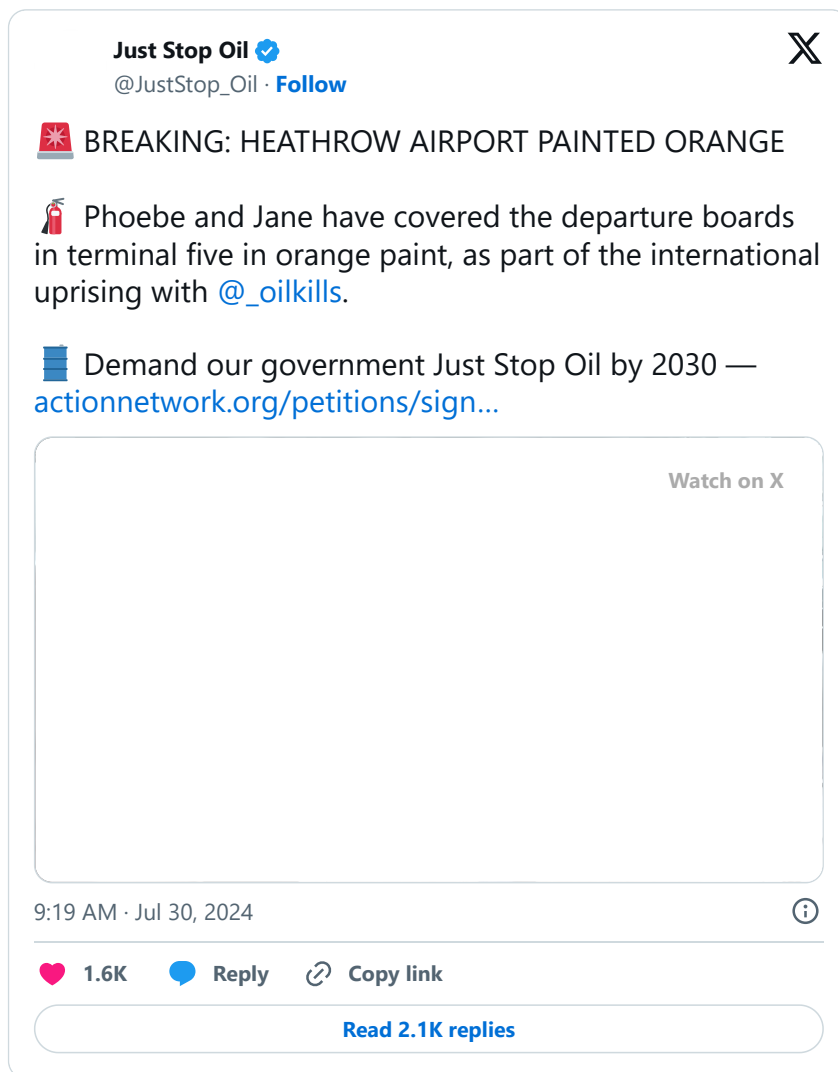


Two activists spraying orange paint over Terminal 5 / Just Stop Oil

Two activists from the environmental group Just Stop Oil have been arrested at London-Heathrow Airport (LHR) after spraying orange paint over Terminal 5.

Footage of the incident, which occurred on the morning of July 30, 2024, was widely shared on social media by the environmental group and travelers.

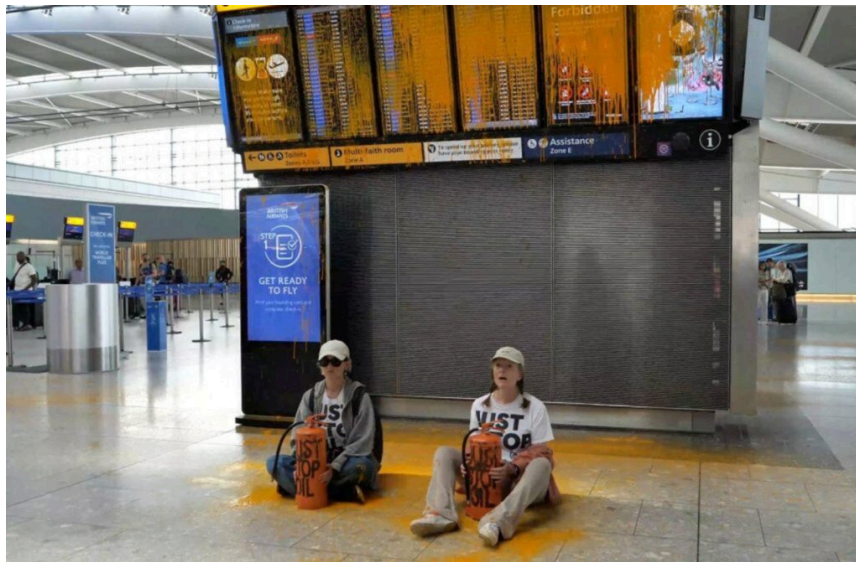




Two protestors, Phoebe Plummer (22) and Jane Touil (58), entered the airport's Terminal 5 at around 8:35 local time. They were wearing white 'Just Stop Oil' T-shirts and carrying two fire extinguishers filled with orange paint.

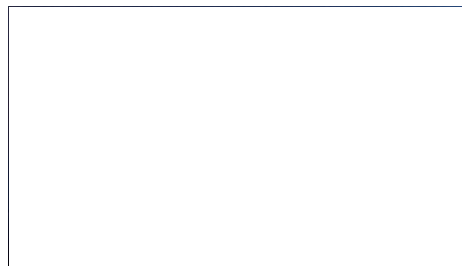
The protestors sprayed paint on the entrance hall and proceeded to spray the departure boards, windows, floors, and walls of Terminal 5. Plummer and Touil then held a short sit-in demonstration near the main departure boards.





Local police and security services arrived on the scene within minutes and blocked off the area. By around 8:50 local time, police had taken Plummer and Touil to a police van.

"People around the world are rising up to demand an end to oil by 2030," Plummer said before she was taken by the police. "This is an international problem, so ordinary people are doing what our politicians will not."



"Ordinary people have to stand up and make their governments do the right thing, because without pressure from us, they won't," Touil added: "I feel so angry and betrayed that politicians have let this happen when they've known about climate breakdown for over 50 years."

Airport officials reported that the airport is continuing to operate as usual, and passengers are traveling as planned.

"We are in full agreement that the aviation industry needs to decarbonize, but unlawful and irresponsible protest activity is not the way forward and will not be tolerated," a spokesperson for London-Heathrow said in a statement.



Eight Just Stop Oil activists arrested at Gatwick Airport after departure gate protest, Sussex Police say

Seven Just Stop Oil activists were seen sitting on the floor inside the airport with their hands inside of lock-on devices. Gatwick Airport says the protestors were being removed from the airport at around 9.15am.

🕒 Monday 29 July 2024 10:43, UK





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Eight Just Stop Oil protesters have been arrested at Gatwick airport after activists used suitcases with lock-on devices to demonstrate near a security gate.

Seven activists entered the airport's southern terminal at around 8am, the protest group said, as an image showed the protesters sitting on the floor and blocking an entrance.

A London Gatwick spokesperson said at around 9.15am that the airport "is open and operating normally today", adding: "There are a small number of protestors at the airport who have now been arrested and are being removed from the airport."

In a statement, Sussex Police said eight people were arrested on suspicion of interfering with public infrastructure, and added "a heightened police presence should be expected at this time".

Video posted by Just Stop Oil also shows travellers walking over the activists, whose hands were seen inside the lock-on devices.

"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," the group said in a statement.

"This summer, areas of key importance to the fossil fuel economy will be declared sites of civil resistance around the world."

The group added the protest at Gatwick comes as part of the international campaign Oil Kills, and said 21 groups across 12 countries have demonstrated at 17 airports so far.

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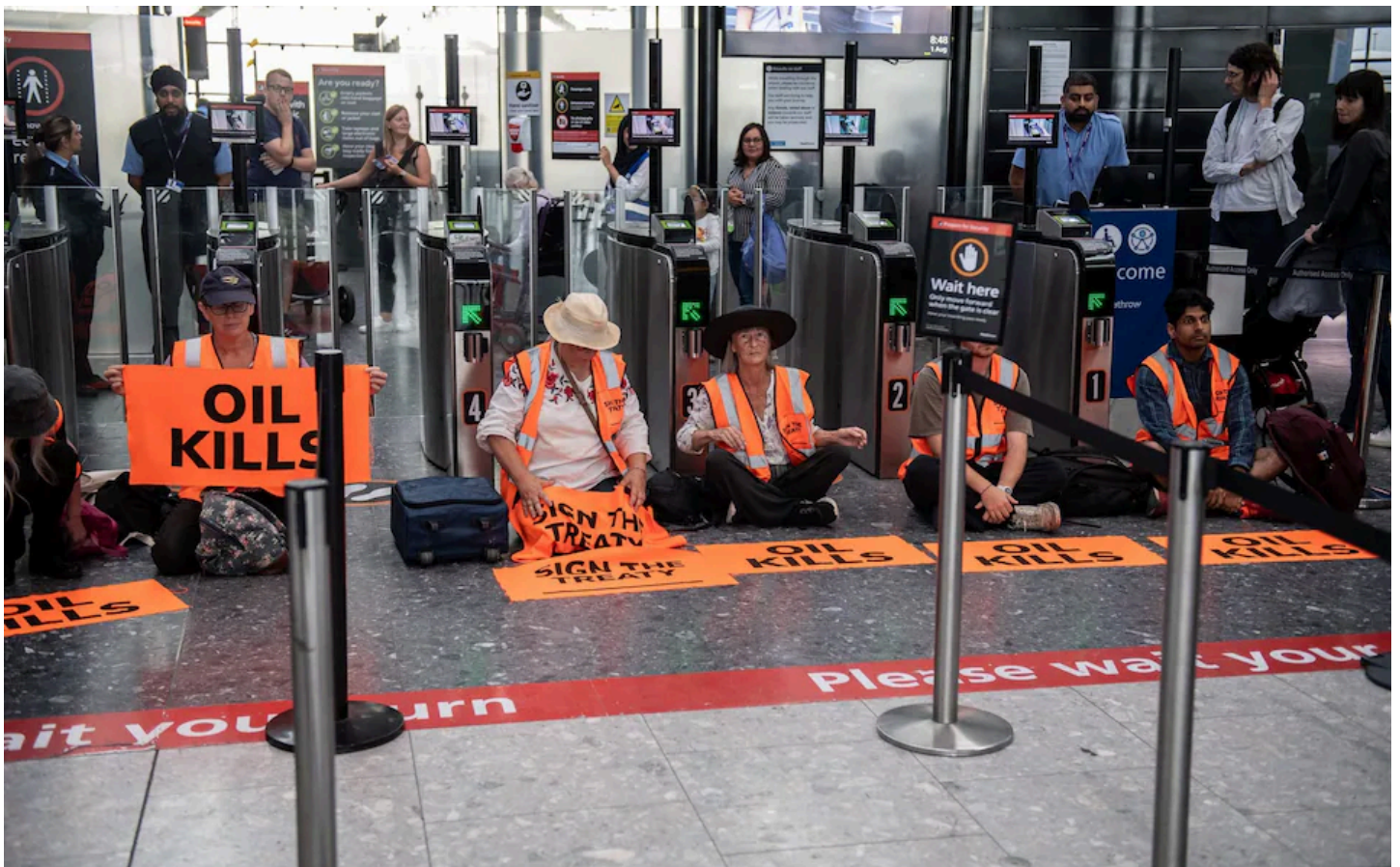
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Just Stop Oil Heathrow airport protest fails – again

Demonstration follows several other attempts to block holidaymakers at airports this week

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Just Stop Oil protesters sat or stood by the gates to departures in Terminal Five before some were physically removed by police. Credit: Guy Smallman/Getty Images

Gareth Corfield

01 August 2024 11:41am BST

Just Stop Oil protesters have been removed from Heathrow airport following another failed protest.

Several activists sat or stood by the gates to departures in Terminal Five before some were physically removed by police.

It followed several other damp squib demonstrations at airports this week.

On Monday, holidaymakers at Gatwick stepped over activists who had attempted to block security gates, while on Tuesday two Just Stop Oil members reportedly sprayed information boards, windows and the floor at Heathrow Terminal Five's departures area with orange paint.

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A Heathrow spokesman said: "Earlier this morning, a protest incident in Terminal Five was swiftly resolved, and all involved were immediately removed from the airport.

"Our priority will always be to maintain the safety of passengers and colleagues, and we'll continue to work closely with our partners and the police in taking proportionate action to protect travel plans this summer. Unlawful and irresponsible protest activity is not the way forward, and will not be tolerated."



X / Just Stop Oil

The Telegraph understands that Thursday's Heathrow protesters did not daub orange paint on anything and did not glue themselves to the floor or any other structures.

Just Stop Oil, which is calling on the Government to establish a "fossil fuel treaty", vowed last week to use "all means necessary" to disrupt summer holidays.

A Metropolitan Police spokesman said: "At 08:48hrs on Thursday, Aug 1, officers at Heathrow airport became aware of protesters blocking a security lane at Terminal Five.

"Seven protesters were arrested on suspicion of interfering with key national infrastructure contrary to Section Seven of the Public Order Act 2023. They were taken to a west London police station, where they remain at this time. The incident was complete at 09:08hrs. Enquiries are ongoing."



Some of the activists were physically removed by police Credit: Tom Bowles



Credit: Tom Bowles

Just Stop Oil claimed two of the seven people arrested on Thursday were septuagenarians.

Di Bligh, 77, a former chief executive of Reading Borough council, and Ruth Cook, a 72-year-old from Somerset, were both said by the group to have been arrested by police.

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In a prepared statement, Ms Bligh said: “Electric cars and windfarms won’t do it – governments must act together before we reach more tipping points into chaos than we can prevent.

“We need our political leaders to act now, by working with other nations to establish a legally binding treaty to stop the extraction and burning of oil, gas and coal by 2030.”



Just Stop Oil protesters hold placards in front of the Terminal Five departure gates Credit: Guy Smallman/Getty Images

In a statement issued by Just Stop Oil, Ms Cook said: “I am here for my two grandchildren, my two grandnieces who have just come into this world, and for all children – what future will they face?

