

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

INDEX FOR BUNDLE
REVIEW HEARING
HEARING DATE: 2 JULY 2026

Tab	Document	Date	Page Number
Section A:	Review Hearing		
1	Draft Order	Undated	3 - 16
Section B:	Statements of Case		
2	Amended Claim Form	15 August 2024	17 - 21
3	Amended Particulars of Claim	15 August 2024	22 - 30
Section C:	Orders		

4	Injunction Order	14 August 2024	31 - 41
5	Order of Judge Freedman	22 October 2025	42 - 44
6	Notice of listing in respect of Review Hearing	18 May 2026	45
Section D:	Witness Evidence and Exhibit in Respect of Review Hearing		
7	Third Witness Statement of Philip Keith Spencer	17 June 2026	46 - 57
8	Exhibit PS3	17 June 2026	58 - 116
9	Third Witness Statement of Marc Taylor	17 June 2026	117 - 124
Section E:	Previously Filed Witness Evidence in the Proceedings (excluding exhibits, which are available electronically at www.londonsothendairport.com/corporate/injunction/)		
10	First Witness Statement of Akhil Markanday	09 August 2024	125 - 147
11	First Witness Statement of Marc Taylor	09 August 2024	148 - 160
12	First Witness Statement of Philip Keith Spencer	06 October 2025	161 - 175
13	Second Witness Statement of Marc Taylor	06 October 2025	176 - 180
14	Second Witness Statement of Philip Keith Spencer	16 October 2025	181 - 185

IN THE HIGH COURT OF JUSTICE

Claim No.: KB-2024-002596

KING'S BENCH DIVISION

Before: The Honourable []

On: [2] July 2026 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 Mrs Justice Farbey and continued by the Order dated 22 October 2025 of Judge Freedman (sitting as Judge of the High Court) at the first annual review hearing (“**the Injunction**”)

AND UPON the second review hearing which took place on 2 July 2026 (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 Third Witness Statement of Philip Keith Spencer dated 17 June 2026; and (ii) the Third Witness Statement of Marc Taylor dated 17 June 2026

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 review, as provided for in paragraph 3 of the Injunction.
2. A conformed version of that Injunction is appended hereto for ease of reference.
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: [2] July 2026

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

VARIED AND CONTINUED PURSUANT TO THE ORDER OF HIS HONOUR JUDGE FREEDMAN (SITTING AS A JUDGE OF THE HIGH COURT) DATED 22 OCTOBER 2025 AND FURTHER CONTINUED ON THE SECOND ANNUAL REVIEW HEARING BY THE ORDER OF [] DATED 2 JULY 2026

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:

- (4) LONDON SOUTHEND AIRPORT COMPANY LIMITED
- (5) LONDON SOUTHEND SOLAR LIMITED
- (6) 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 (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@londonsouthendairport.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 contacted the Court requesting the review hearing be listed.

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 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

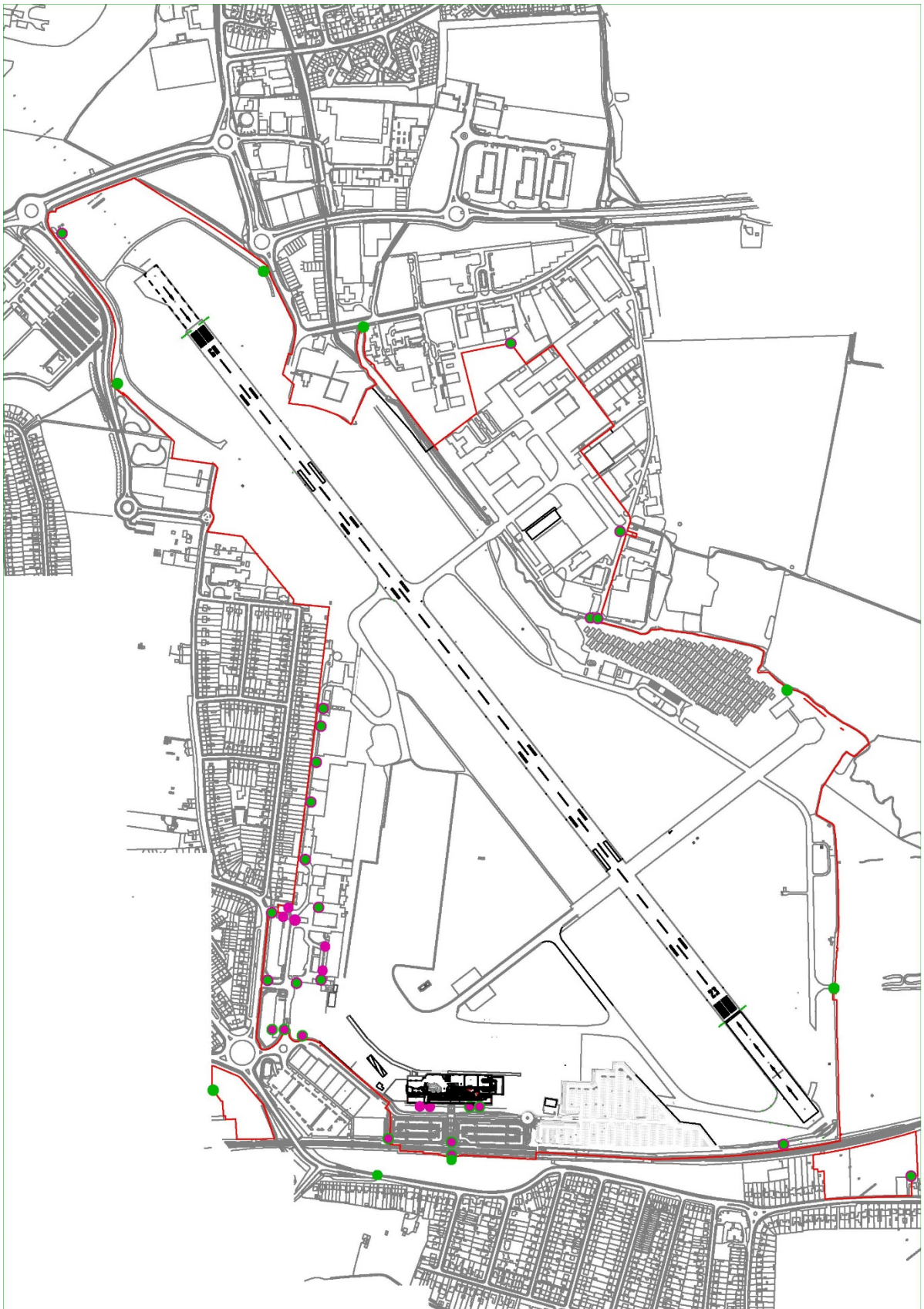
SCHEDULE 1 – CLAIMANTS’ UNDERTAKINGS TO THE COURT

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 3 – EMAIL ADDRESSES

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

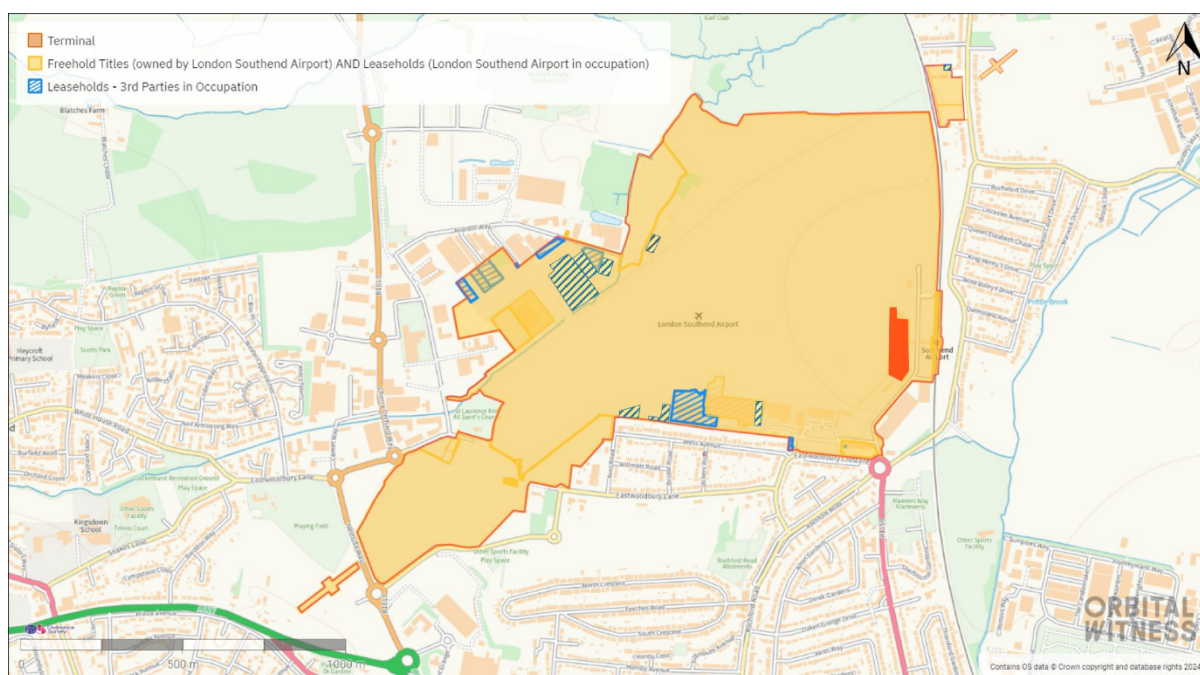
SCHEDULE 4 – PLAN B



**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://londonsouthendairport.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.



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

For court use only

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.

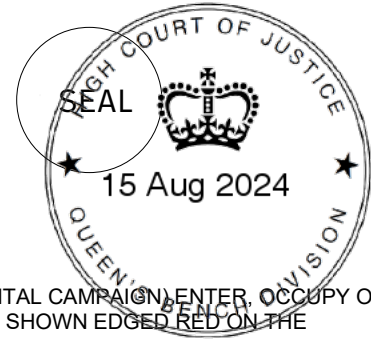
Claim no. **KB-2024-002596**

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	08	2024
----	----	------

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 AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE **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:
Phil Spencer
.....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.

