

BETWEEN

**VARIOUS AIRPORTS
AS MORE PARTICULARLY DESCRIBED IN
THE (AMENDED) CLAIM FORMS**

Claimants

and

**PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN
THE (AMENDED) CLAIM FORMS**

Defendant

**SUPPLEMENTAL HEARING BUNDLE
30 JUNE 2026**

London City Airport Claim No: KB – 2024 – 001765		Date	Page No.
LCY	Draft Order (LCY Draft Order is exhibited at pages 2008 to 2025)	30.06.2026	8 – 27 (pages left intentionally blank)
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AJW2 – the 2025 Order		-	160 - 178
AJW3 – Judgment of Bourne J (2025)		-	179 - 189
AJW4 – Printout of London City Airport's injunction website		-	190 - 191
AJW5 – Plans to the 2024 Orders		-	192 - 193
AJW6 – Email from Alexander Wright dated 9 June 2026 serving the 2025 Order		-	194 - 196
AJW7 – Plan 1 (London City Airport) to the 2024 Order		-	197 - 198
AJW8 – Printout from Reuters website showing protest activity by Extinction Rebellion		-	199 - 217
AJW9 – Printout from MI5's website		-	217 - 226
AJW10 – Chronology of protest incidents		-	227 - 305
AJW11 – Printout from the Just Stop Oil website		-	306 - 310
AJW12 – Printout from the Take Back Power website		-	311 - 312
AJW13 – Printout from the Take Back Power website		-	313 - 314

AJW14 – Printouts from the Just Stop Oil website and affiliated social media channels	-	315 - 325
AJW15 – Article in the Guardian newspaper from 25 April 2025	-	326 – 330
AJW16 – Printout from the Take Back Power website	-	331 - 333
AJW17 – Printout from the Take Back Power website	-	334 – 335
AJW18 – Printout from the Take Back Power website	-	336 – 338
AJW19 – Printout from the Take Back Power website	-	339 - 364
AJW20 – Printout from the Just Stop Oil website	-	365 - 368
AJW21 – Printout from the Fossil Free London website	-	369 – 370
AJW22 – Printout from the Youth Demand website	-	371 - 372
AJW23 – Various printouts of news articles	-	373 – 391
AJW24 – Briefing note reporting on incident at London Southend Airport on 8 June 2026	-	392 – 393
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All Airports		
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AJW3 – Printout of relevant injunction websites	-	577 - 587
AJW4 – Emails sent by Alexander Wright on 11 and 12 June 2026	-	588 – 595
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Judgment of HHJ Coe KC		24.07.2024	775 - 782
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Note of Hearing		24.06.2025	786 - 787
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AJW10 – Chronology of protest incidents		-	931 – 1009
AJW11 – Printout from the Just Stop Oil website		-	1010 – 1014
AJW12 – Printout from the Take Back Power website		-	1015 - 1016
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AJW14 – Printouts from the Just Stop Oil website and affiliated social media channels		-	1019 – 1029
AJW15 – Article in the Guardian newspaper from 25 April 2025		-	1030 – 1034
AJW16 – Printout from the Take Back Power website		-	1035 – 1037
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AJW18 – Printout from the Take Back Power website		-	1040 - 1042
AJW19 – Printout from the Take Back Power website		-	1043 – 1068
AJW20 – Printout from the Just Stop Oil website		-	1069 – 1072
AJW21 – Printout from the Fossil Free London website		-	1073 – 1074
AJW22 – Printout from the Youth Demand website		-	1075 – 1076
AJW23 – Various printouts of news articles		-	1077 – 1095
AJW24 – Briefing note reporting on incident at London Southend Airport on 8 June 2026		-	1096 - 1097
Claimant’s Application dated 18 June 2026			
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Draft Re-Amended Particulars of Claim		18.06.2026	1104 - 1118

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Claim No: KB – 2024 - 002317			
LBA / LTN / NCL	Draft Order (LBA / LTN / NCL Draft Order is exhibited at pages 2029 to 2063)	30.06.2026	1119 – 1121 (pages left intentionally blank)
Statements of Case			
Amended Claim Form		23.07.2024	1122 – 1130
Amended Particulars of Claim		23.07.2024	1131 – 1156
Court Documents			
Injunction Order of Ritchie J (Amended under the slip rule on 19.07.24 and 22.7.24)		19.07.2024	1157 - 1188
Order Granting Permission to Amend		23.07.2024	1189 – 1191
Note of Hearing		18.07.2024	1192 – 1198
Judgment of Ritchie J		18.07.2024	1199 - 1212
Order of Bourne J		24.06.2025	1213 – 1215
Note of Hearing		24.06.2025	1216 – 1217
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2026 Review Hearing Application		02.06.2026	1228 - 1233
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AJW3 – Judgment of Bourne J (2025)		-	1305 – 1315
AJW4 – Printout of each of the airports’ injunction websites		-	1316 – 1319
AJW5 – Plans to the 2024 Orders		-	1320 – 1323
AJW6 – Email from Alexander Wright dated 9 June 2026 serving the 2025 Order		-	1324 – 1326
AJW7 – Plan 1, 2 and 3 to the 2024 Orders		-	1327 – 1330
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AJW9 – Title register and title plan of BD230068		-	1356 – 1360
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AJW11 – Title register and title plan of HD544934		-	1363 – 1367
AJW12 – Title register and title plan of BD146644		-	1368 – 1375
AJW13 – New plans		-	1376 – 1379
AJW14 – Printout from MI5’s website		-	1380 – 1388
AJW15 – Chronology of protest incidents		-	1389 – 1467
AJW16 – Printout from the Just Stop Oil website		-	1468 – 1472
AJW17 – Printout from the Take Back Power website		-	1473 - 1474
AJW18 – Printout from the Take Back Power website		-	1475 – 1476
AJW19 – Printouts from the Just Stop Oil website and affiliated social media channels		-	1477 – 1487
AJW20 – Article in the Guardian newspaper from 25 April 2025		-	1488 – 1492
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AJW23 – Printout from the Take Back Power website		-	1498 – 1500
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AJW26 – Printout from the Fossil Free London website		-	1531 – 1532
AJW27 – Printout from the Youth Demand website		-	1533 – 1534
AJW28 – Various printouts of news articles reporting outcome of criminal convictions		-	1535 – 1553
AJW29 – Various printouts of news articles reporting protests by GALBA		-	1554 - 1568
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Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport		Date	Page No.
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BHX / LJLA / BRS	Draft Order (BHX / LJLA / BRS Draft Order is exhibited at pages 2064 to 2100)	30.06.2026	1604 – 1606 (pages left intentionally blank)
Statements of Case			
Amended Claim Form		31.07.2024	1607 – 1626
Amended Particulars of Claim		31.07.2024	1627 - 1653
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Note of Hearing		06.08.2024	1689 – 1697
Order of Bourne J		24.06.2025	1698 – 1700
Note of Hearing		24.06.2025	1701 – 1702
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2026 Review Hearing Application		02.06.2026	1713 – 1718
2026 Review Hearing Order		16.06.2026	1719 – 1720
Formal Listing Notice		19.06.2026	1721 - 1722
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Witness Statement of Alexander James Wright		11.06.2026	1723 – 1741
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AJW2 – the 2025 Orders		-	1776 – 1779
AJW3 – Judgment of Bourne J (2025)		-	1780 – 1790
AJW4 – Printout of each of the airports’ injunction websites		-	1791 – 1794
AJW5 – Plans to the 2024 Orders		-	1795 – 1798
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AJW8 – Printout from MI5’s website		-	1806 – 1814
AJW9 – Chronology of protest incidents		-	1815 – 1893
AJW10 – Printout from the Just Stop Oil website		-	1894 – 1898
AJW11 – Printout from the Take Back Power website		-	1899 – 1900
AJW12 – Printout from the Take Back Power website		-	1901 – 1902
AJW13 – Printouts from the Just Stop Oil website and affiliated social media channels		-	1903 – 1913
AJW14 – Article in the Guardian newspaper from 25 April 2025		-	1914 – 1918
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AJW18 – Printout from the Take Back Power website		-	1927 – 1952
AJW19 – Printout from the Just Stop Oil website		-	1953 - 1956
AJW20 – Printout from the Fossil Free London website		-	1957 – 1958
AJW21 – Printout from the Youth Demand website		-	1959 – 1960
AJW22 – Various printouts of news articles		-	1961 – 1979
AJW23 – Briefing note reporting on incident at London Southend Airport on 8 June 2026		-	1980 - 1981
Claimant’s Application dated 18 June 2026			
Application Notice		18.06.2026	1982 – 1987
Draft Re-Amended Claim Form		18.06.2026	1988 – 1993
Draft Re-Amended Particulars of Claim		18.06.2026	1994 - 2007

All Airports – Draft Orders			
Claim Nos: KB – 2024 -1765, 2132, 2317 and 2473			
LCY	Draft Order	30.06.2026	2008 - 2025
MAN / STN / EMA	Draft Order	30.06.2026	2026 - 2028
LBA / LTN / NCL	Draft Order	30.06.2026	2029 - 2063
BHX / LJLA / BRS	Draft Order	30.06.2026	2064 - 2100

Previous Hearing Bundles

Supplemental Bundle – First Review Hearing on 24 June 2026 - [mag_supplemental-hearing-bundle-v2_opt.pdf](#)

Initial Hearing Bundle - London City Airport - Claim No: KB – 2024 – 001765 – 20 June 2024 - [downloads.ctfassets.net/lmkdg513arga/3caGkPret2cnyQorbXFbF0/5ed885062ca27221167deec699ebb4e2/Hearing_Bundle.pdf](#)

Initial Manchester Airport, Stansted Airport and East Midlands Airport - Claim No: KB – 2024 – 002132 – 5 July 2024 - [injunction-mag-hearing-bundle.pdf](#)

Initial Leeds Bradford Airport, London Luton Airport and Newcastle International Airport - Claim No: KB – 2024 – 002317 – 18 July 2024 - [app-lbal01saas99pjp001.cms.optimizely.com/globalassets/blocks/legal-tcs/injunction/5---kb-2024-002317--hearing-bundle---paginated230473211.1-as-filed-1.pdf](#)

Initial Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport - Claim No: KB – 2024 – 002473 – 6 August 2024 - [downloads.ctfassets.net/qacv5m4pr8sy/2R2DYqKg9EP9JER12btJUp/e31206c76c1e5c1dddb95397c178350f/BHX_Hearing_Bundle.pdf](#)

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

Draft Order

This exhibit appears at pages 2008 to 2025.

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Claim Form

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

In the	High Court of Justice King's Bench Division
Fee Account no.	PBA 0087211
Help with Fees - Ref no. (if applicable)	H W F - <input type="text"/> <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/>

	For court use only
Claim no.	
Issue date	

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

- (1) London City Airport Limited of London City Airport, City Aviation House, Royal Docks, London E16 2PB
- (2) Docklands Aviation Group Limited of City Aviation House, London City Airport, Royal Docks, London E16 2PB



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

Persons Unknown who, in connection with the Just Stop Oil or other environmental campaign, enter occupy or remain (without the Claimants' consent) upon that area of land known as London City Airport (as shown for identification edged red on the attached Plan 1) but excluding those areas of land as further defined below

Brief details of claim

The Claimants seek an injunction to restrain the Defendant from acts of trespass and/or nuisance on the land edged red on Plan 1 but excluding:-

- (1) the land and buildings coloured blue on Plan 1
- (2) the defined areas coloured pink and purple on Plan 1
- (3) those parts of buildings edged blue on the attached Plans 2 - 8.

The Claimants also seek costs and further and/or other relief

Value

This is a non monetary claim

Defendant's name and address for service including postcode

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

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

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

Claim no.

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

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

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

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

- No

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

- Yes
 No

Claim no.

Particulars of Claim

attached

to follow

Statement of truth

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

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

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

Signature



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

Date

Day Month Year

11	06	2024
----	----	------

Full name

Stuart Sherbrooke Wortley

Name of claimant's legal representative's firm

Eversheds Sutherland (International) LLP

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

Partner

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

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Postcode

E C 2 V 7 W S

If applicable

Phone number

DX number

Your Ref.

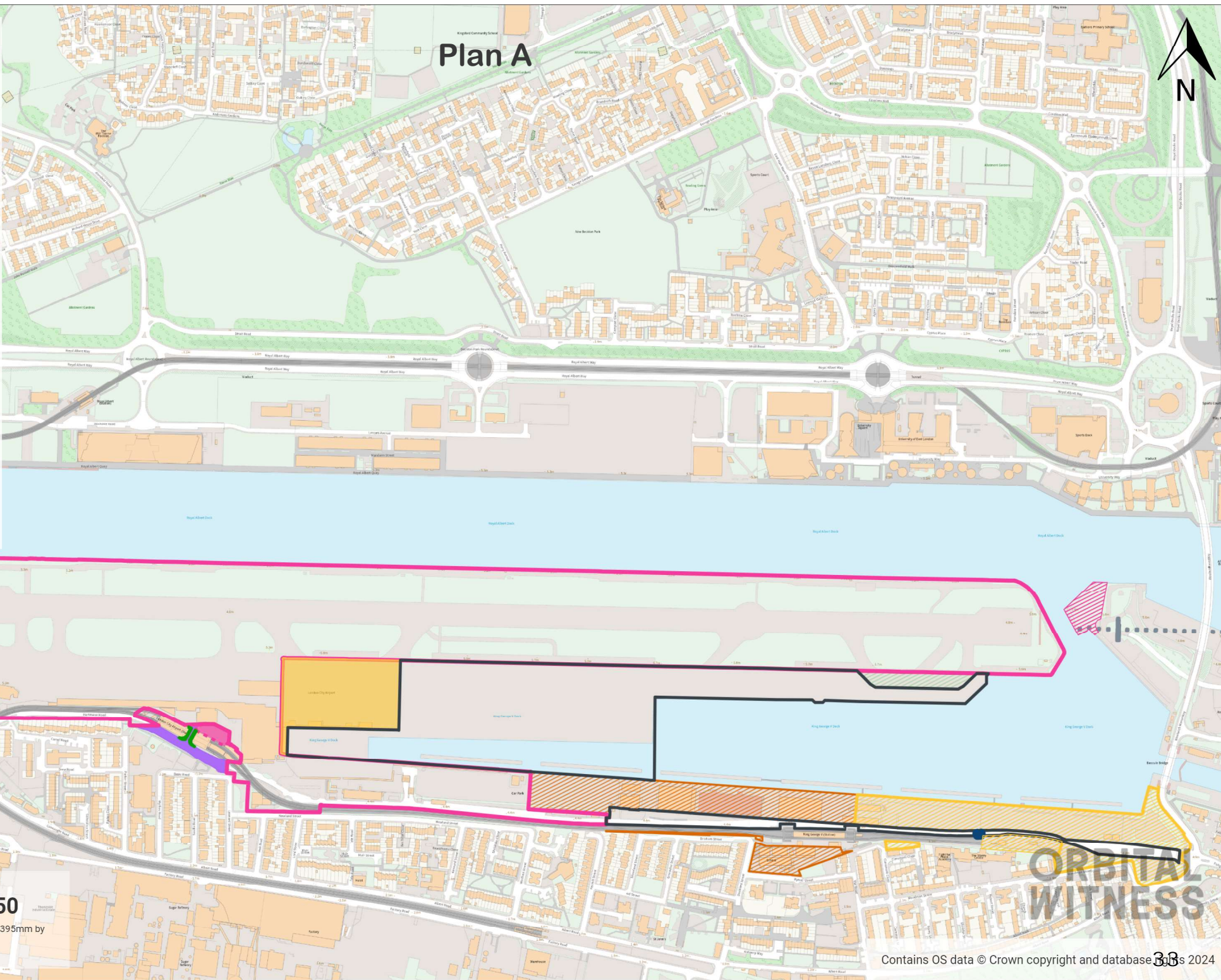
WortleyS/292659.000057

Email

Plan A



-  TGL469846
-  EGL527797
-  EGL527799
-  TGL617976
-  EGL555153
-  EGL519692
-  EGL552140
-  EGL518399
-  TGL530134
-  TGL338199
-  EGL291578
-  EGL465048
-  EGL373364
-  Albert Island



Map scale 1:5,650

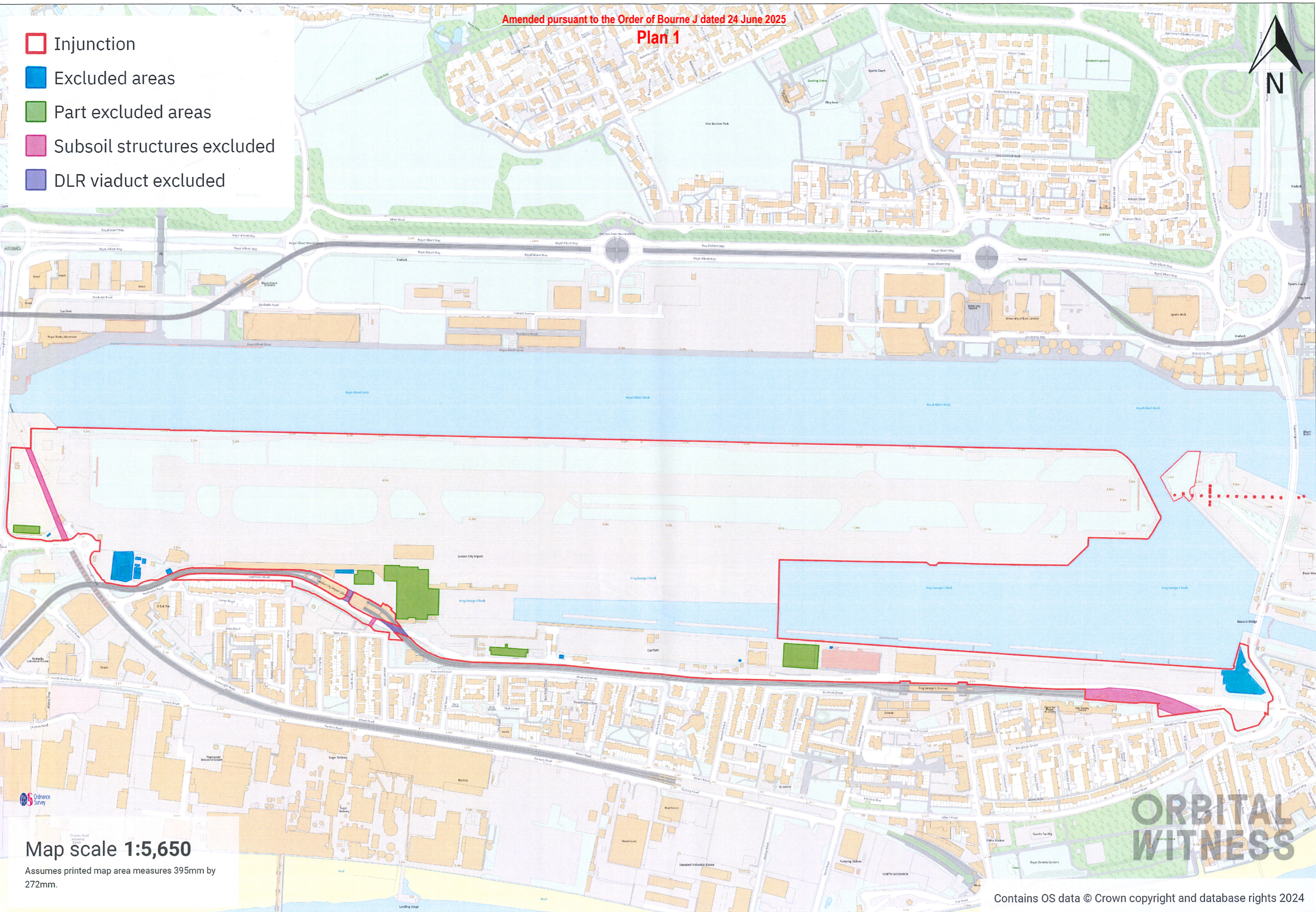
Assumes printed map area measures 395mm by 272mm.

**ORBITAL
WITNESS**

Plan 1



- Injunction
- Excluded areas
- Part excluded areas
- Subsoil structures excluded
- DLR viaduct excluded



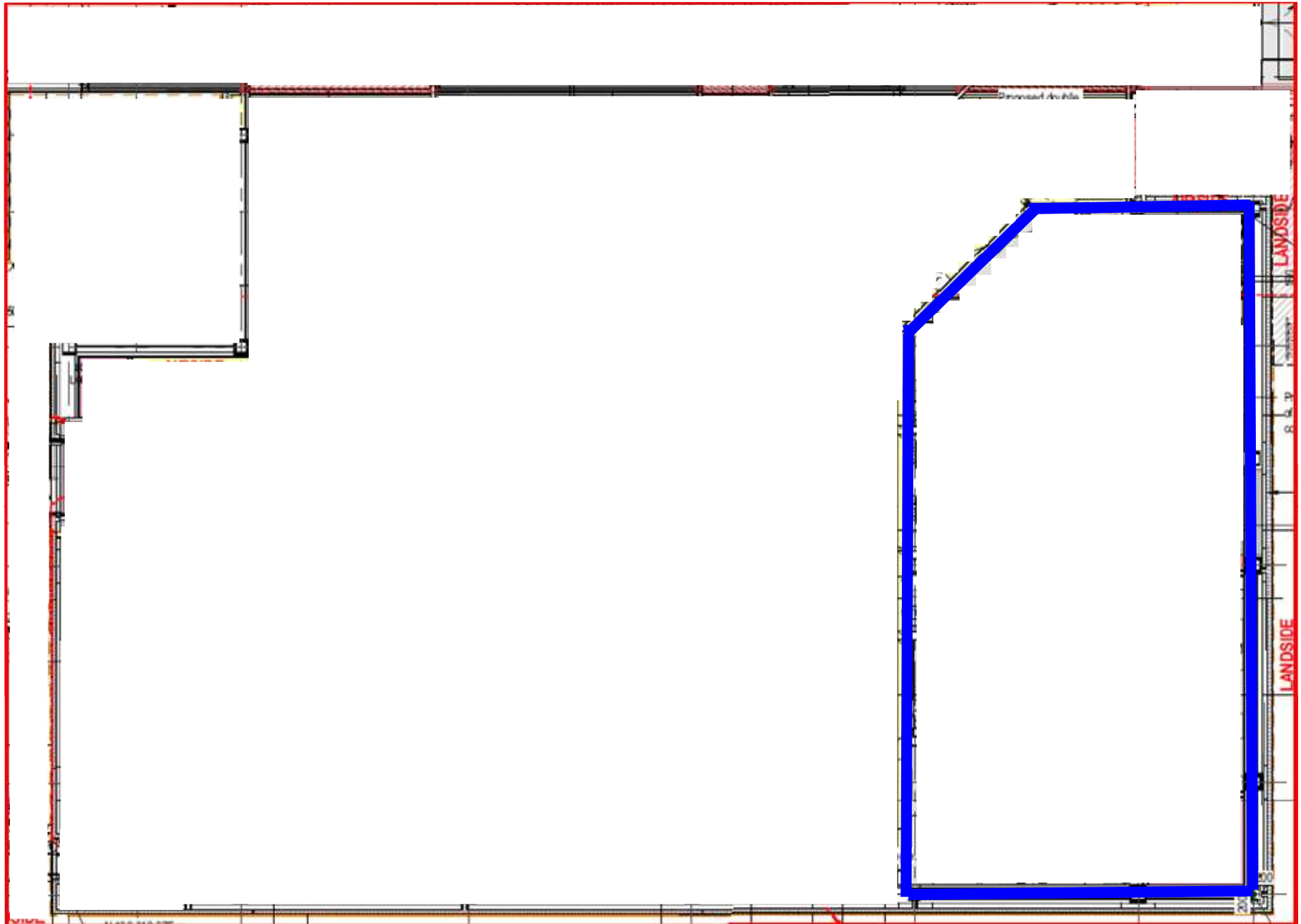
Map scale 1:5,650

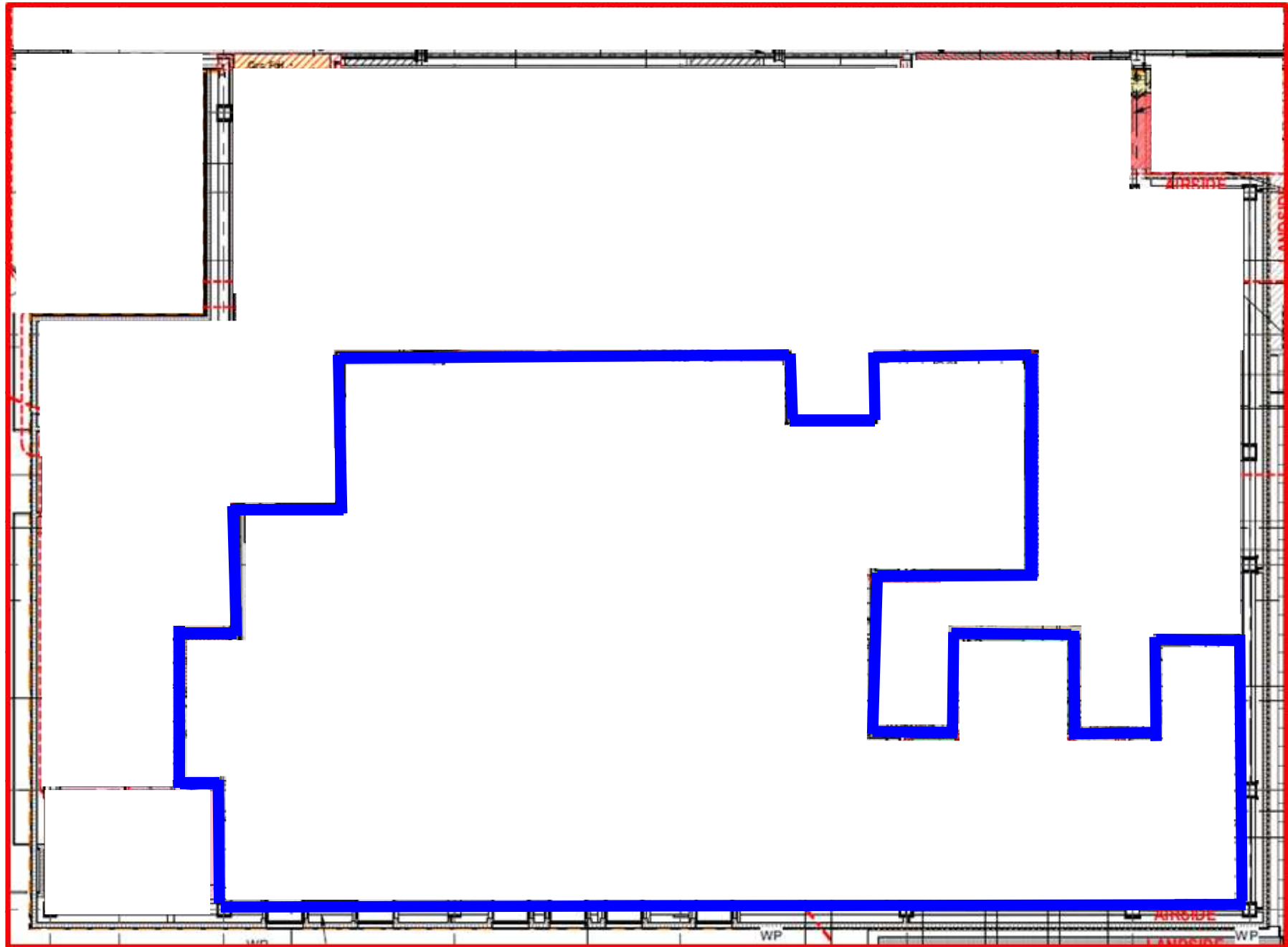
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ORBITAL WITNESS



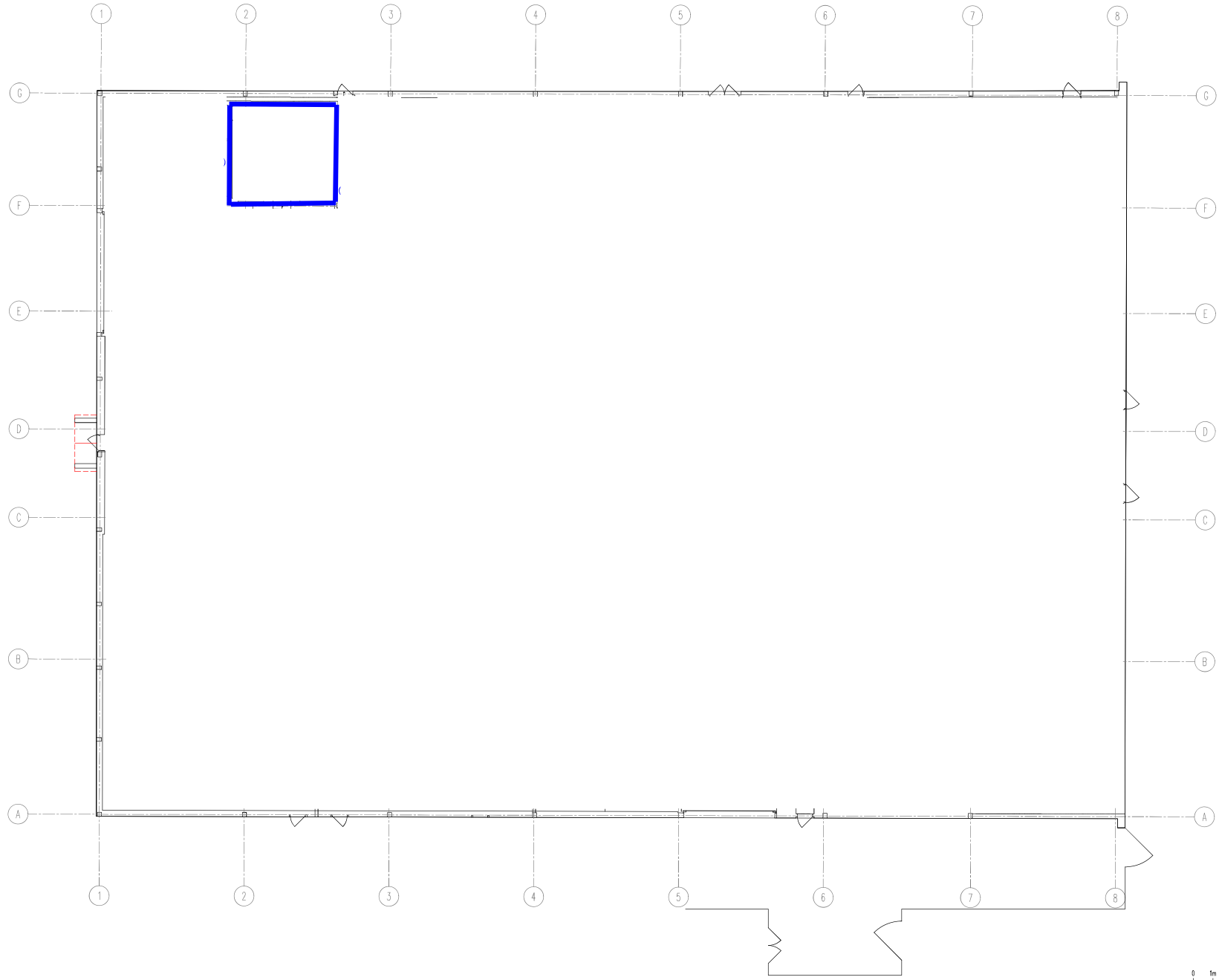




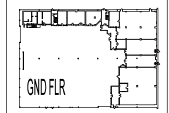
Blue Shed - Ground Floor

Plan 5

General Notes:



B Room Numbers Added	01/11/16
A Door Numbers Added	01/03/16



London City Airport, City Aviation House
Royal Docks, London, E16 2PB
RECORD DRAWING

BLUE SHED
Ground Floor
General Arrangement Plan
04/08/15
R/BS/001
1:100



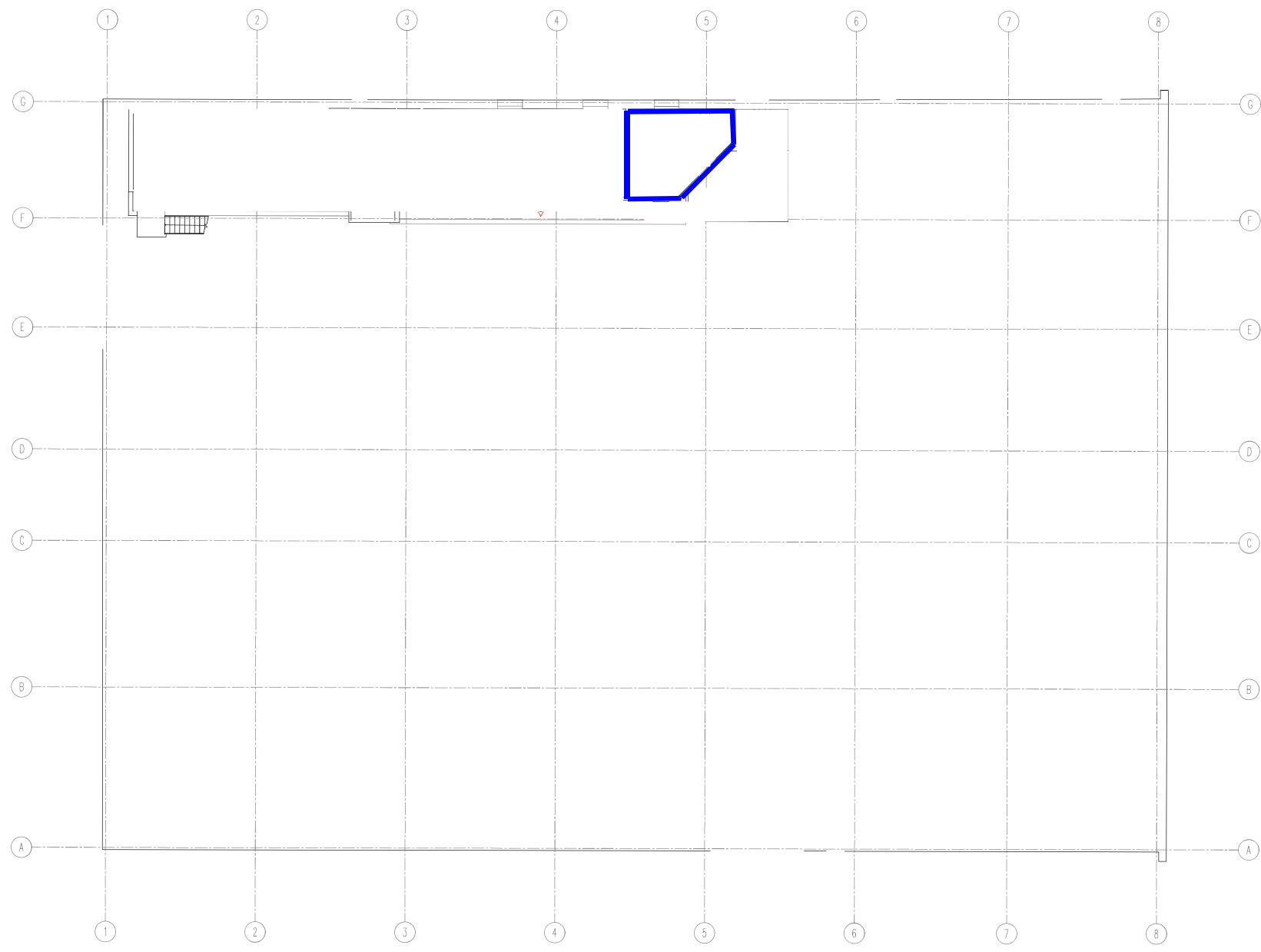
Blue Shed - First Floor

Plan 6

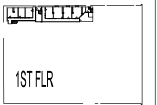
General Notes:

LEGEND

-  FIRE DOOR
-  STANDARD DOOR



B Room Numbers Added	01/17/16
A Door Numbers Added	01/03/16



London City Airport
Get closer.
London City Airport, City Aviation House
Royal Docks, London, E16 2PB

RECORD DRAWING

BLUE SHED			
Sheet 06			
First Floor			
General Arrangement			
04/08/15	VR		
R/BS/01		B	1:100