“I want to be able to look them in the eye and tell them that I did all that I could.”

The protest group claimed a total of 17 people had been arrested on Thursday morning, including 10 detained on public transport, six blocking travellers and one person filming the protesters.

It came the day after two of Just Stop Oil’s number were jailed for breaking their bail conditions. Phoebe Plummer, 22, and Jane Touil, 58, were remanded in custody on Wednesday after targeting Terminal Five in a similar protest on Tuesday.

Gareth Corfield
01 August 2024 11:41am BST

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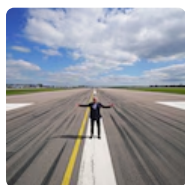
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Five Just Stop Oil activists remanded in prison in connection with plot to disrupt passengers at Manchester Airport

By [DAN WOODLAND](#)
PUBLISHED: 22:09, 6 August 2024 | UPDATED: 03:51, 7 August 2024

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Five **Just Stop Oil** supporters have been remanded to prison after being arrested near **Manchester Airport** earlier this week.

Daniel Knorr, 22, Margaret Reid, 53, Ella Ward, 21, Noah Crane, 19, and Indigo Rumbelow, 30, were arrested on Monday in connection with a plot to disrupt passengers at Manchester Airport.

They were found to be in possession of items that Greater **Manchester Police** believed would have been used to 'cause damage and significant disruption to the airport and its operations', the force said.

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The quintet today appeared at Manchester Magistrates' Court charged with intentionally or recklessly causing public nuisance.

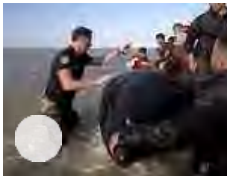


The five protesters were all remanded until at least their next appearance on September 10.



(Left to right) Indigo Rumbelow, 30, Margaret Reid, 53, Ella Ward, 21, Noah Crane, 19, and Daniel Knorr, 22, were arrested on Monday near Manchester Airport

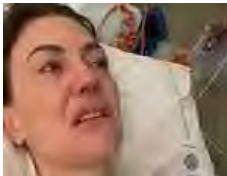
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School uniforms that





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Noah Crane, 18, was also arrested later in the day from an address in Birmingham

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Four Just Stop Oil protesters have been arrested near Manchester Airport (pictured) in a police swoop

Ella, Daniel, Indigo and Margaret were all arrested in the early hours of yesterday morning near Manchester Airport, Just Stop Oil said.

Noah was arrested later in the day from an address in Birmingham, after police seized a phone he allegedly purchased on August 3, the group added.

Activists from the environmental group have seen their attempts in recent weeks to unleash a 'summer of chaos' at airports across Europe foiled by officers.

They have been targeting airports in recent weeks in the campaign named 'Oil Kills'. Just Stop Oil said 21 groups across 12 countries have taken action at 21 airports so far.

Speaking before her imprisonment Indigo Rumbelow, 30, from Swansea, said: 'Just Stop Oil supporters have been taking part in an International Uprising for a Fossil Fuel Treaty, because we have an international crisis and we need an international solution. We're in a world and our leaders are hell-bent on making it worse.'

'The climate crisis threatens everything we know and love, yet our scientists are continuing to make the problem worse, the courts are protecting the status quo and imprisoning those who stand-up to make change, whilst the media is grappling to tell the truth.'

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Pictured: Grinning JSO protesters arrested near Manchester Airport as police slam eco-idiot



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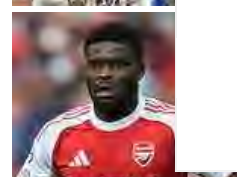
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AUGUST 1: Just Stop Oil protesters block the security screening area at Heathrow Terminal Five



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AUGUST 1: Just Stop Oil protesters hold 'Oil Kills' signs as they block the security gates



AUGUST 1: Police officers remove a Just Stop Oil protester at London Heathrow Airport

'Many of my friends have been sent to prison, but we will not be deterred. Nothing will stop us trying to protect our families and our communities from the danger imposed on all of us through continued oil, gas and coal burning.'

Daniel Knorr, 22, from Oxford said: 'We were not born to stand-by and do nothing whilst hundreds of millions of lives are thrown into the furnace.'

'To be human is to care. This is terrifying but we need to be brave. Courage is not the absence of fear, it is to drive forwards towards what's right, despite your fear.'

'We stand to lose everything if our government continues to fuel the climate crisis. It would be completely self-defeating to not be in resistance at this time in history.'

'Our leaders must enact a Fossil Fuel Treaty to phase down oil and gas if we are to stand any hope.'

Noah Crane, 19, from Norwich said: 'When I think about the situation we're in,

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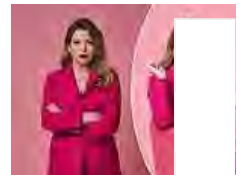
Just Stop Oil eco zealots are dragged away by police after trying to block Heathrow depart

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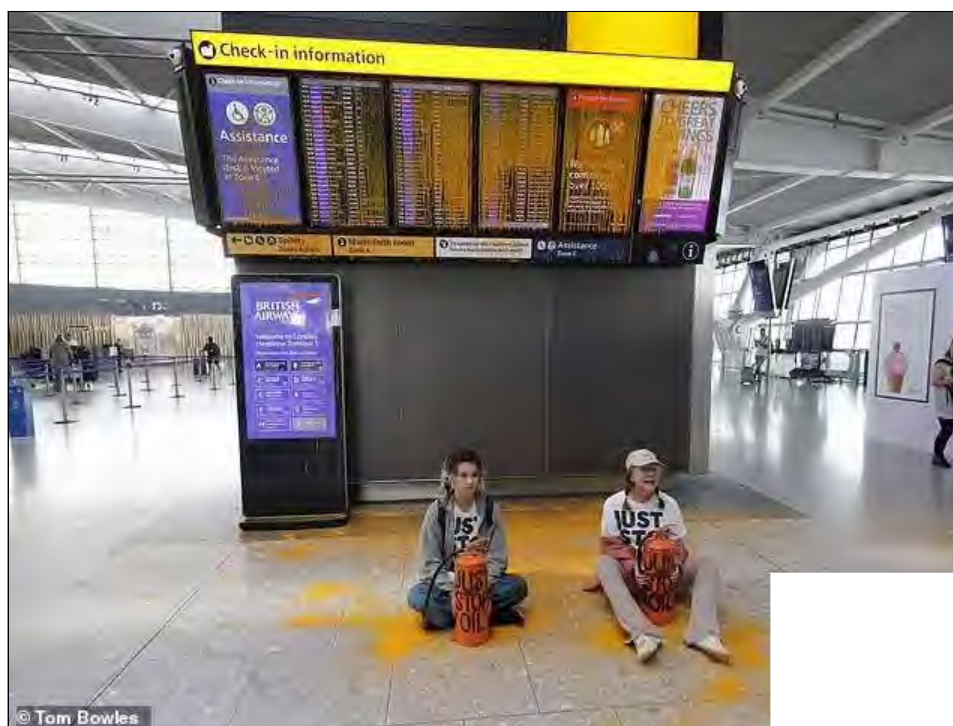
I realise we are faced with a choice; we can either sit back and watch as governments allow the deaths of hundreds of millions of people to protect profit, or we can do everything in our power to prevent that. When I think about it that way, it's really a no-brainer.'

'I'm not scared of going to prison. What I am scared of is what will happen if we don't act on this crisis. The world is in a position where there is no threat they can make towards me, that outweighs the consequences of inaction.'

JSO eco-morons strike Heathrow as part of 'summer chaos crusade'



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JULY 30: Phoebe Plummer is arrested on suspicion of criminal damage at Heathrow Airport

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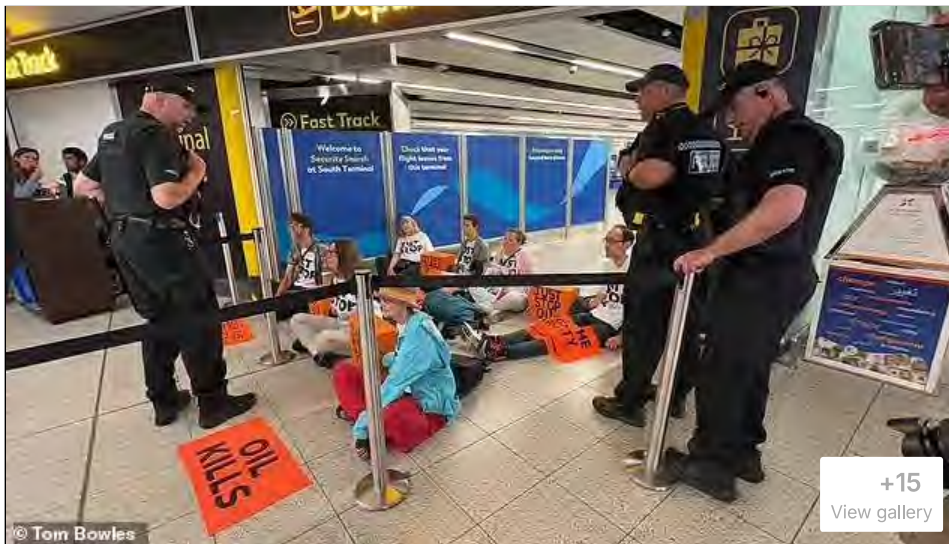




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JULY 30: Phoebe Plummer is removed by police at Heathrow after the group's latest stunt



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JULY 29: Just Stop Oil supporters block departure gates at Gatwick Airport in another protest



© Tom Bowles

JULY 29: The seven Just Stop Oil protesters at Gatwick earlier this week were

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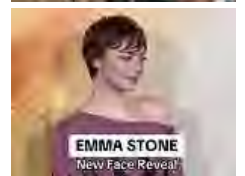


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'F*** off!': Passengers step over eco-mob blocking Gatwick departures

▶

Watch the full video

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A Just Stop Oil spokesperson 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.'

Last week, a group of six demonstrators tried to block the security screening zone at London Heathrow's Terminal Five.

They sat or stood holding signs saying 'oil kills' and 'sign the treaty' in front of the barriers to enter the area for departing passengers - but they were dragged away by police officers.

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Protestors blockade Farnborough airport over private jet expansion plans

MERIDIAN

FARNBOROUGH

🕒 Sunday 2 February 2025 at 2:12pm



Local residents joined climate activists to block the airport's main entrance

Credit: Extinction Rebellion

Local residents and climate activists have blocked access to Farnborough Airport to protest against the proposed expansion of the airport which they say will almost double the number of private jet flights to 70,000 a year.

Scores of campaigners from Extinction Rebellion, Farnborough Noise campaign group, Blackwater Valley Friends of the Earth and Alton Climate Action Network joined local councillors and local residents, to voice their opposition to the plans, which they say blatantly ignore the climate crisis.

The protest follows a consultation period on Farnborough Airport's expansion plans which ended in October 2024 drawing fierce opposition from local residents and environmental campaigners.

[Greta Thunberg joins protest against airport expansion plans](#) >

The proposals include doubling the airport's annual weekend flight limit from 8,900 to 18,900 flights and upping its annual flight limit from 50,000 to 70,000 flights.

Rushmoor Borough Council has yet to make a decision on the proposed increase.



Credit: Extinction Rebellion

In a statement, Extinction Rebellion said that the 33,120 private jet flights to and from the airport in 2024 carried an average of 2.5 passengers, with each passenger responsible for the emission of nine times as much carbon as an economy flight to the US and 20 times that to Spain.

"For the limited benefit it provides to a small number of people, private aviation has a disproportionately large impact on climate change due to its high carbon emissions," it said.

"Per passenger mile, flying in a private jet is the most inefficient and most carbon-intensive mode of transport. It

epitomises the worst of climate injustice, where a few people emit large amounts of carbon for the sake of a journey that can be taken by a scheduled flight or, in many cases, by train.



*Waverley Borough councillors joined protestors outside the airport
Credit: Extinction Rebellion*

Steve Williams, Environment Portfolio Holder for Waverley Borough Council, says “aviation has no realistic prospect of becoming sustainable in the near future, so any form of airport expansion is unacceptable, given the climate crisis.

Expansion at Farnborough is particularly iniquitous because of the impact on the locality nearby and the massive carbon footprint of the privileged few who choose to travel by private jet.”

The protest comes after the Government announced plans to boost UK economic growth through airport expansion and the use of sustainable air fuel.

Campaigners fear the potential use of the 2nd runway at Gatwick will adversely affect the locality, as will the building of a third runway at Heathrow airport.

A spokesman for Farnborough Airport has previously addressed the concerns : “Farnborough Airport is an important gateway for business aviation connectivity with the majority of flights being operated for business and corporate travel purposes.

“The airport’s environmental footprint is a fraction that of a traditional commercial airport, yet it serves as one of the largest employment sites in the region.

Activists hold demonstration at Scots airport over private jet company

Billionaire Anders Povlsen's firm targeted over environmental hypocrisy

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By **Ryan McDougall** & **Peter A Walker** Content Editor 08:15, 17 FEB 2025

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 **Activists at Inverness Airport on Saturday** (Image: XR Scotland)

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Extinction Rebellion Scotland held a demonstration at Inverness Airport on Saturday, calling out Blackbird Air's chief executive Anders Povlsen, who protesters say uses private jets frequently, while making commitments to nature conservation.

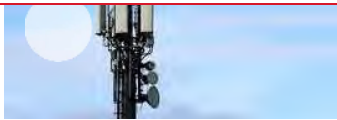
Protesters waved banners emblazoned with "Ban Private Jets", "Blackbird Nae mAir" and "We're in a climate emergency, we need to step up and take action".

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They called upon Povlsen to shut down Blackbird Air and instead invest in environmentally-friendly transportation.

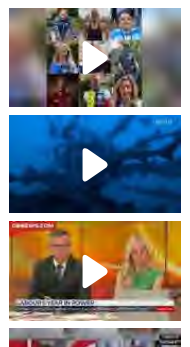
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The protesters joined fellow activists from Scientist Rebellion in Denmark, who staged a similar demonstration at Blackbird headquarters at Billund Airport.



