IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NOS: KB-2024-1765
KB-2024-2132
KB-2024-2317
KB-2024-2473

B E T W E E N

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.**
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Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport Claim No: KB – 2024 - 002473		**Date**	**Page No.**
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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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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-lbal01saas99pjip001.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

CLAIM NO: KB-2024-001765

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

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Amended pursuant to the Order of Bourne J dated 24 June 2025

Claim Form

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 – –

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.

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

HIGH COURT OF JUSTICE SEAL 12 Jun 2024 QUEEN'S BENCH DIVISION

KB-2024-001765

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.

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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	0 6	2 0 2 4

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

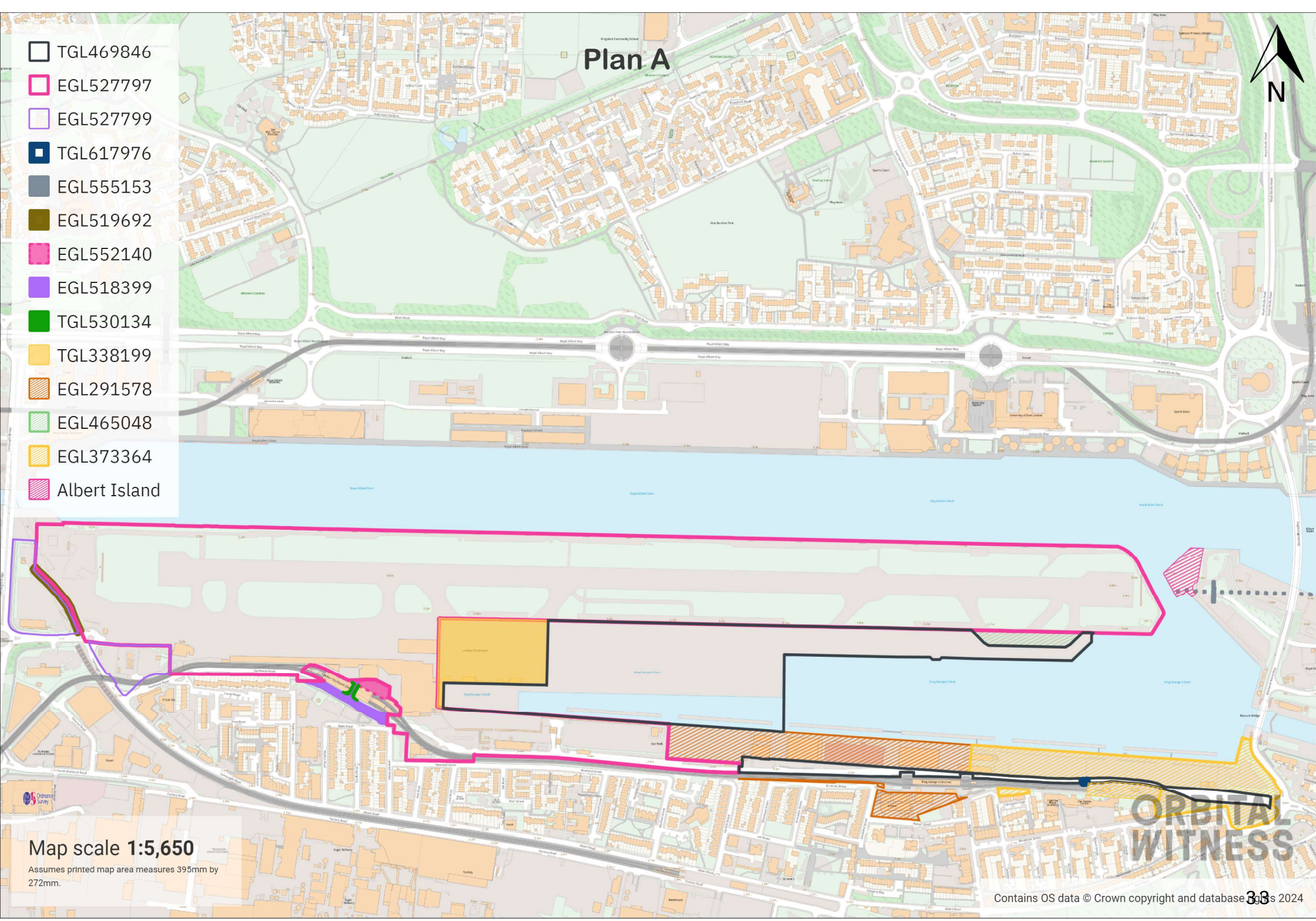
DX number

Your Ref.

WortleyS/292659.000057

Email

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


Plan A
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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
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Amended pursuant to the Order of Bourne J dated 24 June 2025

Plan 1

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

N

Map scale **1:5,650**

Assumes printed map area measures 395mm by 272mm.

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ORBITAL WITNESS

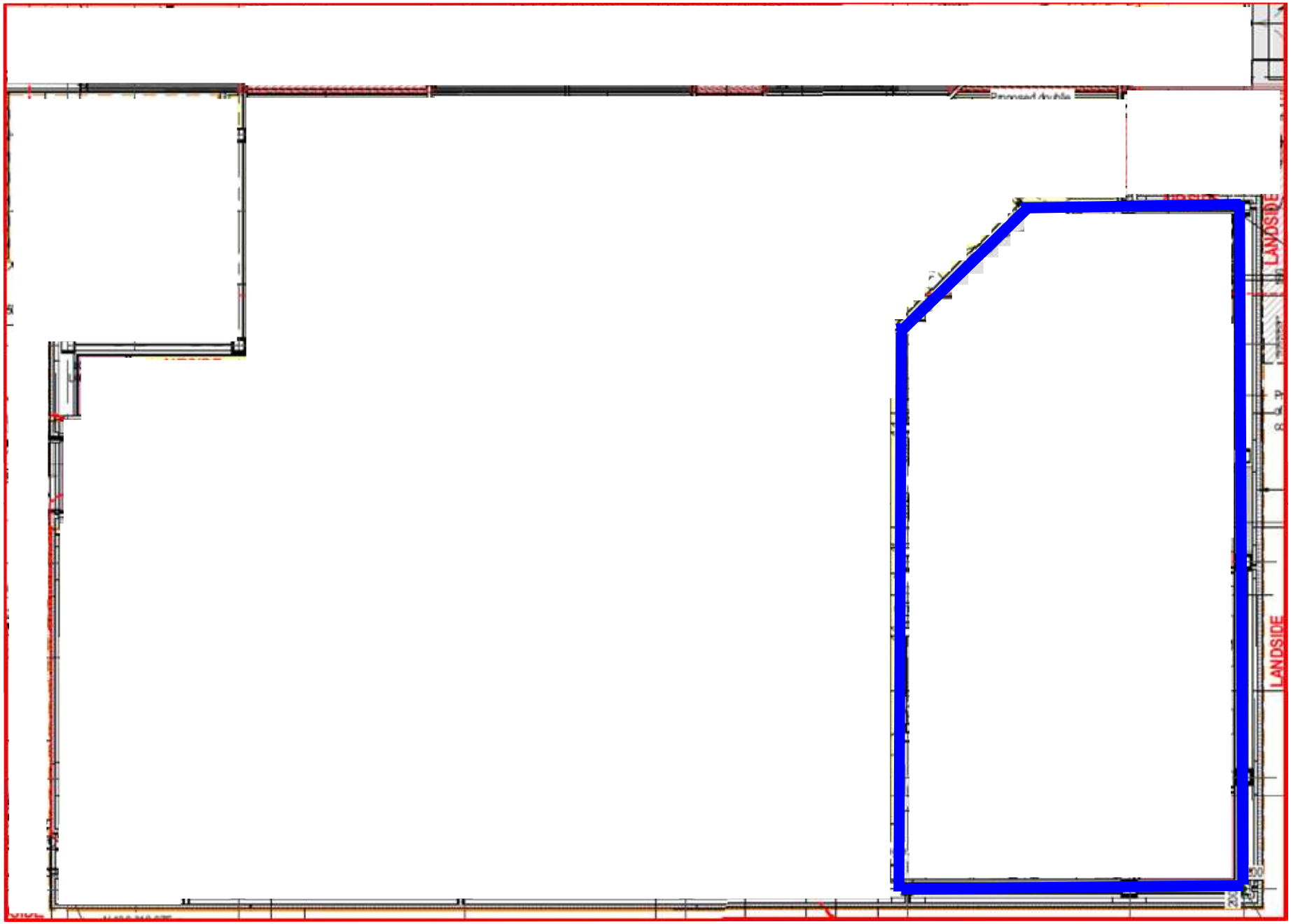
Main Terminal - Ground Floor

Plan 2



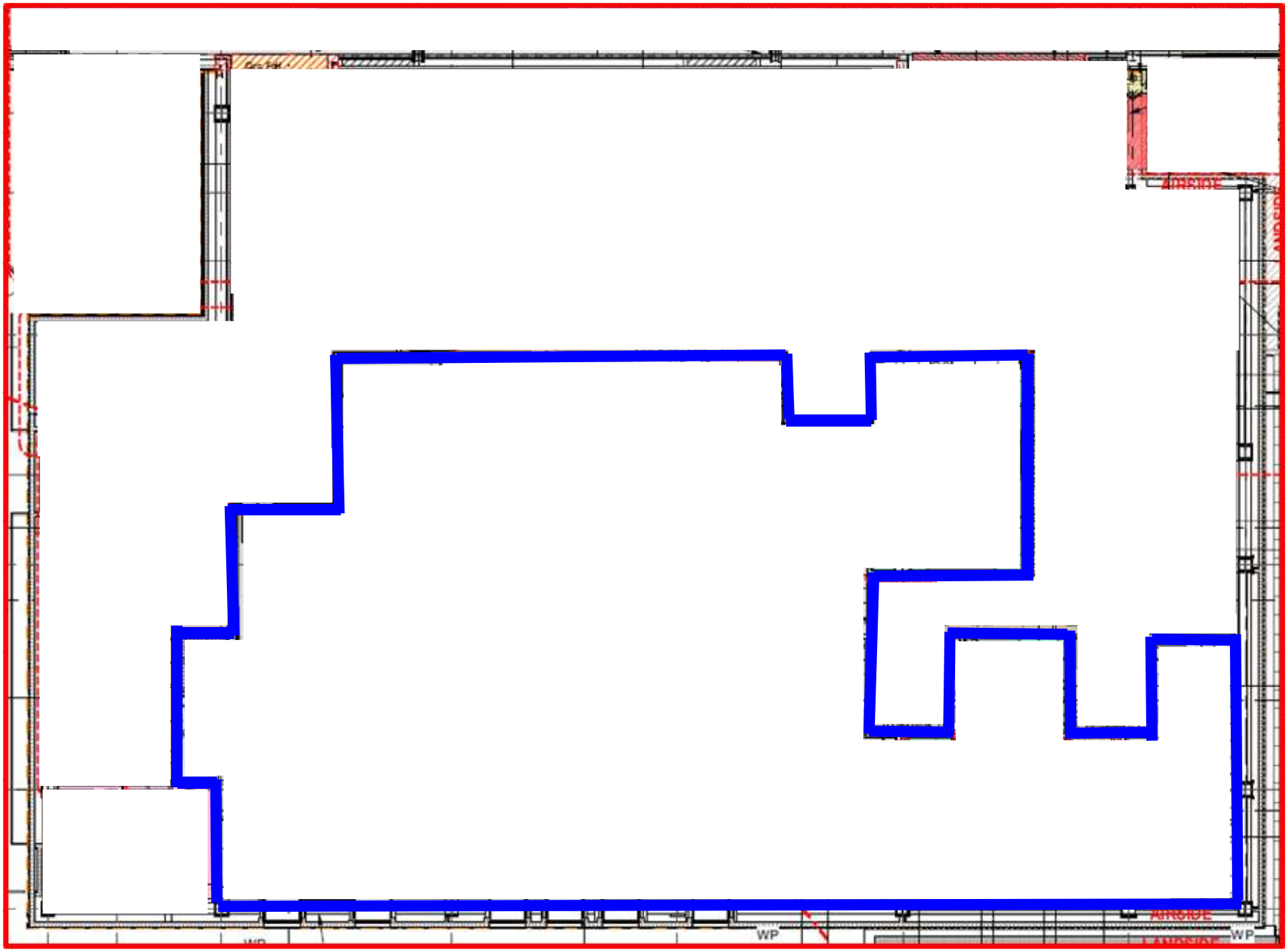
Terminal Immigration Facilities - Ground Floor

Plan 3



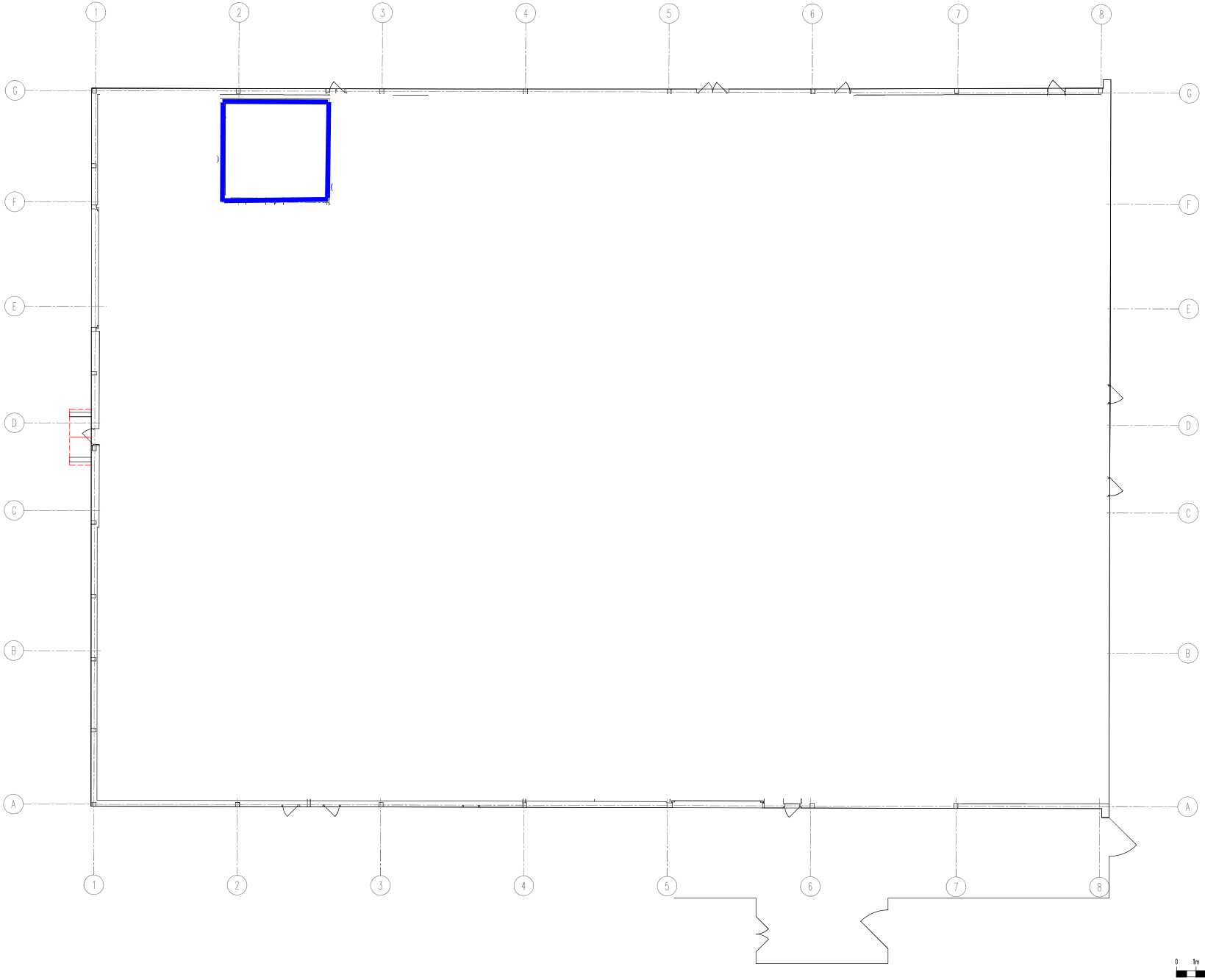
Terminal Immigration Facilities - First Floor

Plan 4



Blue Shed - Ground Floor

Plan 5



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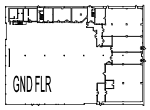
SCALE BAR 1:100 @ A1

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:

Rev	Change	Date
B	Room Numbers Added	01/11/18
A	Door Numbers Added	01/03/16



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

RECORD DRAWING

Title
BLUE SHED

Drawing Title
Ground Floor
General Arrangement Plan

Date	Drn By	Chk By	Appvd
04/08/15	VR	-	-

Drawing Number R/BS/G/8001 Rev B

Scale 1:100

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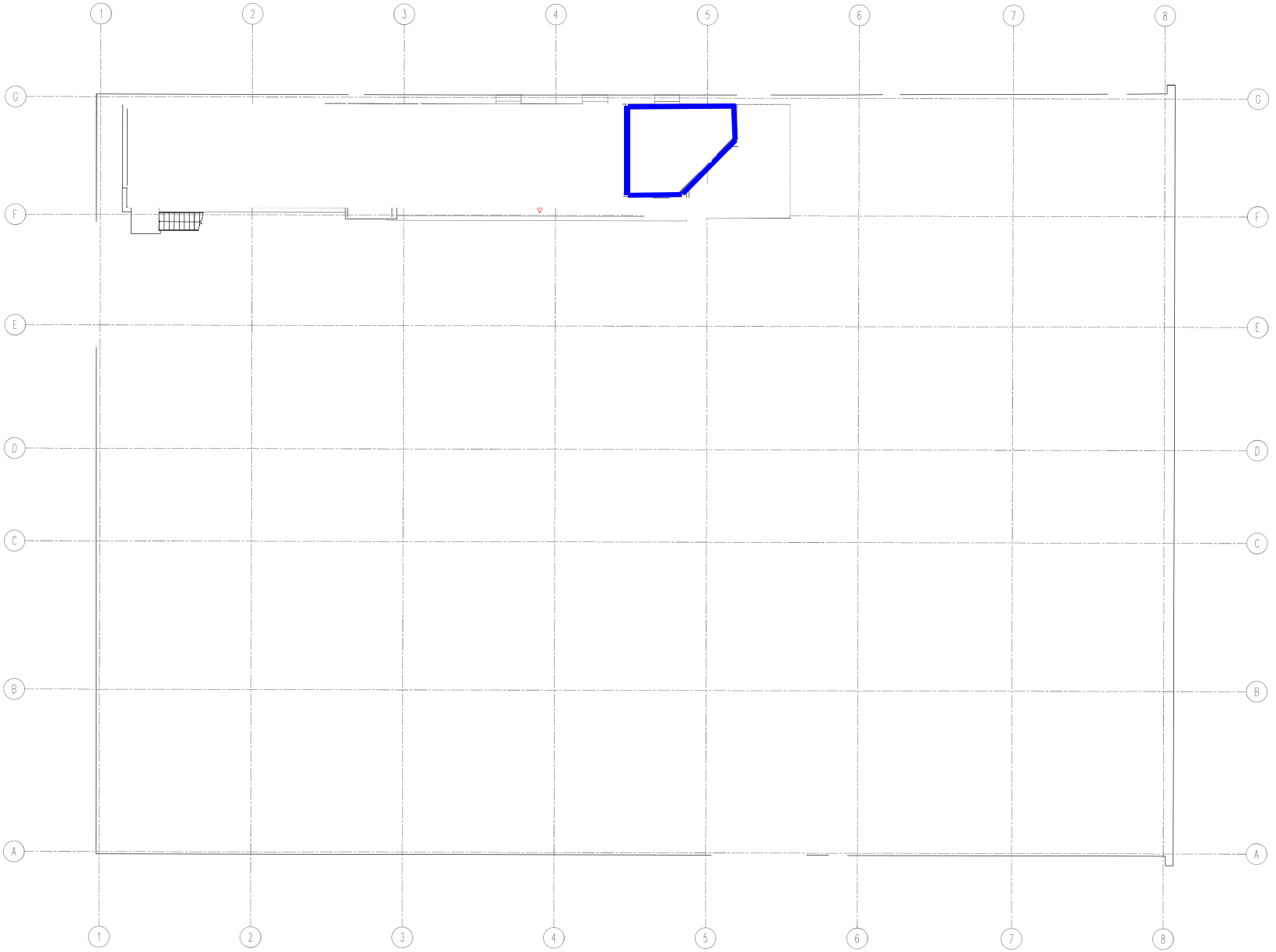
A1

Printed on: November 1, 2018 - 1:23PM C:\Users\Cartabrien\Documents\CartaBrien\LONDON CITY AIRPORT\Record Drawings\Blue Shed\Ground Floor\R_BS_G_GROUND FLOOR COORDINATED Rev B.dwg

Blue Shed - First Floor

Plan 6



0 1m 2m 3m 4m 5m

SCALE BAR 1:100 @ A1

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:

LEGEND

X/XXX FIRE DOOR

X/XXX STANDARD DOOR

Rev	Change	Date
B	Room Numbers Added	01/11/18
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

Title
BLUE SHED

Drawing Title
First Floor
General Arrangement

Date	Dn By	Ck By	Appd
04/08/15	VR	-	-

Drawing Number R/BS/3/A001 Rev B

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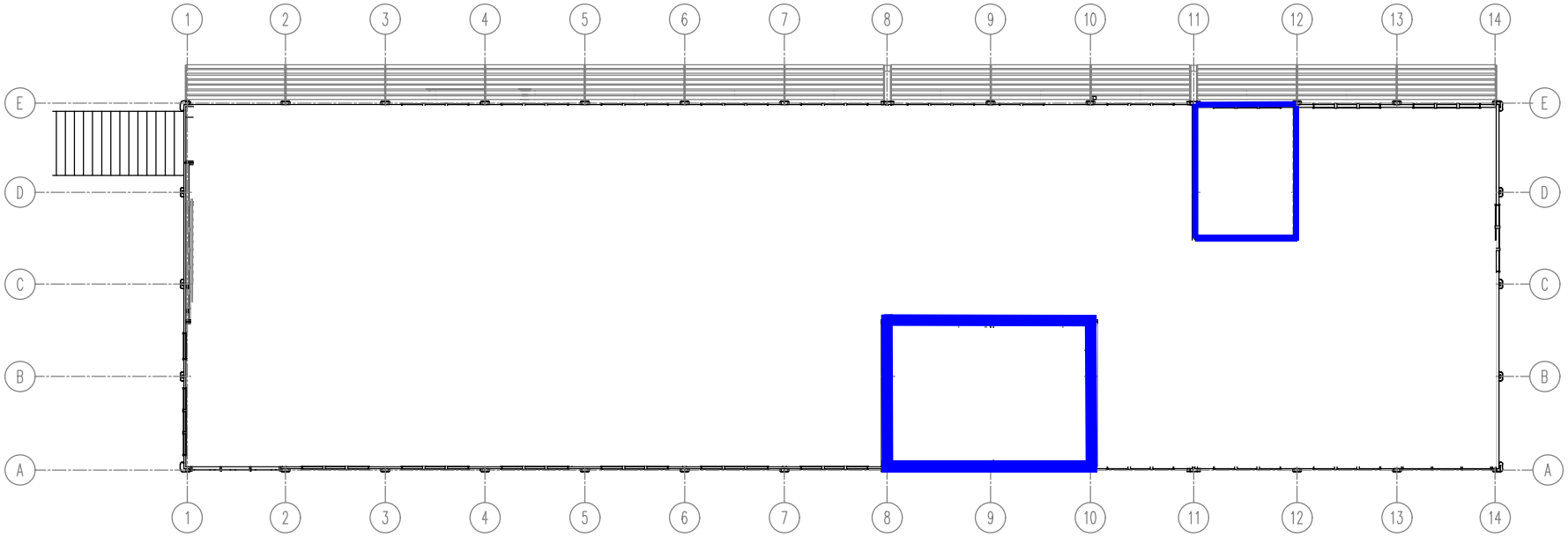
Scale 1:100

A1

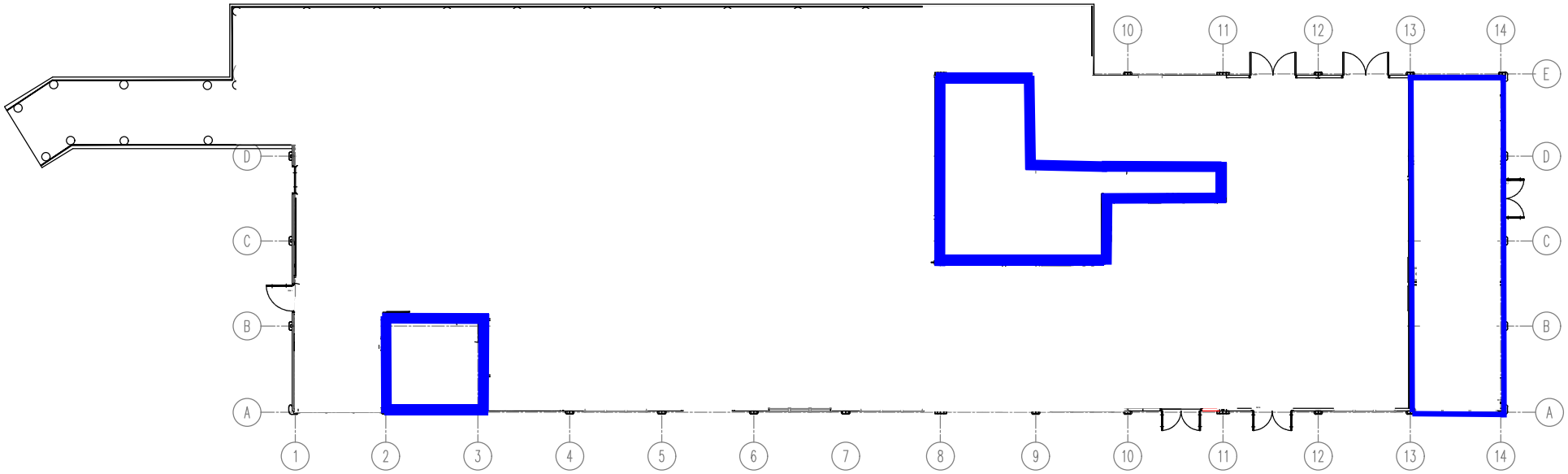
Printed on: November 1, 2018 - 1:34PM C:\Users\Cartabrien\Documents\CartaBrien\LONDON CITY AIRPORT\Record Drawings\Blue Shed\1st FloorR_BS_3_A_FIRST FLOOR COORDINATED Rev A.dwg

Plan 7

Jet Centre - Ground Floor



Jet Centre - First Floor



0 0.75m 1.5m 2.25m 3.0m 3.75m

SCALE BAR 1:75 @ A1

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:

LEGEND

X/XXX Fire Door

X/XXX Standard Door

Rev	Change	Date
E	Room Numbers Added	16/08/18
D	Layout amended	19/04/18
C	04/04/18	04/03/16
B	Door Numbers Added	04/03/16
A	Modified as indicated	12/06/15

G-1 FLRS

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

RECORD DRAWING

Site
JET CENTRE

Drawing Title
Ground to First Floor
General Arrangement Plan

Date	Drn By	Chk By	Appvd
24/07/15	VR	-	-

Drawing Number R/JC/A/A/001 Rev E

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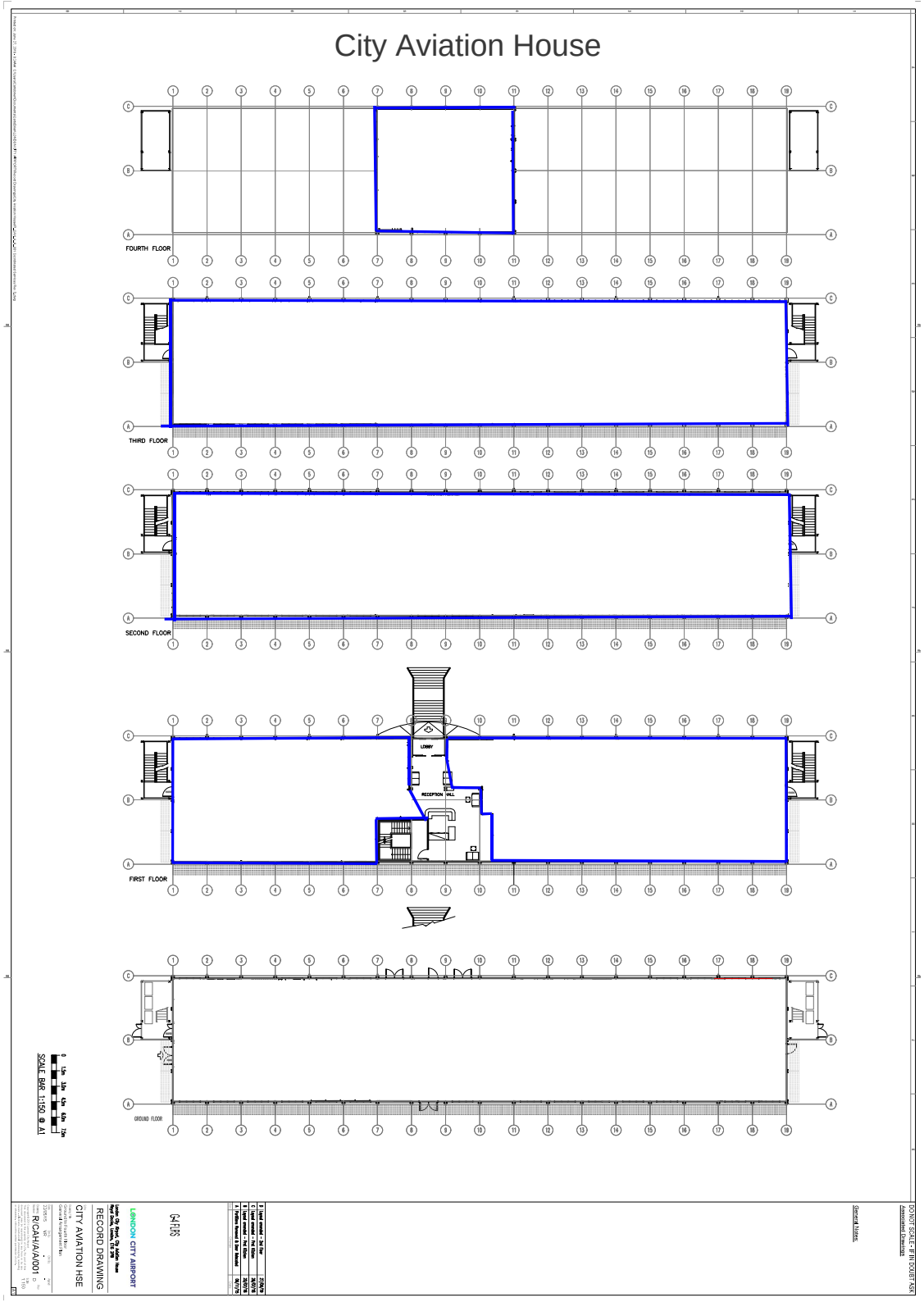
Plan 8


City Aviation House
FOURTH FLOOR
THIRD FLOOR
SECOND FLOOR
FIRST FLOOR
GROUND FLOOR
LOBBY
RECEPTION HALL
SCALE BAR 1:150 @ A1
LONDON CITY AIRPORT
RECORD DRAWING
CITY AVIATION HSE
R/CAH/A/A/001

IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION

CLAIM NO:

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/tZIoduqpqTMtE9dgMMhlaymvEZgO45jgJ19A)*
>
> *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): "N*o 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.

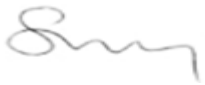
YAASER VANDERMAN

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

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

KB-2024-001765

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

Plan 1

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

X Notice locations

N

Map scale **1:5,650**

Assumes printed map area measures 395mm by 272mm.

