

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

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REVIEW HEARING
HEARING DATE: 2 JULY 2026

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N244

Application notice

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Name of court In the High Court of Justice King's Bench Division		Claim no. KB-2024-002596	
Fee account no. (if applicable)		Help with Fees - Ref. no. (if applicable)	
PBA0076972		H W F - [] [] [] - [] [] []	
Warrant no. (if applicable)			
Claimant's name (including ref.) (1) LONDON SOUTHEND AIRPORT COMPANY LIMITED (2) LONDON SOUTHEND SOLAR LIMITED (3) THAMES GATEWAY AIRPORT LIMITED			
Defendant's name (including ref.) PERSONS UNKNOWN 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			
Date		26 June 2026	

1. What is your name or, if you are a legal representative, the name of your firm?

Bryan Cave Leighton Paisner LLP

2. Are you a Claimant Defendant Legal Representative

Other (please specify)

If you are a legal representative whom do you represent?

Claimants

3. What order are you asking the court to make and why?

1. An order amending the description of the Defendant (persons unknown) so that it expressly covers unlawful activities carried out by the "Take Back Power" group and/or ostensibly in connection with a campaign against wealth inequality.
2. Orders pursuant to CPR r.17.1 to permit amendments to the Claim Form and Amended Particulars of Claim to record that change, and for the existing Injunction to be varied to reflect the change (in the manner provided in the amended draft Order filed herewith).
3. The order is sought because (as explained in the 3rd Witness Statement of Philip Spencer, already filed in these proceedings), Take Back Power has been announced as a "new project" of Just Stop Oil, and is a campaign ostensibly directed against "the super rich" including (but not necessarily limited to) their perceived effect on climate change.
4. The existing description of the Defendant therefore risks ambiguity or a lacuna in the event that unlawful direct action is carried out by Take Back Power and/or ostensibly directed at socioeconomic issues as opposed to environmental campaigns.
5. There is a second annual review hearing for 10 other major UK airports' similar injunctions on 30 June 2026. Those airports have identified the above ambiguity or a lacuna and have sought a like amendment to the description of the Defendant to address it. It is desirable that a common approach should be adopted between similar injunctions affecting all major UK airports.

4. Have you attached a draft of the order you are applying for? [The draft order attach shows, tracked, amendments made to the draft Order presently in the hearing bundle at Tab 1. Also attached is the skeleton argument of the 10 airports who have their review hearing on 30 June 2026.]

Yes

No

5. How do you want to have this application dealt with?

at a hearing

without a hearing

at a remote hearing

6. How long do you think the hearing will last?

Hours

Minutes

Is this time estimate agreed by all parties?

Yes

No

7. Give details of any fixed trial date or period

Injunction Renewal Hearing 2 July 2026

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

The Defendant: Claimants to serve

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

- the attached witness statement [Spencer 3 dated 17 June 2026]
 the statement of case
 the evidence set out in the box below

1. The second annual review hearing of an injunction preventing unlawful 'direct action' protest at London Southend Airport is to be heard on 2 July 2026.
2. The Defendant to the existing proceedings (and injunction) is: "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."
3. As explained in Spencer 3, already filed in these proceedings (and contained in the hearing bundle (at Tab 7, p.46ff), Just Stop Oil's website advertises (as a "New Project") an (apparently) related group called "Take Back Power".
4. Take Back Power's own website (as also explained in Spencer 3) expresses an intention to "*undertake nonviolent action to resist the super-rich*". That appears to be motivated, at least in part, by environmental concerns (e.g., the statement that the super-rich "*profit from [...] heating the world to building point*"), but may also be motivated by broader socioeconomic concerns. Take Back Power has carried out unlawful direct-action activities against luxury retailers.
5. The Claimants reasonably fear that London Southend Airport is, absent injunctive relief, a likely target for such direct-action activities. That is particularly so given (as explained in Spencer 3 and Taylor 3 already filed in these proceedings) the private aviation services offered at the airport.
6. Whilst the Claimants consider that direct-action activities targeted against private (or other) aviation at Southend Airport would properly be characterised as having sufficient environmental motivation to fall within the existing definition of the persons unknown defendant, they recognise that some ambiguity may in practice arise if ostensibly carried out with socioeconomic motivations.
7. They, further, note that 10 other UK airports (London City, Manchester, Stansted, East Midlands, Leeds Bradford, Luton, Newcastle, Birmingham, Bristol and Liverpool), have the benefit of similar injunctions which are (together) subject to a second annual review to be heard on 30 June 2026.
8. 7 of those 10 other airports have (by application notices dated 18 June 2026) sought leave to amend the definition of the defendant in like terms to the amendment now sought by the Claimants. In so doing, they have identified (and therefore drawn focus to) the potential ambiguity identified above (the drafting of the orders affecting the other 3 was seemingly not affected, as the drafting already covered the point). This application notice appends the publicly available skeleton argument of those 10 airports which explains the position at paras 84-89.
9. In those circumstances, the Claimants consider that it would be desirable: (i) to ensure that any potential ambiguity was removed; and (ii) for injunctions affecting all major UK airports against materially the same threat to be in materially the same terms.
10. The Claimants, therefore, seek leave to amend the definition of the Defendant (and to amend their Claim Form and Amended Particulars of Claim accordingly) so that it reads (mirroring the language in the draft Order sought by those 7 airports):

"PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHER WEALTH INEQUALITY 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 RE-AMENDED PARTICULARS OF CLAIM."

11. This application will be served in accordance with the mechanisms provided for service under the existing Injunction.
12. In addition, the Claimants will provide notice of this Application to Take Back Power via the email addresses available on its website. The Claimants are unaware of any other practicable step as may be taken to notify Take Back Power of this application.
13. That these steps have been taken will be confirmed in a further witness statement confirming the notification/service requirements taken in advance of the hearing on 2 July 2026.
14. For the benefit of the reader of this Application and any person potentially affected by it: all relevant documents concerning the Injunction and the second annual review hearing can be found at: <https://londonsouthendairport.com/corporate/injunction>

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

- No


Statement of Truth

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I believe that the facts stated in section 10 (and any continuation sheets) are true.

The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature



Applicant

Litigation friend (where applicant is a child or a Protected Party)

Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

26

Month

06

Year

2026

Full name

Rebecca Flynn

Name of applicant's legal representative's firm

Bryan Cave Leighton Paisner LLP

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

Associate

Applicant'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 4344

Fax phone number

DX number

Your Ref.

Email

CLAIM NO: KB-2024-001765
CLAIM NO: KB-2024-002132
CLAIM NO: KB-2024-002317
CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BETWEEN :

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

Claimants

and

PERSONS UNKNOWN
[more fully described in the Claim Form]

Defendants

AND BETWEEN:

(1) MANCHESTER AIRPORT PLC
[and others more fully described in the Claim Form]

Claimants

and

PERSONS UNKNOWN
[more fully described in the Claim Form]

Defendants

AND BETWEEN:

(1) LEEDS BRADFORD AIRPORT LIMITED
[and others more fully described in the Claim Form]

Claimants

and

PERSONS UNKNOWN
[more fully described in the Claim Form]

Defendants

AND BETWEEN:

(1) BIRMINGHAM AIRPORT LIMITED
[and others more fully described in the Claim Form]

Claimants

and

PERSONS UNKNOWN
[more fully described in the Claim Form]

Defendants

CLAIMANTS' SKELETON ARGUMENT

For hearing 30 June 2026: time estimate 1 day

References are in the form:

[PAGE] referring to the supplemental hearing bundle for the hearing

[AB/PAGE] referring to the authorities bundle

Suggested Pre-Reading (Time Estimate: 2 hours of judicial time)

- The Claimants' chronology
- Order of Julian Knowles J dated 20 June 2024 ("**Knowles J Order**") [52-67]
- The judgment of Julian Knowles J, with neutral citation [2024] EWHC 2557 (KB) ("**the Knowles J Judgment**") [74-85]
- Orders of HHJ Coe KC dated 5 July 2024 ("**HHJ Coe Orders**") [732-765]
- The judgment of HHJ Coe KC, with neutral citation [2024] EWHC 2247 (KB) ("**the HHJ Coe Judgment**") [775-782]
- Orders of Ritchie J dated 18 July 2024 ("**Ritchie J Orders**") [1157-1188]
- The judgment of Ritchie J dated 18 July 2024, with neutral citation [2024] EWHC 2274 (KB) ("**the Ritchie J Judgment**") [1199-1212]
- Orders of Jacobs J dated 6 August 2024 ("**Jacobs J Orders**") [1654-1686]
- The note of the hearing before Jacobs J [1689-1697]
- Orders of Bourne J dated 24 June 2025 ("**Bourne J Orders**") [86-103; 783-785; 1213-1215; 1698-1700]
- The judgment of Bourne J dated 26 August 2025, with neutral citation [2025] EWHC 2223 (KB) ("**the Bourne J Judgment**") [106-115]
- The first witness statement of Alexander Wright dated 11 June 2026¹ in claim number KB-2024-001765 [125-142]
- The application notices dated 18 June 2026 [394-399; 1098-1103; 1571-1577; 1982-1987]
- The second witness statement of Alexander Wright dated 24 June 2026 [415-426]
- The draft orders [2008-2025; 2026-2028; 2029-2063; 2064-2100]

Introduction

1. Between them, Cs own and operate the ten airports at (1) London City, (2) Manchester, (3) Stansted, (4) East Midlands, (5) Leeds Bradford, (6) London Luton, (7) Newcastle

¹ The Court is referred to this statement by way of example given the evidence produced in the other three claims is almost identical. Where there are distinctions, we explain those in the body of this skeleton argument.