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Povlsen - [Scotland's richest person](#) - owns a vast amount of land in Scotland and also operates Wildland, a private enterprise which aims to act upon the climate crisis.

Sarah Birkby, from Extinction Rebellion Highlands and Islands and Moray, said: "It is completely contradictory to state the importance of acting on the climate emergency and at the same time run a private jet company."

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"The time when people, no matter how rich, could say one thing and do the exact opposite is over.

"As Wildland itself declares, we need people to step up and take action."

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Anthony Graham, from Scientists for Extinction Rebellion, added: "The evidence is clear: our current emissions pathway is incompatible with a safe planet.

"Every tonne of CO2 fuels climate change, yet private jets - used by the wealthiest 0.003% - emit disproportionate amounts, worsening both the climate crisis and inequality.

"Scientists for Extinction Rebellion urge action on luxury emissions, stressing that those with the most power must lead by example."

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Four arrested after RAF Brize Norton break-in



Ewan Somerville

BBC News

27 June 2025

Counter-terror police have arrested four people after military planes were sprayed with paint during a break-in at RAF Brize Norton that was claimed by a pro-Palestinian group.

Footage posted online last Friday by Palestine Action showed two people inside the Oxfordshire airbase in darkness, with one riding on a scooter up to an Airbus Voyager and spraying paint into its jet engine.

South East counter terrorism police have now arrested a 29-year-old woman of no fixed abode and two men, aged 36 and 24, both from London, on terror charges.

A 41-year-old woman, of no fixed abode, was arrested on suspicion of assisting an offender.

The suspects aged 24, 29 and 36 are suspected of "the commission, preparation or instigation of acts of terrorism, contrary to Section 41 of the Terrorism Act 2000", police said.

The arrests took place in Newbury, Berkshire, and all suspects remain in custody.

South East counter-terror police gave no further details about the individuals arrested, nor their suspected link to the incident.

The government has said it will proscribe Palestine Action following the incident at Brize Norton, making it illegal to be a member or invite support for the group.

Home Secretary Yvette Cooper said a draft proscription order would be laid before Parliament on 30 June.

Palestine Action said its activists were able to evade security and claimed they had put two air-to-air refuelling tankers "out of service".

The group said activists used repurposed fire extinguishers to spray the paint and caused "further damage" using crowbars.

However, Downing Street said the incident had not blocked any planned aircraft movements or stopped any operations.

The base is encircled by a large perimeter fence, with security cameras and sensors in the area in addition to manned security checkpoints. Patrols around the base are also carried out from time to time.

But a defence source said these measures would not have been able to provide complete cover around the large airbase.

Defence Secretary John Healey said he was "really disturbed" by the incident and ordered a wider security review of all UK military bases.

Prime Minister Sir Keir Starmer condemned the break-in as "disgraceful", characterising it as an "act of vandalism".

RAF Brize Norton serves as the hub for UK strategic air transport and refuelling, including flights to RAF Akrotiri in Cyprus.

The air force has conducted reconnaissance flights over Gaza out of the Cyprus base, though the Ministry of Defence told the BBC that RAF Voyager aircraft had not been involved in refuelling or supporting Israeli Air Force jets.

A Palestine Action spokesperson said in a statement shortly after the break-in: "Despite publicly condemning the Israeli government, Britain continues to send military cargo, fly spy planes over Gaza and refuel US and Israeli fighter jets."

Police said the incident took place in the early hours of 20 June and that "damage was caused to two aircraft".

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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

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

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.



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OPINION

'The police must crack down on Just Stop Oil's plans to make a comeback,' says Ben Leo



Ben Leo reveals Just Stop Oil are at it again | GB NEWS

By [Ben Leo](#)

Published: 18/05/2025 - 17:47

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OPINION: Ben Leo revealed that Just Stop Oil are making a comeback

Now, I was getting pretty bored of the juvenile antics at the altar of climate change.

We've seen it all vandals throwing soup over priceless artworks in galleries, defacing Stonehenge, ambushing theatre productions in the West End, blocking traffic, scaling motorway gantries, dousing private jets in paint, and even disrupting sports events all just to spoil the fun for everyone else.

Remember them? They said they were disbanding after the government appeared to adopt their demand to end new oil and gas licences in Britain. Their actions, of course, cost the public tens of millions in police and court time.

But despite Ed Miliband bowing to their demands, I can exclusively reveal that Just Stop Oil is plotting a very big comeback.

Ben Leo said: "I can exclusively reveal that Just Stop Oil is plotting a very big comeback." | GB NEWS

On Ben Leo Tonight, we have gained access to secret Just Stop Oil meetings, where members are discussing a dramatic U-turn—planning to cause chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and even carrying out “citizens’ arrests” on so-called climate criminals.

Speaking during an online meeting on Thursday night, one coordinator—known only as “Dave”—said protests should remain “action-based” and warned against becoming more peaceful, like Greenpeace.

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- **Just Stop Oil activist declares ‘we WILL be back’ as tense row breaks out on GB News**

The meeting continued with Dave insisting that it was essential to keep doing what he called the “spicy and naughty stuff” to generate media attention.

The group also discussed how to feed new protest ideas back to what they referred to as a "core team". There was frustration over communication with this mysterious leadership group, with some suggesting using 50-word briefs to make it easier for them to process ideas.

It raises serious questions: Who exactly is this core team? Who are these professional protesters reporting to—and who’s funding them?

Chillingly, the group also spoke about carrying out citizen’s arrests on so-called climate deniers. There was some introspection as well, with members questioning whether their public image was doing more harm than good.

But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to proceed with Just Stop Oil's revival, including talk of keeping protesters in safe houses to maintain morale.

Let's be clear: what we're dealing with here is a group of climate zealots plotting to commit criminal acts, backed by who knows what kind of funding, and being housed like some kind of eco-mafia.

And speaking of coordination—let's not pretend the climate agenda is a spontaneous grassroots movement. It's organised. It's funded. It's political.

So, who's paying to bus these protesters from London to Stonehenge, to airports, to art galleries and sports stadiums? Who's funding the Just Stop Oil safe houses where these scruffy, self-righteous agitators meticulously plan how to make Britain colder and poorer?

The police and the government must crack down on Just Stop Oil's plans for criminality before they gain traction again.

The last thing Britain needs is more disruption, more vandalism, and more self-indulgent eco-activism especially when a Labour government is already happily marching to the drumbeat of Net Zero extremism.

We'll be passing our findings to the police.

GB News has approached Just Stop Oil for a comment.

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More From GB News

Payne, Emma

From: Payne, Emma
Sent: 02 June 2025 14:08
To: Payne, Emma
Subject: FW: Exposed by GB News

Importance: High

From: Just Stop Oil <info@juststopoil.org>
Sent: 21 May 2025 19:29
To: Wortley, Stuart <StuartWortley@eversheds-sutherland.com>
Subject: Exposed by GB News



Dear Stuart,

GB News was right for once. We are ["plotting a very big comeback"](#).

While we have stopped taking action as Just Stop Oil after winning our initial demand, we also know that revolutionary change is needed now more than ever. In the three years since Just Stop Oil began in 2022, the necessity to resist has become impossible to ignore.

We've seen the world's billionaires accumulate \$3.7 trillion in wealth, making them now richer than almost every country in the world. Over 50,000 Palestinians have been killed in the ongoing genocide in Gaza, a genocide that is still bankrolled and armed by our own government. At least 166,000 people are being killed due to government inaction on the climate crisis every year with a recent report estimating 4 billion total deaths if we don't take urgent action. The UK is facing a cost of living crisis that doesn't seem to have an end in sight. We've passed the 1.5 C global heating threshold that was internationally agreed upon to limit heating to in the 2015 Paris Agreement. And as the cherry on top of this pile of shit, our rights to dissent to this, to protest in this country are being steadily infringed upon with new laws and powers being introduced to criminalise protest and unprecedented prison sentences being handed out to nonviolent protestors.

It's clear that our government could not care less about ordinary people. Corrupt politicians are serving the interests of billionaires while the media is shifting blame from their mates on mega yachts to the people in small boats all while the world gets hotter and hotter.

Nothing short of a political and economic revolution is going to get us out of this mess. Just Stop Oil was just the beginning. A new campaign is in the works--one that will build on our knowledge and success as Just Stop Oil and will face the grinding injustice of our political and economic system head on. **We're just getting started. You're here at ground zero of the revolution and we need your support to get it off the ground. Can you donate to make it happen?**

[Donate to help build the revolution](#)

We run entirely off of donations and while the street campaign is over, there's still a lot of work to be done. Donations go towards building the next campaign and ensuring it's up to the task of challenging the system AND to supporting the hundreds of brave people who are still being dragged through the courts with fines, prison time, electronic tags, and isolating curfews.



Do you also want to get involved in a more practical way in building the revolution? Interested in learning the skills needed to organize and build resilient communities and movements? Curious about theories of change and nonviolent resistance? Join us on Saturday 14th and Sunday 15th of June in London as we join forces with Youth Demand for the launch of the Seeds of Revolution training programme. Everyone is welcome, old and young, seasoned veterans and fresh faces. We want to meet you!

William Sitwell

Just Stop Oil 2.0 is already here – and frothing at the mouth to destroy our summer

From the soon-to-be defunct protest group's ashes rises Youth Demand, a new group of unwashed activists intent on crippling the capital



 298

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Youth Demand is plotting daily co-ordinated actions, with plans to 'shut down London with swarming road-blocks day after day' Credit: Henry Nicholls/AFP via Getty Images



William Sitwell

04 April 2025 4:00pm BST

Follow

Officials and security guards at art galleries, snooker halls and sports pitches have been breathing sighs of relief since the news came a few days ago. Just Stop Oil, one's go-to protest group on climate change, announced it is disbanding at the end of this month.

“Three years after bursting on the scene in a blaze of orange, at the end of April the Just Stop Oil campaign will be hanging up the hi-vis,” said JSO activist Hannah Hunt, while standing by the gates of Downing Street. Note: she's not the boss, not the leader, co-chair nor head, that would be too much of a nod to the destructive – historically male – structures of colonially-rooted capitalism.

She added: “Just Stop Oil's demand to end new oil and gas is now government policy, making us one of the most successful civil-resistance campaigns in recent history.” Indeed, with their very own geeky mole deep in the heart of the Labour government doing all their nutty net-zero-fantasy bidding (or Ed Milliband to you and I), they can now glue the cracks in the walls of their squats rather than themselves to the tarmac.

So, does that mean no more soup slung at ‘Sunflowers’, no orange paint lobbed over the sarsens at Stonehenge and no streaking amid a cloud of orange dust at Lord’s?

Well, I’m afraid not. As the spring sun draws out the daffodils, the prospect of a beautiful, long summer of disruption is too hard to resist for your good old-fashioned activist.

For from the ashes of Just Stop Oil rises a new phoenix of righteous fury: Youth Demand. And, surprise, surprise, it’s a group clad in orange, many of them JSO alumni. People such as Chiara Sarti who, in Oct 2023, came of age by spraying the neo-Gothic gatehouse of King’s College Cambridge with orange paint; and Edred Whittingham who, in April 2023, leapt onto a snooker table in Sheffield’s Crucible Theatre and covered it with orange powder. (Although he did, admittedly, bring some much-needed colour to a rather lacklustre match between Robert Milkins and Joe Perry.)

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To encourage folk to join their merry dance, they are branding themselves as a veritable Just Stop Oil 2.0, as glittering and tempting as an iPhone upgrade; joining together those two couture lines of protest: pro-Palestine and anti-fossil fuel.

“Young people are resisting,” they declare on their new website, conveniently forgetting to add the words “going to work”.

And then there’s lots of frightfully cross stuff. In fact, they give Dave Spart, that parody of a left-wing agitator in *Private Eye*, a run for his money. “The government is engaging in absolute evil... they are enabling genocide... contributing to the murder of billions to keep the fossil fuel profits flowing.”



Youth Demand has staged several protests across the capital in support of Palestine Credit: Guy Smallman/Getty Images

Then they make a few impossible demands for the “rigged political system” to “stop all trade with Israel...[and] raise £1 trillion by 2030 from the super-rich and the fossil-fuel elite”. The beauty of these loony demands being that as there is no conceivable chance of them being met (although when you next encounter a member of the fossil-fuel elite, by all means put it to them) they can feasibly demonstrate into eternity.

For, let’s face it, nothing riles the unwashed, pipe-playing activist more than being told their demands have been met. They’d have to pack up their nuts and retreat to their eco-shelters. Or rather, return to their cosy middle-class homes for a bath and nice TV supper with Mum and Dad.

So, when the hardcore members heard that JSO was winding up, they were having none of it. It’s not a proper English summer without some juicy non-violent resistance and so plans are afoot. There are meetings and Zoom calls scheduled – and they’ve already secured an early PR hit.

In March, six female members of Youth Demand were arrested by police inside a Quaker House in Westminster. It was fabulously heavy-handed, with more than 20 uniformed police storming in, breaking down doors and brandishing tasers.

Apparently there was a life-drawing class ensuing in an adjoining room, goose-pimples, perhaps, sprouting on the naked model at the unwelcome gust of fresh air. An elderly lady, we're told, was in a lavatory at the time.

The story was spun as an authoritarian attack on free speech. Colum Hayward, a member of a non-Quaker spiritual group who often attends the building, likened the raid to a burglary. The place's "personal space," he wrote, "has been invaded". He added: "places of real quiet and sanctuary are deeply needed in our society."

Indeed they are, but what is Youth Demand plotting in such buildings and online? Daily co-ordinated actions, with plans to "shut down London with swarming road-blocks day after day." And, doubtless, a lot more. Think the usual soft targets of art galleries and sports venues. Yes, the very same places that offer "real quiet and sanctuary".

For some, that sanctuary lies in the snooker hall, a diverting contest between two artists of the cue and cloth. For others, it's a quiet road in London on a sunny Sunday afternoon.

Yet this mob, with its fetish for protest and banging drums, frothing at the mouth and countenancing no reasoned argument; no nod, even, to actual reality (the sovereignty of a democratic country, the right to a warm home and hot water, for example), plan to disrupt and harass. And all the while not touching the, albeit phantom, "fossil-fuel elite". But they will, for sure, annoy the living hell out of everyday folk going about their lives.