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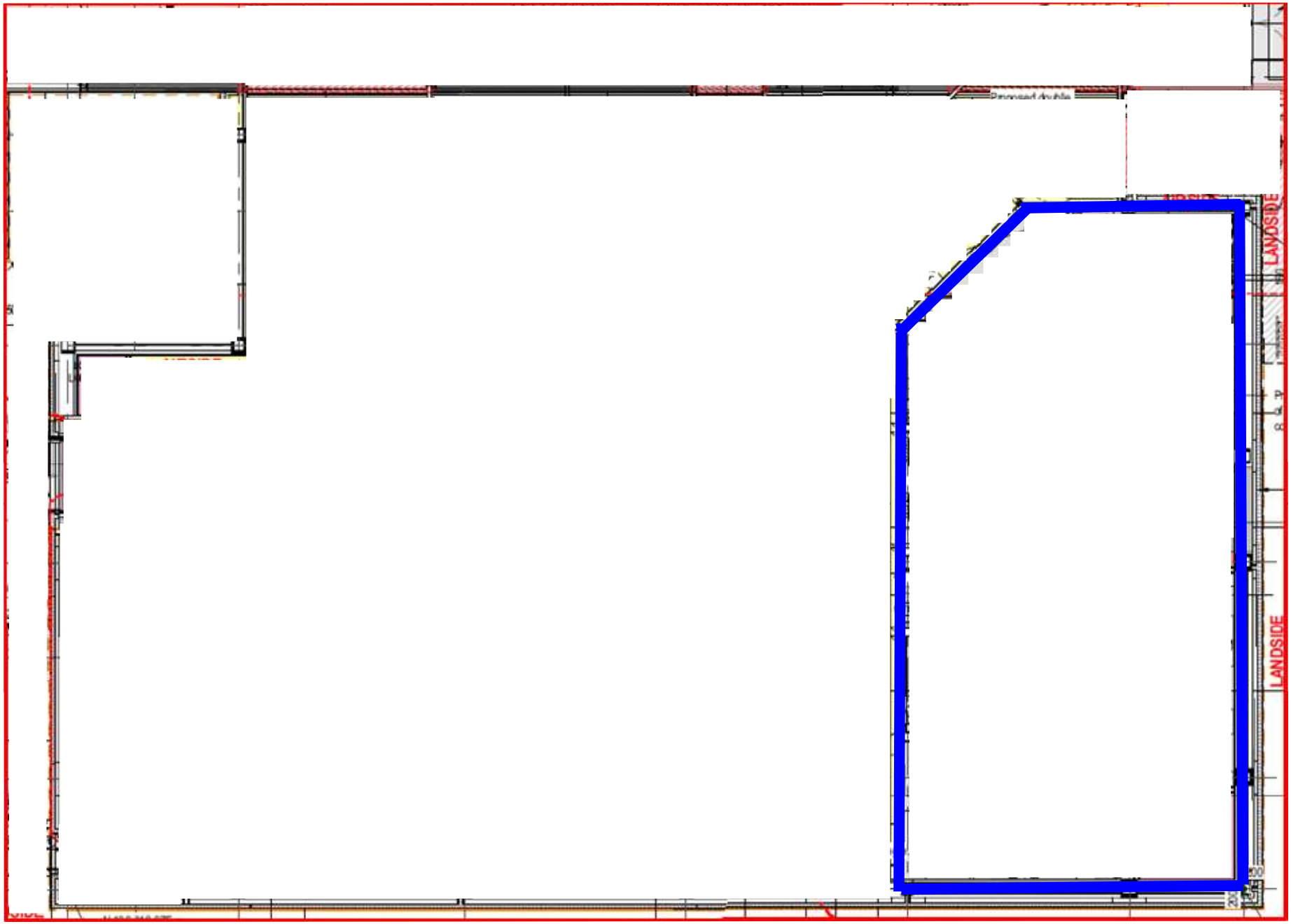
Main Terminal - Ground Floor

Plan 2



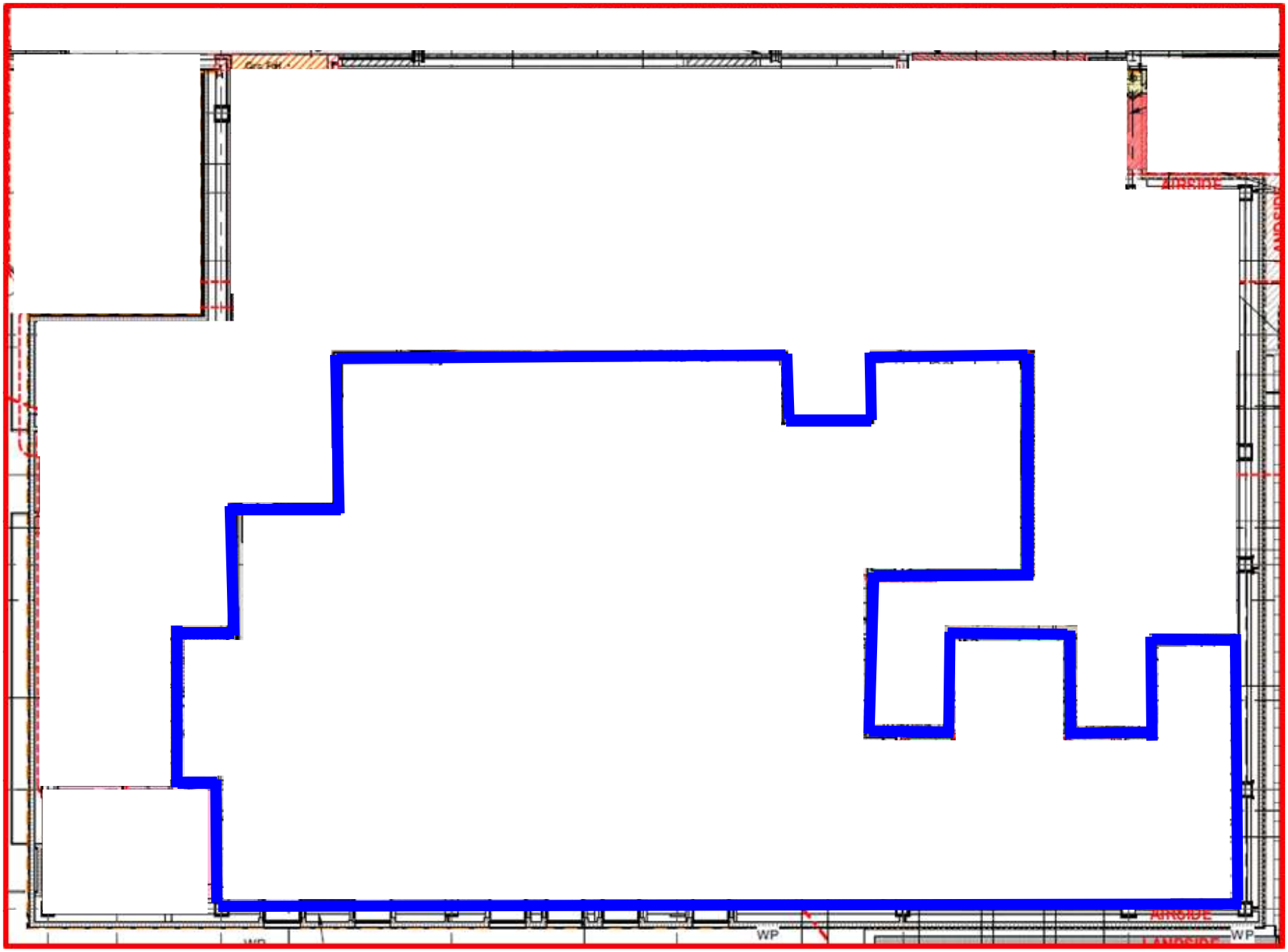
Terminal Immigration Facilities - Ground Floor

Plan 3



Terminal Immigration Facilities - First Floor

Plan 4



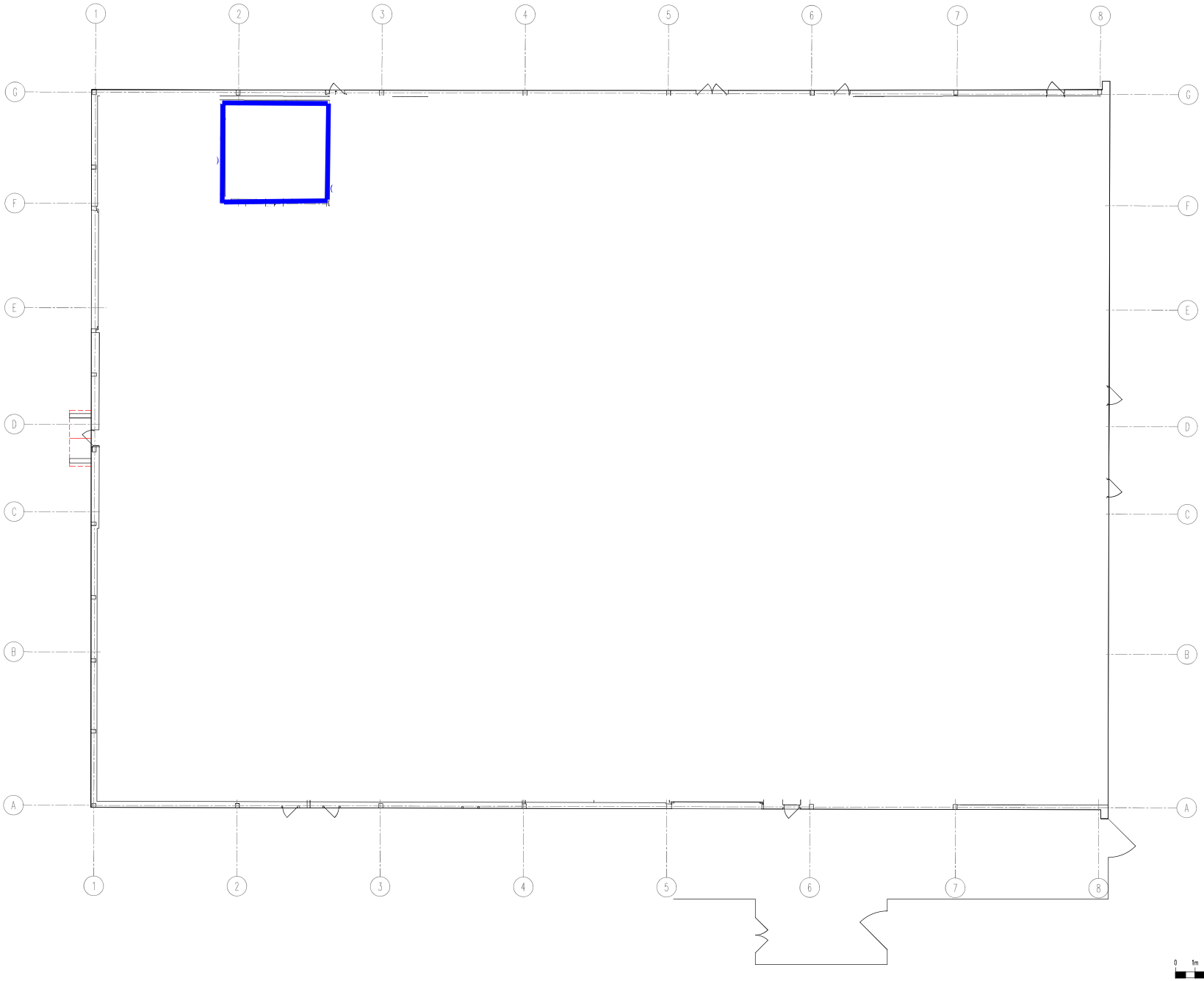
Blue Shed - Ground Floor

Plan 5

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:



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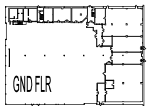
SCALE BAR 1:100 @ A1

Rev	Change	Date
B	Room Numbers Added	01/11/18
A	Door Numbers Added	01/03/16



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

RECORD DRAWING

Title
BLUE SHED

Drawing Title
Ground Floor
General Arrangement Plan

Date	Drn By	Chk By	Appvd
04/08/15	VR	-	-

Drawing Number R/BS/G/2001 Rev B

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Scale 1:100

A1

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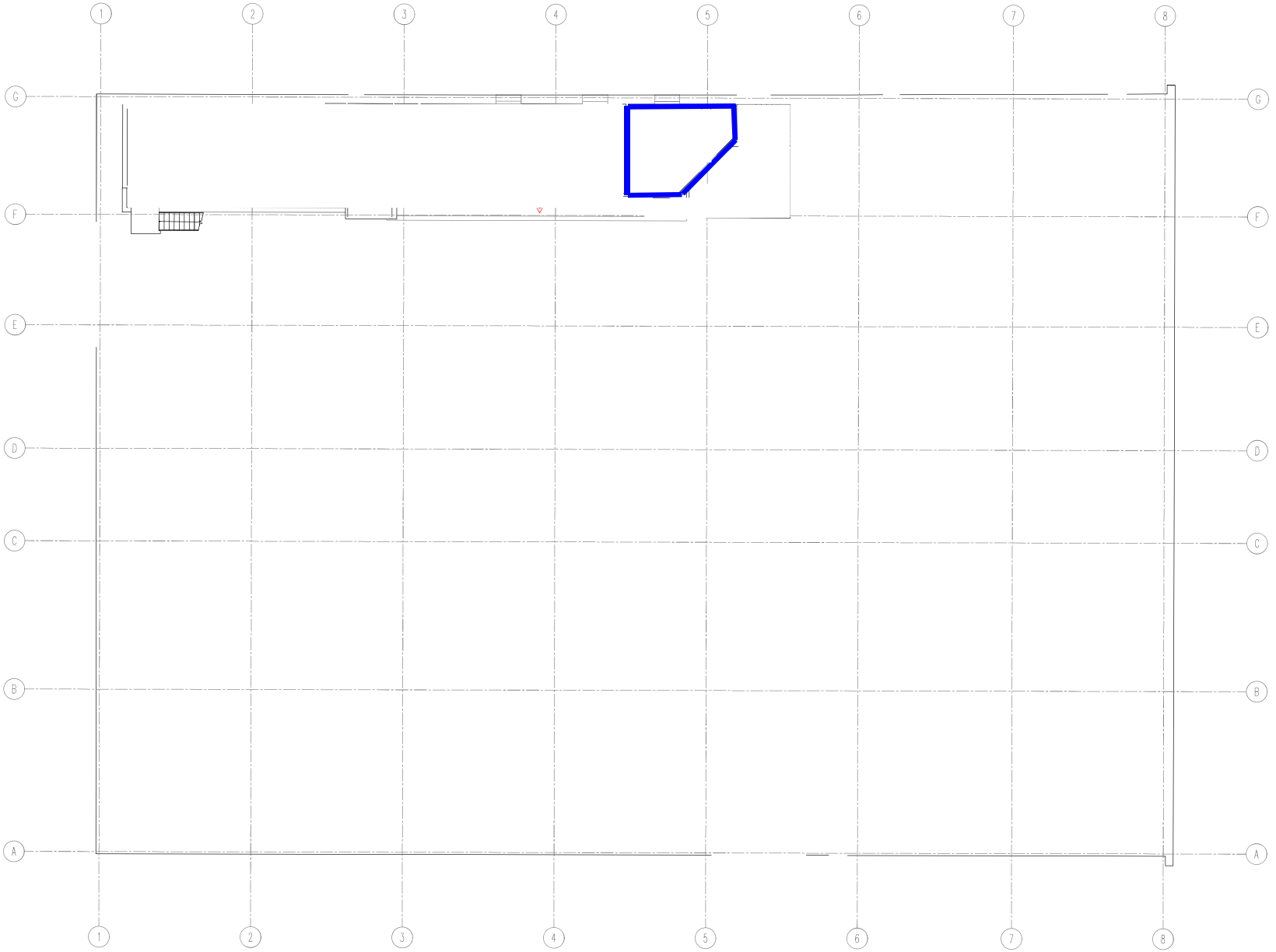
Blue Shed - First Floor

Plan 6



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SCALE BAR 1:100 @ A1

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:

LEGEND

X/XXX FIRE DOOR

X/XXX STANDARD DOOR

Rev	Change	Date
B	Room Numbers Added	01/11/18
A	Door Numbers Added	01/03/16



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

RECORD DRAWING

Title
BLUE SHED

Drawing Title
First Floor
General Arrangement

Date	Drn By	Chk By	Appvd
04/08/15	VR	-	-

Drawing Number R/BS/6/A3001 Rev B

Scale 1:100

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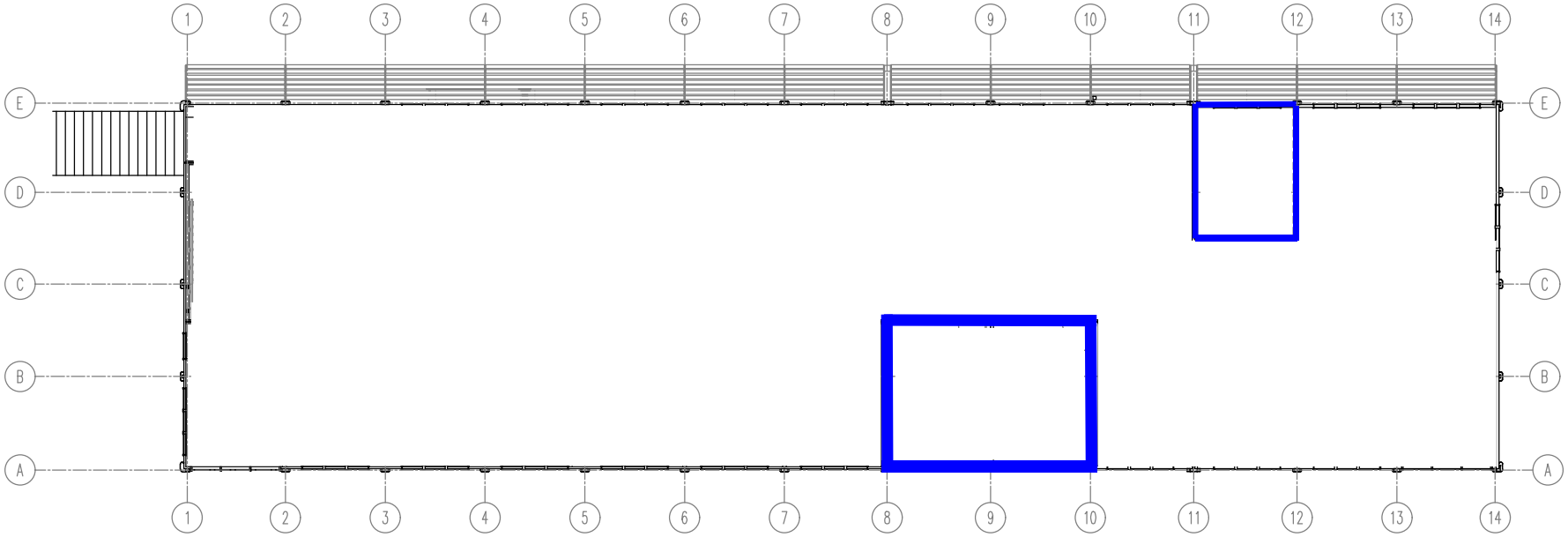
A1

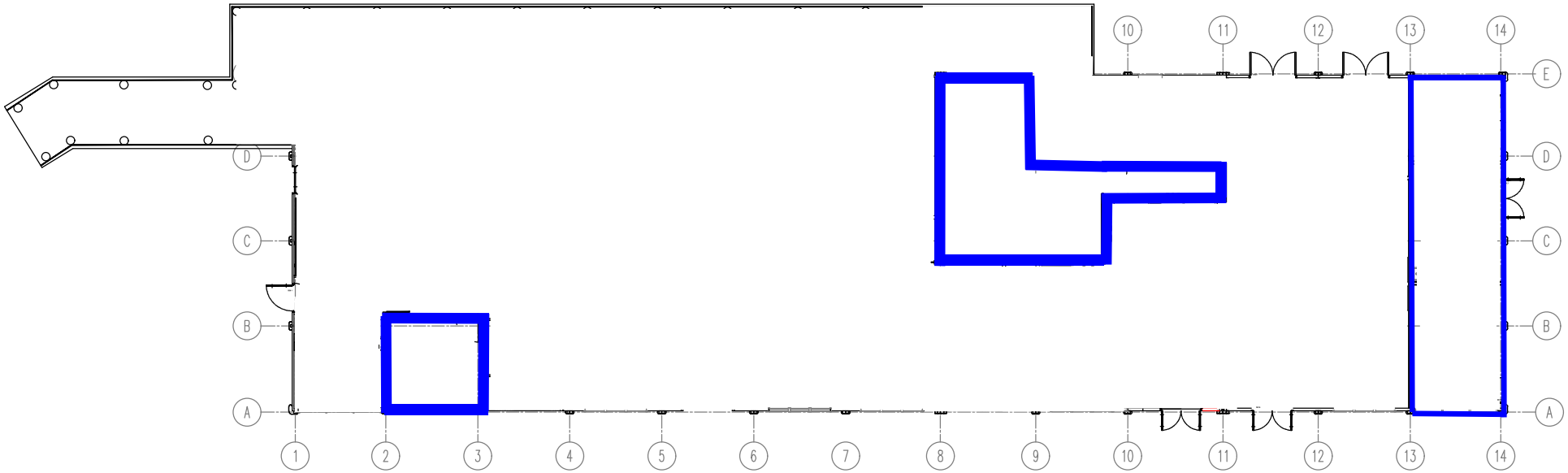
Printed on: November 1, 2018 - 1:34PM C:\Users\Cartabrian\Documents\CartaBrian\LONDON CITY AIRPORT\Record Drawings\Blue Shed\1st FloorR_BS_1_A_FIRST FLOOR COORDINATED Rev A.dwg

Plan 7

Jet Centre - Ground Floor



Jet Centre - First Floor



0 0.75m 1.5m 2.25m 3.0m 3.75m

SCALE BAR 1:75 @ A1

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:

LEGEND

X/XXX Fire Door

X/XXX Standard Door

Rev	Change	Date
E	Room Numbers Added	16/08/18
D	Layout amended	19/04/18
C	04/04/18	04/03/16
B	Door Numbers Added	04/03/16
A	Modified as indicated	12/06/15

G-1 FLRS

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

RECORD DRAWING

Site
JET CENTRE

Drawing Title
Ground to First Floor
General Arrangement Plan

Date	Drn By	Chk By	Appvd
24/07/15	VR	-	-

Drawing Number R/JC/A/A/001 Rev E

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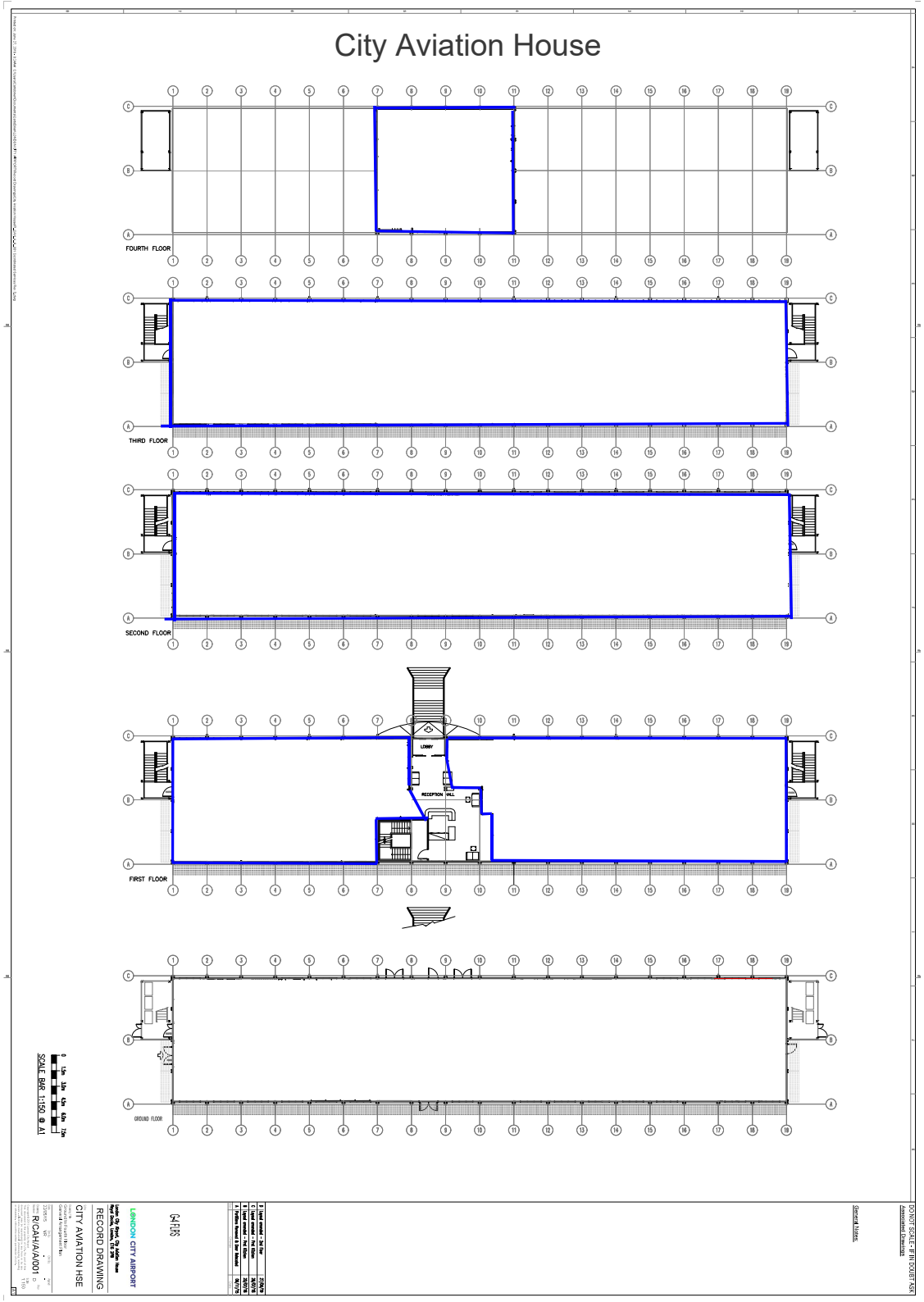
Scale 1:75

A1

Printed on: August 18, 2016 - 11:14AM C:\Users\CartoBrien\Documents\CartoBrien\LONDON CITY AIRPORT\Record Drawings\Jet Centre\R_JC_A_A_001 Coordinated Services Rev D.dwg

Plan


City Aviation House
FOURTH FLOOR
THIRD FLOOR
SECOND FLOOR
LOBBY
RECEPTION WALL
FIRST FLOOR
GROUND FLOOR
SCALE BAR 1:150 @ A1
CITY AVIATION HSE
RECORD DRAWING
LONDON CITY AIRPORT
DO NOT SCALE - IF IN DOUBT ASK
Associated Dimensions
General Notes

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

CLAIM NO: KB-2024-001765

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.

.....

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 is 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 junction.

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 is 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.

Claim no: KB-2024-001765

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

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

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 **CLAIM NO: KB-2024-001765**
KINGS BENCH DIVISION

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

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:

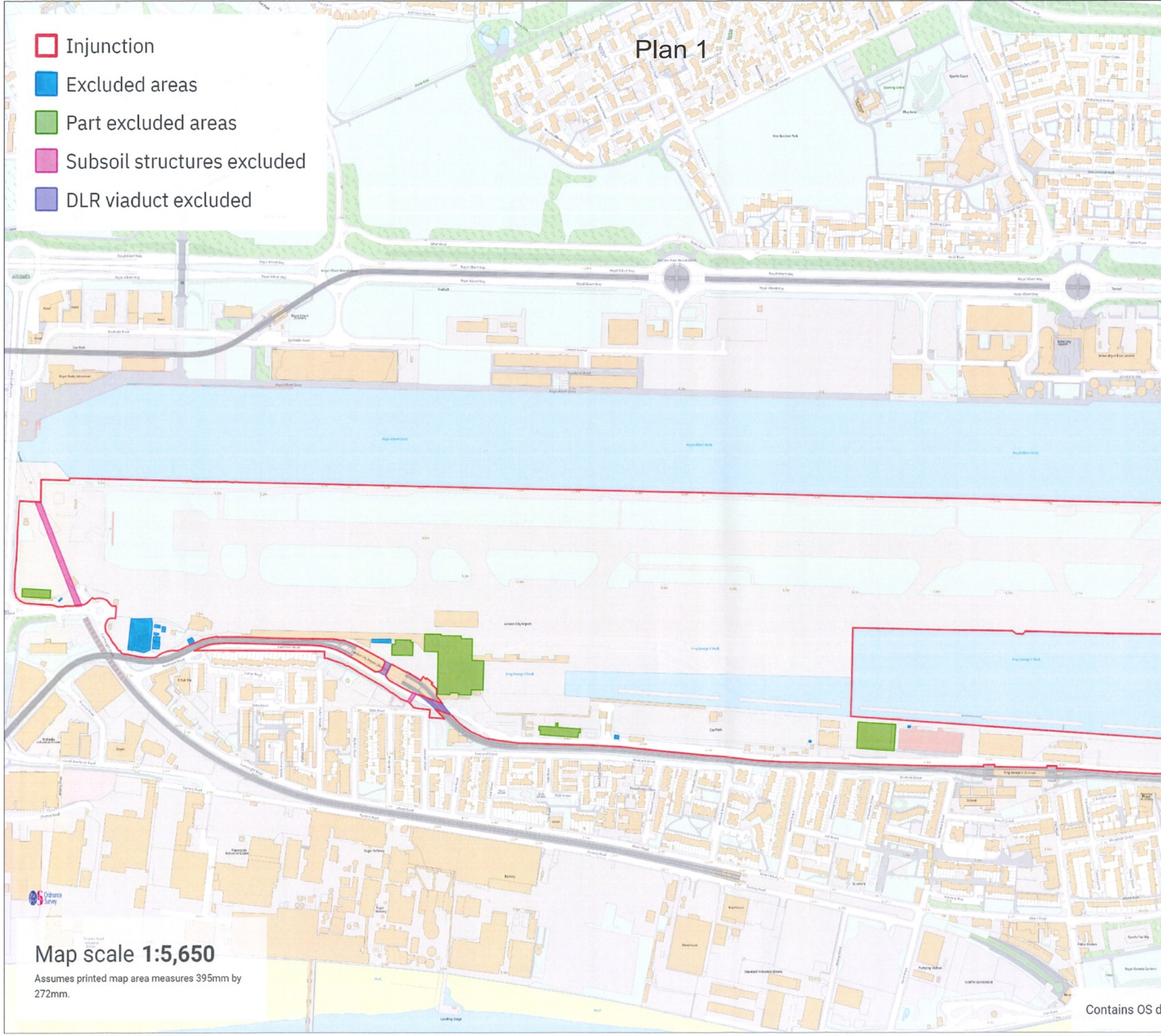
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

