

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:

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Marc Taylor

17 June 2026