So, I say, raid the Quaker Houses, infiltrate, shut down their phones, harangue and harass these pests and give Youth Demand a nice dose of what I like to call 'grown-up protest'.

MORE FROM WILLIAM

Pity the vegans when the moral high ground starts getting crowded

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A Summer of Action

June 19, 2025 by Extinction Rebellion

While politicians supported airport expansions, degraded our environmental laws and parliament tightened its chokehold on climate activists, global average temperatures in 2024 blew past 1.5°C. Now the UK has recorded its warmest spring on record and its driest in over **50 years**.

Rebels are refusing to be silenced. XR local and community groups all over the nations and regions of the UK are getting ready for a summer filled with defiant action. Creative, colourful, bold actions are being planned everywhere – join them, raise your voice in

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Check out the [movement calendar](#) and [map](#) to find actions near you this summer, and see below for some highlights!

Insure Our Survival – Without insurance, fossil fuel companies can't extract more oil, coal and gas. A [Week of Action](#) from **5th-12th July** – targeting insurers takes place with local groups across the UK planning actions.

Stop Private Jets – Join XR **Oxford on Saturday July 5th** in a march to Oxford Airport and say No to Private Jets. [Find out more](#).

Heat Strike – A week of action **14th-20th July** to highlight rising temperatures' impact on workers, as we pressure government and employers to take action. [Learn more and get involved](#).

Funeral for Nature – Dress in black for a [solemn march](#) through **Bournemouth** on **Sunday July 27th**. This visual action mourning the destruction of nature will be silent apart from a drumbeat.

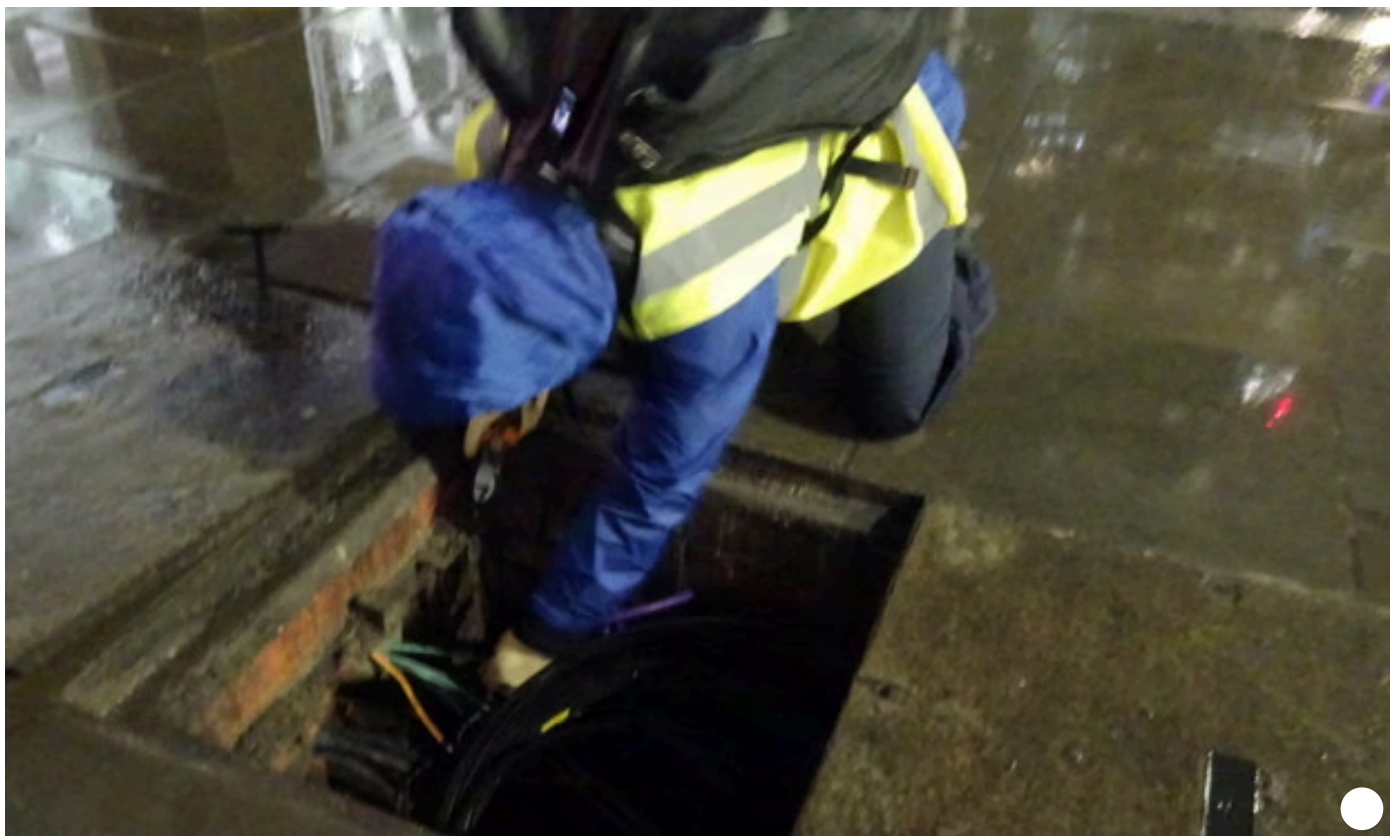
Don't Pay for Dirty Water – Last year, sewage was discharged into UK waterways over 1,000 times a day. We are withholding payment of the sewerage charge portion of our bills until the UK government and water companies stop poisoning and start cleaning up coasts and waterways across the UK. [Join the boycott now!](#)

World Water Wedding – Water is sacred in many cultures. Water is fundamental to life. Wherever clean water flows, life grows. Water represents emotions, renewal and life, which all ebb and flow. Constantly evolving, ebbing and flowing, it reminds us that we can too. [Commit to water for life on August 24th](#).

For advice on the latest safety, legal and action support information, please join one of our online [Prepare for Action workshops](#), upcoming on **26th June and 1st July**.

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UK news

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Man arrested after climate activists cut UK insurance firms' fibre optic cables

Protest group says it targeted insurers 'due to their critical role underpinning the fossil fuel economy'

Damien Gayle

Fri 24 Jan 2025 17:36 GMT

A man has been arrested after environmental activists claimed responsibility for sabotage attacks on fibre optic cables outside major insurance companies.

The 29-year-old was arrested by City of London police after activists said they had cut the cables to insurance company offices in London, Leeds, Birmingham and Sheffield on Monday.

In a press release, the group, which calls itself Shut the System, said it had targeted insurers "due to their critical role underpinning the fossil fuel economy through underwriting contracts and investments".

It circulated a photo it said showed an activist dressed as an electrical engineer reaching into a maintenance hole to cut cables next to 52 Lime Street, in the City of London financial district, where the insurance firms W/R/B Underwriting and Chaucer have offices.

Fibre optics were also targeted, according to the press release, at the insurance market at Lloyd's of London, the Walkie Talkie building at 20 Fenchurch Street, which is the London base of seven big insurers, as well as the offices of Talbot AIG at 60 Threadneedle Street, Chubb at 100 Leadenhall Street, and AIG on Fenchurch Street. The offices of AIG in Birmingham, Markel in Sheffield and Axa in Leeds were also targeted, Shut the System said.

"If these powerful companies don't make public statements that they will stop driving fossil fuel expansion and destroying life on Earth, then we have no choice but to stop them ourselves," the group's statement said. "We will not give up until insurance companies take responsible action."

Lloyd's of London did not respond to a request for comment, and the City of London police were understood to still be investigating which companies in its area had been affected.

Matthew Geyman, the managing director of Intersys, a cybersecurity company with offices in the City, said there had been "significant slowdown of internet speed" in the area around the time the action took place, but the network continued to function.

"There doesn't seem to have been as much impact as I suspect the protesters hoped," Geyman said. "This is likely because robust communication systems are designed to be resilient to these attacks."

“We noticed a significant slowdown of internet speed in the City of London at the time it happened, which suggested high contention (ie some communications links were becoming saturated or stretched as they took excess load from the damaged lines) but, beyond this, I’ve heard of very little disruption from contacts.”

Resilience to such incidents was built into the system, with redundant lines able to be used and automatic switching to backup routes, including radio and cellular links, which “happen almost instantaneously”, Geyman said. Roadworks taking place outside Lloyd’s on Thursday were “presumably to remedy the physical damage”, he added.

Shut the System emerged last year with a series of actions smashing and hurling red paint across windows at City-based insurers and more than 20 branches of Barclays Bank. At the beginning of this year it announced it had sabotaged fibre optic cables outside 55 Tufton Street, the centre of a network of rightwing lobby groups and thinktanks.

Unlike groups such as Extinction Rebellion and Just Stop Oil, whose activists commit civil disobedience and wait to be arrested, the group’s supporters act clandestinely, leaving before police arrive. On a WordPress website set up in the group’s name, a statement says the group believes it has “kickstarted a new phase of the climate activist movement” with a “campaign of sabotage targeting the tools, property and machinery of those most responsible for global warming”.

DCI Kevin Ives, head of the criminal investigation department and volume crime unit at City of London police, said: “A 29-year-old man has been arrested on suspicion of criminal damage, following reports of external cabling being damaged under the City of London on Monday 20 January.

“The man has been bailed with conditions, pending further police investigations.”

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Dear all,

In accordance with the Order of The Honourable Mrs Justice Farbey dated 14th August 2024:

The **Annual Injunction Review Hearing** in this matter has been listed for **22nd October 2025** for **1 ½ hours** before a High Court Judge, in person.

The Judge and start time of the hearing will be confirmed on the working day before on the Daily Cause List.

Please forward on a copy of this listing notice to all interested parties.

Kind regards



Subash Vasudevan

Judges Listing Office Team Leader

8x8 Contact Centre Supervisor

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Ahmed El-Atrash

From: Phil Spencer
Sent: 05 August 2025 20:32
To: 'juststopoil@protonmail.com'; 'juststopoilpress@protonmail.com';
'info@juststopoil.org'
Subject: RE: NOTICE AND SERVICE OF HIGH COURT INJUNCTION AT LONDON SOUTHEND
AIRPORT (Claim Number KB-2024-002596) [_BCLP-LEGAL.3014634.000001]

HIGH COURT CLAIM NUMBER: KB-2024-002596

(1) LONDON SOUTHEND AIRPORT COMPANY LIMITED, (2) LONDON SOUTHEND SOLAR LIMITED, (3) THAMES GATEWAY AIRPORT LIMITED v PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHEND AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE AMENDED PARTICULARS OF CLAIM

As you are aware, by an Order of Mrs Justice Farbey dated 14 August 2024, the Claimants were granted an injunction against the Defendants (the "**Injunction**"). We continue to act for the Claimants.

In accordance with paragraph 3 of the Injunction, the first annual review hearing has been listed for: **22 October 2025, for 1.5 hours before a High Court Judge, in person.**

The Judge and time of the hearing will be confirmed the working day before on the Daily Cause List. At the time of writing, the relevant web page to access the King's Bench Daily Cause List is: <https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=109>

Further documents in relation to the hearing will be made available on <https://londonsouthendairport.com/corporate/injunction/> in due course.

Yours faithfully

Bryan Cave Leighton Paisner LLP



Phil Spencer
Senior Associate
Bryan Cave Leighton Paisner LLP - London, UK
phil.spencer@bcplaw.com
T: +44 20 3400 3119 M: +44 7738 037271

From: Phil Spencer
Sent: 19 August 2024 17:43
To: 'juststopoil@protonmail.com' <juststopoil@protonmail.com>; 'juststopoilpress@protonmail.com' <juststopoilpress@protonmail.com>; 'info@juststopoil.org' <info@juststopoil.org>
Subject: NOTICE AND SERVICE OF HIGH COURT INJUNCTION AT LONDON SOUTHEND AIRPORT (Claim Number KB-2024-002596) [_BCLP-LEGAL.3014634.000001]

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Please take note that a Claim (KB-2024-002596) has been brought, and an application made, in the High Court in relation to the above. The documents relating to this Claim (including the Amended Claim Form, Amended Particulars of Claim, Application Notice, evidence in support and a Note of the Hearing on 14 August 2024) are available at: <https://londonsouthendairport.com/corporate/injunction/>.

A copy of the Order granted is attached to this email.

Yours faithfully

Bryan Cave Leighton Paisner LLP



Phil Spencer
Senior Associate
phil.spencer@bclplaw.com
T: +44 20 3400 3119 M: +44 7738 037271

Bryan Cave Leighton Paisner LLP
Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, United Kingdom

bclplaw.com

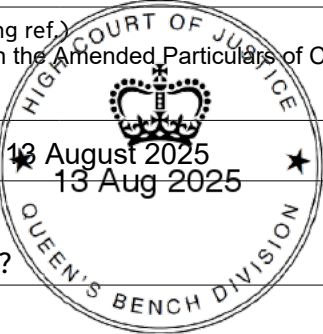
N244

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>

Name of court High Court of Justice (KBD)		Claim no. KB-2024-002596	
Fee account no. (if applicable) PBA0076972		Help with Fees – Ref. no. (if applicable) HWF- - - - -	
Warrant no. (if applicable)			
Claimant’s name (including ref.) (1) London Southend Airport Company Limited, (2) London Southend Solar Limited, (3) Thames Gateway Airport Limited			
Defendant’s name (including ref.) Persons Unknown as defined in the Amended Particulars of Claim			
Date		13 August 2025 13 Aug 2025	



1. What is your name or, if you are a legal representative, the name of your firm?
Bryan Cave Leighton Paisner LLP
KB-2024-002596

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

Sub Event ID: 10

If you are a legal representative whom do you represent?
Claimants

3. What order are you asking the court to make and why?
An order to continue the injunction granted by the Order of Farbey J dated 14 August 2024. Please see further information in box 10 below.

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?
1 Hours 30 Minutes
Is this time estimate agreed by all parties? ☐ Yes ☒ No

7. Give details of any fixed trial date or period
22 October 2025

8. What level of Judge does your hearing need?
High Court Judge

9. Who should be served with this application?
N/A (see box 9a below)

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.
The Claimants will serve pursuant to the requirements set out at paragraph 9 of the Order of Farbey J dated 14 August 2024.