Dated: 20 June 2024

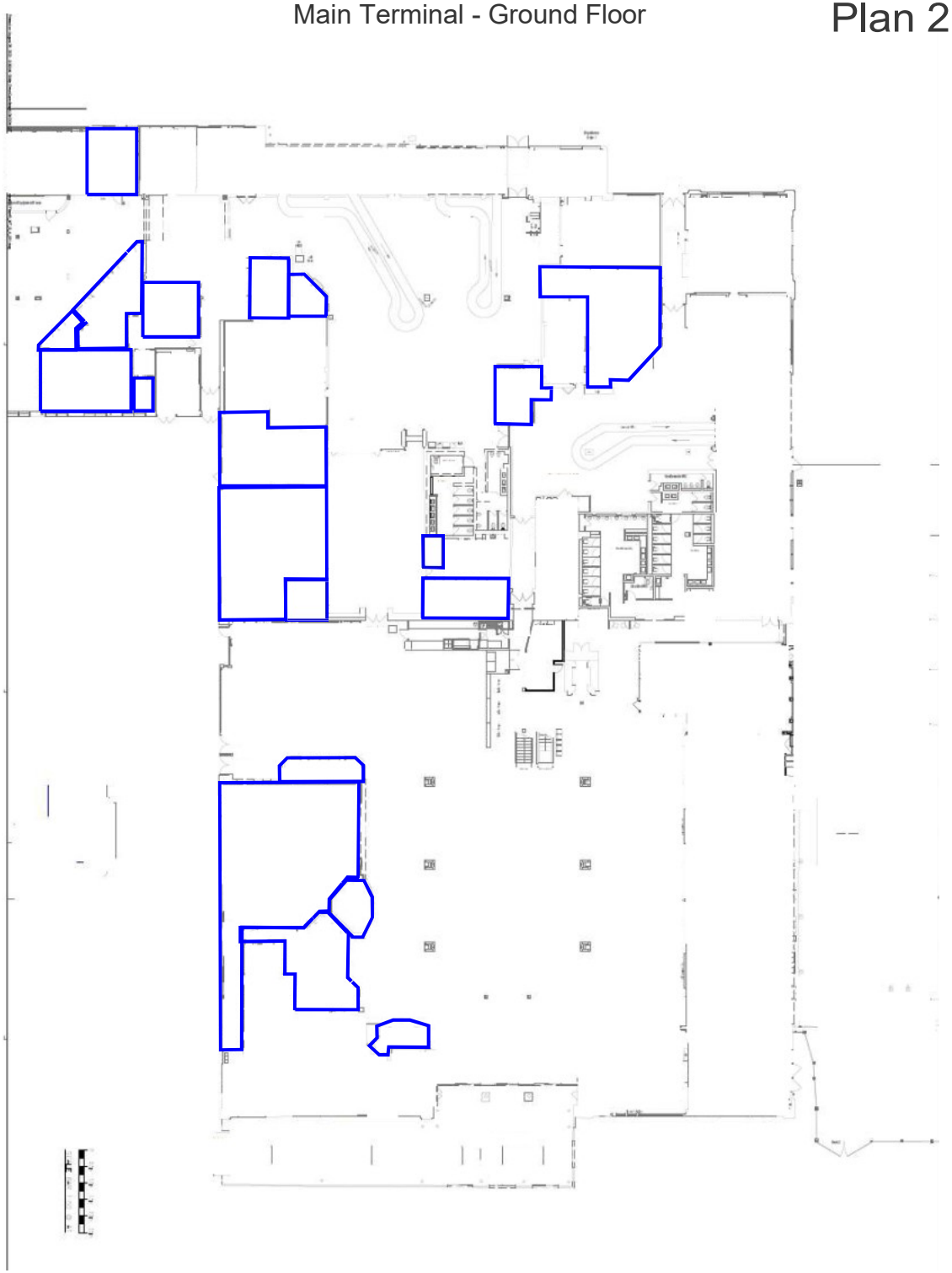
SCHEDULE 1 - PLANS

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

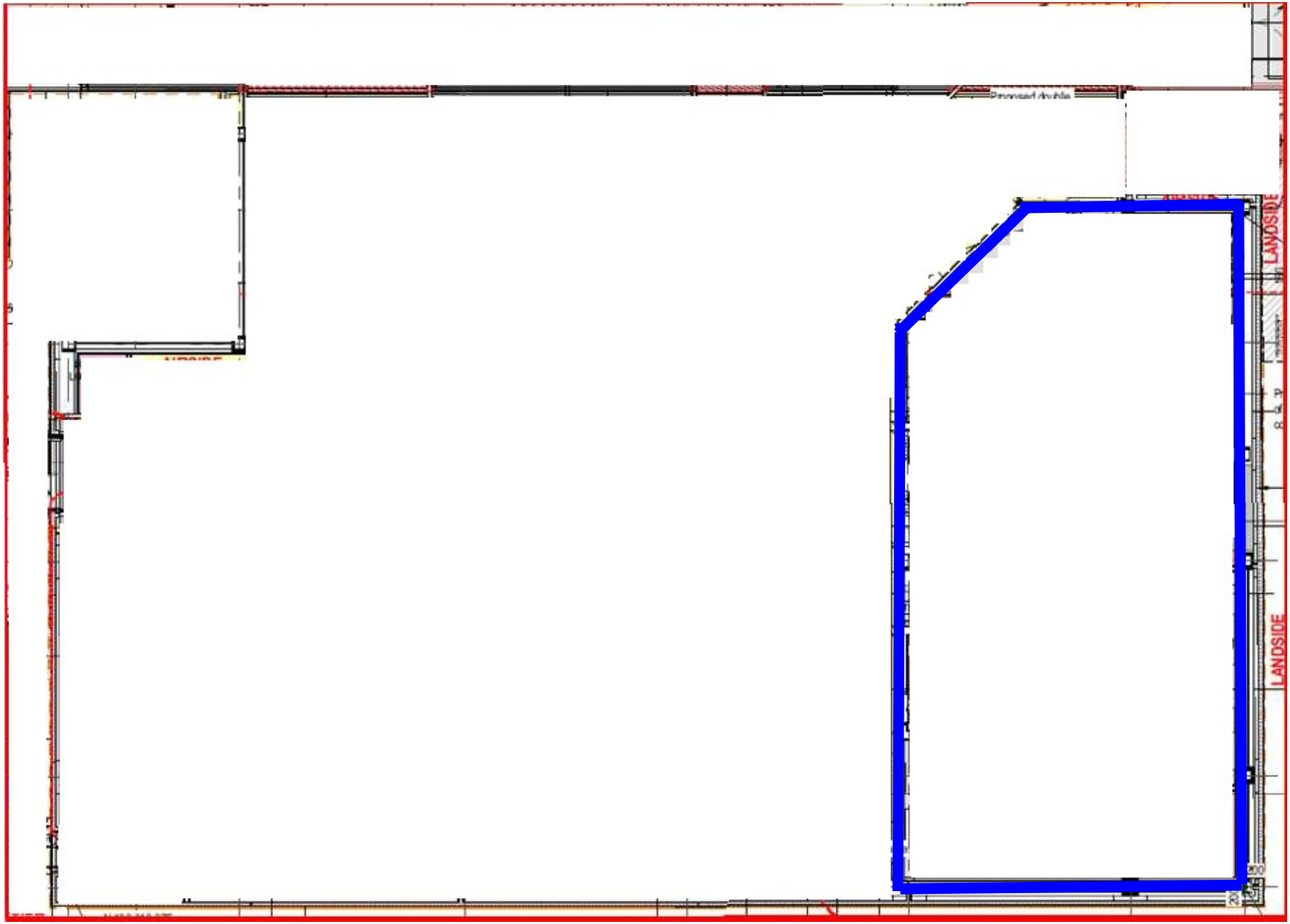
Main Terminal - Ground Floor

Plan 2



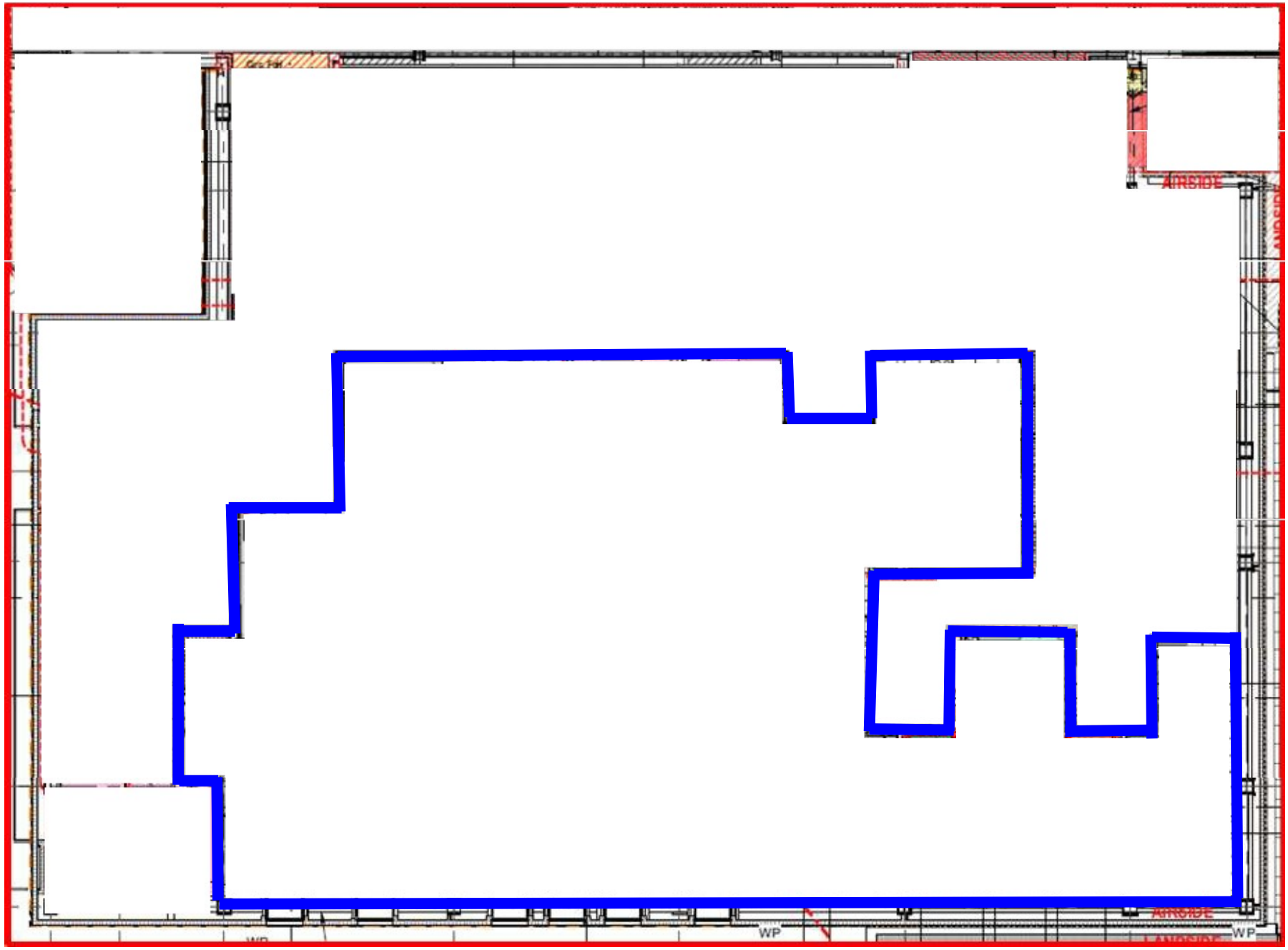
Terminal Immigration Facilities - Ground Floor

Plan 3



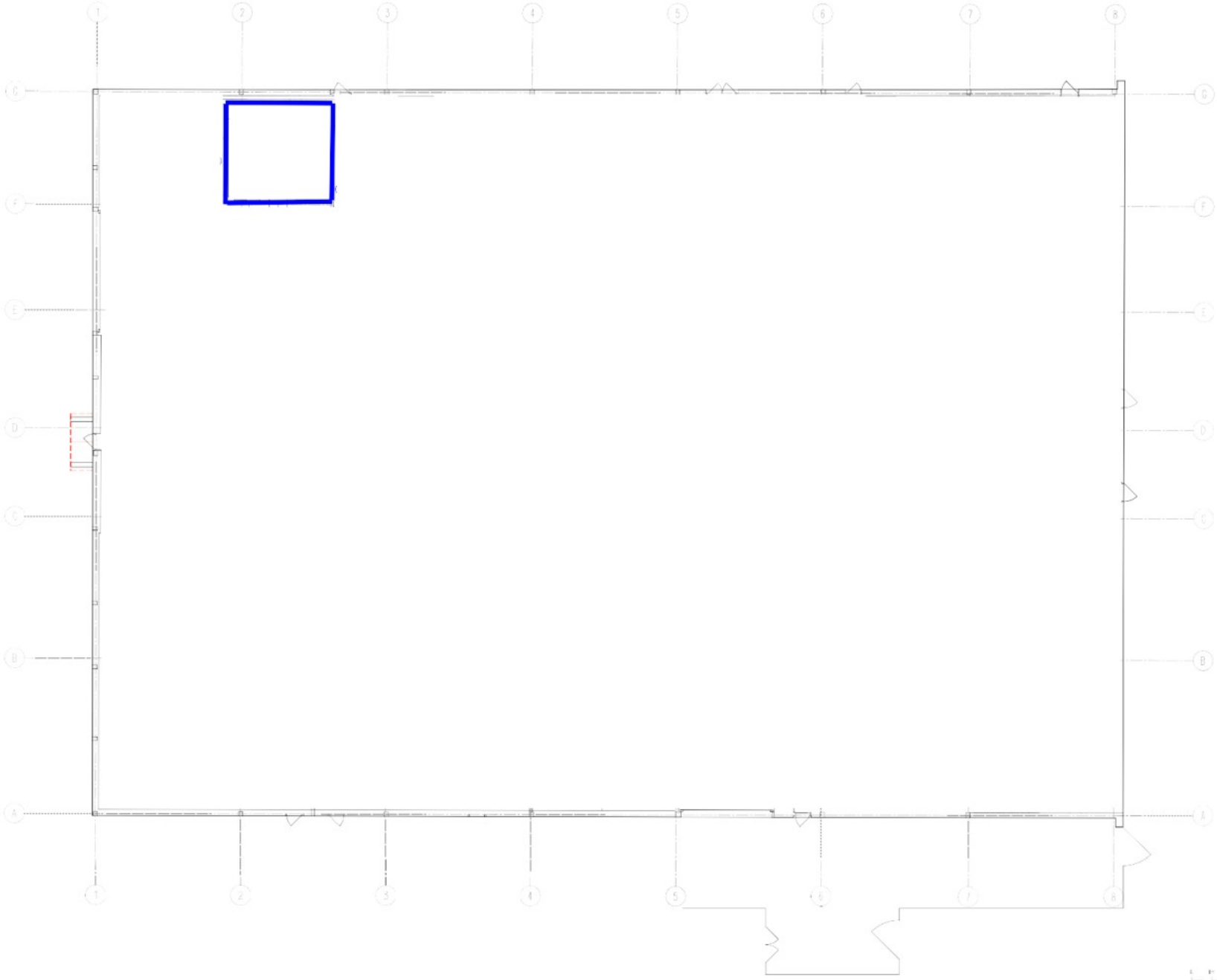
Terminal Immigration Facilities - First Floor

Plan 4



Blue Shed - Ground Floor

Plan 5

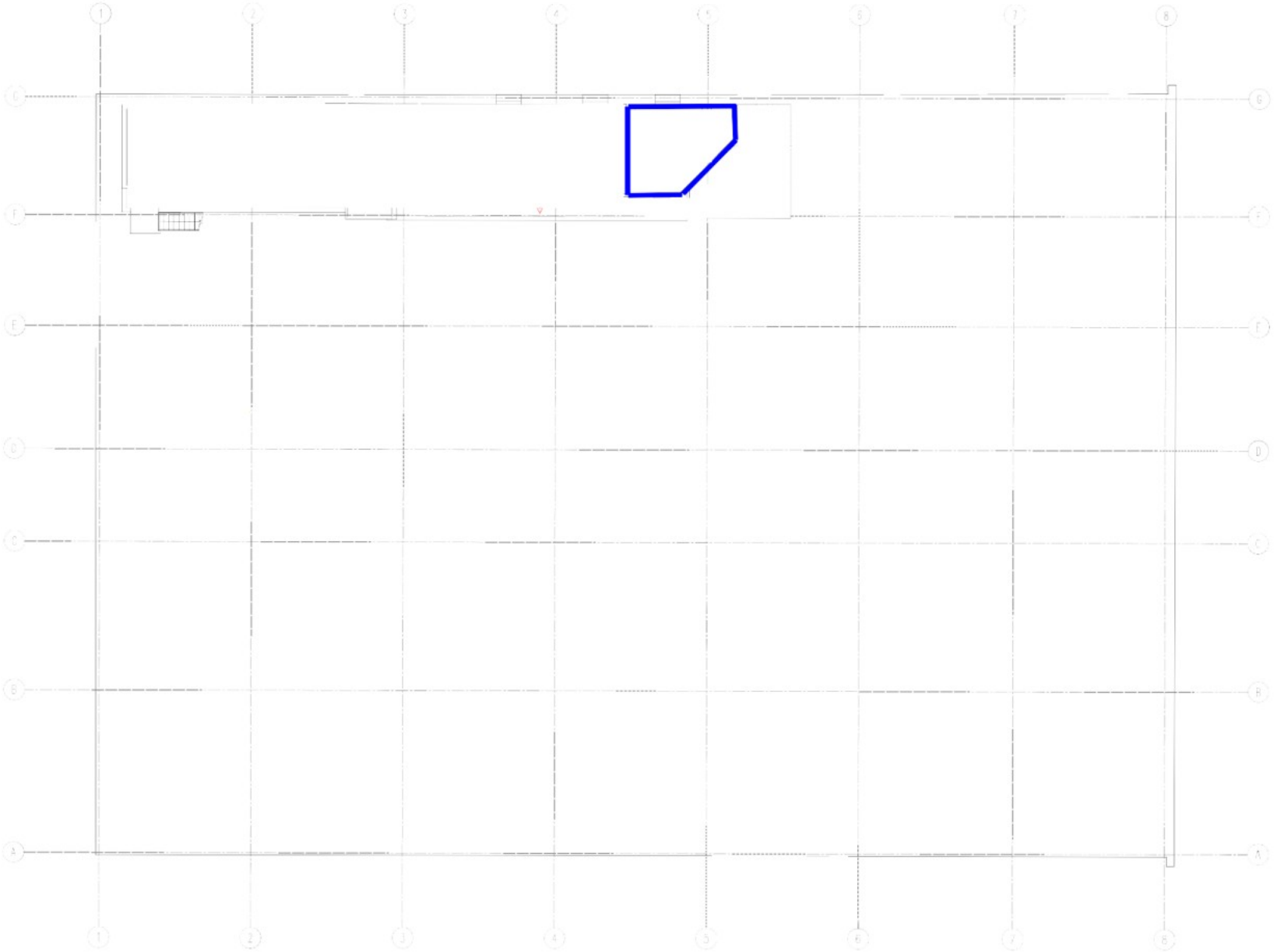


RECORD DRAWING

BLUE SHED

Blue Shed - First Floor

Plan 6



DO NOT SCALE - IF IN DOUBT ASK
Associated Drawings

General Notes

LEGEND
XXXX FIRE DOOR
XXXX STANDARD DOOR

1ST FLR

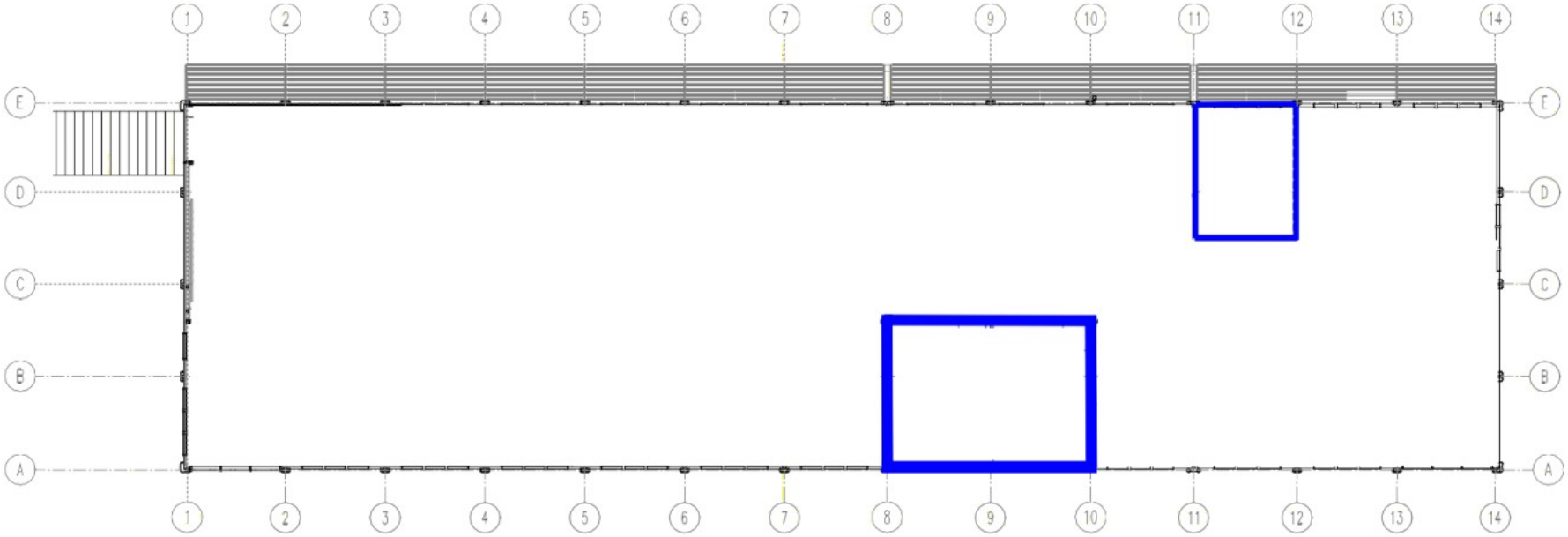
London City Airport
Get closer.

RECORD DRAWING

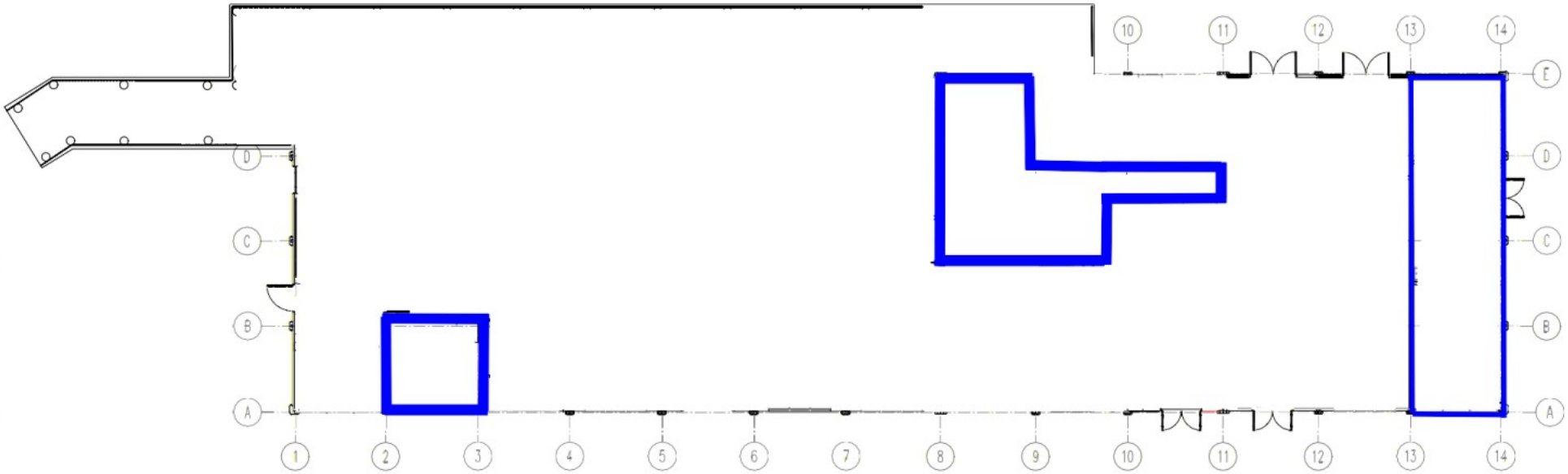
BLUE SHED

R/BS/A/001

Jet Centre - Ground Floor



Jet Centre - First Floor



LEGEND

Fire Door

Standard Door

G1 PLANS

London City Airport

Get closer

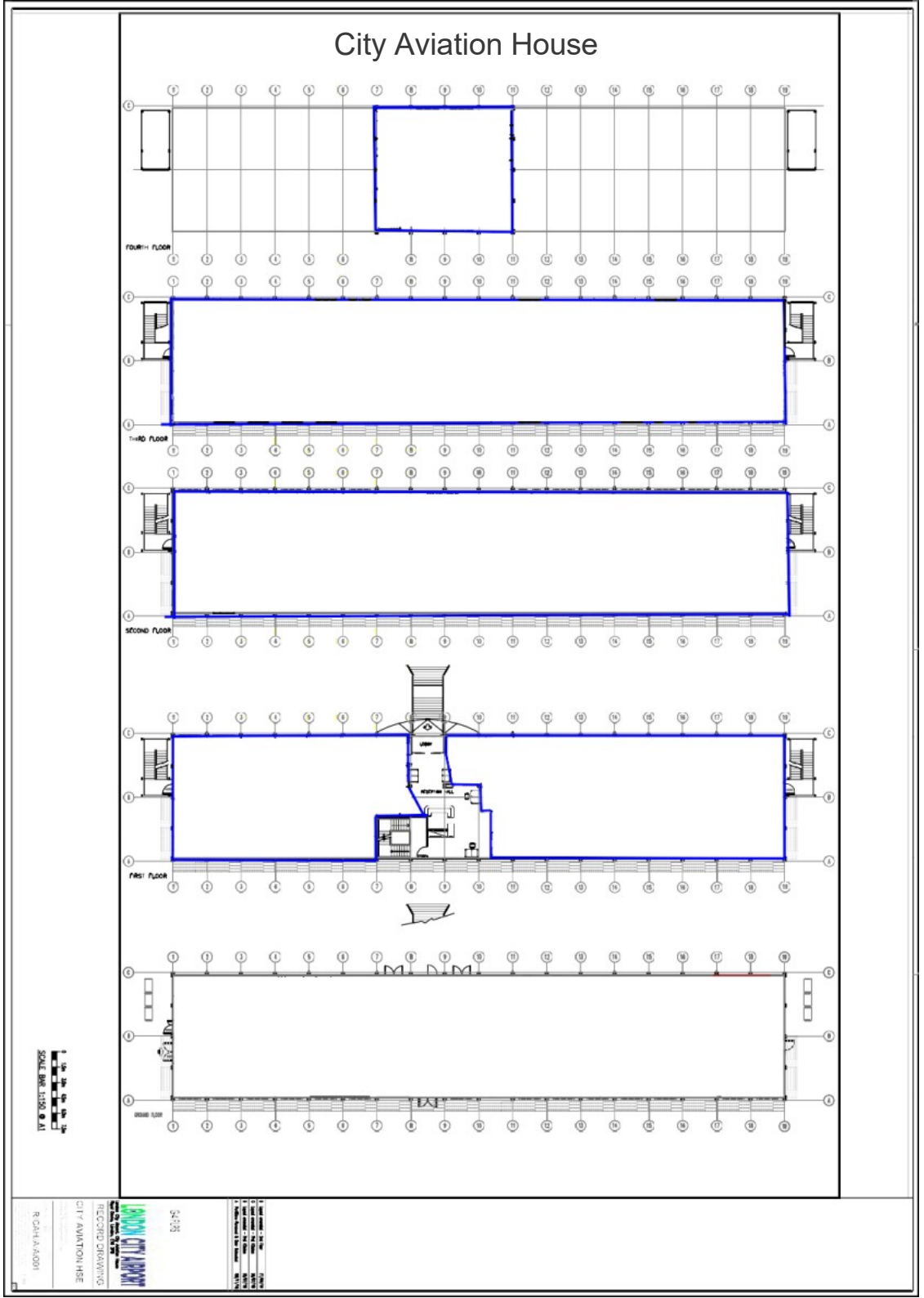
RECORD DRAWING

JET CENTRE

R/JC/A/A/001

SCALE BAR 1:75 @ A1

Plan 8


City Aviation House
FOURTH FLOOR
THIRD FLOOR
SECOND FLOOR
FIRST FLOOR
GROUND FLOOR
SCALE BAR 1:150 @ A1
CITY AVIATION HSE
RECORD DRAWING
LONDON CITY AIRPORT

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

KB-2024-001765 / KB-2024-002132 / KB-2024-002317 / KB-2024-002473

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 Dienne 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

N244

Application notice

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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

HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

KB-2024-001765

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

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.

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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

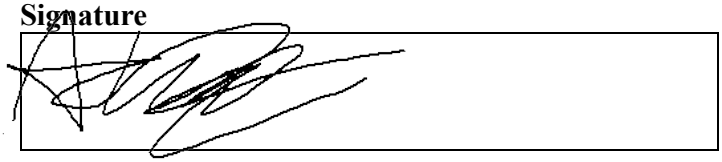
Statement of Truth

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	Month	Year
2	June	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

CLAIM NO: KB-2024-001765

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BEFORE: The Honourable Mr Justice Linden

DATED: 10 June 2026



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

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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: • 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.

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 injuncted 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;

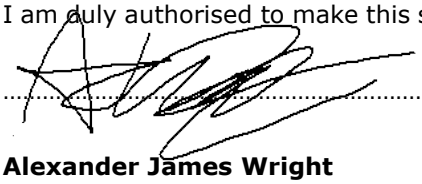
15.1.2.3 campaigner@fossilfreelondon.org and operations@fossilfreelondon.org which are understood to be linked to Fossil Free London; and

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

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

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

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

KB-2024-001765

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

Plan 1

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

X Notice locations

N

Map scale **1:5,650**

Assumes printed map area measures 395mm by 272mm.