International, (8) Birmingham, (9) Liverpool and (10) Bristol (“**the Airports**”). In June, July and August 2024, they obtained injunctions, provoked by a threatened campaign of disruptive protest at airports in the UK by Just Stop Oil (“**JSO**”).

2. On 24 June 2025, Bourne J carried out the first annual review of those injunctions and determined that they should continue in force. This hearing has been listed as the second annual review.

3. As explained by the Supreme Court in *Wolverhampton CC and others v. London Gypsies and Travellers and others* [2023] UKSC 47; [2024] 1 AC 983 [**AB/77**], the purpose of a review is that it:

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

4. That formulation assumes a “contested” review in which at least one person comes forward with objections to the order, or to aspects of the order. In practice, in the case of an un-contested review, the Courts have held that the primary focus for the Court on review is not to revisit the merits of the case as if *de novo* but, rather, to assimilate the matter sufficiently to take an informed view about whether the injunction has outlasted the compelling need which led to its being made in the first place, in view of any changed circumstances. That is really the only — and certainly the best — practical / proportionate way of dealing with these matters. For a convenient recent judicial summary of the appropriate approach, see *Valero Energy Limited v. PU (2026 review)* [2026] EWHC 397 (KB) at ¶¶5–13 [**AB/85-87**].

5. Where, as here, Cs suggest that the Order needs updating in light of changed circumstances, the approach adopted to date was summarised by Sweeting J in *Esso Petroleum v. PU* [2025] EWHC 1768 (KB), *per* Sweeting J at ¶¶5–8 [**AB/93**]:

“8. I agree that this is the practical and proportionate way to approach a review ordered as part of the original grant of relief. Such a review is also an opportunity to make necessary adjustments in the light of experience of the practical operation of the injunction and changing circumstances. The Court should nevertheless be wary of embarking upon fundamental changes to the scope or nature of injunctive relief at a review hearing rather than requiring a further and full application to be made. I also bear in mind that there is no legal presumption of continuance.”

6. Cs seek orders that the injunctions remain in full force, subject to certain variations, all of which (it is submitted) are “necessary adjustments in the light of experience of the practical operation of the injunction and changing circumstances”. Additionally, it will be necessary to refer the Court to certain procedural points which have occurred by way of full and frank disclosure, but Cs will suggest that these matters, while unfortunate, certainly do not indicate that the injunctions have outlasted the compelling need which led to their imposition.

Full and frank disclosure

7. Five procedural matters are drawn to the Court's attention by way of full and frank disclosure:

(1) Notification of the Bourne J Orders by email

8. The injunctions required service of any applications or documents in the proceedings to be effected by:

- (1) Uploading the order to each Airport's dedicated website page.
- (2) Sending an email stating that the documents could be found at the dedicated website to email addresses identified in the orders.

[91 at ¶11; 735-736 at ¶¶5 and 10; 1159-1160 at ¶¶3 and 9; 1656 at ¶5]

9. The "uploading" requirement was met [127 at ¶4.1.1; 810 at ¶4.1.1; 1240-1241 at ¶4.1.1; 1725-1726 at ¶4.1.1].
10. The "email" requirement is more doubtful: in preparing for this hearing, Cs' solicitors have been unable to verify whether emails were sent to the required email addresses in 2025. It is not known whether this is a mere difficulty of verification, or whether in fact the "email" requirement was overlooked. The problem has arisen because the key personnel at Eversheds Sutherland (International) LLP who dealt with these cases have left the firm. The fee earners now dealing with these cases cannot identify from the files what the departed individuals did, and the departed solicitors (who have, of course, been contacted) cannot now recall what occurred. As Cs' solicitors do not know whether the required emails were sent in 2025, on 9 June 2026, Mr Wright sent the Bourne J Orders by email to the relevant email addresses [128 at ¶¶4.2-4.3; 811 at ¶¶4.2-4.3; 1241 at ¶¶4.2-4.3; 1726 at ¶¶4.2-4.3].
11. Because they cannot prove otherwise, Cs proceed on the basis that the relevant emails were not sent until 9 June 2026.
12. A failure to comply with the service requirement for an injunction is a serious matter. It might, in an appropriate case, justify the Court not making or discharging an injunction.
13. We suggest that this is not one of those cases:
 - (1) The most likely explanation is that any failure to serve the orders by email was by oversight and accidental, rather than deliberate. It was corrected as soon as the error came to light.
 - (2) The form of orders under review at the hearing on 24 June 2025 did not imply that the injunctions would lapse subject to review. The Bourne J Orders did not replace the earlier orders made by Knowles J, HHJ Coe, Ritchie J or Jacobs J but

directed they were to remain in full force and effect [86-87; 783-785; 1213-1215; 1698-1700]. Other than in relation to London City Airport which is more fully addressed below, the original orders remained unaffected save for a minor amendment to list subsequent review hearings together. The obligation on an applicant to take steps to actively draw the order to the attention of all actual and potential respondent is so that those respondents know of the terms and scope of the injunction and that they can apply to vary or discharge it should they wish: ¶230 of *Wolverhampton* [AB/78]. Given the nature of the Bourne J Orders, no – or at most very limited – prejudice was caused to Ds by Cs’ failure to give notice by email: the persons controlling the email accounts were, or ought to have been, aware of the restrictions in the injunctions and their scope and what rights they had to apply because the original orders had been sent to the email addresses following the hearings in June, July and August 2024 and they had been notified that an application had been made to review those orders.

- (3) Had there been a breach of the injunctions since the 2025 review hearing, it is highly likely that the point would have been spotted in good time to protect any alleged contemnor, because the exercise which has been undertaken prior to the forthcoming review hearing (of reviewing what steps had been taken to notify Ds of the order) would then have been undertaken, with the result that no committal could or would have proceeded. So, the consequence of the failure rests with Cs.

(2) Notification of the Bourne J Orders by affixing at the sites

14. In the cases of Manchester Airport [735-736 at ¶¶5c and 1]; Stansted Airport [746-747 at ¶¶5c and 10]; East Midlands Airport [757-758 at ¶¶5c and 10], HHJ Coe KC ordered that further applications or documents were also to be served by affixing a notice at locations marked on plans of the airport, setting out where the applications or documents could be found and obtained in hard copy. For those Airports, Cs affixed copies of the relevant Bourne J Order at the locations marked on the plans in the week of 30 June 2025 [811 at ¶4.1.3].
15. In the cases of Leeds Bradford Airport, Newcastle International Airport and London Luton Airport, Ritchie J ordered that further documents were to be served by carrying out “each of the steps in paragraph 3” of his order [1160; 1170; 1181]. Paragraph 3 included a direction requiring the claimant to affix a notice setting out where the “Claim Documents and this Order” could be found and obtained in hard copy at locations on a plan “in the form specified in Schedule 4” [1159; 1169; 1180]. The form of notice at Schedule 4 to the Ritchie J Orders was a warning notice relating to the order made by Ritchie J [1165-1166; 1176-1177; 1187-1188].
16. In light of defined terms and the form of warning notice being prescribed as the one at Schedule 4 and Bourne J not ordering the replacement of that warning notice, no fresh

notices were affixed at Leeds Bradford, Newcastle International or London Luton Airports and the original warning notices remain present: ¶4.1.2 [1241].

17. Cs took the steps that they understood constituted the requirements of paragraph 3 and 9 of the Ritchie J Orders [1241 at ¶4.1.3]. Additionally, in the case of London Luton Airport, on 1 July 2025, a copy of the Bourne J Order was affixed at the locations marked “X” on the plan to the Ritchie J Order [141 at ¶¶4.1.3.1].
18. However, in preparing for the review hearing, Cs have identified that there is some arguable ambiguity in what was required for notification of further documents or applications by the Ritchie J Orders i.e., whether they had been directed to affix a notice setting out where the Bourne J Order could be obtained at Leeds Bradford, London Luton and Newcastle International Airports on the locations marked X. In consequence:
 - (1) On 15 June 2026, the Bourne J Orders were affixed at Leeds Bradford and Newcastle International Airport at the relevant locations [426 at ¶7.1.2].
 - (2) Cs invite the Court to vary the Ritchie J Orders so as to specify a notice must be affixed at the relevant locations at the Airports identifying where further documents can be found or obtained in hard copy. Cs also propose to affix any order made following this year’s review hearing at each of the Airports.

(3) London City Airport: the form of order

19. The one substantive change to the original injunction made in 2024 was in the case of London City Airport. In that case, Cs’ cause of action was trespass such that the geographical scope of the injunction excluded certain areas over which third parties had interests and to which Cs did not have an immediate right to possession. As a result of a grant of a further third party interest, Cs sought to reduce the scope of the injunction in order to introduce a new zone within the red line on the plan to the injunction which was excluded from the scope of the injunction [425 at ¶¶6.1-6.4; 665-670].
20. Bourne J gave permission to amend the claim form for that amendment and, in light of that, a new plan was annexed to the Knowles J Order. The minute of order prepared had that new plan annexed to the Knowles J Order which formed a schedule to Bourne J Order.
21. Cs’ solicitors noticed on 10 June 2026 that the amended Knowles J Order annexed to the Bourne J Order which was uploaded to the London City Airport website page had suffered a formatting issue: the revised plan was displayed portrait, rather than landscape. The effect of that was that only part of the red-line boundary was visible. The part which was not visible included the newly-excluded zone. This was a formatting error which had occurred in the process of the Court sealing the order [128 at ¶4.6; 425 at ¶6.5; 676-699], which Cs did not notice earlier.