Jet Centre - Ground Floor

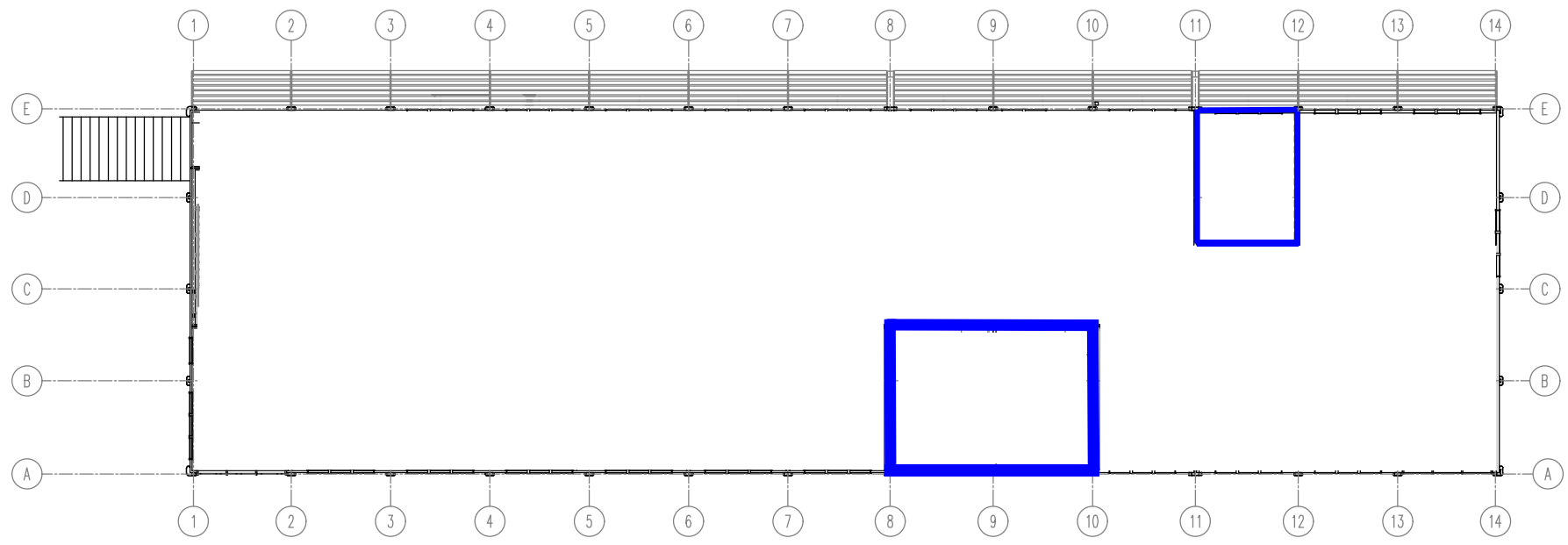
Plan 7

DO NOT SCALE - IF IN DOUBT ASK Associated Drawing

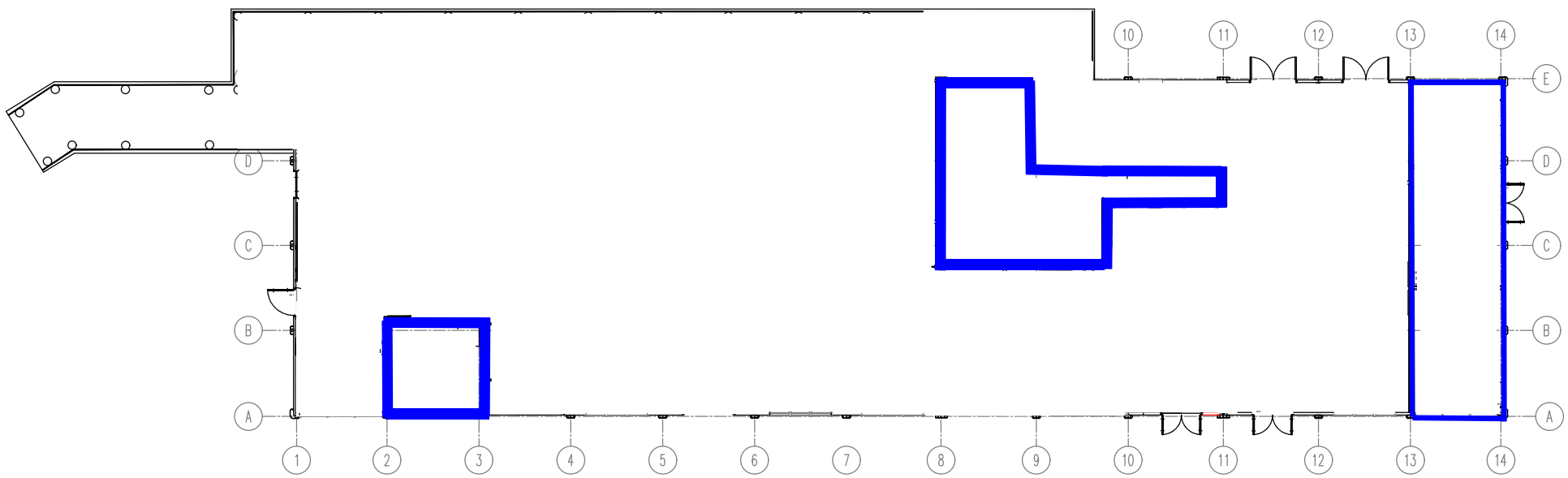
General Notes

LEGEND

-  Fire Door
-  Standard Door



Jet Centre - First Floor



E Item Numbers Added	16/06/18
D Layout amended	19/06/18
C 04/06/18	04/06/18
B Item Numbers Added	04/02/18
A Modified as indicated	15/06/15

G-1 FLRS

London City Airport
Get closer.
London City Airport, City Action House
Royal Dock, London, E16 1SB

RECORD DRAWING

JET CENTRE
Sheet 11
Ground to First Floor
General Arrangement Plan



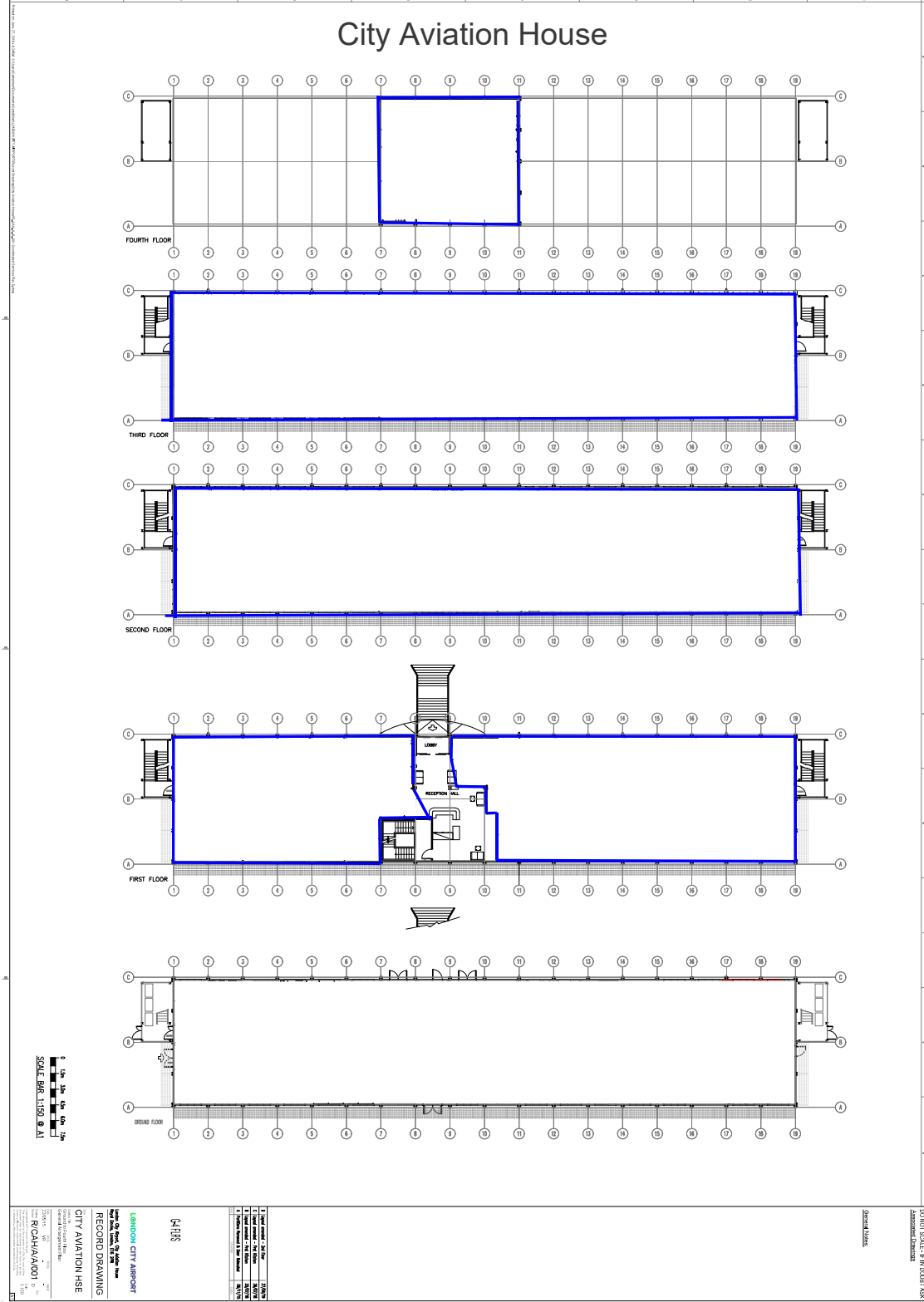
SCALE BAR 1:75 @ A1

24/07/15 VJR
R/JC/A/001

40

City Aviation House

Plan



BETWEEN:-

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

Claimants

- v -

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

Defendants

PARTICULARS OF CLAIM

I. INTRODUCTION

1. The First Claimant is the operator of London City Airport, located at Royal Docks, London, E16 2PB (the "**Airport**"). The Airport serves around 3.7 million travelling passengers each year with an annual revenue of approximately £85 million.
2. The Second Claimant is a company, the principal activity of which is to own and develop the key assets of the Airport.
3. The Defendants are Persons Unknown who are environmental activists and who have committed to engaging in a campaign of disruptive direct action at airports across the country in summer 2024.

II. LAND TO WHICH CLAIM RELATES

4. The land and property to which this Claim relates is London City Airport, located at Royal Docks, London, E16 2PB (the “**Airport**”).

5. The Airport is the subject of 13 relevant registered titles. In particular:

5.1 The First Claimant is the registered owner of the following five registered titles:

- (1) TGL469846 (freehold);
- (2) EGL527797 (leasehold);
- (3) EGL527799 (leasehold);
- (4) TGL617976 (leasehold); and,
- (5) EGL555153 (leasehold).

5.2 The Second Claimant is the registered owner of the following eight registered titles:

- (1) EGL519692 (freehold);
- (2) EGL552140 (freehold);
- (3) EGL518399 (freehold);
- (4) EGL530134 (freehold);
- (5) EGL338199 (leasehold);
- (6) EGL291578 (leasehold);
- (7) EGL465048 (leasehold); and,
- (8) EGL373364 (leasehold).

6. The extent of the Claimants’ land (a larger area of land than the land over which the injunction is sought) is shown on Plan A attached to the Claim Form (showing the various parcels of land owned or leased by the Claimants). The extent of the land sought to be covered by the injunction is set out on Plan 1 attached to the Claim Form.

7. For the avoidance of doubt, the Claimant's land does not include (and this claim does not purport to relate to) the following areas on Plan 1:
 - 7.1 In relation to the areas shaded purple in Plan 1, the viaduct suspended over the ground level and forming part of the Docklands Light Railway.
 - 7.2 In relation to the areas shaded pink, those areas located below ground level forming (i) a rail tunnel (ii) a subway and (iii) a tunnel forming part of the Docklands Light Railway.
8. By this claim, the Claimants seek injunctive relief over the Claimants' land but excluding the following parcels of land, which are the subject of leases to third parties:
 - 8.1 Those buildings shaded blue on Plan 1;
 - 8.2 In those buildings shaded green on Plan 1, the areas edged blue on Plans 2-9.
9. The land over which injunctive relief is sought is referred to as the "**Land**".

III. PREVIOUS DIRECT ACTION AT THE AIRPORT

10. In October 2019, Extinction Rebellion carried out direct action at the Airport as part of a series of protests on climate change. This included:
 - 10.1 A large group of individuals blocking the main entrance to the Airport.
 - 10.2 A large group of individuals occupying the DLR station adjoining the Airport.
 - 10.3 One individual climbing onto the top of an aircraft and gluing himself onto it.
 - 10.4 One individual boarding a flight and refusing to take his seat.
11. As a result of this direct action, around 50 individuals were arrested. The Airport suffered losses of approximately £279,000.

IV. THE AIRPORTS CAMPAIGN

12. On 9 March 2024, at a meeting in Birmingham in early March 2024, the environmental group Just Stop Oil discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the “**Airports Campaign**”).
13. At this meeting, a co-founder of Just Stop Oil was reported to have advocated:
 - 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.
14. Since this meeting, Just Stop Oil has announced the following on its website:

“SO WHAT’S THE PLAN?

*Our Government doesn't give a f*** about its responsibilities. The country is in ruins. You know it, I know, they know it. That means it's up to us to come together and be the change we need.*

We need bold, un-ignorable action that confronts the fossil fuel elites. We refuse to comply with a system which is killing millions around the world, and that's why we have declared airports a site of nonviolent civil resistance.”

We can't do this alone, we have a plan for this Summer, are you willing help make this happen?”

15. It says, further:

“This summer, Just Stop Oil will be taking action at airports.

As the grass becomes scorched, hosepipe bans kick in and the heat of the climate crisis enters peoples' minds, our resistance will put the spotlight on the heaviest users of fossil fuels and call everyone into action with us.

We'll work in teams of between 10-14 people willing to risk arrest from all over the UK. We need to be a minimum of 200 people to make this happen, but we'll be prepared to scale in size as our numbers increase. Exact dates and more details are coming.

Our plan can send shockwaves around the world and finish oil and gas. But we need each other to make it happen. Are you ready to join the team?"

16. Just Stop Oil has also organised a fundraising page on the website <https://chuffed.org/project/just-stop-oil-resisting-against-new-oil-and-gas>, which says the following:¹

"Cat's out the bag. Just Stop Oil will take action at airports

The secret is out – and our new actions are going to be big.

*We're going so big that we can't even tell you the full plan, but know this – Just Stop Oil will be taking our most radical action yet this summer. We'll be taking action at sites of key importance to the fossil fuel industry; **super-polluting airports.***

..."

17. On 6 June 2024, an email was sent from info@juststopoil.org to a subscriber list stating:

"This is the most exciting email I've ever sent.

As many of you already know, this summer Just Stop Oil is taking action at airports.

That's exciting right? Well, there's more.

We won't be taking action alone.

Resistance groups across several countries in Europe have agreed to work together. That means this summer's actions will be internationally coordinated.

PICTURE OF AIRPORT ACTIONS SYMBOLISING INTERNATIONAL COMMUNITY

(<https://us02web.zoom.us/meeting/register/tZloduqqTMtE9dgMMhlaymvEZgO45jgJ19A>)

People across Europe will be taking the fight to airports, the heart of the fossil economy.

This summer's actions across multiple countries will go down in history.

Want to meet the people making this happen?

Every Thursday for the next four weeks starting on the 13th of JUNE, 6.30pm

You don't want to miss this.

See you there,

¹ As of 7 June 2024, £23,835 had been raised on this website.

Just Stop Oil

18. On 2 June 2024, Extinction Rebellion environmental activists blocked access to Farnborough Airport.

V. CAUSES OF ACTION

19. The Claimants apprehend that, unless restrained by the Court, Persons Unknown will carry out acts amounting to trespass and nuisance on the Land.
20. In relation to trespass, members of the public have an implied consent to enter the Airport for air-travel and directly related purposes (such as dropping-off and picking-up passengers). They do not have the Claimants' consent to enter, remain on or occupy the Land for the purposes of carrying out a protest or taking part in any demonstration, procession or public assembly.
21. On 10 June 2024, notices were posted at various prominent locations around the Airport stating the following:

“Members of the public do not have consent to enter or remain at London City Airport for the purpose of carrying out a protest or taking part in any demonstration, procession or public assembly. For the avoidance of any doubt, any individual entering London City Airport for the purposes of carrying out a protest or taking part in any demonstration, procession or public assembly has no licence to do so and is a trespasser. Moreover, pursuant to Byelaw 3(12) of the London City Airport Byelaws 1988, breach of which is a criminal offence, all persons intending to enter London City Airport in order to undertake a protest or to take part in any demonstration, procession or public assembly are prohibited from doing so.”

22. This notice was also published on the First Claimant's website on the same day.
23. Further, the London City Airport Byelaws prohibit the following acts (breach of which amounts to a criminal offence):

23.1. Byelaw 3(11): *“No person shall remain on the airport, or any part thereof, after having been requested by LCA or a constable to leave.”*

23.2. Byelaw 3(12): *“No person shall enter the airport except as a bona fide airline passenger, whilst having been prohibited from entering by LCA or a constable.”*

23.3. Byelaw 3(13): *“No person shall in the airport:*

(a) intentionally obstruct any officer of LCA in the proper execution of his duties;

(b) intentionally obstruct any person carrying out an act which is necessary to the proper execution of any contract with LCA; or

(c) intentionally obstruct any other person in the proper use of the airport, or behave so as to give reasonable grounds for annoyance to other persons in the airport.”

23.4. Byelaw 5(7): *“No person shall climb any wall, fence, barrier, railing or post.”*

23.5. Byelaw 5(11): *“No person shall remove, displace or alter any structure or other property (including any notice) forming part of or provided for or in connection with the airport or erect or place on any part of the airport any such structure or property.”*

23.6. Byelaw 7(3): *“No person shall enter or climb upon, or attempt to enter or climb upon, any part of any aircraft without the authority of the person in charge of it or otherwise without lawful authority or reasonable cause or excuse.”*

24. Consequently, Persons Unknown taking part in the Airports Campaign (or related campaign) do not have the Claimants’ consent to enter, remain or occupy the Land for the purpose of protest or taking part in any demonstration, procession or public assembly. As such, they would be committing a trespass were they to do so.

25. In relation to nuisance, the threatened acts referred to at paragraphs 12-17 above would amount to an undue and substantial interference with the Claimants’ enjoyment of the Land.

VI. RELIEF SOUGHT

26. As a result of the above, the Claimants seek injunctive relief to prevent the apprehended trespasses and nuisance.
27. In addition, the Claimants seek damages for any losses suffered as a result of the unlawful conduct.

VII. IDENTITIES OF THE DEFENDANTS

28. The Claimants are not aware of the identities of any individuals who are likely to carry out direct action on the Land. This is because such direct action has not yet occurred. Even once it occurs, the Claimants would likely be unable to identify the participating individuals unless their details were provided by the police following arrest.

VIII. SERVICE/NOTIFICATION

29. Pursuant to *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claimants are not able to serve Persons Unknown. Rather, the Claimants propose to notify Persons Unknown of the Claim Form, the Application Notice and evidence in support by taking the following steps:

29.1 Uploading a copy onto the following website:

<https://www.londoncityairport.com/corporate/injunction>.

29.2 Sending an email to juststopoil@protonmail.com, juststopoilpress@protonmail.com and info@juststopoil.org stating that a claim has been brought and the application for an interim injunction made, and that the documents can be found at the website referred to above.

29.3 Affixing a notice at those locations marked with an "x" on Plan 1 stating that the claim has been brought and the application for an interim

injunction made, and setting out where these documents can be found and obtained in hard copy.

IX. HUMAN RIGHTS

30. Any reliance by the Defendants or Persons Unknown on their rights to freedom of expression and/or assembly within Articles 10/11 ECHR provides no defence to this claim. Articles 10 and 11 ECHR include no right to trespass on private property and thereby override the rights of private landowners: *DPP v Cuciurean* [2022] 3 WLR 446 (DC), §§40-50; *Ineos Upstream v Persons Unknown* [2019] 4 WLR 100 (CA), §36 (Longmore LJ).

AND THE CLAIMANTS CLAIM

- (1) An order that until 7 June 2027 the Defendants and Persons Unknown must not, without the consent of the Claimants, enter, occupy or remain upon the Land;
- (2) Costs; and,
- (3) Further and/or other relief.

YAASER VANDERMAN

Landmark Chambers

STATEMENT OF TRUTH

The Claimants believe that the facts stated in these 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.



Stuart Sherbrooke Wortley

Partner

Eversheds Sutherland (International) LLP

Claimants' solicitor

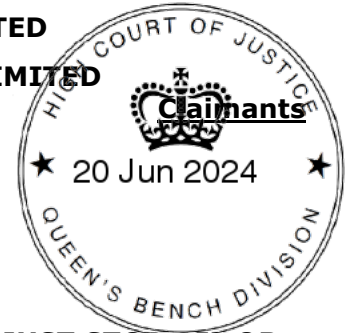
IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION

CLAIM NO: KB-2024-001765

Before Mr Justice Julian Knowles
On 20 June 2024

BETWEEN:-

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



- v -

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

Defendant

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimants' claim by Claim Form, dated 12 June 2024

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

AND UPON hearing Counsel for the Claimants

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

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

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

IT IS ORDERED THAT:

INJUNCTION

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

VARIATION

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

SERVICE AND NOTIFICATION

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

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

FURTHER DIRECTIONS

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

COMMUNICATIONS WITH THE CLAIMANT

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

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

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

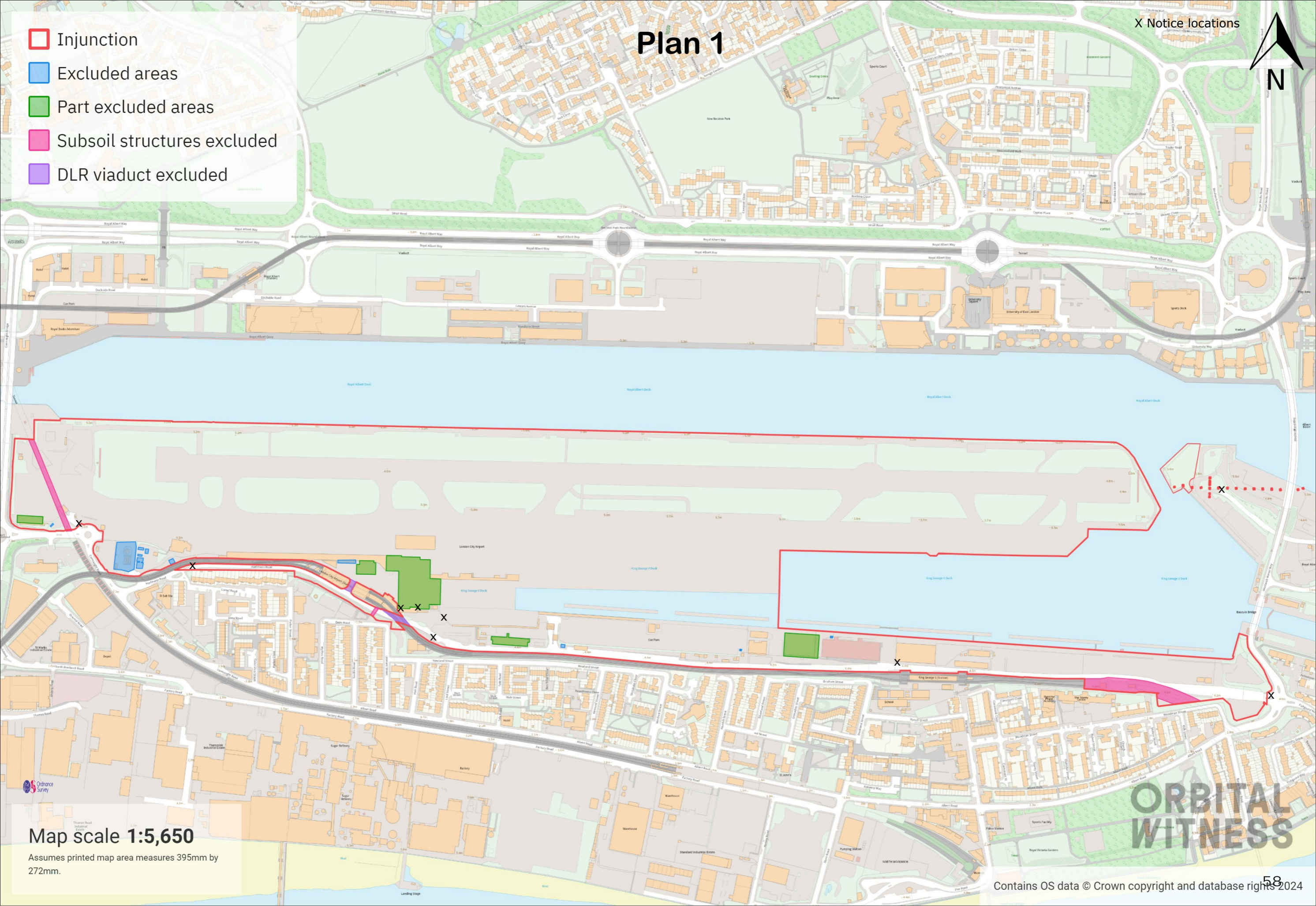
Dated: 20 June 2024

SCHEDULE 1 - PLANS

- Injunction
- Excluded areas
- Part excluded areas
- Subsoil structures excluded
- DLR viaduct excluded

Plan 1

X Notice locations



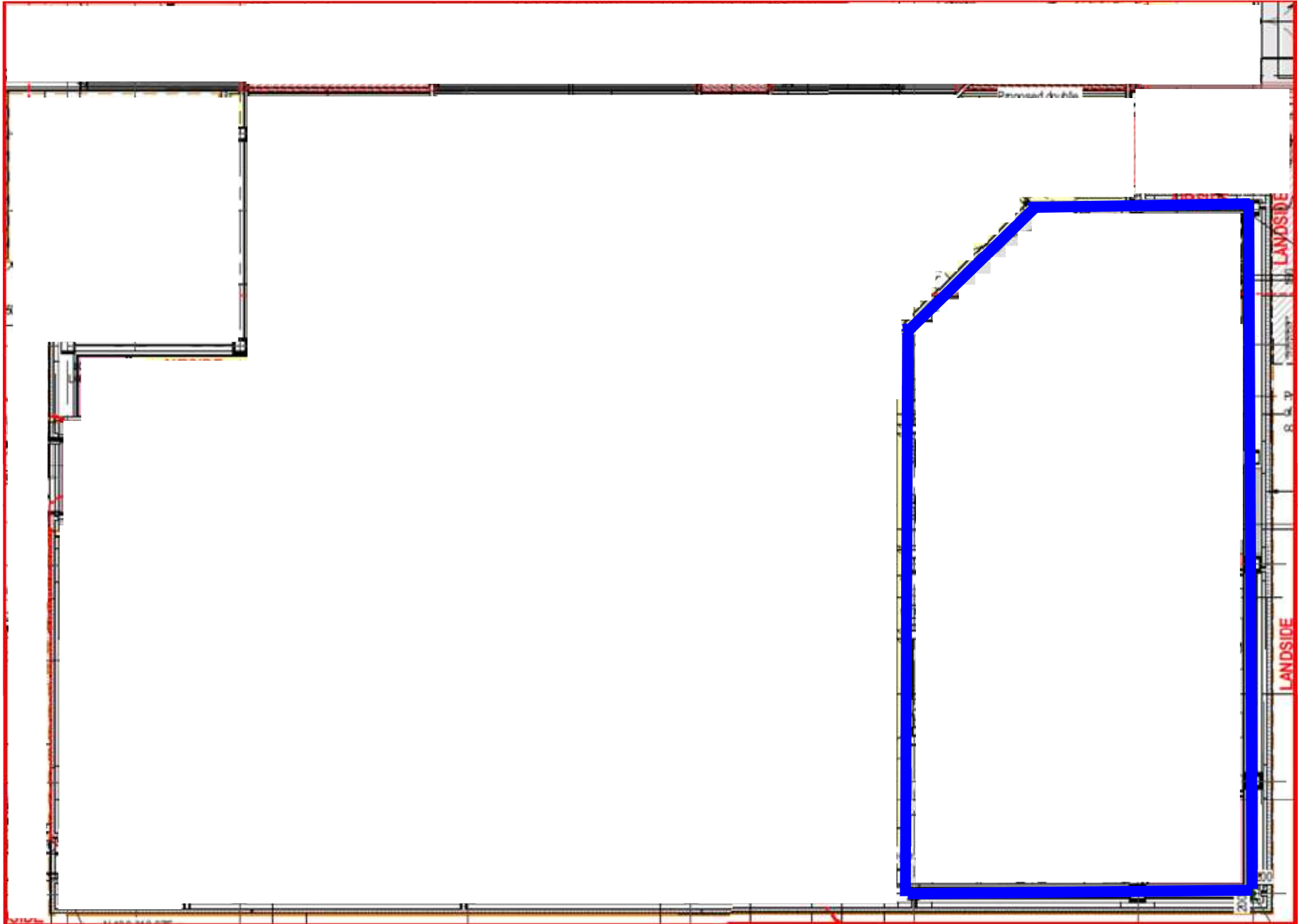
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**ORBITAL
WITNESS**



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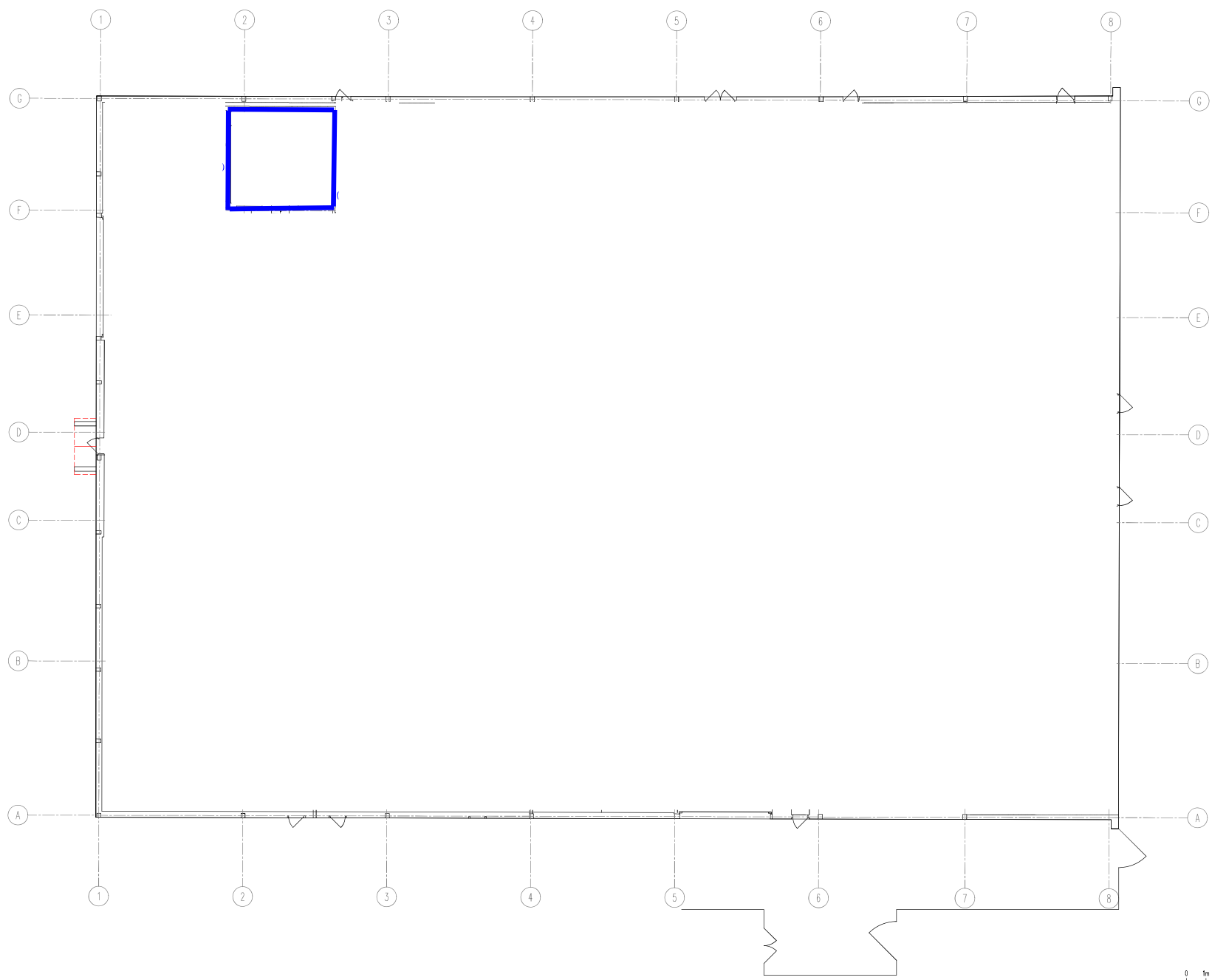
Plan 3



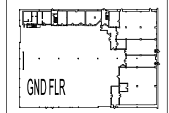
d r d r

Plan 5

General Notes:



B Room Numbers Added	01/11/16
A Door Numbers Added	01/03/16



London City Airport, City Aviation House
Royal Docks, London, E16 2PB
RECORD DRAWING

BLUE SHED
 Sheet 08
 Ground Floor
 General Arrangement Plan
 04/08/15 VR
 R/BS/02/001
 1:100

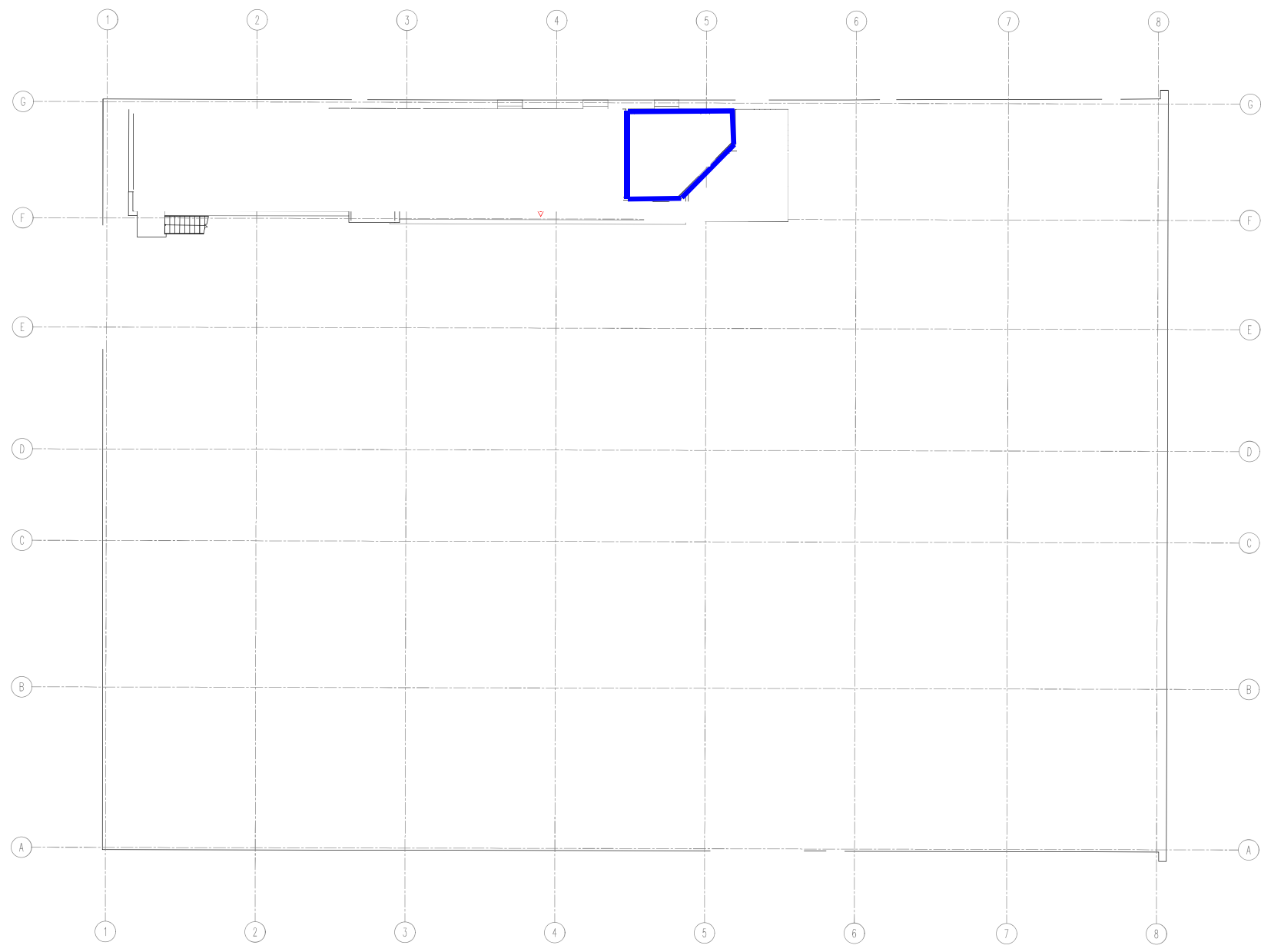


Blue Shed - 1st Floor

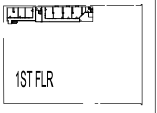
Plan 6

General Notes:

LEGEND
[Symbol] FIRE DOOR
[Symbol] STANDARD DOOR



B	Room Numbers Added	01/11/16
A	Door Numbers Added	01/03/16



London City Airport
Get closer.
London City Airport, City Aviation House
Royal Docks, London, E16 2PB

RECORD DRAWING


BLUE SHED
Sheet 06
First Floor
General Arrangement
04/08/15 VR
R/BS/AS/01
1:100



Plan 7

General Notes

LEGEND

-  Fire Door
-  Standard Door

E Item Numbers Added	16/06/18
D Layout amended	19/06/18
C 04/06/18	04/06/18
B Item Numbers Added	04/02/18
A Modified as Indicated	15/06/15

G-1 FLRS

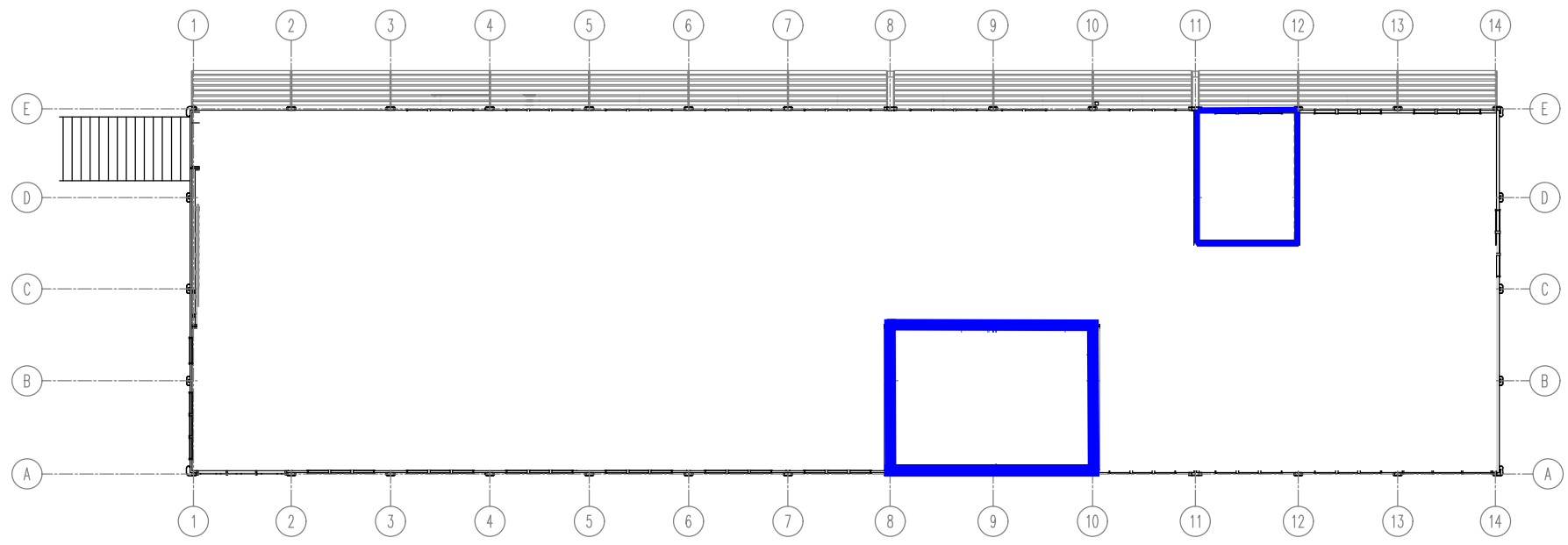
London City Airport
Get closer.
London City Airport, City Action House
Royal Dock, London, E16 1JH