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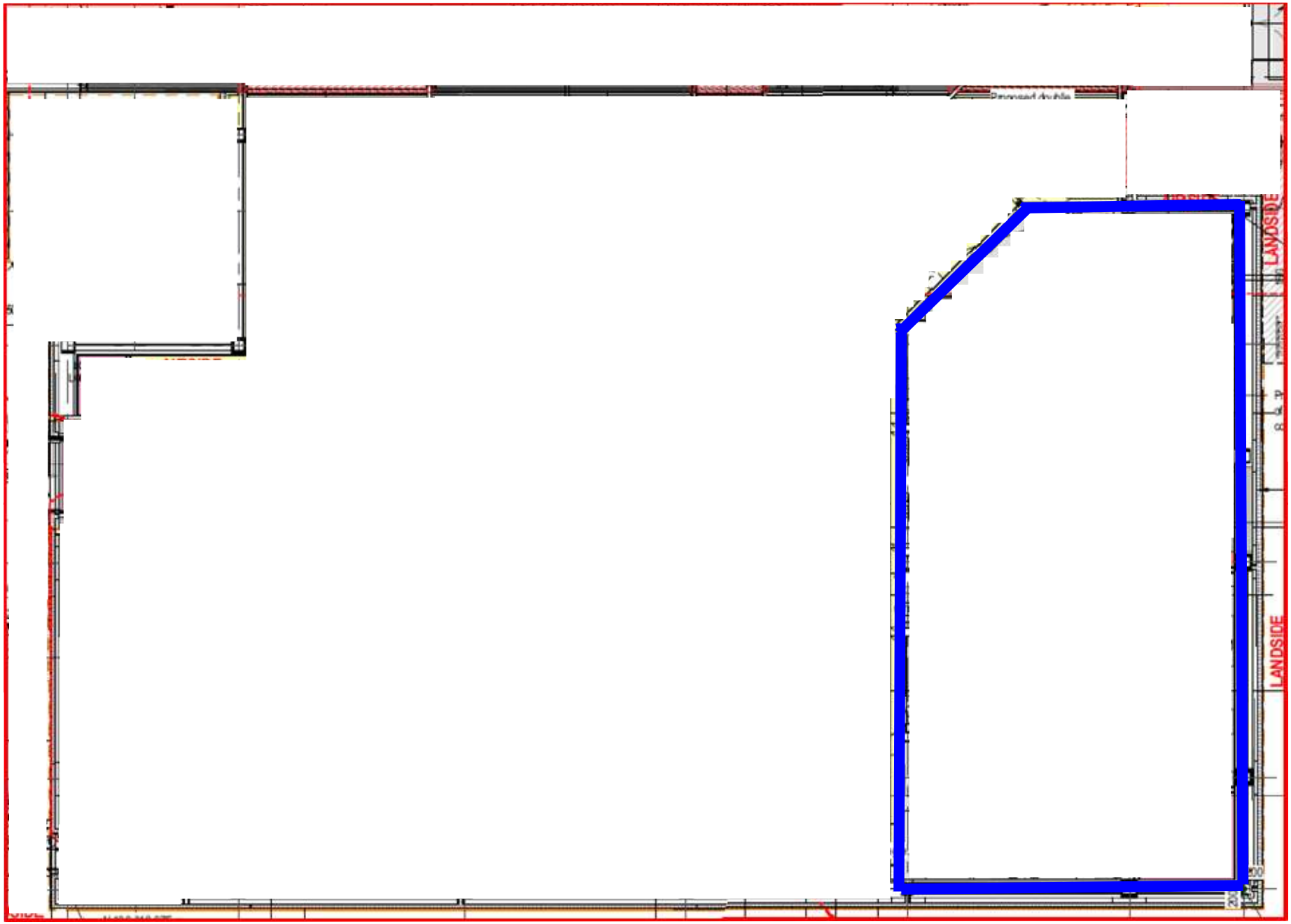
Main Terminal - Ground Floor

Plan 2



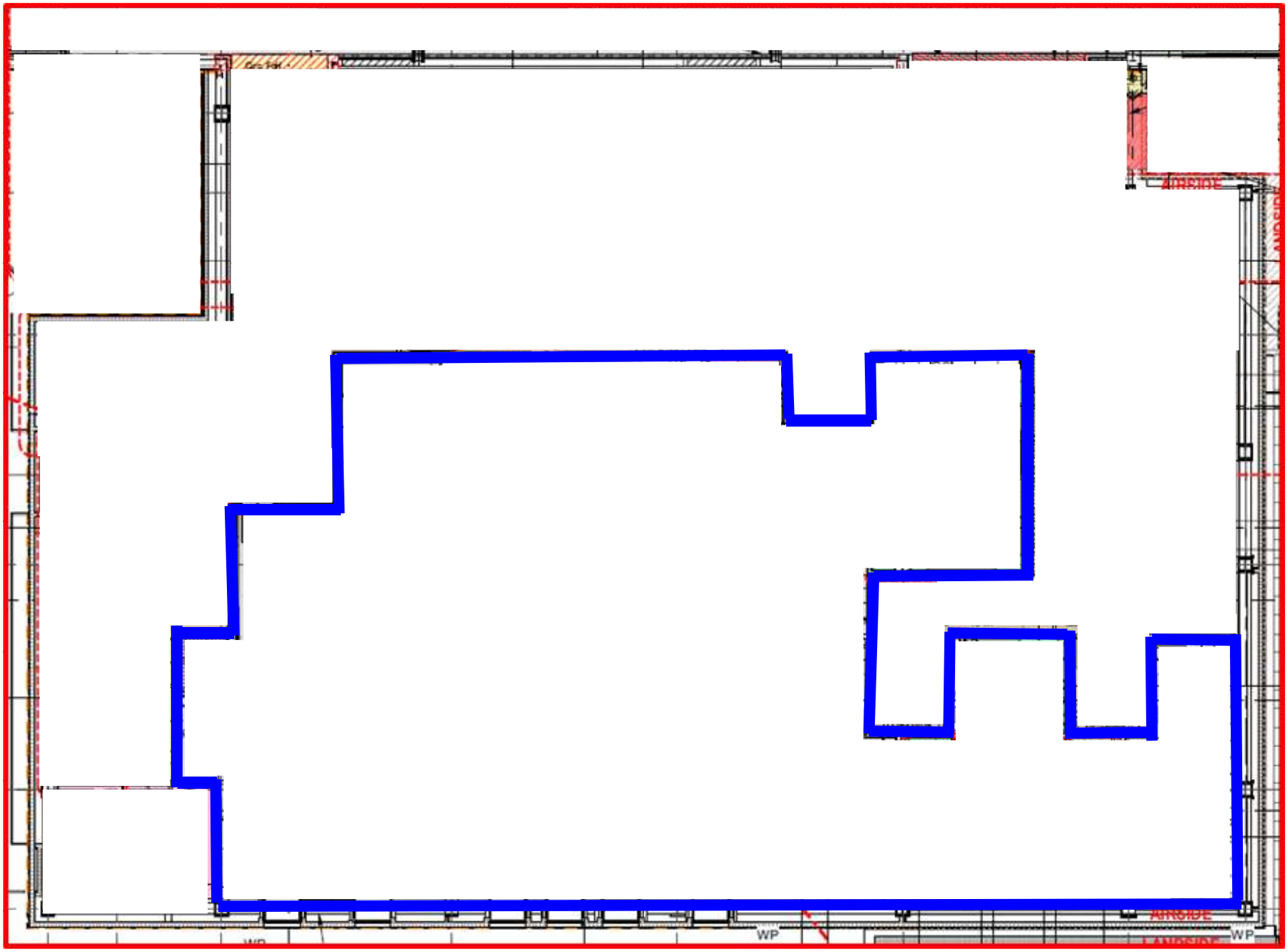
Terminal Immigration Facilities - Ground Floor

Plan 3



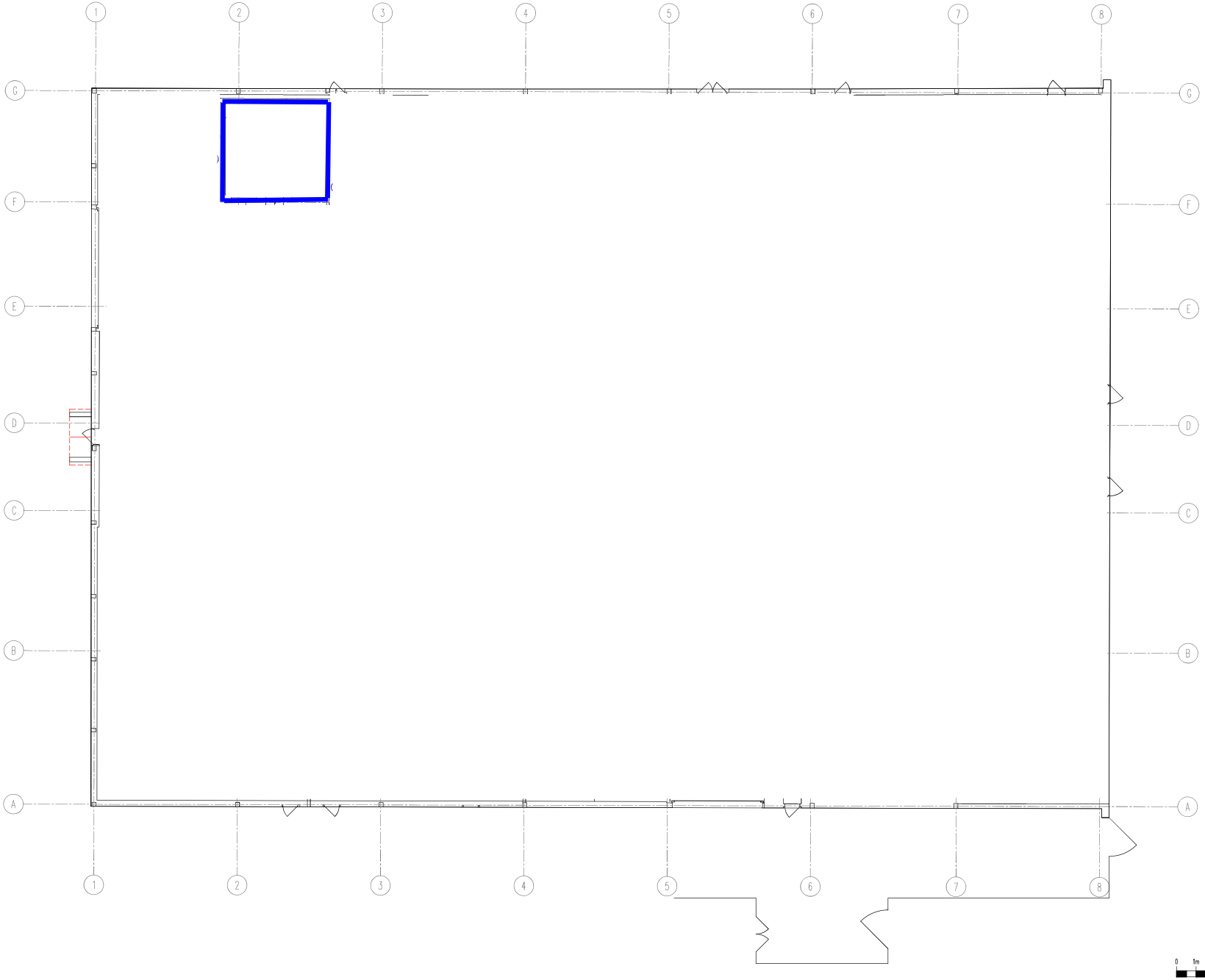
Terminal Immigration Facilities - First Floor

Plan 4



Blue Shed - Ground Floor

Plan 5

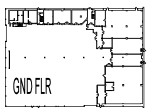


DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:

Rev	Change	Date
B	Room Numbers Added	01/11/18
A	Door Numbers Added	01/03/16



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

RECORD DRAWING

Title
BLUE SHED

Drawing Title
Ground Floor
General Arrangement Plan

Date	Drn By	Chk By	Appd
04/08/15	VR	-	-

Drawing Number R/BS/GA/001 Rev B

Scale 1:100

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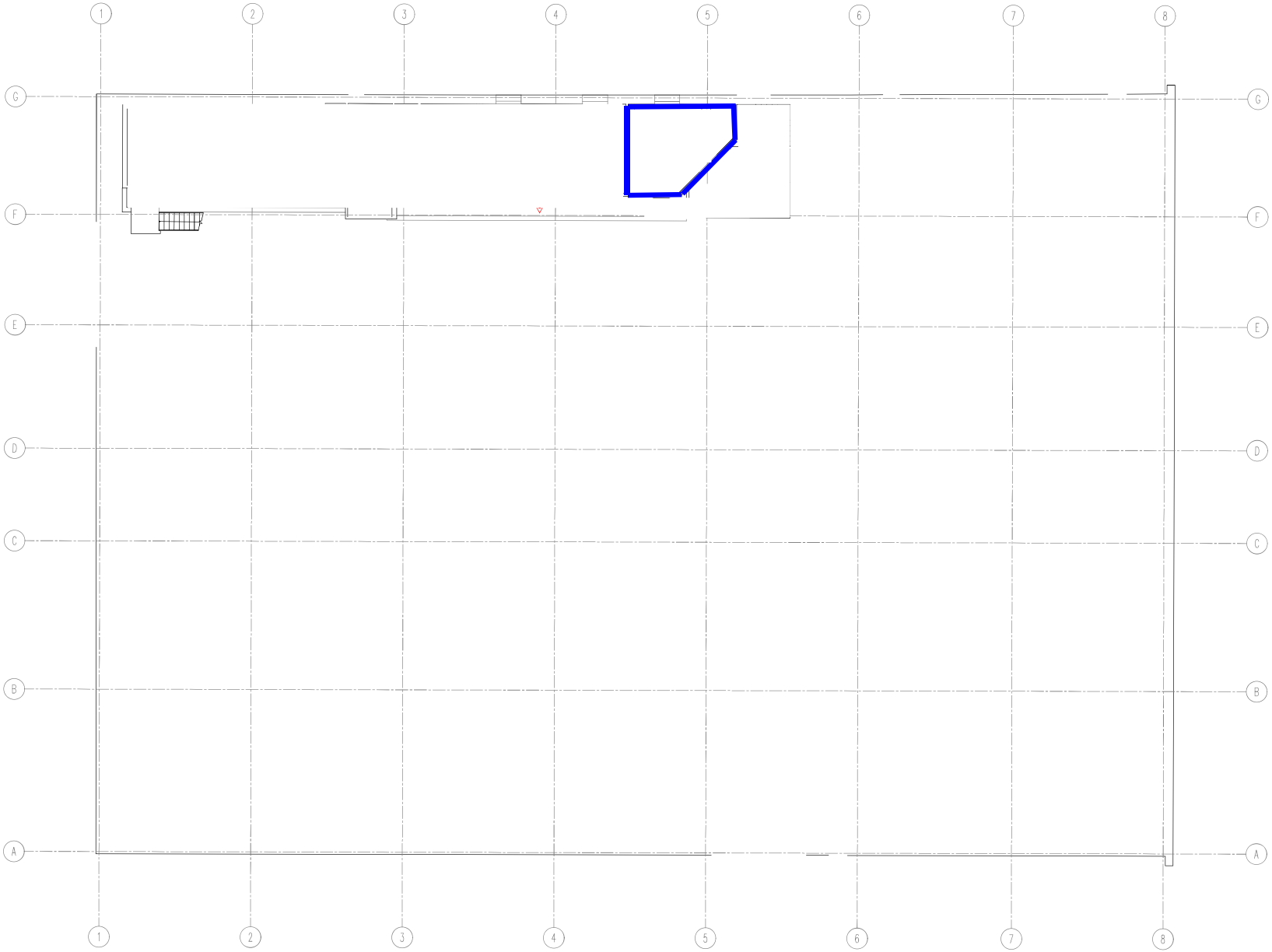
A1

Printed on: November 1, 2018 - 1:23PM C:\Users\Cartabriel\Documents\CartaBrien\LONDON CITY AIRPORT\Record Drawings\Blue Shed\Ground Floor\R_BS_G_GROUND FLOOR COORDINATED Rev B.dwg

Blue Shed - First Floor

Plan 6



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SCALE BAR 1:100 @ A1

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

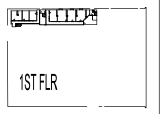
General Notes:

LEGEND

X/XXX FIRE DOOR

X/XXX STANDARD DOOR

Rev	Change	Date
B	Room Numbers Added	01/11/18
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

Title
BLUE SHED

Drawing Title
First Floor
General Arrangement

Date	Dn By	Ckd By	Appd
04/08/15	VR	-	-

Drawing Number R/BS/A/001 Rev B

Scale 1:100

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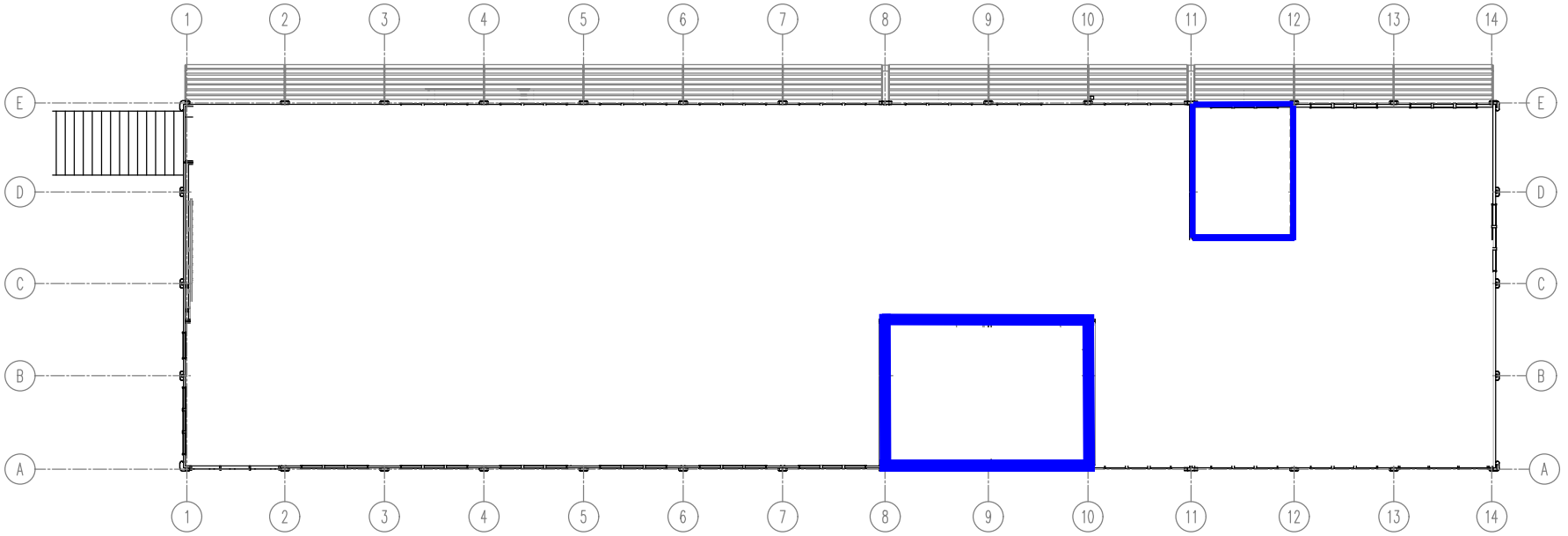
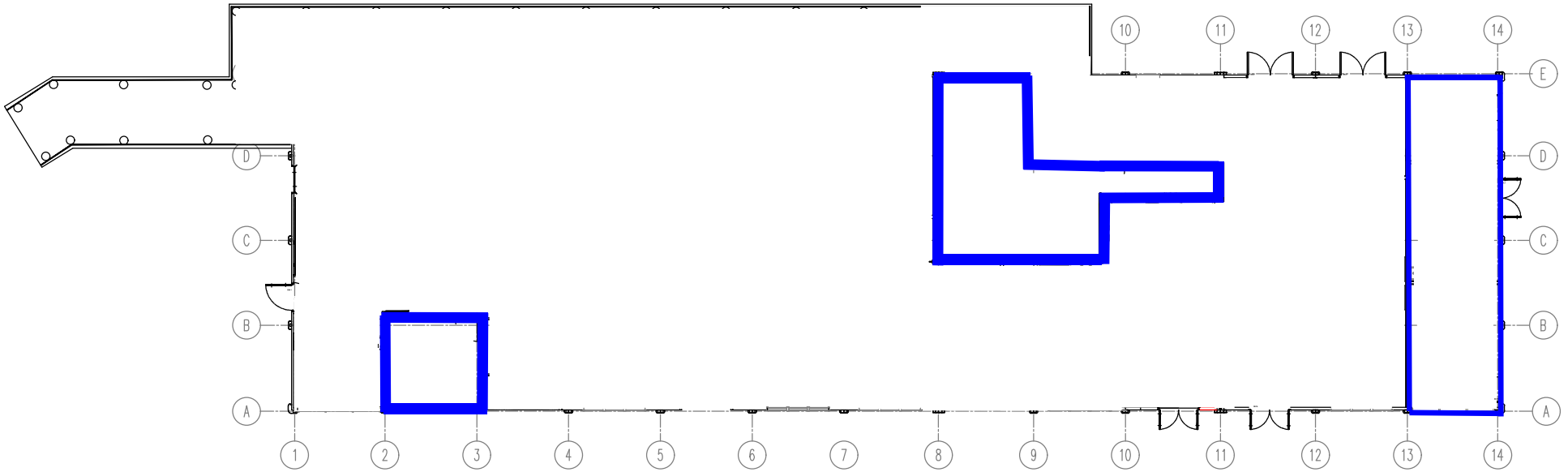
Plan 7

Jet Centre - Ground Floor



Jet Centre - First Floor



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SCALE BAR 1:75 @ A1

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:

LEGEND

X/XXX Fire Door

X/XXX Standard Door

Rev	Change	Date
E	Room Numbers Added	16/08/18
D	Layout amended	19/04/18
C	04/04/18	04/03/16
B	Door Numbers Added	04/03/16
A	Modified as indicated	12/06/15

G-1 FLRS

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

RECORD DRAWING

Title
JET CENTRE

Drawing Title
Ground to First Floor
General Arrangement Plan

Date	Drn By	Chk By	Appvd
24/07/15	VR	-	-

Drawing Number R/JC/A/A/001 Rev E

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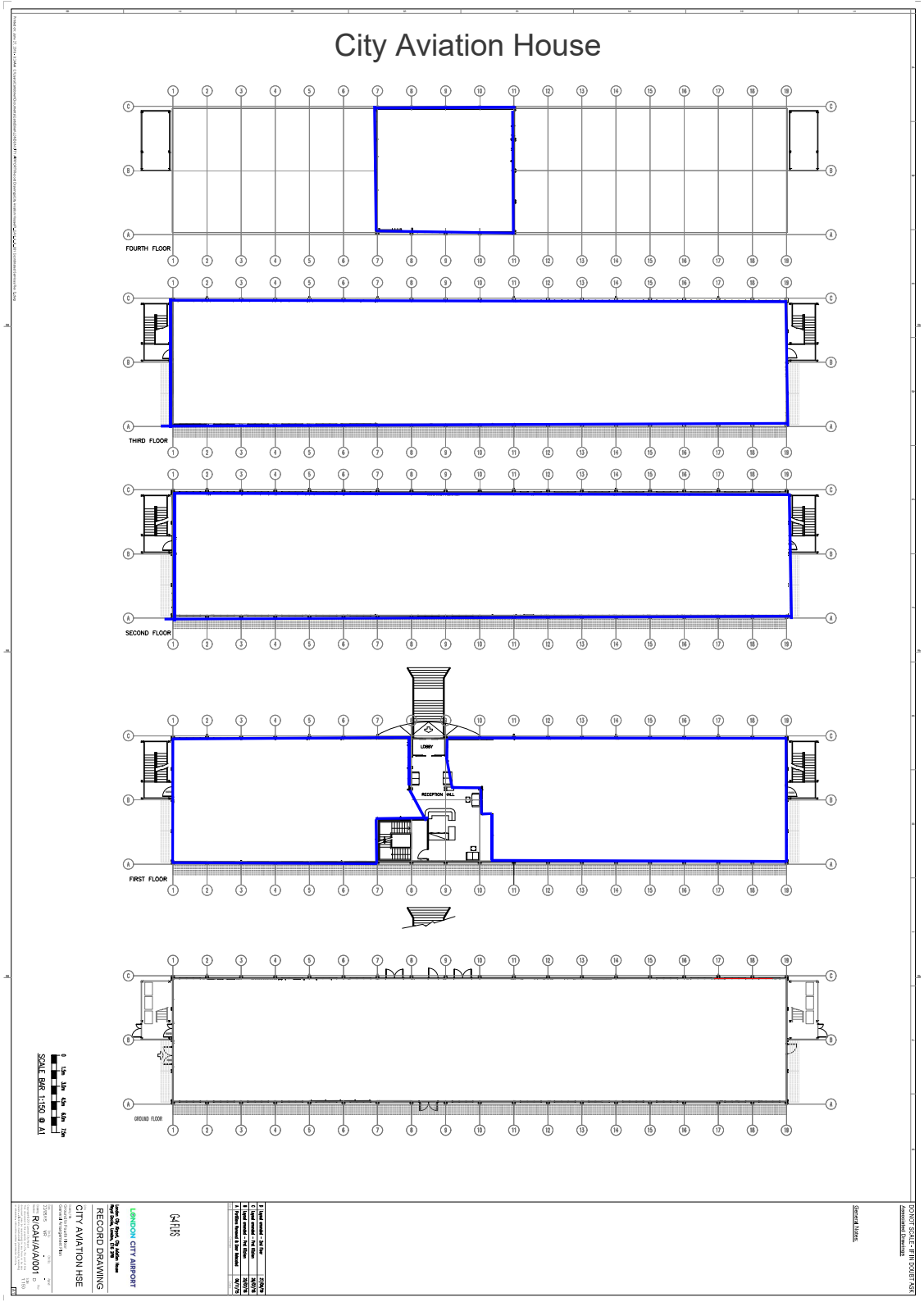
Scale 1:75

A1

Printed on: August 18, 2016 - 11:14AM C:\Users\CartoBrien\Documents\CartoBrien\LONDON CITY AIRPORT\Record Drawings\Jet Centre\R_JC_A_A_001 Coordinated Services Rev D.dwg

Plan


City Aviation House
FOURTH FLOOR
THIRD FLOOR
SECOND FLOOR
LOBBY
RECEPTION WALL
FIRST FLOOR
GROUND FLOOR
SCALE BAR 1:150 @ A1
CITY AVIATION HSE
RECORD DRAWING
LONDON CITY AIRPORT
DO NOT SCALE - IF IN DOUBT ASK
Standard Notes
Associated Drawings

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

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

AJW2

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

Claim no: KB-2024-001765

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

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

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 **CLAIM NO: KB-2024-001765**
KINGS BENCH DIVISION

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

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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

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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

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

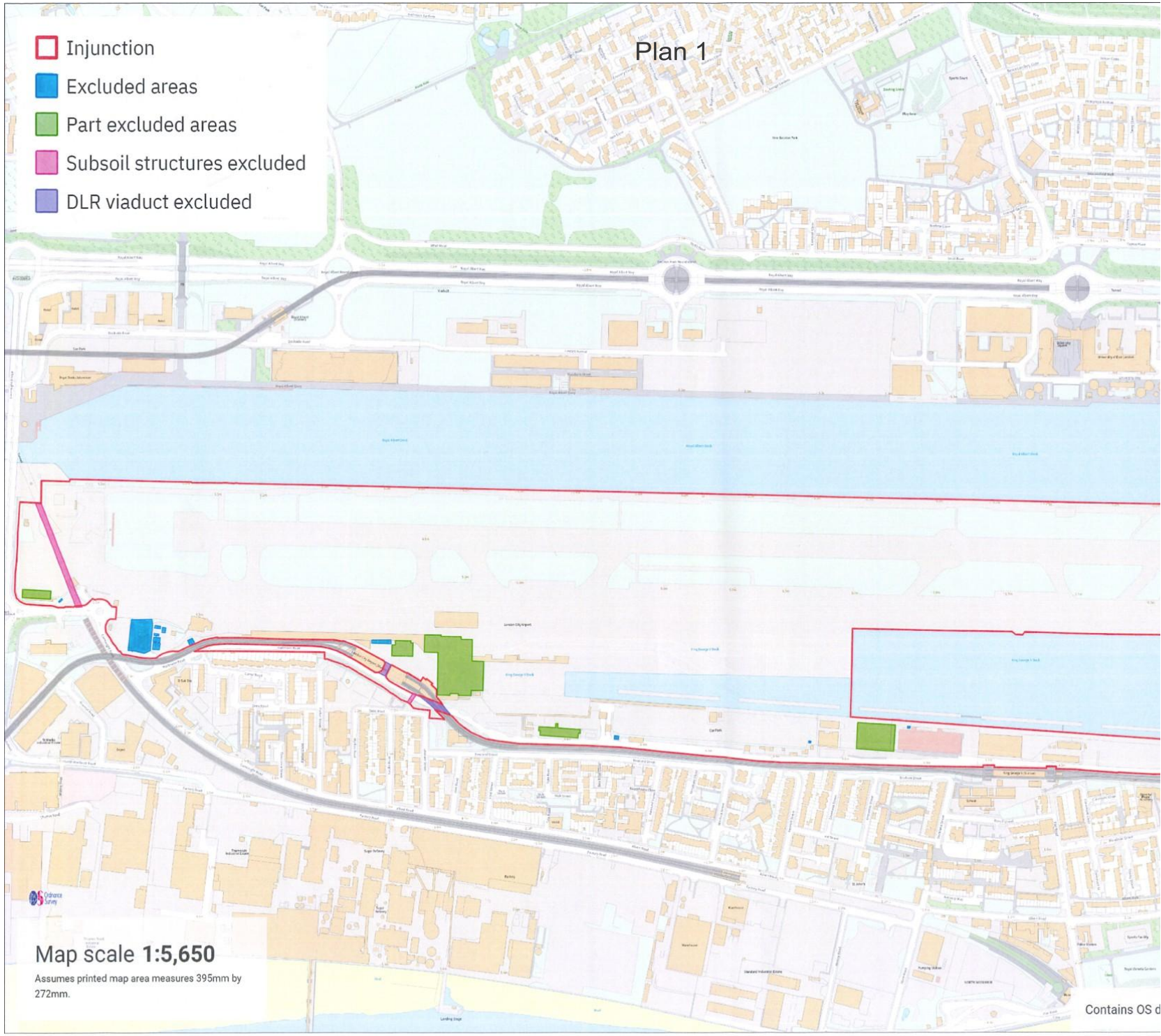
16. The Claimants' solicitors and their contact details are:

