

A. Anonymity Application

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|----|---|-------------|
| 1. | N244 | A 1 - A 5 |
| 2. | Draft Order | A 6 - A 7 |
| 3. | 1st Witness Statement of Sharon Armour dated 23rd February 2026 | A 8 - A 9 |
| 4. | EXHIBIT SLA1 | A 10 |
| 5. | AWE Letter Exhibit SLA1 | A 11 - A 12 |
| 6. | Exhibit SLA2 Grounds for Anonymity Order | A 13 - A 18 |

Application notice

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

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Name of court	Claim no.
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)
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Warrant no. (if applicable)	
Claimant's name (including ref.)	
Defendant's name (including ref.)	
Date	

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

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

If you are a legal representative whom do you represent?

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

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

8. What level of Judge does your hearing need?

9. Who should be served with this application?

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

If necessary, please continue on a separate sheet.

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.

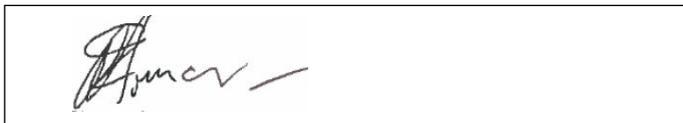
No

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

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Full name

--

Name of applicant's legal representative's firm

--

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

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Applicant's address to which documents should be sent.

Building and street

Second line of address

Town or city

County (optional)

Postcode

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If applicable

Phone number

Fax phone number

DX number

Your Ref.

Email

N THE HIGH COURT OF JUSTICE
IN THE MATTER OF PROCEEDINGS

BETWEEN:

WEST BERKSHIRE DISTRICT COUNCIL

Claimant

-and-

- (1) UK LAND HOLDINGS 1 LTD**
- (2) CAROLINE BERRY**
- (3) NORA CONNORS**
- (4) PATRICK FAGAN CONNORS**
- (5) JIMMY O'CONNORS**
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- (33) PATRICK STOKES**

Defendants

DRAFT ORDER

UPON READING an application notice by the Claimant in relation to one of its witnesses employed by AWE plc, Aldermaston” (“the Witness”).

AND UPON consideration of the Witness’s Article 8 right to respect for private and family life and the Article 10 right to freedom of expression.

AND UPON IT APPEARING that non-disclosure of the identity of the Witness is necessary in order to protect his/her interests.

AND PURSUANT to rule 39.2(4) of the Civil Procedure Rules and section II of the Contempt of Court Act 1981 and rules 5.4C and 5.4D of the Civil Procedure Rules.

IT IS ORDERED:-

1. That the identity of the Witness be not disclosed.
2. That the Witness be described in all statements of case and other documents to be filed or served in the proceedings and in any judgment or order in the proceedings and in any report of the proceedings by the press or otherwise as “Person AE” (or in other anonymised form as ordered).
3. That the address of the Witness be stated in all statements of case and other documents to be filed or served in the proceedings as AWE PLC, Room 20, Building F161.2, Atomic Weapons Establishment, Aldermaston, Reading England, RG7 4PR.
4. That reporting restrictions apply as to the disclosing of any information that may lead to the subsequent identification of the Witness. The publication of the name and address of the Witness or of any member of the Witness’s immediate family is prohibited.
5. That the Claimant do by _____ draw and file this Order and serve the same on the other parties.
6. That any non-party affected by this Order may apply on notice to all parties to have this Order set aside or varied.

Dated

Statement on behalf of the Claimant
Witness: Sharon Louise Armour
First Statement
Dated: 23RD February 2026
Exhibit: SLA1-2
CLAIM NO. KB-2025-004667

IN THE HIGH COURT OF JUSTICE
IN THE MATTER OF PROCEEDINGS

BETWEEN:

WEST BERKSHIRE DISTRICT COUNCIL

Claimant

-and-

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Defendants

WITNESS STATEMENT OF SHARON LOUISE ARMOUR

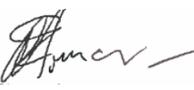
I, **SHARON LOUISE ARMOUR**, Solicitor (Legal Services Manager) at West Berkshire District Council, Market Street, Newbury RG14 5LD, **WILL SAY** as follows:

1. I am employed by the Claimant Council as a solicitor in the Legal and Democratic Services department. I have been employed by the Claimant since 2008.
2. As part of my role, I am responsible for the day-to-day conduct of this Claim.
3. I make this witness statement in support of the Claimant's application for an anonymity order on behalf of its expert witness, Person AE, in this Claim.
4. The grounds for the application are based on reasons of national security, as well as the protection of the safety and security of the Person AE, and are more particularly described in the Letter from AWE plc (the employer of Person AE) who is best placed to set out these grounds, shown at Exhibit SLA1 and the Grounds for Anonymity document, shown at Exhibit SLA2 which have been written in conjunction with AWE plc following AWE plc's request for anonymity of its employee, Person AE, as an expert witness for the Claimant.