RECORD DRAWING

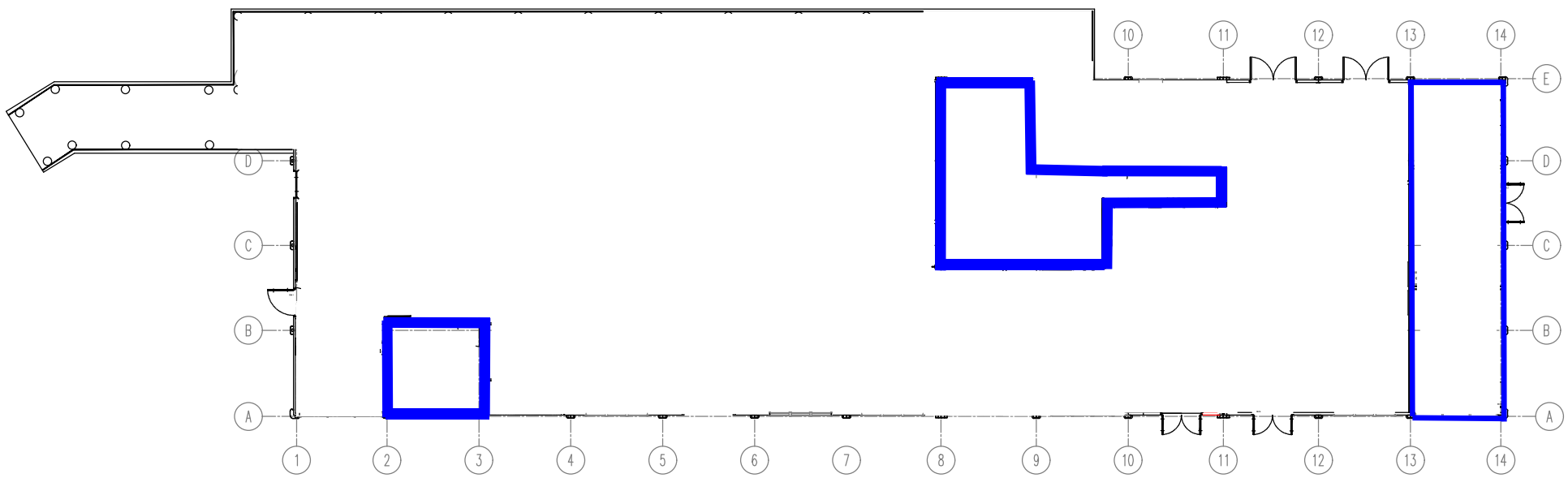
JET CENTRE
Grid 11
Ground to First Floor
General Arrangement Plan

24/07/15	VR	2011	2017
R/JC/A/001	01	02	03
04	05	06	07
08	09	10	11
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r r d r



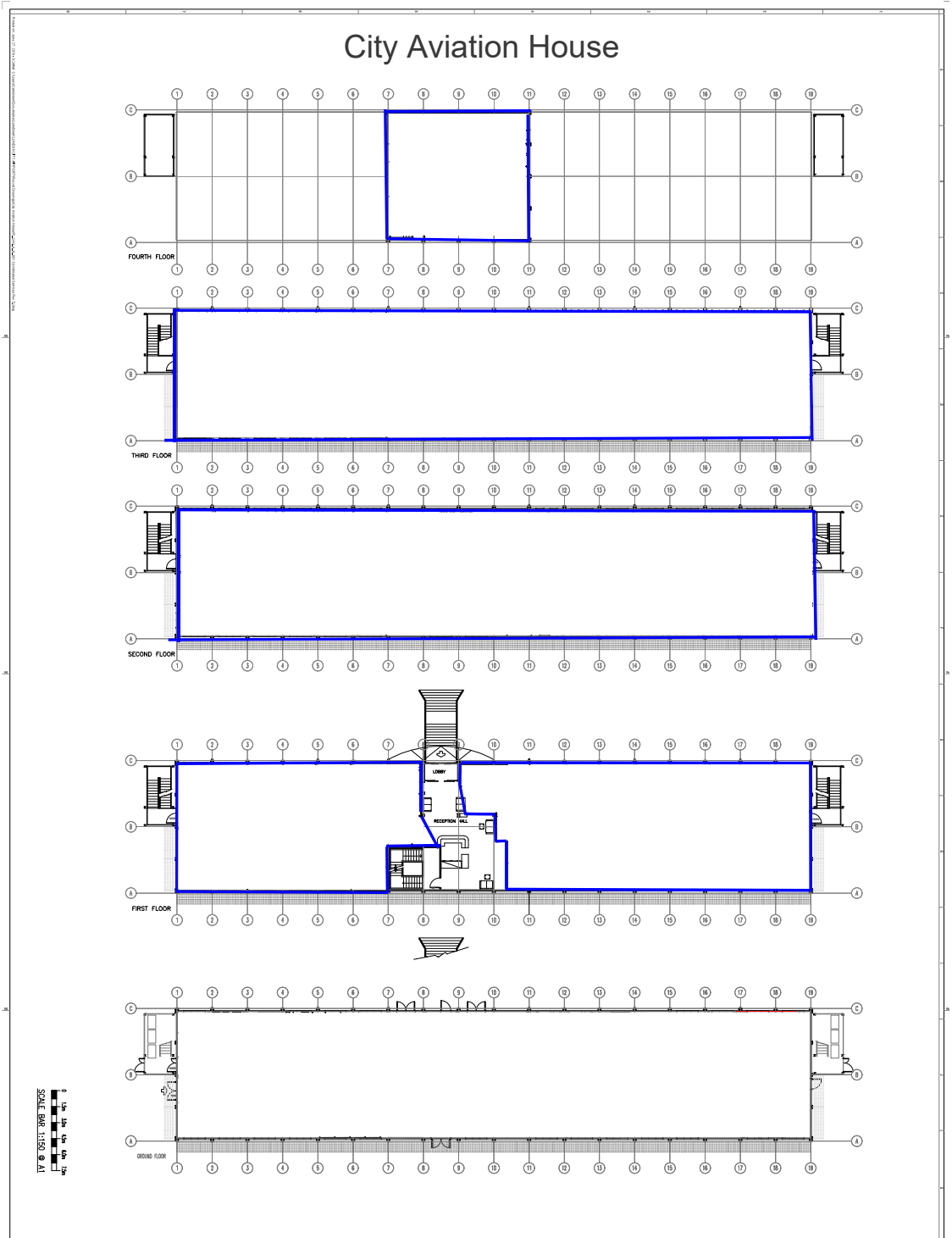
Jet Centre - r Floor



SCALE BAR 1:75 @ A1

City Aviation House

Plan



0 1/4" = 1'-0"
 SCALE: ARCH. 1/8" = 1'-0"
 BY: A1

<p>PROJECT: CITY AVIATION HOUSE ARCHITECT: RICHARD A. ADRIANO ARCHITECTS DATE: 10/2015</p>	<p>DATE: 10/2015 DRAWING NO.: 1015-01 SHEET NO.: 1015-01-01</p>	<p>PROJECT: CITY AVIATION HOUSE ARCHITECT: RICHARD A. ADRIANO ARCHITECTS DATE: 10/2015</p>
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SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS

- (1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.

- (2) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LONDON CITY AIRPORT LIMITED

(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

and

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

Defendant

NOTE OF "WITHOUT NOTICE" HEARING BEFORE

MR JUSTICE JULIAN KNOWLES

20 June 2024

The hearing commenced at 10:30.

Mr Justice Julian Knowles was familiar with the jurisdiction having granted the HS2 "route wide" injunction [2022] EWHC 2360 (KB) and the ESSO Southampton London Pipeline injunction [2023] EWHC 2013 (KB).

The Judge had read the hearing bundle and the Claimant's skeleton argument and he had received the authorities bundle.

YV introduced the papers and handed up reports of incidents at Stonehenge on 19.06.24 and at Stanstead Airport on 20.06.24.

The Judge acknowledged this material as evidencing that protests were starting to happen.

YV proposed a "route map" which followed his skeleton argument.

1. The airports campaign + the risk of harm
2. The Claimant's decision to apply "without notice"
3. The site
4. The draft Order
5. The relevant legal tests and
6. The Claimant's submissions
7. The Claimant's obligation to give full and frank disclosure

1. The airports campaign + the risk of harm

YV referred to paras 4 – 12 of his skeleton argument.

YV noted that the October 2019 incident had been organised by Extinction Rebellion (not Just Stop Oil).

YV referred to:-

- the following paragraphs of Alison FitzGerald's w/s
 - 6-10 – the airport business;
 - 19-26 – the October 2019 incident at London City Airport;
 - 27-32 – health and safety issues;
 - 35 – the Met police;
- the photograph of James Brown having glued himself to the top of an aircraft at London City Airport in October 2019 at "AMF3" (HB/90); and
- the Daily Mail article dated 9 March 2024 (which broke news of the JSO's 2024 airports campaign) at "SSW5" (HB/257-263).

The Judge noted the unusual location of London City Airport being close to a city centre.

2. Without Notice

YV referred to paras 13-16 of his skeleton argument.

Whilst the Judge acknowledged that CPR 25.3 and s.12 HRA 1998 may not technically apply, he suggested that those tests be addressed on a belts and braces approach.

YV submitted that there were good or compelling reasons for the application being made without notice (notwithstanding his submission that this test does not extend to claims against classes of Persons Unknown). The good and compelling reasons were that if JSO were notified of the application for an injunction before the hearing they may well decide to take direct action before the injunction took effect (which would only happen once all the steps of notification had been completed): (1) this would lead to a risk of severe harm; (2) JSO may defeat the very purpose of the injunction. Although it could be argued that this was not a case involving, e.g., blackmail or freezing orders, there could be irreversible harm if a serious accident occurred or other disruption to passengers; and, (3) in circumstances where they had no right whatsoever to do so. YV referred to *Birmingham CC v Afsar* [2019] EWHC 1560 where Warby J referred to the fact that this might not be a relevant consideration. But YV tried to distinguish that case on the basis that Article 10/11 ECHR would not protect JSO in this case as it was on private land.

The Judge noted that all of the land in respect of which the Claimants seek an injunction is private land and commented that the position had not been so straightforward in the HS2 route wide injunction.

YV referred to p.719 of the White Book, para 25.3.3 and the reference to the Privy Council judgment in *National Commercial Bank Jamaica v Olint Corp.* That judgment purported to set out 2 bases for going without notice: where there is no time to notify and where notifying would defeat the purpose of the injunction. YV argued that this case was in the specific context of banking and could not and was not purporting to speak to the gamut of cases, including the present one relating to trespass on private land.

3. The Site

YV explained Plan A, Plan 1 and Plans 2-8.

YV explained that the internal layout of buildings had been redacted for reasons of national security.

YV confirmed that the Judge was correct in surmising that some of the areas edged blue in the main terminal building were retail areas.

YV explained the points at which Hartmann Road ceases to be an adopted highway and the point where Hartmann Road passes through a subway below the DLR.

In relation to the location of warning notices, the Judge noted that although the airport could be accessed from the docks, the Claimants were not proposing to post warning notices in those locations. YV argued that anyone seeking to access the airport from the docks would clearly be part of the campaign of direct action and would likely know about the injunction once JSO were notified. They would also only be subject to the injunction if they fell within the definition of Persons Unknown. Instructions were taken from the Claimants Head of Legal who referred to the fact that the water level changes as the docks are tidal and that airport regulations would need to be considered before any notices could be affixed to stakes so close to the runway. The Judge was satisfied that the Claimants had considered the most appropriate places to affix the warning notices.

4. The Draft Order

YV explained that the Claimants were seeking a 5 year injunction subject to annual review.

Strictly speaking, it was neither an interim nor a final injunction.

YV referred the Judge to the fact that 5 years plus an annual review appeared to have become the standard duration for injunctions which protect oil and gas refineries and terminals and he referred to the cases listed at paragraph 7.13 of YV's text book.

The following amendments were made:-

- in recital a – the reference to "Plans 2-9" was changed to "Plans 2-8"
- in para 1 - the date was changed from 12 June 2027 to 20 June 2029
- in para 7 c – the wording was changed to allow the Claimants to include notification of the proceedings on the injunction warning notice

5. Legal Tests

YV referred the Judge to para 58 of Ritchie J's decision in *Valero v PUs* dated 26 January 2024 [2024] EWHC 134 (KB) in which Ritchie J set out his distillation of the 15 substantive requirements which the Claimant needed to satisfy. On the test to be satisfied for requirement number 3, YV accepted the test was higher than the serious issue to be tried threshold in *American Cyanamid*. He said whichever test you apply – "likely" to succeed at trial or the summary judgment test as in *Valero* – Cs satisfied it.

The Judge noted that there is no right to protest on private land “full stop”.

YV referred the Judge to the following paragraphs in Ritchie J’s decision in HS2 dated 24 May 2024 [2024] EWHC 1277 (KB) – 4, 5, 13, 15, 17 and 58-59.

The Judge noted that in substance if not in form, the Claimants were seeking a final injunction.

YV referred to an error in para 58(13) of Ritchie J’s judgment in Valero (the Judge referred to alternative service on Persons Unknown (which is inconsistent with *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 42 (SC) – see footnote 7 on p 11 of YV’s skeleton argument).

6. The Claimants’ submissions

YV addressed each of the 15 substantive requirements set out in Ritchie J’s decision by reference to para 24 of his skeleton argument.

7. Full and Frank Disclosure

YV said that it might be said against the Claimants that:-

- the Claimants should proceed after giving notice (YV had already addressed this);
- there was no evidence of a direct threat against London City Airport (again YV had addressed this);
- the Public Order Act 2023 includes offences which are related to protest (the Judge said that the criminal law has a different purpose and that criminal proceedings can take a long time. YV agreed and also referred to the facts that: (1) landowners are entitled to vindicate their private rights; (2) enforcement would be up to Cs; (3) of the protestors who had been arrested and charged with criminal offences following the October 2019 incident at London City Airport, only James Brown had been convicted; and, (4) the police themselves had recommended LCY consider obtaining an injunction.

The Judge said that he would grant the Order as sought, subject to the minor amendments discussed, but that rather than giving an *ex tempore* judgment, he would provide written reasons in due course.

The hearing concluded at 11:45 am



Neutral Citation Number: [2024] EWHC 2557 (KB)

Case No: KB-2024-001765

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Royal Courts of Justice
Strand, London, WC2A 2LL

Date: 11/10/2024

Before :

MR JUSTICE JULIAN KNOWLES

Between:

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

Claimants

and

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

Defendants

Yaaser Vanderman (instructed by Eversheds Sutherland (International) LLP) for the Claimants

The Defendants did not appear and were not represented

Hearing dates: **20 June 2024**

Approved Judgment

This judgment was handed down remotely at 10:30 on 11 October 2024 by circulation to the parties or their representatives by e-mail and by release to the National Archives.

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Mr Justice Julian Knowles:

Introduction

1. On 20 June 2024 in the Interim Applications Court I granted the Claimants' without notice application for a precautionary injunction to restrain anticipated protests at London City Airport (the Airport) by environmental campaigners and others falling within the description of the Defendants on the order. The planned action would amount to nuisance and trespass. Having read the evidence in advance of the hearing and after hearing Mr Vanderman on behalf of the Claimants, I was satisfied they were entitled to the order they were seeking. These are my reasons for granting the order.
2. The injunction is the sort of 'newcomer injunction' which have been granted by the courts in protest and other cases in recent years. The evolution of this sort of injunction, and the relevant legal principles, were set out by the Supreme Court in *Wolverhampton City Council and others v London Gypsies and Travellers and others* [2024] 2 WLR 45. I will refer to this as *Wolverhampton Travellers* case.
3. Recent examples of such injunctions are: *Jockey Club Racecourses Ltd v Persons Unknown* [2024] EWHC 1786 (Ch); *Exolum Pipeline System Ltd and others v Persons Unknown* [2024] EWHC 1015 (KB); *Valero Energy Ltd v Persons Unknown* [2024] EWHC 134 (KB); *Multiplex Construction Europe Ltd v Persons Unknown* [2024] EWHC 239 (KB); *High Speed 2 (HS2) Limited v Persons Unknown* [2024] EWHC 1277 (KB); and *Wolverhampton City Council v Persons Unknown* [2024] EWHC 2273 (KB). The legal basis for newcomer injunctions, and the principles which guide whether they should be granted in a particular case, are therefore now firmly established.

Without notice

4. The application before me was made without notice. I was satisfied this was appropriate for the following reasons.
5. Ordinarily, the Claimants would be required to demonstrate that there were 'good' (as required by CPR r 25.3(1)) or 'compelling' (Human Rights Act 1998, s 12(2)(b) (if it applies here, which the Claimants say it does not, a point I will return to) reasons for bringing an application without notice. Those requirements do not technically apply here as they only affect applications brought against parties to proceedings. In the present case, which relates only to Persons Unknown who are newcomers, there is no defendant: *Wolverhampton Travellers*, [140]-[143]. Nonetheless, I proceeded on the basis that the relevant tests had to be satisfied.
6. I was and am satisfied that there are good and compelling reasons for the application to have been made without notice.
7. In particular, the Claimants were justifiably concerned about the severe harm that could result if Persons Unknown were to be notified about this application. As I shall describe, there have been repeated serious threats about the scale and

sort of direct action planned, and this will pose a serious risk of physical harm, financially injurious disruption and huge public inconvenience. The damage caused would for the most part be irreparable. There was plainly a risk that would-be protesters would trespass upon the Airport before the application was heard and carry out the threatened direct action, thus partially defeating the purpose of the injunction.

8. I carefully considered the Convention rights of the Defendants. However, the Airport is private land, and for the reasons I explained in *High Speed Two (HS2) Limited v Persons Unknown* [2022] EWHC 2360 (KB), [131], these Convention rights are not therefore engaged. Persons unknown have no right to enter the Airport (save for lawful and permitted purposes) or to protest there. The position is therefore different from injunctions or laws restricting assembly and protest on the highway or public land, where the Convention is engaged: cf. *Re Abortion Services (Safe Access Zones) (Northern Ireland) Bill* [2023] AC 505; *Birmingham City Council v Afsar* [2019] EWHC 1560 (KB).

Background

9. The application was brought by the Claimants on the basis of their belief that the Defendants are or were organising and had widely publicised a nationwide campaign of direct action to disrupt airports during the summer of 2024 (the Airports Campaign). The Claimants' application for injunctive relief was to restrain such threatened acts of trespass and nuisance at London City Airport. The whole of the site covered by the injunction is private land. (I should also add that a few weeks after I heard the Claimants' application, I heard an application for, and granted, a similar injunction in respect of Heathrow Airport on much the same basis).
10. The evidence is principally contained in the witness statements of Alison FitzGerald, the CEO of London City Airport and a director of each of the First and Second Claimants, and Stuart Wortley, of the Claimants' solicitors, and their exhibits.
11. Just Stop Oil is one of a number of groups which in recent years have become prominent for staging public protests. Each of these organisations shares a common objective of reducing the rate of climate change and each of them has used acts of civil disobedience to draw attention to the climate crisis and the particular objectives of their organisation.
12. Just Stop Oil's website refers to itself as:

“a non-violent civil resistance group demanding the UK Government stop licensing all new oil, gas and coal projects.”
13. In his witness statement at [32]-[41], under the heading 'Just Stop Oil – 2024 Threat to Disrupt Airports' Mr Wortley describes how in spring 2024 Just Stop Oil announced a nationwide summer campaign targeting airports in order to 'put the spotlight on the heaviest users of fossil fuels and call everyone into action with us'. At [32] he said this:

“32. The on-line edition of The Daily Mail for 9 March 2024 included a story about an undercover journalist who had successfully infiltrated a JSO meeting in Birmingham earlier that week. Apparently the meeting had been attended by over 100 activists. The following text is an extract from that story:-

“At the meeting, which was attended by an undercover reporter, JSO co-founder Indigo Rumbelow was greeted by cheers as she told the audience:

'We are going to continue to resist. We're going to ratchet it up.

We're going to take our non-violent, peaceful demonstrations to the centre of the carbon economy. We're going to be gathering at airports across the UK.'

Ms Rumbelow, the 29-year-old daughter of a property developer, has previously been arrested for conspiracy to cause public nuisance during the King's Coronation and made headlines last year when Sky News host Mark Austin had to beg her to 'please stop shouting' during an interview.

Outlining a blueprint for causing travel chaos, she advocated:

- 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.

Miss Rumbelow told the crowd:

'We're going to be saying to the Government: 'If you're not going to stop the oil, we're going to be doing it for you.'

She cited similar protests to use as inspiration for their action, including Hong Kong students 'gathering in sit-ins in the entrances to airports, closing and disrupting them, day after day' during their protests against Chinese rule in 2019.”

14. At [35] he referred to an article in the *Evening Standard*:

“35. The Evening Standard article referred to another meeting (also attended by an undercover journalist) and which included the following text:-

“... Just Stop Oil’s Phoebe Plummer reportedly warned of ‘disruption on a scale that has never been seen before’ at a meeting attended by an undercover journalist. The group has been critical of the airline industry over its carbon footprint.

She said: ‘The most exciting part of this plan is that [it’s] going to be part of an international effort. Flights operate on such a tight schedule to control air traffic that with action being caused in cities all around the world we’re talking about radical, unignorable disruption.’

She added: ‘It’s time to wake up and get real – no summer holiday is more important than food security, housing and the lives of your loved ones. Flying is also a symbol of the gross wealth inequality that’s plaguing our society and if we want to create change we need to adopt a more radical demand.’

Just Stop Oil is planning an alliance with Europe-based A22 Network to cause disruption at major international airports.”

15. Other evidence cited by Mr Wortley is published material from Just Stop Oil stating that:

- a. “We need bold, un-ignorable action that confronts the fossil fuel elites. We refuse to comply with a system which is killing millions around the world, and that’s why we have declared airports a site of nonviolent civil resistance.”
- b. “We’ll work in teams of between 10-14 people willing to risk arrest from all over the UK. We need to be a minimum of 200 people to make this happen, but we’ll be prepared to scale in size as our numbers increase.”
- c. “Our plan can send shockwaves around the world and finish oil and gas. But we need each other to make it happen. Are you ready to join the team?”

- d. “We’re going so big that we can’t even tell you the full plan, but know this — Just Stop Oil will be taking our most radical action yet this summer. We’ll be taking action at sites of key importance to the fossil fuel industry; super-polluting airports.”
- e. “This summer’s actions across multiple countries will go down in history.”

16. At [41] he quotes an email sent by Just Stop Oil to supporters:

“On 6 June 2024, JSO sent an email to subscribers in the following terms:-

“This is the most exciting email I’ve ever sent. As many of you already know, this summer Just Stop Oil is taking action at airports.

That’s exciting right? Well, there’s more.

We won’t be taking action alone.

Resistance groups across several countries in Europe have agreed to work together. That means this summer’s actions will be internationally Coordinated.”

17. I was shown, and also read, evidence about earlier disruptive protests at London City Airport. In 2019 Extinction Rebellion carried out similar direct action at the airport, namely:

- a. A large group of individuals blocked the main entrance to the Airport.
- b. A large group of individuals occupied the DLR station adjoining the Airport.
- c. One individual climbed onto the top of an aircraft and glued himself onto it.
- d. One individual boarded a flight and refused to take his seat.

18. In her witness statement at [28] Ms Fitzgerald explains that there are:

“28. ... a number of unusual features of London City Airport which make it an obvious target for protestors including environmental protestors. These include the following:-

28.1. the airport is close to the centre of London (and therefore easily accessible);

28.2. the runway is immediately adjacent to (and accessible directly from) Royal Albert Dock and King George V Dock;

28.3. the distance between the Main Terminal Building and the runway is short; and

28.4. there are no physical barriers between the Main Terminal Building and the aircraft stands (such as air-bridges which most airports use and which provide an useful means of preventing trespass by protestors).

29. Given that we do not have air bridges, all passenger movements between the terminal building and the aircraft stands (which involve crossing the access road which is used by multiple vehicles which service the airport) are carefully supervised by our ground-staff.”

19. Also in relation to Extinction Rebellion, on 2 June 2024, environmental activists blocked access to Farnborough Airport. It was reported that more than 100 individuals took part and several were arrested.
20. As Mr Wortley describes at [25]-[31], this actual and intimated campaign of nationwide direct action has echoes of the direct action taken against the energy sector in spring 2022, which resulted in substantial disruption and hundreds of arrests.
21. In short, I was and am satisfied on the evidence that there is and was evidence of a genuine threat to the Airport’s operations by environmental protesters.
22. I turn to the nature of that threat.

Risk of harm

23. In this case the risk of harm is not just to the Airport and passengers by virtue of the planned disruption. There is also a direct risk of harm to the protesters and others.
24. The risks of harm posed by the Airports Campaign are significant and are set out by Ms FitzGerald in her statement at [27]-[32] and [36]. In particular, there are the health and safety risks of untrained and unsupervised trespassers carrying out direct action on a taxiway and runway. These risks affect not just the trespassers themselves, but also airport and airline staff as well as the emergency services.
25. The risks include serious injury and even death arising from:
 - a. Coming too close to a jet engine (a person coming too close to an operating engine can be sucked in and killed).
 - b. People being struck by landing, departing or other aircraft as well as those aircraft having to take evasive action in order to avoid injuring trespassers.
 - c. Being struck by other vehicles travelling between the terminal building and aircraft stands as well as those vehicles having to take evasive action to avoid injuring trespassers.

- d. Falling from a height if trespassers climb on top of aircraft or onto the roofs of buildings and have to be removed.

The Site

26. Plan A in the bundle shows the land owned/leased by the Claimants. The Claimants between them hold the freehold or leasehold title to the land shown on the Plan. There is a tenancy at will on one parcel of land.
27. Plan 1 and Plans 2-8 in the bundle shows the extent of the land sought to be covered by the injunction, and the areas excluded. As I have said, all of the affected land is private land.

Legal principles

28. I recently reviewed some of the relevant case law in this area in my judgment in *Wolverhampton City Council v Persons Unknown* [2024] EWHC 2273 (KB), to which the reader is referred.

Precautionary relief

29. The test for precautionary relief of the type sought by the Claimants is whether there is an imminent and real risk of harm: *Ineos Upstream Ltd v Persons Unknown* [2019] 4 WLR 100, [34(1)] (Court of Appeal) and the first instance decision of Morgan J: [2017] EWHC 2945 (Ch), [88]. See also *High Speed Two (HS2) Limited*, [99]-[101]. 'Imminent' in this context simply means 'not premature': *Hooper v Rogers* [1975] Ch 43, 49. I was satisfied that this application were not premature and that, for the reasons I have gave earlier, there is more than a real risk of harm.

'Newcomer' or 'Persons Unknown' injunctions

30. As I explained earlier, the law in relation to this type of injunction was set out by the Supreme Court in *Wolverhampton Travellers*. In *Valero*, [58], and *Multiplex*, [11], Ritchie J set out a list of factors to be satisfied in the protest context (albeit in the former case the context of a summary judgment application).
31. As Mr Vanderman pointed out in his Skeleton Argument, [22], the present application is for injunctive relief against pure trespassers on private land. It is, therefore, unlike, for example, *Wolverhampton Travellers*, which involved injunctive relief sought by local authorities against Travellers (in respect of whom they have statutory duties) on local authority land; *Valero*, which involved injunctive relief against protesters, on both private and public land, and which therefore materially engaged Article 10 and 11 ECHR rights; and (I might add) the *Abortion Services* case, which concerned protests on public land.
32. Notwithstanding this, many of the *Valero* and *Multiplex* factors are still relevant to this application, which involves Persons Unknown who are newcomers, and I propose to analyse the Claimants' case by reference to them.

Discussion

33. I am satisfied that the *Valero* and *Multiplex* factors are satisfied here for the following reasons. I have italicised the factors.
34. *There must be a civil cause of action identified:* here, the causes of action are nuisance and trespass. In relation to trespass, Persons Unknown are threatening, by the Airports Campaign, to carry out the commission of intentional acts which result in the immediate and direct entry onto land in the possession of another without consent. All that needs to be shown is that the Claimants have a better right to possession than the Defendants: *High Speed 2 (HS2) Ltd*, [77]. That is plainly the case here. In addition, Persons Unknown have no licence to enter the Land for the purpose of carrying out protest or direct action.
35. To make this clear, the Claimants have published a notice on its website confirming this. In addition, such conduct is prohibited under Byelaw 3(12) of the London City Airport Byelaws 1988 (made under *inter alia* s 63 of the Airports Act 1986 and s 37 of the Criminal Justice Act 1982). This makes it a criminal offence ‘to enter or remain at London City Airport for the purpose of carrying out a protest or taking part in any demonstration, procession or public assembly’. The same notice has also been affixed at various locations around the Airport: see Ms FitzGerald, witness statement, [17].
36. In relation to nuisance, Persons Unknown are also threatening undue and substantial interference with the Claimants’ enjoyment of their land, amounting to a private nuisance.
37. *Sufficient evidence to prove the claim:* I am satisfied that there is sufficient evidence to prove the claims as set out above. There is more than a ‘serious issue to be tried’. It is overwhelmingly certain that the Claimants would prevail at trial.
38. *Whether there is a realistic defence to the claims:* I do not consider that there is or can be a realistic defence to the claims. As explained earlier, I do not consider that the Convention has any application in case.
39. *The balance of convenience and compelling justification:* in *Multiplex*, [15], Ritchie J said:

“It is necessary for the Court to find, in relation to a final injunction, something higher than the balance of convenience, but because I am not dealing with the final injunction, I am dealing with an interlocutory injunction against PUs, the normal test applies. Even if a higher test applied at this interlocutory stage, I would have found that there is compelling justification for granting the *ex parte* interlocutory injunction, because of the substantial risk of grave injury or death caused not only to the perpetrators of high climbing on cranes and other high buildings on the Site, but also to the workers, security staff

and emergency services who have to deal with people who do that and to the public if explorers fall off the high buildings or cranes.”

40. In the case before me, there is more than a real risk of grave injury and death, as I explained earlier.
41. *Whether damages are an adequate remedy*: this criterion is plainly not applicable in the present case, where Claimants seek to restrain conduct which has caused and is capable of causing considerable non-pecuniary harm to many people.
42. *Procedural requirements relating to the conduct*: these are, principally, that: (a) the persons unknown must be clearly identified by reference to the tortious conduct to be prohibited; and (b) there must be clearly defined geographical boundaries. I am satisfied that these requirements have been fulfilled.
43. *The terms of the injunction must be clear*: the prohibited conduct must not be framed in technical or legal language. In other words, what is being prohibited must be clear to the reader. I am satisfied this requirement is made out. The prohibitions have been set out in clear words.
44. *The prohibitions must match the pleaded claim(s)*: I am satisfied that this requirement has been fulfilled.
45. *Temporal limits/duration*: the injunction is time limited to five years and provision is made for annual reviews. Furthermore, there is always the right of any person affected to come to court at any time to seek a variation or discharge of the injunction: *High Speed 2 (HS2) Limited v Persons Unknown* [2024] EWHC 1277 (KB), [58]-[59]. As the claim is being brought against Persons Unknown only, no return date hearing or final hearing is required.
46. *Service of the order*: this is an especially important condition. I am satisfied that the service provisions contained in the order will be sufficient to bring the injunction to the attention of the public.

Other matters requiring consideration

47. Cross-undertaking in damages: the order contains an appropriate cross-undertaking.
48. As some of what the order prohibits is criminal by virtue of the Airport's Byelaws (see above) I considered whether the injunction was necessary. In *Wolverhampton Travellers*, [216]-[217], the Supreme Court said that if byelaws are available to control the behaviour complained of then consideration must be given to them as a relevant means of control in place of an injunction.
49. I was and am satisfied that the existence of byelaws is not a sufficient means of control and that an injunction is necessary. They were not sufficient to stop the Extinction Rebellion protests at the Airport in 2019, described earlier. Although

handed down after the hearing in this case, I would also adopt my reasoning in *Wolverhampton City Council*, [35]-[43], on when it is appropriate to grant an injunction in support of the criminal law. I am satisfied the relevant tests are satisfied here.

50. In his Skeleton Argument at [26] in accordance with his duty of full and frank disclosure, Mr Vanderman set out some arguments that could be made against their application for an injunction.
51. Firstly, he said it could be argued that there is no justification for this application to have been made without notifying Persons Unknown. I addressed this earlier.
52. Second, he said it could be argued that there has been no direct threat against the Airport in particular, such that a precautionary injunction ought not to be granted. In other words, that there is not a sufficiently imminent risk. For the reasons set out above, I was satisfied there was the necessary imminence. It is not necessary to wait for the necessary harm to have occurred before applying for injunctive relief.

Conclusions

53. It was for the substance of these reasons I granted the injunction.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR JUSTICE BOURNE

ON: 24 June 2025

B E T W E E N : -

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

-and-



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

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

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

AND UPON the Claimants’ application dated 2 June 2025

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

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

AND UPON reading the application and the witness evidence in support

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

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

IT IS ORDERED that:

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

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

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

CLAIM NO: KB-2024-001765

Before Mr Justice Julian Knowles
On 20 June 2024

BETWEEN:-

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

Claimants

- v -

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

Defendant

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimants' claim by Claim Form, dated 12 June 2024

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

AND UPON hearing Counsel for the Claimants

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

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

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

IT IS ORDERED THAT: INJUNCTION

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

VARIATION

2

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

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

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

SERVICE AND NOTIFICATION

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

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

FURTHER DIRECTIONS

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

COMMUNICATIONS WITH THE CLAIMANT

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






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

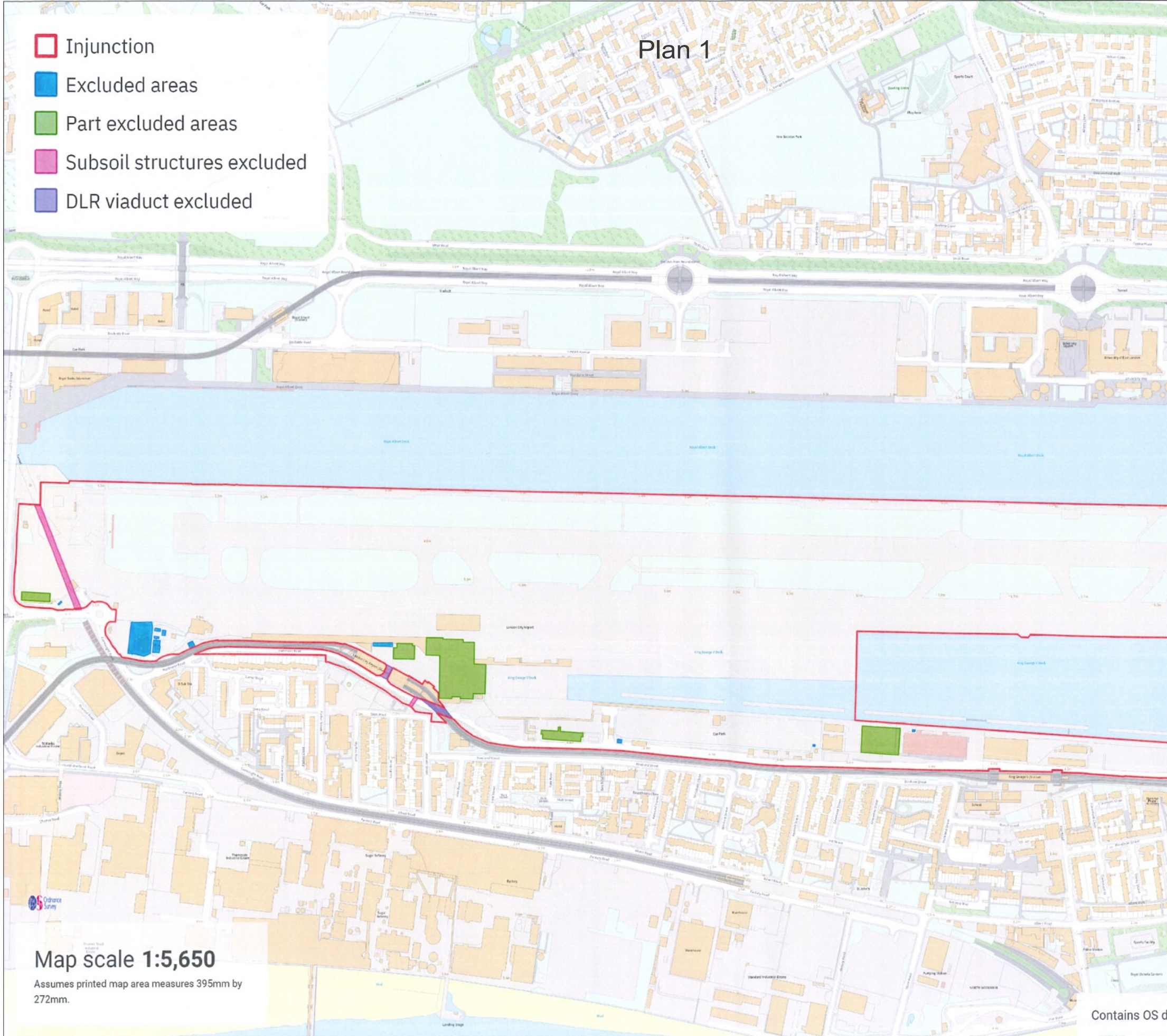
(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