(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

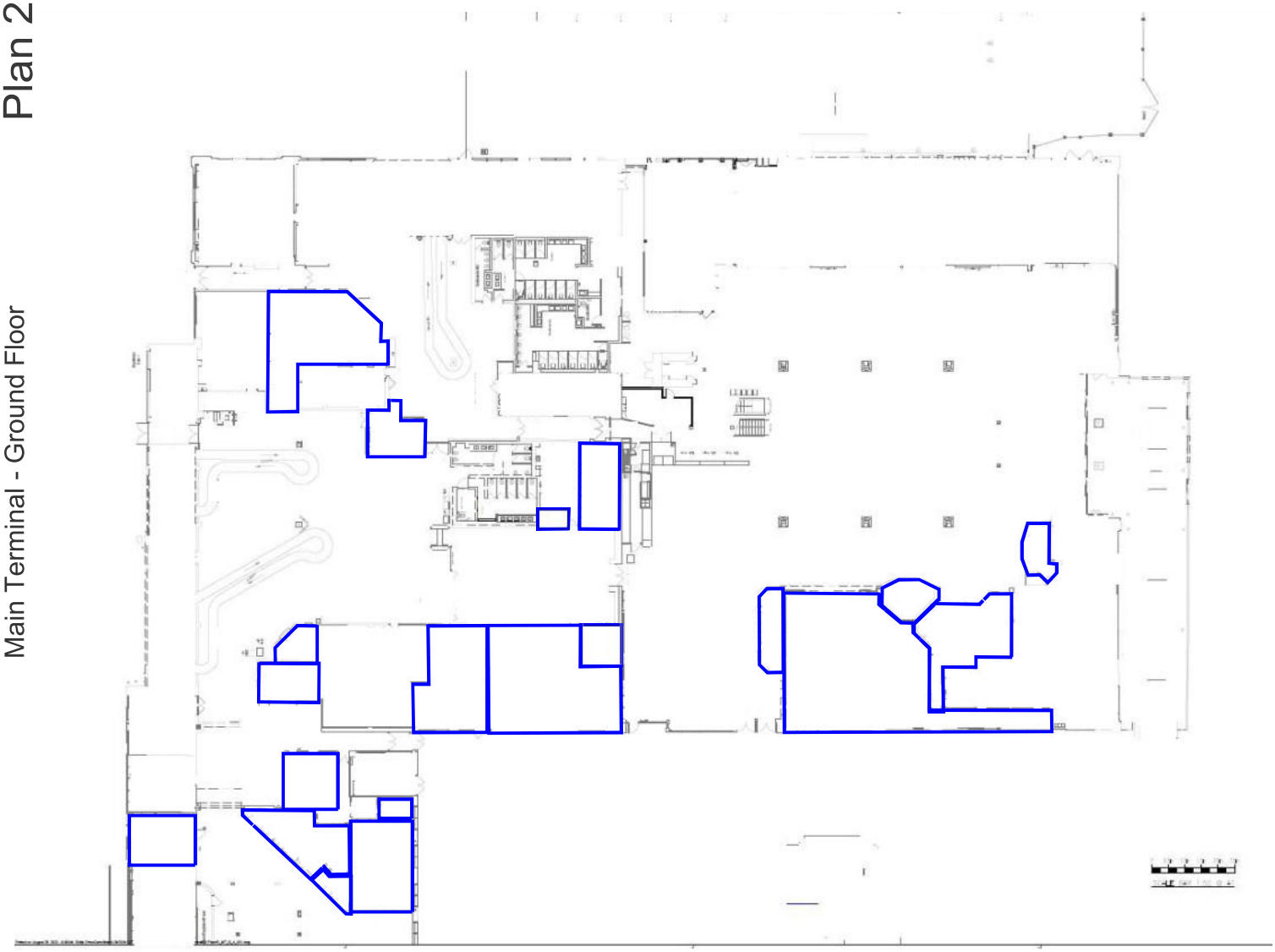
Dated: 20 June 2024

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

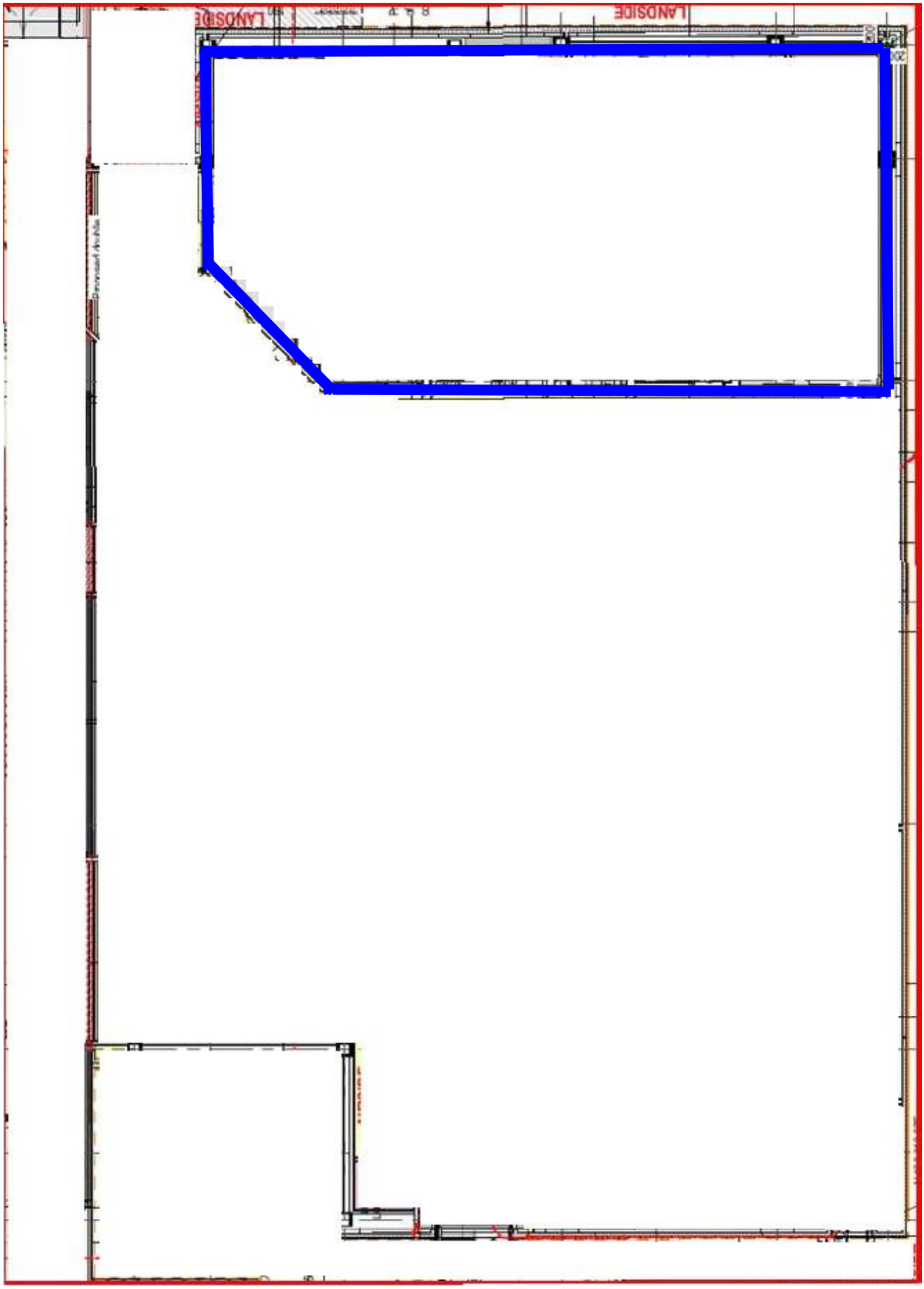
Plan 2

Main Terminal - Ground Floor



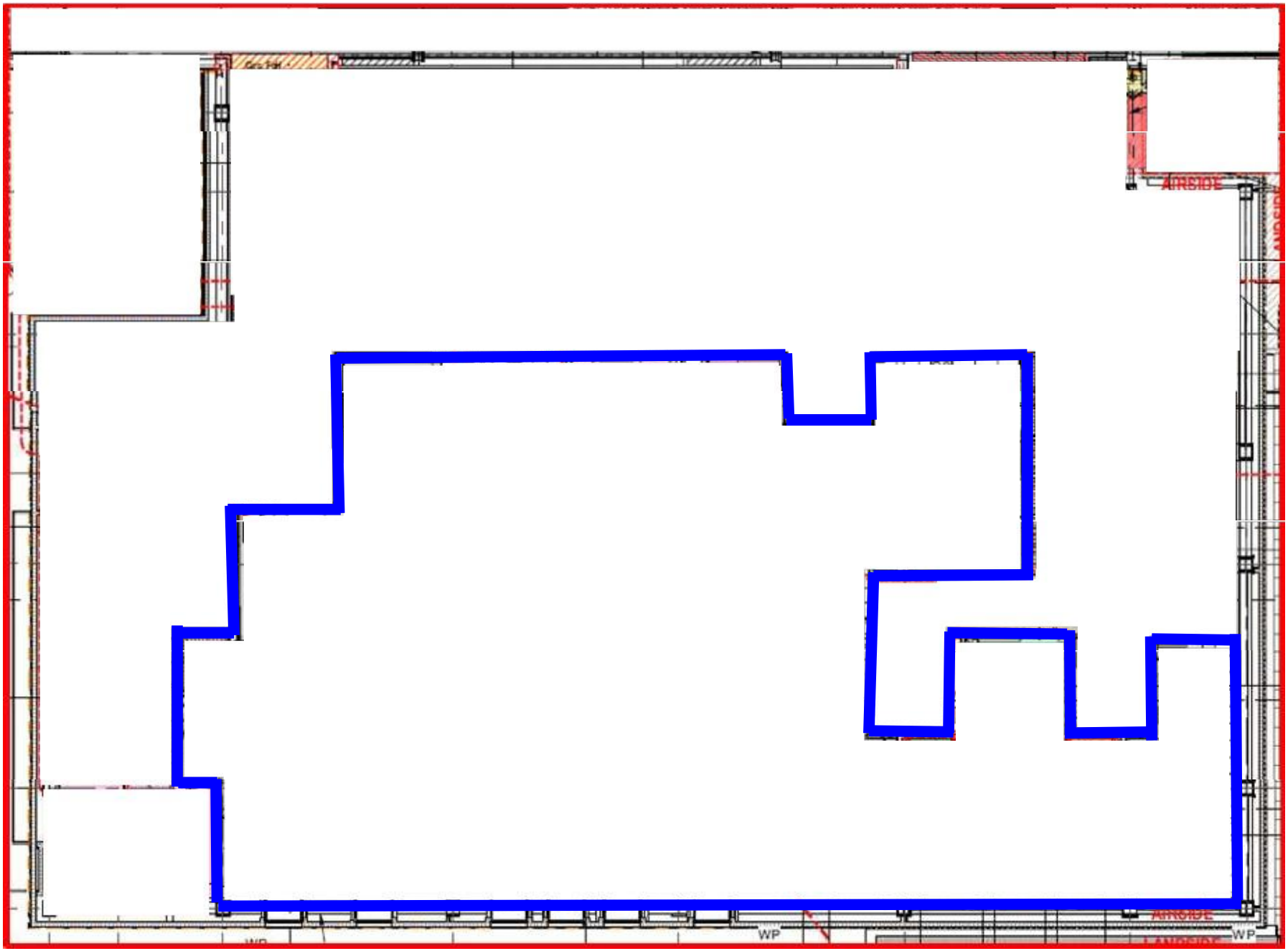
Plan 3

Terminal Immigration Facilities - Ground Floor



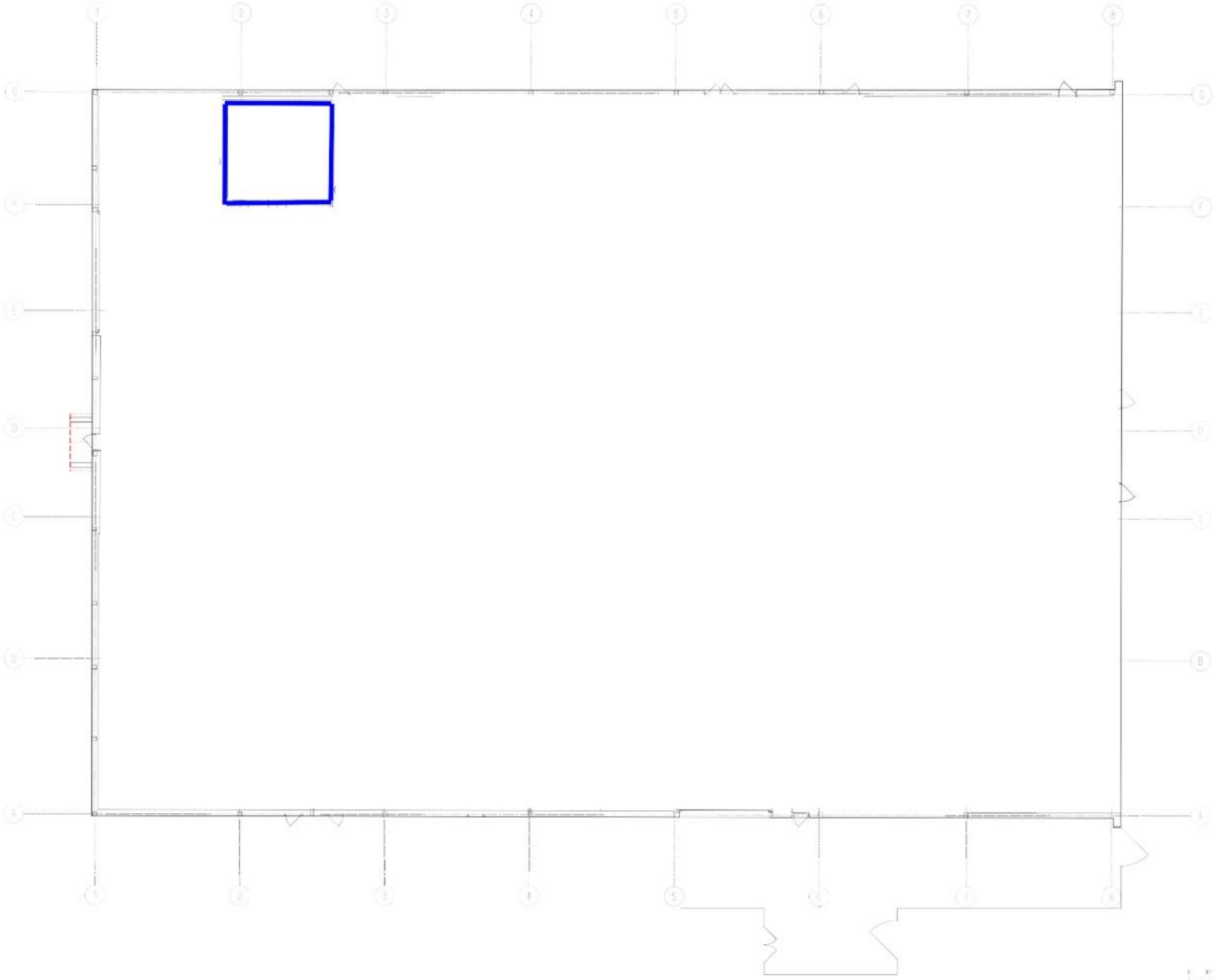
Terminal Immigration Facilities - First Floor

Plan 4



Blue Shed - Ground Floor

Plan 5



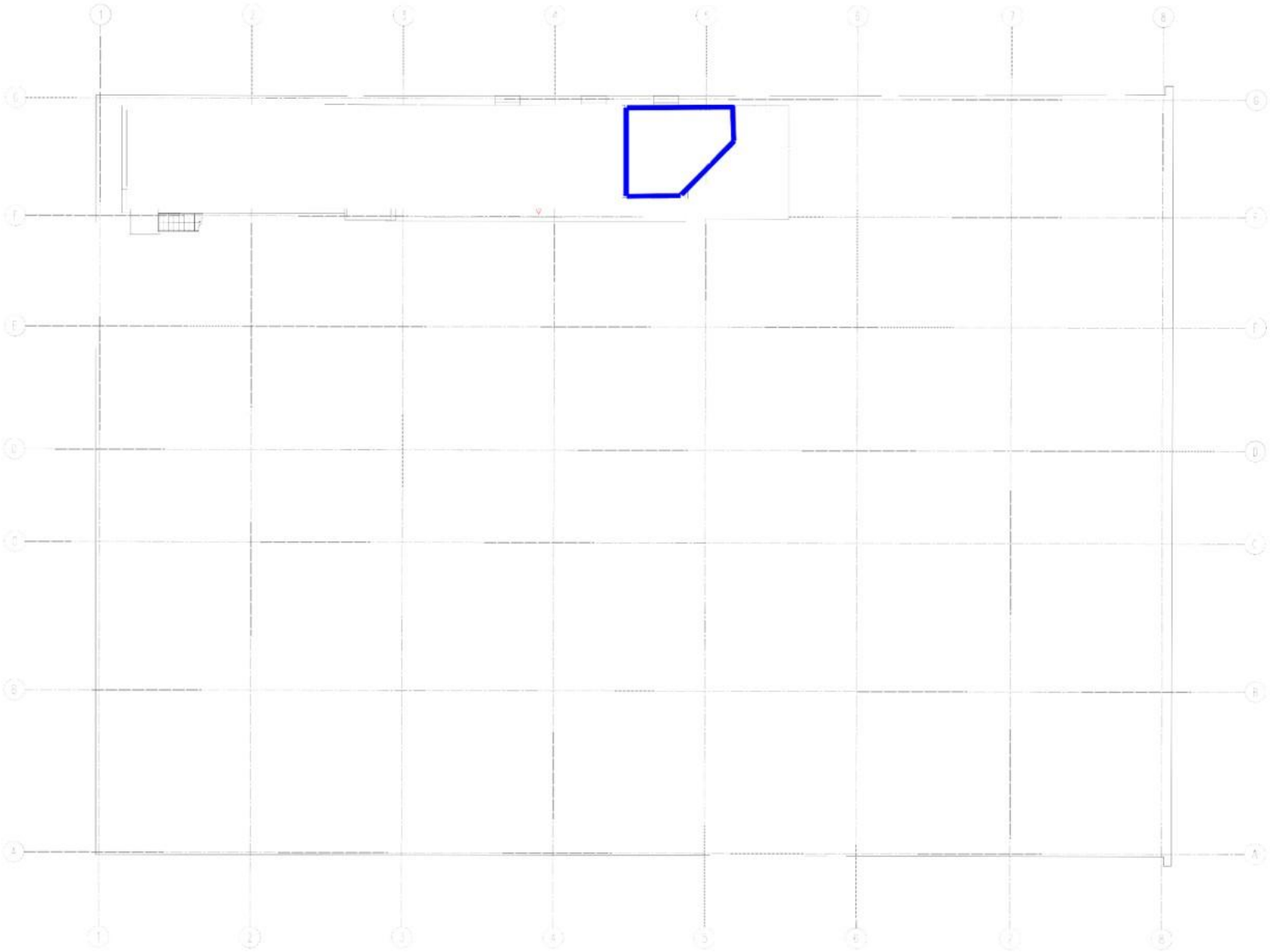
RECORD DRAWING

BLUE SHED

R/BS/G/A/001

Blue Shed - First Floor

Plan 6



LEGEND
XXXX FIRE DOOR
XXXX STANDARD DOOR

1ST FLR

London City Airport
Get closer.

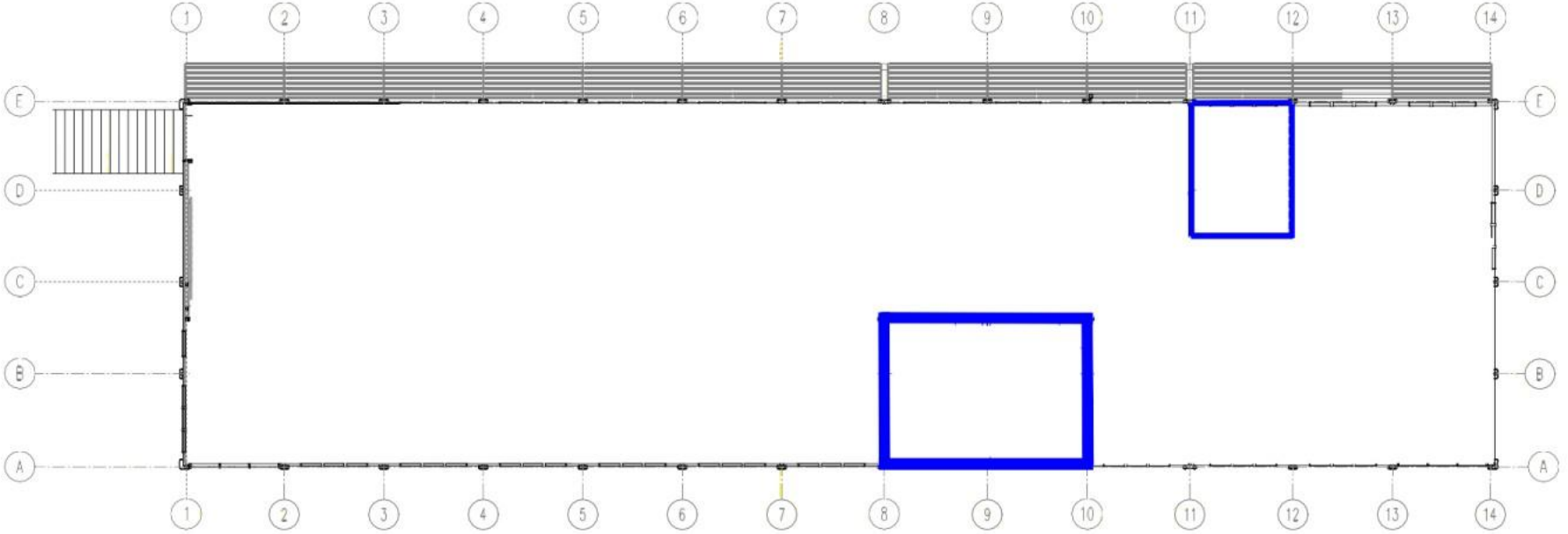
RECORD DRAWING

BLUE SHED

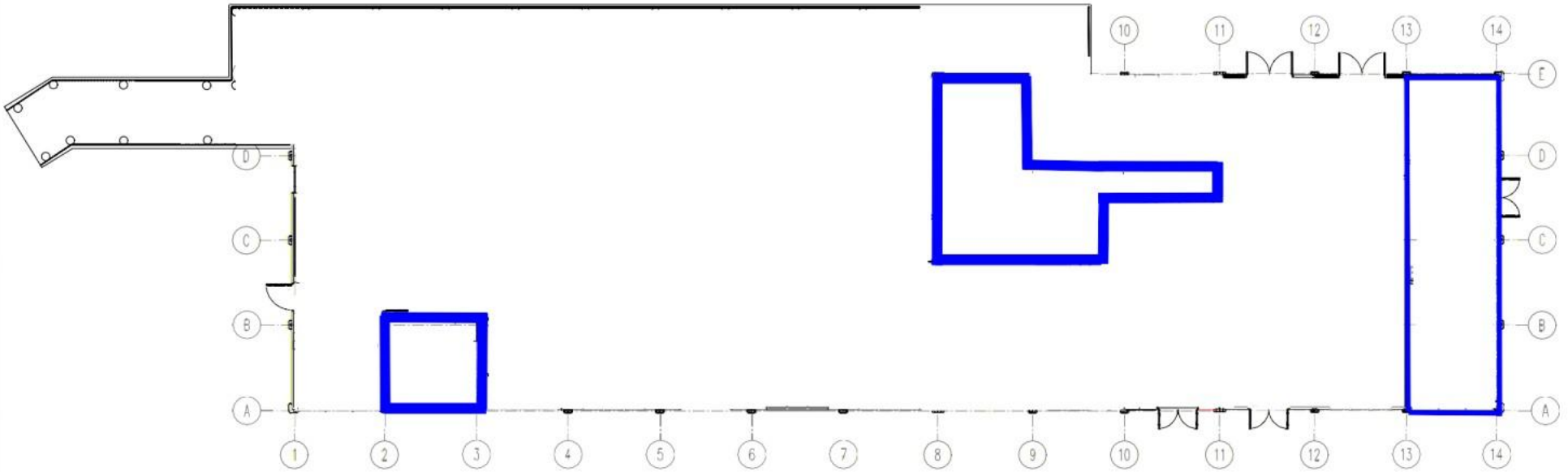
R/BS/1/A/001

Plan 7

Jet Centre - Ground Floor



Jet Centre - First Floor



LEGEND

X/XXX Fire Door

X/XXX Standard Door

G+FLRS

London City Airport

Get closer

RECORD DRAWING

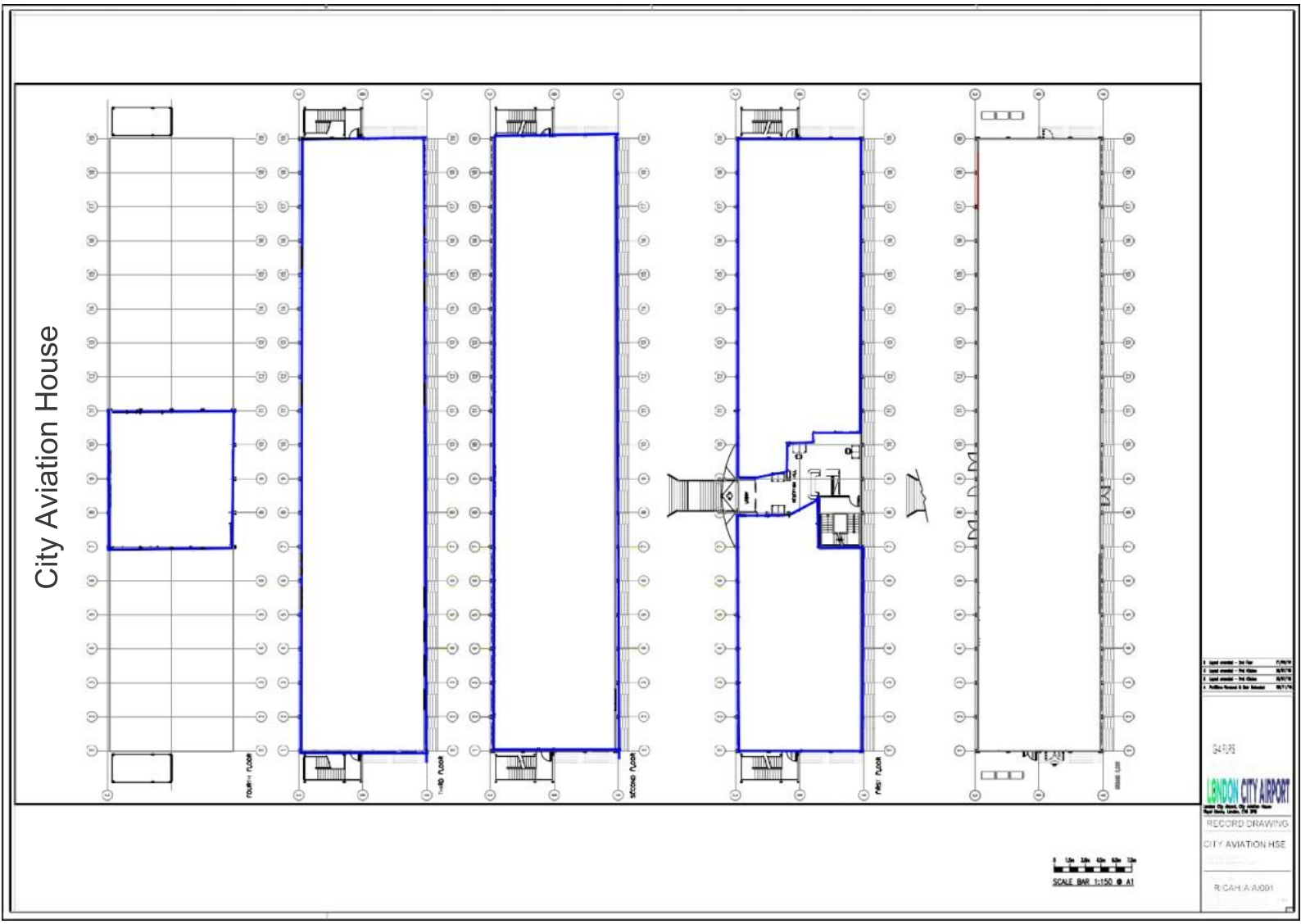
JET CENTRE

R/JC/A/A/001

SCALE BAR 1:75 @ A1

Plan 8

City Aviation House



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

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

AJW3

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

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)

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 Dienne 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

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

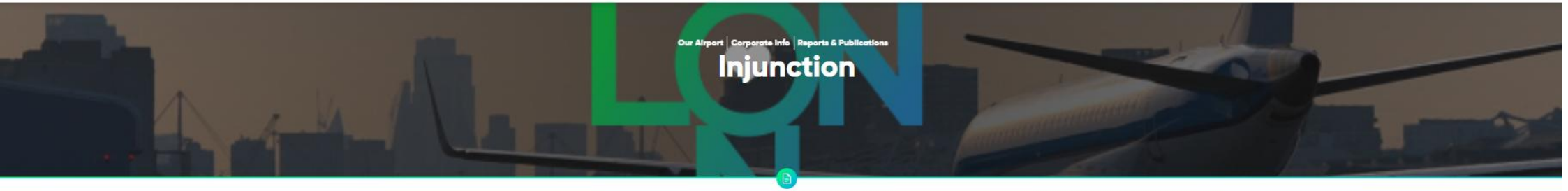
- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

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

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

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

N

Map scale **1:5,650**

Assumes printed map area measures 395mm by 272mm.

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ORBITAL WITNESS

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

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

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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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

To whom it may concern

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

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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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

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

N

Map scale **1:5,650**

Assumes printed map area measures 395mm by 272mm.

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ORBITAL WITNESS

1

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
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- v –

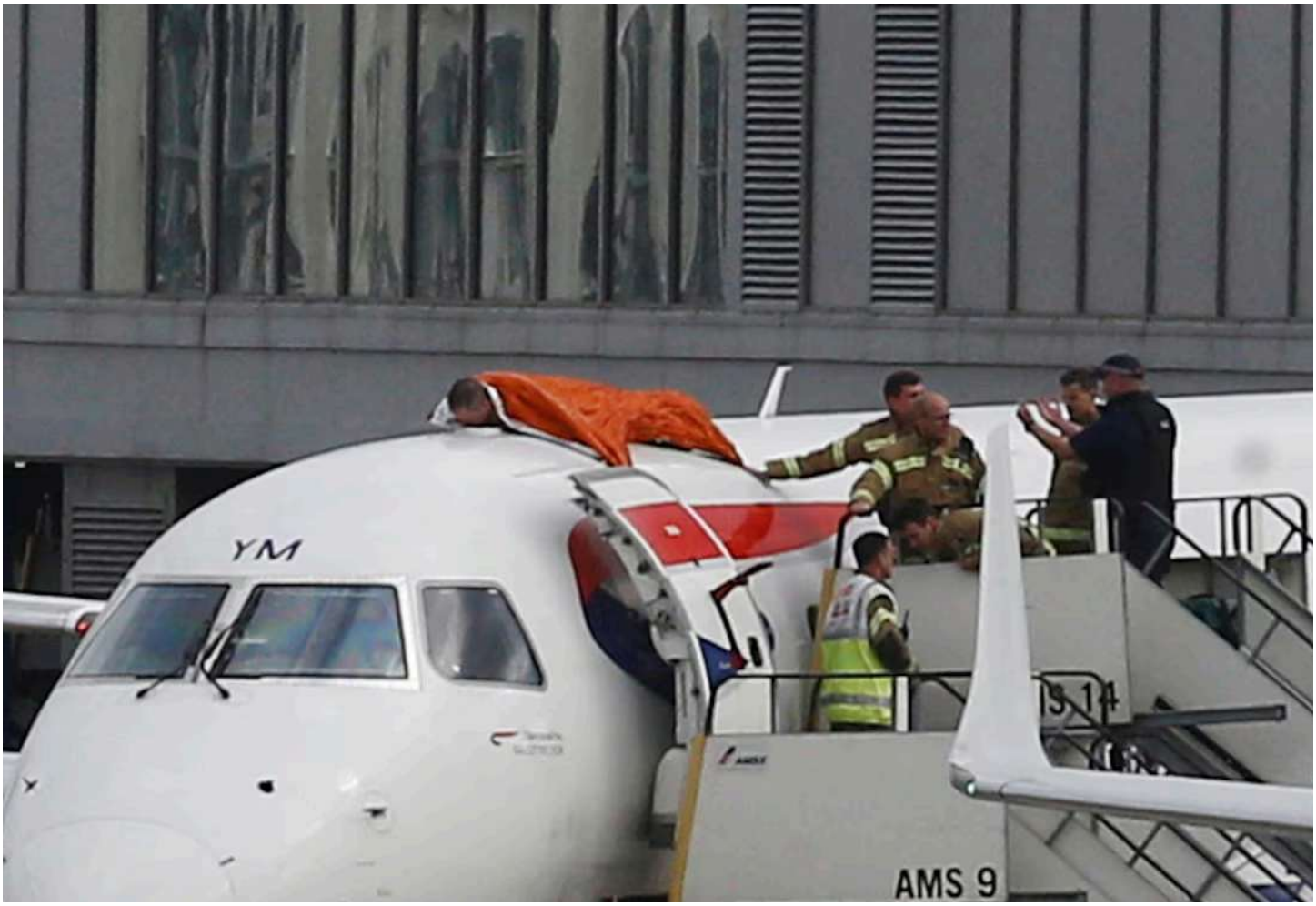
PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW8

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

Learn more about LSEG



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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Feedback



[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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Feedback



[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

Share this photo

Feedback



[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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Feedback



[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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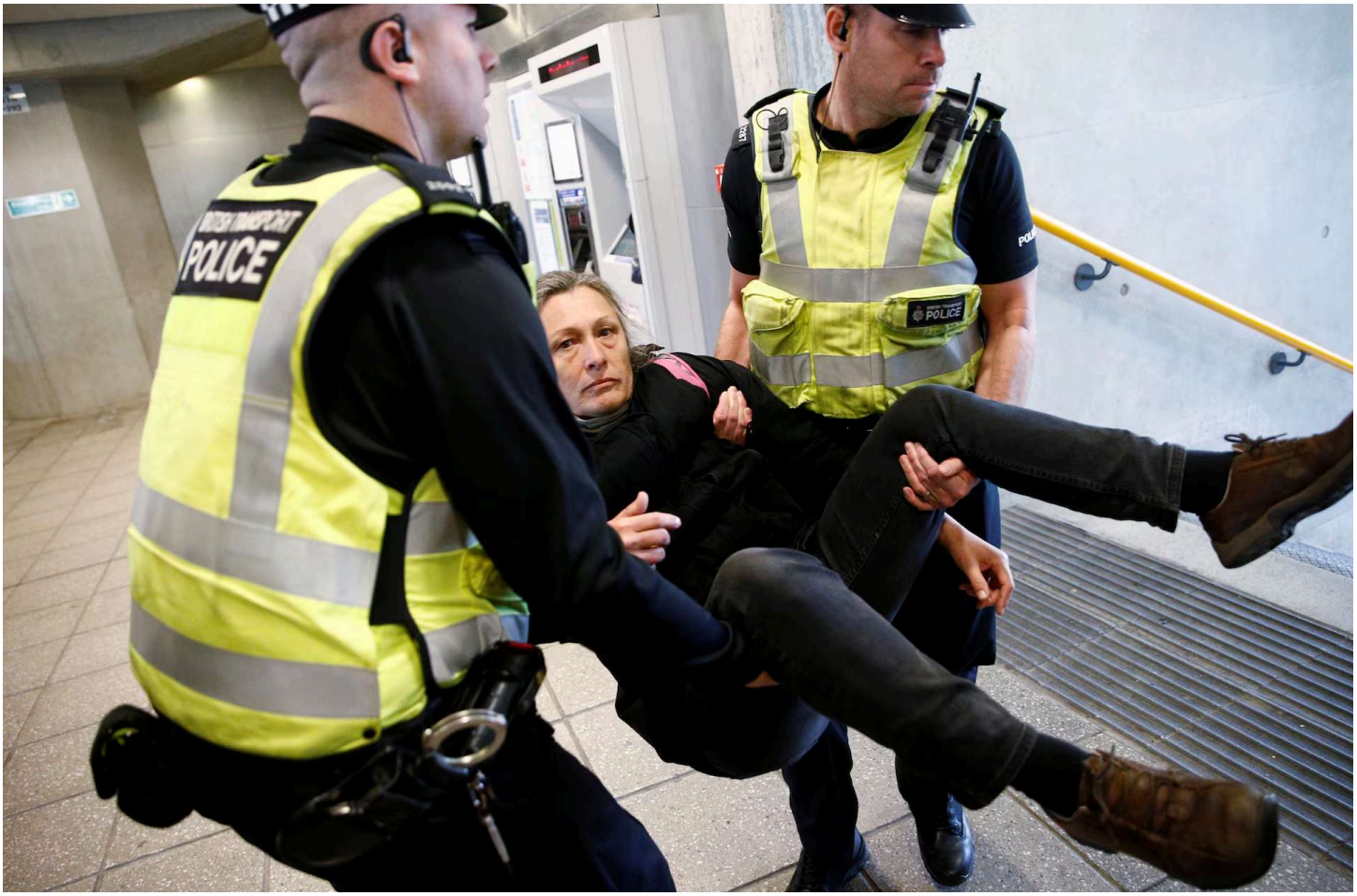

[8/20] Police officers detain Extinction Rebellion protester during a demonstration at London City Airport, October 10. REUTERS/Henry Nicholls