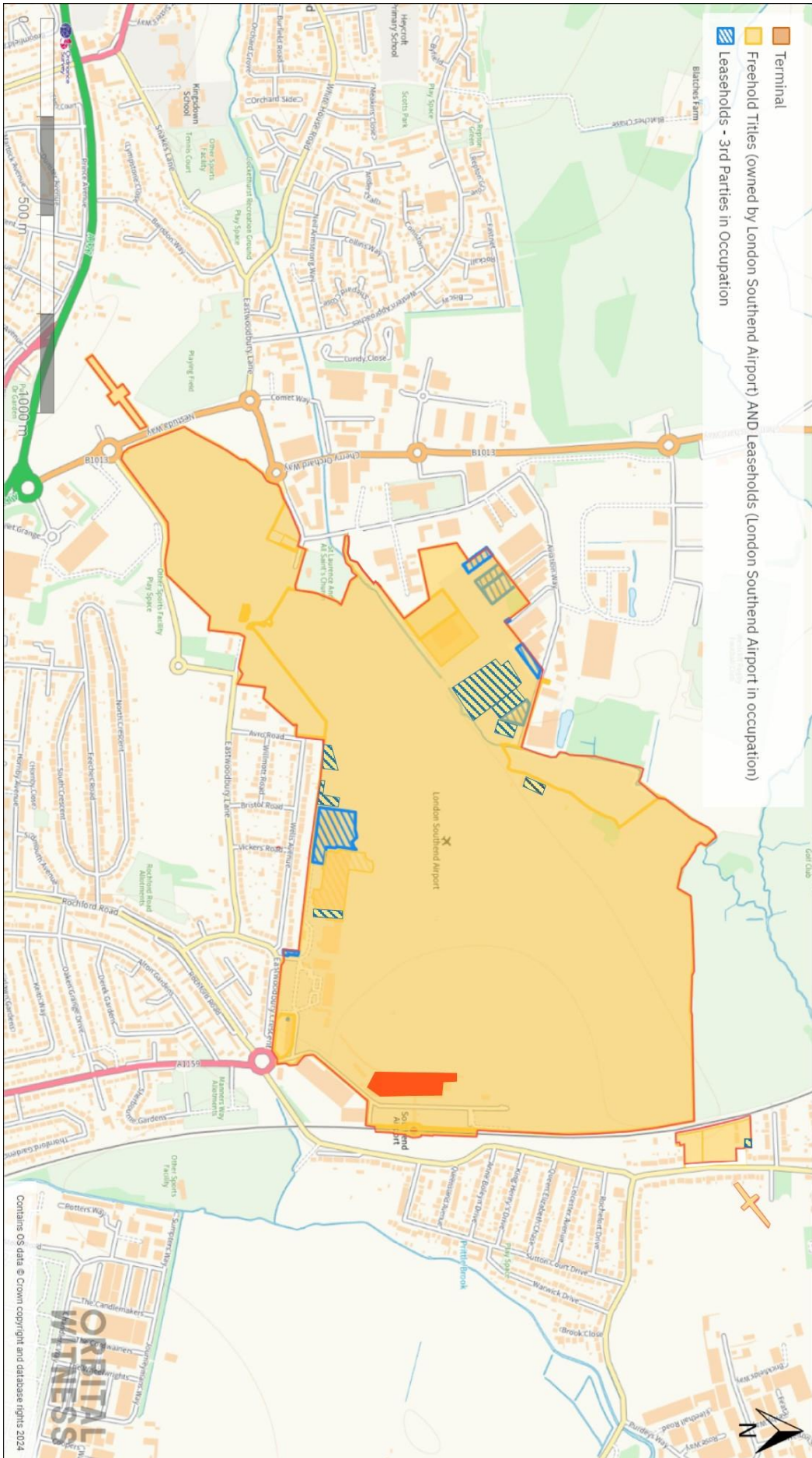
The Second Claimant

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 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 (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@londonsouthendairport.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 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

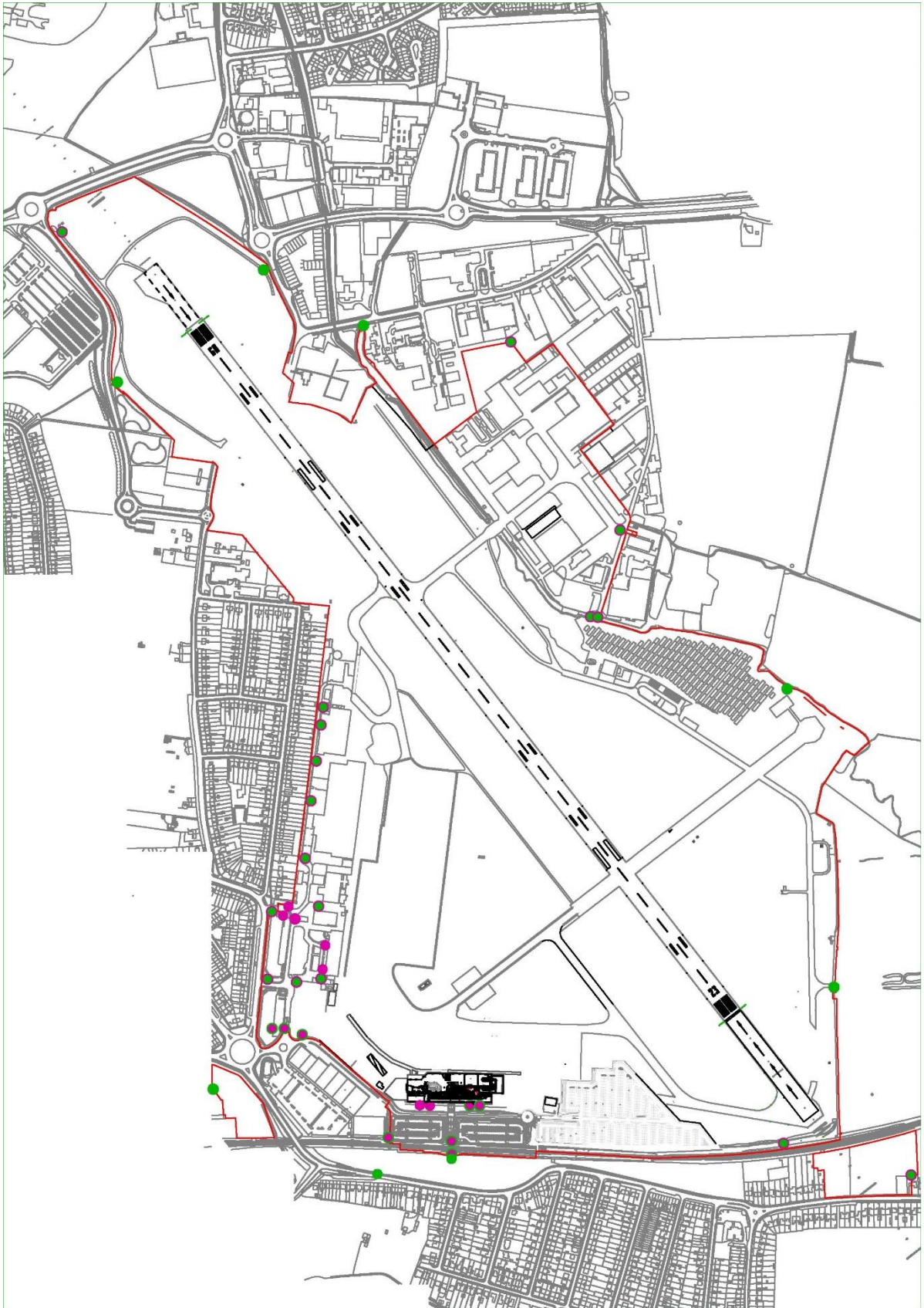
SCHEDULE 1 – CLAIMANTS’ UNDERTAKINGS TO THE COURT

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 3 – EMAIL ADDRESSES

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

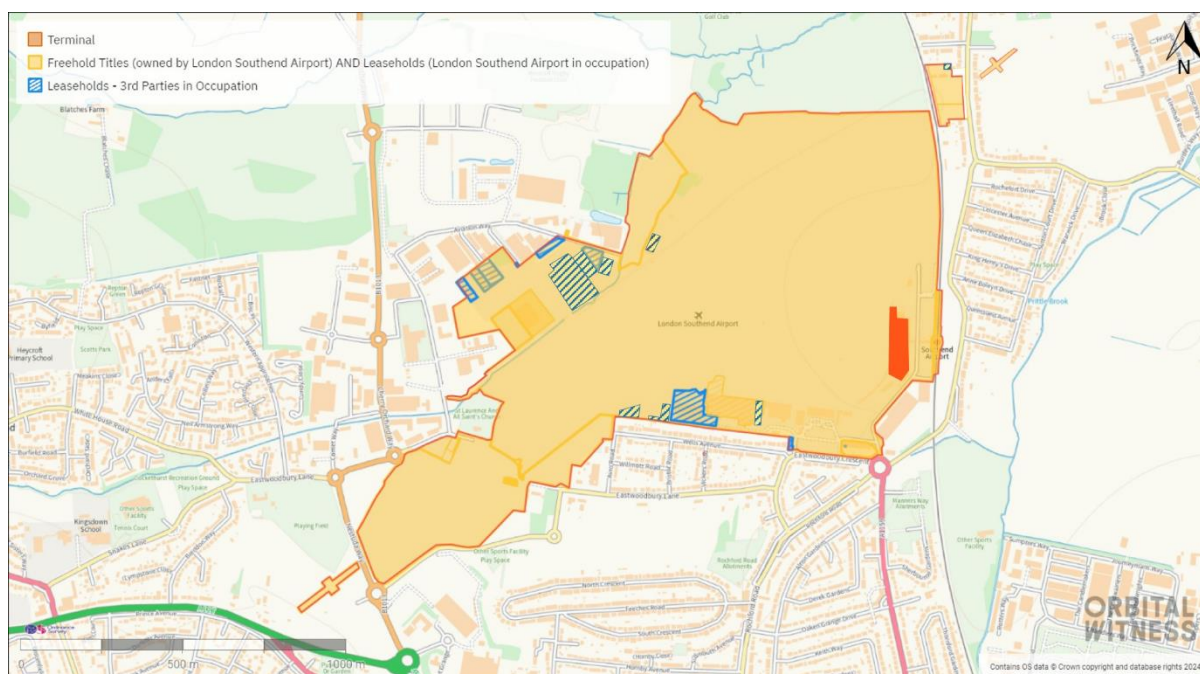
SCHEDULE 4 – PLAN B



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://londonsouthendairport.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.

IN THE HIGH COURT OF JUSTICE

Claim No.: KB-2024-002596

KINGS BENCH DIVISION

Before His Honour Judge Freedman (Sitting as a Judge of the High Court)

On: 22 October 2025

BETWEEN:

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



-and-

KB-2024-002596

**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 dated 6 October 2025; (ii) the Second Witness Statement of Marc Taylor dated 6 October 2025; and (iii) the Second Witness Statement of Philip Keith Spencer dated 16 October 2025

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: 22 October 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

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 '**Injunction Renewal Hearing**' in this matter has been listed for:

2nd July 2026 for 1½ hours before a High Court Judge, in person.

The Judge and time of the hearing will be confirmed on the working day before on the Daily Cause List (from 3pm):

<https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list#kings-bench-judges-daily-cause-list>

Please treat this email as a formal listing notice.