22. Properly construed, the injunction extends to the “land known as London City Airport” which is then “shown for identification edged red on the attached Plan 1 at Schedule 1” to the Knowles J Order. The plan does not define the scope of “London City Airport” but is for identification purposes. Cs accept, however, that the existing plan to the amended Knowles J Order is unclear and invite the Court to vary the Knowles J Order at this hearing to correct that formatting error by replacing the correct plan in Schedule 1.
23. As set out above, the sealed order which had the formatting error was uploaded to the dedicated website on 27 June 2025 [86-103; 127-128 at ¶¶4.1.1 and 4.6].
24. Again, until 9 June 2026, the order was not sent to the specified email addresses. The points made above at paragraph 11 above apply *mutatis mutandis*. In relation to this Airport, Cs accept that an email recipient of the initial injunction would have erroneously thought that they would be in breach of the injunction by entering onto that part of the airport which, as of 24 June 2025, had been excluded from the scope of the injunction.
25. But the impact of that would, in practice, be minimal:
 - (1) Such a person who wished to carry out protest activity in connection with JSO or another environment campaign could only carry out that direct action at London City Airport by entering the Airport over a roadway or from the Docklands Light Railway. The entrance-points fall within the scope of the injunction and they are points at which updated warning notices have been displayed from 6 August 2025 [128 at ¶¶4.4-4.6; 198 at the locations marked “X”]. Those warning notices had annexed to them the landscape plan which was approved by Bourne J at the hearing on 24 June 2025, so any person entering onto London City Airport would then be aware what the exclusion zones were [701].
 - (2) In any event, in order to reach the area excluded from the scope of the injunction, such a person could only access exclusion zones by crossing over parts of the airport within the scope of the injunction.

(4) London City Airport: permission to amend

26. Cs did not, in fact, file an amended claim form following the hearing on 24 June 2025 and, consequently, also did not notify Ds. Again, this arose because of the departure of certain solicitors from Eversheds Sutherland (International) LLP.
27. Cs have sought to rectify it: on 15 June 2026, an amended claim form was filed. It has not been returned by the Court but will be served once it has been [425 at ¶6.6].

(5) Note of the 24 June 2025 review hearing

28. A note of the 2025 review hearing was not uploaded to the dedicated websites until 15 June 2026 [426 at ¶7.1.1.2]. It might be said against Cs that, as an injunction against

Persons Unknown is always a without notice injunction, that was necessary as part of natural justice although there was no such direction or undertaking in the Bourne J Orders: *Interoute Telecommunications (UK) Ltd v Fashion Gossip Ltd*, unreported, 23 September 1999 *per* Lightman J [AB/99].

29. To that:

- (1) It is doubtful whether that rule applies in the case of a review hearing given that it is not a without notice application for an injunction: although there is no legal presumption that the order granted last year will continue, neither is there any presumption that it will lapse, provided that the review takes place: *WM Morrison Supermarkets Ltd v Persons Unknown* [2026] EWHC 1379 (KB) *per* HHJ Wall sitting as a Judge of the High Court at ¶16 [AB/105].
- (2) A transcript of the Bourne J Judgment has been on the websites since August 2025 [426 at ¶7.1.1.1]. The skeleton argument for that hearing also appears there [191; 884-886; 1317-1319; 1792-1794]. Anyone visiting that website, and who wished to appraise whether to apply to set aside or vary the Court's orders, would have been aware of, at very least, the nature of the submissions by Cs because of the skeleton argument and the Bourne J's summary in the judgment.
- (3) Further still, the note of the hearing was available on the websites between 3-5 days after notice of the hearing on 30 June 2026 was uploaded to the dedicated websites and emails were sent [416-417 at ¶¶2.1-2.3] and 15 days prior to the hearing itself. If any person wanted to apply to set aside or vary any orders at this hearing they have had sufficient opportunity to consider the note of the hearing.

Notice of this hearing

30. Since Ds' Convention right to freedom of expression is engaged, and since Ds are (by definition) neither present nor represented, it might be said that by virtue of s.12 of the Human Rights Act 1998 ("HRA 1998") before making the order, the Court must be satisfied either that (i) Cs have taken all practicable steps to notify the respondents, or that (ii) there are compelling reasons why the respondents should not be notified.
31. Again, it is doubtful whether this provision applies in relation to a review hearing, for the reasons identified in ¶29(1).
32. However, Cs erred on the side of caution and have:
 - (1) Uploaded the application for continuation of the injunction and the notice of hearing to the dedicated websites [416-417 at ¶2.1]. In the case of the notice of hearing that Cs' solicitors produced this occurred on 10 or 12 June 2026. The sealed application was uploaded on 12, 16, 17 or 18 June 2026 [421 at ¶3.4]. Mr Wright's first statement for this review hearing was upload on 12 or 15 June 2026

[422-423 at ¶4.5];

- (2) Sent emails to the email addresses identified in the orders, as well as a further email address identified for Extinction Rebellion (“XR”) and other organisations who have emerged promoting direct action on organisations connected with the fossil fuel industry as well as other potentially relevant organisations known as Take Back Power (whose involvement is explained more fully below); Fossil Free London and Youth Demand [417-418 at ¶¶2.3-2.6]. Cs’ solicitors notice of hearing was sent on 11 and 12 June 2026, with Mr Wright’s first witness statement, and the sealed application notice was sent on 11 or 16 June 2026 [420-421 at ¶3.2; 422 at ¶4.4]; and
 - (3) Between 11 and 15 June 2026, affixed notices at the locations shown on the plans for each airport [418 at ¶¶2.8-2.9], which identify the time and date of the hearing and explain where copies of the relevant documents can be found [608-617].
33. Cs have also informed third party occupiers, where relevant, of the application to continue the initial injunctions for a further twelve month period [419 at ¶2.12; 1242-1243 at ¶¶5.3.2, 5.4.2, 5.5.2; 1727 at ¶¶5.4.2 and 5.5.2]. They have either had no response or no objection from those occupiers.
34. As to that:
 - (1) What Cs have done by way of service or notification is – they submit – all that is “practicable”. That test is a less stringent test than “possible”.
 - (2) Cs struggle to think of additional steps beyond those taken, which are realistically likely to draw these proceedings to a materially larger pool of interested respondents.
 - (3) Moreover, unless and until someone is named as a defendant, or knowingly breaches the order, there is strictly no defendant to the proceedings and, by parity of reasoning, no available respondent to Cs’ application.
 - (4) In the circumstances, Cs submit that the test in the HRA 1998 is satisfied.
35. Clearly the issue of how notification might be effected is one upon which there can be different approaches. If present or represented, Ds could have made submissions to the effect that further and additional measures could have been taken. It might be said on behalf of Ds (for example) that the application could be advertised in local or national press. Whilst it is right to draw these potential arguments to the attention of the Court in the absence of any representation for Ds, there is no good reason to consider that the steps already taken are in any way inadequate, or that addition of any further measure would have any significant prospect of drawing the existence of the application to the attention of someone who would not have been made aware of its existence by the measures

actually undertaken.

The original threat and events up to the first review

36. The background to these claims is explained in the Knowles J Judgment, the HHJ Coe Judgment and the Ritchie J Judgment:
- (1) JSO appeared to have been planning a campaign of disruptive protest during the summer related to the environment and opposing fossil fuels at airports since at least 9 March 2024 [¶¶4 and 20 Ritchie J Judgment [1200-1201; 1205]; ¶¶13-15 Knowles J Judgment [77-78]].
 - (2) On 2 June 2024, protestors affiliated with Extinction Rebellion (“XR”) carried out a protest at Farnborough airport [¶5 Ritchie J Judgment [1201]; ¶19 Knowles J Judgment [81]].
 - (3) By an email dated 6 June 2024, JSO emailed its members stating that the summer action at airports was coordinated internationally across Europe, taking the fight to airports [¶5 Ritchie J Judgment [1201]; ¶16 Knowles J Judgment [80]].
 - (4) On 20 June 2024, two protestors used an angle grinder to cut a hole in the perimeter fence at Stansted Airport and spray painted 2 aircraft using a fire extinguisher [¶4 Ritchie J Judgment [1200-1201]; ¶12 HHJ Coe Judgment [778]]. This resulted in the activity on the runway being suspended and three aircraft departures delayed.
 - (5) On 25 June 2024 protestors were apprehended at Gatwick Airport with bandages in their bags [¶23 Ritchie J Judgment [1206]; ¶12 HHJ Coe Judgment [778]].
37. On 20 June 2024, Knowles J granted an injunction in respect of London City Airport [52-67]. That order prohibited Ds from entering, occupying or remaining on London City Airport but excluding Third Party Areas, without the consent of the relevant Cs, until 20 June 2029 or final determination of the claim or further order
38. On 5 July 2024, HHJ Coe KC (Sitting as Deputy High Court Judge) granted injunctions in respect of the whole of Manchester Airport, Stansted Airport and East Midlands Airport (as shown on plans to the orders) with immediate effect and until varied, discharged or extended by further order and subject to periodic review on application at intervals not exceeding 12 months [732-743 by way of example]. The injunctions covered a broader list of prohibited acts as well prohibiting Ds from entering, occupying, or remaining on any part of the airports without the consent of the relevant claimants.
39. On 18 July 2024, Ritchie J granted injunctions in respect of Leeds Bradford Airport, Luton Airport and Newcastle International Airport [1157-1166 by way of example]. Again, the orders extended to the entirety of the land shown outlined in red on plans to

the orders. The injunctions prohibited Ds from entering, occupying or remaining on any part of the airports for the purpose of protesting about fossil fuels or the environment without the relevant claimants' consent. Again, they were granted with immediate effect and until varied, discharged or extended by further order and subject to periodic review on application at intervals not exceeding 12 months.