Dated: 20 June 2024

SCHEDULE 1 - PLANS

Plan 1

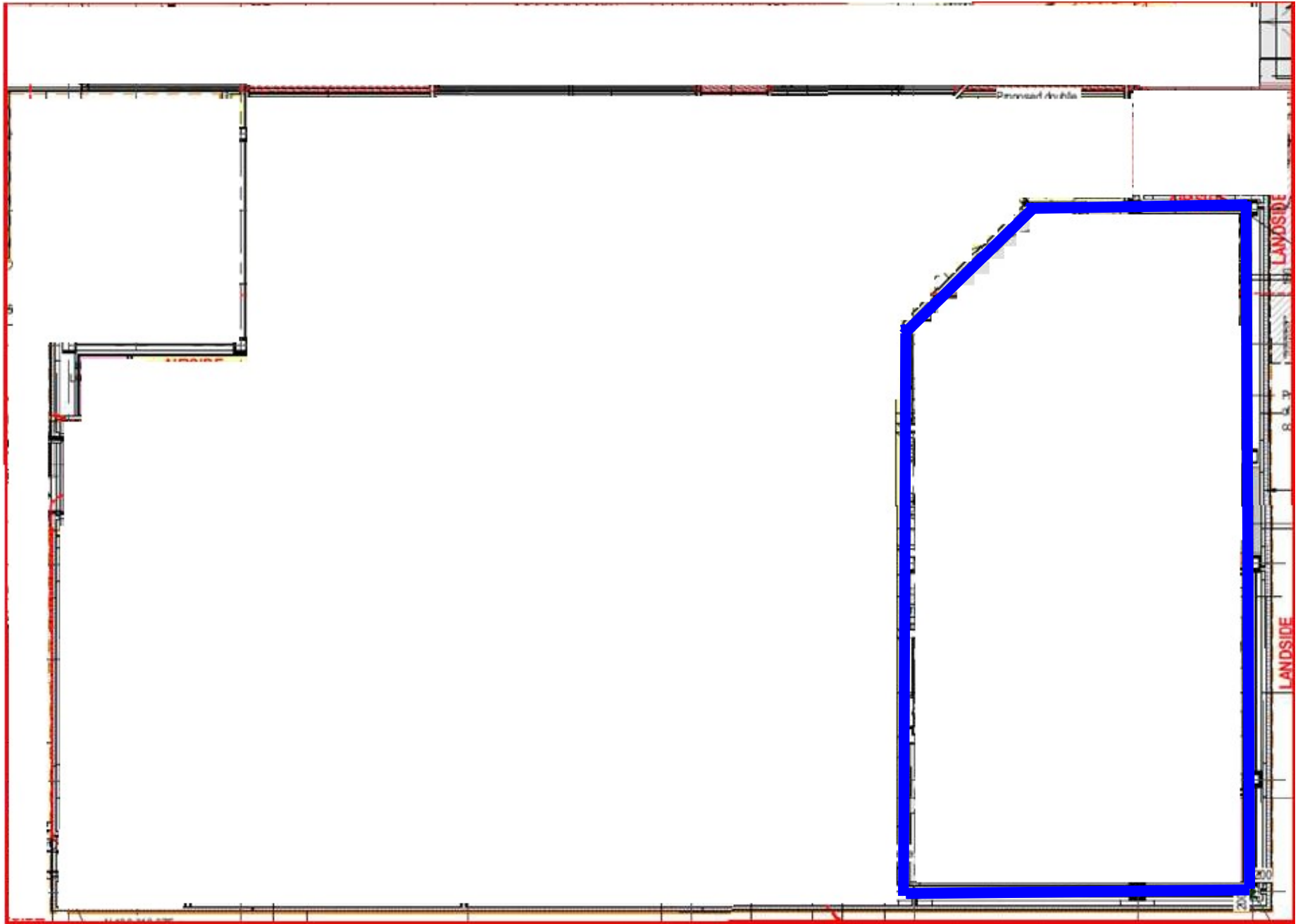
-  Injunction
-  Excluded areas
-  Part excluded areas
-  Subsoil structures excluded
-  DLR viaduct excluded

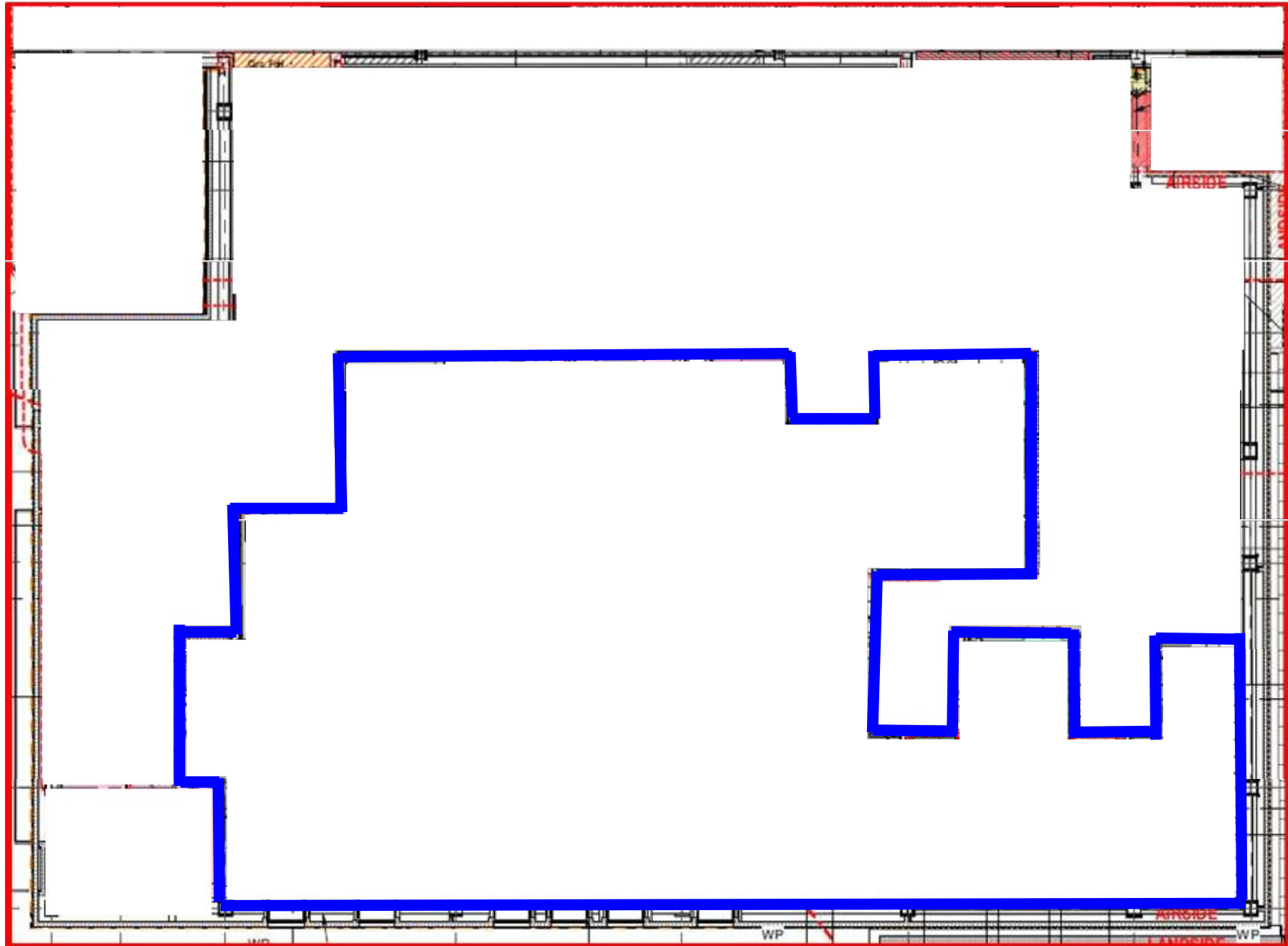


Map scale **1:5,650**
Assumes printed map area measures 395mm by 272mm.

Contains OS d



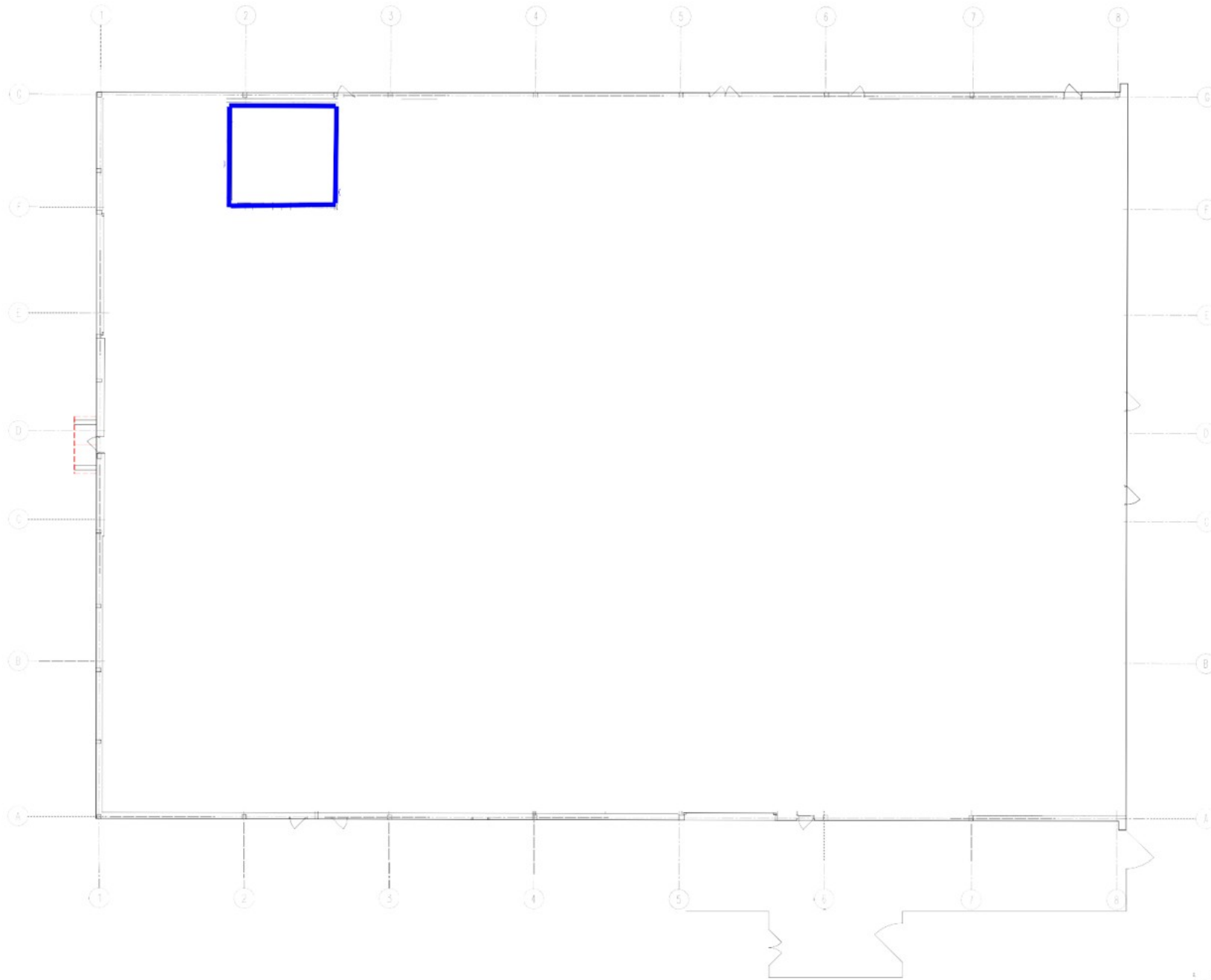




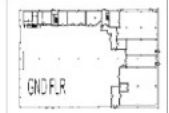
Blue Shed - Ground Floor

Plan 5

General Notes:



B. Issue Number Added	01/11/19
A. Issue Number Added	01/02/19



London City Airport, City Aviation, Aviation
 Rye, Essex, United Kingdom, T11 0FE

RECORD DRAWING

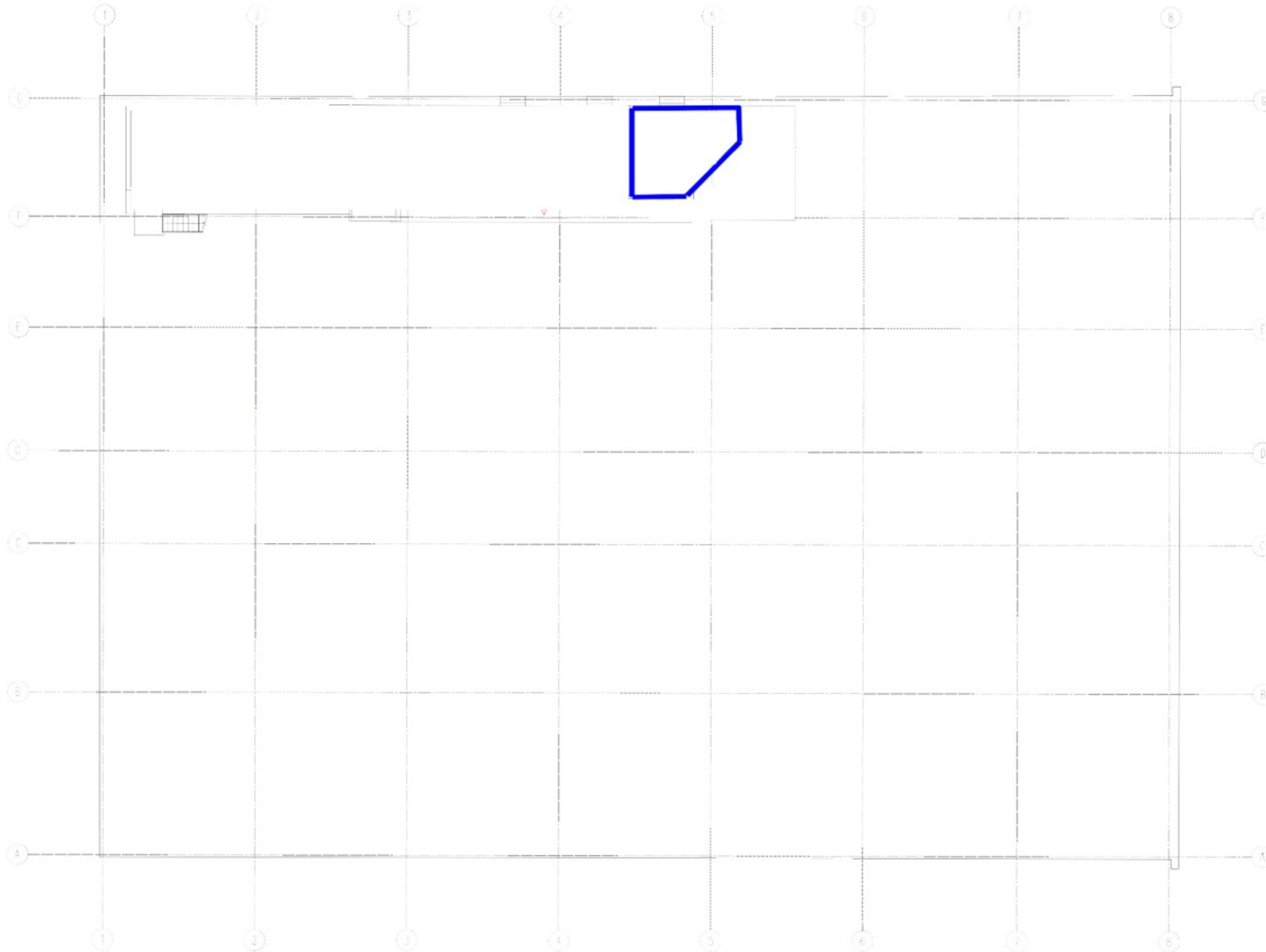
BLUE SHED
 Ground Floor
 General Arrangement Plan

04/00/19
 R/BS/9801
 1:100



Blue Shed - First Floor

Plan 6



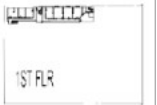
DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes

LEGEND
XXXX FIRE DOOR
XXXXX STANDARD DOOR

• From Author: N/A	23/11/18
• Date: N/A	23/11/18



London City Airport
Get closer.
London City Airport, City Aviation House
Royal Docks, London, E16 1FE

RECORD DRAWING

BLUE SHED

1st Floor
General Arrangement

000000
R/BS/9901



Jet Centre - Ground Floor

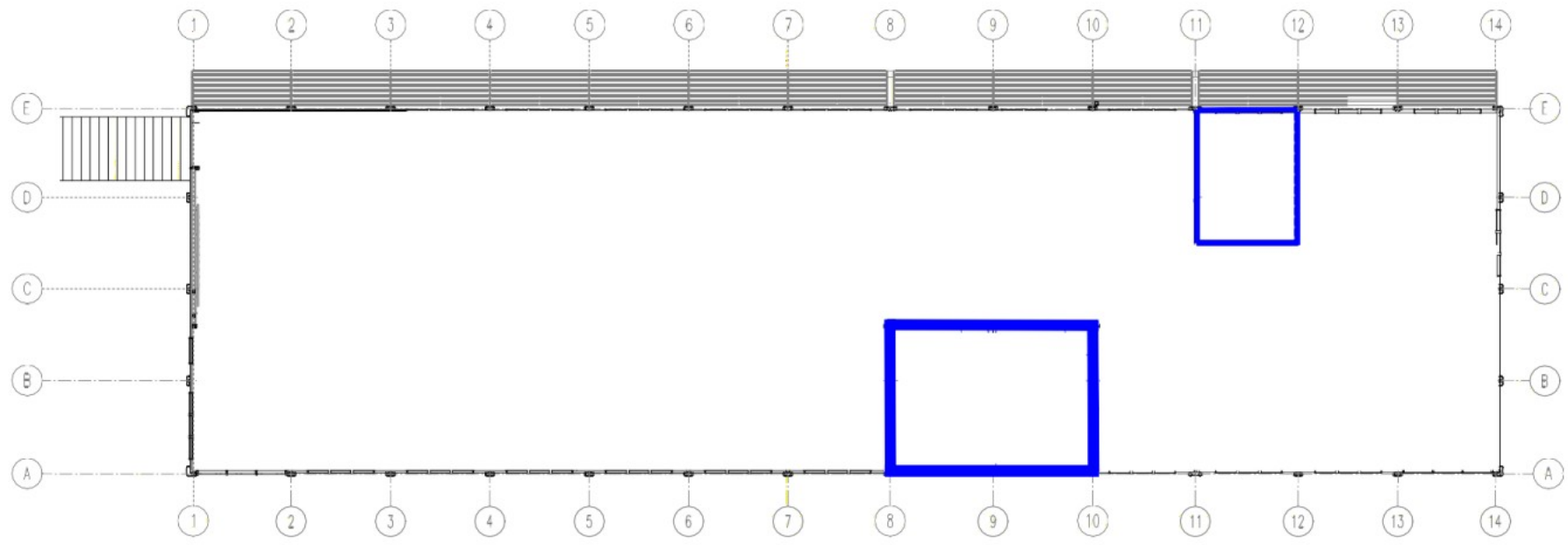
Plan 7

CONTRACT SCALE - 1/4" = 1'-0" (1:120) A50
 Approved Drawing

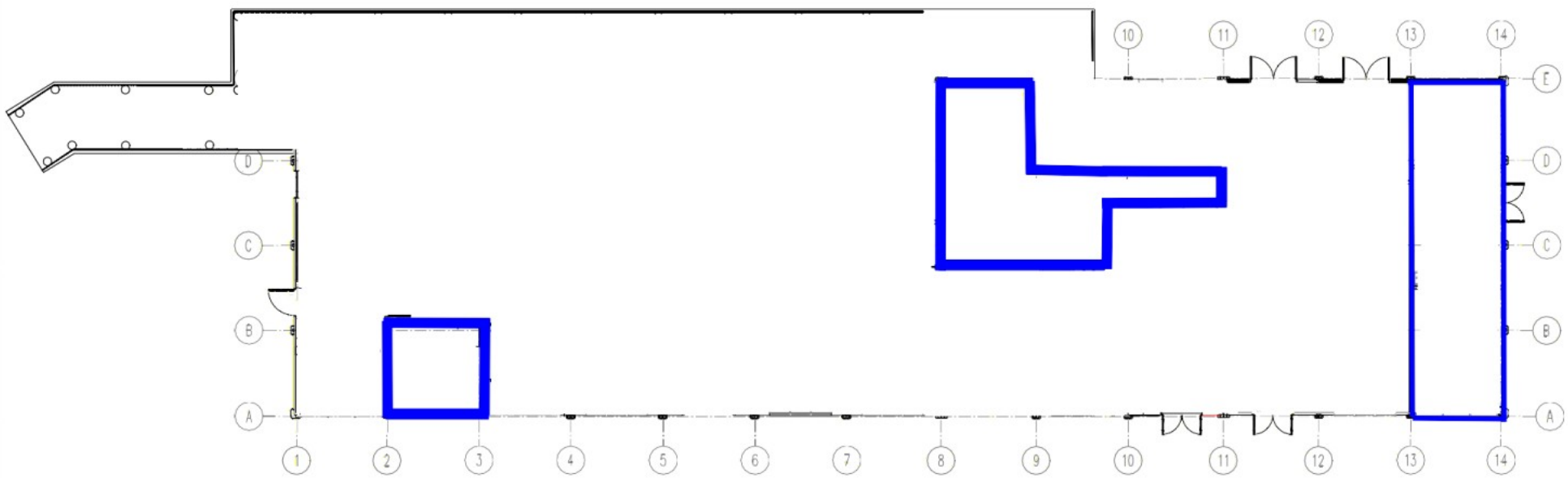
General Notes

LEGEND

-  Fire Door
-  Standard Door



Jet Centre - First Floor



C. Item Number Added	14/06/18
D. Item Number Deleted	18/06/18
E. Item Number Revised	20/06/18
F. Item Number Added	21/06/18
G. Item Number Deleted	21/06/18

G+ FLOOR

London City Airport
 Get closer

London City Airport, City Airport House
 Royal Dock, London, UK 200

RECORD DRAWING

JET CENTRE

Ground Floor Plan

Scale: 1/4" = 1'-0" (1:120)

R/JC/A/A/001

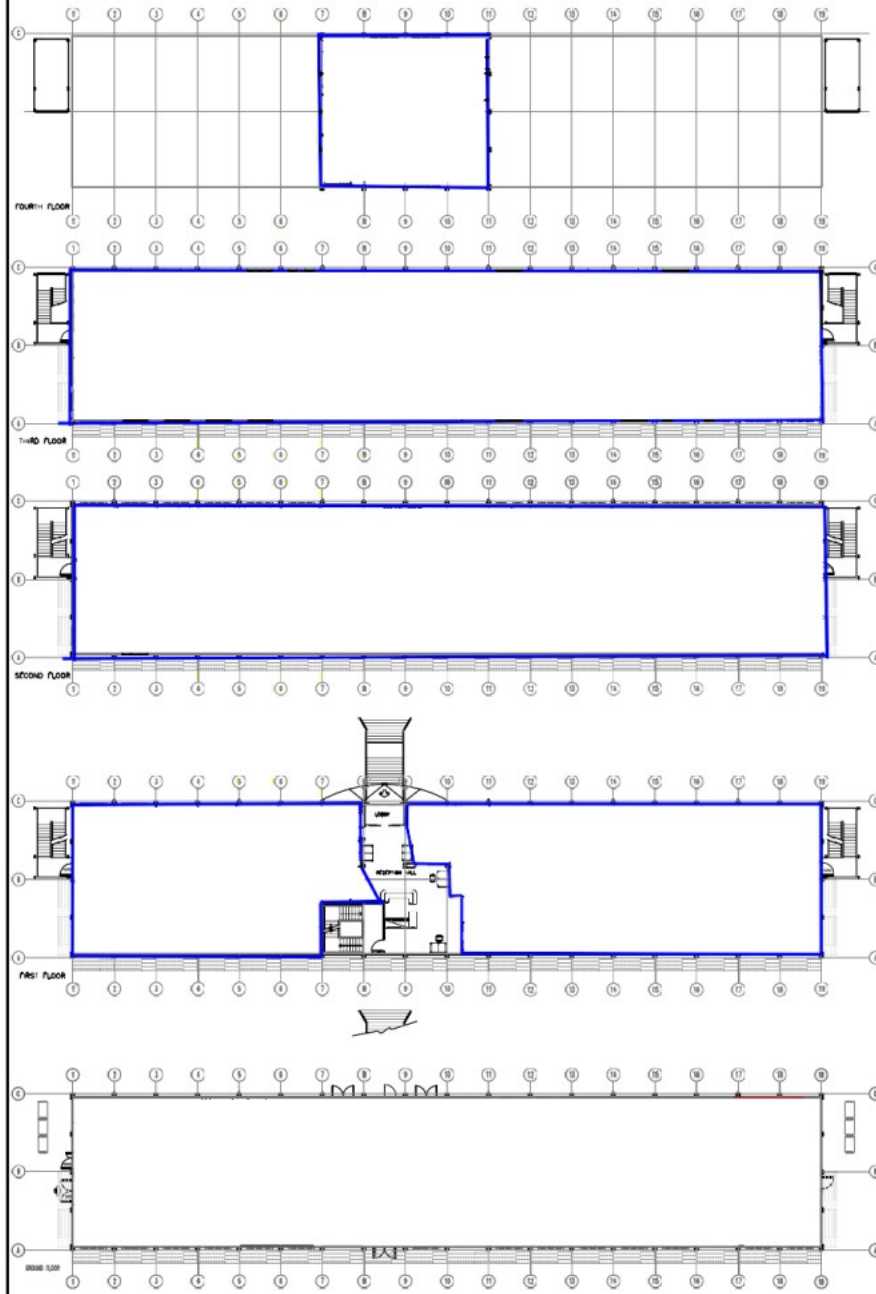
100



SCALE BAR 1:75 @ A1

City Aviation House

Plan 8



SCALE: 1/8" = 1'-0"

ARCHITECT: [Logo]
PROJECT: CITY AVIATION HOUSE
SHEET: S4-35
DATE: [Date]
DRAWN BY: [Name]
CHECKED BY: [Name]

SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS

- (1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.

- (2) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

Hearing Note – First Annual Review Hearing of Airport Injunctions

24 June 2025 (Court: Court 14)

Before: Bourne J (Bourne J)

For the Claimants: Timothy Morshead KC (“**TMKC**”) with Evie Barden

ATTENDANCE

No person appeared to oppose the applications, noted that the hearing had been listed for a day due to the possibility that individuals may have wished to attend and to make representations. TMKC advised Bourne J that the hearing had been notified as required by the various Orders and that, if any member of the public wished to attend or make representations, this hearing provided the opportunity to do so.

PURPOSE OF THE HEARING

The hearing was the first annual review of airport-related newcomer injunctions granted last year. TMKC explained that the various Claimants sought continuation of the existing injunctions, with draft forms of order to continue the injunctions and to address case-management matters.

Consideration given to the approach to be adopted, proceeded on the basis that the review was not a merits rehearing. The question to be considered was whether there had been a material change in the background circumstances diminishing the need for the injunctions, having assimilated sufficient background for that review.

NOTIFICATION AND SERVICE

TMKC submitted that notification had been given as required by the Orders. Bourne J was also taken to evidence from Mr Wortley explaining how the Orders had been served last year, with a typographical correction to paragraph 11.2: the date should read 21 June 2024, not 21 August 2024.

CLAIMANTS’ SUBMISSIONS

TMKC submitted that a concise, de minimis approach should be adopted, consistent with the approach in the Valero review hearing, because there had been no material change that undermined the basis on which the injunctions had been granted.

The Claimants’ position was that the injunctions should be reviewed together, rather than formally consolidated, because that was good case management. The Bourne J agreed.

TMKC submitted that there remained a compelling need for the injunctions. Although Just Stop Oil had made a March 2025 announcement suggesting that direct action would stop, subsequent communications and reports, including the GB News report and the 14/15 June 2025 Seeds of Rebellion event, made it unsafe to treat that announcement as a complete renunciation of direct action.

TMKC explained that the Claimants also relied on evidence that other groups, including Youth Demand, Extinction Rebellion and Fossil Fuel London, had not renounced direct action, and that a lone campaigner could act without affiliation to any group.

TMKC submitted that airports were particularly sensitive environments: the public cannot be kept out, protestors may intermingle with passengers, disruption can have cascading effects, and security concerns mean that a high premium is placed on orderly conduct.

TMKC referred to the police correspondence. The National Police Coordination Centre email taking account of the existence and effectiveness of injunctions; local police advice to London City Airport was that an injunction remained useful.

Discussion on Gatwick Airport and potential breach of their injunctions in July 2025, no knowledge as to whether committal applications were made and why not, if not.

TMKC submitted that, subject to the above, the absence of airport direct action since the injunctions were made was consistent with the injunctions working as a deterrent, rather than demonstrating that they were no longer necessary.

On proportionality and Convention rights, TMKC submitted that there had been no relevant change in the law, that the balancing exercise undertaken last year could be relied on subject to updated evidence, and that Article 10 and Article 11 rights could be exercised away from the airport areas.

FORM OF ORDER SOUGHT

TMKC invited Bourne J to retain the existing descriptive approach to “persons unknown”, rather than reducing the description to “persons unknown” only, noting Soole J’s approach in the Cambridge case, MBA Acres and the need for defendants to be defined as precisely as possible.

TMKC also invited the Court not to require permission before any application for committal. TMKC submitted that any issues arising from trivial or overzealous enforcement could be dealt with at the committal hearing, that no such applications had yet been made, and that there was no pattern of overzealous enforcement by the Claimants.

TMKC explained that the Claimants sought to homogenise the orders where appropriate. In relation to London City Airport, the relevant Claimants sought an amended plan to reflect a current ownership position, including an additional area let to a third party.

Hearing adjourned for Bourne J to consider matters ahead of issuing judgment.

Case No: KB-2024-001765

Neutral Citation Number: [2025] EWHC 2223 (KB)

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Royal Courts of Justice
Strand
London, WC2A 2LL

Wednesday, 26th August 2025

BEFORE:

MR JUSTICE BOURNE

BETWEEN:

LONDON CITY AIRPORT LTD & ORS

Claimants

- and -

PERSONS UNKNOWN

Defendants

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

JUDGMENT

(Approved)

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

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

7. I shall note increase the length of this judgment or extend the corpus of judicial discussions of this broad subject by repeating the statements of legal principle and factual considerations, which were set out by the judges when granting the injunctions last year.
8. It is, in particular, unnecessary for me to explore some distinctive characteristics of these cases which were considered by the judges, notably the fact that the claims concern a combination of (1) land owned by the claimants, (2) land not owned by the claimants but on which there is airport infrastructure and (3) public highways in and around the airports. The injunction granted to London City Airport covers land in category (1) only, whereas the injunctions in the other three cases cover all three categories. The claimants are not seeking any geographical expansion of the injunctions granted last year. London City Airport seeks, and I will grant, permission to amend to reflect a change of ownership of one specific area.
9. The nature of a review hearing of this kind was considered in *Wolverhampton* at paragraph 225, where the Supreme Court observed that the hearing:

“...will give all parties an opportunity to make full and complete disclosure to the court, supported by appropriate evidence as to how effective the order has been, whether any reasons or grounds for its discharge has emerged, whether there is any proper justification for continuance; and whether and on what basis, a further order ought to be made.”
10. In *High Speed Two (HS2) Ltd & Anor v Persons Unknown* [2024] EWHC 1277 (KB), Richie J described the court’s task at a review hearing:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Lower Ground, 46 Chancery Lane, London WC2A 1JE

Email: civil@epiqglobal.co.uk

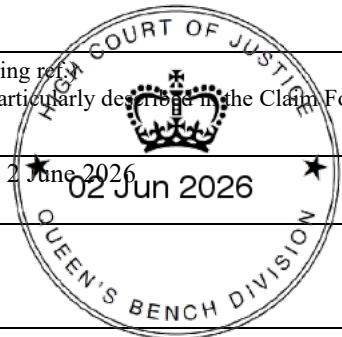
This transcript has been approved by the Judge

Application notice

For help in completing this form please read the notes for guidance form N244Notes.

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Name of court The High Court of Justice King's Bench Division		Claim no. KB-2024-001765
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)	
	H W F - [] [] [] - [] [] []	
Warrant no. (if applicable)		
Claimant's name (including ref.) London City Airport Limited and another		
Defendant's name (including ref.) Persons unknown (as more particularly described in the Claim Form)		
Date	2 June 2026 02 Jun 2026	



1. What is your name or, if you are a legal representative, the name of your firm?
 Eversheds Sutherland (International) LLP KB-2024-001765

2. Are you a Claimant Defendant Legal Representative
 Other (please specify) []

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

3. What order are you asking the court to make and why?
 An order to list a hearing (time estimate 1 day) to review the injunction made by orders of Julian Knowles J dated 20 June 2024 (“**the Julian Knowles J Orders**”) on 24 June 2026 or as close to that date as is convenient for the Court (“**the 2026 Review Hearing**”). The 2026 Review Hearing to be heard, in accordance with the Orders dated 24 June 2025 of Bourne J (“**the Bourne J Orders**”), with the review of the injunctions made in each of the claims KB-2024-001765, KB-2024-002132, KB-2024-002317 and KB-2024-2473.

4. Have you attached a draft of the order you are applying for? Yes No

5. How do you want to have this application dealt with?
 at a hearing without a hearing
 at a remote hearing

6. How long do you think the hearing will last? Hours Minutes
 Is this time estimate agreed by all parties? Yes No

7. Give details of any fixed trial date or period N/A

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

9. Who should be served with this application? The Defendants (Persons Unknown)

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

N244 Application notice (06.22)

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

- the attached witness statement
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

1. The orders of Julian Knowles J Orders are attached, together with the Bourne J Orders.
2. The Bourne J Orders and the Julian Knowles J Orders together provide that:
 - a) the injunctions granted pursuant to the Julian Knowles J Orders are to be reviewed at 12 month intervals; and
 - b) the hearing at which such review is to be considered is to be listed to “*be heard with the review of any injunctions made in all or any of the claims with case numbers KB-2024-002132, KB-2024-002317, and KB-2024-002473, , with a time estimate of 1 day.*”
3. The Claims are defined in the Bourne J Orders as the claims in actions KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (“**the Claims**”).
4. The Claimants in the remaining Claims also seek review of the injunctions and have, by Eversheds Sutherland (International) LLP, also made applications of even date to the same effect as this application.
5. The Court is invited to make an order on the papers in the form of the draft order. The Claimants will notify the Defendants of any order made by the Court and the application following the making of the order.

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.

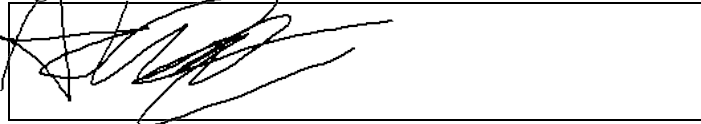
No

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

2

Month

June

Year

2026

Full name

Alexander James Wright

Name of applicant's legal representative's firm

Eversheds Sutherland (International) LLP

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

Legal Director

Applicant's address to which documents should be sent.

Building and street

Two New Bailey

Second line of address

6 Stanley Street

Town or city

Salford

County (optional)

Postcode

M	3		5	G	X	
---	---	--	---	---	---	--

If applicable

Phone number

+44 161 831 8582

Fax phone number

DX number

Your Ref.

292659.000057/WRIGHTAX

Email

alexwright@eversheds-sutherland.com

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BEFORE: The Honourable Mr Justice Linden

DATED: 10 June 2026



KB-2024-001765

BETWEEN:-

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

Claimants

- v -

PERSONS UNKNOWN AS DESCRIBED IN THE CLAIM FORM

Defendants

ORDER

UPON the Claimants' claim by the Claim Form dated 12 June 2024

AND UPON the Claimants' application for an injunction dated 12 June 2024

AND UPON the making of an injunction by order dated 20 June 2024 by Mr Justice Julian Knowles ("**the Orders**")

AND UPON the review hearings in each of the claims KB-2024-001765, KB-2024-002132, KB-2024-002317 and KB-2024-2473 ("**the Claims**") having been listed to be heard together on 24 June 2025 ("**the 2025 Review Hearing**")

AND UPON the Orders dated 24 June 2025 of Bourne J following the hearing of the 2025 Review Hearing in respect of the Claims

AND UPON the Claimants' application dated 2 June 2026 ("**the Application**")

AND UPON the Court making the order without a hearing on the basis a hearing would not be appropriate

IT IS ORDERED THAT:

1. The Orders shall be reviewed at a hearing to be listed on 30 June 2026, with a time estimate of 1 day.
2. The Claimants shall serve the Application and this order on the Defendants by carrying out the steps set out in paragraph 10 of the Orders.
3. A person affected by this order may make an application have to it set aside, varied or stayed within 7 days after the order is served on them.

Mr Justice Linden

10 June 2026

Wright, Alexander

From: KB Judges Listing Office <KBJudgesListingOffice@Justice.gov.uk>
Sent: 19 June 2026 15:39
To: Wright, Alexander; Owen, Elin; EvershedsCourtClerk; Stuart Wortley - New Mailbox (2026); NawaazAllybokus@eversheds-sutherland.com
Subject: KB-2024-001765 London City Airport Limited and another -v- Unknown

Dear all,

In accordance with the Order of The Honourable Mr Justice Linden dated 10th June 2026:

The **Review hearing** of the Injunction Orders made on 24th June 2026 following '*the 2025 Review Hearing*' has been listed for:

30th June 2026 for 1 day before a High Court Judge, in person.

The Judge and time of the hearing will be confirmed on the working day before on the Daily Cause List (from 3pm):
<https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list#kings-bench-judges-daily-cause-list>

Please treat this email as a formal listing notice.

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

Kind regards



Subash Vasudevan

Judges Listing Office Team Leader

8x8 Contact Centre Supervisor

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



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Party: Claimants
Name: A Wright
Number: First
Date: 11.06.26
Exhibits:
"AJW1 – AJW24"

CLAIM NO: KB-2024-1765

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -

**PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM**

Defendants

WITNESS STATEMENT OF

ALEXANDER JAMES WRIGHT

I **ALEXANDER JAMES WRIGHT** of Two New Bailey, 6 Stanley Street, Salford M3 5GX WILL SAY as follows:

1. INTRODUCTION

- 1.1 I am a Legal Director in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants. I am duly authorised to make this statement on the Claimants' behalf.
- 1.2 Save where otherwise stated, the facts contained in this statement are within my own knowledge and belief and, where they are not, I refer to the source of that information.
- 1.3 The documents to which I shall refer in the course of this statement are to be found in the exhibits marked "**AJW1 – AJW24**".
- 1.4 On 20 June 2024, Mr Justice Julian Knowles granted an injunction to restrain the Defendants from entering, occupying or remaining on London City Airport until varied, discharged or extended by further order ("**the 2024 Order**") – a copy of which is exhibited at **Exhibit AJW1**.
- 1.5 Paragraph 3 of the 2024 Order provided for the injunction to be reviewed by the Court periodically at intervals not exceeding 12 months.
- 1.6 The first review hearing was heard on 24 June 2025 ("**the First Review Hearing**") and the injunction granted pursuant to the 2024 Order was continued for a further 12 months by Orders dated 24 June 2025 of Bourne J ("**the 2025 Orders**") – copies of which are exhibited at **Exhibit AJW2**.
- 1.7 I make this witness statement for the purposes of the second annual review hearing which has been listed to be heard on 30 June 2026.

- 1.8 This witness statement supplements:
- 1.8.1 the witness statement of Alison Fitzgerald dated 11 June 2024 made on behalf of the First Claimant (“**the Alison Fitzgerald Statement**”);
 - 1.8.2 the witness statement of Stuart Wortley dated 11 June 2024 (“**the First S Wortley Statement**”); and
 - 1.8.3 the witness statements of Stuart Wortley dated 6 June 2025 (“**the Second S Wortley Statement**”) and 16 June 2025 (“**the Third S Wortley Statement**”) which were both made on behalf of the Claimants for the purposes of the First Review Hearing (together with the First S Wortley Statement, “**the S Wortley Statements**”).