Please forward 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



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Made on behalf of the Claimants
Witness: Philip Keith Spencer
Number of Statement: Third
Exhibit: PS3
Dated: 17 June 2026

IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002596

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

THIRD 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 third witness statement in these proceedings. I make it in support of Southend's position at the second annual review hearing of the Injunction (defined below), listed to be heard on 2 July 2026.

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 Southend and are true to the best of my knowledge and belief.
4. I refer to a paginated bundle of documents, attached as Exhibit “PS3”. Where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit “PS3”.
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) or repeat the contents of such statements. 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:
 - 5.1. Akhil Markanday, Bryan Cave Leighton Paisner, Governor’s House, 5 Laurence Pountney Hill, London EC4R 0BR (akhil.markanday@bclplaw.com) / +44 20 3400 4344; and
 - 5.2. Phil Spencer, Bryan Cave Leighton Paisner, Governor’s House, 5 Laurence Pountney Hill, London EC4R 0BR (phil.spencer@bclplaw.com) / +44 20 3400 3119.

I. INTRODUCTION

6. These proceedings concern the injunction order granted by Mrs Justice Farbey on 14 August 2024 (the “**Injunction**”). The background to the Injunction is as set out in my previous witness statement dated 6 October 2025 (“**Spencer 1**”) at paragraphs 7 to 10. Pursuant to paragraph 3 of the Injunction, the Injunction is to be reviewed annually and falls to be reviewed for the second time at a hearing listed for 2 July 2026.
7. The first annual review of the Injunction was conducted at a hearing on 22 October 2025. His Honour Judge Freedman (Sitting as a Judge of the High Court) ordered that the Injunction remain in full force and effect subject to (i) an amendment to paragraph 3 of the Injunction (with the effect that Southend may contact the Court to request a review hearing not less than 28 days before the date when the Injunction is due to lapse, rather than Southend being required to submit a court application to request a review hearing); and (ii) further annual review thereafter in accordance with paragraph 3 of the Injunction (the “**First Review Order**”).
8. Southend seeks continuation of the Injunction. I make this witness statement in support of that position.

II. PROCEEDINGS AGAINST PERSONS UNKNOWN

9. 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’.
10. 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

Effectiveness of the Injunction

11. Southend's position is that the risk of unlawful direct action activities being directed at Southend by JSO (including potentially under the guise of a new activist organisation) or other environmental campaigners has not abated since the Injunction was granted. I do not repeat in this statement the reasons for Southend originally seeking the Injunction, which are covered in the First Witness Statement of Akhil Markanday dated 9 August 2024 ("**Markanday 1**") and the reasons for the grant of the Injunction which are recorded in the *ex tempore* judgment of Mrs Justice Farbey (**PS3/3-20**).
12. Since the grant of the Injunction, there have been no breaches of it. Whilst primarily a matter for submissions, Southend believes that the lack of direct action against the Airport since the grant of the Injunction demonstrates the success of it in deterring such activities. Notwithstanding the apparent success of the Injunction, Southend believes (as set out in greater detail below) that the underlying risk of unlawful direct action against the Airport remains unchanged and would be heightened were the Injunction not renewed.

Current status of JSO

13. As outlined in greater detail in Spencer 1 (paragraphs 24 to 29), JSO announced on 27 March 2025 on its website that it would be "*hanging up the hi vis*" following the government meeting its initial demand to end new oil and gas by making this government policy. On 18 May 2025, however, GB News reported that JSO were planning on making a comeback. Those reports were seemingly confirmed by an email sent from JSO to London City Airport's solicitor last year on 24 June 2025 stating, in response to the article, that "*GB News was right for once*" and that JSO are "*plotting a very big comeback*".
14. I have no reason to believe JSO have resiled from this position. Whilst their website and social media presence has been relatively subdued since last year, I do not believe that can be taken to indicate they may not still "plot a comeback". This is particularly so in circumstances where attention to their activities might

have been diminished over the past year and organisations may have been tempted to “lower their guard” against JSO. I am instructed by Southend that they do not believe they can run such a risk.

15. I also note that the Injunction was originally granted in the context of JSO threatening to cause “*a summer of chaos*”. To the best of my knowledge, summer remains an attractive target to disrupt aviation every year, due to it being a busy period for air travel in the summer holiday period.
16. It might also be that JSO had in mind a “comeback” by way of a new civil resistance group called “Take Back Power” (“**TBP**”). The landing page for JSO’s website states “*!! NEW PROJECT ALERT !!*” and refers website visitors to TBP’s own website, “*Join us at: takebackpower.net*”. A screenshot of the landing page from JSO’s website is at **PS3/21**. It therefore appears that TBP is a project under the JSO ‘umbrella’, and in any case a movement which involves present or former members of JSO.
17. The landing page for Youth Demand’s website (who were previously described by the press as “JSO 2.0” – see further in Spencer 1 paragraphs 31 to 33) also directs visitors to TBP’s website, displaying the same message as JSO’s website: **PS3/22**.

Take Back Power

18. According to TBP’s website, TBP’s demand of the UK government is to institute a ‘House of the People’ with powers to tax the super-rich, in order to fix Britain (**PS3/23**). Whilst this is TBP’s primary demand, their website indicates that environmental policy is also one of its concerns. The landing page of its website states “[the super rich] *profit from [...] heating the world to boiling point.*” (**PS3/23**).
19. On the ‘About us’ page of TBP’s website, TBP specifically refer to the success of JSO’s direct action activities. There is listed a series of questions and answers about TBP’s activities. One question asks “*Why does Take Back Power engage in disruptive direct action?*”; the response states “*history shows us that disruption is a necessary part of social change. Disruption action [...] saw the demand of*

Just Stop Oil become government policy” (PS3/24). This may suggest that TBP may be planning similar tactics to JSO in connection with a professed cause at least in part related to environmental issues, posing a continued threat to Southend.

20. TBP’s direct action activities, since seemingly forming in December 2025, have included:

20.1. **2 December 2025:** Depositing a pile of manure in the Ritz Hotel (a press article from TBP’s website is at **PS3/25-27**);

20.2. **30 April 2026:** Occupying and protesting at a Ferrari dealership in Berkeley Square and luxury department store, Harrod’s (**PS3/28-31**); and

20.3. **1 May 2026:** Orchestrating several activities across London which included (i) openly stealing produce from a supermarket; (ii) occupying and protesting at luxury department store, Liberty, on Regent Street in London and (iii) disrupting access to the luxury hotel Claridge’s (**PS3/32-35**).

21. In its latest press release, TBP state *“Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich” (PS3/35).*

22. Whilst the target of TBP’s direct action activities mentions the “super-rich”, and its direct action activities to date appear to have targeted the luxury retail sector, Southend considers that TBP’s existence poses a real risk of direct action against the Airport given: (i) TBP’s apparent connection to JSO; (ii) the fact that commercial airlines (and their ultimate owners) which operate from Southend are likely to be a potential target of demonstrations given their status as high-profile commercial entities (and therefore perceived affiliation with the “super-rich”) and their consumption of oil; (iii) the fact that private aviation – used by the wealthy – also operates at the Airport, in particular the Airport’s Jet Centre regularly handles high-profile people and flights; (iv) the fact that the Airport regularly hosts the RAF Red Arrows and RAF Typhoon jet fighter aircraft as well as high

profile aviation events including the Battle of Britain Memorial Flight and other airshows; and (v) the fact that the Airport is also a home base to the joint OSRL (Oil Spill Response Limited) marked Boeing 727 Aircraft, which is operated and paid for by the UK oil industry, making it a potential target for ‘fossil fuel’ activists. These factors are discussed in further detail in the third witness statement of Marc Taylor, which I have had sight of.

Other environmental / climate campaign groups

23. Irrespective of JSO’s specific activities, as previously set out in Spencer 1 paragraphs 24 to 29, Southend believes that there remains a threat posed by other environmental campaign groups such as Fossil Free London (“**FFL**”), Extinction Rebellion and Shut the System. I set out below an update on the activities of those groups.

FFL

24. FFL have recently staged a number of protests directed at the oil and gas sector, including a demonstration outside Shell’s London Headquarters on 6 May 2026 (see article at **PS3/36-37**) and a demonstration at Equinor’s London offices on 5 May 2026 (see press release: “*PHOTOCALL: Body bags piled outside Equinor as Q1 profit spike expected from Iran war*” **PS3/38**).

Extinction Rebellion

25. Extinction Rebellion remains an active group. In a recent article published on its website on 14 May 2026 it wrote:

“The path from spring to summer has a beautiful way of revealing what has been gaining strength invisibly.

Roots grow underground long before anything breaks the surface. Networks form quietly beneath hard ground. By the time the first shoots appear, the real work has already been happening for months.

Something similar can be felt across Britain’s protest movements now.” (See article from Extinction Rebellion’s website at **PS3/39-45**).

26. Whilst Extinction Rebellion’s message in this article is not clear, the article arguably implies that protest action may be planned for this summer and that environmental activist groups have been “*gaining strength invisibly*”. The article also goes on to refer to a protestor demonstration held at RAF Lakenheath in April this year in which direct actions organised by Lakenheath Alliance for Peace involved a week-long camp at the RAF base, showing that aviation sites remain a target of protestor action (although this specific demonstration appears to have been due to use of the base in connection with the US/Israeli wars in West Asia and North Africa).

Shut the System

27. Shut the System also remains an active group. Its recent activities have included targeting a supplier of the energy company Drax with slingshot rocks (April 2026) and using tools to attempt to cut into the workshop of Elbit, a defence and aerospace company, in Leicester and Wolverhampton, targeting the machines used to make F35 fighter jets (April 2026). As explained in my previous statement Spencer 1 (paragraph 55), it remains a concern that Shut the System’s specific mission is to target property and machinery in its activities. In a post on its Instagram account in April 2025, it said “*Our strategy is to disable the physical infrastructure of significant carbon emitters [...]*” (PS3/46). This indicates Airport infrastructure could be a target.

Objections to private aviation

28. Private aviation has previously been, and remains, a prime target for environmental activist protests. For example, both Oxford Airport and Inverness Airport were previously targeted by Extinction Rebellion last year for protests against private jets (as explained further in paragraph 39 of my first witness statement) and, in 2024, a private jet at Stansted Airport was sprayed with orange paint.
29. A Greenpeace article published recently on 10 June 2026 has also called for the grounding of private jets (see PS3/47-55): “*Ground private jets and mega-yachts before grounding ordinary people*”, suggesting that environmental groups may have their sights set on private aviation in particular at the moment, especially

due to the ‘fuel crisis’ resulting from the conflict in the Middle East. Southend therefore believes it may be particularly vulnerable due to the profile of its Jet Centre which services private aviation and which continues to grow (as explained further in the third witness statement of Marc Taylor).

30. In conclusion, therefore, Southend believes that it is justified in considering that:

30.1. There remain active groups, the identity of persons within them unknown, who wish and intend to use unlawful ‘direct action’ (including of the nature currently restrained by the Injunction) to further their causes.

