

N244

Application notice

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Name of court In the High Court of Justice King's Bench Division		Claim no. KB-2024-002210	
Fee account no. (if applicable)		Help with Fees - Ref. no. (if applicable)	
PBA0076972		H W F - - - - -	
Warrant no. (if applicable)			
Claimant's name (including ref.) HEATHROW AIRPORT LIMITED			
Defendant's name (including ref.) (1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM (2) THE NAMED DEFENDANTS SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS OF CLAIM			
Date		3 July 2026	

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

Bryan Cave Leighton Paisner LLP

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent?

Claimant

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

1. An order amending the description of the First Defendant (persons unknown) so that it expressly covers unlawful activities carried out by the “Take Back Power” group and/or ostensibly in connection with a campaign against wealth inequality as opposed to environmental campaign.

2. Orders pursuant to CPR r.17.1 to permit amendments to the Re-Amended Claim Form and Re-Amended Particulars of Claim to record that change (in the form filed herewith in draft), and for the existing Injunction to be varied to reflect the change (in the manner provided in the amended draft Order filed herewith).

3. The order is sought because (as explained in the 3rd Witness Statement of Philip Spencer, already filed in these proceedings), Take Back Power has been announced as a “new project” of Just Stop Oil, and is a campaign ostensibly directed against “the super rich” including (but not necessarily limited to) their perceived effect on climate change.

4. The existing description of the First Defendant therefore risks ambiguity or a lacuna in the event that unlawful direct action is carried out by Take Back Power and/or ostensibly directed at socioeconomic issues as opposed to environmental campaigns.

5. Materially the same amendment to the description of the “person unknown” Defendants has recently been made in respect of other airport injunctions: (i) at the second annual review hearing for 10 other major UK airports on 30 June 2026; and (ii) at the second annual review hearing for London Southend Airport on 2 July 2026. It is desirable that a common approach should be adopted between similar injunctions affecting all major UK airports.

4. Have you attached a draft of the order you are applying for? [The draft order attached shows, tracked, amendments made to the Injunction presently in force.]	☒ 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?	N/A Hours N/A Minutes
Is this time estimate agreed by all parties?	☐ Yes ☐ No
7. Give details of any fixed trial date or period	Second Annual Review Hearing on 9 July 2026
8. What level of Judge does your hearing need?	Judge
9. Who should be served with this application?	The Defendant: Claimant to serve
9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.	

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

- ☒ the attached witness statement [Spencer 3]
- ☐ the statement of case
- ☒ the evidence set out in the box below

1. The second annual review hearing of an injunction preventing unlawful 'direct action' protest at London Heathrow Airport ("the Airport") is to be heard on 9 July 2026.
2. The First Defendant to the existing proceedings (and injunction) is: "PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM."
3. As explained in Spencer 3, already filed in these proceedings (and contained in the hearing bundle (at Tab 9, p.94ff), Just Stop Oil's website advertises (as a "New Project") an (apparently) related group called "Take Back Power".
4. Take Back Power's own website (as also explained in Spencer 3) expresses an intention to "*undertake nonviolent action to resist the super-rich*". That appears to be motivated, at least in part, by environmental concerns (e.g., the statement that the super-rich "*profit from [...] heating the world to boiling point*", but may also be motivated by broader socioeconomic concerns. Take Back Power has carried out unlawful direct-action activities against luxury retailers and service providers (as detailed in Spencer 3).
5. The Claimant reasonably fears that the Airport is, absent injunctive relief, a likely target for such direct-action activities. That is particularly so given: (i) the use of the Airport by a large number of long-haul and/or legacy carriers offering premium cabins and (ii) a large number of premium and/or luxury retail outlets in the terminal shopping facilities.
6. Whilst the Claimant considers that direct-action activities targeting the Airport (or such facilities therein) would properly be characterised as having sufficient environmental motivation to fall within the existing definition of the persons unknown defendant, they recognise that some ambiguity may in practice arise if ostensibly carried out with socioeconomic motivations.
7. The Claimant further notes that 11 other UK airports (London City, Manchester, Stansted, East Midlands, Leeds Bradford, Luton, Newcastle, Birmingham, Bristol and Liverpool (all heard on 30 June 2026); and London Southend Airport (heard 2 July 2026)), have the benefit of similar injunctions which were (insofar as the lacuna arose in relation to them) varied so as to cover expressly Take Back Power and/or wealth inequality campaign at those review hearings.
8. The Claimant, therefore, seeks leave to amend the definition of the First Defendant (and to amend their Re-Amended Claim Form and Re-Amended Particulars of Claim accordingly) so that it reads:

"PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHER WEALTH INEQUALITY CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM."
9. This application will be served in accordance with the mechanisms provided for service on the First Defendant under the existing Injunction.
10. In addition, the Claimant will provide notice of this Application to Take Back Power via the email addresses available on its website. The Claimant is unaware of any other practicable step as may be taken to notify Take Back Power of this application.
11. This amendment does not affect the named defendants joined to these proceedings as Defendants 2-26: those defendants are (by paragraph 1 of the existing injunction) restrained from entering the Airport without the Claimant's consent irrespective of their ostensible reason for so doing.

12. That these steps of notification have been taken will be confirmed in a further witness statement confirming the notification/service requirements taken in advance of the hearing on 9 July 2025.
13. The approach of Mr Justice Soole at the second annual review hearings for the 11 airports referred to above was to prefer to re-grant an injunction in favour of renewing (with amendment) the existing injunction. This was so that those affected by the injunction could more conveniently see its full terms in a single order. The draft Order accompanying this application accordingly is drafted in accordance with that approach.
14. For the benefit of the reader of this Application and any person potentially affected by it: all relevant documents concerning the Injunction and the second annual review hearing can be found at: <https://www.heathrow.com/company/local-community/injunction>

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

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

☒ No

Statement of Truth

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

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

Signature



- ☐ Applicant
- ☐ Litigation friend (where applicant is a child or a Protected Party)
- ☒ Applicant’s legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
3	07	2026

Full name

Rebecca Flynn

Name of applicant’s legal representative’s firm

Bryan Cave Leighton Paisner LLP

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

Associate

Applicant’s address to which documents should be sent.

Building and street

Governor’s House

Second line of address

5 Laurence Pountney Hill

Town or city

London

County (optional)

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Postcode

E	C	4	R	0	B	R

If applicable

Phone number

020 3400 4344

Fax phone number

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DX number

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Your Ref.

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Email

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