40. On 6 August 2024, Jacobs J granted injunctions in respect of Birmingham Airport, Bristol Airport, and Liverpool Airport [1654-1664 by way of example]. Those orders were in materially the same form as the Ritchie J Orders.
41. Although not the subject of these claims or the applications before the Court at this hearing, it is relevant to note that three other airports have been the subject of injunctions: Heathrow Airport, which was granted by Julian Knowles J on 10 July 2024; Gatwick Airport, granted by Ritchie J on 19 July 2024; and Southend Airport granted by Farbey J on 14 August 2024 [126 at ¶2.2.2].
42. Relevant events which occurred after some or all of those orders were made included:
 - (1) On 19 June 2024, the founder of JSO, Roger Hallam, was found guilty of conspiring to block the M25 motorway. The sentence he received, following an appeal, was four years in prison (reduced from an original sentence of five years): ¶13(a) of the Bourne J Judgment [109].
 - (2) On 24 July 2024, ten JSO activists were arrested at Heathrow Airport, seemingly equipped to cut through fences / affix themselves to parts of the land or aircraft. Nine of those individuals were later found guilty by a jury of conspiracy to cause a public nuisance, receiving sentences ranging from prison terms of 15 months to suspended sentences: ¶13(b) of the Bourne J Judgment [109].
 - (3) On 27 July 2024, a protest which was due to occur at London City Airport was relocated to the Department of Transport: ¶13(c) of the Bourne J Judgment [109].
 - (4) On 29 July 2024, eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure: ¶13(d) of the Bourne J Judgment [109].
 - (5) On 30 July 2024, two JSO activists were arrested at Heathrow Airport after spraying orange paint around Terminal 5's entrance hall and on the destination boards at the departure lounge. A jury was unable to return a verdict: ¶13(e) of the Bourne J Judgment [110].
 - (6) On 31 July 2024, a protest by JSO and Fossil Free London was held at the Docklands Light Railway Station at London City Airport, being an area excluded from the scope of the injunction: ¶13(f) of the Bourne J Judgment [110].

- (7) On 1 August 2024, six JSO activists blocked access to departure gates at Heathrow Airport: ¶13(g) of the Bourne J Judgment [110].
- (8) On 5 August 2024, five JSO activists were arrested on their way to Manchester Airport, with bolt cutters, angle grinders, glue, sand and banners reading “oil kills”. Four of them were subsequently found guilty of conspiracy to commit a public nuisance and sentenced to terms in prison: ¶13(h) of the Bourne J Judgment [110].
- (9) On 21 February 2025, XR held a demonstration at Inverness Airport against climate change: ¶13(i) of the Bourne J Judgment [110].
- (10) On 27 March² 2025, JSO made an announcement which appeared to give the impression that it was withdrawing from mounting protests by direct action: ¶13(j) of the Bourne J Judgment [110].
- (11) On 18 May 2025, GB News reported that JSO was considering a “dramatic U-turn” and, on 21 May 2025, JSO sent a link to the article to its subscribers with the comment “GB News was right for once. We are ‘plotting a comeback’”: ¶13(k) of the Bourne J Judgment [110].
- (12) On 21 May 2025, London City Airport received intelligence that a protest planned to take place at Heathrow Airport had been relocated because of the injunction obtained by the airport and “to avoid the risk of associated penalties for breaching the injunction”: ¶13(l) of the Bourne J Judgment [110].
- (13) JSO was advertising training programmes teaching those attending how to “plan the seeds of the coming non-violent revolution” and was taking donations for a “New campaign [that] was in the works”: ¶¶13(m)-(n) of the Bourne J Judgment [111].
43. On 24 June 2025, Bourne J heard the first annual review of the injunctions granted by the Knowles J Order, the HHJ Coe Orders, the Ritchie J Orders and the Jacobs J Orders. He determined that, in the round, there had been no material change in circumstances that removed or seriously diminished the rationale for the injunctions and that they should continue in force: ¶¶14-18 of the Bourne J Judgment [111-112].
44. The Bourne J Orders ordered that the Knowles J Order, the HHJ Coe Orders, the Ritchie J Orders and the Jacobs J Orders remained in full force and effect, subject to certain variations to direct that the listing of the subsequent annual review hearing in each claim be heard together and consequential directions for that hearing.
45. The orders made in respect of Heathrow Airport, Southend Airport and Gatwick Airport

² The reference to 27 “May” 2025 in the judgment is a typing error. See [AB/130 at ¶15].

were also continued following the Court's first annual review on 23 July 2025, 22 October 2025 and 18 July 2025 respectively: ¶9 [136].

Events since 24 June 2025

46. A description of the relevant events since the injunctions were granted is set out in Cs' chronology and in the evidence. Those identified as being the most relevant are:
47. On 3 July 2025, XR supporters blockaded the entrance to the Energy Insurance London Conference.
48. On 5 July 2025, XR launched its 'Insure our Survival' Campaign: a seven-day environmental / anti-fossil fuels protest as part of XR's Summer of Action.
49. On 5 July 2025, XR supporters marched to London Oxford Airport to draw attention to the number of private jets carrying ultra-wealthy passengers: ¶7.2 [130; 238-239].
50. On 9 July 2025, XR supporters protested outside of Inverness Airport's terminal to campaign against a private jet company: ¶7.2 [131; 242-244].
51. On 9 July 2025, XR supporters disrupted the British Insurance Awards by blocking the red carpet.
52. On 16 July 2025, XR supporters targeted AIG as part of the Insure Our Survival campaign.
53. On 26 July 2025, ten Greenpeace activists were arrested after suspending themselves from a bridge outside Edinburgh. They dangled themselves 25m above the water line, stopping a tanker for 24 hours.
54. On 22 August 2025, "Shut The System" announced that it is embarking on a "Summer of Sabotage" targeting businesses it considers to be the largest contributors to climate destruction.
55. On 8 September 2025, XR announce a protest campaign from 8-22 September, targeting companies that are enabling fossil fuel projects.
56. On 9 September 2025, XR protestors staged protests at the London offices of AXA and AIG, blocking access to the buildings.
57. On 18 September 2025, two JSO protestors who had spray painted private jets at Stansted Airport in June 2024 were found guilty of criminal damage at Chelmsford Crown Court and receiving suspended custodial sentences: ¶7.2 [132; 287-288; 366-368].
58. On 5 November 2025, Fossil Free London campaigners disrupted BP panel event at Simmons & Simmons LLP.
59. In December 2025, a group called Take Back Power carried out direct action by covering

the crown jewels at the Tower of London with custard and depositing manure at the Ritz in London [134 at ¶8.2; 332-333].

60. On 19 January 2026, XR protestors staged a protest outside the Macquarie Group Headquarters to protest against the expansion of Farnborough Airport. Two activists occupied the entrance to the building unfurling a banner that called for a ban on private jets and urged for ties to be severed with fossil fuels: ¶7.2 [132; 296].
61. On 30 April 2026, the Joint Terrorism Analysis Centre, which is the body responsible for setting the terrorism threat level for the UK, raised the terrorism threat level from “substantial” to “severe”, meaning an attack is “highly likely” [129-130; 219-224].
62. On 1 May 2026, Take Back Power activists occupied the luxury department store Liberty and disrupted access to the luxury hotel Claridge’s.
63. On 6 May 2026, Fossil Free London protested outside Shell HQ ahead of its quarterly profits’ announcement.
64. On 7 May 2026, climate activists disrupted a Barclays’ shareholder meeting.

The appropriate test for review

65. Please see ¶¶3 – 5 above.

Submissions: introduction

66. Overall, Cs’ position is that the circumstances which justified making the orders in June and July 2024, have not materially changed in a way that casts doubt on whether there continues to be a compelling need for the relief. There are no legal or factual developments or changes which necessitate the Court going behind the findings by the original judges.

(1) The basis for the orders

67. The original threat and harm leading to the orders are set out at ¶36 above.

(2) Circumstances since the grant of the order

68. This is addressed generally in ¶¶46 – 61 above.
69. Since JSO’s announcement in 2025, Cs are not aware of any incidents of direct action carried out by persons connected with JSO: ¶8.1.2.2 [133].
70. We make two points about that:
71. First, JSO does not appear to have entirely disappeared: ¶8.1.2 [133]. The group appears active on social media platforms and its website remains live. What appears to have happened is that activists historically connected with JSO have now started to protest

under a different banner known as “Take Back Power”: ¶¶8.1.2.1 and 8.1.3 [133]. Protestors protesting under the banner of Take Back Power have been routinely engaged in direct action since around December 2025 and, as an organisation, Take Back Power is avowedly committed to this as a means of achieving its aims: ¶8.2.4 [134; 338]. So far, no airports have been targeted by Take Back Power protestors.

72. Secondly, the injunctions sought by the airports was not exclusively directed at JSO. The apparent quietening down of JSO activity does not correspond with the end of direct action by other protest groups [134-136 at ¶¶8.2-8.4]. In addition to Take Back Power, XR and Fossil Free London have repeatedly carried out protests by direct action since the 2025 review hearing [130-132].