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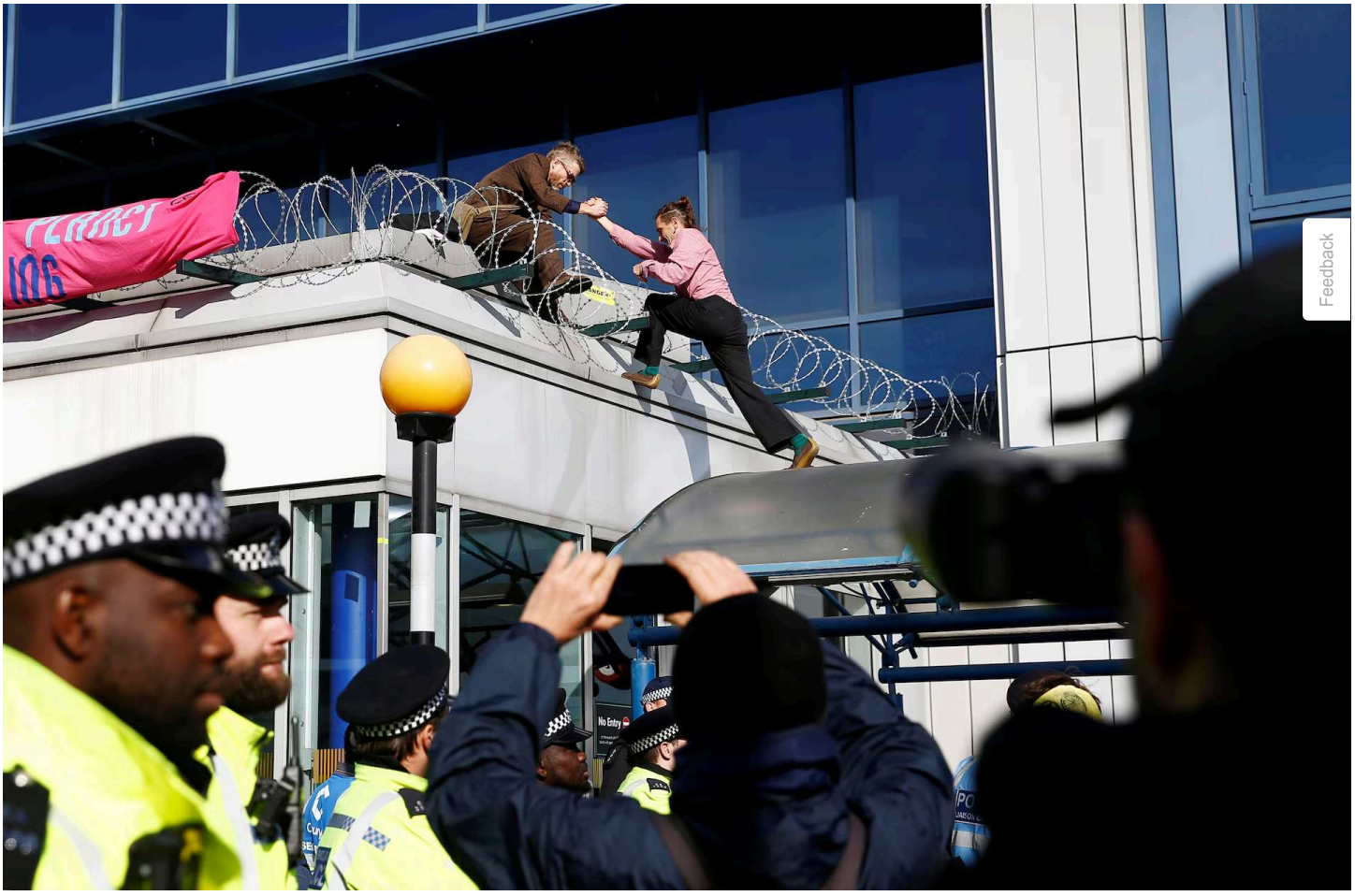

Feedback

[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

Share this photo



[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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Feedback



[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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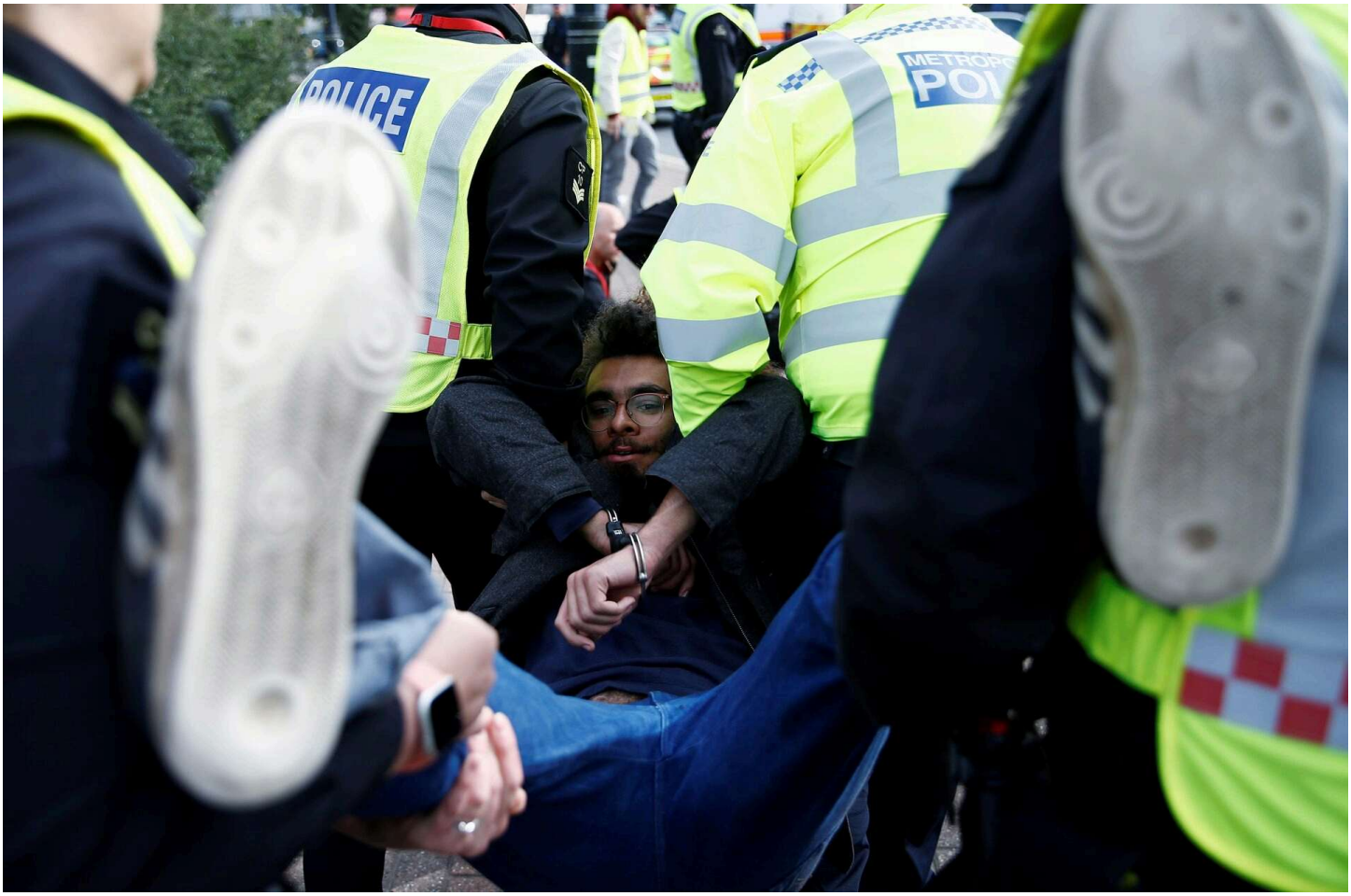
Feedback



[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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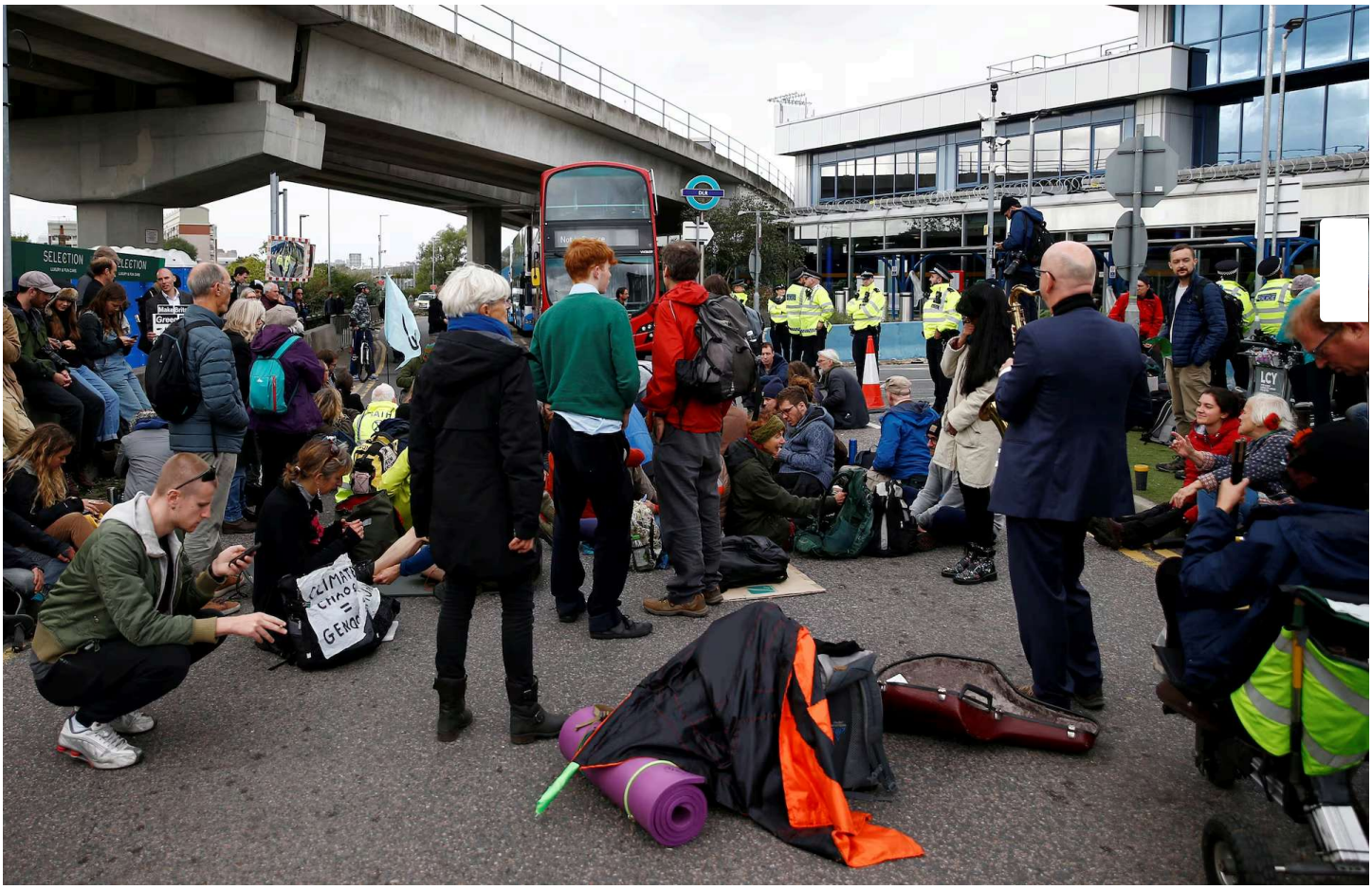

[13/20] Extinction Rebellion protesters block the road outside of the airport during a demonstration at London City Airport, October 10. REUTERS/Henry Nicholls

Share this photo



[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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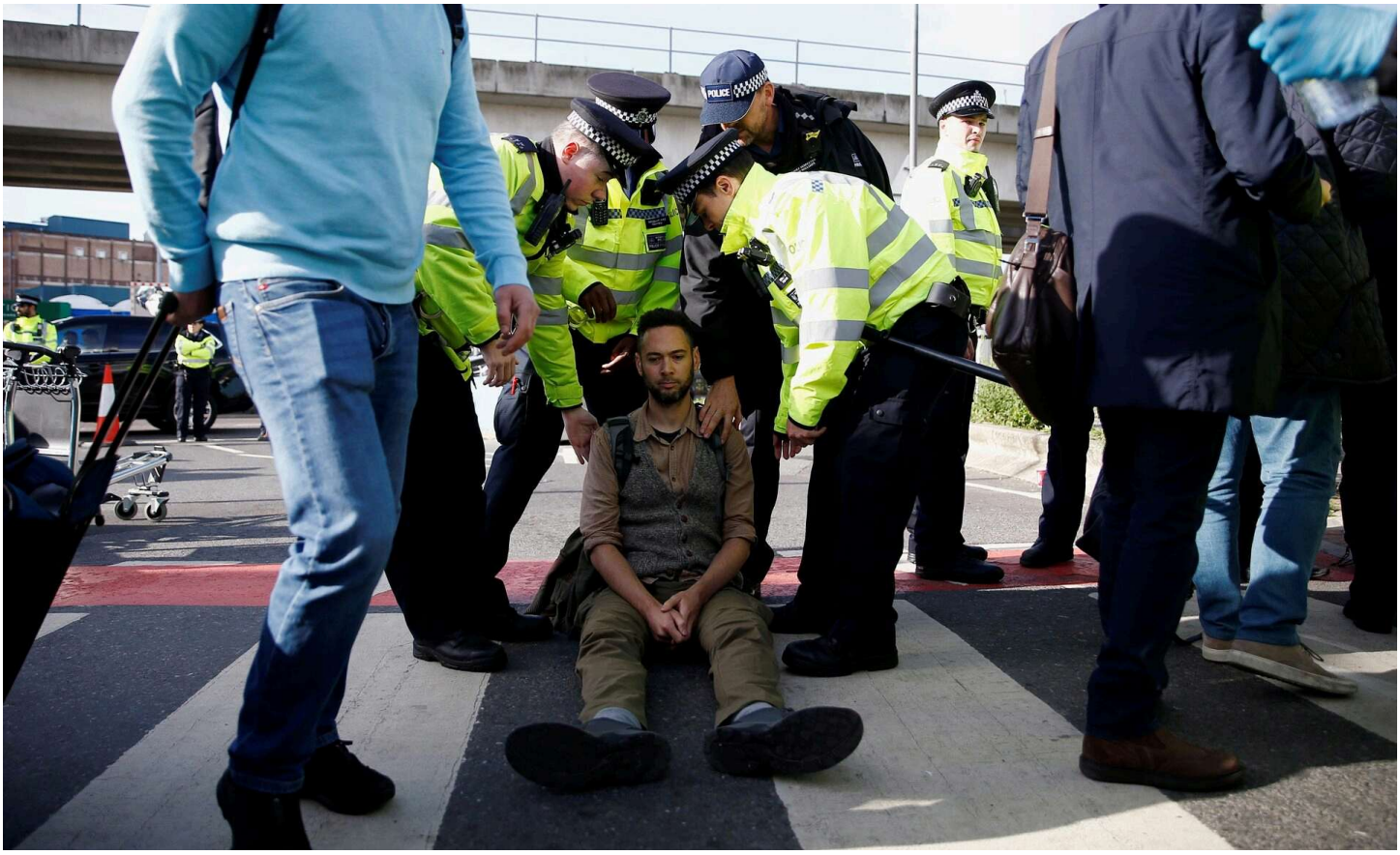

[15/20] Police officers detain an Extinction Rebellion protester during a demonstration at London City Airport, October 10. REUTERS/Henry Nicholls

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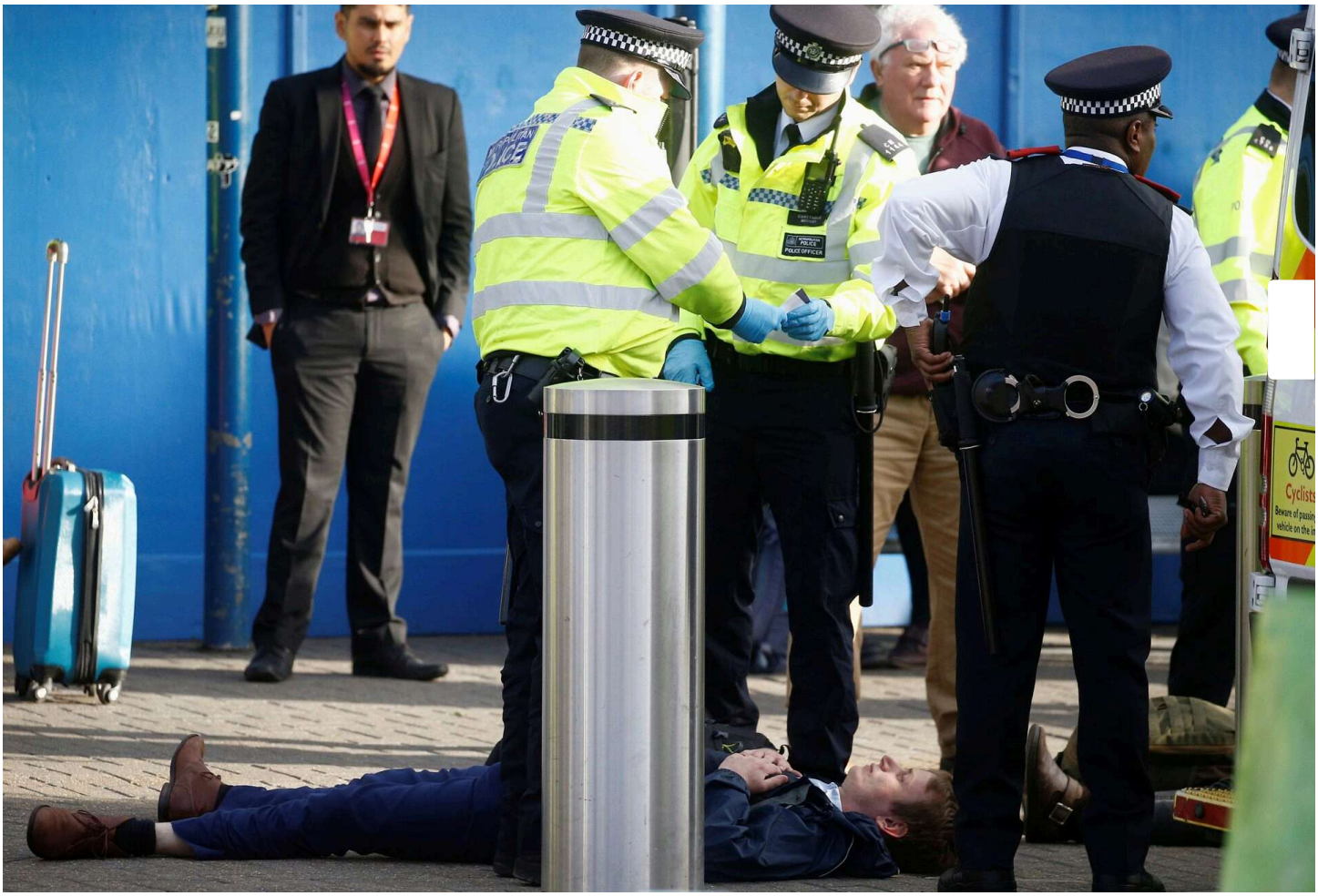


[16/20] Police officers detain Extinction Rebellion protestors during a demonstration at London City Airport, October. REUTERS/Henry Nicholls

Share this photo



[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

Share this photo



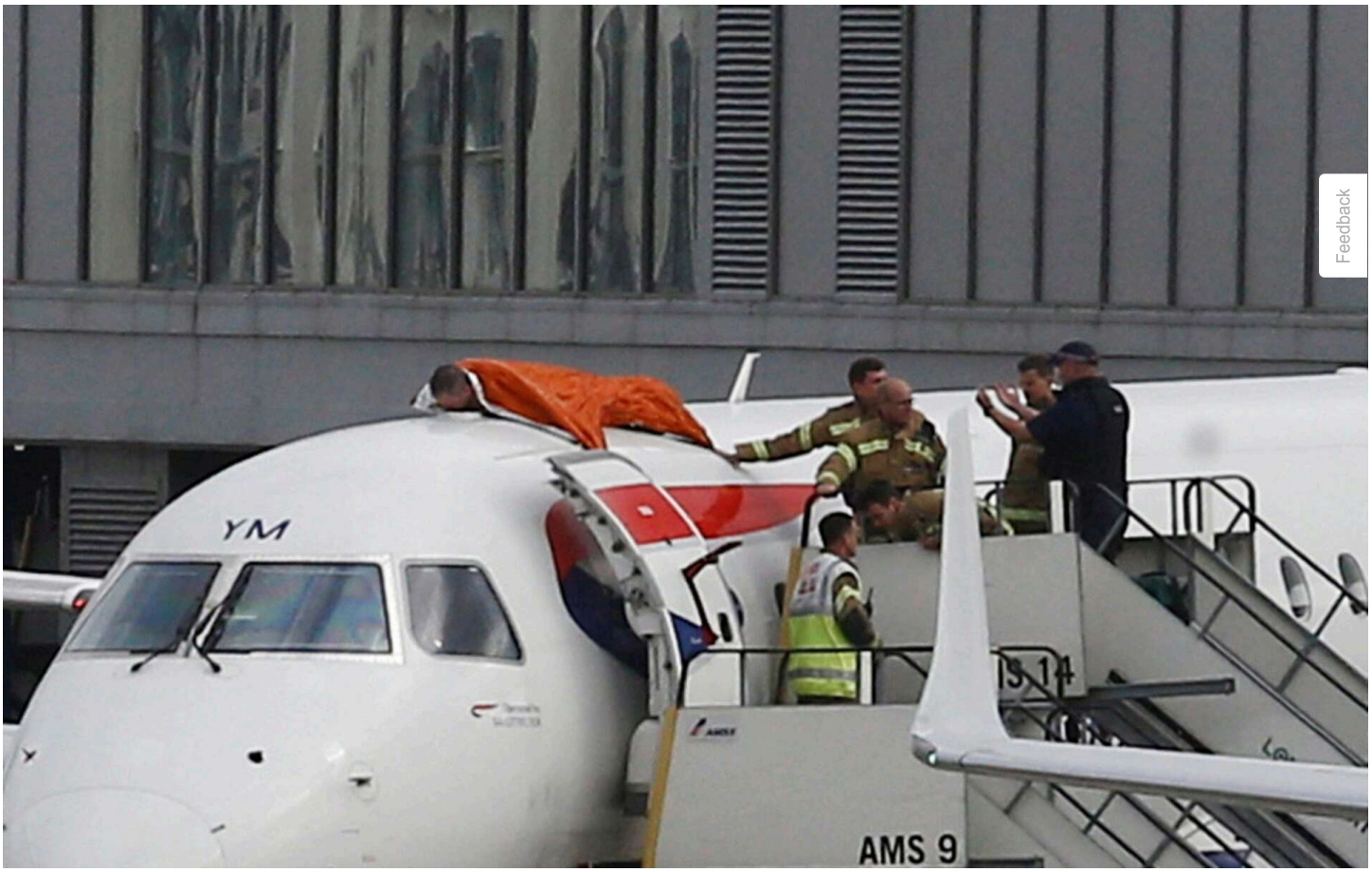
[18/20] Extinction Rebellion protesters with bikes block a roundabout during a demonstration, near London City Airport, October 10. REUTERS/Henry Nicholls

Share this photo



[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

Share this photo



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

Share this photo

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
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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)		

■

1

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

AJW10

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

Incidents from July 2025

Date of Event/press	Location	Brief details of event etc.	Link to source of informations
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.whtimes.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/dGFnOnJldXRlcnMuY29tLDIwMjY6bmV3c21sX01UMVNJUEEwMDBPRjlXU1k
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."



Extinction Rebellion outside Aviva, Pear Street, Sheffield.

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 it's 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.

Over the past 12 months, IOS has coordinated more than 150 actions, targeting 27 insurance firms in over 40 towns and cities. Now, the momentum is accelerating. From 2–14 July, a UK-wide Wave of Action will ramp up pressure on the insurers enabling climate destruction. Across the country, activists will expose the "dirty insurers" underwriting and brokering some of the world's most devastating fossil fuel projects—including the East African Crude Oil Pipeline (EACOP), Mozambique LNG, Arctic LNG 2, and Papua LNG.

Fossil fuel companies cannot operate without insurance. That makes insurers the hidden enablers of climate breakdown—profiting from disaster while claiming neutrality. But they're no longer in the shadows. They are a critical weak link in the fossil fuel chain—and campaigners are stepping up to break it.

GLOBAL PROJECTS, LOCAL CONSEQUENCES

EACOP is already displacing thousands in Uganda and Tanzania, violating human rights, threatening food and water supplies, and endangering protected ecosystems. LNG projects in Papua New Guinea, Mozambique, and the Russian Arctic are linked to militarisation, the destruction of Indigenous lands, and irreversible ecological damage [1, 2, 3, 4]. These are just a few of the 400+ carbon bombs currently in development [5].

But the impacts aren't confined to distant places.

"By backing these fossil fuel projects, insurers are not only fuelling climate breakdown and human rights abuses—they're also making life harder here in the UK," said Lucy Porter, a spokesperson for Insure Our Survival.

"When extreme weather floods our homes, when food prices surge, and when small businesses can no longer afford insurance, we must ask: who is enabling this chaos? Insurers who continue to underwrite new oil, gas, and coal projects are complicit—not just in destruction abroad, but in rising suffering at home."

LOCAL ACTION, GLOBAL RESISTANCE

Throughout the Wave of Action, communities across the UK will organise creative and disruptive protests outside the offices of targeted insurers and brokers. From city centres to rural high streets, IOS is calling on people to make visible the connection between fossil fuel insurance and the cost of climate chaos.



“Insurance giants like Lloyd’s, Liberty Mutual, AIG, Tokio Marine, Brit, Chaucer, and brokers like Marsh have the power to stop destructive fossil fuel projects like EACOP—but instead, they choose to back industries driving climate collapse, human rights abuses, hunger, war, and displacement.

Right now, 11 climate activists in Uganda have been brutally detained for speaking out against EACOP’s new funders. While insurers protect the profits of the richest 1%, communities around the world are paying the price—facing deadly heatwaves, floods, droughts, and devastation.

How long must we raise the alarm before they act? It’s time they chose people over profit, justice over destruction, and life over collapse. We can’t escape to Mars. This is our only home—and we will not stop fighting for it.”
— *Nicholas Omonuk, End Fossil Occupy Uganda*

WHAT’S NEXT: A GLOBAL ESCALATION

Following the UK Wave of Action, IOS will launch its international phase—escalating and expanding efforts worldwide. The campaign will work with global activists to confront dirty insurers and brokers in every region, turning scattered actions into a united front against the industry’s role in climate injustice.

“We don’t have 20 years to stop these projects. We barely have time to avoid irreversible collapse,” said Porter. “That’s why we’re escalating now—together, across borders, communities, and every dirty insurer’s threshold.”

📣 TAKE ACTION

- **Join the IOS Telegram** for updates, action support, and resources: https://t.me/+wV2EEWPpMJtlMzQ0
- **Visit the IOS website** and sign up to get involved: InsureOurSurvival.org
- **Socials**
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London Oxford Airport: Extinction Rebellion to hold protest

Oxford Airport

Environmentalists at Extinction Rebellion will be protesting at London Oxford Airport near Kidlington against private jets.

The group claim it is the “most energy-intense form of flying” at the airport formerly known as Kidlington Airport, claiming each jet will emit “substantially more carbon per passenger than commercial flights”.

Taking place on Saturday, July 5, protesters will assemble at 10am for a march from the west end of Kidlington High Street to the entrance of the airport.

They say the demonstration will be peaceful.

It comes after protesters from Palestine Action were widely condemned by national politicians after breaking into RAF Brize Norton overnight on Thursday, June 19 and sprayed red paint into the engines of two Airbus Voyager aircrafts and onto the runway.

This prompted Prime Minister Sir Keir Starmer to condemn the actions of the protesters as "disgraceful".

He added: "Our Armed Forces represent the very best of Britain and put their lives on the line for us every day. It is our responsibility to support those who defend us."

Now another stunt is planned in the county by the Extinction Rebellion group.

A file image of Extinction Rebellion protesters. Image: PA Freya Chambers, an activist with Extinction Rebellion Oxford, said: “As global temperatures continue to rise, now is the time to drastically cut emissions – starting with luxury private flights.

“Instead, the UK is now being hailed as the private jet capital of Europe.

“Oxford Airport is a hub for private flights by the wealthy elite, while the local community pays the price in pollution and an accelerating climate crisis.”

She added: “According to Civil Aviation Authority data, 13,774 private flights went to or from Oxford Airport in 2024.

“This is an average of 38 private jets every single day. At least 28 per cent of those were empty of passengers.

“These private jets are used like taxis by the super-rich to make short, one-way journeys within the UK and Europe.

“Globally, almost half of all private flights in 2023 were shorter than 500 km - that’s about the same as London to Edinburgh - and Oxford follows this trend.”

A general view of London Oxford Airport. Picture: Richard Cave She said the group is calling for an end to private jet travel, and that the increase in air passenger duty for domestic private jet travel introduced by the government “is not enough”.

“We need decisive action to decarbonise aviation, starting with stopping unnecessary private flights that only benefit the wealthy one per cent,” she added.

Thames Valley Police and Oxford Airport have both been contacted for further comment on the planned protest.

■

Extinction Rebellion protest outside insurance brokers



Members of XR North Lakes are out on the streets of Penrith today, protesting outside the offices of insurance broker Marsh.

The placard-waving protestors are taking part in a national day of action against insurance businesses which they say are "enabling" the fossil fuel industry by insuring high profile global projects.

Protests also took place at the offices of Marsh Commercial in Carlisle and Kendal.

Allan Todd, former teacher and climate activist, of Keswick, said: "Marsh is one of a number of insurance brokers which continue to facilitate fossil-fuel projects that drive the climate and ecological crises.

"Our action today is also part of the wider Road to Belem campaign, run by the Climate Justice Coalition in the run-up to COP30. We need to act now to avert the worst impacts of climate change and make the planet as habitable as possible for future generations."

This national week of action will be followed by an international wave of action in September, in solidarity with activists on the front line of the new oil and gas projects. ■

extinction rebellion
SCOTLAND

EXTINCTION REBELLION SCOTLAND AND SCIENTIST REBELLION DENMARK PROTEST PRIVATE JETS COMPANY, BLACKBIRD

February 16, 2025

Extinction Rebellion Scotland and Scientist Rebellion Denmark protested at Inverness Airport in Scotland and Billund Airport in Denmark. They were highlighting the contradictions between Blackbird Air's CEO Anders Povlsen private jets enterprise and his Wildland commitment to nature.



Credit: Siobhan Chalmers @_schal

Protesters waved banners outside Inverness Airport in Scotland declaring 'Ban Private Jets' and 'Blackbird Nae mAir' accompanied by others dressed as "blackbirds". A huge banner was laid on the ground with words from the Wildland Ltd. company website "We're in a climate emergency. We need to step up and take action".

Watch Chris Packham's message to the protest.

The protestors were calling for Anders Povlsen "to step up and take action", close down Blackbird Air and invest in clean transportation.

The protests were connected by an innovative two-way live link displayed on monitors at both Inverness Airport and at the Blackbird HQ in Billund Airport Denmark.

XR Scotland and SR Denmark call into account the contradictory behaviours of a so-called "eco-billionaire". One of the largest landowners in Scotland, Povlsen owns Blackbird Air, a luxury private jet business which is set to expand. At the same time Povlsen operates Wildland, a private enterprise which acknowledges the urgent need to act on the climate emergency.



Credit: Siobhan Chalmers @_schal

The use of private jets has soared in recent years, with the resulting climate-heating emissions rising by 50%. Passengers in larger private jets caused more CO2 emissions in an hour than the average person did in a year. Aviation fuel remains untaxed while those using a car to get to work pay their taxes at the pumps.

The aviation industry is promoting Sustainable Aviation Fuel (SAF) but the UK SAF mandate only requires that 2% of the UK's total jet fuel demand be met by SAF in 2025, increasing to 10% in 2030. SAF is always blended with fossil fuels as around 65% of so-called sustainable fuel is kerosene.

However, some airlines and countries are changing. The Danish company, Lego, is closing its private jet division this year. Amsterdam's Schiphol airport announced a ban on private jets in April 2023. Belgium has introduced new taxes on private jets and France is expected to follow.