30.2. The environmental causes which underpinned JSO’s proposed “summer of action” leading to the original Injunction remain strongly felt by a considerable number of such persons. Prominent in such beliefs is an objection to the aviation sector.

30.3. Even to the extent that some such persons might now also be focussing on issues of social inequality / the concentration of wealth amongst the ‘super-rich’, it is plain that a perception of the adverse environmental impacts of such issues remain an important feature of such wider concerns.

30.4. In the circumstances, the Airport is likely to remain a high-profile and attractive target for unlawful direct-action activities.

30.5. The likely inference to be drawn is that the cessation of direct-action protests at the Airport is a reflection of the success of the Injunction (including wide-spread awareness of it by those who might otherwise be minded to engage in such activities), rather than any material reduction in the underlying risk of such activities occurring absent an injunction.

IV. THE APPROACH OF OTHER AIRPORTS

31. As at the time of this statement, I understand that Southend are the second airport Claimant entity to have a hearing listed for their second annual review hearing seeking to continue their injunction.

32. A group of airports being represented together (London City Airport, Manchester Airport, Stansted Airport, East Midlands Airport, Leeds Bradford Airport, Luton Airport, Newcastle Airport, Birmingham Airport, Bristol Airport and Liverpool Airport) have a hearing set for 30 June 2026 (see, for example, London City Airport’s notice (**PS3/56**)).
33. London Heathrow Airport also has an injunction in similar terms to Southend and a renewal hearing is set for 9 July 2026 (**PS3/57-58**).
34. It therefore appears that other major UK airports consider that their injunctions should be renewed to restrain the on-going threat posed by the Defendants.

V. PROCEDURAL AND OTHER MATTERS

Service of the Previous Order

35. I can confirm that the First Review Order was notified to the Defendants in accordance with paragraphs 9 and 10 of the Injunction by the taking of the following steps:
 - 35.1. A copy of the First Review Order was uploaded to <https://londonsouthendairport.com/corporate/injunction/> on 30 October 2025; and
 - 35.2. A copy of the First Review Order was emailed to JSO to the email addresses listed at Schedule 3 to the Injunction at 10:40 on 30 October 2025.

Notice of the Review Hearing

36. On 18 May 2026 the KB Judges Listing Office emailed BCLP informing BCLP that the second review hearing had been listed for 2 July 2026 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 **PS3/59**.
37. On 9 June 2026, Southend added details of the review hearing on <https://londonsouthendairport.com/corporate/injunction/>. On or prior to Wednesday 17 June 2026, Southend will take further steps to bring the hearing to

the attention of all Defendants and notify them of this evidence in support in the manner provided for in the Injunction. Confirmation that, and how that, has been done will be provided in a further witness statement to be filed prior to the hearing.

Cross-Undertaking in Damages

38. 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

39. 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.

VI. CONCLUSION

40. Southend obtained the Injunction following a high-profile campaign of threatened action against airports by JSO.
41. Although JSO do not appear to have taken any further action since the announcement made on their website on 27 March 2025, it appears that the new campaign group TBP has links to JSO, as well as Youth Demand (which has been described as “JSO 2.0”).
42. Direct action with an environmental angle, from TBP or others, remains an active threat.
43. Of particular concern is that Shut the System’s activities continue to involve targeting property and machinery and therefore continue to suggest a potential shift from mere activist disruption to the physical sabotaging of operations. If so, the consequences of potential action at UK airports are likely to be more severe.

44. It is for these reasons that Southend's position is that the Court should continue the Injunction in its current form, 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:
Philip Spencer
656A85CC3CB44E1.....

Philip Keith Spencer

17 June 2026

Made on behalf of the Claimant
Witness: Philip Keith Spencer
Number of Statement: 3
Dated: 17 June 2026
Exhibit "PS3"

Claim No. KB-2024-002596

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

EXHIBIT "PS3"

This is the exhibit marked "PS3" referred to in the Witness Statement of Philip Keith Spencer dated 17 June 2026.

Tab	Document	Date	Page Number
1	Ex Tempore Judgment of Mrs Justice Farbey	14 August 2024	3 - 20
2	Screenshot of Just Stop Oil Website - Landing Page	12 June 2026	21
3	Screenshot of Youth Demand Website - Landing Page	12 June 2026	22
4	Screenshot of Take Back Power Website - Landing Page	12 June 2026	23
5	Screenshot of Take Back Power Website - About Us	12 June 2026	24
6	Take Back Power Article - The Ritz	03 December 2025	25 - 27

7	Take Back Power Article - Playgrounds of the super-rich	30 April 2026	28 - 31
8	Take Back Power Article - Essential Items	01 May 2026	32 - 35
9	Morning Star Article - Fossil Free London demonstration outside Shell	06 May 2026	36 - 37
10	Fossil Free London Article - Equinor demonstration	Undated	38
11	Extinction Rebellion UK Article	14 May 2026	39 - 45
12	Shut the System - Instagram Post	16 April 2025	46
13	Greenpeace Article - Six Radical Ideas	10 June 2026	47 - 55
14	London City Airport - Injunction Renewal Notice	12 June 2026	56
15	Heathrow Airport - Injunction Renewal Notice	16 June 2026	57 - 58
16	Notice of listing in respect of review hearing	18 May 2026	59

B E T W E E N:

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

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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 the, 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.

!! NEW PROJECT ALERT !!

The rich are killing us. To stop them and fix our broken country we need to...



Join us at: takebackpower.net

3 PEOPLE ARE IN PRISON RIGHT NOW FOR DOING EVERYTHING THEY CAN TO LIMIT CLIMATE CATASTROPHE.



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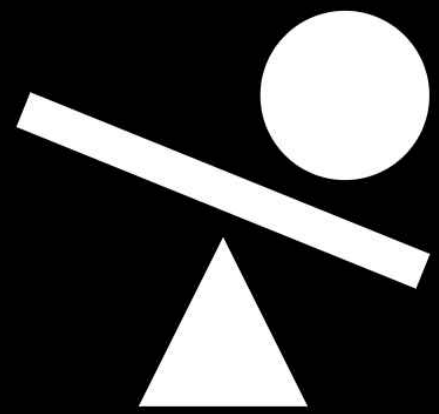
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YOUNG PEOPLE ARE RESISTING

HELP US GROW THE RESISTANCE

[DONATE TO FUND RESISTANCE](#)

Tax the rich to fix Britain!



Britain is broken because the super rich are pocketing billions, whilst ordinary people struggle to get by. They are the reason we have kids going to bed hungry, unaffordable homes and shit in our rivers. They profit from killing children in Gaza and heating the world to boiling point. We feel powerless to change things, because they corrupt our politics and own our media.

It's time to **Take Back Power**. Why should the rich pay a lower tax rate than the hard working majority? We need ordinary people to decide how to tax extreme wealth, with a citizen-led assembly.

Join us to demand a permanent House of the People with powers to tax the rich and fix Britain.

Upcoming events

+ What is the House of the People?

+ What would the House of the People do?

+ Has an institution like this existed before?

+ Don't the super-rich already pay too much tax?

+ How rich are we talking about here?

+ How bad is inequality in the UK?

+ What sort of tax would you like to see?

+ Even if you tax the rich it won't be enough to fix Britain will it?

+ How would you spend the money raised?

- Why does Take Back Power engage in disruptive direct action?

Nobody likes disruption, least of all the people disrupting, however history shows us that disruption is a necessary part of social change. Disruptive direct action brought us livable working conditions, the weekend, universal suffrage, and civil rights for marginalised communities. More recently, it saw the demand of Just Stop Oil become government policy. The evidence is clear that though people may not like the messenger, or the method of delivery, they hear the message. Ultimately this leads to political pressure and eventual social change. You can read more about how this works [here](#).

+ How is Take Back Power funded?

+ How can I get involved?

+ Do you have reading list?

'Inequality is shit' — Take Back Power deliver crappy Christmas for the Ritz

[December 3, 2025](#)



Three supporters of Take Back Power have delivered a pile of shit to the Ritz. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen's assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 12:05 today, three Take Back Power supporters deposited a pile of manure below the Christmas tree at the iconic luxury hotel. The three were quickly removed from the lobby and then held signs outside the entrance which read: 'INEQUALITY IS SHIT' & 'TAX THE RICH'.

A Take Back Power spokesperson said:

"The super-rich have more than doubled their wealth since the pandemic, while this Christmas, a third of UK children suffer and grow up in poverty. It's time ordinary people- those most affected by inequality, get a say in deciding how to tax wealth through the means of a legally binding citizen's assembly- a House of the People." [2][3]

One of those taking action today, Ellen Redwood-Brown, 23, an NHS worker, said:

"The billionaires, corporations, and corrupt politicians running Britain don't care about us. While working in the NHS I've seen people dying because they couldn't get appointments whilst doctors are working 15 hour shifts."

"The UK has 156 billionaires. We could take away 75% of that wealth to fix Britain and we'd still have 156 billionaires. We must let ordinary people decide how to tax the rich." [4]



Also taking action today is Tom Barber, 65, a former doctor, journalist and community worker from Nottingham, who said:

“Power is concentrated in the hands of a small group of obscenely wealthy and ruthless individuals. They are hell-bent on enriching themselves, forcing the gap between the haves and the have-nots ever wider.”

“Everyday people must Take Back Power, compelling our government to create a permanent citizens’ assembly- a House of the People. Only then can we start making decisions for everyone’s benefit- taxing the rich, creating a fairer society and restoring our faith in our democracy.”

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen’s assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at [TakeBackPower.net](https://takebackpower.net).

ENDS

Press contact: 07762 987334

Press email: press@takebackpower.net

High quality images & video here: [Public](#)

Website: <https://takebackpower.net/>

Bluesky- <https://bsky.app/profile/takebackpower.bsky.social>

Facebook: <https://www.facebook.com/profile.php?id=61582897002194>

Instagram: https://www.instagram.com/takeback_power/

X: https://x.com/takeback_power

Youtube: <https://www.youtube.com/channel/UCmhBfv2Iso6NCNF3I8BuuWg>

Take Back Power 'take over' the playgrounds of the super-rich

April 30, 2026



Take Back Power supporters have been 'taking over' the playgrounds of the super-rich this morning. Take Back Power is a nonviolent campaign, demanding a tax on extreme wealth, to be decided by a 'House of the People.' [1]

At around 10 this morning, 22 Take Back Power supporters occupied a Ferrari dealership in Berkeley Square, they could be heard chanting "WE DEMAND EQUALITY!" and "THE BILLIONAIRES HAVE GOT TO GO!". By around 10:30 the group left the store.

At around 11:30, the group reconvened at Burlington Arcade- the world's first modern shopping mall, which positions itself as an 'elegant and exclusive upmarket shopping venue'. The group could be seen holding signs which read "HOUSE OF THE PEOPLE" and "4 MILLION KIDS IN POVERTY", which were quickly seized by door staff.