(3) Compelling need for the orders

73. The evidence broadly indicates the following:

- (1) There has been no direct action at any of the Airports protected by injunctions since the 2025 review hearings: ¶11.2 [138; see also 823 at ¶12.2; 1254 at ¶12.2; 1737 at ¶11.2].
- (2) Nor have there been protests at Heathrow, Gatwick or Southend Airports since the 2025 review hearing: ¶7.2 [130-131].
- (3) There has, in contrast, been direct action at other locations in that period which the evidence identifies as being sites without the benefit of the protection of injunctions: ¶7.2 [130-131; 137-138].

74. As against Cs, it might be said that the evidence in paragraphs 73(1) and 73(2) above indicates that the injunctions have outlasted the compelling need which led to their initial imposition: airports have stopped being the focal point for activists’ attentions, as they have turned their sights on other targets as demonstrated by the evidence summarised in paragraph 73(3) above.

75. Cs say, taken together, the foregoing suggests two things which indicate that the threat remains and Cs’ concerns about the resumption of further incidents at the Airports is not misplaced:

76. First, the campaigners continue to maintain their strength of feeling about fossil fuels and/or climate change and continue to be prepared to engage in disruptive protest in order to draw attention to their causes and bring about their objectives [136 at ¶8.7]. The precise focus of certain campaigners has shifted as time has gone on, seemingly now including wealth inequality; but, many of the activists appear to be those formerly protesting under the JSO and XR banners and they have demonstrated that they continue to be prepared to use the same tactics.

77. Secondly, the other analysis of paragraph 73(3) above is that the injunctions have proved to be an effective deterrent and that protestors are prepared to ‘take their chances’ with the Criminal Courts but not where sites are protected by injunctions: ¶¶14.2-14.5 [141]. Cs infer that the apparent distinction between the Criminal Courts and the High Court injunctions in the protestors’ eyes stems from the number of examples of protestors not being found guilty of offences following criminal trials: ¶11.3 [139; 377-379; 380-382; 383-385; 386-387].
78. Indeed, Cs are concerned that, in removing the protection afforded by the injunctions, the Airports will become targets for such activity – especially given the examples of XR protests at or about airports in the last twelve months. As Swift J explained in *Exolum Pipeline System Limited v Persons Unknown* [2025] EWHC 1913 (KB) at ¶14 [AB/116-117]:
- “I fear that, once made, the need for orders such as this one can almost become self-perpetuating, in that any decision to remove the order would, from the point of view of the activists, wave a flag above these terminals marking their return to the category of targets for disruption. Even though Just Stop Oil and other likeminded organisations may be opportunistic, experience shows that they are also persistent and will take any opportunity that presents itself.”
79. This risk is particularly acute at airports where there is a premium on orderly conduct and which are acutely sensitive to chaos: ¶¶30 – 31 of Ritchie J Judgment [1208]; ¶¶13-14 HHJ Coe Judgment [778] and ¶6.3.1 of Mr Wright’s first statement for this hearing [130].
80. That is illustrated by the incident at London Southend Airport on 8 June 2026: ¶13.2 [140]. Although the students’ behaviour appeared, ultimately, to be innocent, the apparent connection with JSO and the seemingly erratic behaviour of the individuals caused police and security staff resources to be deployed to investigate and monitor them, resulting in a two hour delay.
81. The fear of chaos is, in part, because of the risk it poses from the point of view of terrorism. At ¶31, Ritchie J took this into account (“terrorism is facilitated by chaos” [1208]): he was there summarising evidence about the potential for even modest disruption to be treated by airport security as part of, or as a precursor to, a terrorist attack, out of an abundance of caution. The recently elevated terrorist threat only increases the risk of harm caused by protest activity at the Airports: there may be no ready way to tell, in the moment, whether disruptive protest activity is part of something more sinister.

(4) Other *Wolverhampton* factors

Full & frank disclosure

82. Cs have sought to address the points of full and frank disclosure occurring to them, as well as points which might be taken against them, in the course of this skeleton argument.

Just and convenient

83. In the round, therefore, this is a case where the relief has not outlasted the risk. It would be just and convenient to continue the injunctions.

The draft orders

84. For the most part, Cs' proposed orders [2008-2025; 2026-2028; 2029-2063; 2064-2100] replicate the form of the orders made by Bourne J at the first annual review, which Cs commend to the Court as the approach to take subject to any adjustments it considers appropriate in light of the practical operation of the injunctions and any changing circumstances: *Esso Petroleum Company Limited v. Persons Unknown* [2025] EWHC 1768 (KB) at ¶8 *per. Sweeting J* [AB/93]).
85. Experience suggests that the Court will wish to be taken through the form of order during the hearing. At this stage, there are two amendments which Cs seek to the orders, which fall within the type of adjustment envisaged by Sweeting J:
86. First, Cs ask the Court for permission to amend the claim forms to amend the description of Ds [394-405; 1571-1582; 1982-1993]. Although there are individual variations in the existing descriptions of Ds, Ds are defined by a connection to JSO or environmental campaign or their purpose being or including protest about fossil fuels or the environment.
87. Cs are concerned to ensure that the relief granted by the Court is effective and does not provide loopholes which protestors can exploit. The existing description might be said not to capture someone protesting under the banner of Take Back Power or in connection with its aims, which appear to focus on (or might be capable of being presented as if they focus on) wealth inequality, as distinct from the environment [332-336]. Cs all have private jet facilities and the direct action at Stansted Airport's private jet facilities in 2024 was one of the incidents which provoked the Airports to obtain the injunctions in question. Protests by XR in July 2025 and January 2026 focused at or about private jet facilities shows there is an overlap between the causes of wealth inequality and the ending of fossil fuel usage: ¶8.2.5.3 [135]. For that reason, Cs are concerned that they could become the focus of direct action by Take Back Power.
88. Further, Take Back Power appears to be the phoenix group created following the apparent cessation of JSO's activities: according to the Guardian Newspaper, many of those being involved in Take Back Power "having taking [sic] part in actions with [XR], Just Stop Oil, Animal Rising and other groups in recent years": ¶¶8.1.2(c) and 8.1.3 [133; 328]. Those involved with these groups are experienced and not un-sophisticated and will be alive to the potential loopholes in Court orders and/or might even be seeking to create them: ¶8.7 [136]. The names of the groups change, as does the precise formulation of their aims, but, fundamentally, the evidence suggests that there are individuals who

remain committed to disruptive protest at their targets.

89. This concern would not apply in the claims in respect of Manchester Airport, Stansted Airport and East Midlands. In that case, no amendment is necessary to capture those connected with Take Back Power or its cause given that, although the description mentions JSO and XR, it is not done restrictively and anyone protesting at those Airports would be captured.
90. Secondly, the byelaws have changed for London Luton Airport and East Midlands Airport. For the most part, there is no material change which impacts on the claims – albeit that some consequential tidying up of the relevant Particulars of Claim will be necessary to reflect the correct iteration of the byelaws [1098 and 1108; 1571-1572 and 1588].
91. In the case of London Luton Airport, the plan to the byelaws has been varied. Save for the landing lights which were not within the 2005 plan to the byelaws, but which were within the scope of the protection of the injunction, the red line to the plan to the Ritchie J Order for London Luton Airport mirrors the 2025 byelaws plan: ¶14 of the Amended Particulars of Claim [1135]. The 2025 byelaw plan was varied in 2025 includes the new areas of land which are outside of the existing red line. Cs do not seek the inclusion of those new areas [1573]. Additionally, two parts of the public highway have been removed in the 2025 byelaws plan, shown shaded red on the plan at [1362]. Cs propose the removal of these sections of highway from the red line boundary of the injunction and have effected that by also removing some of the land within 2025 byelaws in order to ensure there is a clear geographical scope in accordance with the guidance in *Wolverhampton* [1583].

Conclusion

92. The evidence shows that (1) the injunctions have proved an effective deterrent in preventing the sort of activity seen in 2024; (2) there continues to be a serious risk of that sort of activity resuming at the Airports, if the injunctions were to be discharged this year; and (3) these sites remain particularly sensitive to disruptive protest. Cs invite the Court to conclude that the circumstances are not sufficiently changed this year to suggest that the injunctions have outlasted the compelling need for them.

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LANDMARK CHAMBERS

24 June 2026

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 OR THE TAKE BACK POWER CAMPAIGN OR OTHER WEALTH INEQUALITY 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 RE-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 the Claimants’ application, by application notice dated 26 June 2026, to amend the description of the Defendant.

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 amendments ordered below review and, as provided for in paragraph 3 of the Injunction.
2. The Claimants have liberty to amend the name of the Defendants in the form set out in the heading to this order and to amend the Claim Form and Amended Particulars of Claim accordingly. Such amended statements of claim are to be served in accordance with the same method provided for by paragraph 9 of the Injunction.

3. The email addresses for notification contained in Schedule 3 to the Injunction shall also include: info@takebackpower.net and press@takebackpower.net.
4. The Warning Notice contained at Schedule 5 of the Injunction shall be updated to reflect the amendment to the description of the Defendant and to refer to the making of this order.
- 4.5. A conformed version of that Injunction reflecting the amendments ordered above is appended hereto for ease of reference.
- 5.6. 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 VARIED AND 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 OR THE TAKE BACK POWER
CAMPAIGN OR OTHER WEALTH INEQUALITY 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 **RE-**AMENDED PARTICULARS OF CLAIM**

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

[AND REFLECTING the variations to the original form of this order recorded in the subsequent orders recorded at the header to this Order.]