DECLARATION

5. I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Dated: 23rd February 2026

Signed: 

Sharon Louise Armour

Statement on behalf of the Claimant
Witness: Sharon Louise Armour
First Statement
Dated: 23RD February 2026
Exhibit: SLA1-2
CLAIM NO. KB-2025-004667

IN THE HIGH COURT OF JUSTICE
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Claimant

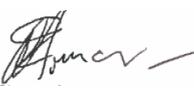
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Defendants

**EXHIBIT SLA1 TO THE WITNESS STATEMENT OF SHARON LOUISE
ARMOUR**

Dated: 23rd February 2026

Signed: 
Sharon Louise Armour

FAO Sharon Armour
Legal & Democratic Services
West Berkshire Council
Market Street
Newbury
RG14 5LD

Date 23/02/2026
Ref: AWE/EXEC/2026/SC/01

Dear Ms Armour

**REQUEST FOR ANONYMITY OF EXPERT WITNESS IN RESPECT OF INJUNCTION
CLAIM: NO. KB-2025-004667**

We write in respect of the above injunction claim to request the Council, as Claimant, applies to the Court for an anonymity order to anonymising the personal details (name and address) of the expert witness, who is an employee of AWE plc, and who will be providing expert witness evidence during the proceedings to support the Council as Claimant (the “**AWE Witness**”), in order to protect their identity.

Request for anonymisation

The AWE Witness is able to appear in person and give evidence at the hearing, therefore closed proceedings are not required. However, AWE’s security arrangements require that:

- the AWE Witness’ personal details be anonymised in their witness statement;
- their name be replaced with a pseudonym (i.e. ‘Person AE’).

AWE make this request by analogy to Civil Procedure Rule 39.2(4), which provides that the identity of any party or witness to court proceedings may, at the Court’s discretion, be held back where non-disclosure is necessary to secure the proper administration of justice and in order to protect the interests of that party or witness.

AWE's grounds for making this request in respect of the AWE Witness are based on reasons of national security, as well as the protection of the safety and security of the AWE Witness. In summary:

1. The AWE Witness has been employed by AWE since 2016. The fact that the AWE Witness has been employed by AWE since 2016 is not in the public domain.
2. The fact that the AWE Witness has been employed in their role means the witness has direct knowledge and has had access to highly sensitive information concerning the nuclear weapons programme carried out at AWE Aldermaston and AWE Burghfield.
3. The AWE Witness continues to work for AWE on various safety case matters.
4. If the AWE Witness had to reveal their name in their witness statement this would be the first public identification of them in this role.
5. Carrying out an open source (public domain) search of the AWE Witness does not identify that the witness has carried out this work for AWE. Revealing the witness' name would reveal the witness' home address and other personal details.

Disclosure of this information would be damaging to the interests of national security as well as prejudicial to the personal safety and security of the AWE Witness. Anonymising the AWE Witness' personal details and the use of a pseudonym in their witness statement, are proportionate responses to mitigate the risks to AWE, MOD and national security identified above and will ensure evidence can be considered in public.

AWE respectfully requests to anonymise the personal details of the AWE Witness and to use a pseudonym in their witness statement, as set out in this letter, are granted - for the reasons set out above.

Yours sincerely



Sarah Carter
Chief Legal Officer and Company Secretary

Statement on behalf of the Claimant
Witness: Sharon Louise Armour
First Statement
Dated: 23RD February 2026
Exhibit: SLA1-2
CLAIM NO. KB-2025-004667

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IN THE MATTER OF PROCEEDINGS

BETWEEN:

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Defendants

**EXHIBIT SLA2 TO THE WITNESS STATEMENT OF SHARON LOUISE
ARMOUR**

Dated: 23rd February 2026

Signed: 
Sharon Louise Armour

IN THE HIGH COURT OF JUSTICE
IN THE MATTER OF PROCEEDINGS

BETWEEN:

WEST BERKSHIRE DISTRICT COUNCIL

Claimant

-and-

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Defendants

GROUNDS OF APPLICATION FOR AN ANONYMITY ORDER

INTRODUCTION

1. By these Grounds of Application, the Claimant seeks an anonymity order to protect the identity of its expert witness in this Claim (known as Person AE).
2. The grounds for the application are based on reasons of national security, as well as the protection of the safety and security of Person AE.
3. The Claimant recognises the importance of the open justice principle. However, for the reasons explained below, there are important reasons why, in the public interest and for the security of Person AE, an anonymity order is necessary in the present case to protect both the interests of national security and the personal safety and security of the witness. In addition, and to the best of my knowledge, nothing turns on the specific identity of Person AE. The making of such an order would not cause prejudice to any party involved in this claim. There is no wider interest in the identification of Person AE.