By around 12:20, the group had moved on to the food hall at the luxury department store, Harrod's. Security was much more reactive, dragging Take Back Power supporters from the building.

A Take Back Power spokesperson said:

"This country is in crisis and everyone knows it! The people to blame are the corporations and super-rich who are extracting every last penny from working people, and then using their ownership of the media to distract people into blaming the poor and migrants. Nothing short of a massive transfer of wealth and power away from the 1% and back to working people can hope to fix Britain. Join us at takebackpower.net."



One of those taking action today is Robert Pembroke, 43, a builder and dad from Devon, who said:

It's time ordinary people take back our power from the super-rich. Inequality is spiralling out of control, 50 families in the UK hold more wealth than 50% of the country. Around the world, it's even worse with eight men holding more wealth than 50% of the world's population!"

*"It is obscene to allow this, people are dying. We need ordinary people, taking part in a permanent citizens' assembly- a **House of the People** deciding how to tackle this. To find out more go to takebackpower.net."*



Also taking action today is Ana Heyatawin, 63, a grandmother from Somerset, who said:

"Inequality, which is being imposed on ordinary people by big business, billionaires and the politicians who work for them, is killing people right now. More than a third of people in the UK now don't earn enough to buy life's essentials."

*"We need ordinary people at the heart of deciding how to tax extreme wealth to begin fixing this mess. This is why we are calling for a permanent citizen's assembly, with the power to tax extreme wealth- a **House of the People**."*

It's time working people take back our power from the super-rich. This is why Take Back Power is demanding that the UK government establish a permanent **House of the People**— a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at [TakeBackPower.net](https://takebackpower.net).

ENDS

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Instagram: <https://www.instagram.com/takeback.power/>

X: https://x.com/takeback_power

Youtube: <https://www.youtube.com/@take.backpower>

TikTok: <https://www.tiktok.com/@takeback.power>

Notes to Editors

[1] [Take Back Power](#) is a nonviolent civil resistance group in the UK. We aim to put the 99% in charge through citizens' assemblies. We are ordinary people from all walks of life who believe that in order to fix Britain, we have to tax the rich. And we don't think the rich should get a veto. We want the people to decide how we tax the rich through a legally-binding citizen's assembly — A House of the People. It's time for the 99% to have 99% of a say!

Join us to demand a permanent House of the People with powers to tax the rich and fix Britain.

Take Back Power supporters redistribute essential items whilst occupying high-end stores and hotels

May 1, 2026



Take Back Power supporters have been occupying the playgrounds of the wealthy this morning, and have liberated items from a superstore to redistribute them back to the communities that need them. Take Back Power is a nonviolent campaign, demanding a tax on extreme wealth, to be decided by a **'House of the People.'** [1]

At around 9 this morning, three Take Back Power supporters entered the Tesco Extra on Acre Lane in Brixton, and took essential items from the shelves and left without paying. The action takers then donated the items at a local food-bank drop-off point. At around 10am, all three attempted to hand themselves in at Brixton Police Station. So far none have been arrested.

At 11:45, around a further 18 Take Back Power supporters occupied the luxury department store Liberty, on Regent Street in London. They could be seen holding signs which read '3 MILLION HOUSEHOLDS SKIPPING MEALS' and 'TAX THE SUPER-RICH NOW.'

At around 1pm, this group then reconvened, disrupting access to the luxury hotel, Claridges. The group could be heard chanting "WE DEMAND EQUALITY!" and 'HOW DO WE TAX THE SUPER RICH?- A HOUSE OF THE PEOPLE!' as security attempted to move the supporters away from the door.

A Take Back Power spokesperson said:

*"Take Back Power is calling for an emergency **'House of the People'** to deal with the cost of living crisis. When politicians are too busy lining their pockets to fix our problems, we need the people most impacted to have a seat at the table. A **House of the People** selected by democratic lottery, like a jury, is a no-brainer solution to cut out the corruption and decide how to redistribute wealth."*



One of those taking action redistributing food today is Moshe Dixon, 25, from Dundee said:

“My mother came from poverty and fought tooth and nail to give me a better future. Like so many mothers she was promised that hard work would be rewarded, yet we are living in a country where so many families can’t make ends meet despite working multiple jobs.”

“6.5 million people had to turn to foodbanks in 2024. Meanwhile the CEO of Tesco is taking home 430 times the pay of the average Tesco employee, and the rich are paying a smaller share of tax than working people. We need an assembly of ordinary people coming together to decide how to tax extreme wealth in order to fix our broken country. Join us at takebackpower.net.”



Also taking action today occupying high-end stores and hotels, is Hannah McDonald, 20, a student from Liverpool, who said:

“Fourteen million people last year were faced with the prospect of going hungry, in this, the 6th richest nation on earth! Now we have a cost of living tsunami on the way and the government is nowhere to be seen.”

*“This is broken Britain. We need a **House of the People**— an assembly with real power, where ordinary mums, nurses, posties & cleaners, get a real say in how to take back our power from the super rich, and redistribute that wealth and power back to working people.”*

Today’s actions come as the UK braces for food shortages and soaring prices as a result of the war in Iran, as rising fuel, fertiliser and commodity prices begin to feed into business costs. [2]

It's time we take on the super-rich who are profiteering from a world in crisis. This is why Take Back Power is demanding that the UK government establish an emergency **House of the People**— a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at [TakeBackPower.net](https://takebackpower.net).

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Join us to demand a permanent House of the People with powers to tax the rich and fix Britain.

[2] <https://www.telegraph.co.uk/business/2026/04/28/full-force-of-iran-war-hit-food-prices-soon-supermarkets/>



Fossil Fuel / 6 May 2026

Fossil Free London pours fake blood outside Shell offices as it ‘makes a killing’ from the Iran war



M Fossil Free London campaigners protest outside Shell's London headquarters against its giant profits from the Iran war [Pic: Fossil Free London]



FOSSIL Free London activists covered themselves in fake blood as they sat outside Shell’s London headquarters wrapped in a fuel pump today.

They erected a banner that read “BLOOD MONEY: No new oil & gas” amid expectations the fossil fuel giant will announce bumper quarterly profits today thanks to the Iran war.

Fossil Free London spokesperson Robin Wells said: “In these past few years, as our world becomes more unstable and the realities of climate breakdown set in, it’s never been clearer: Big Oil profits from, and locks in, mass death.

“And we’re feeling this so rawly right now. As we see thousands slaughtered in Iran and weep alongside those mothers who will never hold their children again, Shell is making a killing.”

More than 2,000 people have been killed by the US and Israel’s war in Iran, which has sent oil prices soaring due to a blockade on the Strait of Hormuz.

Shell was contacted for comment.



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FØSSIL FREE LONDON

PHOTOCALL: Body bags piled outside Equinor as Q1 profit spike expected from Iran war

When: 8.15am, Tuesday 5th May

Where: Equinor Offices, W2 6BD

Details: Activists from Fossil Free London will pile several life-sized body bags outside the offices of Rosebank co-owner Equinor, as one campaigner dressed as an oil executive stands on top of them.

The protest comes as the UK Government's decision on whether to approve or reject the Rosebank oil field approaches.

Equinor's quarterly profits are **also expected to jump** when announced on Wednesday 6th May, amidst the US-Iran war.

Photos can be used in coverage of Equinor's quarterly profit announcement.

(We will also stage a stunt ahead of Shell's Q1 profit results on Wednesday the 6th at 8:15 a.m. outside Shell's HQ, we will send a separate photocall tomorrow.)

For further information, to find us on the day, or to organise an interview please contact campaigner@fossilfreelondon.org, or 020 3886 2590.

Notes:

1. For further information, please contact Rosie, 020 3886 2590, campaigner@fossilfreelondon.org.
2. Fossil Free London is a grassroots climate group that protests Big Oil and campaigns for a London beyond fossil fuels.
Instagram: [@fossilfreelondon](https://www.instagram.com/_@fossilfreelondon) Twitter: [@fossilfreeldn](https://twitter.com/_@fossilfreeldn).
3. Photos from other Fossil Free London actions are available [here](#) and can be used in your journalism at any time without prior permission. Please credit Fossil Free London.



THE AWAKENING: BEYOND THE WALL

May 14, 2026 by Extinction Rebellion

The path from spring to summer has a beautiful way of revealing what has been gaining strength invisibly.

Roots grow underground long before anything breaks the surface. Networks form quietly beneath hard ground. By the time the first shoots appear, the real work has already been happening for months.

Something similar can be felt across Britain's protest movements now.

At [RAF Lakenheath in April](#), peace campaigners gathered for a week-long camp opposing the return of US nuclear weapons to British soil and the use of British bases in

illegal wars in Palestine, Iran, Lebanon and beyond. There were workshops, overnight vigils, legal briefings, songs around camp and shared meals and stories. Older peace campaigners stood alongside younger climate and anti-war activists inheriting a world increasingly organised around militarisation, surveillance and permanent emergency.

The direct actions, organised by Lakenheath Alliance for Peace, began in earnest as it became clearer that the base is being used extensively for the US/Israeli wars in WANA (West Asia and North Africa). There were a total of 23 arrests – A group of 7 Christians, Muslims, Jews, Quakers and people of no faith group, together calling themselves Unity Against Genocide were arrested under the Terrorism Act while wearing tabards with individual words on them. When combined, their tabards read ‘WE OPPOSE GENOCIDE. WE SUPPORT PALESTINE ACTION’ – with only one word on each. Incredibly, the group carried out the same action at the Supreme Court in February this year without arrest.

There were 2 arrests at the Saturday police-liased blockade. 13 were arrested at the ‘surprise’ Monday blockade at the main gate. The lock-on to the CND symbol on the trailer, car lock-on and two road lock-ons happened at the main gate and at the same time 1 more person was arrested at the Lakenheath village gate where around 60 people did a stand up blockade.

A peace camp. A blockade. Arrests for nonviolent protest. These are recognisable acts within the long history of civil resistance in Britain.

And yet something can be felt, shifting.

Across climate movements, Palestine solidarity organising, peace campaigns and protest rights groups, people are recognising the same pattern unfolding around them.

Not of isolated incidents, but a political trajectory.



Defend Our Juries' Timeline of Corruption shows our interwoven tapestry. Fossil fuel corporations knowing for decades about climate collapse; lobbying networks and think tanks shaping anti-protest policy; Lord Walney acting as an “independent adviser” while connected to oil and arms interests; escalating restrictions on protest and legal defence; peaceful campaigners imprisoned while the industries driving destruction continue almost untouched.