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:

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

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

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

FURTHER DIRECTIONS

14. The Claimants have permission to amend the Claim Form and Particulars of Claim so as to update the plan attached to the Particulars of Claim (and corresponding description of the Defendants) to the same form as the plan appended to this Order in Schedule 2 as Plan A.
15. The Claimants, any person who falls within or may fall within the description of the Defendants or any other person who is or may be affected by the Claim or this Order has liberty to apply to the Court to discharge or vary the Order and/or for further case-management directions.

16. No acknowledgment of service, admission or defence is required by any party until further so ordered.

COSTS

17. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

- (1) Akhil Markanday

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

- (2) Phil Spencer

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

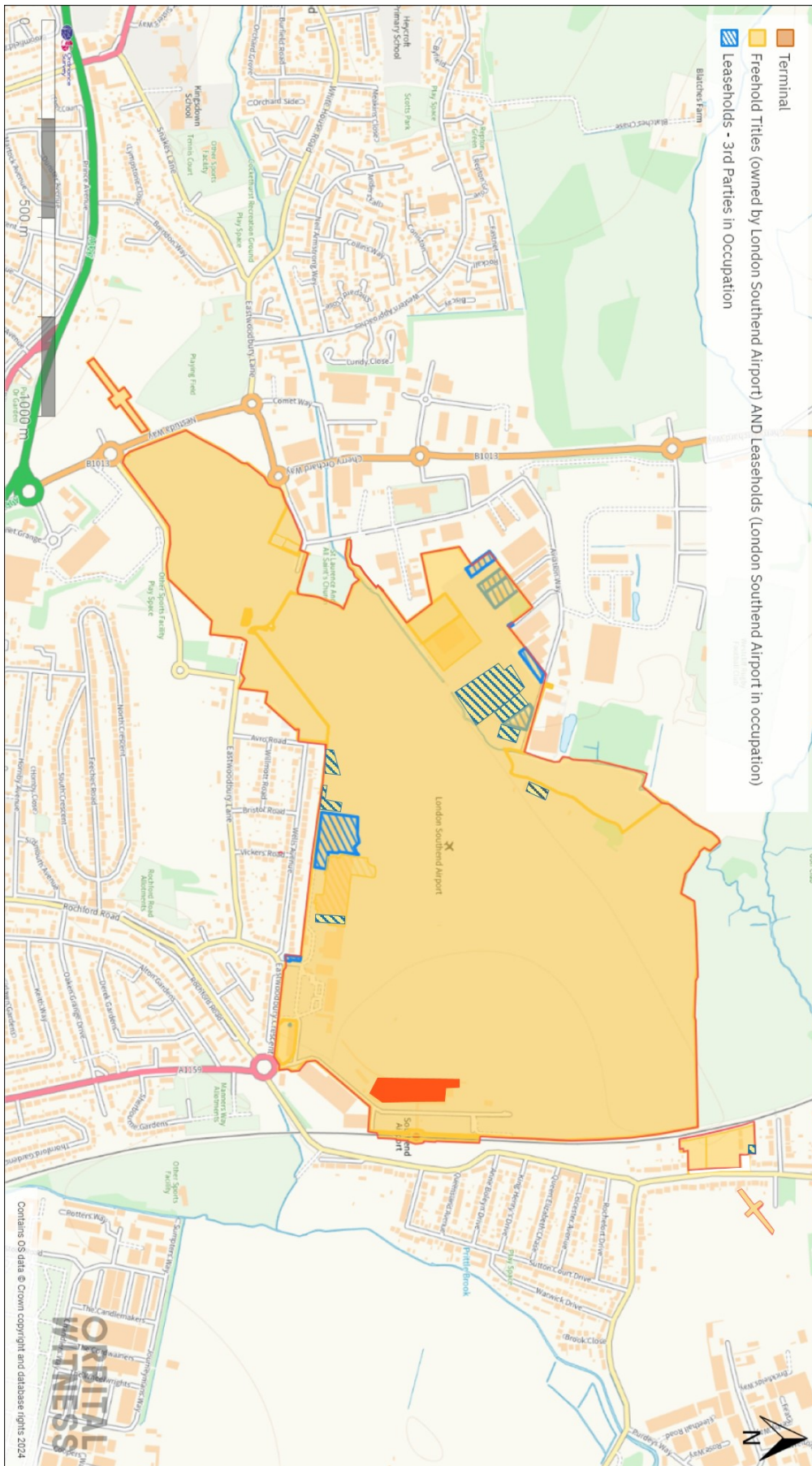
Dated: 14 August 2024

Continued and further varied: 2 July 2026

SCHEDULE 1 – CLAIMANTS’ UNDERTAKINGS TO THE COURT

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

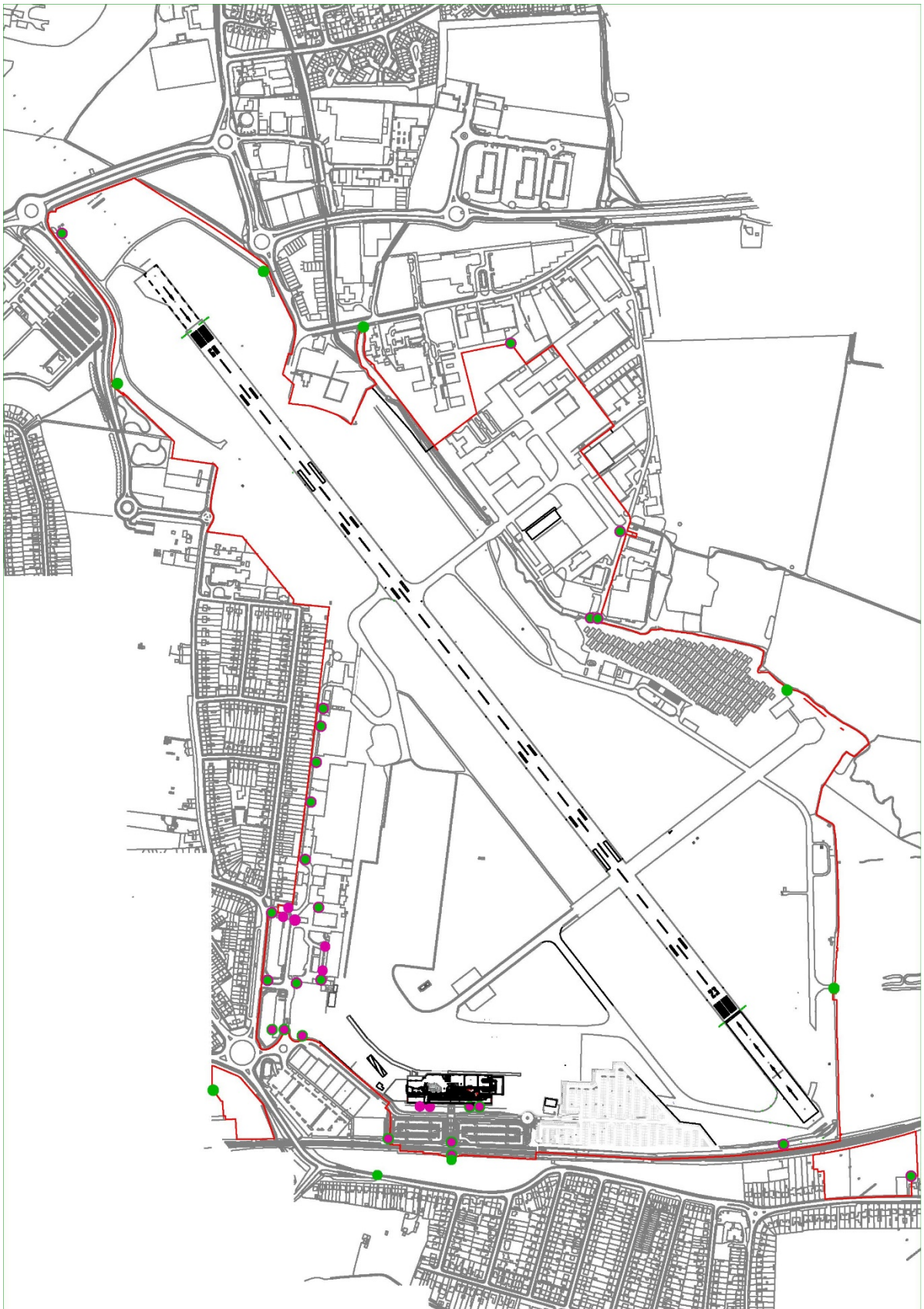
SCHEDULE 2 – PLAN A



SCHEDULE 3 – EMAIL ADDRESSES

1. juststopoil@protonmail.com
2. juststopoilpress@protonmail.com
3. info@juststopoil.org
4. press@takebackpower.net
5. info@takebackpower.net