BACKGROUND

4. Person AE is an employee of AWE plc (“AWE”) and is authorised on behalf of AWE to provide a witness statement in support of the Claimant’s Claim. AWE is a Non-Departmental Public Body, wholly owned by the Ministry of Defence (“MOD”), and operator of two nuclear licensed sites at Aldermaston and Burghfield. These sites are critical to UK defence and the delivery of the Continuous At Sea Deterrent (“CASD”). They are the only sites in the UK which design, manufacture, maintain, and when required, disassemble our nuclear warheads. They are unique and irreplaceable sites, and their long-term operability must be ensured.
5. Information about the radioactive and explosive materials held at AWE Aldermaston and AWE Burghfield and the purposes for which they are held is classified and subject to strict security controls. The Radiation (Emergency Preparedness and Public Information) Regulations 2019 (“REPPPIR 2019”) requires the evaluation of potential hazards at AWE Burghfield and AWE Aldermaston which might result in a radioactive release, and the assessment of the consequences of such a release. The hazard evaluations and consequence assessments contain highly sensitive material, available only to a very restricted number of people and are marked at “Secret Atomic” level.
6. The Claimant’s evidence to the Claim concerns the application of REPPPIR 19 and development within the detailed emergency protection zone (“DEPZ”). Assessments of a military nuclear site are required to understand how to apply REPPPIR 19 and why a potential hazard could occur. The individuals involved in these assessments have access to highly sensitive information concerning the nature and quantity of material and weapons on site, the risks associated with the material and weapons, and the consequences of those risks eventuating.
7. Matters relating to the design and security of military nuclear sites and the weapons and material located there are not made public.
8. The grounds for making this anonymity request in respect of Person AE are based on reasons of national security, as well as the protection of the safety and security of Person AE. In summary:

- 8.1. Person AE has been employed by AWE since 2016. The fact that Person AE has been employed by AWE since 2016 is not in the public domain.
- 8.2. The fact that Person AE has been employed in their role means the witness has direct knowledge and has had access to highly sensitive information concerning the nuclear weapons programme carried out at AWE Aldermaston and AWE Burghfield.
- 8.3. Person AE continues to work for AWE on various safety case matters.
- 8.4. If Person AE had to reveal their name in their witness statement this would be the first public identification of them in this role.
- 8.5. Carrying out an open source (public domain) search of the expert witness does not identify that the witness has carried out this work for AWE.

LEGAL FRAMEWORK

The Test in CPR 39.2(4)

9. CPR 39.2(4) provides that the Court must order that the identity of any party or witness shall not be disclosed if, and only if, it considers non-disclosure necessary to secure the proper administration of justice and in order to protect the interests of that party or witness.

FOUNDATIONS

Introduction

10. The non-disclosure of Person AE is considered necessary in the present case in order to secure the proper administration of justice and in order to protect the interests of Person AE. That is because of the risk to national security, and to the personal safety and security of Person AE, which disclosure of their identity would otherwise cause.
11. The assessment of the nature and seriousness of the risk to national security as well as prejudicial to the personal safety and security of the AWE witness. The use of a pseudonym in their proof of evidence, are proportionate responses to mitigate the risks to AWE, MOD and national security identified above and will ensure evidence can be considered in public.
12. There exist states (both nuclear and non-nuclear), quasi-state actors, organisations, organised crime groups, and individuals who are hostile to the interests of the United Kingdom. Some of those states, organisations and individuals, and organisations and individuals who work for them, wish to gain knowledge and information about the United Kingdom's nuclear weapons capability and systems. This includes the perceived strengths and weaknesses of that capability and those systems. Some of those actors are sophisticated, have considerable resources and are able to use specialised means to do so. They are highly motivated to acquire such knowledge and information and will go to very considerable lengths to do so.
13. Against that background, the assessment has been made that there is a real risk that any judgment in this claim will be reviewed by some of these actors. Informed hostile actors would be well-placed to understand the information in question.
14. Person AE has access to a range of very tightly controlled information relating to the quantities of special nuclear materials in facilities across AWE Burghfield and AWE Aldermaston, procedures for the secure and safe handling and storage of those materials, the design of nuclear weapon sites, some knowledge of nuclear weapon design and related matters of national security. In short, Person AE holds, and has access to, a wide range of information

which would be of very considerable interest to the states, organisations and individuals referred to above, whose interests are adverse to those of the UK. Those actors would have a strong interest in acquiring that information; could go to considerable lengths to obtain it; and it is assessed that there is a real risk that they will do so.