In 2019 Extinction Rebellion emerged to tell the truth about systems placing profit above life itself and to pressure the government to act. It is clear that those systems do not only extract from ecosystems. They extract from communities, from democracy and from our collective ability to act together. The same concentrations of wealth and power driving climate collapse are also driving militarisation, border violence and attacks on civil liberties. The deepest scars of this system are borne by the Global South; they endure the most devastating impacts of a collapse fueled by others, the injustice of the relentless extraction of their resources and the theft of their autonomy.

THE WALL

When movements begin naming those connections clearly while reminding people of their agency, repression tends to follow; the same power that redacts the truth about

our collapsing ecosystems in secret reports is the power that sends nuclear bombs to our soil and attempts to silence the juries that might hold them accountable.

Next came the arrests for mere written words. In 2023, Trudi Warner stood quietly outside a courthouse holding a sign reminding jurors of their legal rights. She was arrested for it.



No obstruction, no threat, no violence: just a sentence on a card. Just the truth.

Trudi's sign, which read "Jurors: you have an absolute right to acquit a defendant according to your conscience", reflected a 300-year-old legal principle also written on a plaque on the Old Bailey. Her arrest shocked many people precisely because it exposed something larger than a single case. If even reminding jurors of their conscience could provoke arrest, then the boundary of acceptable dissent was moving rapidly. Defend Our Juries emerged from that moment of recognition, catalysed by outrage at Trudi's arrest.

And now that recognition is spreading further. We stand against the same machinery of suppression: hostile media narratives, politicised policing, corporate influence over public policy and expanding restrictions on protest.

They are building a wall of secrecy and fear between the government and the governed.

One of the most dangerous aspects of this moment has been the increasing weaponisation of antisemitism against movements opposing mass violence.

Antisemitism is real, deadly and rising along with wider fascism. Jewish communities deserve safety and protection everywhere, as do all people of any faith or none; but conflating opposition to the actions of the Israeli government with hatred of Jewish people does not challenge antisemitism, it begets it. It risks deepening division while allowing governments to criminalise protest, expand policing powers and suppress dissent under the language of public safety.

Movements for climate justice and global justice are not separate moral causes competing for attention. They are a response to the same underlying crisis: a political and economic system that concentrates power upwards while demanding silence from everyone living with the consequences.

We know a liveable future cannot be built through fear, secrecy and permanent war. It has to be rooted instead in mutual aid, democratic participation, public accountability and care. That threatens those who profit from extraction, militarisation and division because solidarity interrupts the cycles they depend upon.

And solidarity is exactly what is growing.

At places like Lakenheath, around shared food and stories, people are recognising one another properly. Not as isolated campaigns orbiting separate issues, but as communities defending the conditions that make collective life possible at all: truth, conscience, participation and the right to resist systems that place profit and power above human and ecological survival.

Spring works slowly. But once roots intertwine underground, it becomes much harder to build a wall over what eventually emerges.

LAKENHEATH FILM BY ZOE BROUGHTON AND VLAD MOROZOV

This beautifully made film follows the people behind the protest. Scientists, veterans, teachers, and ordinary citizens — asking a simple question: what does real security look like?



Watch on

WHAT HAPPENS NEXT?

Keep an eye on independent news sources, the story grows all the time:

On 23rd April, Trudi was one of nine people arrested for breaching a Section 14 order while again holding signs communicating the principle of jury equity outside a court. The same sign as in 2023 but this time Section 14 conditions forbidding protest within 1 mile of the court was used. The interesting legal argument to watch for will be whether silently holding a sign amounts to protest.

On 12th May came further evidence of the movement of boundaries within our judicial system. Four Palestine Action activists could be sentenced as terrorists. They were found guilty of criminal damage by a jury at Woolwich Crown Court in a retrial. The judge, Mr Justice Johnson, ruled before the first trial that there appeared to be a “terrorist connection” to the offences – even though they took place before Palestine Action was proscribed. The judge’s ruling was not disclosed to jurors in two trials so they convicted the four based on criminal damage, not knowing they could then be sentenced for terrorism. We now know that reporting restrictions prevented the whole truth being known.

This has never happened before in a criminal damage case.

WHAT CAN I DO?

Join Jury Support Day. NEXT MONDAY 18th May 2026 at a court near you.

If these topics leave you feeling despair, find communities in your accessible space, in person or online who are discussing how they feel about them and what we can all do, together.

Movements like ours can not achieve our demands without a democratic media, free from the control of the billionaire elite. Sign and share this Parliamentary Petition demanding that the government pass the Media Sovereignty Act.

Join the telegram chat for the Love & Rage weekender we have planned. 12-13 September. A long hot weekend of workshops and discussions with a creative finale, join and stay as long as you're able.

At the core of Extinction Rebellion's philosophy is Nonviolent Direct Action. It is built on a long history of successful civil disobedience campaigns, from Indian Independence to the British Suffragettes and the American Civil Rights Movement, and evidence of how nonviolent social movements can create change.

Extinction Rebellion's actions and campaigns focus on disrupting the seats of power because we are living in a time of Climate and Nature Emergency with our eco-system and society at risk of collapse in the sixth mass extinction.

Working with care, within our Principles & Values, we always have the same 3 demands which guide our focus:

TELL THE TRUTH
ACT NOW
DECIDE TOGETHER

With love and rage 🧡

FURTHER READING:

Jury Equity, the Filton 6 and the arrest of Trudi Warner by Jewish Voice for Liberation: www.jewishvoiceforlabour.org.uk/article/jury-equity-the-filton-6-and-the-arrest-of-trudi-warner/

Plane spotters camped outside Lakenheath air base witnessed how a British RAF base is being used by the US military to wage war on Iran:

www.telegraph.co.uk/news/2026/03/03/raf-lakenheath-plane-spotters-fighter-jets-iran-us-suffolk/



Posts

shut_the_system

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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 crisis 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 operations.

Without their property, assets, offices, wealth, physical tools and resources, banks, financiers and insurance companies will be forced to end all support for climate breakdown.

Unlike our targets, we are non-violent – we will never physically harm a person or living being.

We do not consider the destruction of machinery to be violence. We consider it necessary. We take the necessary steps to end their violence.

We are inspired by the militancy and radical tactics of the suffragette movement in the 20th century, the civil rights movement, land rights campaigners, workers struggles, the poll tax protesters, the anti-fascists who rebelled against Nazi rule, the animal liberation movement, independence struggles around the world, the radical movement for LGBT+ rights, the anti-apartheid movement, the peace movement, the struggle for a free Palestine and many of the historic campaigns that have brought us the safety, security and basic human rights we enjoy today.

We can't stand back and allow the world to crumble because of something completely preventable – because of the failures of the wealthy elite. We can't let apathy for the suffering of others pave the way for inaction. We can't live with ourselves knowing that the fate of humanity and life on Earth was jeopardised because we refused to address the machinery of industry and government.

Stories Energy | Social and Economic

Six radical ideas we need right now to end fossil fuel dependence and protect people from the war on Iran price shock



Mehdi Leman

10 Jun 2026 • 9 min read



How the war on Iran fuels an energy shock and cost of living crisis

It has been 100 days since the US and Israel launched their attacks on Iran on 28 February 2026, throwing the region into deeper violence and pushing up fuel, food and transport costs around the world. This war is a human tragedy that is deepening a global cost of living crisis in a world still dangerously dependent on oil and gas.

This blog sets out six concrete policy ideas governments can implement now to protect people from the Iran energy shock and accelerate the shift away from fossil fuels.

History shows that moments like this can also unlock transformative decisions. After the Second World War, governments created social safety nets and public health systems; the 1970s oil shocks led to fuel efficiency standards, strategic reserves and, in some countries, the birth of modern environmental policy. Today's overlapping crises

expose a fossil fuel system that can no longer sustain the society built on it.

1. Ground private jets and mega-yachts before grounding ordinary people



A large group of activists from Extinction Rebellion and Greenpeace Netherlands hold a peaceful protest at Amsterdam Schiphol Airport, the second biggest in the EU, stopping private jets from landing and taking off and sitting and cycling around the area where private jets are parked.

© Marten van Dijl / Greenpeace

If governments are genuinely worried about fuel shortages and high prices, they should start with the most pointless and polluting uses of oil. Private jets and superyachts are the purest form of luxury emissions: they burn staggering amounts of fuel per person and are used by a tiny elite, while everyone else is told to “tighten their belts”.

Jet fuel markets are already strained, and shipping routes have been upended by the war on Iran, driving up marine fuel costs. Restricting or temporarily banning private jets and megayachts, would relieve pressure on fuel markets at the margins, but more importantly it would send a clear signal about fairness: in an emergency, the first flights grounded should be private, not the holiday or family trips of ordinary people. Combined with

people before luxury emissions.

2. Make public transport free using war-profit taxes



Public transport scenery in Berlin during rush hour on a work day.

© Kevin McElvaney / Greenpeace

The transport sector is responsible for around 60% of total oil demand globally. If one conflict can send fuel and ticket prices soaring, the least governments can do is make it easier and cheaper for people to move without being held hostage by oil. A bold way to do that is time-bound free or ultra-cheap public transport, funded by taxes on fossil fuel war profits.

This is not a fantasy. Spain's free commuter rail, Germany's 9-euro ticket and Luxembourg's nationwide free transit all showed that cheap or free public transport boosts ridership, cuts car use and lowers emissions, while saving households money. In Brazil, more than 100 municipalities have rolled out Tarifa Zero schemes offering fare-free buses, and in India Delhi's "pink tickets" policy has made buses free for women, improving safety and access to jobs and education.

A permanent surtax on the profits of fossil fuel companies – whose

billions, enough to pay for several years of free buses, trains and trains. That would give people immediate cost-of-living relief, provide funds for public transport electrification at scale, and help new habits stick long after the crisis ends.

3. Ban fossil fuel and meat advertising



Greenpeace protesters erect a giant spoof billboard outside Shell’s HQ accusing them of fueling climate change and therefore complicity in last week’s devastating wildfires in Southern Europe as the company announced billions in profits from the last three months.

© Chris J Ratcliffe / Greenpeace

Every time there is a war or energy shock, fossil fuel companies run the same PR play. First they warn of an “unprecedented crisis”, then they present themselves as the only grown-ups in the room, and finally they spend millions on ads about “reliable energy” while lobbying quietly for more drilling, more subsidies and more delays to climate action.

Big meat and dairy corporations use a similar playbook: marketing meat-heavy diets as “normal” or even “healthy” while relying on highly polluting, methane-intensive factory farming and deforestation that turbocharge the climate crisis and biodiversity loss. It is time to treat fossil fuel and industrial meat advertising the way the world treated tobacco ads and start phasing it out.

upcoming FIFA World Cup 2026 in the US, Canada and Mexico, cultural institutions, “greenwashing” billboards and social media campaigns, as well as glossy ads that hide how meat giants are linked to forest destruction, land grabs and animal cruelty, would not cut emissions overnight. But it would strip the agribusiness and fossil fuel industries of one of their most powerful tools for buying social licence and political influence. Cities like Amsterdam, which has already moved to ban public adverts for meat and fossil fuels, show that this kind of rule is both possible and popular.