2. **BACKGROUND**

- 2.1 The background to these proceedings is more particularly set out in the Alison Fitzgerald Statement and the S Wortley Statements.
- 2.2 For present purposes it is sufficient to note that the injunction was sought and obtained:
- 2.2.1 to protect London City Airport against the threat of direct/unlawful protest activity; and
 - 2.2.2 a number of injunctions were granted in similar terms in respect of various airports across the country between 20 June and 14 August 2024 – such injunctions being:

	Airport(s)	Action Number	Judge / Date of Order
1	London City Airport	KB-2024-001765	Mr Justice Julian Knowles 20 June 2024
2	Manchester Airport, Stansted Airport and East Midlands Airport	KB-2024-002132	HHJ Rosalind Coe 5 July 2024
3	Heathrow Airport	KB-2024-002210	Mr Justice Julian Knowles 10 July 2024
4	Leeds Bradford Airport, London Luton Airport and Newcastle International Airport	KB-2024-002317	Mr Justice Ritchie 18 July 2024 (amended by the slip rule on 19 July 2024)
5	Gatwick Airport	KB-2024-002336	Mr Justice Ritchie 19 July 2024
6	Birmingham Airport, Bristol Airport and Liverpool Airport	KB-2024-002473	Mr Justice Jacobs 6 August 2024
7	Southend Airport	KB-2024-002596	Mrs Justice Farbey 14 August 2024

- 2.3 This firm acted in four out of the seven actions listed above (numbers 1, 2, 4 and 6) (“**the Claims**”). However, our instructions arrived over time rather than all at once, and so multiple hearings were needed, despite the common ground between the different matters.
- 2.4 Although the precise terms of the injunction orders granted in the Claims vary slightly, each of them provides for an annual review.
- 2.5 So as to make better use of the Court’s time, the various Claimants in the Claims identified numbers 1, 2, 4 and 6 in the table above in paragraph 2.2 agreed in 2025 to join together and to ask the Court to undertake the first annual review of the injunctions granted in the Claims at the same hearing.
- 2.6 As noted above, Bourne J continued the injunctions for a further 12 months at the First Review Hearing. I exhibit a copy of the judgment of Bourne J from that hearing at **Exhibit AJW3**.

2.7 I make this witness statement in support of the second annual review of the injunctions granted pursuant to the 2024 Order in respect of London City Airport. I will be repeating or adopting much of the content of this witness statement in my statements in support of the annual reviews of the injunctions granted in the other actions.

3. **THE 2024 ORDER AND THE 2025 ORDERS**

3.1 The 2025 Order provides, at paragraph 1, that the 2024 Order *“shall remain in full force and effect, subject to the variations thereto set out in the schedule to this order (and subject to review, as provided for in paragraph 3 of the Knowles J Order)”*.

3.2 The 2024 Order, as varied by the 2025 Order, provides:

3.2.1 at paragraph 1, for the injunction to last until *“ 20 June 2029 or final determination of the claim or further order in the meantime, whichever shall be the earlier...”*.

3.2.2 at paragraph 3 that:

“The injunction contained at paragraph 1 of this Order shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court’s list). Such hearing shall be listed to be heard with the review of any injunctions made in all or any of the claims with case numbers KB-2024-002132, KB-2024-002317, and KB-2024-002473, with a time estimate of 1 day. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the review hearing”.

3.3 The 2026 review hearing is listed to be heard on 30 June 2026, being a date which complies with the requirements of the 2025 Order and the 2024 Order (as varied).

3.4 I will file and serve a further witness statement confirming the steps taken by the Claimants to file and serve the Claimants’ evidence and additional documents ahead of the 2026 annual review hearing.

4. **SERVICE OF THE 2025 ORDERS**

4.1 The 2025 Order was served in accordance with paragraph 9 of the 2024 Order by:

4.1.1 a copy of the relevant 2025 Order being uploaded to the airport’s injunction website. I have been informed by Claire Hortop that a copy of the relevant 2025 Order was uploaded by a relevant member of staff to the London City Airport injunction website on 27 June 2025. A printout from London City Airport’s injunction website is exhibited at **Exhibit AJW4**, confirming that a copy of the relevant 2025 Order was uploaded and continues to be available on that website;

4.1.2 the continuing presence of warning notices at the locations marked with an “X” on the plans to the 2024 Order (being the plan at **Exhibit AJW5**), which I cover further below at paragraphs 4.4 and 4.5; and

4.1.3 whilst not strictly required under the terms of the 2024 Order, affixing a copy of the 2025 Order at the locations marked with an “X” on the plan to the 2024 Order (being the plans at **Exhibit AJW5**). I have been informed by Claire Hortop that a copy of the 2025 Order was so affixed at the relevant locations on or around 27 June 2025.

- 4.2 In addition to the above steps, paragraph 9 of the 2024 Order required a copy of the 2025 Order to be served by an email sent to each of the email addresses listed in Schedule 3 to the 2024 Order. During the course of preparing this witness statement and for the second annual review hearing more generally, I was unable to locate a copy of such an email on this firm's file for these proceedings. I therefore subsequently:
- 4.2.1 instructed relevant colleagues to carry out a search of our document management system and the email accounts of Stuart Wortley (who had conduct of these proceedings on behalf of the Claimants at the time of the First Review Hearing but who has since left my firm) and Emma Payne (who assisted Mr Wortley at the time and who has also since left my firm) for such an email and have been informed that such an email could not be located; and
- 4.2.2 spoke with Mr Wortley by telephone on 9 June 2026 to discuss the matter of such an email further. Mr Wortley advised me that he could not readily recall sending such an email and that he would need to consult this firm's file to confirm matters.
- 4.3 As a consequence, I promptly served the 2025 Order by email on 9 June 2026, a copy of which is exhibited at **Exhibit AJW6**.
- 4.4 In addition to the above steps, an updated Warning Notice was affixed at the locations marked with an "X" on the plans to the 2024 Order so as to ensure that this reflected the amended injunction order plan, as approved at the First Review Hearing (pursuant to the Claimants' application dated 17 June 2025). I am informed by Claire Hortop that the updated Warning Notices were affixed at the relevant locations by 6 August 2025.
- 4.5 I am told by Claire Hortop, Head of Legal at London City Airport that a regime is in place at London City Airport to ensure that the warning notices remain in place, that replacement warning notices are affixed as and when necessary and that warning notices continue to remain in place at the required locations – in accordance with the terms of the 2024 Order.
- 4.6 It came to my attention during the course of preparing this witness statement that there was an apparent formatting issue, as it appeared to me, with the copy of the 2025 Order available on the London City Airport injunction website – in that part of plan 1 was not visible for some reason. Having reviewed this firm's file for these proceedings I can confirm that the uploaded copy reflects the sealed copy of the 2025 Order issued by the Court following the 2025 Review Hearing. As noted above, at paragraph 4.4, an updated Warning Notice was affixed at the locations marked with an "X" on the plans to the 2024 Order, which show the amended injunction order plan, as approved at the First Review Hearing, in full.

5. **THE AIRPORT BYELAWS AND PLANS**

- 5.1 As more fully explained in the Second S Wortley Statement:
- 5.1.1 the injunction which was granted in this action was the first to be considered and granted by the Courts and is limited to the area to which the Claimants would be entitled to a remedy in trespass, based strictly on their proprietary interests;
- 5.1.2 the approach taken in granting the injunctions in the subsequent actions (i.e. actions 2, 4 and 6 in the table above) were based on the relevant airport byelaws (and therefore extend to all of the land which is subject to the byelaws including land over which the Claimant(s) in those proceedings would not be entitled to legal possession – including for example highways land and areas which are demised to third parties).
- 5.1.3 The Claimants decided not to ask the Court to expand the injunction granted in these proceedings based on the analysis and arguments which found favour in later cases. Instead, it invited the Court to review the injunction on the same basis as it was obtained in 2024 – which the Court did.
- 5.2 The injunction in this case currently extends to the land edged red on Plan 1 (London City Airport) to the 2024 Order – a copy of the relevant plan is exhibited at **Exhibit AJW7**.

5.3 I am informed by Claire Hortop, Head of Legal at London City Airport and other members of her in-house legal team that:

5.3.1 the plans attached to the Claim Form remain accurate;

5.3.2 third party occupiers within the 'red line' of the injunction order boundary will be informed ahead of the second annual review hearing that an application has been made to continue the injunction in respect of London City Airport for a further 12 months;

5.3.3 there is an anticipation of potential future protests in response to London City Airport 's Airspace Change Programme ("ACP") – which is a proposal to change the arrival process for specific aircraft, including the Airbus A320neo; and

5.3.4 Previous protest activity by Extinction Rebellion, in 2019, which involved unlawful activity and major disruption – including:

5.3.4.1 a protester gaining entrance to the roof of one of the airport's buildings;

5.3.4.2 a protester laying on top of a plane;

5.3.4.3 a protestor forcing a jet to turn around on the runway;

5.3.4.4 protestors blocking roads; and

5.3.4.5 protestors gluing themselves to roads.

A printout, taken from the Reuters website, reporting on this incident is exhibited at **Exhibit AJW8**.

6. **HEALTH AND SAFETY RISK / RISK OF HARM**

6.1 The health and safety risks and risks of harm presented by direct/unlawful protest activity at London City Airport are detailed in the Alison Fitzgerald Statement. By way of summary, however, these include but are not limited to:

6.1.1 the Claimants' ability to ensure:

6.1.1.1 the safe operation of aircraft;

6.1.1.2 the safe movement of vehicles and persons on the runways / taxiways and other operational areas, to avoid collisions and damage to aircraft;

6.1.1.3 the ability of firefighting and rescue services to respond to incidents or accidents with the necessary urgency;

6.1.2 the inevitable delays or cancellations to scheduled flight arrivals and departures that direct/unlawful protest activity would bring, resulting in inevitable financial harm, operational disruption, and more general disruption and delay to members of the public;

6.1.3 the diversion of the Claimants' and wider public resources (e.g. police resources), which would be diverted as a matter of urgency into responding to any emergency caused by direct/unlawful protest activity; and

6.1.4 impacting counter-terrorism and police operations at London City Airport.

6.2 I understand from Claire Hortop, Head of Legal at London City Airport that the potential implications for counter-terrorism operations the airport is of particular concern in the light of the recent raising of the terrorism threat level in the UK by the Joint Terrorism Analysis Centre, on 30 April 2026, from 'substantial' to 'severe' – meaning that "*an attack is highly*

likely". The raising of this threat level is evidenced by the printout taken from MI5's website ([Threat Levels | MI5 - The Security Service](#)) which is exhibited at **Exhibit AJW9**.

6.3 In relation to such potential implications for counter-terrorism operations, I would draw attention to:

6.3.1 the previous evidence of Alison Fitzgerald, Chief Executive Officer of London City Airport, in these proceedings as set out at paragraph 32 in the Alison Fitzgerald Statement:

"32. London City Airport is a potential target for terrorist activity (which explains why the airport is routinely patrolled by police carrying firearms). It goes without saying that any protest at London City Airport would be a distraction for the police and our security team which are constantly undertaking counter-terrorism work to keep members of the public safe".

6.3.2 the following comments of Ritchie J in his judgment in *Leeds Bradford Airport Ltd & Ors v Persons Unknown* [2024] EWHC 2274 (KB) (being his judgment from the hearing at which the 2024 Orders in action KB-2024-002317 were granted) at [30-31]:

"30. Secondly, I need to look at the institutions which are bringing these applications. Airports are a part of the national infrastructure which are acutely sensitive to terrorist threats and are highly regulated in relation to safety, maintenance and security. They are also complicated organisations, involving the movement of thousands of members of the public, close to highly combustible materials and within fast-moving, huge pieces of equipment. Such organisations are acutely sensitive to chaotic disruption caused by unlawful direct action.

31. I also take into account the fear, which I think is justified, of the Chief Executive Officers, that terrorism is facilitated by chaos..."

6.3.3 the recent incident at Southend Airport, referred to further below at paragraph 13.2, which demonstrates, in my view, the heightened security concerns that there are at airports and how the activities of those at them can be interpreted by airport security services as a possible protest action, giving rise to a potential security threat – necessitating the need for energy and resources to be diverted in order to address them.

7. **CONTINUING THREAT: PROTESTS TARGETING THE OIL & GAS SECTOR – POST 2025 REVIEW HEARING**

7.1 I am informed by Claire Hortop, Head of Legal at London City Airport that there have been no incidents of protests (lawful or otherwise) at London City Airport since the 2025 Review Hearing.

7.2 I exhibit at **Exhibit AJW10** a chronology of protest incidents since the 2025 Review Hearing which have targeted the oil and gas sector and organisations perceived to support or facilitate it ("**the Chronology**"), together with a printout of the relevant websites referenced within it for each incident – the source of which are noted in the Chronology. I would draw particular attention to:

Date	Location	Brief Details
03 July 2025	London	Extinction Rebellion supporters blockaded the entrance to the Energy Insurance London Conference.
05 July 2025	UK Wide	'Insure our Survival' Campaign: a seven-day environmental / anti-fossil fuels protest as part of Extinction Rebellion's Summer of Action.
05 July 2025	London Oxford Airport	Extinction Rebellion supporters marched to the airport to draw attention to the number of

		private jets carrying what were asserted to be ultra-wealthy passengers.
07 July 2025	Various, UK	Members of Extinction Rebellion protested outside of different branches of insurance brokers, Marsh, as part of the national day of action against insurance businesses.
09 July 2025	Inverness Airport	Protestors led by Extinction Rebellion Scotland protested outside the terminal to campaign against private jet company Blackbird Air.
09 July 2025	London	Extinction Rebellion supporters disrupted the British Insurance Awards by blocking the red carpet. Two activists were detained after getting into the venue and planning to take to the stage to drop a banner.
11 July 2025	Shrewsbury	Extinction Rebellion supporters targeted the offices of Marsh and Howden in an insurance-related protest relating to fossil fuels with protestors calling for the support of new projects to be ended.
16 July 2025	London	Extinction Rebellion supporters targeted AIG as part of the Insure Our Survival campaign.
21 July 2025	Reading	Two banners appeared above the A329 motorway reading "Your Planet Needs You" and "Tax The Rich". Extinction Rebellion claimed responsibility.
21 July 2025	Oxford	Extinction Rebellion supporters staged a 'crime scene' at Barclays, protesting about the bank financing the fossil fuel industry.
23 July 2025	London	Five Extinction Rebellion protestors dressed as scientists and occupied the lobby of Prudential Regulation Authority demanding capital requirements on fossil fuels in the insurance and banking sectors.
26 July 2025	Edinburgh	Ten Greenpeace activists arrested after suspending themselves from a bridge outside Edinburgh. They dangled themselves 25m above the water line, stopping a tanker delivering for 24 hours
28 July 2025	London	Fossil Free London activists dressed as robbers emblazoned with the Norwegian flag staged a "heist" at the Bank of England to highlight the "daylight robbery" that approval of the application for exploitation of the Rosebank oil field would entail.
22 August 2025	UK Wide	"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.
05 September 2025	London	Three climate protestors from Climate Resistance were carried out after disrupting the Reform UK party conference.
08 September 2025	London	Extinction Rebellion announce its 'Insure Our Survival' campaign, set to run from 8-22 September with large-scale demonstrations planned, targeting companies that are enabling fossil fuel projects.
09 September 2025	London	Extinction Rebellion protestors staged protests at the London offices of AXA and AIG, blocking access to the buildings.
15 September 2025	Reading	Extinction Rebellion activists "held a "die-in" at Barclays Bank in Reading, where protestors lay on the ground to simulate death, to link the funding of fossil fuels projects with climate change and global deaths.

16 September 2025	Ipswich	Extinction Rebellion activists took part in a global demonstration against large insurance companies calling on the companies to stop funding fossil fuels.
18 September 2025	Stansted Airport	Two young people who spray-painted two private jets at Stansted Airport in June 2024 were found guilty of criminal damage at Chelmsford Crown Court. They had cut through the wire perimeter fence and sprayed paint onto two private jets as part of a Just Stop Oil protest, to demand the UK government to negotiate a treaty to phase out oil and gas by 2030.
22 September 2025	Glasgow	Extinction Rebellion held a protest outside of AXA's office accusing it of "keeping killers safe" by insuring or investing in, amongst other things, fossil fuel projects.
05 November 2025	London	Fossil Free London campaigners disrupted BP panel event at Simmons & Simmons LLP.
04 December 2025	London	Fossil Free London campaigners disrupted Oil Executive awards dinner in London with attendees including Shell, BP and Ithica Energy.
15 January 2026	London / Manchester	Environmental and humanitarian protestors rallied at Zurich offices demanding it drops contracts with Shell, Chevron, Maersk and General Dynamics.
19 January 2026	London	Extinction Rebellion staged a protest outside Macquarie Group Headquarters to protest against expansion at Farnborough Airport. Two activists occupied the entrance to the building unfurling a banner that calls for a ban on private jets and urged the investment firm to sever its connection to fossil fuels.
05 May 2026	London	Activists from Fossil Free London staged a protest outside Equinor's offices, piling life-sized body bags outside the building while one campaigner dressed as an oil executive stood on top of them.
06 May 2026	York	Protestors, claiming to be associated with Boycott Bloody Insurance, protested outside Aviva's boardroom in York whilst they had their AGM.
06 May 2026	London	Fossil Free London protested outside Shell HQ ahead of quarterly profits which are due to be announced on 7 May 2026.
07 May 2026	London	Climate activists disrupted Barclays shareholder meeting.

7.3 The incidents set out above and in the Chronology demonstrate that there continues to be a strong and active protest movement against the fossil fuel industry and associated sectors/industries more broadly which shows no signs of abating.

8. ENVIRONMENTAL / CLIMATE CAMPAIGN GROUPS

8.1 Just Stop Oil (JSO)

8.1.1 The S Wortley Statements, made on behalf of the Claimants for the purposes of the First Review Hearing, explained that:

8.1.1.1 JSO had announced on 27 March 2025 that it was "*hanging up the hi vis*" and that it was, in short, ceasing its activities; and

8.1.1.2 contradictory statements were subsequently made on behalf of and/or by JSO which suggested that the Just Stop Oil campaign was a continuing campaign notwithstanding the above announcement.

8.1.2 I note that:

8.1.2.1 the JSO website:

(a) states at various points that “*Just Stop Oil ended its street campaign in 2025*” and/or “*In 2024 Just Stop Oil successfully won its original demand of ‘no new oil and gas’ and on March 27th 2025 announced an end to the campaign of action. However, our supporters will continue to tell the truth in court, to speak out for our political prisoners and to help build what comes next*” – relevant screenshots, taken by my colleague Meghan Clifford on 3 June 2026, are exhibited at **Exhibit AJW11**;

(b) states on its homepage, directly above a link to the campaign group Take Back Power’s website (a campaign group which I cover further below at paragraph 0), that:

“!! New project alert !!

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

Take back POWER”

A screenshot, taken by my colleague Meghan Clifford on 3 June 2026, showing this is exhibited at **Exhibit AJW12**.

(c) further states on its homepage that:

“Just Stop Oil launched in 2022, demanding the UK Government stop licensing all new oil, gas and coal projects. In 2024 the UK government met our original demand. Civil resistance works.

But revolutionary change is needed now more than ever. Corrupt politicians are serving the interests of billionaires. Ordinary people are struggling to survive, and the media is shifting blame from their mates on mega yachts to the people in small boats. Meanwhile, the world is getting hotter and hotter. Nothing short of a political and economic revolution is going to get us out of this mess.

*It’s time to **Take Back Power**”*

A screenshot, taken by my colleague Meghan Clifford on 3 June 2026, showing this is exhibited at **Exhibit AJW13**.

8.1.2.2 I am not aware of any incidents involving direct/unlawful protest activity attributable to JSO since the 2025 Review Hearing; and

8.1.2.3 notwithstanding the above, the JSO website and affiliated social media channels (including Instagram, Facebook and Twitter) appear to remain active – as evidenced by the printouts, taken by my colleague Meghan Clifford on 3 June 2026, exhibited at **Exhibit AJW14**.

8.1.3 Noting the reference on the JSO homepage and link to the Take Back Power website, it strongly appears to me that Take Back Power is a successor to JSO and I refer also to an article in the Guardian newspaper from 25 April 2025, a copy of which is exhibited at **Exhibit AJW15**, which states:

“Many of those involved with [Take Back Power] are seasoned activists – despite being in their early 20s – having taking part in actions with Extinction Rebellion, Just Stop Oil, Animal Rising and other groups in recent years”.

8.2 Take Back Power

8.2.1 I became aware of the group in or around December 2025 when activists threw custard and apple crumble at a case containing the crown jewels at the Tower of London (an article, taken by my colleague Meghan Clifford on 3 June 2026, from Take Back Power’s website on this incident is exhibited at **Exhibit AJW16**).

8.2.2 Take Back Power describes itself on its homepage as “a nonviolent civil resistance group in the UK. We aim to put the 99% in charge through citizen’s assemblies. We are ordinary people from all walks of life who believe that in order to fix Britain, we have to tax the rich. And we don’t think the rich should get a veto. We want the people to decide how we tax the rich through a legally-binding citizen’s assembly – a House of the People. It’s time for the 99% to have 99% of a say!” (a printout of Take Back Power’s website, taken by my colleague Meghan Clifford on 3 June 2026, is exhibited at **Exhibit AJW17**).

8.2.3 I note that there is an ‘about us’ section on Take Back Power’s website which states:

“What is Take Back Power?”

Take Back Power is a nonviolent civil resistance group in the UK. We aim to put the 99% in charge through citizen’s assemblies. We are ordinary people from all walks of life who believe that in order to fix Britain, taxing the rich is an essential first step, and we want ordinary people to decide how.

Why does Take Back Power engage in disruptive direct action?

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

Relevant printouts, taken by my colleague Meghan Clifford on 3 June 2026, are exhibited at **Exhibit AJW18**.

8.2.4 Take Back Power’s website details a number of incidents involving their activists/supporters since December 2025:

3 December 2025	Activists entered the lobby of The Ritz and dumped large piles of horse manure beneath the hotel's 25-foot Christmas tree.
6 December 2025	Activists threw custard and apple crumble at a case containing the crown jewels at the Tower of London
6 February 2026	Two activists locked themselves in front of Carriage Gate, blocking access to Parliament
5 March 2026	Fifteen Take Back Power activists were arrested by the police on suspicion of conspiracy to commit theft.
14 March 2026	Take Back Power activists took various food items, without paying, from supermarkets across four UK cities: Manchester, London, Exeter and Truro
19 April 2026	Seven Take Back Power activists were arrested by the police on suspicion of conspiracy to commit theft.
27 April 2026	Take Back Power activists staged a protest at Sotheby’s auction house.
30 April 2026	Take Back Power activists occupied a Ferrari dealership in Berkeley
1 May 2026	Take Back Power activists: <ul style="list-style-type: none"> • took various food items, without paying, from a supermarket in Brixton; • occupied the luxury department store Liberty; and • disrupted access to the luxury hotel, Claridge’s.

Printouts, taken by my colleague Meghan Clifford on 3 June 2026, from the Take Back Power website covering the above incidents are exhibited at **Exhibit AJW19**.

8.2.5 A clear target of the Take Back Power group is the 'super-rich'. This gives rise to particular concern for the Claimants and London City Airport because:

8.2.5.1 there are private jet facilities at London City Airport and indeed at all of the airports which are the subject of the Claims;

8.2.5.2 the 'super-rich' are users, if not perceived users, of such facilities;

8.2.5.3 JSO and Extinction Rebellion activists have previously targeted private jet facilities at airports. I refer to:

(a) the incidents referred to in the table above at paragraph 7.2 on:

(1) 5 July 2025: Extinction Rebellion supporters marched to London Oxford Airport to draw attention to the number of private jets carrying ultra-wealthy passengers;

(2) 9 July 2025: Protestors led by Extinction Rebellion Scotland protested outside the terminal to campaign against private jet company Blackbird Air; and

(3) 19 January 2026: Extinction Rebellion staged a protest outside Macquarie Group Headquarters to protest against expansion at Farnborough Airport. Two activists occupied the entrance to the building unfurling a banner that calls for a ban on private jets and urged the investment firm to sever its connection to fossil fuels.

(b) the previous incident at Stansted Airport, on 20 June 2024, which involved two Just Stop Oil activists unlawfully gaining entry to the airport and spray-painting two private jets – for which those involved were found guilty of criminal damage at Chelmsford Crown Court in September 2025, receiving (a) a five month custodial sentence suspended for twelve months; and (b) a six week custodial sentence suspended for eight months plus 20 days rehabilitative activity. It was reported that this necessitated extensive professional cleaning, at a cost of c.£12,000 (a copy of relevant articles taken from JSO's website, printed out by my colleague Meghan Clifford on 3 June 2026, are exhibited at **Exhibit AJW20**; and

8.2.5.4 Take Back Power has a clear and evidenced history for taking direct action.

8.2.6 I am instructed that the Claimants are accordingly very concerned that London City Airport will become the focus of direct action by members of Take Back Power, given the presence of private jet facilities at the airport, in the absence of the continuation of the protection afforded by the injunction.

8.3 Extinction Rebellion

8.3.1 Extinction Rebellion remains an active organisation both in the UK and internationally, as evidenced by the incidents detailed in the Chronology, and one which, noting the concerns set out immediately above, has directly targeted action against private jet facilities in the period since the 2025 Review Hearing.

8.4 Fossil Free London

8.4.1 Fossil Free London’s website (fossilfreelondon.org) describes the protest group as “a climate justice organisation dedicated to disrupting the fossil fuel industry here in our city. Through direct action, strategic campaigning, and movement building, we challenge the social licence of elites and corporate polluters”. A screenshot, taken by my colleague Meghan Clifford on 3 June 2026, showing this page is attached at **Exhibit AJW21**.

8.4.2 Fossil Free London has carried out a number of protests in the period since the 2025 Review Hearing, as evidenced by the Chronology.

8.5 Youth Demand

8.5.1 Youth Demand is the junior branch of JSO (formerly known as Youth Climate Swarm). I note that their website, like JSO’s website, directs visitors to Take Back Power’s website. A printout, taken by my colleague Meghan Clifford on 3 June 2026, from Youth Demand’s website is exhibited at **Exhibit AJW22**.

8.6 Whilst the JSO announcement in March 2025 and the apparent lack of protest action directly attributable to this group since the 2025 Review Hearing may indicate that the JSO campaign is no longer active, it appears, from the evidence above, that its members have very likely migrated to Take Back Power or other organisations.

8.7 Though the names and tactics may change and evolve over time, possibly in an attempt to exploit potential loopholes in unlawful protest injunction orders, for a number of the activists the primary objective remains disruptive demonstrations against organisations that they believe stand opposed to their demands, which includes those perceived to be facilitating and/or supporting the fossil fuel industry. That this is the case is demonstrated, in my view, by the evidenced links between Just Stop Oil, Extinction Rebellion and Youth Demand with Take Back Power and the involvement of members of these groups with it. Consequently, there remains a continued risk to the Claimants’ airports that they will be the target of direct action in the absence of the protection afforded by the injunctions.

9. **OTHER AIRPORT INJUNCTION PROCEEDINGS**

9.1 I am aware from checking their respective publicly accessible websites that the injunctions granted in 2024 in respect of those airports not covered by the Claims, referred to at paragraph 2.2.2 above, were continued at their first annual review hearing in 2025 - respectively:

	Airport(s)	Action Number	Judge / Date of Order
3	Heathrow Airport	KB-2024-002210	Mr Justice Turner 23 July 2025
5	Gatwick Airport	KB-2024-002336	Mr Duncan Atkinson KC (Sitting as a Deputy Judge in the High Court) 18 July 2025
7	Southend Airport	KB-2024-002596	His Honour Judge Freedman (Sitting as a Judge of the High Court) 22 October 2025

9.2 I am aware, from reviewing its publicly accessible website, that the second annual review hearing of the injunction granted in respect of Southend Airport and Heathrow Airport have been listed to be heard on 2 July 2026 and 9 July 2026 respectively. I do not know what the position is in respect of Gatwick Airport.

10. **WIDER INJUNCTION PROCEEDINGS**

10.1 I am aware from this firm’s involvement in the matters or from checking the relevant publicly accessible websites of the following injunctions that have been granted more broadly to protect against the threat of unlawful environmental based protests:

Claim Number	Property	Claimant(s)	Duration of Injunction
QB-2022-001259	Shell Centre Tower	Shell International Petroleum Company Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review. At the most recent review hearing on 17 October 2025 the Court continued the injunction.
QB-2022-001241	Shell Haven Site	Shell UK Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review. At the most recent review hearing on 17 October 2025 the Court continued the injunction.
QB-2022-001420	Petrol filling stations	Shell UK Oil Products Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review. At the most recent review hearing on 17 October 2025 the Court continued the injunction.
PT-2022-000303	Buncefield Oil Terminal and the Kingsbury Oil Terminal	United Kingdom Oil Pipelines Limited and West London Pipeline and Storage Limited	Final injunction granted until 20 October 2028 subject to annual review. At the most recent review hearing on 13 November 2025 the Court continued the injunction.
QB-2022-000904	Pembroke oil refinery and jetties, Manchester oil terminal, Kingsbury oil terminal, Plymouth oil terminal, Cardiff terminal, Avonmouth terminal and Pembrokeshire terminal	Valero Energy Ltd, Valero Logistics UK Ltd and Valero Pembrokeshire Oil Terminal Ltd	Final injunction granted until 13 December 2028 or further order in the meantime following a hearing on 17 January 2024. At the most recent review hearing on 16 February 2026, the Court continued the injunction.

QB-2022-001098	Fawley Complex, Hythe Terminal, Avonmouth Terminal, Birmingham Terminal, Purfleet Terminal, West London Terminal, Hartland Park Logistics Hub and Alton compound at Holybourne	Esso Petroleum Company Limited and Exxonmobil Chemical Limited	Final injunction granted on 29 January 2024 until 11 July 2028 subject to annual review on 18 July of each year. At the most recent review hearing on 9 July 2025 the Court continued the injunction. A further review hearing has been listed to be heard on 22 July 2026.
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11. **DETERRENT EFFECT OF THE INJUNCTION**

11.1 The Claimants continue to have no objection to protests which are lawful and do not interfere with others’ rights subject to those wishing to carry out a peaceful protest at the airports, making a request for the Claimants to designate an area for that purpose in accordance with the final recital in the 2024 Order. In asking the Court to continue the injunction granted by the 2024 Order, the Claimants seek only to restrain direct/unlawful protest activity that goes beyond that which is peaceful and lawful and causes disruption to those seeking to go about their lawful business at London City Airport.

11.2 Noting the continued lack of direct/unlawful protest activity at London City Airport, alongside the incidents referred to within the Chronology, the Claimants infer that the protestors involved in these incidents (or some of them at least) have been careful to ensure that their unlawful behaviour has taken place at premises which are not protected by injunction so that they are not at risk of proceedings for contempt of court. I would also draw attention to:

11.2.1 the following comments of Swift J in his judgment in *Exolum Pipeline System Limited & Others v Persons Unknown & Another* [2025] EWHC 1913 (KB) at [14]:

“14. The continuation of the Order made by Bennathan J has become necessary as orders of this type have themselves become features of what appear to be contests of attrition between activist organisations, such as Just Stop Oil, and any event or operation that those activists consider will, if disrupted, obtain publicity for and advance their cause. The attacks that Just Stop Oil undertakes are essentially opportunistic. As one or other target is made less accessible by orders such as the one now under consideration, activists will turn their attention somewhere else. The application to continue the Order made in 2022 rests on the premise that were this order to be discharged these terminals would once again be targeted and, having previously been the subject of an injunction, those terminals would be all the more an attractive target. Experience shows that such pessimism is warranted. 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”.

11.2.2 paragraphs 20 and 31-32 of the First S Wortley Statement:

20 *“The fact that the protest on 27.07.24 was relocated from London City Airport to the Department of Transport and the fact that the JSO and Fossil Free London protestors conducted their protest from outside the red line of the injunction plan demonstrate that the injunction granted by Mr Justice Julian Knowles in that case on 20.06.24 served its purpose. In both instances peaceful protests went ahead but without causing unlawful interference to users of London City Airport”*

31 "On 21.05.25, the Metropolitan Police sent an email to the security team at London City Airport which included the following:-

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

32 "I believe the reference to "... the Shell protest ..." relates to the Annual General Meeting of Shell plc held at the Soffitel Hotel at Heathrow Terminal 5 on 20.05.25. The Metropolitan Police told London City Airport's security team that a protest by environmental protest groups:-

"were forced to hold their protest at the Shell head office in central London rather than the AGM location at a hotel within the Heathrow Airport injunctioned area, in order to avoid the risk of associated penalties for breaching of the injunction."

11.3 The deterrent effect of injunction orders, such as those granted in these proceedings, is further evidenced I would respectfully suggest by the apparent willingness of those engaged in unlawful direct protest action to 'take their chances' of not being convicted in any subsequent criminal proceedings arising from such action where there is no protective injunction order in place. Whilst I acknowledge that criminal convictions do sometimes follow in such circumstances there are many instances of that not being the case – by way of example, I am aware that:

11.3.1 the jury at the initial trial of two JSO activists in January 2025, who sprayed departure boards at Heathrow Airport with orange paint in July 2024, failed to reach a majority decision. They were subsequently found guilty of criminal damage at a retrial in June 2026; and

11.3.2 three JSO activists were found not guilty of causing a public nuisance in October 2025 by a jury for spraying Stonehenge with orange powder in 2024;

11.3.3 three JSO activists were found not guilty of causing a public nuisance in September 2025 after climbing gantries on the M25 in 2022;

11.3.4 eight JSO activists were found not guilty of intentionally or recklessly causing a public nuisance in August 2025 after blocking entrances to petrol stations in August 2022;

11.3.5 the jury at the initial trial of a JSO supporter in July 2025, who climbed a gantry on the M25 in November 2022, failed to reach a majority decision; and

11.3.6 five Palestine Action activists were cleared in February 2026 of aggravated burglary after Elbit Systems' (a UK subsidiary of an Israeli defence firm) was targeted on 6 August 2024. They were also charged with criminal damage and violent disorder but the jury reached partial or no verdicts on those counts. Four of the activists were subsequently found guilty of criminal damage at a retrial in May 2026.

Copies of news articles reporting on the above are exhibited at **Exhibit AJW23**.

12. **RESPONSE TO THE CLAIMS**

12.1 I can confirm that no acknowledgment of service, admission or defence has been received on behalf of the Defendants and that nobody has ever engaged with these proceedings.

12.2 I am informed by Claire Hortop, Head of Legal at London City Airport that the Claimants are not aware of the identity of any individuals who threaten to engage in direct/unlawful protest activity at London City Airport.

13. **FULL AND FRANK DISCLOSURE**

13.1 The Claimants are aware and mindful of their continuing duty to provide full and frank disclosure to the Court and consider that this duty has been complied with via the provision of this witness statement.

13.2 In accordance with that duty, I make reference to an incident at London Southend Airport on 8 June 2026, on which the text of a briefing note reporting on such incident, which was shared with Claire Acklam (Senior Legal Counsel of Leeds Bradford Airport) by Southend Airport's Head of Security, is exhibited at **Exhibit AJW24**. The briefing note states:

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

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

Once through security, a number of students appeared from the rest rooms with bright orange t shirts on (the same colour orange as JSO). The T shirts had writing on which read 'Malta Hockey tour 2026'. At the same time, small groups started to position themselves all around the terminal, at or near to exit doors to the apron. The booking was confirmed as being made by 1 person, who had booked 24 flights a month ago, and the other 24 a week before departure . In the 24 hrs prior to departure, there were also another 50 people booked on the Malta flight, which easyJet stated was unusual activity for this route. Police were called and they positioned around the terminal. Other flights were boarded with Police at the gates to clear the terminal down, leaving only the Malta flight passengers.

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

When the Police had enough resources, airport staff spoke to the organisers. The student group did not say they had any association with the older people. The main group of 48 students were taken back to CSA and conversations had with them. This did not ascertain much information, as all appeared to say exactly the same, however stories varied a lot as to where they were staying in Malta. All students had their bags searched (with their own consent) and nothing further was found. This was done in the presence of Police. Once cleared they were allowed to fly. It was noticed by airport security staff that a lot of the clothing in the bags appeared old and the toiletries were mainly half used items and cheap non branded perfumes

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

13.3 Quite what the aims/motivations of those involved were is unclear from the above briefing note, but it does reinforce in my view the comments made above at paragraph 6 on the risks and harm presented by direct/unlawful protest activity at the airports and how, especially given the currently heightened terrorism threat level in the UK, protest at airports could be

interpreted by airport security services as a possible terror threat – necessitating the need for energy and resources to be diverted in order to address it.

14. **CONCLUSION**

- 14.1 I am informed by Claire Hortop, Head of Legal at London City Airport that the Claimants' Executive Committee have concluded that they should respectfully request the Court to order that the injunction remains in full force and effect, subject to a review in 12 months' time as provided by the 2024 Order. I understand that this decision was reached after having considered carefully whether the threat of unlawful action has abated materially and having formed the view that it has not abated for the purposes of this year's review hearing given the evidence set out above, and in particular, the elevated terrorism threat level. If the injunction is continued in full force and effect, subject to a review in 12 months' time, the Claimants will reassess matters afresh next year.
- 14.2 The impact of climate change continues to be firmly on the public agenda, continues to attract strong feelings and is still a subject about which campaigners are willing to contemplate disruptive action. The inference drawn by the Claimants (and by me) is that the injunctions granted over time have influenced the pattern of protest, with disruptive action being focused principally on targets which do not have the benefit of the Court's protection by way of injunction. The Claimants therefore remain very concerned that protest groups, including but not limited to those referred to in this witness statement, will undertake disruptive direct action by way of trespass at London City Airport and/or causing a private or public nuisance on or around them if the injunction were now to be lifted.
- 14.3 As is clear from the evidence, any such disruptive direct action would cause significant harm. There would be an impact on the Claimants' operations, the operations of the airlines and businesses operating from them, the travelling public as well as the associated financial impact for all concerned.
- 14.4 The Claimants consider that the injunction has had a deterrent effect and prevent the irreparable and serious potential harm that might be caused should the Defendants undertake any direct/unlawful protest activity in or around London City Airport. It is for this reason that they seek the injunction remain in full force.
- 14.5 The risks are especially acute at this time of year: most of the incidents in which UK airports were targeted by environmental protestors in 2024 occurred between late June and August 2024 - the busiest period for holiday travel.

15. **NOTICE OF THE REVIEW HEARING**

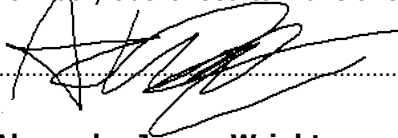
- 15.1 The Claimants intend to give notice of the review hearing in the manner provided for in paragraph 10 of the 2024 Order – namely by:
- 15.1.1 Uploading a copy of the application dated 2 June 2026, the draft Order, a copy of this witness statement and exhibits and details of the review hearing to each of the injunction websites;
- 15.1.2 sending copies of the documents referred to in the previous paragraph to the email addresses referred to in Schedule 3 to the 2024 Order plus the following additional email addresses:
- 15.1.2.1 info@takebackpower.net and press@takebackpower.net which are understood to be linked to Take Back Power;
- 15.1.2.2 shut_the_system_info@proton.me, which is understood to be linked to Shut the System;
- 15.1.2.3 campaigner@fossilfreelondon.org and operations@fossilfreelondon.org which are understood to be linked to Fossil Free London; and

15.1.2.4 YouthDemandPress@protonmail.com and youthdemand@proton.me, which are understood to be linked to Youth Demand.

15.1.3 affixing a notice at each of the warning notice locations at London City Airport referring to the time and date of the review hearing and explaining where copies of the additional papers can be found and obtained in hard copy.