Dr Sarah Birkby from Extinction Rebellion Highlands and Islands and Moray said:
'It is completely contradictory to state the importance of acting on the climate emergency and at the same time run a private jet company. The time when people, no matter how rich, could say one thing and do the exact opposite is over. As Wildland Ltd itself declares, we need people to step up and take action".

Dr Anthony Graham from Scientists for Extinction Rebellion stated:
"The evidence is clear: our current emissions pathway is incompatible with a safe planet. Every tonne of CO2 fuels climate change, yet private jets – used by the wealthiest 0.003% – emit disproportionate amounts, worsening both the climate crisis and inequality. Scientists for Extinction Rebellion urge action on luxury emissions, stressing that those with the most power must lead by example."

Finlay Asher, a spokesperson for Safe Landing, a global community of aviation workers, said:
"At Safe Landing, our aviation community are firmly of the position that there needs to be a rapid reduction in private jets in favour of cleaner and greener forms of travel. And as a Scottish aerospace engineer, I'd love to see Scotland lead the way and pioneer the genuinely sustainable future of flight. Rather than catering to carbon-intensive flying for an elite minority, Inverness Airport could instead become our green gateway for essential island air travel."

Alex Cochrane from Extinction Rebellion Scotland said:
"Private jets are the quickest way to burn fossil fuels and produce on average 10 times more CO2 emissions per passenger than commercial flights. Though Blackbird Air states on their website 'Our private jets feature the latest safety innovations and energy-efficient engines', the aviation industry expects worldwide another 8,500 private jets will enter service by 2033 (including Blackbird), far outstripping any efficiency gains."



Climate Activists Detained at the “Oscars of the Insurance Industry”

July 09, 2025 by Extinction Rebellion

Early images

“INSURING DISASTER, NOT SURVIVAL”

LONDON 9th July — Climate activists with the Insure Our Survival campaign disrupted the “Oscars of the insurance industry” British Insurance Awards at the Royal Albert Hall tonight, calling out the industry for profiting from climate chaos and genocide in Gaza, while pushing ordinary people to the brink.

Two activists were detained for several hours after getting into the venue and planning to take to the stage to drop a banner. Both have now been released and stand by their actions, saying: "Stop funding ecoside. Stop funding genocide."

As the insurance elite gathered to celebrate their accomplishments this year, activists outside held a die-in on the red carpet, making it hard for attendees to enter. They added a theatrical "F***ing Up the Planet Awards" mocking the biggest insurers for backing oil pipelines, displacing communities, insuring arms exporters and ignoring the climate science.

"These companies talk about resilience, but they're the ones insuring oil pipelines while dropping cover for flood-hit homes," said Lucy Porter, a spokesperson for Insure Our Survival. "They're not part of the solution — they're complicit in the collapse."



Photo credit: Denise Baker

The income made for those in the industry does not come without a cost, at home and abroad. Even in their own communities, we are seeing flooding and destruction of homes. 5.7 million properties in England are currently at risk of flooding [1]. In 2024 alone, the UK saw over £1.6 billion in insured flood losses, with thousands of families displaced [2]. In Yorkshire, Cumbria, and South Wales, some households now face £2,000+ annual flood insurance premiums — or have been refused coverage entirely [3]. Meanwhile, insurers continue to back new fossil fuel infrastructure that worsens

the crisis, including the East African Crude Oil Pipeline (EACOP) and Arctic LNG 2 [4] [5].

AXA and Allianz have come under fire for financial and insurance ties to firms complicit in the Israeli occupation of Palestine, including companies supplying bulldozers, weapons, and surveillance tech used in home demolitions and military operations [6] [7].

“They insure against the destruction of homes abroad, and then leave homes here unprotected,” said another campaign spokesperson. “Their business model is a disaster — so long as it doesn’t affect their balance sheets.”

BRITISH INSURANCE AWARDS: A CELEBRATION OF CLIMATE HYPOCRISY

While the British Insurance Awards claim to reward “innovation and responsibility,” many winners continue to underwrite fossil fuel expansion — a direct violation of international climate goals [8].

Insurers and brokers being called out include:

- Lloyd’s of London — still insuring coal, tar sands, and Arctic oil through its syndicates [9].
- Chubb, AIG — major underwriters of extreme oil and gas projects around the world [10].
- AXA — linked to fossil fuel underwriting and arms-related human rights concerns [6].
- Marsh McLennan — brokers fossil fuel deals including pipelines and coal plants [11].

Many insurers at the British Insurance Awards — including Allianz, Aviva, AXA, Zurich, AIG, RSA, Chubb, QBE, and Liberty Mutual — are not only complicit in climate chaos, but also profit from militarised violence.

They insure or invest in companies supplying military equipment to Israel, including:

- Boeing
- Lockheed Martin
- Elbit Systems
- Maersk (used in military logistics) [12][13][14]

INSURE PEOPLE, NOT POLLUTION

This crisis is personal. Flooding, fires, and heatwaves are here, and insurers are abandoning households while enabling destruction abroad.

It's time to turn public anger into action.

👉 Join the campaign. Demand insurers drop fossil fuels.
👉 Expose their hypocrisy.
👉 Insure our survival — not collapse.

🔗 **[Insure our Survival website]**

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XR Global website | Discover what's going on in XR around the globe

Time has almost entirely run out to address the climate and ecological crisis which is upon us, including the sixth mass species extinction, global pollution, and increasingly rapid climate change. If urgent and radical action isn't taken, we're heading towards 4 ° C warming, leading to societal collapse and mass loss of life. The younger generation, racially marginalised communities and the Global South are on the frontline. No one will escape the devastating impacts.

Extinction Rebellion target Howden and Marsh offices in Shrewsbury

'We need insurers to stop making things worse and step up to be climate heroes,' says protester

Extinction Rebellion targeted the offices of brokers Marsh and Howden in Shrewsbury in an insurance-related protest.



The group went to Marsh's office in Abbey Foregate at 10am on 11 July 2025, before marching up Wyle Cop to visit Howden's branch on the High Street.

The protest was related to fossil fuels, with protesters calling for the support of new projects to be ended. It featured placards, banners and a Grim Reaper,

One protester said: "Here in Shrewsbury we're already feeling the effects of climate breakdown.

"Shropshire farmers are struggling with the current drought. Homes and businesses are suffering as once in a hundred year floods now happen annually.

“We need insurers to stop making things worse and step up to be climate heroes.”

Other protest

The protest came amid supporters of Extinction Rebellion’s Insure our Survival campaign targeting the offices of insurance companies up and down the country in a national wave of action last week.

During the week, Marsh’s Manchester office in Belvedere, Booth Street, was also targeted, with protesters holding a large Stop Eacop (East African Crude Oil Pipeline) banner.

Eacop is a pipeline that is set to transport oil produced from Uganda’s Lake Albert oilfields to the port of Tanga in Tanzania.

One protester said: “We are already seeing the catastrophic effects of climate chaos on our TV screens.

“Instead of displacing poor people to pipe oil across Africa so that big oil can make even more money, we should be leaving it in the ground. Our message is simple – oil companies need to stop drilling and start paying.”
■

Rebels target insurance HQ in solidarity with detained Ugandan protesters - Extinction Rebellion UK



Rebels target insurance HQ in solidarity with detained Ugandan protesters

July 16, 2025 by Extinction Rebellion

Press contacts: Dorothea Hackman 07710 269195 | XR UK press team 07756136396

BREAKING PHOTOS | PERMANENT ARCHIVE

Extinction Rebellion rebels target AIG as part of a national wave of Insure Our Survival actions against insurance companies fanning the flames of climate risk.

At 12 noon today, July 16th, 2025, protesters were at the offices of AIG in Fenchurch Street, London, demanding it does not insure the East Africa Crude Oil Pipeline (EACOP).

Two letters were delivered – one on behalf of local people directly affected by EACOP and another from the #StopEACOP campaign UK.



Outside AIG, activists in red #StopEACOP suits held a die-in by an EACOP pipeline, and others waved fans declaring 'FANNING THE FLAMES OF CLIMATE RISK' while throwing documents entitled 'UNDERWRITING FOSSIL FUELS' and 'INVESTING IN FOSSIL FUELS' into a mock fire.

Zaki Mamdoo, Campaign Coordinator at StopEACOP said: "Activists and defenders outside AIG's offices today stand shoulder-to-shoulder with communities whose lands, livelihoods, and futures have been sacrificed for the EACOP, its associated projects and the repressive conditions that have followed. This demonstration is a reminder that the destruction we face is not accidental; it is the result of a global system that prioritises profit over people, and places corporate power above human life. The struggle for climate justice demands that ordinary people everywhere confront the institutions responsible for this harm because those causing it operate globally, and so must our resistance."

73-year-old retired lecturer and grandmother from Camden Dorothea Hackman said: **"**Insurance companies like AIG wield immense power and could bring an end to the fossil fuel era. Instead, they collude with short-term profiteering polluters and fan the flames of climate risk."

As a result of global pressure, including from Extinction Rebellion, Insure our Future and the StopEACOP campaign [1], 30 major insurers have pulled out of EACOP to date[2]. However, AIG has still to rule out insuring EACOP.

EACOP is a 'carbon bomb' [3], which would unleash 379 million tons of climate-heating pollution – more than 25 times the combined annual emissions of Uganda and Tanzania the host nations. [4] This will fuel extreme weather worldwide and intensify deadly flooding, landslides, heatwaves, and droughts that are already frequent even in the UK [5].

Insurers are complicit in the climate crisis as oil, gas, and coal industries are legally obliged to insure their operations.

In addition to profits from underwriting insurance, client premiums represent immense funds for insurance companies like AIG – globally, £27 trillion of assets are under management, with UK insurers having £1.8 trillion, and much of this is invested in fossil fuels. [6,7]

This is an unsustainable contradiction. While their investment and underwriting continue to give a lifeline to the fossil fuel companies, already over a third of weather-related claims are for climate-attributed losses.[8]

Meanwhile, climate change is doubling or even tripling the cost of home insurance for ordinary homeowners [9] and coverage is denied to many households impacted by climate change.[10]

Yet the size of the renewable energy insurance market is still under 30 per cent of the fossil fuel insurance market.[11] This mismatch of priorities is an obstacle to the urgently needed transition to clean energy. [12]

EACOP has already displaced thousands of families in Uganda and Tanzania and is threatening food and water security and violating human rights, while disturbing critical ecosystems including Lake Victoria and Murchison Falls National Park [13, 14].

TotalEnergies, the majority shareholder and investor of EACOP, is accused by the UN special rapporteur on environmental defenders of 'grave human rights violations against those opposing the projects and against the local communities, particularly in Kingfisher'. [15]

At time of writing, 11 activists, the KCB11, have been detained and refused bail for 84 days for attempting to deliver a letter to Kenya Commercial Bank in Kampala.

"It's hard to imagine a more vivid picture of corporate-state collusion than activists being led into a trap and arrested for trying to share their concerns about a fossil fuel project characterised by rights and environmental harms," said Brad Adams, Executive Director at Climate Rights International.[16]

These national days of action in July will be followed by a wave of international action in September, in solidarity with activists on the front line of new oil and gas projects.

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■

Reading: Extinction Rebellion protest above A329 motorway

The Tax the Rich banner by Extinction Rebellion activists dropped above the A329M between Reading, Wokingham and Bracknell. *(Image: Extinction Rebellion)*

Two mystery banners were seen on a bridge over a busy motorway.

The banners above the A329M bore the slogan 'Your Planet Needs You' while the other said 'Tax the Rich,' and both have since been claimed by Extinction Rebellion.

"Heatwaves are becoming fiercer and more frequent, and not addressing the climate crisis will be far more costly than tackling it," said an Extinction Rebellion spokesperson.

"There is also a growing call for the super-wealthy to be taxed. According to Oxfam, a 2% tax on extreme wealth over £10 million could raise £24 billion every year.

"78% of the British public say they support this. Money raised could supercharge the UK's efforts to tackle climate change."

Greenpeace has called for a one-off "National Renewal Tax" of 2.5% on individual wealth above £10m, to be paid annually over the five years of this parliamentary term, which could raise between £130bn and £183bn. This tax would be paid by 0.1% of the UK population.

The National Renewal Tax on the super-rich could raise between £26bn and £36.6bn on average each year.

"Funds raised would be 'more than enough' to pay for insulating homes, supporting vulnerable households with winter energy bills, providing free bus travel to under 25s, implementing a scrappage scheme for polluting vehicles, retraining works for green energy jobs, upgrading ports, and supporting farmers to clean up waters and return land to nature," the spokesperson said.

"According to a new report, the potential UK economic losses by 2040 due to stranded fossil-fuel assets is £113bn.

"Of the £88bn held in fossil fuel assets by UK pension funds, around £15.2bn is at risk of stranding by 2040.

"Yet BP and Shell are backing off from their 'green' promises, and other fossil fuel companies are still pushing ahead with projects."

A growing number of climate groups are campaigning for the introduction of a wealth tax.

The Pay Up campaign is calling on the government to bring in a series of wealth taxes as an alternative to spending cuts.

Climate groups say the revenue from the ultra-rich could fund investment, restore crumbling public services and help tackle the climate emergency. Opponents have raised concerns that such a move would result in the ultra-wealthy leaving the country.

However, experts say there is no evidence of a mass millionaire exodus from the UK, with the overall number of millionaires and billionaires having risen steadily over the past two decades.

At the same time, the government has little idea of how many billionaires pay tax.
■

Extinction Rebellion protesters 'die' during demonstration at bank



XR protesters 'die' during a demonstration at Barclays in Oxford *(Image: XR Oxford)*



Scientists for XR occupy the Bank of England

July 23, 2025 by Extinction Rebellion

Press contacts: Shana 07546 166787 | XR UK press team press@extinctionrebellion.uk

Photos: https://drive.proton.me/urls/WFVCDS5XJR#OEow1XVNSOdf

Early on Wednesday 23rd of July, five scientists occupied the lobby of the Prudential Regulation Authority (PRA), part of the Bank of England.

Five scientists remained in the PRA's lobby from 8am until 9am, during the morning arrival of employees, demanding capital requirements on fossil fuels in the insurance and banking sectors. Three more offered flyers to staff inviting them

to an international network of financial regulators working for an end to fossil fuels expansion projects. [Signal link]

This protest took place during the second to last week of the PRA's public consultation on climate risk in insurance and banking, entitled 'Enhancing banks' and insurers' approaches to managing climate-related risks' [1]. The protestors argued that the PRA should be doing more to regulate these industries in a way that mitigates climate-related risks, by introducing capital requirements that would discourage providing financial and insurance support to the fossil fuel industry that is leading us ever deeper into climate catastrophe.

Capital requirements are the amount of liquid capital that must be held by a firm, reflective of the risk of their assets, in order to help protect the economy from collapse. Capital requirements on fossil fuels would deem these assets riskier and increase the manditory amount to be held, thereby discouraging the holding of these assets.

The scientists taking part insist that climate and ecological breakdown must be central to discussions around mitigating economic breakdown – allowing insurance and banking sectors to continue to insure and loan to fossil fuel companies does not follow scientific consensus or economic logic. Signs were held with calls to action, "Climate tipping points = economic risk. Stop new fossil fuels, capital requirements now" and "Ecosystem collapse is financial collapse, capital requirements for fossil fuels now".

Signs also quoted Günther Thallinger, Allianz SE board chairman from his March 2025 article 'Climate, Risk, Insurance: The Future of Capitalism' [2] stating "This is about saving the conditions under which markets, finance, and civilization itself can continue to operate. [...] There is only one path forward [...] burning less carbon or capturing it at the point of combustion."

"*Those that work in insurance and at the PRA, like us scientists, know how dire the situation is,*" said Shana, Space Engineer and occupier of the lobby. "*To talk about 'managing climate-risk' in regard to banking and insurance operations whilst ignoring the fact that these same firms are enabling new oil and gas projects is baffling. They're advising companies on how to manage a crisis that these same companies are actively contributing to – it's like giving fire safety training to the person lighting the flames. Instead of just managing risk we need to actively be mitigating risk – something the PRA can do through capital requirements on fossil fuels for banks and insurers.*"

The PRA, in its latest paper on climate risks in the financial sector, admits that most banks and insurance companies are not properly analysing their climate related risks, and the industry requires work at a governance level to better understand climate risks including climate scenario analysis (eg. unprecedented, non linearity, tipping points) to

fully capture future risks [1]. A recent article in the Financial Times quotes senior Bank of England staff who resigned over the deprioritization of climate and nature risks [3].

Capital requirements on fossil fuels is not as radical an idea as it may seem – the European Insurance Authority (EIOPA) recommendeds capital requirements on fossil fuels "to accurately reflect the high risks of these assets" [4] and capital requirements are mentioned in the PRA consultation paper's current iteration. However the PRA still states that no new capital requirements will be imposed on top of what is required now. This results in little financial incentive for banking and insurance firms to reduce their involvement in new oil and gas expansion projects, missing a vital opportunity to incentivise meaningful change in our financial sector.

[1] CP10/25 – Enhancing banks' and insurers' approaches to managing climate-related risks – Update to SS3/19, https://www.bankofengland.co.uk/prudential-regulation/publication/2025/april/enhancing-banks-and-insurers-approaches-to-managing-climate-related-risks-consultation-paper

[2] 'Climate, Risk, Insurance: The Future of Capitalism'
, https://www.linkedin.com/pulse/climate-risk-insurance-future-capitalism-g%C3%BCnther-thallinger-smw5f

[3] Financial Times: Bank of England staff depart after downgrade of climate risk, https://www.ft.com/content/c9919c02-8328-4fa0-af4d-a108770a9f73

[4] EIOPA recommends a dedicated prudential treatment for insurers' fossil fuel assets to cushion against transition risks, https://www.eiopa.europa.eu/eiopa-recommends-dedicated-prudential-treatment-insurers-fossil-fuel-assets-cushion-against-2024-11-07_en

About Extinction Rebellion

Extinction Rebellion (XR) is a decentralised, international and politically non-partisan movement using nonviolent direct action and civil disobedience to persuade governments to act justly on the Climate and Ecological Emergency.

Donate | Support our work
What Emergency? | Read about the true scale of the climate crisis
Why Citizens' Assemblies? | Breaking the political deadlock
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XR UK website | Find out more about XR UK
XR Global website | Discover what's going on in XR around the globe

Time has almost entirely run out to address the climate and ecological crisis which is upon us, including the sixth mass species extinction, global pollution, and increasingly rapid climate change. If urgent and radical action isn't taken, we're heading towards 4 ° C warming, leading to societal collapse and mass loss of life. The younger generation, racially marginalised communities and the Global South are on the frontline. No one will escape the devastating impacts.

Ten Greenpeace activists arrested after suspending themselves from bridge outside Edinburgh

The protesters dangled themselves 25m above the water line, stopping a tanker from delivering gas for 24 hours.

Saturday 26 July 2025 12:38, UK



Protesters suspended themselves from the Forth Road Bridge. Pic: Greenpeace

Ten Greenpeace activists have been arrested after suspending themselves from a bridge over a river to halt a tanker carrying fracked gas.

The Forth Road Bridge outside Edinburgh was closed on Friday due to the demonstration, with Police Scotland alerted shortly after 1pm.

The protesters ended up dangling around 25m above the water level at high tide.



The group said its activists had prevented the tanker from delivering gas. Pic: Greenpeace

Greenpeace announced it had ended the demonstration on Saturday morning, saying it had "achieved what we set out to do".

The group said its activists had prevented the Ineos tanker from delivering the gas for a full 24 hours, because the vessel could only travel to the Ineos petrochemical plant at nearby Grangemouth during high tides.

Its specially trained activists began climbing down their ropes on Saturday morning.

Greenpeace said all 10 descended safely and were voluntarily transported to Port Edgar in South Queensferry, where it said they were arrested by officers from Police Scotland on suspicion of culpable and reckless conduct.

Police Scotland confirmed five men aged between 35 and 40, as well as five women aged between 25 and 42, had been arrested.

It said further inquiries were ongoing and the Forth Road Bridge remained closed to traffic as of Saturday morning.

Read more:
25% of young children now malnourished in Gaza, charity says
Trump issues warning to leaders as he arrives in Scotland

Amy Cameron, programme director at Greenpeace UK, said: "By blocking Ineos, we've drawn global attention to the company's bottomless appetite for plastic production, false solutions and profit for its billionaire boss Jim Ratcliffe."

Describing the "plastic pollution problem" as "massive", she added: "Less than 10% of plastic is currently recycled globally, and this is set to rise to just 17% by 2060, while the amount of plastic we're producing is set to triple.

"The only solution is to address the problem at source which means securing a strong global plastics treaty that imposes legally-binding caps on plastic production."

Greenpeace insists its protest was safe and caused "minimal disruption".

It stressed the climbers had spent weeks training for the demonstration and pointed out the Forth Road Bridge carries low volumes of bus, cycle and pedestrian traffic.

Bank of England 'heist' as ministers face fresh anti-Rosebank oil field protests



Protesters outside the Bank of England. Photo: Fossil Free London

MINISTERS have faced a fresh protest against their possible renewal of permission for the Rosebank oil field, after the original decision was found to be unlawful in a landmark Supreme Court ruling last year.

Fossil Free London activists dressed as robbers emblazoned with the Norwegian flag staged a "heist" at the Bank of England on Monday evening to highlight the "daylight robbery" that approval of of the application for exploitation of the oil field would entail.

Rosebank is the largest undeveloped oil field in the North Sea. If its development goes ahead, this would lead to the release of carbon emissions equal to those produced by all of the world's 28 low-income countries, the activists said.

Chanting "Rosebank Oil is a scam. Labour, do you give a damn?" the campaigners carried sacks labelled "UK taxpayer money" filled with fake cash from a makeshift vault and held placards reading "£1.5 billion for Norway, net loss for UK."

Fossil Free London director Robin Wells said: "It's plain and simple, Rosebank is daylight robbery.

“If allowed, Equinor, a Norwegian oil giant, will rob us blind, hoarding massive profits for themselves and leaving behind nothing but a trail of climate chaos and a net loss for us.

“The UK government needs to stop this carbon bomb and act in the interests of the general public — scrap Rosebank and invest in a just transition.”

In January, the Court of Session in Edinburgh found that a Supreme Court ruling that planning authorities should consider the full climate impact of burning oil from new wells should apply retrospectively to the former Tory government’s decision to approve the Rosebank and Jackdaw oil and gas fields.

The environmental assessments for these projects did not count the greenhouse gases that would be released when the fossil fuels produced by them were eventually burned.

The January ruling said that work on both fields could continue while the new information was gathered, but no oil and gas could be extracted unless fresh approval was granted.

Ministers later confirmed that they would consider the significance of a project’s environmental impact, “while taking into account and balancing relevant factors on a case-by-case basis, such as the potential economic impact and other implications of the project.”

No decisions are expected until the autumn.

The Department for Energy Security and Net Zero was contacted for comment.

Morning Star for Peace and Socialism

Direct Action / 18 August 2025

Activists cut utilities to world's biggest fossil fuel investors declaring 'Summer of Sabotage'



Shut the System activists cut the electricity to Barclays' Barclaycard's Northampton headquarters, August 18, 2025

ACTIVISTS sabotaged utilities infrastructure at the offices of major fossil fuel investors today, declaring the start of “disruption like never before” against fossil fuel finance.

Shut The System cut cables and superglued electrical service cabinets at JPMorganChase and Allianz in London, demanding they stop financing the climate emergency and genocide in Gaza.

At Barclaycard’s Northampton headquarters, activists cut the 5G communications mast serving the building.

The underground climate campaign said the action marked the launch of a period of sustained sabotage against financial institutions deemed “key culprits” in the climate crisis, running until the end of September.

It urged civilians to join a “Summer of Sabotage” by destroying the property and operating systems of institutions providing “critical support to deadly industries globally.”

JPMorgan is the world’s largest fossil fuel investor, while Barclays is the biggest in Europe, according to a June report by Reclaim Finance.

And Allianz is the sixth-largest fossil fuel insurer and insures Elbit Systems, an Israeli arms firm supplying the majority of weapons used in Gaza.

A Shut The System statement said: “We have been forced underground by draconian anti-protest laws.

“The British state has recently shown how much they are willing to suppress peaceful protest.

“History shows direct action and sabotage are highly effective so we cannot stop while the climate emergency wages on and we see the most hopeful path forward is to operate beyond the state’s reach.”

The group has pledged to escalate its actions in October if demands are ignored.

Earlier this year, it cut fibre optic cables at insurance firms in Leeds and Birmingham, disrupted internet access, and carried out nationwide graffiti

actions at Barclays branches during its annual general meeting.

JPMorgan, Allianz and Barclays were approached for comment.

Extinction Rebellion 'unearth the truth' at Welwyn Garden City protest

The Welwyn & Hatfield Times

26 Aug 2025 13:00

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Author: Huw Richards
Print Edition: Welwyn Hatfield Times
Length: 391 words

Body

Extinction Rebellion claim to have "unearthed the truth" about a Welwyn Garden City insurance broker during a demonstration.

On Saturday, August 23, members of Hertfordshire Extinction Rebellion groups, dressed as oil workers and insurance executives, protested outside Howden Insurance in the town centre.

Extinction Rebellion members protest outside Howden, Welwyn Garden City. (Image: Derek Langley)

-The group called the protest due to its belief that Howden "supports the fossil fuel industry".

At the action on Saturday, an oil rig was set up outside the Howden branch, and members of the group dressed as oil workers allegedly "engaged" with Howden-s senior executives.

Phil from North Herts Extinction Rebellion said: "I hope people found our actions today both eye-opening and entertaining. Although there is widespread concern about the climate crisis among the public, the influence of the insurance companies on averting disaster may not be so well known.

"If a new oil or gas project can-t get insurance they simply can-t operate, so the insurance companies are in a uniquely powerful position.

"But companies like Howden are still actively supporting these industries, while at the same time home insurance premiums are doubling or even tripling to pay for the increased risks from extreme weather events like flooding and heatwaves. This is good business for them and a disaster for the rest of us."

(Image: Derek Langley)He added: "Many of us use Howden to insure our homes, cars, and even our pets. But they are secretly making millions by also acting as brokers for new oil, gas, and coal projects - despite dire warnings from scientists.

"We were asking Howden to do the right thing: pull the plug on insuring any new fossil fuel projects - this would send a powerful signal to the industry."

The demonstration was part of Extinction Rebellion's --Insure Our Survival" campaign, urges insurance companies to withdraw from insuring new fossil fuel operations which are believed to be worsening the climate crisis.

Insurance offices up and down the country have been targeted in a wave of nationwide actions, with activists demanding that key insurers stop backing destructive new fossil fuel projects and end their complicity in climate disaster and human rights abuses.

When contacted, Howden did not wish to comment.

(Image: Derek Langley)

Classification

Industry:
Insurance (92%), Insurance Overview (92%), Fossil Fuels (89%), Insurance Agencies & Brokerages (89%), Energy & Utilities (89%), Homeowners Insurance (78%), Property & Casualty Insurance (78%), Natural Gas Extraction (75%), Insurance Premiums (73%), Coal Industry (50%)

Subject:
Protests & Demonstrations (91%), Negative News (90%), Environmental Activism (90%), Negative Misc News (90%), Fossils (89%), Negative Environmental News (89%), Climate Change (89%), Severe Weather (88%), Environmental Accidents & Disasters (79%), Activism (78%), Negative Personal News (78%), Executives (77%), Floods & Flooding (73%), Heat Waves (68%), Weather (68%), Extreme Temperatures (68%), Human Rights Violations (63%), Human Rights (60%)

Climate protesters removed from Reform conference after heckling Nigel Farage

The protesters from Climate Resistance targeted the Reform leader to accuse him of working for super-rich donors.



A protester is removed from an address by Reform UK leader Nigel Farage during the party's annual conference (Jacob King/PA) (PA Wire)

Three climate protesters were carried out of the Reform UK party conference after shouting at Nigel Farage while he was on stage.

The protesters from Climate Resistance, a group calling for the government to tax the super-rich to fund public services and climate action, had planned to interrupt the Reform UK leader and Clacton MP during his keynote speech.

But he delivered it several hours earlier than originally planned after Angela Rayner resigned from the government.

They staged their protest as Mr Farage returned later to appear with special guest Preston Manning, the founder of Canada's now-defunct Reform party.

Climate Resistance targeted Mr Farage to accuse him of working for super-rich donors, such as property tycoon Nick Candy.

“You work for billionaires!” one shouted at Mr Farage.

Another said he was “paid by the super-rich to scapegoat migrants”.

Mr Farage paused to say: “Off you go, mate…boring!”

One shouted “f*** the fascists” and “tax the rich” as security guards carried her out.

The audience chanted “out out out” and booed her.

Sam Simons, spokesperson for Climate Resistance, said: “Farage will go on national TV and say how he cares about the people in the UK, and then vote to keep us from getting our sick pay.

“This grifter will scapegoat anyone just so we don’t talk about the oil barons and billionaire property tycoons who fund him.

“It’s really about keeping everyone so divided and downtrodden that we won’t even have time to think about taxing the super-rich.”

Mr Simons added: “Meanwhile, the super-rich are fanning the flames of climate collapse with their lavish lifestyles, and exploiting people and the planet for profit.

“The top 10% in the UK hold more wealth than all the rest of us combined, and pollute far more than ordinary people.

“The majority of Britain wants a wealth tax. It’s time to tax the super-rich and finally do what Reform never would: fund our schools, our hospitals, our climate and our futures.”
■

Campaigners around the country fight to stop Rosebank



CAMPAIGNERS to stop Rosebank took to the streets across the country on Saturday, protesting outside the offices of oil giants and in Prime Minister Sir Keir Starmer's backyard.

In Aberdeen, environmentalists joined forces with Scottish Palestine Solidarity Campaign (SPSC), protesting at the offices of Equinor and Ithaca to call for a ban on the development of the 300-million barrel field.

Speaking from the protest — one of almost 20 which took place around the country — Aberdeen SPSC activist, Kate Ramsden told the Star: "Rosebank isn't just an environmental disaster, Ithaca's involvement would generate hundreds of millions for Delek who are already literally fuelling the genocide in Gaza.

"Starmer needs to locate his conscience and stop Rosebank."

Four hundred miles away, campaign groups including Mothers Rise Up took that same message to the heart of Sir Keir's Holburn and St Pancras constituency.

Mothers Rise Up's Lorna Powell said: "Approving new fossil fuel projects like Rosebank in the context of an escalating, deadly climate crisis is simply unjustifiable."

The Department for Energy Security and Net Zero said its priority was to “deliver a fair, orderly and prosperous transition,” but could not comment on individual licences.

■

Two insurers named as targets in next Extinction Rebellion climate protest offensive

Two insurers are in the sights of Extinction Rebellion's next coordinated climate protest campaign

Insurers operating in the UK have been warned to expect a fresh wave of coordinated climate protests in September.

Activist group Extinction Rebellion (XR) has confirmed plans to target companies it says are enabling fossil fuel projects and arms trading.



Its campaign – dubbed *Insure Our Survival* – is set to run from 8 to 22 September 2025, with large-scale demonstrations confirmed for London on 8 and 9 September and further actions planned nationwide.

XR said the campaign would include coordinated actions in Europe, the Americas, Africa and Asia, with groups in the Global North working alongside those in the Global South to "amplify frontline voices" opposing fossil fuel and arms financing.

Targeted insurers

XR said the campaign will focus on international firms Axa and AIG, saying the call for action is an effort to draw attention to the broader insurance sector's role in underwriting high-carbon and defence projects.

The group claims fossil fuel and arms insurance represent just 2% to 3% of targeted firms' portfolios, arguing they could be removed without material financial harm.

Insurers have faced increasing scrutiny from climate campaigners in recent years, with several large players adopting restrictions on coal, oil and gas underwriting in response to public and shareholder pressure. However, XR maintains that such commitments remain inadequate to meet climate goals.

The September actions will form part of XR's ongoing global pressure campaign, which the group says will continue until targeted insurers commit to stopping fossil fuel and arms underwriting.

■

Protesters project ‘toxic’ images onto insurers’ City offices

‘Axa and AIG present themselves as protecting homes and families, yet continue to underwrite projects that accelerate climate breakdown and fuel conflict,’ says spokesperson

Activists staged protests at the City of London offices of Axa and AIG yesterday (8 September 2025), blocking access to the buildings and calling on insurers to stop underwriting fossil fuel and defence-related risks.



The demonstration formed part of a two-week wave of coordinated global actions led by campaign group Insure Our Survival, which is planning protests across more than 30 cities worldwide between 8 and 22 September. Demonstrations are also scheduled in London for today.