Several cities and regions have already moved to ban or restrict fossil ads. The war on Iran should be the moment to scale that up to national and international level and expand it to cover the most polluting forms of meat and dairy advertising too.

4. Cut plastic, cut oil: shift subsidies to reuse and refill systems



As world governments meet in Geneva for the Global Plastics Treaty Talks, Greenpeace activists create a symbolic trail of black oil and hang massive banners on the entrance of the Palais des Nations to call out the undue influence of the fossil fuel industry in the negotiations.

© Marie Jacquemin / Greenpeace

the cost of everyday goods that are made of plastic or wrapped in it rises too, from food packaging to household products. In Europe, the price of PET plastic used in soda bottles and other food packaging jumped by around 15% in a single year, while polyethylene prices in North America climbed by nearly 30%, piling extra pressure on families who are already struggling with higher bills.

Governments can use this moment to stop pouring public money into petrochemicals and plastic, and instead back reuse and refill systems that cut fossil fuel demand at the source. Redirecting petrochemical and plastic subsidies into community-centred reuse and refill infrastructure would support plastic-free, standardised packaging across consumer goods sectors, with local, accessible reverse-logistics that slash waste, resource use and emissions. Done right, this shift would also create sustainable jobs and reduce people's exposure to toxic chemicals and plastic pollution in their food, water and homes.

This is already starting to happen. In France, a new national, standardised reuse system backed by legislated reuse targets is rolling out reusable glass packaging for popular food and drink products across several regions. Ottawa in Canada is piloting a city-wide, multi-brand reuse project for personal and home-care products, and in Jakarta the Kecipir app links people directly with farmers using zero-waste packaging. With the right rules and funding, national governments can phase out petrochemical and plastic subsidies, set binding reuse and zero-waste targets, and empower local authorities and producer-responsibility schemes to design reuse-first systems that shorten supply chains, improve access and deliver real benefits to communities.

5. Build a Strategic Battery Reserve



Greenpeace East Asia and the China University of Mining and Technology jointly hosted a workshop on EV (Electric Vehicle) power battery recycling and reuse.

© Greenpeace

After the 1970s oil crisis, countries like the United States created Strategic Petroleum Reserves , and International Energy Agency (IEA) members agreed to hold at least 90 days of net oil imports in emergency stocks. Fifty years later, the war on Iran is screaming that one of the real security tools we now need is a strategic energy reserve built around renewables and storage, not more fossil fuels.

A Strategic Battery and Energy Storage Reserve would mean a strategic energy reserve connected to the grid, spread across regions, that can store surplus wind and solar power and step in when renewable supplies are disrupted, including large-scale battery systems in combination with other forms of storage such as pumped hydro, compressed air, thermal storage and flywheels.

A binding requirement on governments to hold a minimum level of grid-scale energy storage – for example, targets proportional to each country’s electricity demand or peak demand, with IEA member countries ramping up from today’s levels towards tens of gigawatt-hours of storage capacity over the next decade – would help keep the lights on during crises, stabilise grids day-to-day and provide a guaranteed market that drives storage manufacturing and deployment. Batteries are expected to provide the majority of new storage capacity in clean energy transitions, but other storage options

Ensuring the use of appropriate battery types can considerably reduce the amounts of key minerals needed, and combining batteries with other storage technologies can further cut material demand.

Countries like Spain and Italy already have storage targets, and at recent COP29 UN climate talks a group of governments pledged to increase global storage capacity sixfold by 2030.

China’s current “solar surplus” crisis shows what happens when grids and storage fail to keep pace with record-breaking renewable roll-out: without enough storage, clean power is wasted instead of replacing fossil fuels. At the same time, Ukraine’s experience with decentralised renewable energy during war has demonstrated that distributed solar and storage are a global security imperative, not just a climate solution, and many governments are now looking to learn from and fund this model. This crisis is the perfect reason to go from pledges to concrete storage reserve obligations.

6. Fix food security by breaking fertiliser addiction



A Greenpeace campaigner inspects plastic-wrapped fruit in a Hong Kong supermarket. Single-use plastic packaging like this keeps our food system hooked on oil, while synthetic fertilisers made from fossil fuels lock farmers into the same fragile, polluting system.

are dangerously dependent on fossil fuels, especially gas-based synthetic fertilisers. When fertiliser prices spike, farmers struggle to afford them and harvests are threatened, while Big Ag companies report record profits. A real solution is to fast-track ecologically sound and localised food systems based on food sovereignty and resilience, shifting to agroecology and fossil-free farming capable of surviving external shocks, either climactic or geopolitical. Agribusiness lobbyists use “food security” rhetoric to demand deregulation and subsidies whenever prices rise, even as fertiliser giants pocket windfall gains from crises like this one.

Instead of bailing them out, governments should foster food sovereignty and support farmers to cut synthetic fertiliser use, expand crop rotations, cover crops and nitrogen-fixing plants, cap factory farming and prioritise food over animal feed, while investing in local, ecological food systems.

Public food stockholding and smart supply-management tools can be more immediate actions that can stabilise prices, while emergency support goes directly to low- and middle-income families, not corporate balance sheets.

Why these ideas matter

On their own, none of these ideas will end the war on Iran or dismantle the fossil fuel system that made it so dangerous. Together, though, they point to a different kind of crisis response: one that protects people first, makes war profiteers pay, and treats renewables, public services and ecological farming as essential defenses, not optional extras.

The last 100 days have shown that making the world dependent on fossil fuels is a recipe for permanent instability and economic disruption. The next 100 days should be about doing something bolder than tinkering with tax rates and releasing a few more barrels of oil from emergency caverns.

The tools to build a fair, renewable-powered, war-resistant economy are already here. The question now is whether political leaders will finally use them.



Speed through security: leave your liquids in your bag, and please make sure they are 100ml or less.



London City Airport Injunction Order

On 20 June 2024 the High Court granted us an injunction, which prohibits anyone from entering, occupying or remaining on London City Airport in connection with the Just Stop Oil campaign (or any other environmental campaign) without our permission.

On 24 June 2025 the High Court extended the injunction

Anyone breaching the injunction might be imprisoned for up to 2 years, fined and / or have their assets seized for contempt of court.

Documents relating to the Injunction can be found on the links on this page.

Second Annual Review Hearing – 30.06.2026

The second annual review hearing for the injunction is set for 30 June 2026 before a High Court Judge at the Royal Courts of Justice, in person, at a time to be confirmed. The Judge and time of the hearing will be confirmed on the working day before on the Daily Cause List (from 3pm): <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list#kings-bench-judges-daily-cause-list>

All Years

Second Annual Review Hearing – 30.06.2026

First Witness Statement of Alex Wright dated 11 June 2026

Exhibits to First Witness Statement of Alex Wright dated 11 June 2026

Sealed Application Order dated 2 June 2026

Sealed Court Order dated 10 June 2026.

Review Hearing on 24.06.25

All Years

Injunction Order

Supplemental Hearing Bundle

Airports – chrono

Airports – skeleton

Airport Injunction Renewal

Original Hearing on 20.06.24

All Years

Injunction Order

Hearing Bundle

Skeleton Argument

Note of Hearing

Company / Local community

Injunction

Heathrow Airport Injunction

On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited.

Anyone breaching the injunction might be imprisoned for up to 2 years, fined and/or have their assets seized for contempt of court.

The second annual review hearing of the Injunction Order, 9 July 2026

The second annual review hearing of the Injunction granted on 9 July 2024 has been listed to be heard on 9 July 2026 at the High Court, Royal Courts of Justice.

The Judge and time of the hearing will be confirmed on the working day before on the Daily Cause List (from 3pm).

Pursuant to paragraph 3 of the Order of Mr Justice Julian Knowles dated 9 July 2024 (as varied pursuant to the Order of Mr Justice Turner dated 23 July 2025), the Claimant has filed with the Court the following evidence on which it intends to rely at the second annual review hearing, which is linked below, by way of service on the Defendants:

1. Third Witness Statement of Philip Keith Spencer dated 15 June 2026
2. Exhibit PS3

Further relevant documents in relation to the second annual review hearing will be posted here in due course.

1. [Philip Spencer Third Statement](#)
2. [Exhibit PS3](#)

The first annual review hearing of the Injunction Order – 23 July 2025

The first annual review hearing of the Injunction Order took place on 23 July 2025 at which the Injunction Order was continued by order of Mr Justice Turner.

The relevant documents are:

- [Review Hearing Bundle](#) (Large file: 38MB PDF)
- [Review Hearing Skeleton](#) (75.1KB PDF)
- [Mr Justice Turner – Order](#)

Documents relating to the injunction and the Hearing on 9 July 2024

Documents relating to the Injunction and the Hearing on 9 July 2024 can be obtained using the links below. The Bundle for Hearing contains the Claim Form, Application Notice and evidence in support.

Feedback

Injunction application

Dear all,

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

The '**Injunction Renewal Hearing**' in this matter has been listed for:

2nd July 2026 for **1½ hours** before a High Court Judge, in person.

The Judge and time of the hearing will be confirmed on the working day before on the Daily Cause List (from 3pm):

<https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list#kings-bench-judges-daily-cause-list>

Please treat this email as a formal listing notice.

Please forward 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 |

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Made on behalf of the Claimants
Witness: Marc Taylor
Number of Statement: Third
Exhibit: N/A
Dated: 17 June 2026

IN THE HIGH COURT OF JUSTICE

Claim No.: KB-2024-002596

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

THIRD 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 27 years. During my

tenure, I have also held the roles of Head of Asset Management, Operations Director and acting Deputy CEO. This is my third 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.

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 Claimants and are true to the best of my knowledge and belief.

6 I make this statement in relation to the second annual review hearing of the injunction granted by the Order of Farbey J, dated 14 August 2024 (the “**Injunction**”) that has been listed on 2nd July 2026. 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 Further to the information contained in my previous witness statements, here I am providing updates which I hope will assist the Court.

9 Since my last witness statement given in 2025, the Injunction has continued to be a proven deterrent and as such there has been no protest activity within the boundary of the Airport since its commencement. Operations at the

Airport have continued to grow – it is currently the UK’s fastest growing airport. I believe this makes the Airport a heightened target for disruptive activists. In particular:

- (a) This year, scheduled passenger numbers are expected to rise to approximately 960,000. Scheduled services remain largely leisure focused (and so any disruption would be particularly felt by families and holidaymakers already affected by events in the Middle East, who may have switched holiday destinations to short haul locations more likely to be served from the Airport).
- (b) This year there has also been a 133% increase in business and aviation charters, serving VIP clients and business individuals through our Jet Centre.
- (c) In the first quarter of 2026, the Airport has seen a passenger growth of 247% compared to last year, with approximately 87,000 passengers per month using the airport in May 2026. As a comparison, London’s five other airports recorded a collective growth of 1.5% in the year’s first quarter, while passenger numbers across the whole of the UK recorded an increase of 2.3%. The route network continues to expand, with 4 new leisure and city destinations added in 2026, taking the total number of routes to 30.
- (d) Core operational hours are still 03:30 to 23:30 daily.
- (e) The Jet Centre operation has increased its core hours this year. It is now open from 06.00 hrs to 02.30 hrs.
- (f) Our daily average revenue in May 2026 was estimated at £115,000 and is estimated to increase as the Summer schedule commences, so the impact of protest, potentially resulting in closure of the Airport, would incur a significant loss of revenue.