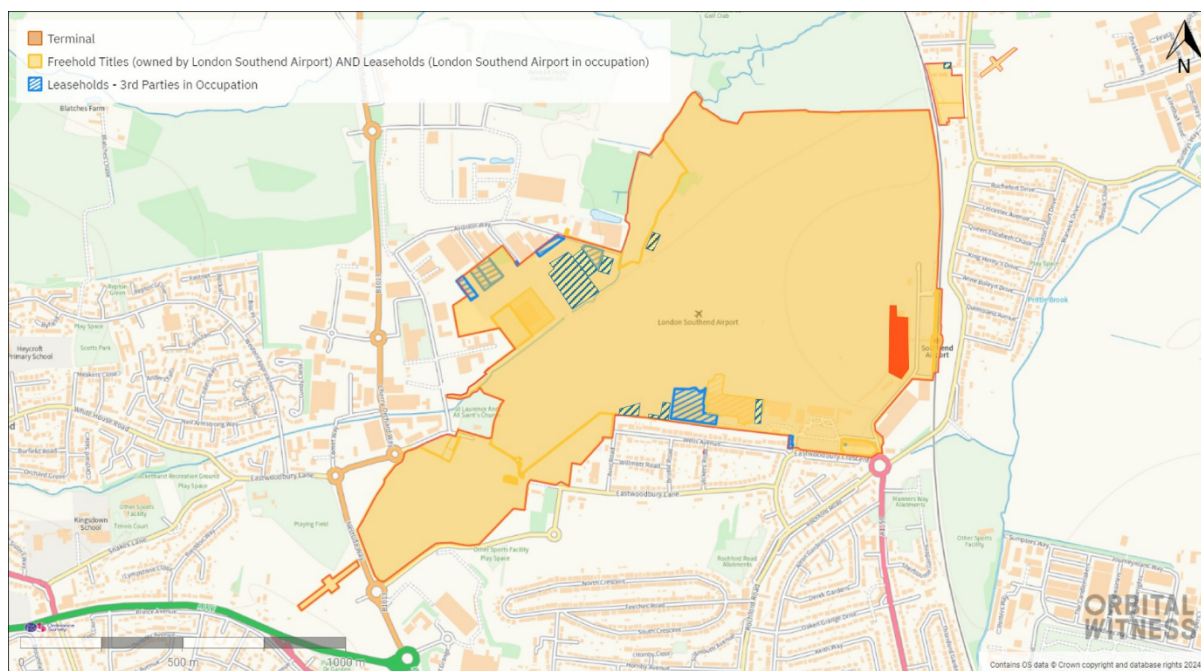
SCHEDULE 4 – PLAN B



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. It was continued on the second annual review hearing on 2 July 2026. 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 OR TAKE BACK POWER OR OTHER WEALTH INEQUALITY 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, and all materials filed in the first and second annual review hearings) can be viewed at <http://londonouthendairport.com/corporate/injunction> or obtained from:

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

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

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

Re-amended pursuant to the Order of [] dated [] July 2026

IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002596

KINGS 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 OR THE TAKE BACK POWER CAMPAIGN OR OTHER WEALTH INEQUALITY 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 RE-AMENDED PARTICULARS OF CLAIM

Defendants

RE-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 Re-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 [Re-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.

12A. The Defendants are also (alternatively include) wealth inequality activists, associated with the “Take Back Power” campaign or otherwise. Take Back Power (or those behind such campaign) are associated with Just Stop Oil. Just Stop Oil’s website advertises Take Back Power as a “New Project”.

12B. Take Back Power’s website expresses an intention to “undertake nonviolent action to resist the super-rich”. Whilst the primary target of that action appears to be the “super-rich”, Take Back Power’s website also suggests the threat of direct action may in part be motivated by environmental concerns. The website states that the super-rich “profit from [...] heating the world to boiling point”.

12C. Since December 2025 Take Back Power have undertaken direct action activities directed at luxury retailers and a hotel in London, as further detailed in the Third Witness Statement of Philip Keith Spencer filed in these proceedings.

12D. In the premises, the Claimants infer and so allege that (unless otherwise restrained) the Defendants (or some of them) will commit acts of disruptive direct action at the Airport (including those methods particularised at paragraph 11 above), in connection with or (ostensibly) motivated by wealth inequality concerns (whether instead of or in addition to environmental concerns). Without prejudice to the generality of that allegation, the Claimants infer that the Airport would be a likely target for those activities because of:

- a likely perception on behalf of the Defendants that the “super rich” are disproportionate users of air travel; and
- the fact that the Airport includes a “Jet Centre”, offering private aviation services which (the Defendants will perceive) are predominantly used by the “super rich”.

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

TOM ROSCOE

Wilberforce Chambers

Statement of Truth

The Claimants believe that the facts stated in this **Re-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.

.....

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.

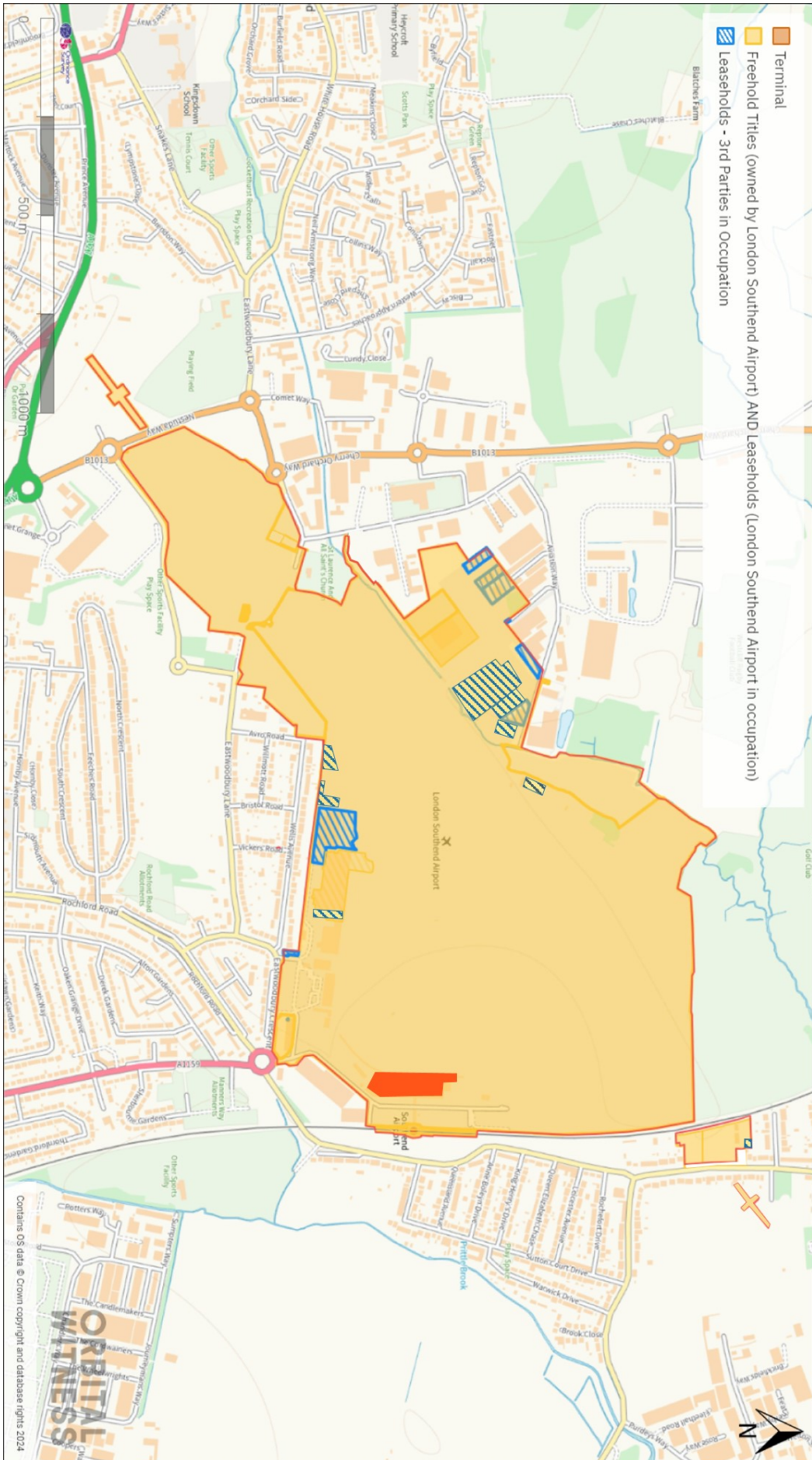
The Second Claimant

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



Made on behalf of the Claimants
Witness: Philip Keith Spencer
Number of Statement: Fourth
Exhibit: N/A
Dated: 1 July 2026

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

FOURTH 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 fourth 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 certify the actions taken by the Claimants and/or BCLP acting on behalf of the Claimants, to further comply with the notification requirements as set out within the Order of The Honourable Mrs Justice Farbey dated 14 August 2024 (the “**Order**”). In particular, this statement covers the actions taken by the Claimants to notify the Defendants of documents in relation to the second annual review hearing listed to be heard on 2 July 2026 (the “**Second Review Hearing**”). It is intended to amount to the “Certificate of Service” required by paragraph 11.2 of the Injunction. I am providing it in the form of a witness statement in order to provide greater detail of the steps that have been taken than could conveniently be included in a certificate.

Previous Service

5. Details of notification of the original Order, notice of the first review hearing and application notice relating to the first review hearing on 22 October 2025 (the “**First Review Hearing**”) are set out in my First and Second Witness Statements. See in particular:
 - 5.1. Paragraph 9 of my First Witness Statement for details of notification of the original Order;
 - 5.2. Paragraphs 46 – 47.4 of my First Witness Statement for details of notification of the First Review Hearing and Application made by the Claimants in relation to the First Review Hearing; and

- 5.3. Paragraphs 8 – 9 of my Second Witness Statement for details of notification of the bundle of documents for the First Review Hearing.
6. Details of notification of the order made at the First Review Hearing are set out in my Third Witness Statement at paragraph 35. I wish to add that copies of the order made at the First Review Hearing were also affixed at the locations marked with a green or purple dot on Plan B to the Order and a copy of the order was also made available at the Train Station. We are informed by the Claimants that these steps were taken by 13:23 on 31 October 2025.
7. Details of publication of the Second Review Hearing listing on Southend’s website at <https://londonsouthendairport.com/corporate/injunction/> (the “**Website**”) are set out at paragraph 37 of my Third Witness Statement.