I believe that the facts stated in this Witness Statement and Exhibits 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.

I am duly authorised to make this statement on behalf of the Claimants.



.....

Alexander James Wright

Legal Director, Eversheds Sutherland (International) LLP

11 June 2026

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW1

This is the exhibit marked "AJW1" in the witness statement of Alexander James Wright.

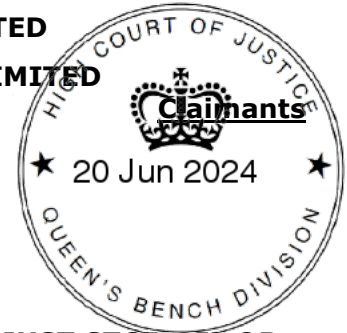
IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION

CLAIM NO: KB-2024-001765

Before Mr Justice Julian Knowles
On 20 June 2024

BETWEEN:-

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



- v -

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

Defendant

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimants' claim by Claim Form, dated 12 June 2024

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

AND UPON hearing Counsel for the Claimants

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

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

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

IT IS ORDERED THAT:

INJUNCTION

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

VARIATION

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

SERVICE AND NOTIFICATION

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

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

FURTHER DIRECTIONS

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

COMMUNICATIONS WITH THE CLAIMANT

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

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

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

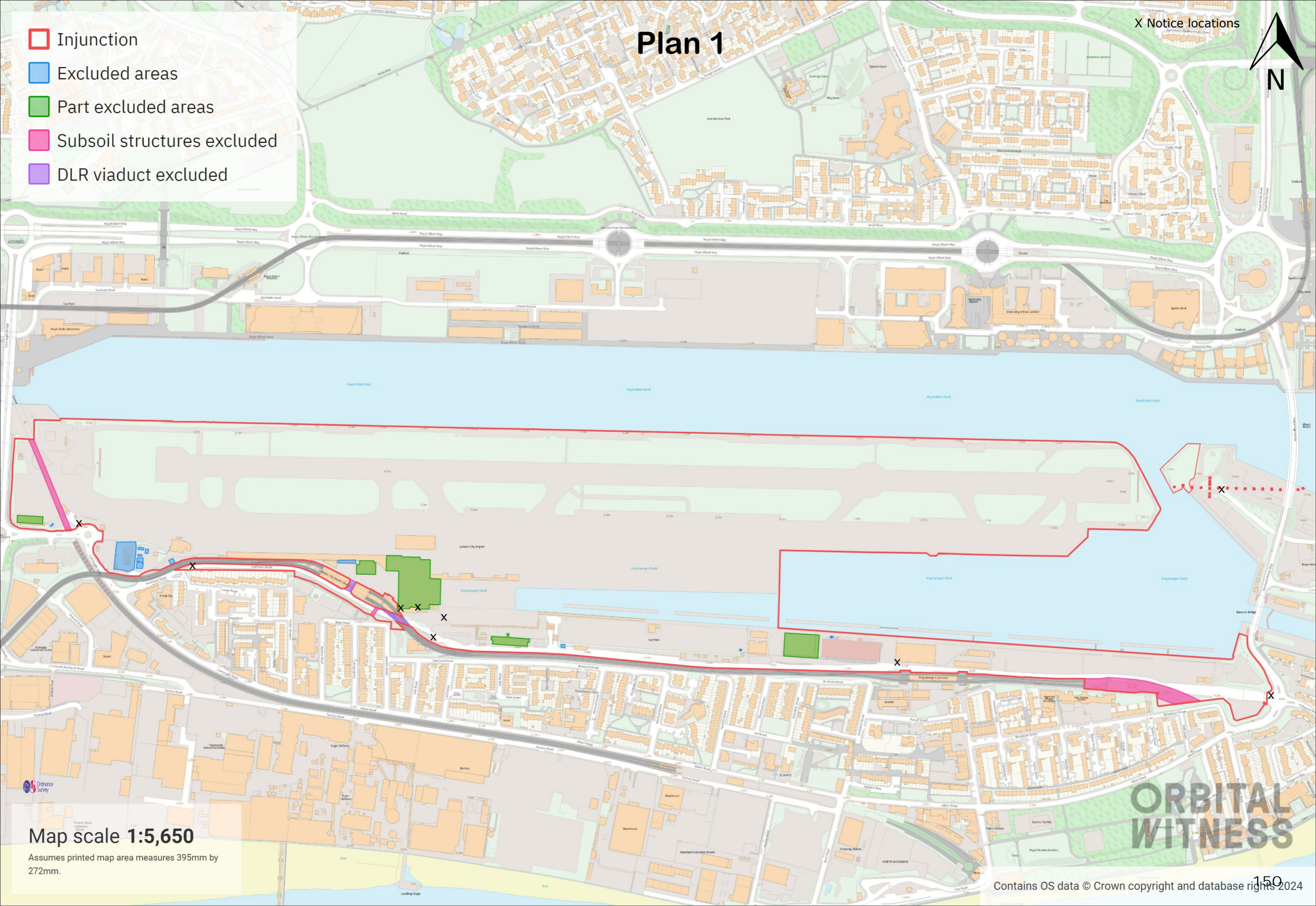
Dated: 20 June 2024

SCHEDULE 1 - PLANS

- Injunction
- Excluded areas
- Part excluded areas
- Subsoil structures excluded
- DLR viaduct excluded

Plan 1

X Notice locations



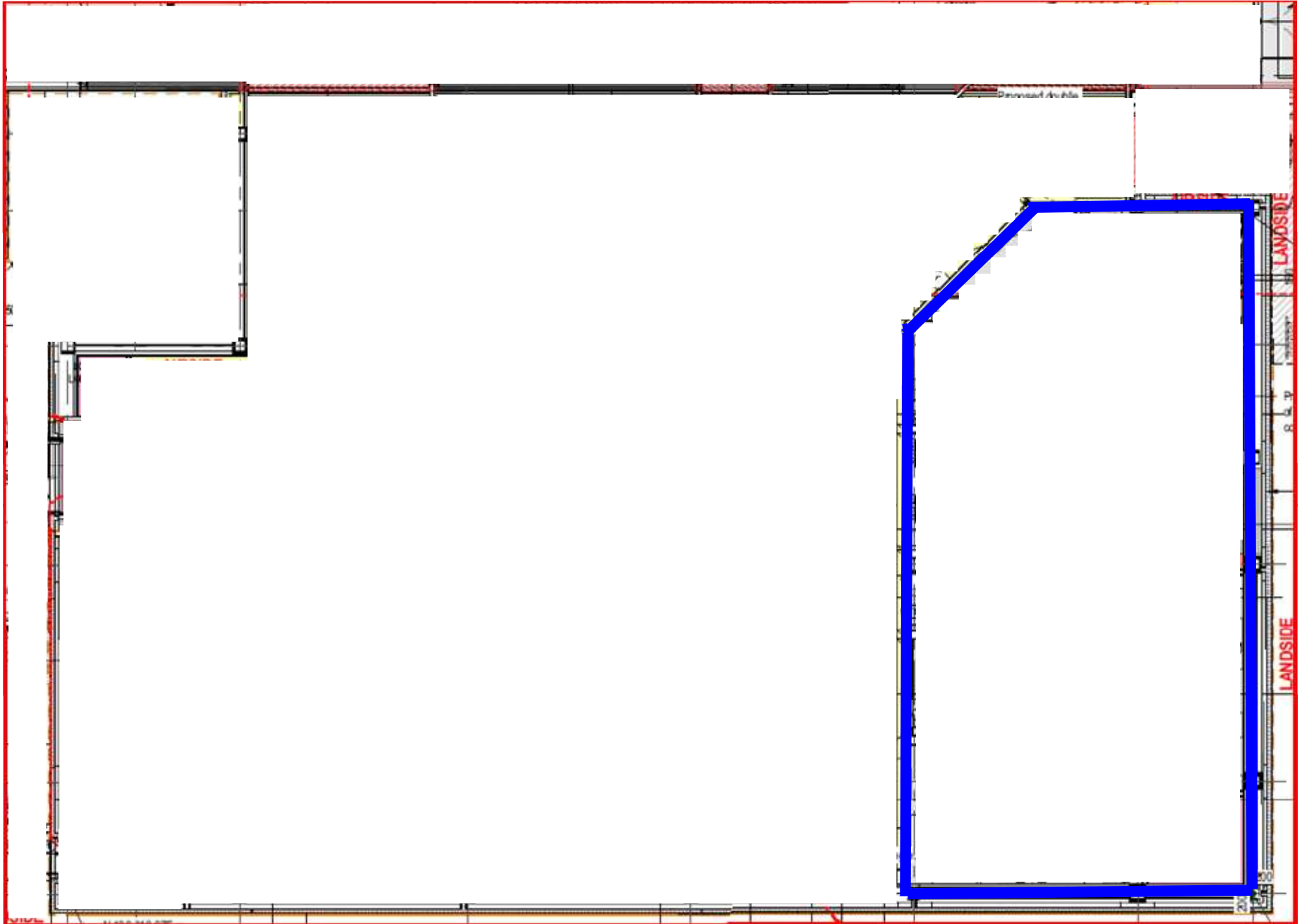
 Ordnance Survey
Map scale 1:5,650
 Assumes printed map area measures 395mm by 272mm.

**ORBITAL
WITNESS**



r r r d r

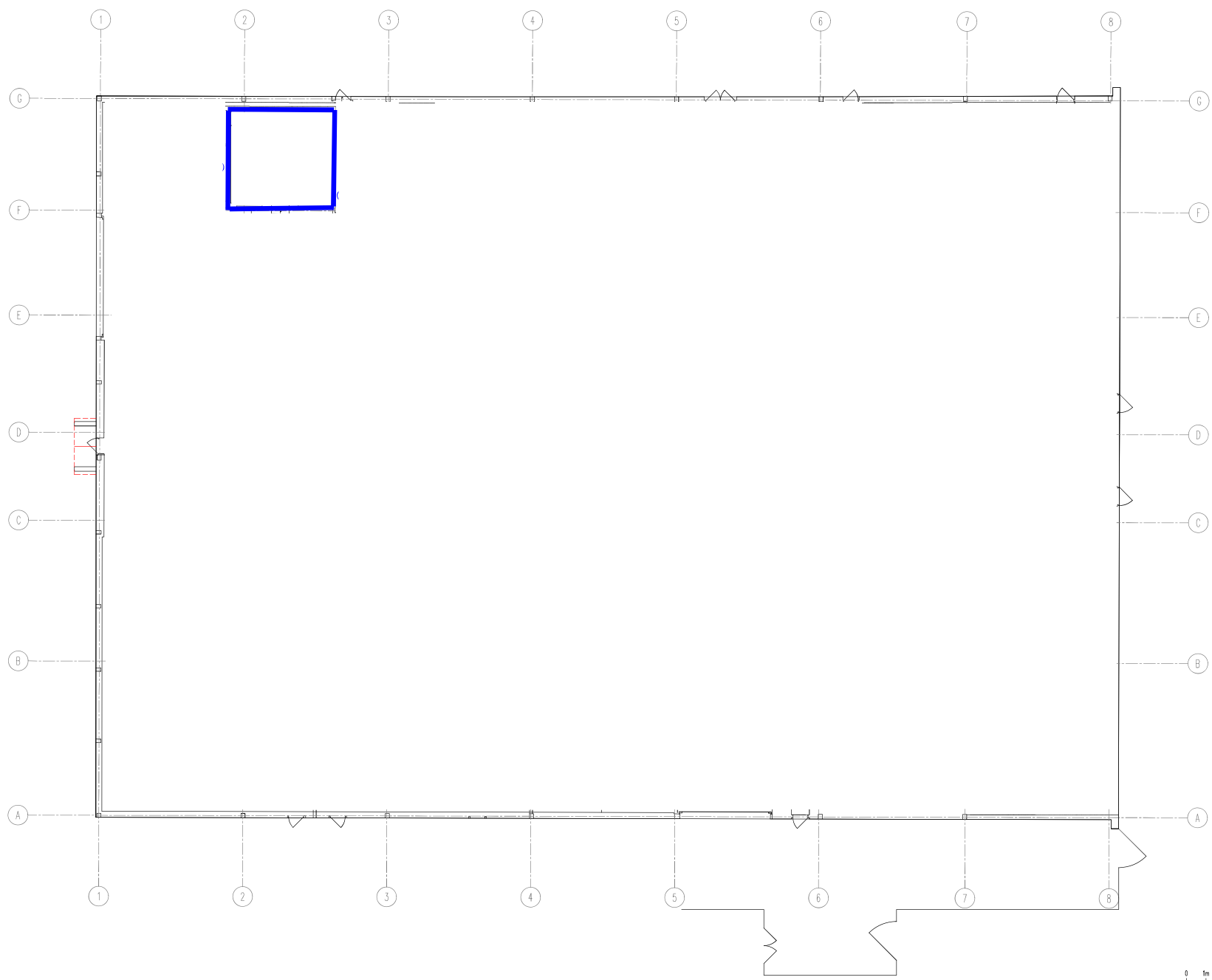
Plan 3



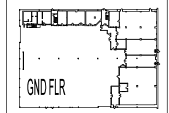
d r d r

Plan 5

General Notes:



B Room Numbers Added	01/11/16
A Door Numbers Added	01/03/16



London City Airport, City Aviation House
Royal Docks, London, E16 2PB
RECORD DRAWING

BLUE SHED
Ground Floor
General Arrangement Plan



SCALE BAR 1:100 @ A1

04/08/15	VR	20/11	0001
15/09/16	VR	20/11	0001
15/09/16	VR	20/11	0001
15/09/16	VR	20/11	0001

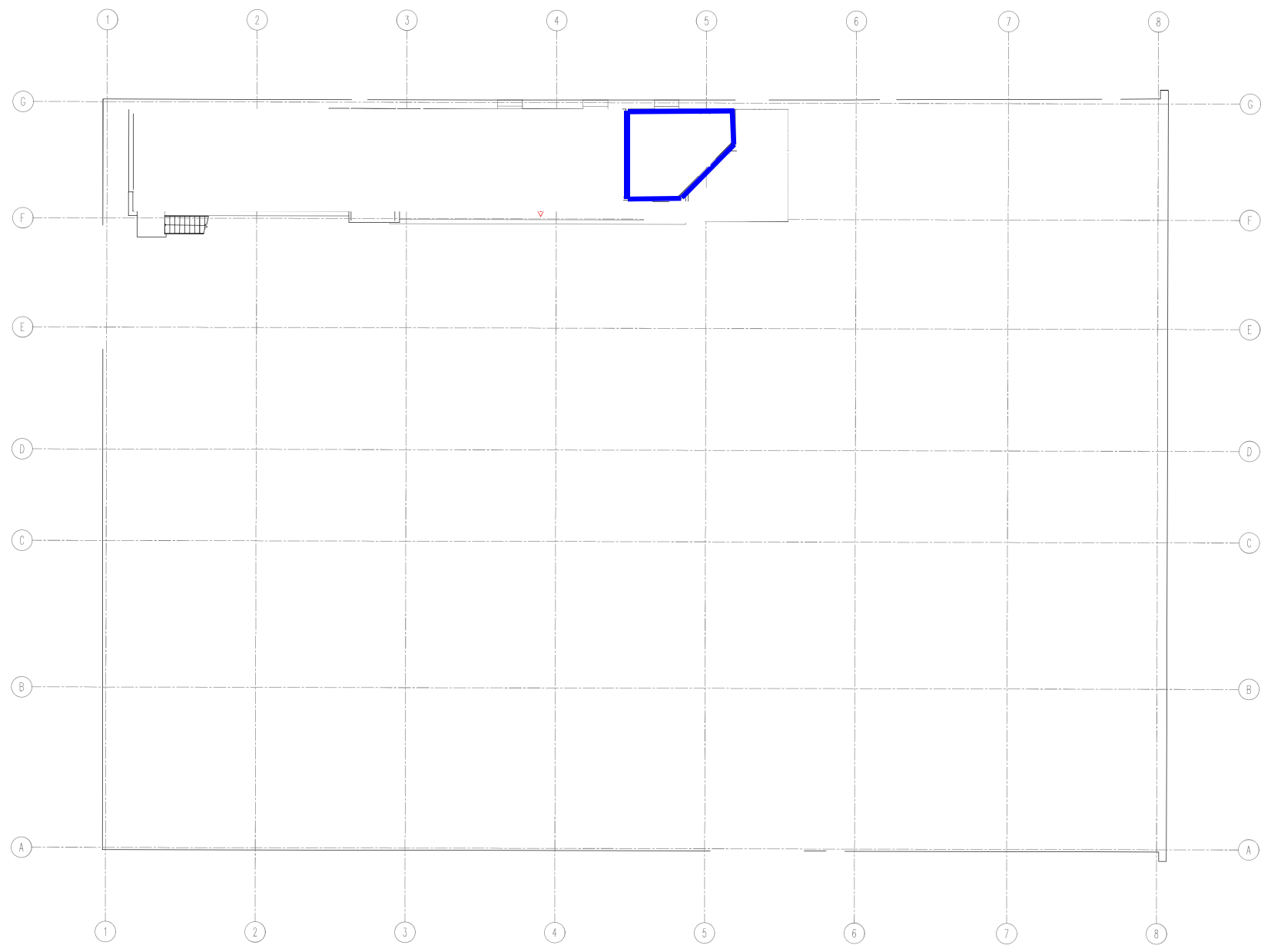
Blue Shed - r Floor

Plan 6

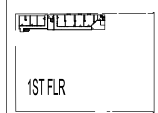
General Notes:

LEGEND

-  FIRE DOOR
-  STANDARD DOOR



B	Room Numbers Added	01/17/16
A	Door Numbers Added	01/03/16



London City Airport
Get closer.
London City Airport, City Aviation House
Royal Docks, London, E16 2PB

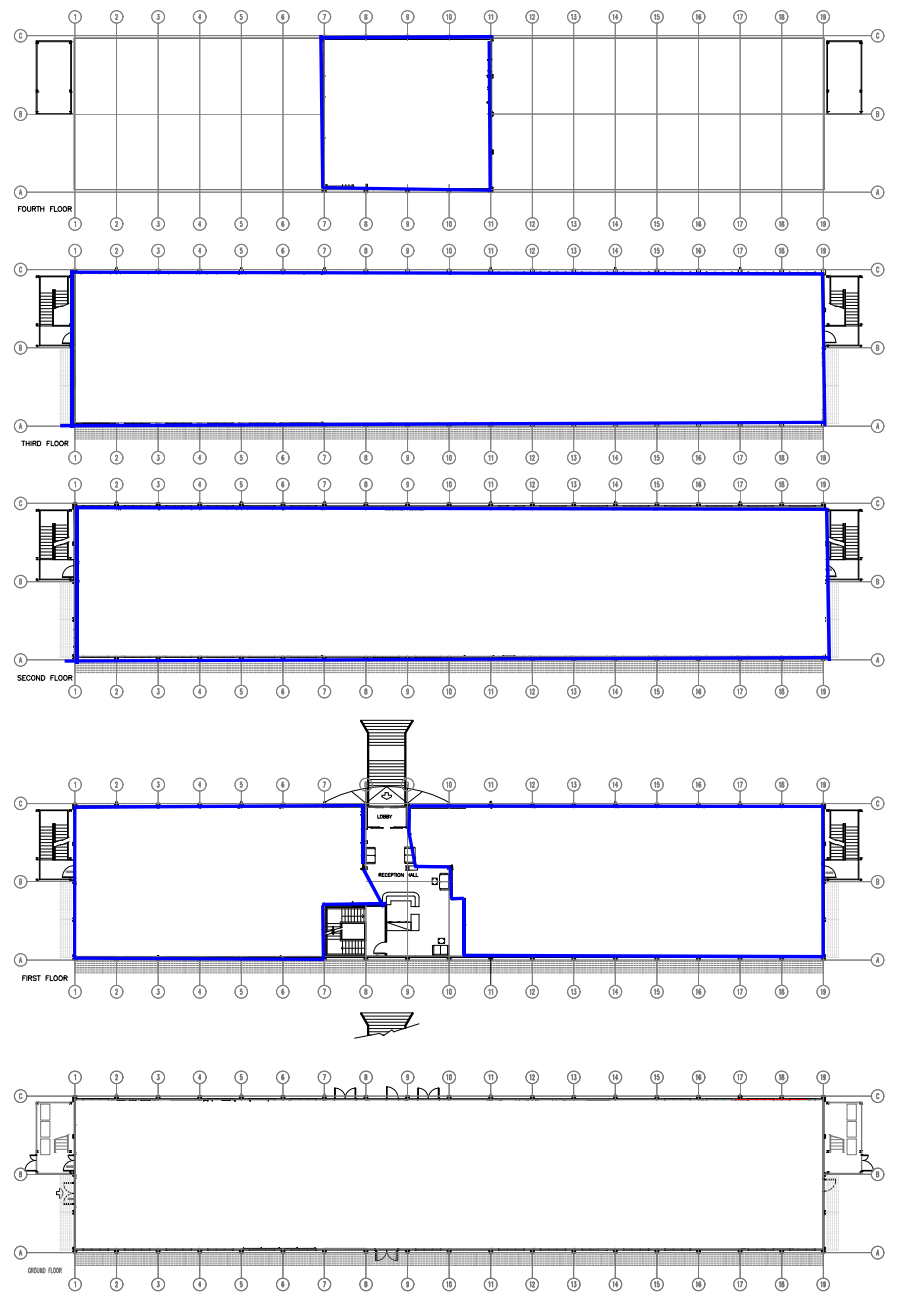
RECORD DRAWING

BLUE SHED			
Sheet 06			
First Floor			
General Arrangement			
04/08/15	VR	155	1:100
155	01	B	1:100



City Aviation House

Plan



0 1/4" = 1'-0" 1/2" = 2'-0" 3/4" = 3'-0" 1" = 4'-0"
SCALE: ARCH. 1/16" = 1'-0"

<p>PROJECT: CITY AVIATION HOUSE SHEET: 01-100 DATE: 01/15/10 DRAWN BY: RICHARD A. ADRIANO CHECKED BY: [Signature]</p>	<p>OWNER: LANSLOW CITY AIRPORT ARCHITECT: RICHARD A. ADRIANO 10000 S. STATE ST., SUITE 100 DENVER, CO 80231 TEL: 303.733.1111 FAX: 303.733.1112 WWW: RICHARDADRIANO.COM</p>	<p>RECORD DRAWING CITY AVIATION HSE RICHARD A. ADRIANO</p>	<p>DATE: 01/15/10 SCALE: ARCH. 1/16" = 1'-0"</p>	<p>1. TOTAL NUMBER OF SHEETS: 100 2. SHEET NUMBER: 01-100 3. SHEET TITLE: CITY AVIATION HSE 4. SHEET SCALE: ARCH. 1/16" = 1'-0"</p>
---	---	--	---	--

SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS

- (1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.

- (2) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW2

This is the exhibit marked "AJW2" in the witness statement of Alexander James Wright.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR JUSTICE BOURNE

ON: 24 June 2025

B E T W E E N : -

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

-and-



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

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

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

AND UPON the Claimants’ application dated 2 June 2025

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

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

AND UPON reading the application and the witness evidence in support

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

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

IT IS ORDERED that:

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

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

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

CLAIM NO: KB-2024-001765

Before Mr Justice Julian Knowles
On 20 June 2024

BETWEEN:-

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

Claimants

- v -

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

Defendant

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

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UPON the Claimants' claim by Claim Form, dated 12 June 2024

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

AND UPON hearing Counsel for the Claimants

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

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

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

IT IS ORDERED THAT: INJUNCTION

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

VARIATION

2

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

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

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

SERVICE AND NOTIFICATION

7. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and Note of the Hearing on 20 June 2024 will be notified to Persons Unknown by the Claimants carrying out each of the following steps:
 - a. Uploading a copy onto the following website:
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>
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 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
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11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(a)-(b) only.
12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8(c), 9(c)-(d) and 10(c), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

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

COMMUNICATIONS WITH THE CLAIMANT

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

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

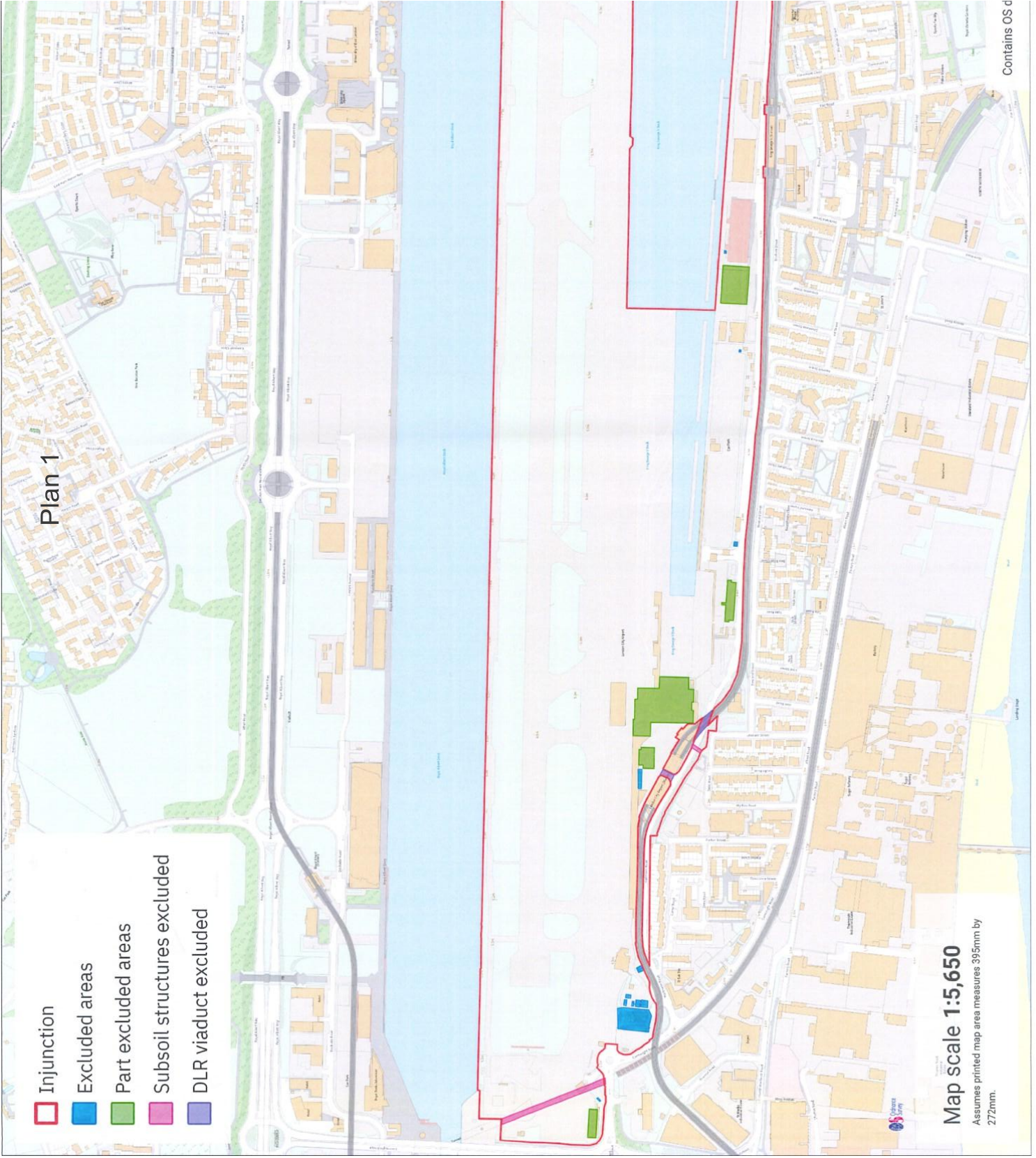
(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

Dated: 20 June 2024

SCHEDULE 1 - PLANS

- Injunction
- Excluded areas
- Part excluded areas
- Subsoil structures excluded
- DLR viaduct excluded

Plan 1

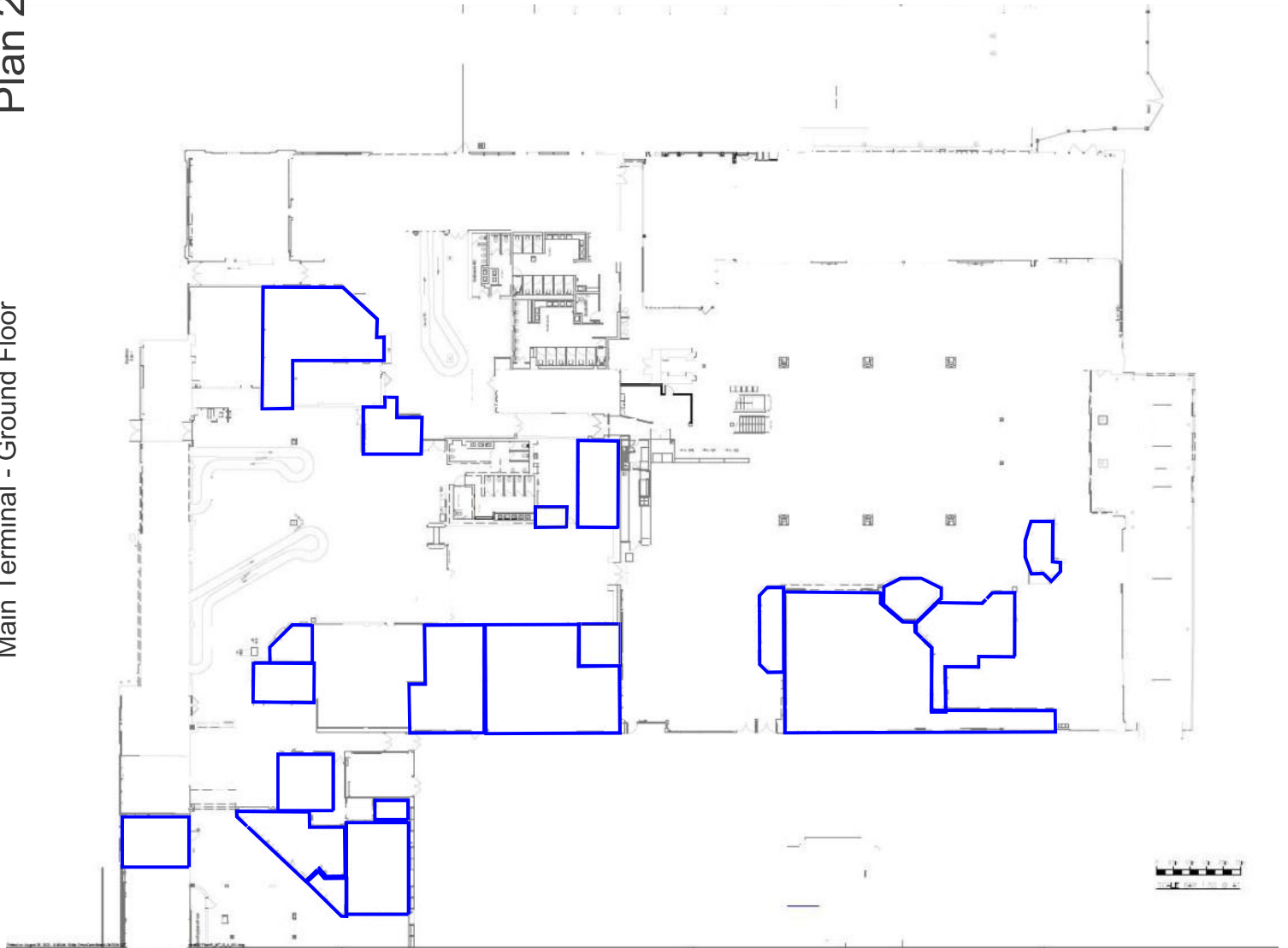


Map scale 1:5,650

Assumes printed map area measures 395mm by 272mm.

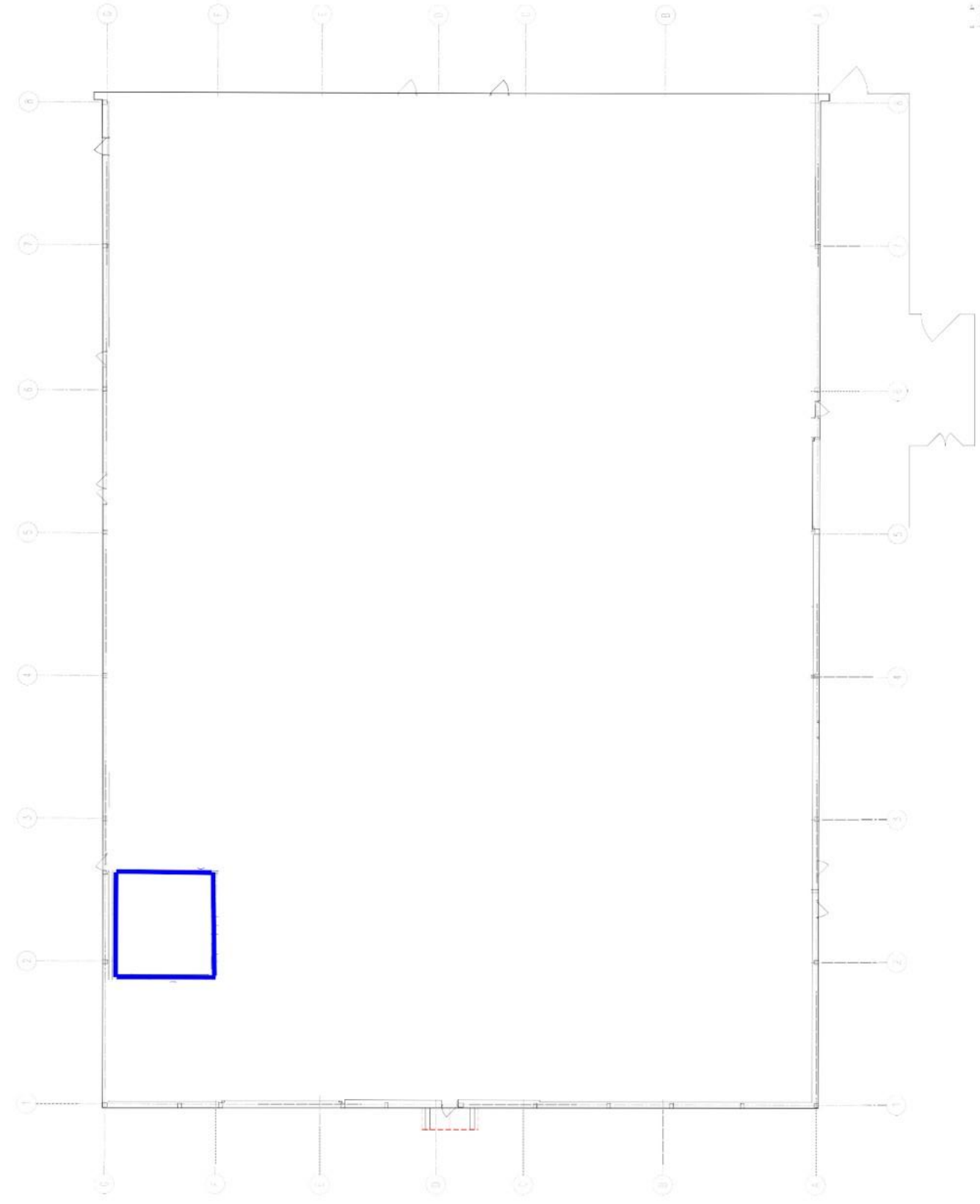
Plan 2

Main Terminal - Ground Floor

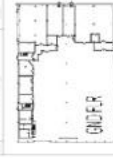


Plan 5

Blue Shed - Ground Floor



B	Blue Shed Shed	2/10/08
A	Blue Shed Shed	2/10/08



Drawn by: [Name]
 Checked by: [Name]
 Date: [Date]