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.

Paragraph 3 of the Order of Farbey J dated 14 August 2024 (the "Order") requires that an annual review hearing be arranged. On 11 March 2025, the Claimants wrote to the Court to request such hearing be listed in accordance with the Order. A hearing was duly listed for 22 October 2025, in person before a High Court Judge, for a time of 1.5 hours.

Paragraph 3 of the Order also refers, at the end, to the Claimants having "applied" for the review hearing. In the event that this should be interpreted as the Claimants having made a formal application on form N244, the Claimants are therefore doing this (despite the hearing already being listed) for the sake of good order.

The Claimants respectfully request a sealed copy of the this application notice, and that the existing hearing be preserved.

Directions on further evidence and filing deadlines have already been set in paragraph 3 of the Order, and the Claimants intend to follow those in due course.

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
13	08	2025

Full name

Philip Keith Spencer

Name of applicant’s legal representative’s firm

Bryan Cave Leighton Paisner LLP

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

Senior Associate

Applicant’s address to which documents should be sent.

Building and street

Governor's House, 5 Laurence Pountney Hill

Second line of address

Town or city

London

County (optional)

Postcode

E	C	4	R	0	B	R
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If applicable

Phone number

Fax phone number

DX number

Your Ref.

AMRK/PSPE/3014634.1

Email

phil.spencer@bclplaw.com

Ahmed El-Atrash

From: Phil Spencer
Sent: 20 August 2025 11:45
To: 'juststopoil@protonmail.com'; 'juststopoilpress@protonmail.com';
'info@juststopoil.org'
Subject: RE: NOTICE AND SERVICE OF HIGH COURT INJUNCTION AT LONDON SOUTHEND
AIRPORT (Claim Number KB-2024-002596) [BCLP-LEGAL.3014634.000001]

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Further to the below, and by way of service, we confirm that a sealed copy of the application which has been made in relation to the first annual review hearing is now available at <https://londonouthendairport.com/corporate/injunction/>. Also as below, further documents in relation to the hearing will be made available at the same address in due course.

Yours faithfully

Bryan Cave Leighton Paisner LLP



Phil Spencer
Senior Associate
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phil.spencer@bcplaw.com
T: +44 20 3400 3119 M: +44 7738 037271

From: Phil Spencer
Sent: 05 August 2025 20:32
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Yours faithfully

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From: Phil Spencer

Sent: 19 August 2024 17:43

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A copy of the Order granted is attached to this email.

Yours faithfully

Bryan Cave Leighton Paisner LLP



Phil Spencer
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Bryan Cave Leighton Paisner LLP
Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, United Kingdom

[bclplaw.com](https://www.bclplaw.com)

Certificate of service

Name of court High Court of Justice, King's Bench Division	Claim No. KB-2024-002596
Name of Claimant (1) London Southend Airport Company Limited (2) London Southend Solar Limited (3) Thames Gateway Airport Limited	
Name of Defendant PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHBEND AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE AMENDED PARTICULARS OF CLAIM	

On what day did you serve?
1 8 / 0 9 / 2 0 2 5

The date of service is
1 8 / 0 9 / 2 0 2 5

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Sealed Application Notice dated 13 August 2025

On whom did you serve?
(If appropriate include their position e.g. partner, director).

The Defendants as required by Paragraphs 7-13 of the Order of Farbey J dated 14 August 2024

How did you serve the documents?
(please tick the appropriate box)

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify)

☒ by other means permitted by the court (please specify)

By the methods and at the locations prescribed by paragraph 9 of the Order of Farbey J dated 14 August 2024

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)

☐ by other electronic means (.....time sent, where document is other than a claim form) (please specify)

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the ☐ claimant's ☒ defendant's

☐ solicitor's ☐ litigation friend

☐ usual residence

☐ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☒ other (please specify)

Locations specified at paragraph 9 of the Order of Farbey J dated 14 August 2024, pursuant to paragraph 11.2 of which service was deemed completed at 11:14 on 18 September 2025

I believe that the facts stated in this certificate are true.

Full name	Philip Keith Spencer		
Signed	DocuSigned by: Philip Spencer 656A85CC3CB44E1 Claimant's solicitor	Position or office held	Senior Associate at Bryan Cave Leighton Paisner LLP (If signing on behalf of firm or company)
Date	1 8 / 0 9 / 2 0 2 5		

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Made on behalf of the Claimants
Witness: Marc Taylor
Number of Statement: First
Exhibit: MT1
Dated: 9 August 2024

IN THE HIGH COURT OF JUSTICE

KING’S BENCH DIVISION

BETWEEN:

- (1) LONDON SOUTHEND AIRPORT COMPANY LIMITED**
- (2) LONDON SOUTHEND SOLAR LIMITED**
- (3) THAMES GATEWAY AIRPORT LIMITED**

Claimants

- and -

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN
(WITHOUT THE CLAIMANTS’ CONSENT) UPON ‘LONDON SOUTHEND
AIRPORT’ AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO
THE PARTICULARS OF CLAIM**

Defendants

FIRST WITNESS STATEMENT OF MARC TAYLOR

I, MARC TAYLOR, will say as follows:

- 1 I am the acting Chief Executive Officer of the First Claimant, London Southend Airport Company Limited. I was appointed to this role in May 2024, having worked at London Southend Airport (“London Southend” or the

“Airport”) for over 26 years. During my tenure, I have also held the roles of Head of Asset Management and the Operations Director.

2 The other Claimants are subsidiary companies of the First Claimant and I am also acting CEO of those entities.

3 The formulation and execution of strategy for London Southend is my responsibility. I am also the Accountable Manager to the Civil Aviation Authority for issues involving security and safety.

4 I make this statement to support the proceedings for injunctive relief issued by the Claimants. As detailed below, the Defendants have started, and continue to threaten, direct action causing severe disruption to UK airports during the summer of 2024.

5 I refer to a paginated bundle of documents, attached as Exhibit “MT1”; where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit “MT1”.

6 I am duly authorised to make this statement on behalf of the Claimants.

7 In preparing this statement, I have had sight of the statement of the First Witness Statement of Akhil Markanday, the Claimants’ solicitor (“BCLP’s Statement”), and the papers relating to the injunctions that have been granted to the other airports in or around London. BCLP’s Statement details the group known as Just Stop Oil (“JSO”), the threat JSO poses to airports and the unlawful direct action its members have undertaken in recent weeks. Some of the points raised there are equally relevant here, overlapping and interconnecting with the concerns of the Claimants set out below.

8 Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge.

9 Where facts and matters referred to in this statement are not within my own knowledge they are based on instructions, documents and information supplied to me in my capacity as acting CEO of the First Claimant and are

true to the best of my knowledge and belief.

LONDON SOUTHEND AIRPORT – BUSINESS

- 10 London Southend has a unique position in the region serving the needs of both private aviation and commercial airlines. One major airline, easyJet, accounts for the majority of London Southend’s scheduled passenger services, catering for up to 300,000 passengers per year and focusing on the leisure market. Alongside this, the Airport also offers business services to VIP and business individuals.
- 11 During August and September 2024, London Southend expects to serve approximately 33,000 – 37,000 passengers per month.
- 12 Our operating hours (for flight departures and arrivals) vary depending on the schedules and needs of our customers, with the Terminal building being open and accessible accordingly.
- 13 London Southend’s average daily revenue in August 2024 is projected to be over £67,000.

LONDON SOUTHEND AIRPORT – REGULATIONS, CONSENT TO ENTER AND BYELAWS

- 14 The details of the land ownership of the Airport are given at paragraphs 11-13 of BCLP’s Statement and the list of relevant HM Land Registry titles is annexed to the Particulars of Claim. In brief, the First Claimant is the operator of London Southend and the owner (either as freeholder or leaseholder) of the majority of the Airport’s land. The Second Claimant is the leasehold owner of a solar farm within the Airport grounds. The Third Claimant is the leasehold owner of a hotel within the Airport grounds.
- 15 The First Claimant’s licence to operate London Southend is evidenced by aerodrome certification (the “Certificate”) [MT1/3] granted by the Civil Aviation Authority (CAA) in accordance with UK Reg (EU) No 139/2014 (the UK Aerodromes Regulation).

- 16 The Certificate entitles London Southend to operate the aerodrome and requires compliance with various safety and operational standards. The certification includes the aerodrome manual for London Southend **[MT1/4-35]** which is required to contain or refer to all necessary information for the safe use, operation and maintenance of the aerodrome, its equipment, as well as its obstacle limitation and protection surfaces and other areas associated with the aerodrome.
- 17 The nature of London Southend is such that members of the public have a licence to enter specified areas of the airport, with the Claimants' permission and consent, for legitimate short-term purposes related or connected to air travel or other legitimate reasons (for example, accessing flying clubs). Examples of legitimate purposes include travelling themselves or to pick up passengers. Various other activities are expressly prohibited. Anything that will intentionally interfere with the smooth functioning of airport operations is prohibited.
- 18 All persons entering London Southend are subject to byelaws which regulate the use and operation of the airport and the conduct of all persons while within the airport **[MT1/36-285]** (the "Byelaws").
- 19 In headline terms, the Byelaws set out acts which are prohibited and others for which permission is required. The Byelaws were made under Section 63 of the Airports Act 1986. Section 64 of the Airports Act 1986 provides that any person contravening any byelaws made under Section 63 commits a criminal offence in doing so and is liable on summary conviction to a fine.
- 20 By Byelaw 4(12), no person shall remain on the Airport after having been requested to leave, such request arising where that person is causing a disturbance or is about to commit an offence (including a breach of a Byelaw).
- 21 By Byelaw 4(16) of the Byelaws, no person shall intentionally obstruct or interfere with the proper use of the Airport or with any person acting in the execution of his duty in relation to the operation of the Airport.

- 22 By Byelaw 4(22) of the Byelaws, no person shall organise or take part in any demonstration, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the safety of passengers or persons using the Airport.
- 23 Accordingly, although members of the public have an implied consent to enter the Airport for the purpose of travelling by air and for directly related purposes, they do not have permission to enter or remain or occupy any land thereon for the purposes of:
- 1) Causing a disturbance or being about to commit an offence, including breach of a Byelaw (Byelaw 4(12)); or
 - 2) Intentionally obstructing or interfering with the proper use of the Airport (Byelaw 4(16)); or
 - 3) Organising or taking part in any demonstration, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the safety of passengers or persons using the Airport (Byelaw 4(22)).

IMMINENT AND SERIOUS THREAT TO LONDON SOUTHEND AIRPORT

- 24 JSO is a civil resistance group with environmentally orientated, political aims. As explained in the BCLP Statement, at paragraphs 25-36, JSO has begun a campaign of disruptive action against airports over the summer months of 2024. There have been a number of incidents of direct action at UK airports in recent days and weeks, as shown by paragraphs 38-45, and JSO continues to pose a very real threat to the UK airport industry.
- 25 In response, the Claimants, having carefully considered all options, have made this application for an injunction to restrain unlawful activity by JSO or similarly disposed groups at London Southend. As explained below, if the threatened disruption occurs at London Southend, it will cause significant damage and expose the Airport, its staff, its passengers and any interconnected enterprises to severe risks of physical and/or financial harm.

26 The BCLP Statement (including its Exhibit AM1), at paragraphs 14-50, generally discusses the current threat posed by JSO to airports. One point that bears repeating is that the Police have been compelled to act against JSO activists, over the last few months [AM1/10-19], in recent weeks [AM1/7-9] and recent days [AM1/20-21]. Despite the Police reaction and the arrest of numerous JSO activists, JSO is defiant and continues to confirm its intention to disrupt airports [AM1/22-23].

PREVIOUS INCIDENTS AT LONDON SOUTHEND AIRPORT

27 London Southend is a highly probable target for disruptive action. This is evidenced by the many previous instances where intentionally disruptive direct action has been undertaken by activists at London Southend.

28 Some examples of past incidents are the following:

- (a) On 9 May 2019, Extinction Rebellion held a demonstration on climate change. This caused disruption on the approach road to the Terminal and passengers were unable to pass through or access the Airport due to this disruption. Passengers on foot were heckled by Extinction Rebellion activists upon arrival at the Terminal.
- (b) On 25 January 2020, London Southend received intelligence that Extinction Rebellion would be holding a demonstration at the Airport. Two individuals, wearing Extinction Rebellion branded clothing, were asked to leave after admitting to conducting reconnaissance, once a member of the public reported their suspicious behaviour to the control centre. These activists verbally abused the security patrol who attended the area before eventually leaving.
- (c) On 29 February 2020, Extinction Rebellion, again, explicitly threatened to disrupt London Southend. The Airport received intelligence that emails had been sent to the local Police warning them of co-ordinated disruption by Extinction Rebellion activists. This involved the group, through communication published on social media, requesting as many activists as possible to join together to

disrupt the Airport and stated a specific time to convene for the disruption.

- (d) On 1 March 2020, six people claiming to be supporters of Extinction Rebellion were requested to leave the Airport after admitting to conducting reconnaissance. Police intervention was required.
- (e) On 28 and 29 August 2020, the Airport received intelligence of planned disruption from Extinction Rebellion. One arrest was made following an individual admitting to hostile reconnaissance within London Southend and refusing to leave the Airport.
- (f) On 23 November 2021, twelve JSO activists entered the Terminal with three large oil drums. These JSO activists verbally challenged passengers and distressed minors, disrupting the Airport at large. This disruption lasted for 60 minutes and Police intervention was required. In parallel, a further two JSO incidents exploited the distraction caused by the Terminal disruption to conduct an airside breach. This additional incident of disruption by JSO was intercepted by security and the perpetrators removed from the Airport. The JSO trespassers filmed their activity throughout and tried to intimidate the Airport's security, by being verbally aggressive and making derogatory comments to the Airport's staff.
- (g) On 1 December 2021, Extinction Rebellion disrupted an approach road leading to the Airport. This disruption lasted four hours and necessitated Police intervention.

