

**AMENDED PURSUANT TO THE ORDER OF THE HONOURABLE MR JUSTICE
SOOLE DATED 30 JUNE 2026**

IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION

CLAIM NO: KB-2024-001765

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 OR THE TAKE BACK POWER
CAMPAIGN OR OTHER WEALTH INEQUALITY 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

AMENDED 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/tZloduqpqTMtE9dgMMhlaymvEZgO45jgJ19A>)

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

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

You don't want to miss this.

See you there,

Just Stop Oil"

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

18A. On 27 March 2025, Just Stop Oil made a public announcement which appeared to give the impression that the group would no longer operate by way of carrying out protest by direct action.

18B. On 21 May 2025, Just Stop Oil wrote to its subscribers stating that it was "plotting a comeback".

18C. At the date of these re-amended particulars of claim, Just Stop Oil advertises on its website that it has a new project, which is described as: "The rich are killing us. To stop them and fix our broken country we need to...Take back POWER". Further still, that website (1) promotes revolutionary change which it identifies as being necessary in view of "corrupt politicians [...] serving the interests of billionaires"; (2) links directly to another website, being that of a campaign group known as Take Back Power.

18D. Take Back Power is a campaign group that has been carrying out protest by direct action since around December 2025 and whose targets so far have included luxury hotels, the Tower of London, Parliament, supermarkets, the auction house Sotheby's, a Ferrari dealership, and the luxury department store Liberty's. It describes itself on its website as:

a. Engaging disruptive direct action because it is "a necessary part of social change" and because "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..."

b. A nonviolent civil resistance group, the aims of which include the taxation of the rich.

18E. The Claimants believe that individuals involved with and/or carrying out protests under the banner of Take Back Power have previously been involved with and/or carried out protests for Extinction Rebellion and Just Stop Oil. That belief is based upon an article published by the Guardian newspaper on 25 April 2025.

18F. There are private jet facilities situate at the Airport. Private jet facilities have been the targets of direct action by Just Stop Oil and Extinction Rebellion protestors, namely:

a. On 20 June 2024, supporters of Just Stop Oil carried out direct action at London Stansted Airport, as part of a series of protests on climate change. This included spray painting two private jet aircraft orange using a fire extinguisher.

b. On 5 July 2025 and 9 July 2025, protestors connected with Extinction Rebellion protested at London Oxford Airport and Inverness Airport to campaign against private jets.

18G. In the circumstances set out in paragraph 18F above and where the “rich” or the “super-rich” are perceived users of private jets, the targets of the direct action by activists operating under the banner of Take Back Power may include the 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 12-18G 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.

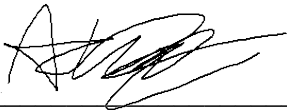
YAASER VANDERMAN

Landmark Chambers

STATEMENT OF TRUTH

The Claimants believe that the facts stated in these amended particulars of claim are true. The Claimants understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by the Claimants to sign this statement.



~~Stuart Sherbrooke Wortley~~ Alexander James Wright

~~Partner~~ Legal Director

Eversheds Sutherland (International) LLP

Claimants' solicitor

7 July 2026