15. Person AE's identity in their current role is not public. As such, it is imperative that their identity remains secret. If it were to be known, this would create two main strands of risk.
16. First, there would be a very considerable risk to national security. Actors with interests adverse to those of the UK would have a publicly available source of information confirming the identity of an individual closely involved in the sensitive aspects of the UK's nuclear weapons programme. The risks associated with such a state of affairs are self-evident. It is known that approaches are made by hostile states and non-state actors to individuals who work in defence-related matters in NATO states. Such approaches could be overt, but, equally, the identification of the expert witness would provide a target for covert means of intelligence gathering. The fact that risks to national security are, in principle, a good basis on which to depart from the open justice principle is well-established at the highest level: *Dring v. Cape Intermediate Holdings Ltd* [2020] AC 629, *per* Lady Hale at [46], held to be generally applicable to derogations from the open justice principle *per* Nicklin J in *Lupu v. Rakoff* [2019] EWHC 2525 (QB), [2020] EMLR 6, at [27].
17. Secondly, the identification of Person AE would give rise to a direct personal risk to their safety and security. As set out above, hostile actors could go to considerable lengths to obtain the information that the expert witness holds and to which they have access. Some of the means available to them would put the personal safety and security of the expert witness, and their family and friends, at considerable risk.
18. There are good reasons why it is longstanding policy that levels of security clearance are never publicly stated on social media and similar, as it is known that this increases the threat level to individuals and the national interest. The particular circumstances in this case make this a risk with significant potential repercussions.
19. There is a real need for Person AE's identity not to be disclosed, both in order to protect the interests of national security, as well as to protect their own personal security and safety. The evidence establishes more than a speculative possibility that the witness's identity may cause them some embarrassment and damage to reputation, of a kind that is inherent in a person's involvement in litigation. It establishes a real risk of serious harm to the well-recognised public interest in the protection of national security, as well as to Person AE personally.
20. It is the Claimant's case that the balance plainly comes down in favour of the grant of anonymity for Person AE. The public interest in protecting national security, and the witness' personal interest in protecting their safety and security, requires their identity to be withheld. The factors weighing in favour of non-disclosure of Person AE's identity are strong.
21. In addition, it is important to note that AWE's position on the anonymity of Person AE is consistent with United Kingdom government policy that individuals who work in this area must take a range of proactive and precautionary steps so that attention is not drawn to them

in their professional or their personal life. This assists in preserving the national security of the United Kingdom and reduces the personal risk to them or members of their family.

22. Furthermore, the nature of the risk in question means that Person AE's own rights and interests under Article 8 ECHR (and, given the safety risks involved, also Articles 2 and 3 ECHR) are engaged. That means that the matter is not one of judicial discretion, but rather of obligation under section 6 HRA.
23. For all these reasons, the balance weighs heavily in favour of non-disclosure of Person AE's identity. Person AE's evidence is important and is not replicated elsewhere. The risk to national security and to Person AE's personal safety and security are powerful factors, against that background, which weigh in favour of anonymity.

CONCLUSION

24. For all these reasons, the test in CPR 39.2(4) is met. First, non-disclosure is necessary to secure the proper administration of justice. Person AE is best placed to give evidence to the court, given the witness's involvement with the matters in dispute. Secondly, non-disclosure is necessary to protect the interests of AWE and of Person AE. The strong public interest in protecting national security, particularly as regards matters relating to nuclear weapons, as well as Person AE's personal safety and security, can only be protected by a grant of anonymity.
25. No other steps are sought by way of this application. Person AE clearly identifies their qualifications and experience in their statement, so the other parties to the claim will be able to review those matters and, if so advised, make appropriate submissions. The identity of Person AE is not required to enable them to do that and is, indeed, irrelevant to any of the matters in dispute. There is no prejudice to any of the parties to the case. In reality, the making of an anonymity order would not, in the particular circumstances of the present case, impact in any material way on the openness of the proceedings.
26. For these reasons an Order is sought in the attached terms anonymising the expert witness so that the individual is referred to only as "Person AE".

23 February 2026