RECORD DRAWING

BLUE SHED

R/BS/G/A/001

LUGGING
 XXXX FIRE DOOR
 XXXX STANDARD DOOR

1	Issue Number	01/2017
2	Date	13/10/16

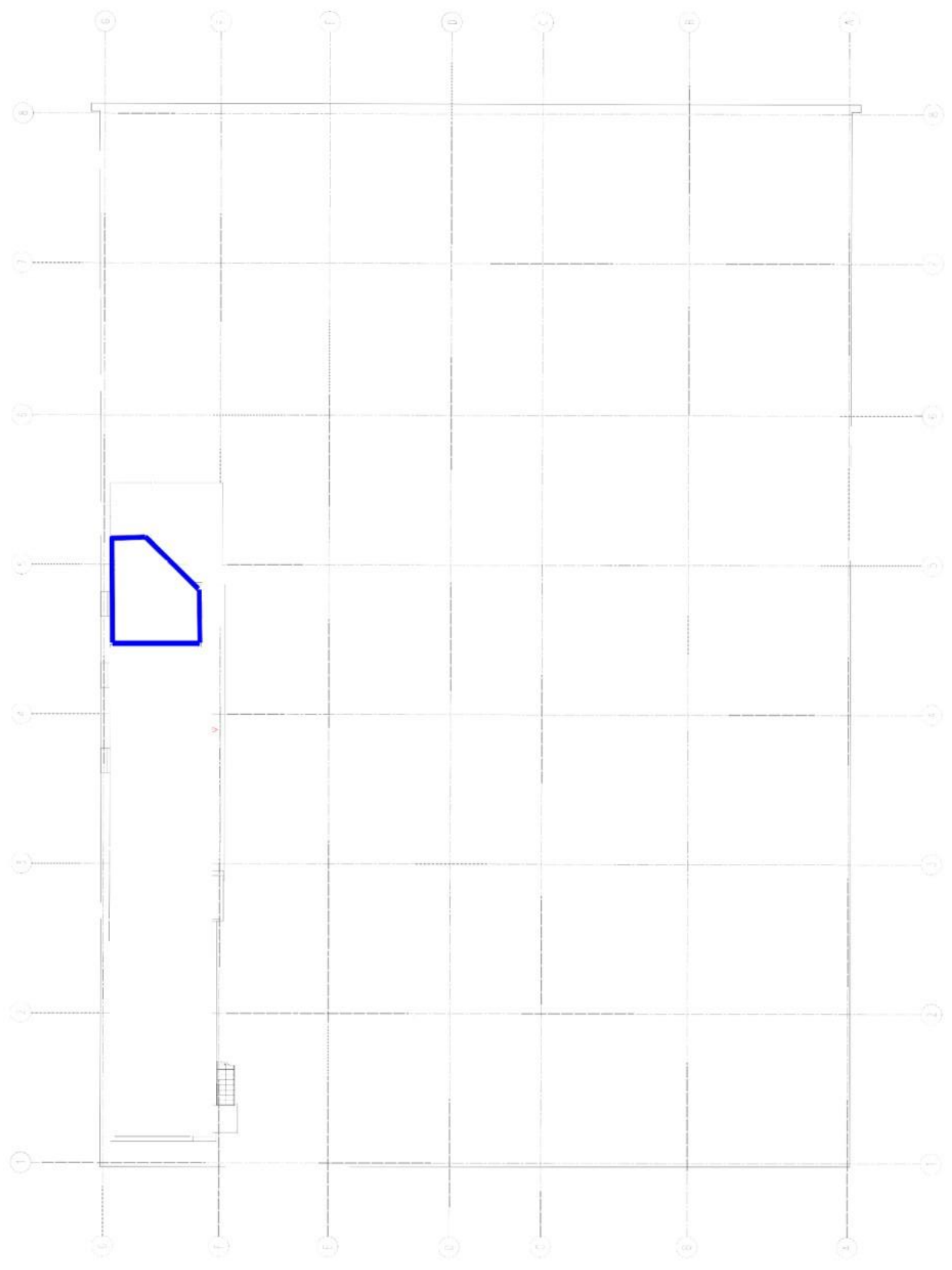


London City Airport
 GBC CLASS 2
 100000 sq ft
 100000 sq ft
 RECORD DRAWING

BLUE SHED
 R/BS/1/A/001

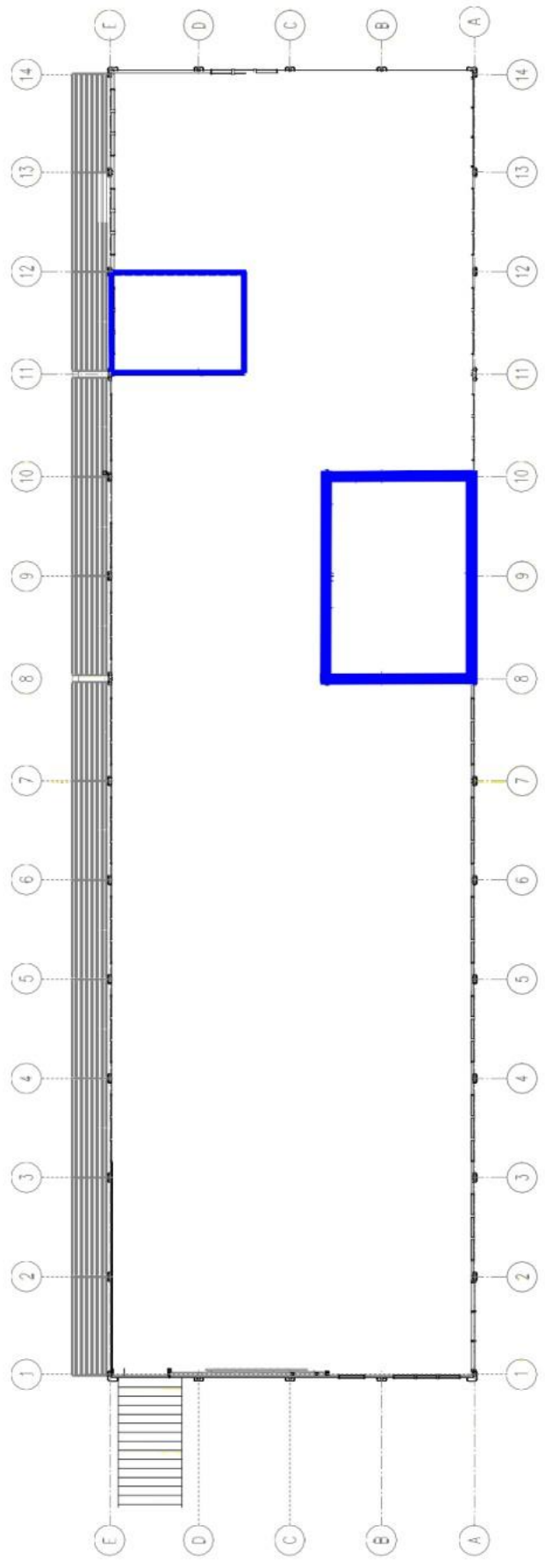
Plan 6

Blue Shed - First Floor

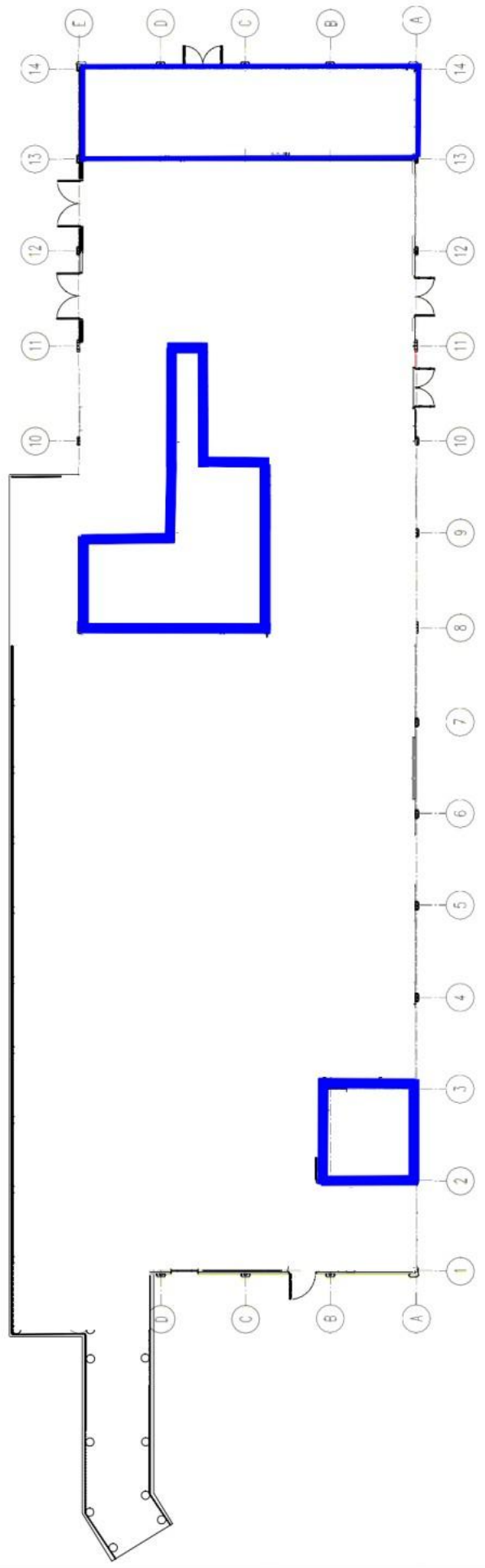


Plan 7

Jet Centre - Ground Floor



Jet Centre - First Floor



LEGEND

	Fire Door
	Standard Door

1	Issue No.	1
2	Issue Date	15/03/2011
3	Issue By	[Name]
4	Issue For	[Name]
5	Issue Reason	[Reason]
6	Issue Status	[Status]

6-REV

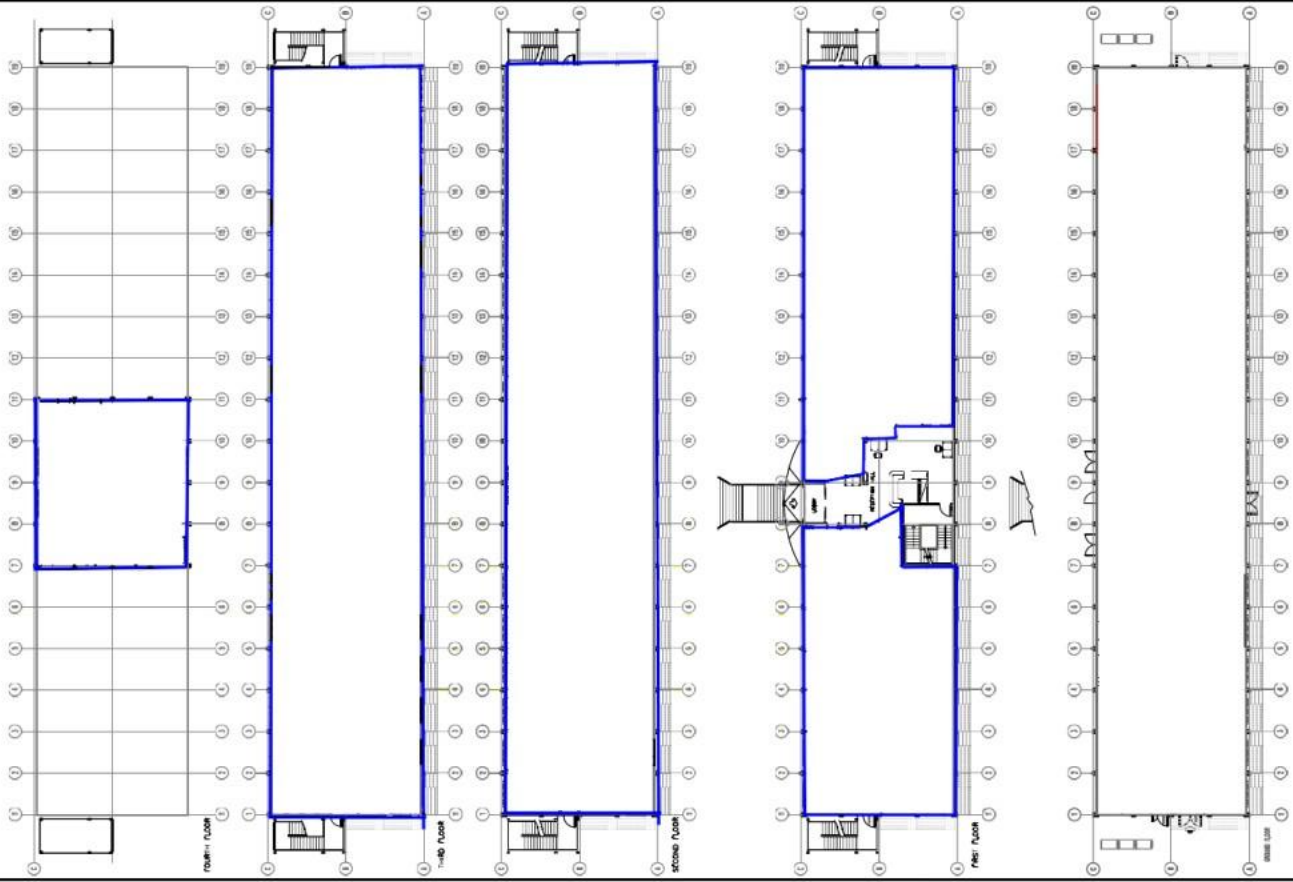
London City Airport
Jet Centre
RECORD DRAWING

JET CENTRE
RUC/A/A001

SCALE: 1:100
1 2 3 4 5 6 7 8 9 10 11 12 13 14

Plan 8

City Aviation House



1 1/4" 1/4" 1/4" 1/4" 1/4"
 1/4" 1/4" 1/4" 1/4" 1/4"
 SCALE BAR 1:150 @ A1

1. Issue number - 01	1/1/19
2. Issue number - 02	1/1/19
3. Issue number - 03	1/1/19
4. Issue number - 04	1/1/19

04/19

LONDON CITY AIRPORT

RECORD DRAWING

CITY AVIATION HSE

R CAH/A/A01

SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS

- (1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.

- (2) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW3

This is the exhibit marked "AJW3" in the witness statement of Alexander James Wright.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Royal Courts of Justice
Strand
London, WC2A 2LL

Wednesday, 26th August 2025

BEFORE:

MR JUSTICE BOURNE

BETWEEN:

LONDON CITY AIRPORT LTD & ORS

Claimants

- and -

PERSONS UNKNOWN

Defendants

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

JUDGMENT

(Approved)

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

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

7. I shall note increase the length of this judgment or extend the corpus of judicial discussions of this broad subject by repeating the statements of legal principle and factual considerations, which were set out by the judges when granting the injunctions last year.
8. It is, in particular, unnecessary for me to explore some distinctive characteristics of these cases which were considered by the judges, notably the fact that the claims concern a combination of (1) land owned by the claimants, (2) land not owned by the claimants but on which there is airport infrastructure and (3) public highways in and around the airports. The injunction granted to London City Airport covers land in category (1) only, whereas the injunctions in the other three cases cover all three categories. The claimants are not seeking any geographical expansion of the injunctions granted last year. London City Airport seeks, and I will grant, permission to amend to reflect a change of ownership of one specific area.
9. The nature of a review hearing of this kind was considered in *Wolverhampton* at paragraph 225, where the Supreme Court observed that the hearing:

“...will give all parties an opportunity to make full and complete disclosure to the court, supported by appropriate evidence as to how effective the order has been, whether any reasons or grounds for its discharge has emerged, whether there is any proper justification for continuance; and whether and on what basis, a further order ought to be made.”
10. In *High Speed Two (HS2) Ltd & Anor v Persons Unknown* [2024] EWHC 1277 (KB), Richie J described the court’s task at a review hearing:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Lower Ground, 46 Chancery Lane, London WC2A 1JE

Email: civil@epiqglobal.co.uk

This transcript has been approved by the Judge

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW4

This is the exhibit marked "AJW4" in the witness statement of Alexander James Wright.

Injunction

London City Airport Injunction Order

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

On 24 June 2025 the High Court extended the injunction

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

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

Review Hearing on 24.06.25

All Years

[Injunction Order](#)

[Supplemental Hearing Bundle](#)

[Airports - chrono](#)

[Airports - skeleton](#)

[Airport Injunction Renewal](#)

Original Hearing on 20.06.24

All Years

[Injunction Order](#)

[Hearing Bundle](#)

[Skeleton Argument](#)

[Note of Hearing](#)

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -






PERSONS UNKNOWN
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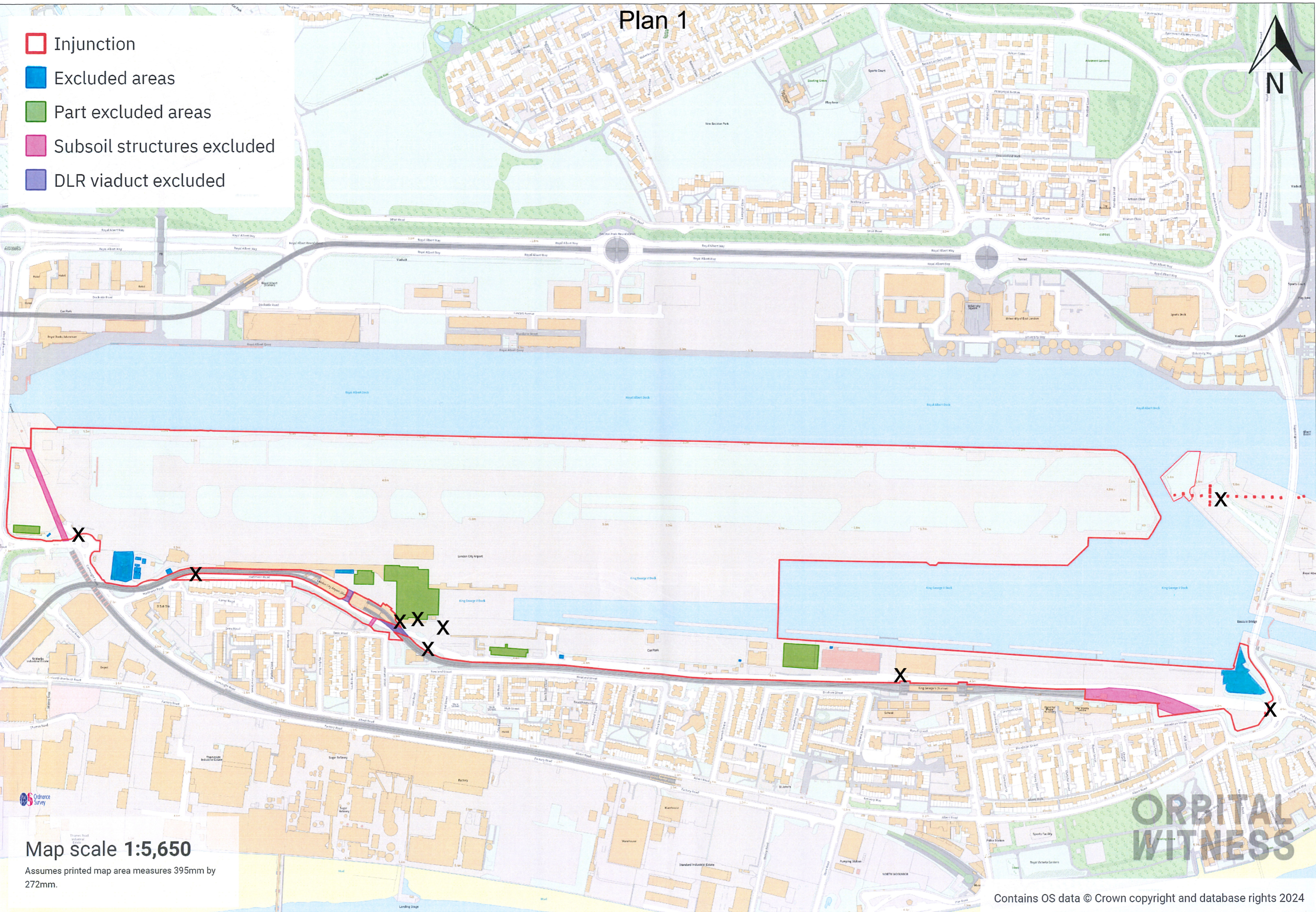
Defendants

AJW5

This is the exhibit marked "AJW5" in the witness statement of Alexander James Wright.

Plan 1

-  Injunction
-  Excluded areas
-  Part excluded areas
-  Subsoil structures excluded
-  DLR viaduct excluded



Map scale 1:5,650

Assumes printed map area measures 395mm by 272mm.

**ORBITAL
WITNESS**

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IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW6

This is the exhibit marked "AJW6" in the witness statement of Alexander James Wright.

Owen, Elin

From: Wright, Alexander
Sent: 09 June 2026 15:58
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com
Subject: London City Airport - Order from 2025 Review Hearing (24 June 2025)
Attachments: London City Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329805.1).pdf

To whom it may concern

We write further to the first review hearing heard by Bourne J on 24 June 2025 (“**the First Review Hearing**”) in respect of the injunction granted in these proceedings by Order dated 20 June 2024 by Mr Justice Julian Knowles.

We attach a copy of the Order of Bourne J from the First Review Hearing by way of service on you.

The precise terms of the order can be viewed from the webpage address referred to in the table below, at which copies of all applicable documents can be viewed also.

Airport	Action Number	Webpage address
London City Airport	KB-2024-1765	Injunction London City Airport

Regards

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M: +44 7500 578 620

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www.eversheds-sutherland.com

Eversheds Sutherland

Helping our clients, our people and our communities to thrive

Owen, Elin

From: Wright, Alexander
Sent: 09 June 2026 16:02
To: enquiries@extinctionrebellion.uk
Subject: London City Airport - Order from 2025 Review Hearing (24 June 2025)
Attachments: London City Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329805.1).pdf

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Regards

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IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -






PERSONS UNKNOWN
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IN THE AMENDED CLAIM FORM

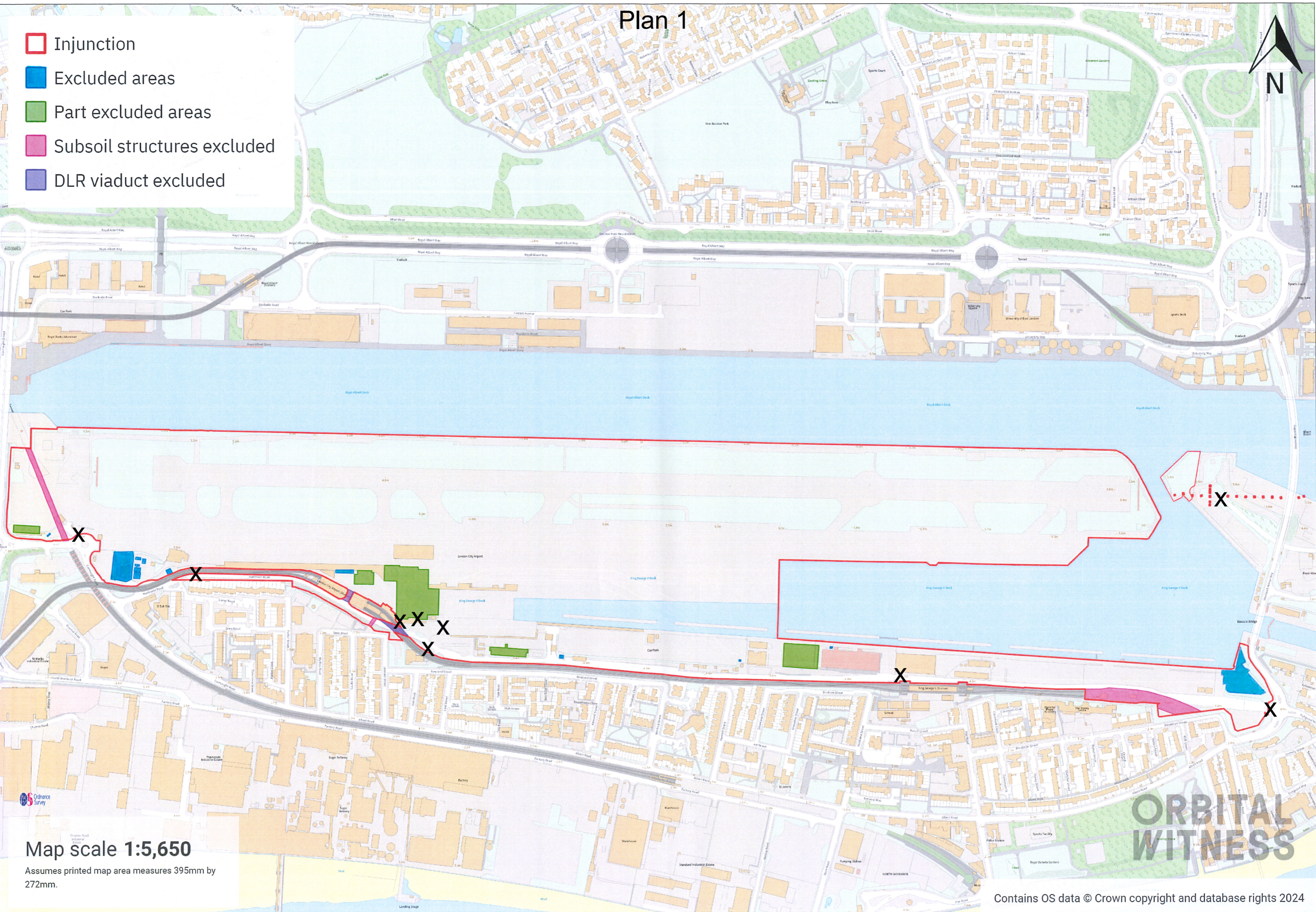
Defendants

AJW7

This is the exhibit marked "AJW7" in the witness statement of Alexander James Wright.

Plan 1

-  Injunction
-  Excluded areas
-  Part excluded areas
-  Subsoil structures excluded
-  DLR viaduct excluded



Map scale 1:5,650

Assumes printed map area measures 395mm by 272mm.

**ORBITAL
WITNESS**

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IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

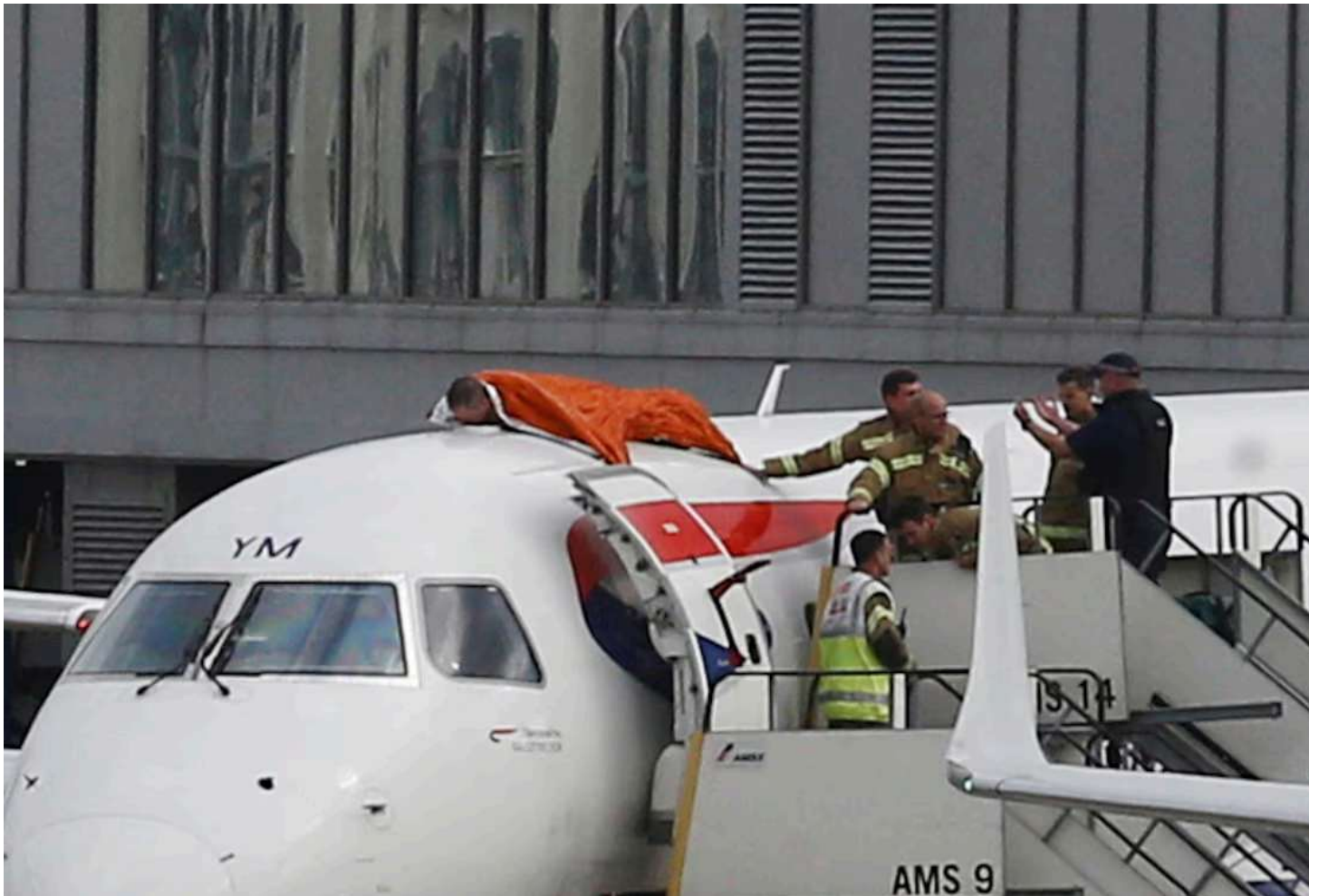
- v -

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW8

This is the exhibit marked "AJW8" in the witness statement of Alexander James Wright.



Pictures

20 Photos · October 10, 2019 · 9:50 PM GMT+1

Extinction Rebellion disrupt London City Airport

Protest organizers with Extinction Rebellion had vowed to occupy the airport's terminal and shut down operations for days as part of its action in the British capital.

LONDON, United Kingdom

Feedback



[1/20] An Extinction Rebellion protester stands on the top of the roof during a demonstration at London City Airport, October 10. A protester lay on top of a plane while another forced a jet to turn around on the runway as climate change activists descended on London City Airport on Thursday, causing some flight disruption as the number of arrests this week topped 1,000. REUTERS/Henry Nicholls

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[2/20] Extinction Rebellion protesters with bikes block a roundabout during a demonstration, near London City Airport, October 10. REUTERS/Henry Nicholls

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[3/20] Extinction Rebellion protesters dressed as airport marshalls block the road during a demonstration, near London City Airport, October 10. REUTERS/Henry Nicholls

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[4/20] Police officers detain an Extinction Rebellion protester during a demonstration, near London City Airport, October 10. REUTERS/Henry Nicholls

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[5/20] A police officer unglues an Extinction Rebellion protester's hand during a demonstration, near London City Airport, October 10. REUTERS/Henry Nicholls

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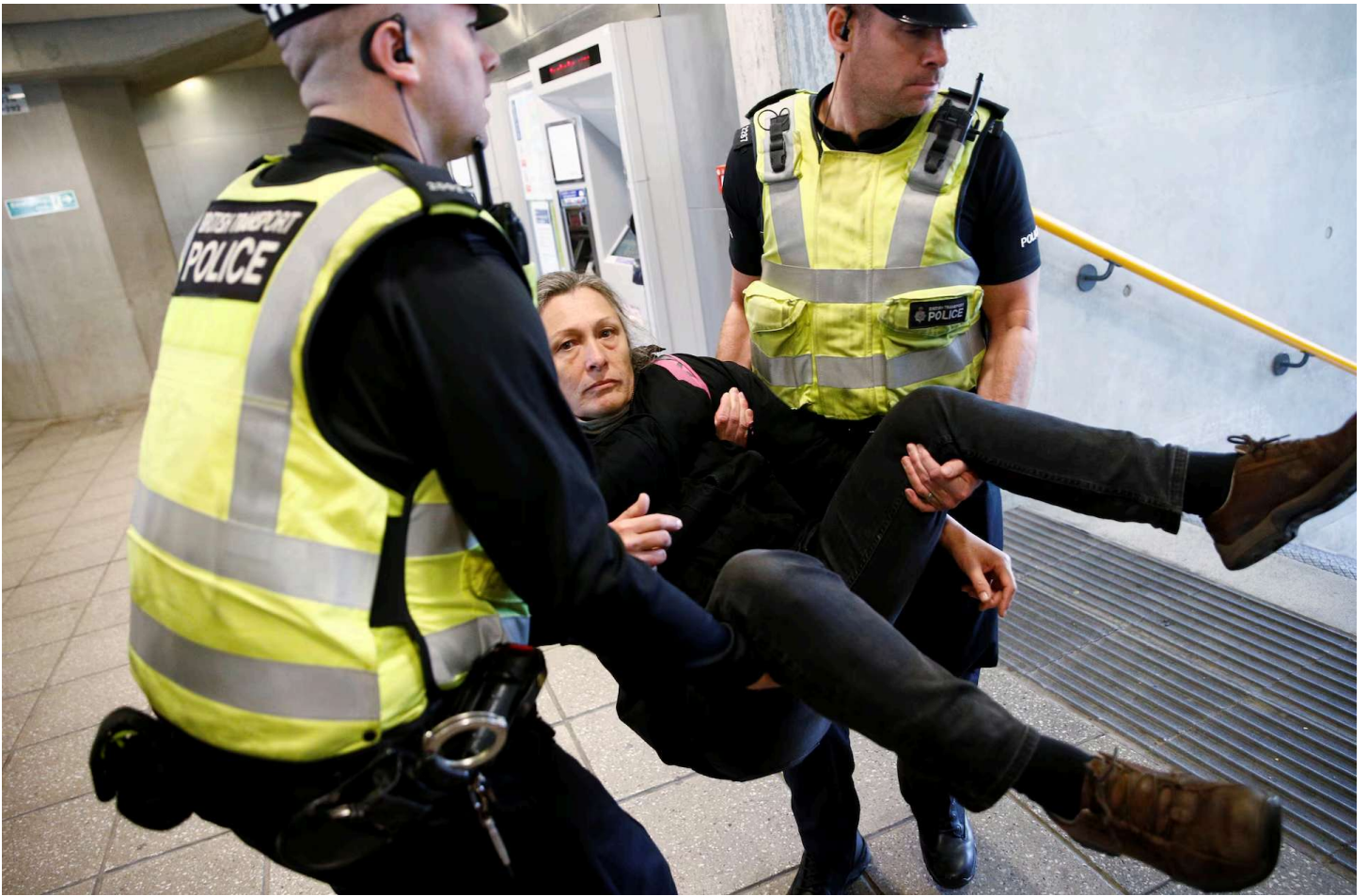
[6/20] Extinction Rebellion protesters block the road outside of the airport during a demonstration at London City Airport, October 10. REUTERS/Henry Nicholls

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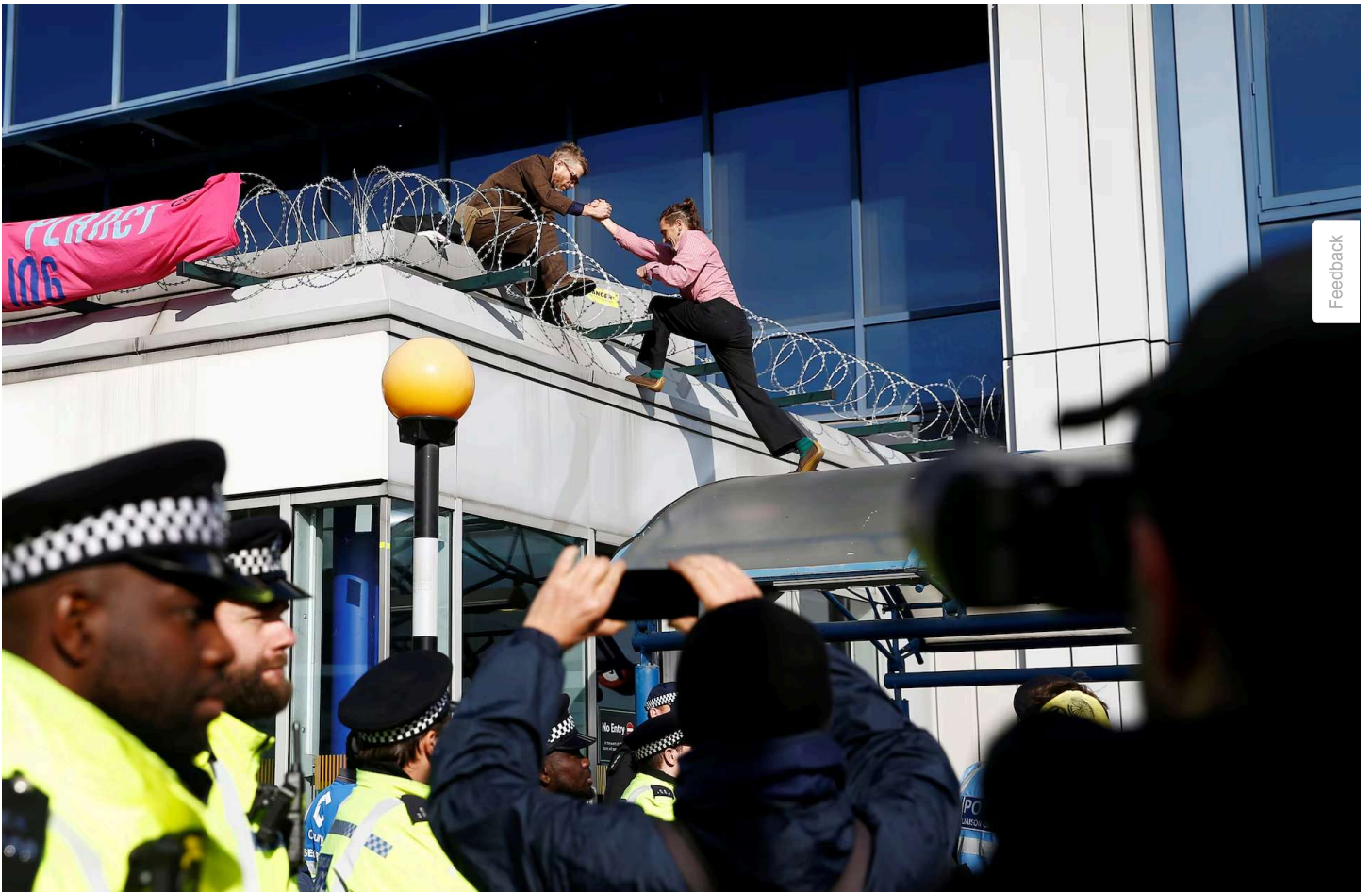
[7/20] An Extinction Rebellion protester holds a placard during a demonstration at London City Airport, October 10. REUTERS/Henry Nicholls

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[8/20] Police officers detain Extinction Rebellion protester during a demonstration at London City Airport, October 10. REUTERS/Henry Nicholls

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Feedback

[9/20] An Extinction Rebellion protester helps a fellow protester to reach the top of the roof during a demonstration at London City Airport, October 10. REUTERS/Henry Nicholls