29 As stated in the BCLP Statement, at paragraph 15, JSO was “masterminded” by an individual linked with Extinction Rebellion. This explains why I believe that the actions at London Southend, previously perpetrated under the Extinction Rebellion banner and which I set out in the previous paragraph, are relevant to the current risk presented by JSO. As explained in the BCLP Statement, it is JSO which is presently the vocal group threatening to disrupt UK airport operations. It is for this reason that the injunctive relief the Claimants seek is directed principally at that group.

HEALTH AND SAFETY CONCERNS

- 30 London Southend is a complex operational environment. Health and safety is of the utmost important. We consider there to be a concrete and serious risk that any unlawful direct action may endanger our staff, other companies staff, passengers, other legitimate visitors and also, the perpetrators themselves.
- 31 Having been targeted by environmental groups before, the Claimants feel the health and safety risks particularly acutely.
- 32 There are plainly serious risks arising from any activity being on an active runway/taxiway, especially if conducted by untrained individuals. It is worth mentioning the less apparent risks also:
- (a) individuals who are not trained or being supervised will have no idea about the numerous hazards associated with airports and the precise nature of the dangers. Our ground-staff are trained in airport health and safety issues so they can operate properly and safely, but even they have to remain vigilant;
 - (b) airline pilots as well as authorised vehicle drivers on access roads between terminals and aircraft stands will not be expecting trespassers on or near the taxiway/runway. Any sudden need by pilots or drivers to take evasive action could put people at risk;
 - (c) as with all airports, movements on the taxiway/runway are carefully managed by air traffic control. Air traffic control, naturally, have no ability to communicate with trespassers to ensure their own safety around aircraft and ground traffic movements; and
 - (d) the emergency services and our own rescue and fire-fighting team may have to endanger themselves in order to remove and/or rescue trespassers. In the event of an airfield emergency, their response may be hampered with serious potentially fatal consequences.

33 All these risks are heightened at London Southend given the unusual features of the Airport. These include:

- (a) London Southend is a designated London Airport. The Airport's proximity to London ensures it is easily accessible.
- (b) There are known expansion plans to develop the Airport and allow the handling of more flights and passengers.
- (c) There is a golf course next to the runway which presents a risk as an easier, open access route.
- (d) The Jet Centre has a public entrance from a landside car park. The Jet Centre also handles numerous high profile people, including celebrities, which it would undoubtedly be desirable for JSO to seek to disrupt.
- (e) The distance between the Terminal building and the runway is short. Passengers often walk directly from the Terminal to board their flight (rather than over jet-bridges, or being bussed to remote stands as is common at other airports). This direct route to boarding provides ample opportunity to undertake direct action in a high risk area of the Airport.
- (f) The Airport, due to its location, has an excellent weather record and may be used by airlines as a diversion alternative when adverse weather or incidents cause other London airports to be closed. Given this strategic status, the Airport is liable to be attacked in conjunction with any other Airport, to fully maximise any resulting disruption.
- (g) There are no physical barriers between the Terminal building (including its walkways towards aircraft stands) and the actual aircraft stands on the apron.

34 Additionally, London Southend is a potential target for terrorist activity. This is demonstrated by the fact that the Airport's security team are constantly involved in counter-terrorism tasks, working in partnership with the Police to

ensure the safety of passengers and staff. The heightened risk of terrorist attack at the Airport is explained by a few factors. First, its size, being the sixth largest airport in London. Second, it is easily accessible, including via a direct rail link to London in 45 minutes. Third, the nature of the individuals using the Jet Centre. Fourth, the ability to use the Airport as a smokescreen to distract Police from other London airports.

SEVERE IMPACT OF DISRUPTION

35 In addition to the safety and security risks that I have discussed above, any direct action undertaken by JSO or its affiliates against the Airport, would likely have the following harmful impacts:

- (a) Direct action could cause significant disruption to innocent travellers, in the form of delays, diversions and cancellations, as a result of planes not being able to land or take-off from London Southend. Flights in the summer operate at a very high load factor (i.e. aircraft are at or near full capacity). The effect of this is that: (1) a very high number of travellers could be affected by the disruption; and (2) there would be very few spare places on alternative flights on which passengers could be re-booked;
- (b) Secondly, the disruption caused by direct action may have a significant impact on businesses and the wider economy. Business travel would be disrupted by flights not being able to take off and land at the Airport; and
- (c) Significant Police resources will likely be deployed to London Southend, not only from the Essex Police, but from other neighbouring Police forces as well. The impact of this is twofold: (1) vital Police resources are diverted away from other areas with the result that such other areas become more vulnerable to crime; and (2) the considerable additional costs of this policing.

LIKELY FINANCIAL IMPACT

- 36 The Claimants derive multiple streams of revenue from their ownership and management of the Airport. In addition to services to airlines, the Airport earns revenue from several other sources – for example, concession fees from retail operators, income from car parks, advertising revenue, renting airport premises, use of parts of the Airport as a filming location, fuel sales and general ancillary aviation related revenue.
- 37 The direct action being threatened by JSO would cause the Claimants substantial economic loss. My finance team have estimated that the Claimants would suffer direct financial losses (i.e. ignoring any reputational costs) of approximately £125,000 if the Airport were closed for a day, with this amount rising as passenger traffic increases in future years. Furthermore, the Claimants would incur consequential losses arising from assisting disrupted passengers (such as in providing spending vouchers for meals and hotel accommodation).

ESSEX POLICE ADVICE

- 38 I am informed by Chief Inspector Paul Hogben that, during meetings with senior officers of Essex Police on 2 July 2024, we were advised by the Police to consider applying for a civil injunction.

THE BALANCE OF JUSTICE/COMPELLING JUSTIFICATION

- 39 Given the foregoing, I believe that:
- (a) the Airport is a prime target for disruptive direct action by environmental protest groups such as JSO. The campaign against airports promoted by these groups intends to disrupt airports and London Southend, given its size and geographical characteristics, is especially vulnerable;
 - (b) the risk to London Southend has been exacerbated by the fact that all other London airports (and nearly all of the major UK airports) are protected by an injunction;

- (c) it is very unlikely that JSO will make a public announcement concerning the location, time and date of any direct action. Therefore, an urgent injunction is appropriate in such circumstances;
- (d) having discussed with BCLP, I appreciate that damages would not be an adequate remedy for the Claimants with reference to the impact of disruption when viewed as a whole. In addition to the large financial losses I refer to above, we must also consider (i) health and safety risks, (ii) disruption inconvenience to passengers and staff, and (iii) dangers associated with the risk of extended plane holding or diversions. Furthermore, there is no credible reason to believe any of the Persons Unknown could or would meet any award of damages;
- (e) since the Claimants seek only to prevent unlawful activity, there is no obvious way the Defendants will suffer any actionable loss; and
- (f) the grant of the injunction sought would be a genuinely appropriate and effective deterrent to prevent unlawful behaviour.

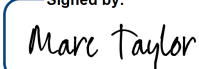
CROSS – UNDERTAKING IN DAMAGES

40 I am not aware of any loss or damage the Defendants could bring an action for. Nevertheless, following general practice, I am authorised on behalf of the Claimants to provide the necessary cross-undertaking to pay any sum which the Court considers appropriate to compensate anyone affected by the proposed injunction if it is subsequently determined that the Claimants are not entitled to the order which they seek.

Statement of Truth

I believe that the facts stated in this Witness Statement and Exhibit are true. I understand that proceedings for contempt of court may be brought against anyone 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.

Signed by:

.....474A62B94521461.....

Marc Taylor

9 August 2024

Made on behalf of the Claimants
Witness: Akhil Markanday
Number of Statement: First
Exhibit: AM1
Dated: 9 August 2024

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BETWEEN:

**(1) LONDON SOUTHEND AIRPORT COMPANY LIMITED
(2) LONDON SOUTHEND SOLAR LIMITED
(3) THAMES GATEWAY AIRPORT LIMITED**

Claimants

- and -

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN
(WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHEND
AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO
THE PARTICULARS OF CLAIM**

Defendants

FIRST WITNESS STATEMENT OF AKHIL MARKANDAY

I, **AKHIL MARKANDAY**, of Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, **will say as follows:**

1 I am a partner in the firm of Bryan Cave Leighton Paisner ("**BCLP**"). BCLP act for the Claimants in this matter, under my supervision. I am duly

authorised to make this witness statement on behalf of the Claimants.

- 2 I make this witness statement in support of an application by the Claimants for injunctive relief.
- 3 Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge.
- 4 Where facts and matters referred to in this statement are not within my own knowledge they are based on instructions, documents and information supplied to me in my capacity as solicitor for the Claimants and are true to the best of my knowledge and belief.
- 5 I refer to a paginated bundle of documents, attached as Exhibit “**AM1**”. Where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit “**AM1**”.

INTRODUCTION

- 6 Earlier this year, the Just Stop Oil environmental campaign (“**JSO**”) made well publicised threats to disrupt airports during the summer of 2024 [**AM1/5-6**]. From mid-July 2024 onwards, JSO has followed through on these threats, commencing unlawful direct action at airports in the UK (alongside affiliated groups doing similar across Europe) with alarming frequency, as discussed further at paragraphs 38-45.
- 7 This follows a pattern of JSO undertaking unlawful direct action on numerous other occasions in recent years. As well targeting airports, JSO has targeted key transport infrastructure such as motorways and private organisations such as oil companies.
- 8 The Police have been forced to act numerous times against JSO activists – many of them repeat offenders – and against the immediate and serious risk of disruption JSO continues to pose. During the last week of June 2024, a number of JSO members were arrested in relation to public order offences arising from the group’s threat to airports [**AM1/13-19**]. On 24 July 2024, ten

JSO members were arrested for conspiracy to interfere with key national infrastructure at Heathrow Airport [AM1/7-9]. On 5 August 2024, four JSO activists were arrested by Police near Manchester Airport on suspicion of conspiring to cause a public nuisance. Media reports state that the JSO activists were found with items which would have been used to cause “*damage and significant disruption*” to airport operations [AM1/20-21].

9 Following the arrests in June, JSO publicly stated that they “*will not be intimidated*” and that they “*are joining an international uprising*” [AM1/22-23]. As explained later in this statement, JSO has commenced its campaign against airports.

10 As explained in the First Witness Statement of Marc Taylor, the Claimants consider that direct action at London Southend Airport (“London Southend” or the “Airport”) by JSO would have grave security and safety consequences. Furthermore, there could be significant disruption in the form of delays, diversions and cancellations, which would cause serious detriment to travellers, local businesses and the wider economy.

LONDON SOUTHEND LAND OWNERSHIP

11 A plan [AM1/24] demonstrates the Claimants’ ownership of the land composing London Southend – shaded in yellow are titles at HM Land Registry (“HMLR”) for which one of the Claimants is a registered proprietor (the “**Yellow Plan**”) or (where unregistered) holds a lease. A complete list of titles is annexed to the Particulars of Claim and the HMLR Official Copies are exhibited at [AM1/171-267]. In respect of the northern-eastern most portion of the Airport (i.e. that cross-shaped area, in which are located navigation approach lights for the Airport), the Claimants’ title (under an unregistered lease [AM1/268-283] is to the particular circles of land on which each navigation light is situated. For practicality’s sake, and mirroring the outline of the Airport in the byelaws plan (which I explain at paragraph 13 below) and the treatment by HMLR of the southern-western approach lights, the whole of the cross-shaped lighting apparatus is shown outlined in red.

- 12 In addition to the Yellow Plan, we have produced Plan A [AM1/25] which also shows the land within London Southend to which the Claimants do not have a right to immediate possession, due to various occupational leases. That is the blue hatched land on Plan A. The area shown shaded orange on Plan A is the Terminal building. There are two floors in the Terminal building and different parts are leased to, or otherwise occupied by, third parties, such as the retail units. In light of the complexity of seeking to show which parts of the Terminal building are ones to which the Claimants are entitled to immediate possession and those parts which are subject to leases (etc.), for the purposes of this claim, the Terminal building has been excluded from those parts of London Southend to which the Claimants assert an entitlement to immediate possession by reason of its freehold or leasehold ownership.
- 13 The red edging around Plan A sets out the clear boundary of London Southend, consistent with its byelaws' plan (see paragraph 18 of the First Witness Statement of Marc Taylor), including runway approach lighting on land demised to the First Claimant. It is in respect of the entirety of the areas edged red which the Claimants seek an injunction to restrain trespass and/or nuisance as further explained in the Particulars of Claim.

BACKGROUND TO JUST STOP OIL

- 14 My understanding of JSO is based on public statements and communications, as well as having had the benefit of reading the background set out in other recent injunction applications, including for London Heathrow Airport where my firm acted.
- 15 JSO is said to have been “masterminded” by Roger Hallam who also has strong ties to other disruptive direct action groups, including Extinction Rebellion and Insulate Britain [AM1/26-28]. These other groups also have a history of undertaking unlawful direct action. Extinction Rebellion, in particular, have on several previous occasions undertaken direct action specifically against London Southend as detailed in paragraph 28 of the First Witness Statement of Marc Taylor.

16 The JSO website reveals that it is “a member of the A22 Network of civil resistance projects” [AM1/29].

17 A22’s website homepage declares that:

“We are an international network racing to save humanity. We have a recipe for effective civil resistance. Support us. Join us. You are needed”. [AM1/30]

18 A22’s declaratory statement underlines A22’s desire to use disruptive tactics; stating that, amongst other tactics, *“we commit to mass civil disobedience”* [AM1/31]. The fact that JSO is a part of the A22 network emphasises its commitment to civil disobedience. Other organisations within JSO’s wider group can be seen on JSO’s website [AM1/32]. This includes ‘Last Generation’ who have a strong history of unlawful direct action [AM1/33-37], and are mostly active in Germany, France, Italy and Poland.

19 On its website and in press releases, JSO has referred to itself as a:

- (a) *“nonviolent civil resistance group.”* [AM1/40]; and
- (b) *“coalition of groups working together to demand the British government work with other nations to establish a legally binding treaty to stop extraction and burning of oil, gas and coal by 2030, whilst supporting and financing other countries to make a fair and just transition.”* [AM1/54]

20 JSO has a ‘Frequently Asked Questions’ page (“FAQ”) on its website [AM1/38-42]. From this, it is clear JSO is committed to civil disobedience. In response to the question, ‘What are you going to do?’, the FAQs state:

“We are going to cause disruption, making our demand unignorable.”