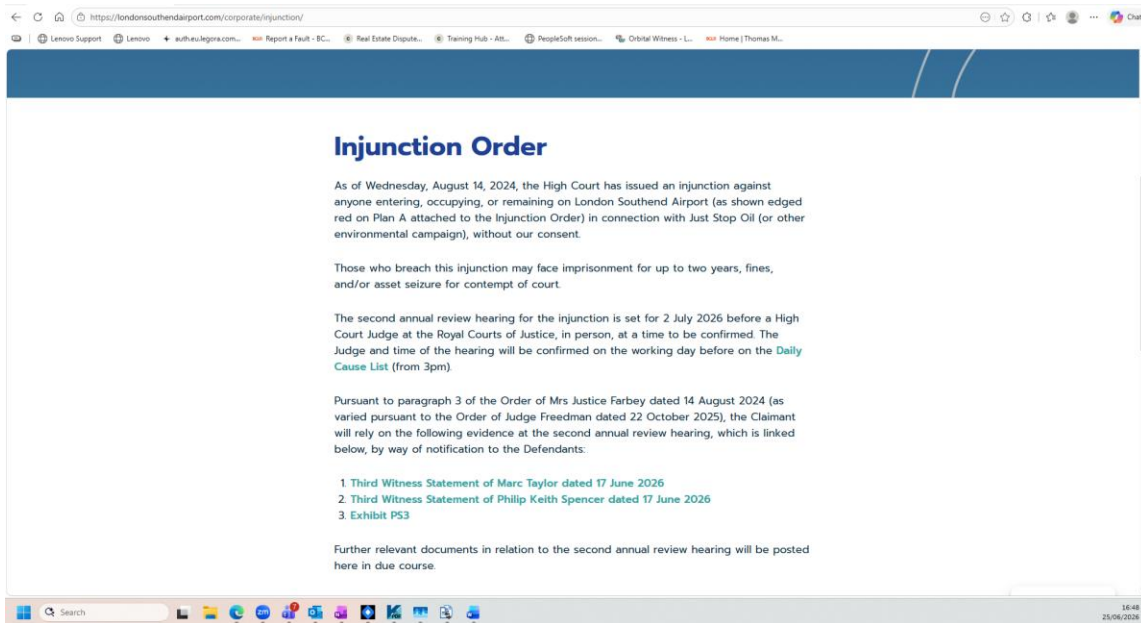
Further Service

8. The Claimants and/or BCLP acting on behalf of the Claimants have undertaken the following further steps since my Third Witness Statement in relation to the Second Review Hearing.

Notification of the Second Review Hearing

9. BCLP notified the Defendants of listing of the Second Review Hearing by email to the email addresses listed in Schedule 3 of the Order at 22:04 on 17 June 2026.

10. As above at paragraph 7 and set out in paragraph 37 of my Third Witness Statement, the Claimants added details of the Second Review Hearing to the Website on 9 June 2026. A screenshot of the text displayed on the Website is below. The Notice of Hearing in relation to the Second Review Hearing which was emailed to BCLP was also uploaded to the website as part of Exhibit PS3 to my Third Witness Statement.



Notification of evidence to be relied upon by the Claimants at the Second Review Hearing

11. The Defendants were notified of the further evidence to be relied upon by the Claimants at the Second Review Hearing¹ (the “**Second Review Hearing Evidence**”) as follows:
- 11.1. The Claimants uploaded copies of the Second Review Hearing Evidence to the Website on 17 June 2026. I am informed by the Claimants that this took place approximately around 20:38 – 21:00; and
- 11.2. BCLP confirmed the availability of the Second Review Hearing Evidence on the Website by email to the email addresses listed in Schedule 3 of the Order at 22:04 on 17 June 2026.

¹ The Third Witness Statement of Marc Taylor dated 17 June 2026; the Third Witness Statement of Philip Keith Spencer dated 17 June 2026 and Exhibit PS3.

12. The Defendants were notified of the bundle to be used for the Second Review Hearing (the “**Second Review Hearing Bundle**”) as follows:
 - 12.1. The Claimants made the Second Review Hearing Bundle available for electronic download on the Website on 25 June 2026. I am informed by the Claimants that this took place approximately at 08:43;
 - 12.2. BCLP confirmed the availability of the Second Review Hearing Bundle for electronic download on the Website by email to the email addresses listed in Schedule 3 of the Order on 25 June 2026 at 08:56; and
 - 12.3. The Claimants have confirmed to me that a hard copy of the Second Review Hearing Bundle has been made available at the Train Station (consistent with the contents of the Warning Notice at Schedule 5 of the Order) and was first made available on 27 June 2026.

The Claimants’ application dated 26 June 2026

13. On Friday 26 June 2026, the Claimants filed with the Court an application to amend the Claim so as to extend the definition of the Defendants to include persons unknown who act in connection with “*the Take Back Power campaign or other wealth inequality campaign*” (the “**Application**”). The following steps have been taken to notify the Defendants of the Application:
 - 13.1. The Claimants filed the Application at 18:38 on Friday 26 June. As at the time of giving this statement, no sealed Application has yet been received back from the Court.
 - 13.2. BCLP emailed the Application documents in draft to the email addresses listed in Schedule 3 of the Order at 19:11 on Friday 26 June.
 - 13.3. The Claimants affixed notices at the locations marked with a green or purple dot on Plan B to the Order stating that the Application has been made and where it can be accessed in hard copy and online on Saturday 27 June. An image of the form of notice is set out below:

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002596

NOTICE OF APPLICATION DATED 26 JUNE 2026

TO: Persons Unknown who, in connection with the Just Stop Oil or other environmental campaign, enter, occupy or remain (without the Claimants' consent) upon that area of land known as London Southend Airport (as shown for identification edged red on the plan A attached to the Amended Particulars of Claim) (the "**Defendants**")

Notice is hereby given that an application, dated 26 June 2026, has been made to amend the description of the Defendant and to amend the Claim Form and Particulars of Claim to record that change in these proceedings.

A copy of the relevant application and accompanying documents in draft, together with copies of all relevant documents concerning these proceedings may:

1. be viewed at: <https://londonouthendairport.com/corporate/injunction>; and
2. also be obtained from the Ticket Office, Southend Airport Train Station, Southend-on-Sea, Essex SS2 6YF (open between 9am–5pm Monday–Friday); or
3. by contacting Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR; or
4. by contacting Phil Spencer of Bryan Cave Leighton Paisner LLP by email: Phil.Spencer@bcplaw.com

The final sealed application documents will also be made available as above upon receipt of the sealed application from the Court.

London Southend Airport Company Limited

London Southend Solar Limited

Thames Gateway Airport Limited

13.4. The Claimants uploaded the Application documents in draft to the Website on Sunday 28 June. BCLP accordingly sent a further email to the email addresses listed in Schedule 3 of the Order at 15:51 on Sunday 28 June by way of notification that the Application documents are now accessible on the Website.

14. BCLP also:

14.1. Emailed info@takebackpower.net and press@takebackpower.net at 19:17 on Friday 26 June to inform the Take Back Power organisation of the Second Review Hearing and the Application. Again, the Application documents were attached in draft.

14.2. Emailed info@takebackpower.net and press@takebackpower.net at 15:51 on Sunday 28 June to inform the Take Back Power organisation that the Application documents in draft had been uploaded to the Website. These are the “general” and “press” email addresses recorded on the TBP website (and, aside from a fundraising (“giving”) email address, are the only means of contact known to the Claimants).

15. Upon receipt of the sealed Application from the Court, the Claimants/BCLP shall:
 - 15.1. upload the sealed Application documents to the Website;
 - 15.2. email the sealed Application documents to the email addresses listed in Schedule 3 of the Order;
 - 15.3. email the sealed Application documents to info@takebackpower.net and press@takebackpower.net; and
 - 15.4. make the sealed Application documents available at the Train Station.
16. As stated above in paragraph 13.1, the Claimants still await a sealed application notice. Accordingly, the Claimants consider they have taken as many prudent steps as possible at this stage in order to notify the Defendants of the intended Application.

Notification of skeleton argument and authorities bundle

17. On Monday 29 June before 16:00, the Claimants filed their skeleton argument for the Second Review Hearing and an accompanying authorities bundle. The Claimants/ BCLP have taken the following steps to notify the Defendants of those documents:
 - 17.1. The Claimants' skeleton argument and authorities bundle were uploaded to the Website at approximately 18:01 on 29 June 2026;
 - 17.2. BCLP confirmed the availability of the skeleton argument and authorities bundle for electronic download on the Website by email to the email addresses listed in Schedule 3 of the Order on 29 June 2026 at 20:14.
 - 17.3. The Claimants also made hard copies of the skeleton argument and authorities bundle available at the Train Station at approximately 18:04 on 29 June 2026.
 - 17.4. BCLP also confirmed the availability of the skeleton argument and authorities bundle for electronic download on the Website by email to

info@takebackpower.net and press@takebackpower.net on 29 June 2026 at 20:16.

18. The Claimants intend to prepare a supplementary bundle for the Second Review Hearing with documents which post-date the existing filed bundle. Such supplementary bundle will be filed and hard copies will be brought to the Second Review Hearing for any interested parties, and to hand up to the Judge as necessary.
19. As at the time of this statement, neither BCLP nor the Claimants have received any further correspondence or requests in relation to the previously notified documents, the Second Review Hearing Evidence, the Second Review Hearing Bundle nor the Application.

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
656A88CC3CB4E1.....

Philip Keith Spencer

1 July 2026