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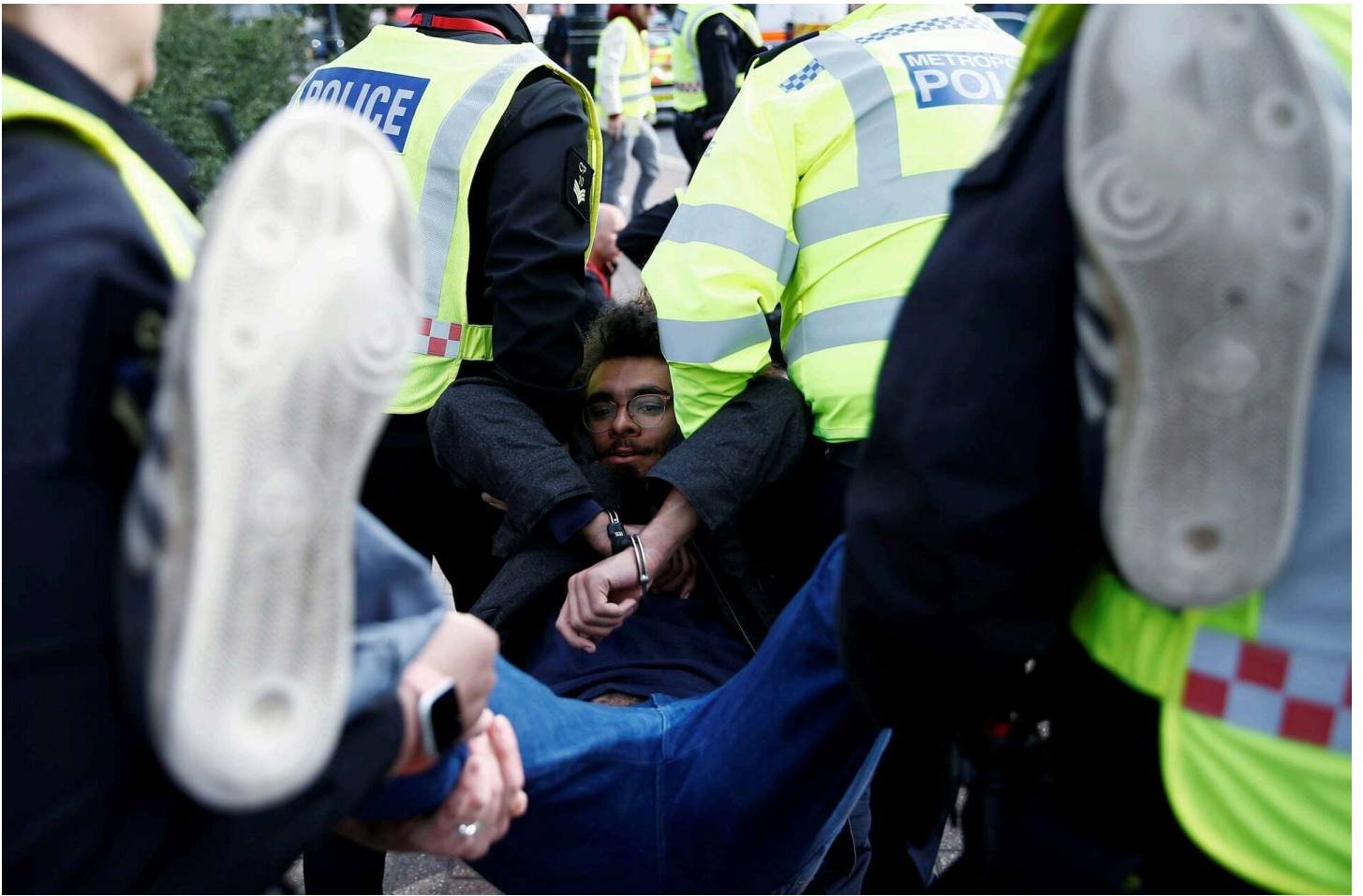
[10/20] Security personnel remove a protester, who Extinction Rebellion says is former Paralympic athlete James Brown, lying on top of a British Airways plane at London City Airport, October 10. REUTERS/Henry Nicholls

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[11/20] Extinction Rebellion protesters with bikes block a roundabout during a demonstration, near London City Airport, October 10. REUTERS/Henry Nicholls

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[12/20] Police officers detain an Extinction Rebellion protester during a demonstration, near London City Airport, October 10. REUTERS/Henry Nicholls

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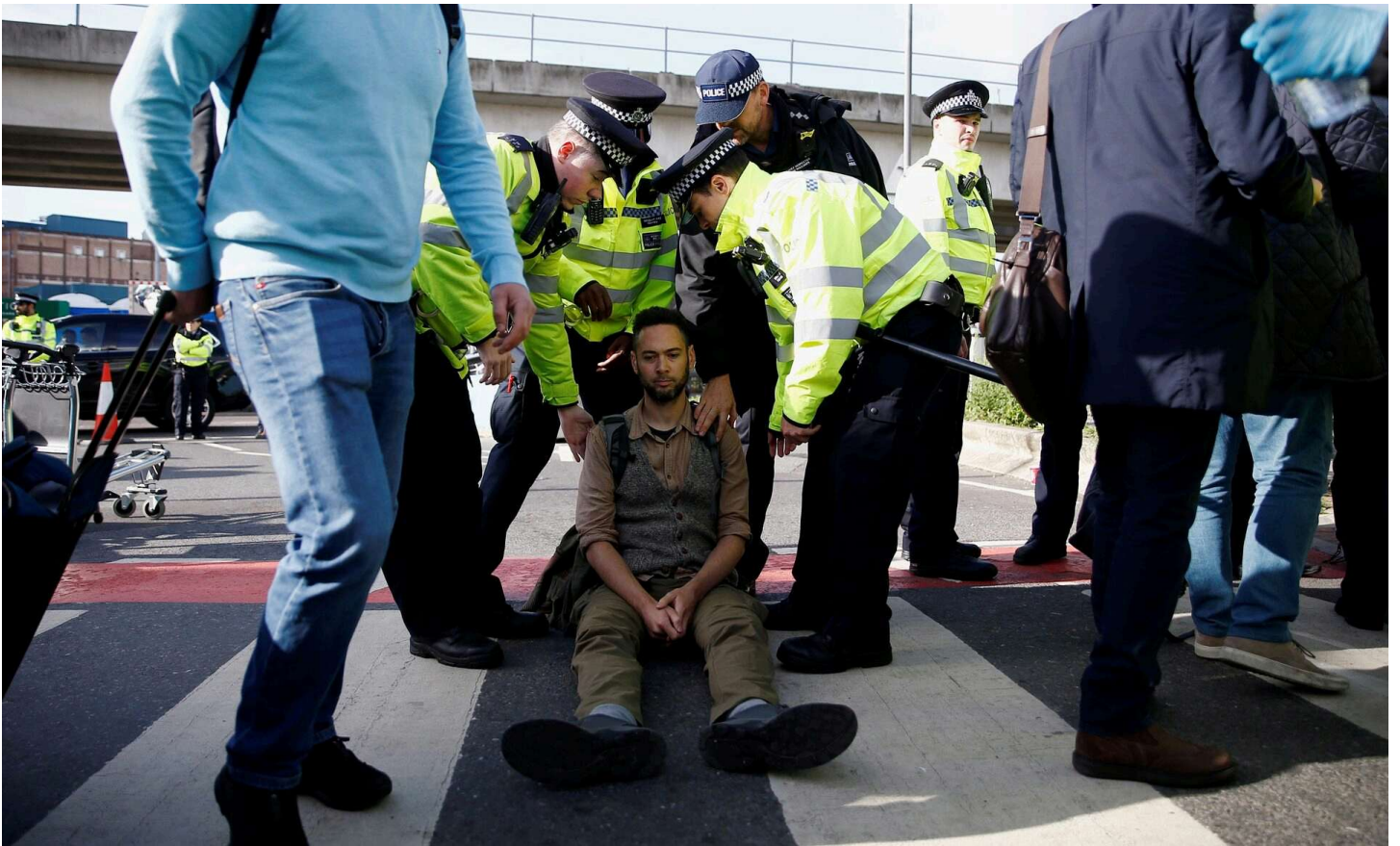
[13/20] Extinction Rebellion protesters block the road outside of the airport during a demonstration at London City Airport, October 10. REUTERS/Henry Nicholls

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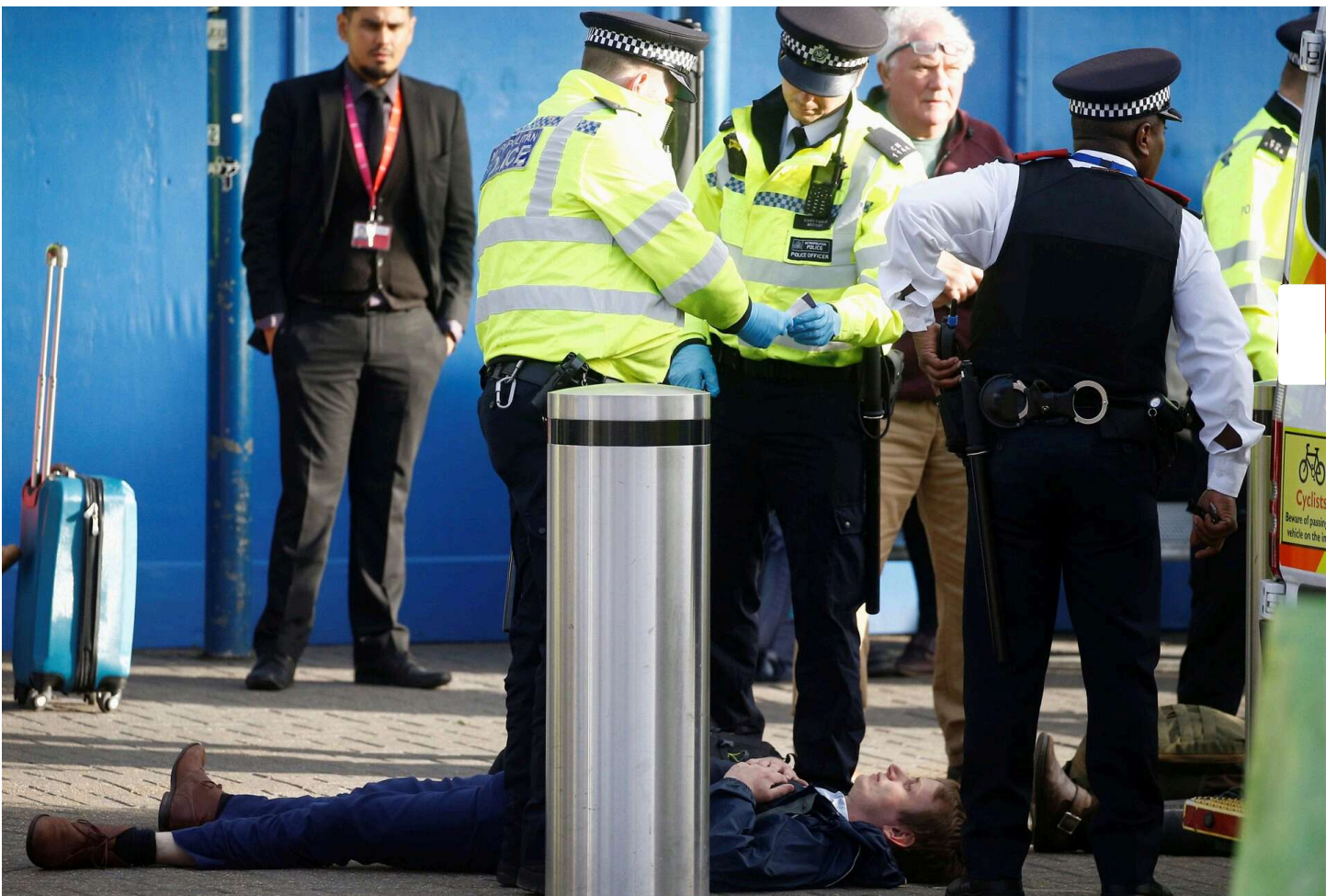
[14/20] Police officers detain an Extinction Rebellion protester during a demonstration, near London City Airport, October 10. REUTERS/Henry Nicholls

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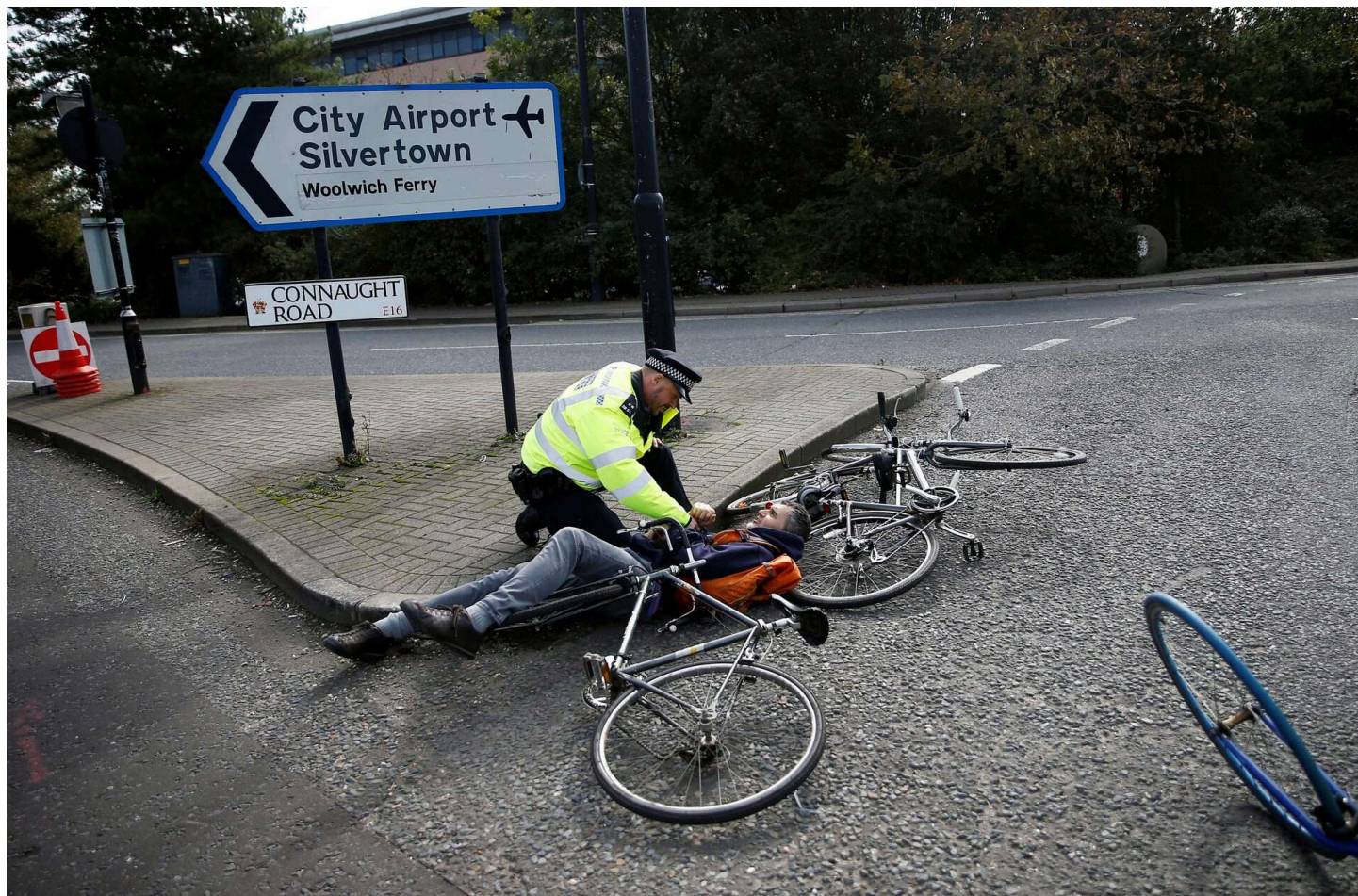
[15/20] Police officers detain an Extinction Rebellion protester during a demonstration at London City Airport, October 10. REUTERS/Henry Nicholls

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[16/20] Police officers detain Extinction Rebellion protesters during a demonstration at London City Airport, October. REUTERS/Henry Nicholls

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[17/20] A police officer checks on an Extinction Rebellion protester with bikes as they block a roundabout during a demonstration, near London City Airport, October 10. REUTERS/Henry Nicholls

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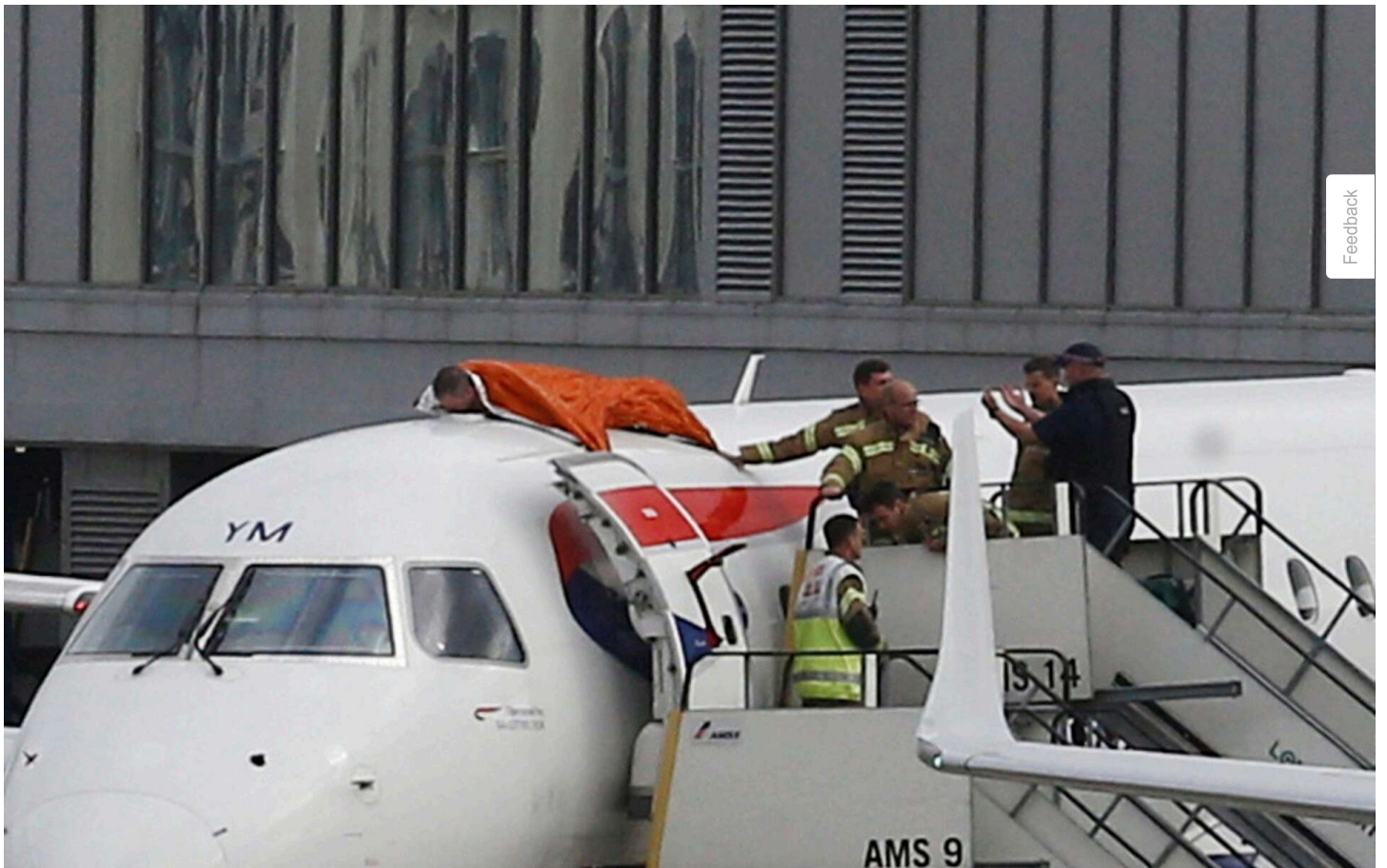
[18/20] Extinction Rebellion protesters with bikes block a roundabout during a demonstration, near London City Airport, October 10. REUTERS/Henry Nicholls

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[19/20] An Extinction Rebellion protester stands on the top of the roof during a demonstration at London City Airport, October 10. REUTERS/Henry Nicholls

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[Feedback](#)

[20/20] A protester, who Extinction Rebellion says is former Paralympic athlete James Brown, lies on top of a British Airways plane at London City Airport, October 10. Protest organizers Extinction Rebellion had vowed to occupy the airport's terminal and shut down operations for three days as part of its action in the British capital. REUTERS/Henry Nicholls

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IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW9

This is the exhibit marked "AJW9" in the witness statement of Alexander James Wright.

Terrorism threat levels



What are terrorism threat levels?

Terrorism threat levels indicate the likelihood of a terrorist attack in the UK. There are two published threat levels.

There are 5 categories at which the threat levels could be set:

- LOW - an attack is highly unlikely
- MODERATE - an attack is possible, but not likely
- SUBSTANTIAL - an attack is likely
- SEVERE - an attack is highly likely
- CRITICAL - an attack is highly likely in the near future

Members of the public should always remain alert to the danger of terrorism and report any suspicious activity to the police on 999 or the anti-terrorist hotline: 0800 789 321. If your information does not relate to an imminent threat, you can also [contact MI5](#).

Current national threat level

The threat to the UK (England, Wales, Scotland and Northern Ireland) from all forms of terrorism is SEVERE.*

Current Northern Ireland-related Terrorism in Northern Ireland threat level

The threat to Northern Ireland from Northern Ireland-related terrorism is SUBSTANTIAL.

*The national terrorism threat level covers all forms of terrorism aside from Northern Ireland-related terrorism in Northern Ireland.

Threat level change alerts



To receive threat level updates, subscribe to our [threat level alert RSS feed](#). This will require an RSS reader or browser extension.

How are threat levels decided?

The [Joint Terrorism Analysis Centre \(JTAC\)](#) is responsible for setting the threat level for the UK from terrorism, and the threat level from Northern Ireland Related Terrorism in Northern Ireland.

Both threat levels are kept under regular review.

In reaching an assessment on the appropriate threat level, several factors are considered.

These include:

- Available intelligence. This will often involve making judgements about the threat based on a range of information, which is often fragmentary, including the level and nature of current terrorist activity, comparison with events in other countries and previous attacks. Intelligence is only ever likely to reveal part of the picture.
- Terrorist capability. An examination of what is known about what a terrorist could do based on previous attacks or from intelligence.
- Terrorist intentions. Using intelligence and publicly available information to examine the overall aims of the terrorists and the ways they may achieve them including what sort of targets they would consider attacking.
- Timescale. The threat level expresses the likelihood of an attack in the near term. We know from past incidents that some attacks take years to plan, while others are put together more quickly. In the absence of specific intelligence, a judgement will need to be made about how close an attack might be to fruition.

What does this mean for you?

Vigilance is vital regardless of the current national threat level. Sharing national threat levels with the general public keeps everyone informed. It explains the context for the various security measures (for example airport security or bag searches) which we may encounter.

Changes to threat levels in themselves do not necessarily require specific responses from the public. They are a tool for security practitioners and the police to use in determining what protective security response may be required. If you are a business/site looking for advice and guidance - or even a general member of the public - go to the [NPSA website](#) or [ProtectUK](#) for further support and guidance.

If you have information about possible terrorist activity, you can call the Anti-Terrorist Hotline confidentially on 0800 789 321.

For warnings about urgent threats (for example, a possible bomb threat) please call 999.

For more advice on what to look out for, take a look at [this page](#).

Are there threat levels for other countries?

Advice about foreign travel, including the threat from terrorism in other countries, is published on the [FCDO website](#).



Countering terrorism

MI5 is responsible for investigating all forms of terrorist threat to the UK. Our role is to identify, investigate and work with partners to disrupt all forms of terrorist threat in the UK and against UK interests overseas.

[Find out more](#)

Threat level history

Since 2006, information about the national threat level has been published. In September 2010 the threat level for Northern Ireland-related terrorism began to be published.

In July 2019 changes were made to the terrorism threat level system, to reflect the threat posed by all forms of terrorism, irrespective of ideology.

National Threat Level

Date	Threat Level
30 April 2026	SEVERE
9 February 2022	SUBSTANTIAL
15 November 2021	SEVERE
4 February 2021	SUBSTANTIAL
3 November 2020	SEVERE
4 November 2019	SUBSTANTIAL
23 July 2019	SEVERE

Northern Irish Related Terrorism in Northern Ireland Threat Level

Date	Threat Level
6 March 2024	SUBSTANTIAL
28 March 2023	SEVERE
22 March 2022	SUBSTANTIAL
23 July 2019	SEVERE

Threat levels prior to July 2019

Date	Threat from international terrorism	Threat from Northern Ireland-related terrorism	
		in Northern Ireland	in Great Britain
1 March 2018	SEVERE	SEVERE	MODERATE
17 September 2017	SEVERE	SEVERE	SUBSTANTIAL
15 September 2017	CRITICAL	SEVERE	SUBSTANTIAL
27 May 2017	SEVERE	SEVERE	SUBSTANTIAL
23 May 2017	CRITICAL	SEVERE	SUBSTANTIAL
11 May 2016	SEVERE	SEVERE	SUBSTANTIAL
29 August 2014	SEVERE	SEVERE	MODERATE
24 October 2012	SUBSTANTIAL	SEVERE	MODERATE
11 July 2011	SUBSTANTIAL	SEVERE	SUBSTANTIAL
24 September 2010	SEVERE	SEVERE (first published)	SUBSTANTIAL (first published)

Date	Threat from international terrorism	Threat from Northern Ireland-related terrorism	
		in Northern Ireland	in Great Britain
22 January 2010	SEVERE		
20 July 2009	SUBSTANTIAL		
4 July 2007	SEVERE		
30 June 2007	CRITICAL		
13 August 2006	SEVERE		
10 August 2006	CRITICAL		
1 August 2006	SEVERE (first published)		



IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW10

This is the exhibit marked "AJW10" in the witness statement of Alexander James Wright.

Incidents from July 2025

<u>Date of Event/press</u>	<u>Location</u>	<u>Brief details of event etc.</u>	<u>Link to source of informations</u>
02/07/2025	Sheffield	Protest by Extinction Rebellion outside Aviva offices - calling for the business to refuse to insure oil, gas and coal companies.	https://www.thestar.co.uk/news/opinion/aviva-employees-challenged-to-be-climate-heroes-5214141
03/07/2025	London	Extinction Rebellion supporters blockaded the entrance to the Energy Insurance London Conference.	https://extinctionrebellion.uk/2025/07/03/insurance-conference-blockade-heralds-nationwide-week-of-action/
05/07/2025	UK Wide	Insure our Survival Campaign: a seven-day environmental / anti-fossil fuels protest as part of Extinction Rebellion's Summer of Action.	https://extinctionrebellion.uk/2025/07/02/insure-our-survival-campaign-wave-of-action-2025-anniversary/
05/07/2025	London Oxford Airport	Extinction Rebellion supporters marched to the airport to draw attention to the number of private jets carrying ultra-wealthy passengers.	https://www.thecooldown.com/green-business/oxid-airport-private-jet-flights-oxford-extinction-rebellion-carbon-footprint/
07/07/2025	Various, UK	Members of Extinction Rebellion protested outside of different branches of insurance brokers, Marsh, including in Penrith, Carlisle and Kendal as part of the national day of action against insurance businesses.	https://cwherald.com/news/extinction-rebellion-protest-outside-insurance-brokers/
09/07/2025	Inverness Airport	Protestors led by Extinction Rebellion Scotland protested outside the terminal to campaign against private jet company Blackbird Air.	https://xrscotland.org/2025/02/extinction-rebellion-scotland-and-scientist-rebellion-denmark-protest-private-jets-company-blackbird/
09/07/2025	London	Extinction Rebellion supporters disrupted the British Insurance Awards by blocking the red carpet. Two activists were detained after getting into the venue and planning to take to the stage to drop a banner.	https://extinctionrebellion.uk/2025/07/09/breaking-climate-activists-detained-at-the-oscars-of-the-insurance-industry/
11/07/2025	Shrewsbury	Extinction Rebellion supporters targeted the offices of Marsh and Howden in an insurance-related protest relating to fossil fuels with protestors calling for the support of new projects to be ended.	https://www.insurancetimes.co.uk/news/extinction-rebellion-target-howden-and-marsh-offices-in-shrewsbury/1455779.article
16/07/2025	London	Extinction Rebellion supporters targeted AIG as part of the Insure Our Survival campaign.	https://extinctionrebellion.uk/2025/07/16/rebels-target-insurance-hq-standing-in-solidarity-with-detained-kenyan-protesters/
21/07/2025	Reading	Two banners appeared above the A329 motorway reading "Your Planet Needs You" and "Tax The Rich". Extinction Rebellion claimed responsibility.	https://www.readingchronicle.co.uk/news/25330083.reading-extinction-rebellion-protest-a329-motorway/
21/07/2025	Oxford	Extinction Rebellion supporters staged a 'crime scene' at Barclays, protesting about the bank financing the fossil fuel industry.	https://www.thisisoxfordshire.co.uk/news/25331812.extinction-rebellion-protesters-die-demonstration/
23/07/2025	London	Five Extinction Rebellion protestors dressed as scientists and occupied the lobby of Prudential Regulation Authority demanding capital requirements on fossil fuels in the insurance and banking sectors.	https://extinctionrebellion.uk/2025/07/23/scientists-for-xr-occupy-the-bank-of-england/
26/07/2025	Edinburgh	Ten Greenpeace activists arrested after suspending themselves from a bridge outside Edinburgh. They dangled themselves 25m above the water line, stopping a tanker delivering for 24 hours	https://news.sky.com/story/ten-greenpeace-activists-arrested-after-suspending-themselves-from-bridge-outside-edinburgh-13402046
28/07/2025	London	Fossil Free London activists dressed as robbers emblazoned with the Norwegian flag staged a "heist" at the Bank of England to highlight the "daylight robbery" that approval of the application for exploitation of the Rosebank oil field would entail.	https://www.morningstaronline.co.uk/article/bank-england-heist-ministers-face-fresh-anti-rosebank-oil-field-protests
22/08/2025	UK Wide	"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 - cutting power to Carlcays' Barclaycard's Northampton Headquarters	https://morningstaronline.co.uk/article/activists-cut-utilities-worlds-biggest-fossil-fuel-investors-declaring-summer-sabotage
23/08/2026	Hertfordshire	Extinction Rebellion activists staged a protest against Howden Insurance and its involvement with fossil fuel projects.	https://www.whitimes.co.uk/news/25416588.welwyn-garden-city-extinction-rebellion-protest-howden/
05/09/2025	London	Three climate protestors from Climate Resistance were carried out after disrupting the Reform UK party conference.	https://www.independent.co.uk/news/uk/home-news/nigel Farage-reform-clacton-angela-rayner-b2821237.html
07/09/2025	UK Wide	Various protest groups staged protests across the country against Rosebank, the UK's largest untapped oil field.	https://www.thecanary.co/uk/news/2025/09/07/fossil-fuel-protests-starmer/
08/09/2025	London	Extinction Rebellion (XR) confirmed plans to target companies it says are enabling fossil fuel projects - including Axa and AIG.	https://www.insurancetimes.co.uk/news/two-insurers-named-as-targets-in-next-extinction-rebellion-climate-protest-offensive/1456087.article
08/09/2025	London	Insure our Survival' activists staged protests at the London City offices of Axa and AIG blockig access and calling on insurers to stop underwriting fossil fuel risks.	https://www.insurancetimes.co.uk/news/protesters-project-toxic-images-onto-insurers-city-offices/1456314.article
15/09/2025	Reading	Extinction Rebellion activists "held a "die-in" at Barclays Bank in Reading, where protestors lay on the ground to simulate death, to link the funding of fossil fuels projects with climate change and global deaths	https://rdg.today/extinction-rebellion-protester-stage-die-in-at-barclays-bank-in-reading/
16/09/2025	Ipswich	Extinction Rebellion activists took part in a global demonstration against large insurance companies calling on the companies to stop funding fossil fuels.	https://www.ipswichstar.co.uk/news/25466328.extinction-rebellion-holds-protest-ipswich-axa-offices/

18/09/2025	Stansted Airport	Two young people who spray-painted two private jets at Stansted Airport in June 2024 were found guilty of criminal damage at Chelmsford Crown Court. They had cut through the wire perimeter fence and sprayed paint onto two private jets as part of a Just Stop Oil protest, to demand the UK government to negotiate a treaty to phase out oil and gas by 2030.	https://juststopoil.org/2025/09/18/wash-it-off-private-jet-sprayers-found-guilty/
22/09/2025	Glasgow	Extinction Rebellion held a protest outside of AXA's office accusing it of "keeping killers safe" by insuring or investing in, amongst other things, fossil fuel projects.	https://morningstaronline.co.uk/article/insurance-giant-accused-keeping-killers-safe-glasgow-protest
05/11/2025	London	Fossil Free London campaigners disrupted BP panel event at Simmons & Simmons LLP.	Activists disrupt BP panel over hurricane-fuelling profits Morning Star
04/12/2025	London	Fossil Free London campaigners disrupted Oil Executive awards dinner in London with attendees including Shell, BP and Ithica Energy.	Campaigners disrupt Oil Executive awards dinner in London - Canary
10/12/2025	Southampton	Climate activist group 'Cut the Ties to Fossil Fuels' staged a climate demonstration in Southampton, with one arrest made.	Arrest made as climate activists stage protest in Southampton
15/01/2026	London / Manchester	Environmental and humanitarian protestors rallied at Zurich offices demanding it drops contracts with Shell, Chevron, Maersk and General Dynamics.	Protesters call on Zurich Insurance to drop deals with Shell and General Dynamics - Canary
19/01/2026	London	Extinction Rebellion staged a protest outside Macquarie Group Headquarters to protest against expansion at Farnborough Airport. Two activists occupied the entrance to the building unfurling a banner that calls for a ban on private jets and urged the investment firm to sever its connection to fossil fuels.	https://www.reutersconnect.com/item/activists-stage-extinction-rebellion-protest-against-private-jet-expansion-in-london/dGFnOnJldXRlcnMuY29tLDIwMjY6bmV3c21sX01UMVNJUEEwMDBPRjIjXU1k
01/04/2026	London	Fossil Free London supporters protested outside US Embassy in London in response to the increase in oil company profits in the wake of the war in Iran.	https://www.thecanary.co/uk/news/2026/04/01/cut-ties-to-big-oil-to-stop-energy-crisis-sparked-by-trumps-war-on-iran-protest-footage/
05/05/2026	London	Activists from Fossil Free London staged a protest outside Equinor's offices, piling life-sized body bags outside the building while one campaigner dressed as an oil executive stood on top of them.	https://fossilfreelondon.org/photocall-body-bags-piled-outside-equinor-as-q1-profit-spike-expected-from-iran-war/
06/05/2026	York	Protestors, claiming to be associated with Boycott Bloody Insurance, protested outside Aviva's boardroom in York whilst they had their AGM.	Protesters take aim at Aviva as shareholder meetings face disruption
06/05/2026	London	Fossil Free London protested outside Shell HQ ahead of quarterly profits which are due to be announced on 7 May 2026.	Fossil Free London pours fake blood outside Shell offices as it 'makes a killing' from the Iran war Morning Star
07/05/2026	London	Climate activists disrupted Barclays shareholder meeting.	Barclays shareholder meeting targeted by Palestine and climate activists The Independent
08/06/2026	Southend Airport	See Briefing Note referred to in accompanying Alex Wright Witness Statement	See Briefing Note referred to in accompanying Alex Wright Witness Statement

Aviva employees challenged to be climate heroes.

Employees arriving for work at Aviva last Wednesday were met with a cheery group of Extinction Rebellion activists challenging them to become climate heroes.

They were handed leaflets explaining how their business could stop oil gas and coal companies from burning down the planet by refusing to insure them.

Heather, from [Extinction Rebellion](#), explained:

"[Insurance](#) is the weak spot that could stop the fossil fuel industry from exploiting more oil, gas and coal, driving the accelerating climate crisis. Without insurance, the fossil fuel industry would have to stop its planet-wrecking operations because it wouldn't be able to afford the financial costs if something went wrong. By effectively insuring the climate emergency, the insurance industry is helping to create the extreme weather that floods and overheats homes, workplaces and schools, threatens our food supply and is likely to lead to conflict and more places becoming uninhabitable. It also causes increasing disruption to nature."



Sean, who held a placard saying "Help. This is an urgent Nature and Climate Emergency", said, "The insurance industry could be climate heroes and use their 'superpower' to shut down the fossil fuel industry and help save our entire civilisation, and the biosphere that we rely on for life. We're here at [Aviva](#) today because they are insuring fossil fuel projects that are destroying all of our futures. We are pleased that Aviva has agreed to stop insuring new fossil fuel projects, but demand that they stop insuring oil, gas and coal projects."

The campaigners also visited AON on Napier Street, an insurance broker. Letters were sent to both companies.

XR's Insure Our Survival campaign has already made the insurance industry sit up, take notice and act. In February and October last year thousands of XR activists, acting alongside a global campaign coalition called Insure Our Future, staged a week-long series of actions across the world. Sheffield XR supported the lobby of the British Insurance and Brokers Association Conference in Manchester last May.

After repeated mass visits to the offices of insurers in the City of London and in towns and cities across the UK, giant global insurer Zurich announced that it would no longer insure new oil and gas projects.





Insurance conference blockade heralds nationwide week of action

July 03, 2025 by Extinction Rebellion

Supporters of Extinction Rebellion’s Insure Our Survival campaign have this morning (Thursday 3 July) blockaded the main entrance to the Energy Insurance London conference [1] in Blackfriars with a five-metre banner. The blockaders have one simple demand for the delegates: stop insuring new fossil fuel projects.

The protest comes at the start of a national wave of action against the insurance companies that are ensuring climate chaos by continuing to underwrite fossil fuels. [2]

This morning’s blockade has forced delegates to duck under the banner or walk around it to access the building. Samba drummers add to a jubilant and defiant atmosphere. XR supporters are inviting delegates, with flyers and business cards, to be “climate heroes” by joining a small but growing network [3] of insurance professionals helping to bring about a rapid transition away from fossil fuels.

The conference's main sponsor Axa became a climate leader back in 2017 when it became the first insurer to start ruling out support for coal, but its reputation has slipped in recent years as it has not kept pace with developments and has failed to rule out support for new oil and gas [4]. Most controversially, Axa is amongst the

insurers of Liquid Natural Gas (LNG) export terminals, which export fracked methane from the US Gulf Coast which is poisoning the groundwater of local communities. [5] If built, these terminals will export the equivalent of 239 coal plants' worth of greenhouse gas annually [6, 7].

The conference covers a range of sources of energy, but it's known as one of the oiliest events in the insurance calendar. One item on the agenda is a panel discussion entitled The Trump Effect and "Drill Baby, Drill", saying "the return of President Trump to the White House has certainly reinvigorated the energy conversation worldwide" [8].

Earlier this month, a groundbreaking report showed the real-world impact of climate campaigns focusing on the insurance industry. The independent research shows that after insurers adopt formal exclusion policies, the number of insured coal mines drops by 16%, insured coal volumes fall by 56% and affected mines are more likely to scale down or shut entirely. The research was conducted by University of Zurich and the SFI Swiss Finance Institute using Freedom of Information searches. [9, 10, 11]

Also this month new analysis of tactics and strategies available to climate protectors, authored by the Social Change Lab highlighted the unique potential for campaigning on insurance to bring about change. [12]

One of the people blockading the entrance, Sue Hampton, 68, a grandma, Quaker and ex-teacher from Berkhamsted, said: *"No matter how much we scale up renewable energy, that won't stop climate breakdown. We need to rapidly phase-out of coal, oil and gas if we are going to have any chance of staying within the Paris Agreement targets which were agreed by the whole world. Insurance companies have a special opportunity and responsibility to withdraw support from all fossil fuel projects now. A managed transition is still possible."*

Another blockader, Alex Penson, 42, biologist from north London. said: *"Coal, oil and gas projects are flooding and burning the world right now. We urge delegates to push for exclusion policies within their companies and connect with a growing network of insurance professionals doing this."*



Insure Our Survival Campaign Marks First Anniversary with Nationwide Wave of Action Targeting Fossil Fuel Insurers

July 02, 2025 by Extinction Rebellion

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For immediate release

This July, the Insure Our Survival (IOS) campaign marks one powerful year of mobilisation.