21 The FAQ further clarifies how JSO intends to behave, including using:

“tactics such as strikes, boycotts, mass protests and disruption to withdraw their cooperation from the state.”

- 22 In response to the question of “*Will there be arrests?*”, the following FAQ reply is given:

“probably, yes. There is a long established tradition in the UK of citizens, when they recognise that the state is acting immorally, taking action to prevent further harm.”

- 23 Though it has now been removed, as of 1 July 2024, the JSO FAQ page also had the following text, emphasising (1) JSO’s commitment to civil disobedience and (2) the interrelation and strong connection between JSO and Extinction Rebellion, as explained in paragraph 15 above (my emphasis added):

“Extinction Rebellion and Insulate Britain have demonstrated that Civil Disobedience works. They also show that we need to do significantly more to stop the greatest crime against humanity. **That’s why we are moving into Civil Resistance** — it’s no longer about a single project or campaign, it’s about resisting a Government that is harming us, our freedoms, rights and future, and making them work for us.”

- 24 The JSO website also includes a section entitled ‘Law’, which includes a sub-section detailing support offered for individuals facing criminal charges for taking the actions JSO is encouraging [AM1/43-46]. As at 8 August 2024, it displayed statistics of JSO’s relationship with the Police and criminal justice system, stating that since the group’s inception there have been:

- (a) 2970 arrests;
- (b) 1889 charges;
- (c) 475 convictions;
- (d) 100 acquittals;
- (e) 129 cases dismissed; and
- (f) 1086 trials to come.

THE CURRENT THREAT TO AIRPORTS IN GENERAL

25 On 13 June 2024, JSO released a statement referring to an ultimatum it had delivered to the leaders of all major political parties running in the UK General election [AM1/47-51]. This ultimatum demanded that the leaders of these political parties, assuming they gain power in the election, should “*immediately commit the UK government to work with other nations 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 fair and just transition.*” The ultimatum was compounded by the following threat (my emphasis): “*If you do not provide such assurance by 12 July 2024, we will be forced to take action to protect our communities by engaging in a campaign of noncooperation against fossil fuel use at airports across the country.*”

26 On 16 July 2024, JSO wrote a letter to the new Prime Minister, Keir Starmer, to follow up on its ultimatum and confirm JSO was preparing to take action [AM1/57-61]. Referencing its ultimatum, JSO stated (bold emphasis original, underlining added by me):

*We last wrote to you in your role as leader of the Labour Party on 24 June to demand that, should you become our next Prime Minister, you immediately commit the UK government to **working with other nations 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 fair and just transition.***

We indicated that unless such assurances were provided by 12 July, we would be forced to take action to protect our communities by engaging in a campaign of noncooperation against fossil fuel use, at airports across the country.

We are writing now to let you know that since no such assurances have been received we remain in civil resistance and are preparing to take action.

27 On 22 July 2024, JSO released a statement on its summer actions [AM1/62-66]. Referring to its previous ultimatum and the failure of the new Government to meet its demands, the statement promised that “**JSO will be taking action at airports this summer**”.

28 On 5 August 2024, JSO released a press statement [AM1/135-138] which concluded with the following threat against airports (my emphasis):

“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.”

29 In support of its aim to disrupt airports in the summer months, JSO has set up at least two fundraising pages:

(a) Fund Radical Climate Action — Just Stop Oil | Chuffed | Non-profit charity and social enterprise fundraising [AM1/67-70]

(b) Just Stop Oil: Summer Actions | Chuffed | Non-profit charity and social enterprise fundraising [AM1/71-74]

30 Fundraising page (a), which has raised £165,948 as of 8 August 2024, states the following (original bold emphasis, underlining added by me):

We're escalating our campaign this summer to take action at airports.

...

*To make this action phase happen, we have a costed plan...**During June and July, we expect to spend around £180,000, some of which we have already secured, and the rest we must raise now.***

- 31 Fundraising page (b), which has raised £24,650 as of 8 August 2024, states (original bold emphasis, underlining added by me):

“Just Stop Oil: Summer actions. This summer, we continue in resistance.

*We’ll be taking action at sites of key importance to the fossil fuel industry; **super-polluting airports.***

- 32 It appears JSO has been encouraging and incentivising an acceleration of donations, suggesting significant action is being planned in the near term for which funds are needed. On Instagram on 1 August 2024, [AM1/75-76] JSO’s official account states: “*we need action. That’s why a group of scientists have given personally to **DOUBLE** your donation from now until Monday*”

- 33 On a separate fundraising page for ‘Oil Kills’, there was posted to the comments section an event scheduled for 1 August 2024 [AM1/77-81] entitled “*Oil Kills – International Uprising: Week 1*” was shown as scheduled with the following description (my emphasis):

OIL KILLS – International Uprising, Week 1

*Thank you for all of your generous support. **Your donations keep resistance going.** Here's a quick recap on our five main aims for this action phase:*

- 1. Get an international Fossil Fuel Treaty on the agenda*
 - Media mentions on the treaty are up 8000%.*
- 2. Highlight the link between climate crisis and fossil fuels*
 - Our actions are happening during the hottest days ever on record.*
- 3. Take action together to bring smaller countries' groups into the media*

- *The Norwegian group has made it onto their national news for the first time, and the Canadian group is getting prime time TV slots.*

4. *International story*

- *We've been on CNN, Aljazeera, Oil Price, The Guardian, Telegraph, Die Zeit, and many, many more.*

5. *Mobilise internationally*

- *Made a good start but **lots more work to do!***

34 An event scheduled by an affiliate group of JSO (as explained above, JSO is part of an international network) entitled “*How to block airports*” [AM1/82-86] was scheduled for August 5 2024. The description states (my emphasis):

Did you hear it? This summer, many groups from the climate justice movement have been buzzing with actions targeting aviation. This comes after actions against private jets and the luxuries of the super-rich in the past years, joining a movement all over the world who have been struggling for decades to defend themselves against this destructive sector and to topple it, ending the injustice it brings about.

In this workshop, we aim at making it easy for you and your group to plan an action around aviation, be it to target an airport or an industry event. Have you struggled to come up with plans for an effective action to resist a local airport conflict? Do you burst with the injustice caused by the super-rich who burn the planet with their private jets? Do you want to interrupt a business event with style? Join us and learn about targets, tactics and narratives you can use in your AviActions and discover inspiring actions and lessons learned from them.

35 There has been extensive media coverage of JSO’s publicised plans to cause disruption. The Daily Mail posted an online article entitled ‘*Exclusive*

Revealed: The eco mob plot to ruin the summer holidays with activists planning to disrupt flights by gluing themselves to major airport runways' [AM1/87-95] and states that JSO have advocated the following unlawful activities:

- *“Cutting through fences and gluing themselves to runway tarmac;*
- *Cycling in circles on runways;*
- *Climbing on to planes to prevent them from taking off;*
- *Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.”*

36 Since that article, several other publications have reported on JSO’s campaign to disrupt and focus on airports, a selection of examples is at [AM1/96-112]. These reports are validated by the disruptive action undertaken by JSO at airports in recent weeks, described further at paragraphs 38-50.

37 Although on 7 August 2024, JSO claimed they were “pausing” their actions due to various riots in England [AM1/113-118], neither I nor the Claimants have any reason to believe this reduces the real and imminent threat to the Airport. Firstly, there is no suggestion of how long any actual “pause” will last. Secondly, there is no reason to take JSO at their word on this point. Any promise of a “pause” may simply be a tactic to lull airports, the public and the Police into a false sense of security. Thirdly, I understand from media reports that the wide-spread disorder feared for the evening of 7 August 2024 failed to materialise, such that there is reason to believe that the recent period of violent disorder (and therefore any associated “pause” by JSO) has already come to an end.

RECENT UNLAWFUL ACTION AT UK AIRPORTS

38 On 2 June 2024, Extinction Rebellion (who are related to JSO, as explained in paragraph 15) activists blocked access to Farnborough Airport [AM1/119-133]. This involved different sets of activists carrying out co-ordinated disruptive activities. Some activists barricaded one of the airport’s gates, another four locked on to oil drums, one mounted on a tripod blockaded the

airport's departure gate and another fourth group of activists distracted airport authorities, moving between the airport's other gates to block any enforcement or resolution.

- 39 On 20 June 2024, two JSO activists breached the fence at Stansted Airport and sprayed orange paint over private jets. A link to a video released by JSO is here:

<https://www.instagram.com/reel/C8b1WQHNPfH/?igsh=MTdmMnBvMGRsaWNicg%3D%3D>. This shows a JSO activist cutting a hole in the perimeter fence leading to the runway, before vandalising aeroplanes with paint. Alongside this video, JSO stated on X (formerly Twitter) that the two activists had *“cut the fence into the private airfield at Stansted where taylorswift13’s jet is parked, demanding an emergency treaty to end fossil fuels by 2030”* [AM1/134].

- 40 On 24 July 2024, ten JSO activists were arrested at the perimeter fence of Heathrow Airport for offences under the Public Order Act [AM1/7-9]. A link to a video published on X by JSO is here: https://x.com/JustStop_Oil/status/1816041025514663968. This shows JSO activists cycling near a high barbed wire topped fence close to passenger planes before dismounting and being approached by officers. Cutting gear and glue - tools which are being used by activists in affiliated groups to illegally enter and fix themselves onto airport runways - were found on some of the individuals arrested.

- 41 On 27 July 2024, a JSO activist, supported by two individuals filming the incident, entered Heathrow Terminal Five and held a sign reading ‘Oil Kills’, despite having been notified orally that doing so contravened a live injunction [AM1/139-145]. A link to a video published by JSO is here: <https://drive.google.com/drive/folders/1DzyWY8VBmPz40RdFsz5TBKJHA9niq-ce>

- 42 On 29 July 2024, seven JSO activists entered Gatwick South Terminal and used suitcases with lock-on devices to block the security channel [AM1/10-12]. A link to a video published by JSO is here:

<https://drive.google.com/drive/folders/16PCapYvyzMDYFd7U0RGYZIUe0uTX7rxR>. This shows JSO activists wearing JSO branded clothing obstructing passengers moving through to the security screening area.

- 43 On 30 July 2024, two JSO activists vandalised Heathrow Terminal 5's departure area using fire extinguishers filled with orange paint. Photos of the incident are attached at [AM1/146-149] and a link to a video is here: https://drive.google.com/drive/folders/1_aY7qOKZx0ybMpSt1IGzPCAXdPMu20dq. These show that the floor, departure boards and corridor windows were covered with orange paint causing significant damage. Following the vandalism, two JSO activists sat down and began shouting messages to public. They eventually necessitated physical extraction by the Police.
- 44 On 1 August 2024, six JSO activists blocked access to the security channel of Heathrow Terminal 5 South. A link to a video is here: <https://drive.google.com/drive/folders/1Dgcuv5vJjzfdSrdpX6HJEaayoidc08xy>. These show JSO activists obstructing passengers from entering the gates by forming a human barricade and holding signs entitled 'Oil Kills' and 'Sign the Treaty'. Dense crowds grew around them and a significant number of passengers can be seen trying to escape the area. Some of the JSO activists had to be physically extracted by the Police.
- 45 As noted above at paragraph 8, press reports on 5 August 2024 record the arrest of four JSO activists in the vicinity of Manchester Airport. As stated, it appears that those arrested were equipped with equipment intended to cause disruption at that airport.

RECENT UNLAWFUL ACTION AT AIRPORTS INTERNATIONALLY

- 46 As explained in paragraph 16, JSO is part of an international network of civil resistance groups. Collectively, these groups have agreed to target airports this summer. Intentionally, these groups have co-ordinated their disruptive action with other civil resistance groups and continue to do so, to maximise the disruption caused by their airports campaign.

47 In a press release published after the 1 August 2024 disruption at Heathrow **[AM1/150-156]**, discussed at paragraph 44, JSO states this “*follows an action at Leipzig-Halle Airport in Germany*”, on the same morning, “*where five supporters of Last Generation glued themselves to the tarmac, preventing cargo planes from taking off*”.

48 Similarly, the press release published by JSO following the 24 July 2024 disruption at Heathrow **[AM1/157-162]**, discussed at paragraph 40, states:

“This comes after German supporters of Last Generation blocked air traffic at Cologne Bonn Airport, causing international delays.

Meanwhile, supporters of Folk Mot Fossilmakta (People against Fossil Power) cut through a chain-link fence and sat next to a runway stopping flights departing from Oslo Gardermoen airport.

Also this morning, supporters of Extinction Rebellion in Finland have blocked security gates at Helsinki Vantaa Airport.

Meanwhile in Spain, five supporters of Futuro Vegetal accessed the taxiway at Barcelona airport, however were intercepted before taking action.

In Switzerland, eleven supporters of Drop Fossil Subsidies blocked main roads around both Zurich and Geneva airports.”

49 The press statement published by JSO on 1 August 2024 **[AM1/150-156]**, confirms the intentional and co-ordinated nature of JSO’s direct action:

The Oil Kills international uprising has been taking action at airports around the world.

21 groups across 12 countries have taken action at 20 airports so far. They include Letzte Generation Germany, Folk Mot Fossilmakta and Scientist Rebellion in Norway, XR Finland, Futuro Vegetal in Spain, Just Stop Oil in the UK, Drop Fossil Subsidies and Act Now – Liberate in Switzerland, Letzte Generation Austria, Extinction Rebellion and

Scientists Rebellion in Sweden, Doe Deurne Dicht in Belgium, Last Generation Canada, XR Boston, Last Generation America, and Scientist Rebellion Turtle Island from the USA.

50 A further JSO press statement following the 5 August 2024 Manchester Airport arrests records that JSO’s supporters “*are always fully accountable for our actions and as such the four arrested today will accept any legal consequences*”. The statement continues, however, to state an intention on the part of JSO supporters to “*continue to do whatever is nonviolently possible to demand a Fossil Fuel Treaty and to defend humanity from the consequences of climate breakdown*” [AM1/135-138].