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. I also confirm that the plan of the Airport at Schedule 2 to the Injunction remains accurate.

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. I have also had sight of the third witness statement of Philip Keith Spencer of BCLP (“**Spencer 3**”) and refer the Court to the detail in that statement as to the continuing threat to the Airport posted by such environmental campaign groups, which Southend believes to exist.

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” still remain a very real threat, despite apparent lack of recent protest activity.

13 The figures I cite in paragraph 9 above show that the Airport and its Jet Centre continues to grow. There are expansion plans to develop the Airport further to allow the handling of more flights and passengers. In the last year, the Airport remains present in the media with its passenger figures now approaching a million. This is of particular concern to me in the context of activist groups who have signalled that they believe that private aviation should be banned (as further highlighted in Spencer 3), and I fear our Jet Centre may be a particular target.

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

- (a) The Jet Centre regularly handles numerous high-profile people and flights, including world famous celebrities, football teams and pop stars. This undoubtedly makes it desirable for various campaign groups to seek to disrupt its operations. Private aviation was targeted at Oxford Airport by Extinction Rebellion on 5th July 2025 and in 2024 at Stansted Airport when a private jet was sprayed with orange paint as it was thought to be used by a famous person.
- (b) The Airport regularly hosts the RAF Red Arrows, the Battle of Britain Memorial Flight and several active RAF Typhoon jet fighter aircraft. These aircraft often spend several days at the airfield in readiness to deploy to airshows across the Southeast. Their activities are regularly covered by the press and aviation publications. Given the significant damage caused to RAF aircraft at RAF Brize Norton on 20th June 2025, this demonstrated an escalation in the tactics used by activists in general and their preparedness to damage RAF aircraft in pursuit of their cause.
- (c) The Airport is also a home base to the joint OSRL (Oil Spill Response Limited) marked Boeing 727 Aircraft. Given that it is operated and paid for by the UK Oil industry, this is also an obvious target for ‘fossil fuel’ activists. It also operates a sensitive government contract, from London Southend Airport, providing air support for HM Coastguard activities.

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 yet 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 other airports have secured hearings for their respective Injunction renewals. I am concerned that if London Southend

Airport is not granted continuation of its Injunction, it would become an attractive target for activist campaign groups.

INCIDENT AT THE AIRPORT ON 8 JUNE 2026

17 I have been informed by the Airport's Head of Security of an incident which occurred at the Airport on 8 June 2026, which was investigated as a potential breach of the Injunction, but concluded not to be. A group of 48 students attended the Airport and, during security screening, one of the students was found to have a JSO orange hat in her bag. The students also wore orange t-shirts. I am aware that some earlier versions of the briefing note were shared with other airports. Since this actually happened at the Airport, we are in a position to set out the full, final briefing note of the incident which was prepared by the Airport's Head of Security. This is as follows:

“Briefing Note Incident London Southend Airport 08/06/2026

Around 05.00 hrs on 08/06/2026 a group of 48 adult students arrived at London Southend Airport. They went straight to security. Only 1 had a hold bag. During the security screening process, one of the group was found to have a Just Stop Oil (JSO) orange hat in her bag. This had Just Stop Oil and their skull logo on it. The same student also had a tin of ‘Super Glue’ hairspray. When asked why she had the items, she stated that someone had given it to her as a dare to carry for freshers week and gave very vague answers to questions asked by security staff. Another student was found to have a cabin bag with 3 handheld ‘walkie talkie’ radios in it. These were covered in coloured glass beads to look like child’s toys, but were of a good quality Motorola Brand. When asked, her explanation was that her friends preferred to use them rather than mobile phones on a night out. This female was very argumentative and challenging towards security staff. All presented themselves as educated student adults who appeared to be associated with Kings College and UCL, given the logos on their clothing. Two further large tins of the same style hair spray were found in other students bags.

Once through security, a number of these students appeared from the rest rooms with bright orange t shirts on (the same colour orange as JSO). The T

shirts had writing on which read 'Malta Hockey tour 2026'. At the same time, small groups started to position themselves all around the terminal, at or near to exit doors to the apron. The booking was confirmed as being made by 1 person, who had booked 24 flights a month ago, and the other 24 a week before departure. In the 24 hrs prior to departure, there were also another 50 people booked on the Malta flight, which easyJet stated was unusual activity for this route. Police were called and they positioned around the terminal. Other flights were boarded with Police at the gates to clear the terminal down, leaving only the Malta flight passengers.

When Police arrived, the students behaviour was observed. It appeared that several other adult persons were briefly communicating with the student group, but were not sitting with them. The other adult persons were in smaller groups of 2 and were constantly walking around the terminal. Lots of texting was taking place, with many of the students appearing to pick up phones at exactly the same time to read texts. There appeared to be more movement around the terminal than would be usual for a delayed flight.

When the Police had enough resources, airport staff spoke to the organisers. They cooperated fully and explained that the JSO hat found was given by a senior student to a fresher student to carry on the trip as a 'token'. This 'game' of sorts was relevant to all freshers on the trip who were evidently carrying similar random items allocated to them. They agreed to a full bag re-search by security staff.

The organisers stated that they did not have any association with the other adult persons that were witnessed to have approached their group.. The main group of 48 students were taken back to CSA and conversations had with them during bag searches. This did not ascertain much information, as all appeared to say exactly the same, however stories varied a lot as to where they were staying in Malta. All students had their bags searched (with their own consent) and nothing further was found. This was done in the presence of Police. Once cleared they were allowed to fly. It was noticed by airport security staff that a lot of the clothing in the bags appeared old and the toiletries were mainly half used items including perfumes.

Once concluded, on the face of it, the incident did 'appear' to be a large group of adult students going on a hockey tour. We were unable to link anything to the other adults who were seen talking with them. At this time, we do not know if the group had any other intentions, however we dealt with the incident as a potential protest related incident until it was clarified otherwise. The details of the LSA injunction were given to the organisers. The final outcome was a 2 hour delay, which disrupted operations in the terminal and required Police attendance”.

- 18 Whilst ultimately it was concluded that the incident appeared to indeed be a group of students going on a hockey tour, this incident illustrates the level of disruption which is caused by potential protest situations. This is especially the case given the heightened terror level threat in the UK; protest situations could be perceived as a potential terror threat, requiring significant resource to be dedicated to addressing and investigating such incidents.

CONCLUSION

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

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.

Signed by:

474A62B94521461...

Marc Taylor

17 June 2026

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 (“J~~SO~~”) made well publicised threats to disrupt airports during the summer of 2024 [AM1/5-6]. From mid-July 2024 onwards, J~~SO~~ 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 J~~SO~~ undertaking unlawful direct action on numerous other occasions in recent years. As well targeting airports, J~~SO~~ 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 J~~SO~~ activists – many of them repeat offenders – and against the immediate and serious risk of disruption J~~SO~~ continues to pose. During the last week of June 2024, a number of J~~SO~~ 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 subsection 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 <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

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 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: 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:
Philip Spencer
656A85CC3CB44E1.....

Philip Keith Spencer

6 October 2025

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: Second
Exhibit: N/A
Dated: 16 October 2025

IN THE HIGH COURT OF JUSTICE

Claim Number: KB-2024-002596

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 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 second 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.

Purpose of this Statement

4. I make this statement to clarify and confirm the actions taken by the Claimants and/or BCLP acting on behalf of the Claimants, to further comply with the service requirements as set out within the Order of The Honourable Mrs Justice Farbey dated 14 August 2024 (the “**Order**”).

Previous Service

5. Details of service of the original Order and related documents, Notice of Review Hearing and Application Notice are set out in the Second Witness Statement of Marc Taylor and/or my First Witness Statement.

6. Paragraph 47.3 of my First Witness Statement says:

“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”

7. I wish to clarify that what was actually affixed at the stated locations was a letter, a copy of which is annexed to this witness statement. I was informed by the Claimants that this process was complete by approximately 15:01 on 12 September 2025. What was completed by at least 11:14 (not 11:44) on 18 September 2025 was a paper copy of the letter and Application Notice being placed at the Train Station.

Further Service

8. The Claimants and/or BCLP acting on behalf of the Claimants have undertaken the following steps since my First Witness Statement, in respect of the Review Hearing Bundle:
 - 8.1. The Claimants have confirmed to me that a copy of the Review Hearing Bundle was uploaded to the Southend Airport Website (<https://londonsouthendairport.com/corporate/injunction/>) on 8 October 2025 and appeared on the website at approximately 11:32;
 - 8.2. BCLP confirmed the availability of the Review Hearing Bundle to the email addresses listed in Schedule 3 of the Order at 14:19 on 8 October 2025; and
 - 8.3. The Claimants have confirmed to me that a hard copy of the Review Hearing Bundle was made available at the Train Station (consistent with the contents of the Warning Notice at Schedule 5 of the Order) by approximately 11:05 on 8 October 2025.
9. As at the time of this statement, neither BCLP nor the Claimants have received any further correspondence or requests in relation to the previously served documents or to the Review Hearing Bundle.

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

16 October 2025

ANNEXURE – LETTER REFERRED TO AT PARAGRAPH 7



Date: 19 August 2025
Our Ref.: AMR/PSPE/3014634.000001
Your Ref.: KB-2024-002596
Direct Dial: +44 20 3400 3119
Email: Phil.spencer@bcplaw.com

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To Whom It May Concern
London Southend Airport

To Whom It May Concern

Claim No.: KB-2024-002596

(1) London Southend Airport Limited, (2) London Southend Solar Limited and (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

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.

Pursuant to paragraph 9 of the Injunction **PLEASE TAKE NOTE** that:

1. An application has been made in relation to the Injunction;
2. An electronic copy of the application and any further related documents will be accessible at <http://londonsouthendairport.com/corporate/injunction>; and
3. A hard copy of the application and any further related documents will also be accessible:
 - a. At The Ticket Office, Southend Airport Train Station, Southend-on-Sea, Essex SS2 6YF, which is open between 9am-5pm Monday-Friday; or
 - b. By contacting Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR (Reference: AMR/PSPE/3014634.1; Telephone: 020 3400 3119)

Yours faithfully

Bryan Cave Leighton Paisner LLP