REACTION OF THE POLICE

51 As referred to in paragraph 8, in the week commencing 24 July 2024, ten JSO activists suspected of planning to disrupt Heathrow Airport were arrested under the Public Order Act 2004. An intelligence led operation by the Metropolitan Police showed that JSO intended to gain access to the airside environment through the secure perimeter fence and doing so would have led to the suspension of flight operations causing a major impact to international aviation. Chief Superintendent Ian Howells, who led the operation, said [AM1/163-165]:

“These arrests are an excellent example of coordinated action by colleagues from across the Met to prevent the significant disruption intended by JSO.

“This planned action was extremely reckless and would have represented a real risk to the travelling public. Had it not been for these arrests, flights would have been suspended impacting thousands of passengers and businesses including hard working families going on their summer holidays. It could also have caused serious danger to passengers and aircraft with flights being diverted and cancelled.

52 As referred to in paragraph 8, in the week commencing 24 June 2024, around twenty seven JSO activists suspected of planning to disrupt airports this

summer were arrested under the Public Order Act 2023. Chief Superintendent Ian Howells, who also led that operation, said **[AM1/166-169]**:

“We know Just Stop Oil are planning to disrupt airports across the country this summer which is why we have taken swift and robust action now.

‘Our stance is very clear that anyone who compromises the safety and security of airports in London can expect a strong response from officers or security staff.

‘Airports are complex operating environments which is why we are working closely with them, agencies and other partners on this operation.’

Suspects released on bail are subject to conditions which include not travelling within one kilometre of any UK airport unless passing by while on a mode of transport.”

53 Despite the proactive Police action so far, the threat of severely disruptive action occurring remains, as JSO themselves have made clear **[AM1/22-23]**.

THE THREAT TO LONDON SOUTHEND

54 In response to the tangible, existing and continuing risk of harm posed by JSO’s airports campaign, many UK airports have recently been granted injunctions against ‘Persons Unknown’ connected to JSO. The following table details these injunctions:

Number	Airport	Date Injunction Granted	Link to Papers
1.	London City Airport	20 June 2024	https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction

2.	East Midlands Airport	5 July 2024	https://www.eastmidlandsairport.com/about-us/injunction/
3.	Manchester Airport	5 July 2024	https://www.manchesterairport.co.uk/about-us/injunction/
4.	London Stansted Airport	5 July 2024	https://www.stanstedairport.com/about-us/injunction/
5.	London Heathrow Airport	9 July 2024	https://www.heathrow.com/company/local-community/injunction#:~:text=On%209%20July%202024%2C%20the,campaign)%20without%20the%20consent%20of
6.	Leeds Bradford Airport	18 July 2024	https://www.leedsbradfordairport.co.uk/injunction
7.	London Luton Airport	18 July 2024	https://www.london-luton.co.uk/corporate-site/lla-publications/injunction
8.	Newcastle International Airport	18 July 2024	https://www.newcastleairport.com/about-your-airport/airport-company/injunction/
9.	London Gatwick Airport	19 July 2024	https://www.gatwickairport.com/injunction.html
10.	Birmingham Airport	6 August 2024	https://corporate.birminghamairport.co.uk/injunction/

11.	Bristol Airport	6 August 2024	https://www.bristolairport.co.uk/corporate/about-us/our-policies/injunction/
12.	Liverpool Airport	6 August 2024	https://www.liverpoolairport.com/injunction

55 It is clear JSO does take injunctions into account when inciting people to cause disruption. An example of JSO accounting for the impact of injunctions is JSO's message on X on 29 July 2024 [AM1/170]. I therefore consider that the existence of these injunctions over the other main airports in the UK heightens the risk to London Southend. JSO activists are now less likely to target the airports which have the benefit of injunctions and will turn their attention elsewhere, with London Southend being a particularly likely target as the only London airport now without the protection of such an injunction.

56 Further, London Southend has a number of aspects which make it an attractive target for disruptive direct action. These are further explained in the First Witness Statement of Marc Taylor, at paragraphs 33 and 34, but a few points are demonstrative. Firstly, London Southend, due to its location, has an excellent weather record and is used by airlines as a diversion alternative when adverse weather or incidents cause other London airports to be closed. Given this strategic status, London Southend is liable to be attacked in conjunction with any other airport, to fully maximise any resulting disruption. Secondly, given the small size of London Southend and, unlike bigger airports such as Heathrow, passengers often walk directly from the Terminal to board their flight. This direct route from the Terminal to boarding provides ample opportunity to undertake direct action in a high risk area of London Southend.

THE IMPACT OF DISRUPTION TO LONDON SOUTHEND

57 I have had sight of the First Witness Statement of Marc Taylor on behalf of the Claimants and refer to the facts and figures set out therein.

58 It is clear to me that the primary cause for concern from the unlawful activity which the Claimants seek to restrain, is one of safety (for the wider innocent members of staff and public, but also the participants) and security. London Southend is a crucial piece of UK infrastructure and any unlawful disruption will have multiple ‘knock-on’ effects.

59 Whilst it cannot be denied those effects will have serious financial ramifications, regard should also be had to the various other effects disruption would cause. Particularly, in relation to passengers and airline crew left diverted or delayed around the world.

60 The feared unlawful disruption at London Southend would clearly have numerous serious consequences. Many of which I am not sure the wider public, let alone JSO activists, appreciate.

PROCEEDING AGAINST PERSONS UNKNOWN

61 I am informed by Marc Taylor that the Claimants do not know the names of any individual activists who intend to disrupt operations at London Southend.

62 Though specific individuals within JSO have been charged by the Police in connection with the planned disruption to airports, neither I nor the Claimants have any clear evidence that any of those individuals pose any specific (or any greater) risk to London Southend such that it would be appropriate to name them as a Defendant in this claim at this stage.

63 I am instructed enquiries continue and, should specific individuals be identified in respect of whom there is cogent evidence that they present a specific threat to London Southend, they will be joined as named Defendants to proceedings at that juncture in the usual way.

BRINGING THE CLAIM WITHOUT NOTICE

64 The Claimants believe there is a compelling reason to bring this claim ‘without notice’ based on the fact that notice to the Defendants may cause them to accelerate their unlawful actions, which the injunction sought seeks to restrain. It is unlikely that it will have escaped the notice of JSO that London

Southend is the only major London airport, and one of very few major national airports, that does not have the benefit of injunctive protection. There is therefore a reasonable basis to fear that London Southend may be at risk of imminent action and that any prior notice of this application may accelerate that risk.

SERVICE AND NOTICE OF THE PROCEEDINGS

65 In the present case, the Claimants do not know the names of any individuals who may seek to carry out the activities which the injunction sought is intended to restrain. This is a case in which the identity of such persons can only be described in the manner set out in the descriptions of the Defendants. As such, the injunction sought is a ‘newcomer’ injunctions of the type discussed in the decision of the Supreme Court in *Wolverhampton CC v London Gypsies and Travellers* [2023] UKSC 47; [2024] 2 WLR 45. There is no person upon whom the proceedings could currently be served.

66 In accordance with the Supreme Court’s approach in that case, the focus is not on “service”, but instead on the taking of steps to notify any individuals potentially affected by the application. The draft order sought duly provides for such steps to be taken and contains generous liberty to apply provisions. For completeness, however (and because the practical implementation and effect of these types of injunctions is still a developing area of law), the Claimants seek an order for substituted service providing that the steps they propose to take to notify those affected by this Claim and the injunction sought amount to good service.

67 The Claimants intend to provide copies of the following documents (the “Documents”) to the Defendants:

- (a) Sealed copy of the Claim Form;
- (b) Copy Particulars of Claim;
- (c) Response Pack;
- (d) Copy Application;

- (e) Order;
- (f) Copy of the supporting evidence (First Witness Statement of Akhil Markanday and First Witness Statement of Marc Taylor); and
- (g) Copy of a note of the hearing.

68 The Claimants intend to notify the Defendants in the following way:

- (a) uploading copies of all court documents onto the following website:
<http://londonsouthendairport.com/corporate/injunction>;
- (b) attaching a copy of the Court order in each of the locations shown with a green or purple dot on Plan B [AM1/284]. The green dot locations are where warning notice signage about entering private land is already in place (or currently being added) and the purple dot locations are where Byelaws signage is already in place (or currently being added), i.e. locations where analysis and thinking has already been done on how to communicate to persons unknown they are about to be entering on to private land subject to restrictions;
- (c) attaching copies of the approved warning notice (a draft form of which will be made available for the Court's approval at the first hearing) at each of the locations shown with a green or purple dot on Plan B referring to:
 - (i) these proceedings;
 - (ii) the fact that an injunction is now actively covering London Southend; and
 - (iii) stating that the court documents may be viewed on the London Southend Airport website (and providing the relevant web page address) or may be obtained from the Claimants' solicitors and providing the relevant contact details;

(d) sending an email message to info@juststopoil.org (the email address on the JSO website for general enquiries), juststopoil@protonmail.com and juststopoilpress@protonmail.com providing the same information as that contained in the warning notice.

69 I believe that these would be reasonable steps to draw the Documents to the attention of the persons likely to be affected by the injunctions sought. I consider the above methods would be effective in achieving this. The email addresses are JSO email addresses so there is good reason to believe that the Documents would come to their attention if sent to this email address service. The proposed notices and other steps give any potential newcomer abundant opportunity to be aware of the injunction and underlying materials before engaging in prohibited conduct. These steps are also materially the same as those which have been directed by the Court for notification of the other airport injunctions I refer to at paragraph 54 above.

70 The steps proposed also take into account the fact that the Claimants are in the position of operating a high-profile and highly vulnerable piece of important national infrastructure. Anything to be done in or around the airfield must be extremely carefully considered and balanced against the risks of (a) terrorism (for example, allowing people to exploit packages of documents to conceal dangerous items) and (b) impacting airfield operations (for example, that objects may be detached, accidentally or deliberately, and ingested into aircraft engines, especially at critical phases of landing or taking off).

CONCLUSION

71 There is a serious and imminent risk of disruption at London Southend if the injunction sought is not granted.

72 London Southend is an extremely likely target for direct action in relation to airports. Especially given the disincentive to target the other main airports in or around London, arising from their injunctions.

73 Damages would not be an adequate remedy for the Claimants with reference to the impact of disruption when viewed as a whole. Beyond financial losses, this must factor in, *inter alia*, (i) health and safety risks, (ii) disruption inconvenience to passengers and staff, and (iii) dangers associated with the risk, and wasted fuel, of extended aircraft holding or diversions. In addition, there is no credible reason to believe any of the Persons Unknown could or would meet any award of damages.

Statement of Truth

I believe that the facts stated in this Witness Statement and Exhibit are true. I understand that proceedings for contempt of court may be brought against anyone 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.

DocuSigned by:

 CEE6F743862149D.....

Akhil Markanday

9 August 2024

Certificate of service

Name of court High Court of Justice, King's Bench Division	Claim No. KB-2024-002596
Name of Claimant (1) London Southend Airport Company Limited (2) London Southend Solar Limited (3) Thames Gateway Airport Limited	
Name of Defendant PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS CONSENT) UPON 'LONDON SOUTHEND AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE PARTICULARS OF CLAIM	

On what day did you serve? 20/08/2024

The date of service is 20/08/2024

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Injunction Order, Amended Claim Form, Amended Particulars of Claim, Application Notice, evidence in support and a Note of the Hearing on 14 August 2024

On whom did you serve?
(If appropriate include their position e.g. partner, director).

The Defendants as required by Paragraphs 7-13 of the Order of Farbey J dated 14 August 2024

How did you serve the documents?
(please tick the appropriate box)

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with
(.....time left, where document is other than a claim form) *(please specify)*

☒ by other means permitted by the court
(please specify)

By the methods and at the locations prescribed by paragraphs 7-8 of the Order of Farbey J dated 14 August 2024

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the

☐ claimant's

☒ defendant's

☐ solicitor's

☐ litigation friend

☐ usual residence

☐ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☒ other *(please specify)*

Locations specified at paragraphs 7-8 of the Order of Farbey J dated 14 August 2024, pursuant to paragraph 11.2 of which service was deemed completed at 15:58 on 20 August 2024

I believe that the facts stated in this certificate are true.

Full name	Philip Keith Spencer		
Signed	DocuSigned by: Philip Spencer 656A85CC3CB44E1... Claimant's solicitor	Position or office held	Senior Associate at Bryan Cave Leighton Paisner LLP
			(If signing on behalf of firm or company)
Date	29/07/2025		

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court High Court of Justice, King's Bench Division	Claim No. KB-2024-002596
Name of Claimant (1) London Southend Airport Company Limited (2) London Southend Solar Limited (3) Thames Gateway Airport Limited	
Name of Defendant PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHEAST AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE AMENDED PARTICULARS OF CLAIM	

On what day did you serve?
1 8 / 0 9 / 2 0 2 5

The date of service is 1 8 / 0 9 / 2 0 2 5

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Sealed Application Notice dated 13 August 2025

On whom did you serve?
(If appropriate include their position e.g. partner, director).

The Defendants as required by Paragraphs 7-13 of the Order of Farbey J dated 14 August 2024

How did you serve the documents?
(please tick the appropriate box)

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify)

☒ by other means permitted by the court (please specify)

By the methods and at the locations prescribed by paragraph 9 of the Order of Farbey J dated 14 August 2024

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)

☐ by other electronic means (.....time sent, where document is other than a claim form) (please specify)

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the ☐ claimant's ☒ defendant's

☐ solicitor's ☐ litigation friend

☐ usual residence

☐ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☒ other (please specify)

Locations specified at paragraph 9 of the Order of Farbey J dated 14 August 2024, pursuant to paragraph 11.2 of which service was deemed completed at 11:14 on 18 September 2025

I believe that the facts stated in this certificate are true.

Full name	Philip Keith Spencer		
Signed	DocuSigned by: Philip Spencer 656A85CC3CB44E1 Claimant's solicitor	Position or office held	Senior Associate at Bryan Cave Leighton Paisner LLP (If signing on behalf of firm or company)
Date	1 8 / 0 9 / 2 0 2 5		

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

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Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.