According to organisers, the London blockade began around 8am outside Axa’s offices, with campaigners dressed in suits and gas masks carrying placards urging a boycott of Axa and AIG. Activists also threw fake blood-stained £50 notes and projected images onto buildings as part of the action.

The campaigners accused both insurers of profiting from fossil fuel expansion and from companies linked to armed conflict. They argued that such underwriting activities account

for less than 2% of global insurance profits, suggesting that insurers could exit the sectors without significant financial impact.

Lucy Porter, UK spokesperson for Insure Our Survival, said: "Axa and AIG present themselves as protecting homes and families, yet continue to underwrite projects that accelerate climate breakdown and fuel conflict."

Carbon boycott

Yesterday's London action followed a weekend of projection protests at Axa and AIG offices in London, Paris, Cologne, Johannesburg, Manchester, Glasgow, Auckland and Ipswich. Images of senior executives wearing gas masks were projected onto buildings, which campaigners said symbolised insurers' exposure to "toxic" industries.

Research cited by organisers alleged that Axa holds investments in fossil fuel firms linked to so-called "carbon bomb" projects, including coal, oil sands and shale operations. At the same time, AIG has been identified as one of the world's largest coal insurers with more than $24bn (£17.73bn) invested in fossil fuel-related assets as of 2022.

Extinction Rebellion (XR) previously occupied AIG's office in London on October 30, 2024.

Speakers from climate and political groups, including Palestine-focused organisations, also scheduled addressed the demonstration throughout the day.

Insure Our Survival said it is also encouraging consumers and businesses to boycott other large insurers, including Allianz and Aviva.

Extinction Rebellion (XR) previously protested at the Premiership rugby final on June 14, 2025, to demand that the Rugby Football Union (RFU) end its sponsorship deal with Allianz.

■

Extinction Rebellion protesters stage ‘die in’ at Barclays Bank in Reading



Protesters from Extinction Rebellion performed a 'die-in' at Barclays Bank in Reading to link fossil fuel funding to climate change and global deaths.

Extinction Rebellion says: "Around the world, millions of people are dying as a result of heatwaves, wildfires, torrential rain, drought, flooding and landslides, all caused by changes in our climate brought about by the constant increase in greenhouse gas emissions.

"Barclays Bank is still funding fossil fuel projects which contribute to climate change, thus indirectly contributing to the deaths of humans and wildlife.

"Analyses from the World Weather Attribution organisation show that extreme weather is becoming more likely due to climate change.

"Heatwaves are the deadliest type of extreme weather globally, contributing to at least 500,00 deaths a year, including some in the UK. Researchers from the London School of Hygiene & Tropical Medicine (LSHTM) and Imperial College London, estimate that high heat killed 2,300 people across 12 major cities as temperatures soared across Europe this summer. They attributed 1,500 of the deaths to climate breakdown, which is heating the planet and making the worst extremes even hotter."

Dr Ben Clarke, researcher at the Centre for Environmental Policy at Imperial College London, said: "Heatwaves don't leave a trail of destruction like wildfires or storms. Their impacts are mostly invisible but quietly devastating – a change of just 2 or 3C can mean the difference between life and death for thousands of people.' He warned that countries need to speed up the transition from fossil fuels to renewable energy.

Greece, Turkey and Cyprus suffered devastating wildfires. Greece experienced a heatwave above 45C, drought and strong winds. At least 17 lives were lost, including 10 firefighters and rescue workers.

An intense two-week heatwave in Norway, Finland and Sweden was hotter, with temperatures of 30C and more, resulting in many more hospital admissions.

A new study, published in the medical journal JAMA, links more than 400 additional deaths to the wildfires in Los Angeles earlier this year. The study comes as hundreds of wildfires burn across the US and Canada.

Climate change not only increases the risk of wildfires around the world but also makes them particularly explosive. Relatively small blazes rapidly "blow up" so suddenly and with such ferocity that they become difficult to control.

Climate change also intensified heavy monsoon rain in Pakistan, which suffered its worst floods on record, killing hundreds of people.

In late June 2025, several days of heavy rainfall swept across Colombia and Venezuela, causing widespread flooding, overflowing rivers, and numerous landslides, one of which killed 27 people.

Moscow suffered its worst flooding since 1879, with some parts experiencing far more than the monthly average.

These extreme weather events will only continue to become worse if governments do not do more to reduce emissions from greenhouse gases such as carbon dioxide and methane·

Extinction Rebellion will pose as dead bodies (a 'die-in') to remind people of how they say that Barclays continues to fund projects that are contributing to over-heating planet Earth. Extinction Rebellion also says that they also hope to encourage visitors to the branch to move their accounts from Barclays to other banks with much 'greener' credentials.



■

Extinction Rebellion protestors spotted in Ipswich

Ipswich Star

15 Sep 2025 11:27

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Author: Paris Maben-Hume
Print Edition: Ipswich Star
Length: 271 words

Body

Extinction Rebellion protestors were seen outside a block of offices in Ipswich.

Local activists for the environmental movement in the Suffolk town and nearby Colchester are taking part in a coordinated global campaign targeting insurance giants AXA and AIG.

The campaign started on September 8 and will run until September 22.

It is calling for a boycott of the insurance giants and their sub-brand and is urging people to switch providers.

READ MORE: School pledges 'rapid' change after being issued with government warning

The protestors held up banners outside the entrance to the office block(Image: Newsquest)

On Monday morning, Extinction Rebellion Ipswich was protesting outside the AXA building at Brooke Lawrence House in Civic Drive.

The group held up banners which read: "We are all vulnerable. Stop insuring fossil fuels."

Blue and white tape saying "climate crime scene" was put up on the entrance steps to the office block.

They also handed out flyers to passers-by and AXA staff.

READ MORE: Hundreds of staff at housing association have data leaked in payroll breach

Tina, from Extinction Rebellion Ipswich, said: "Ipswich is on a tidal river, so people are already living with the risk of flooding, and this will only get worse as the climate gets hotter.

"New homes have just been built along the riverside. How long will it be before these become uninsurable?

"Knowing that AXA is not only profiting from these crises but exacerbating them while claiming to protect us is outrageous.

"As we have a large AXA office here in Ipswich, I thought it was important to join this global campaign to highlight this issue locally."

Classification

Industry:
Insurance (90%), Insurance Overview (90%), Energy & Utilities (73%), Data Breaches (66%), Fossil Fuels (54%)

Subject:
Negative Misc News (93%), Environmental Activism (92%), Protests & Demonstrations (91%), Negative News (90%), Activism (90%), Community Activism (90%), Environmentalism (78%), Environment & Natural Resources (78%), Negative Personal News (78%), Government & Public Administration (71%), Negative Technology News (68%), Rivers (66%), Data Breaches (66%), Crime, Law Enforcement & Corrections (53%)

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Wash It Off: Private jet sprayers found guilty



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 today. They took action with Just Stop Oil to demand the UK government negotiate a treaty to phase out oil and gas by 2030. [1]

Jennifer Kowalski, 29, from Dumbarton, and Cole Macdonald, 23, from Brighton, had cut through the wire perimeter fence and sprayed paint from a fire extinguisher onto two private jets parked at Stansted Airport, just hours after Taylor Swift's plane had landed. [2]

After the 4 day trial the jury returned a unanimous verdict of guilty. Sentencing will be on the 27th of October.

During the trial, the prosecution argued that extensive professional cleaning was required for the two planes after the action. The total cost of cleaning was assessed to be around £12,000.

The defendants told the jury they did not set out to cause damage. They explained that they had deliberately avoided spraying the engines and cockpits and believed the diluted

paint would wash off easily. They argued that they lacked the necessary criminal intent: they neither intended to cause damage nor realised that damage was a likely consequence of their actions.

In her defence Jennifer Kowalski explained that the action had been designed to target Taylor Swift's plane because of her personal interest in the famous singer and the immense influence that she carries. She said:

"She's one of the most famous people in the world; she's talked about everywhere, she's the only singer ever to be named Time Magazine Person of the Year; she earned 2 billion dollars last year; reporters devote their lives to covering her; if we devoted that much energy to tackling climate change we could change things.

"I thought a lot about what she might say – if we could get her attention – if she saw this it might get a reaction from her, from a place of care from a fan, instead of from a place of apathy – she's famous for saying how much she loves her fans, and yet her fans are dying because of climate change."

At trial, Judge Mill ruled that the damage was too serious for the rights to free expression and assembly under Articles 10 and 11 of the European Convention on Human Rights to apply. As a result, the jury was not asked to consider whether a restriction on the defendants rights to protest was proportionate response in the light of the alleged damage, and that defence was blocked from the trial.

Following the verdict Cole MacDonald said:

"We were released from remand the day before the general election that elected a left wing government and that under that government the country has slipped into fascism and has become continually more corrupt."

Jennifer Kowalski said:

"I broke into Stansted airport to spray paint Taylor Swift's private jet because this is a dangerous time – the era of global boiling. This era will not end when it's time for a new album – it's the era to end all others.

"*When I look out people's windows, I see entire settlements swept off the map and thousands killed by climate disasters. On this reckless path 1 billion people will be displaced by 2050. When you strip people of their basic rights and cram them into perilous conditions violence inevitably ensues.*

"But it's not too late to be brand new. I just think you are what you love. And I'll fight for the music and people I love. Won't you?"

While two young people face an uncertain penalty for taking action targeting private jet use, it is estimated that 80% of the world's population has never taken a flight. Just 1% of people cause 50% of global aviation emissions and private jet users are responsible for up to 14 times as much carbon emissions compared with a commercial flight. A single flight in a private jet can easily emit as much carbon dioxide as the average annual carbon footprint for an EU citizen – 8.2 tonnes. Private aviation contributed at least 15.6 Mt CO_2 in direct emissions in 2023, or about 3.6 t CO_2 per flight. Almost half of all flights (47.4%) are

shorter than 500 km. Private aviation is concentrated in the USA, where 68.7% of the aircraft are registered. [3] [4] [5][6]

Morning Star for Peace and Socialism

Scotland / 22 September 2025

Insurance giant accused of 'keeping killers safe' at Glasgow protest



Protesters outside AXA offices. Photo: Extinction Rebellion Scotland

Stop Rosebank



Any day now, the UK government will face a major climate test. Equinor is expected to reapply to develop Rosebank: the biggest undeveloped oil field in the UK.

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Activists disrupt BP panel over hurricane-fuelling profits



[Pic: Fossil Free London]

ACTIVISTS have disrupted a panel event featuring senior BP executive Stewart Macfarlane, as the oil giant announced quarterly profits of $2.2 billion (£1.7bn), surpassing analysts' forecasts.

Campaigners from Fossil Free London interrupted the discussion on Tuesday evening, chanting: "As Hurricane Melissa tears down lives, do your profits help you sleep at night?" before being escorted out of the event hosted by the Association of International Energy Negotiators at Simmons & Simmons LLP's London office.

The protest came just days after Hurricane Melissa devastated Jamaica, with scientists warning that the climate crisis intensified the storm's impact.

BP has faced mounting criticism after scaling back its climate commitments.

Earlier this year, the company increased its annual investment in oil and gas to $10bn (£8.2bn) while cutting more than $5bn (£4.1bn) from its low-carbon spending plans.

A Global Witness analysis found that the rollback could cause around 72,000 additional heat-related deaths worldwide by the end of the century.

Fossil Free London director Robin Wells said the BP profits show that the company's "green mask has slipped to reveal the oily mouth behind," accusing the firm of fuelling global destruction while "CEOs and shareholders wine and dine in luxury."

■

Campaigners disrupt Oil Executive awards dinner in London

To highlight damage caused by the oil and gas industry, campaigners from Fossil Free London interrupted the World Energy Council Assembly's dinner at the Hilton in Mayfair on 3 December.

Oil and gas executives had gathered to present and receive industry "achievement awards". Award nominees and attendees included Shell, BP, and Ithaca Energy.

Campaigners chanted "no awards for climate criminals", as they were dragged out of the building by security.

The protest comes after devastating flooding has killed at least 1,250 people across much of southeast Asia in recent days. Human-caused climate breakdown has increased the intensity of such extreme weather events.

Oil damages

A report recently found that oil and gas giants are responsible for €25 trillion in climate damages. Now, survivors of Super Typhoon Odette in the Philippines are suing Shell for damages, in a legal first for holding big oil accountable for its role in climate destruction.

Robin Wells, Director of Fossil Free London said:

> *Whilst executives drink champagne in tuxedos, the world floods outside. They pat themselves on the back for the 'deal of the year', whilst their projects sign death warrants for communities in the Global South and future generations everywhere.*
>
> *How can it be that business as usual awards the fossil fuel corporations that depend on the systematic destruction of our life support systems? The science is clear: every new oil field is an act of violence. We crashed their party to remind them that history will not give them an award; it will put them on trial.*

Featured image via the Canary

■

DE Southern Daily Echo Follow 9.1K Followers

Arrest made as climate activists stage protest in Southampton

Story by Ross Marshall • 5mo • 1 min read



The protesters took to Threefiled Lane in Southampton (Image: NQ)

A woman has been arrested during a climate protest in Southampton today.

Campaign group, Cut The Ties To Fossil Fuels, have taken to Threefield Lane in Southampton to stage a demonstration today.

The group were seen holding signs and banners, reading 'cut ties to carbon pollution' and it is understood that police arrested one of the protesters at the scene.

Hampshire police have been approached for more information on the arrest.

A police spokesperson said: "We were called at 12:41pm today (Wednesday 10 December), to reports of a protest at a business on Threefield Lane in Southampton.

"Officers are in attendance.

"Policing these events requires us to balance the rights of those lawfully protesting, and the rights of others to go about their lives without being subject to unacceptable disruption, whilst keeping the public safe.

"Our priority with protests is always public safety."

Activists stage Extinction Rebellion protest against private jet expansion in London



Extinction Rebellion campaigners gather outside the Macquarie Group headquarters to protest the proposed expansion of Farnborough Airport. Two activists, dressed in airplane costumes, occupy the entrance canopy while unfurling a banner that calls for a ban on private jets and urges the investment firm to sever its connections to fossil fuels. The demonstration highlights the environmental impact of business aviation, as the Australian-based global financial services group faces criticism over its majority ownership of the airport and its plans to increase annual flight limits. (Photo by Joao Daniel Pereira/Sipa USA)

■

Cut ties to Big Oil to stop energy crisis sparked by Trump's war on Iran – protest footage

Outside the US Embassy in London on 1 April, two activists were tied by fuel hoses to a life-sized petrol pump in response to Donald Trump's war on Iran.

The protest criticised the increase in oil company profits in the wake of the war's destruction and trade disruption. The pump carried the label: "Oil Profit$$$ for Oil Bosses".

Campaigners from Fossil Free London held signs saying "Stop Trump Tying us Into Fossil Fuels", "Break Free from Climate Crisis" and "Break Free from Big Oil".

Thousands have died to date across the region following US and Israeli attacks on Iran. Trump has recently stated his intention to "take the oil in Iran" following major attacks on fossil fuel infrastructure.

Meanwhile, oil dependency is increasing the cost of living once again for families in the UK as petrol prices rise. Whilst fossil fuel companies stand to make a windfall of billions on the back of the price shock.

One of Reform's major donors, Jeremy Hoskings, has seen his fossil fuel and energy hedge fund investments rise by more than $25m since the war began in Iran.

This comes as Trump and Reform are using the oil price spike to call for our government to approve new UK oil and gas projects, like the controversial Rosebank oil field. Despite the fact that drilling in the North Sea would not make the UK more energy secure. If production began, Rosebank's oil would still go for export – like 80% of all UK oil.

Robin Wells, director of Fossil Free London said:

> *Right now we are seeing the horrors of Trump's war on Iran in the faces of dead schoolgirls and facing skyrocketing energy costs at home. And Big Oil cashes out big, with bumper profits.*

We're protesting today to say that for as long as the UK stays tied up in fossil fuels, we'll see more oil wars, more extreme weather deaths and more instability.

The UK needs to cut ties with Trump and Big Oil. We need to break free from this knot of violence.

That starts with scrapping new UK oil and gas and rejecting Rosebank. Until then, being tied into Big Oil's big disaster leaves us paying the price.

Featured image via Fossil Free London

■

FØSSIL FREE LONDON

PHOTOCALL: Body bags piled outside Equinor as Q1 profit spike expected from Iran war

When: 8.15am, Tuesday 5th May

Where: Equinor Offices, W2 6BD

Details: Activists from Fossil Free London will pile several life-sized body bags outside the offices of Rosebank co-owner Equinor, as one campaigner dressed as an oil executive stands on top of them.

The protest comes as the UK Government's decision on whether to approve or reject the Rosebank oil field approaches.

Equinor's quarterly profits are **also expected to jump** when announced on Wednesday 6th May, amidst the US-Iran war.

Photos can be used in coverage of Equinor's quarterly profit announcement.

(We will also stage a stunt ahead of Shell's Q1 profit results on Wednesday the 6th at 8:15 a.m. outside Shell's HQ, we will send a separate photocall tomorrow.)

For further information, to find us on the day, or to organise an interview please contact campaigner@fossilfreelondon.org, or 020 3886 2590.

Notes:

1. For further information, please contact Rosie, 020 3886 2590, **campaigner@fossilfreelondon.org**.

2. Fossil Free London is a grassroots climate group that protests Big Oil and campaigns for a London beyond fossil fuels. Instagram: **@fossilfreelondon** Twitter: **@fossilfreeldn**.

3. Photos from other Fossil Free London actions are available **here** and can be used in your journalism at any time without prior permission. Please credit Fossil Free London.

Protesters take aim at Aviva as shareholder meetings face disruption



The tie-up will create a significant force in the motor insurance sector (Alamy/PA)

Aviva's York offices were disrupted by protesters targeting the insurer's activities in the latest twist in a turbulent season for shareholder meetings.

It comes after NatWest's annual general meeting (AGM) was halted by activists accusing the bank of backtracking on climate commitments.

Campaign group Boycott Bloody Insurance claimed to be behind 12 people with shares in Aviva disrupting its AGM on Wednesday.

Several protesters shouting and chanting outside a boardroom were escorted or carried out of the building, delaying the start of the meeting.

The group claims Aviva underwrites or invests in companies profiting from immigration detention and surveillance, fossil fuel giants and weapons firms.

Andrew Taylor, a campaigner at Boycott Bloody Insurance said: "Aviva likes to present itself as an ethical business, but when you look at the companies it supports, that turns out to be a sham."

Aviva declined to comment on the protests.

Meanwhile, following a shareholder vote at the AGM, some 8.4% of votes were cast against the motion to approve Aviva's climate-related financial disclosures for 2025, while 5.5% of votes were against approving the pay policy for directors.

Aviva's chief executive Amanda Blanc took home a pay packet of £9.76 million last year.

The disruption comes a week after NatWest was forced to stop its AGM for about half-an-hour amid disruption during its chairman's opening speech.

Protesters were singing and making statements about NatWest's climate policies, while shareholder activists called on the banking group to address claims it had "reduced the ambition of its fossil fuel policy and climate targets".

Rick Haythornthwaite, NatWest's chairman, defended its policies and said the financing of oil and gas comprises 0.6% of the group's total lending.

Meanwhile, Barclays is expected to be targeted at its AGM in London on Thursday, with activist groups including the Palestine Solidarity Campaign and Campaign Against Arms Trade organising a protest outside the meeting.
■

Fossil Free London pours fake blood outside Shell offices as it ‘makes a killing’ from the Iran war



Fossil Free London campaigners protest outside Shell’s London headquarters against its giant profits from the Iran war [Pic: Fossil Free London]

FOSSIL Free London activists covered themselves in fake blood as they sat outside Shell’s London headquarters wrapped in a fuel pump today.

They erected a banner that read “BLOOD MONEY: No new oil & gas” amid expectations the fossil fuel giant will announce bumper quarterly profits today thanks to the Iran war.

Fossil Free London spokesperson Robin Wells said: “In these past few years, as our world becomes more unstable and the realities of climate breakdown set in, it’s never been clearer: Big Oil profits from, and locks in, mass death.

“And we’re feeling this so rawly right now. As we see thousands slaughtered in Iran and weep alongside those mothers who will never hold their children again, Shell is making a killing.”

More than 2,000 people have been killed by the US and Israel’s war in Iran, which has sent oil prices soaring due to a blockade on the Strait of Hormuz.

Barclays shareholder meeting targeted by Palestine and climate activists

Disruption broke out at the beginning of the shareholder meeting in Westminster on Thursday.



Protesters outside the Barclay's AGM in Westminster (Rebecca Speare-Cole/PA) (PA Wire)

Barclays faced a chaotic annual shareholder meeting as Palestine and climate activists repeatedly confronted the lender's board over its ties to Israel and fossil fuel financing.

The UK's biggest bank has come under fire in recent years for its links to Israeli government bonds and defence firms producing equipment used in attacks in the Gaza Strip, as well as companies driving large amounts of planet-heating emissions.

Disruption broke out at the beginning of the shareholder meeting in Westminster on Thursday, with groups of people being pulled out by security.

Chairman Nigel Higgins' opening remarks were repeatedly interrupted as protesters stood up holding Palestinian flags and shouting comments such as "Free, free Palestine" and "Everyone here is profiting from genocide".

Mr Higgins responded that the board had “heard your point” and would take questions on the topic during the meeting’s Q&A section.

A few minutes later, climate protesters rose from their seats and started singing: “Stop, in the name of love, before you break this Earth.”

One shouted: “This bank is financing the climate and nature crisis that we have to stop. Softly-softly, slowly-slowly is not good enough. You are endangering life on Earth.”

As the meeting moved to shareholder questions, the board was repeatedly quizzed about its recent fossil fuel financing.

Shareholders accused executives of failing to act with enough urgency over the climate crisis and criticised the board for leaving a key industry climate group, the Net Zero Banking Alliance.

A representative from ShareAction, which campaigns for responsible investment, called on the board to affirm that it will stick to its climate goals in light of its continued lending to oil and gas firms.

Mr Higgens said Barclays has “no intention of backtracking on its commitments” and remains on track to meet climate targets that it says are aligned with the UN Paris climate agreement to limit the worst impacts of global warming.

“I know this sometimes frustrates people who would like to see us move further, but we have got a big emphasis on consistency, not chopping, changing, going backwards, sideways,” he said.

On its oil and gas lending, Mr Higgins said the bank hit “quite demanding” targets for reducing financed emissions in the energy field and power sector early, although he also acknowledged that progress is “not going to be linear”.

In light of growing global energy demand and price shocks driven by the US-Israeli conflict with Iran, he said: “We feel we have to balance the planet with energy security, energy affordability and also ramping up our transition and sustainable financing activities.”

The board was also challenged about Barclays’ ties to the Israeli government after a UN report last year identified the bank as one of several firms implicated in profiting from a “genocidal economy” in Gaza.

Mr Higgins said the bank does not understand the “report”.

“We’ve read it and we don’t agree with the characterisation of the financial sector in it,” he said.

On its dealings with foreign governments, the chairman said the bank “tries to follow the policies set out by the British Government”, which continues to support Israel’s right to defend itself.

“These are deeply political and complicated questions and at one level, certainly, we take a steer from where our country’s Government is,” he said.

He added: “We do provide finance to a number of international defence companies who provide arms for the defence of this country, for the defence of Ukraine, and that is what the bank does.”

Asked if the bank will commit to supporting the sovereignty of the Palestinian people in any future dealings with Israel and its associated companies, Mr Higgins said: “The thing we all wish and pray for is peace in the region and reconciliation and an end to the appalling human cost on all sides of whichever frontiers you’re looking at.

“And all of the discussions around our policy, we shouldn’t lose sight of that fact – that is by far and away the most important thing to wish for.

“But I’m afraid I’m not going to go into our financing policies on specific clients.”

One shareholder shouted: “That’s not going to happen, Mr Chairman, unless commercial companies and banks stop financing Israel.”

City firms continue to face protests over their impact on people and planet, with NatWest’s AGM halted last week by activists accusing the bank of backtracking on climate commitments.

Wednesday also saw the London offices of insurance giant Aviva targeted by activists claiming the company underwrites or invests in companies profiting from immigration detention and surveillance, fossil fuel giants and weapons firms.

■

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

AJW11

This is the exhibit marked "AJW11" in the witness statement of Alexander James Wright.

About us

Just Stop Oil was a nonviolent civil resistance group in the UK. In 2022 we started taking action to demand the UK Government stop licensing all new oil, gas and coal projects. We have won on this. **Civil resistance works.**

Just Stop Oil ended its street campaign in 2025, whilst we continue to support our action takers through the courts and in prison.



Two Just Stop Oil supporters found guilty for Heathrow paint spraying following retrial

Court & Prison, Press / May 14, 2026

Two Just Stop Oil Supporters who sprayed Heathrow departure boards with orange paint during the Oil Kills, international uprising to end fossil fuels in July 2024 have been found guilty in a retrial after the jury in an earlier trial failed to reach a majority decision. [1]

Phoebe Plummer and Jane Touil were appearing before Her Honour Judge Duncan at Isleworth Crown Court for the second time accused of criminal damage over £5,000 for their action on 30 July 2024 to demand a fossil fuel treaty to end oil and gas by 2030. [2] [3]

Following the verdict Jane Touil said:

"Since I took action, global fossil fuel use and emissions have continued to rise. More than ever, we need a global fossil fuel treaty to help governments rapidly phase out fossil fuels."

"What we do at this moment in history matters. But there is a difference between laws and morality. The courts apply the law made by powerful people. Morals come from within. It is our morals that give us our conscience. I have always tried to live according to my conscience."

Phoebe Plummer said:

"The climate crisis is the greatest injustice that humanity has ever faced. We should all consider what to do at this time. No individual caused this crisis and no one is solely responsible for stopping it. But we can choose what we do to alleviate suffering. I feel compelled to act to be a responsible citizen, a loving aunt and a good person. It compels me to hope for a better future and one where my nephew grows up. I didn't think the action would change government policy. But non violent civil resistance is a necessary part of tackling the climate crisis and I'm grateful and proud to have been part of that. "

Phoebe was remanded for 58 days and Jane for 14 days following the 2024 action in which the pair used fire extinguishers to spray diluted water-based paint in Terminal 5 including at the departure boards. The Crown alleged that the action caused £8,000 worth of damages and that three of the display screens needed to be replaced. [4]

At trial, Judge Duncan ruled out several legal defences for the action including those of 'reasonable excuse' under Articles 10 and 11 of the ECHR, 'necessity' and 'self defence' on the grounds that the threat from climate change was not proximate enough and the actions too far removed from the threat. The defendants were allowed to argue belief in consent : that they honestly believed the owners of Terminal 5 would have consented to the damage if they knew of its circumstances. However, evidence of the relevant circumstances was to be limited to the fact that it was a climate protest with all evidence about the scale and urgency of the climate crisis ruled *'irrelevant and therefore inadmissible'*.

In giving evidence, Jane Touil said:

"I genuinely and sincerely believed that if the shareholders [of Heathrow] had a full understanding of the situation we are in they would have given their consent to our action.

"Most people believe there is something that is wrong with climate but not many people have access to the full situation because the fossil fuel industry has used their immense wealth to ensure that governments do not act and it is not reported in the mainstream media.

"So I don't know if shareholders have a full understanding, but I know that if they did, they would be doing all in their power to stop fossil fuels because there will be no business as usual, no functioning society,

In her evidence Phoebe Plummer said:

"I want to make it very clear that this was not a protest against Heathrow, or anyone flying through Heathrow that day. It's true that the aviation industry is especially harmful to the climate in terms of emissions, though it is a small number of frequent fliers and private jet users who cause the vast majority of this harm, not families who save up for a holiday once a year.

"But this wasn't about getting people to stop flying…I made this individual change to live in line with my values, but honestly I know that it's pretty inconsequential. Even if we all woke up tomorrow and stopped flying and went vegan, it would be like mopping up a spill from an overflowing bath whilst leaving the tap on. All individual changes are like this when we are facing a systemic issue. If fossil fuels are extracted from the ground, then they will all be burnt, even if it's not on a flight that you're on. We need systemic change, that has always been Just Stop Oil's demand."

"My intention was not to cause damage. My intention was to take part in an act of nonviolent civil resistance, raising a serious alarm bell to the catastrophic future in store for us if we persist in our addiction to fossil fuels."

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.

ENDS

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

AJW12

This is the exhibit marked "AJW12" in the witness statement of Alexander James Wright.


JUST STOP OIL
Donate
News & Press
Law
!! NEW PROJECT ALERT !!
The rich are killing us. To stop them and fix our broken country we need to...
Take back POWER
Join us at: takebackpower.net

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

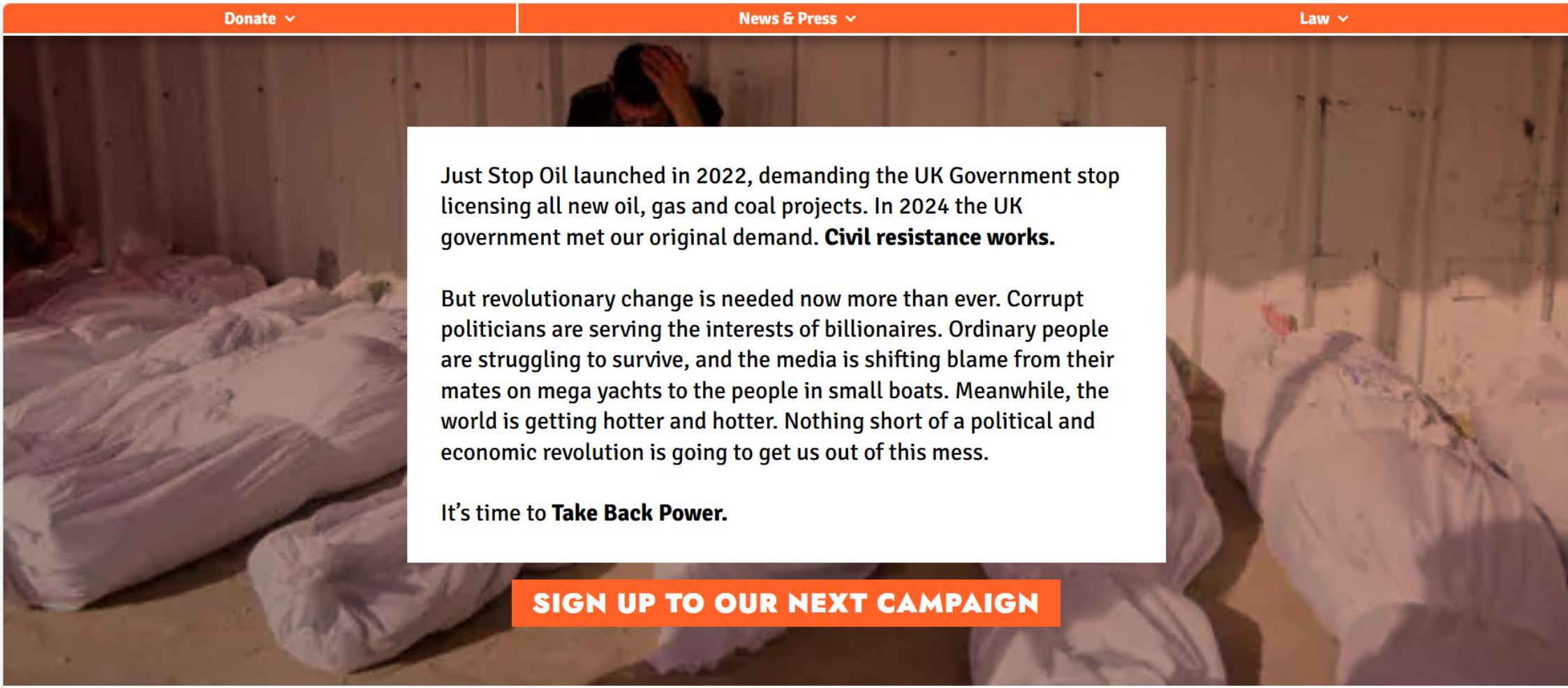
- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW13

This is the exhibit marked "AJW13" in the witness statement of Alexander James Wright.


Donate
News & Press
Law
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.**
SIGN UP TO OUR NEXT CAMPAIGN

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

AJW14

This is the exhibit marked "AJW14" in the witness statement of Alexander James Wright.

just.stopoil and defendourjuries



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just.stopoil 🚨 SLOW MARCHERS FOUND NOT GUILTY BY A JURY... more

17 April

17 April

just.stopoil



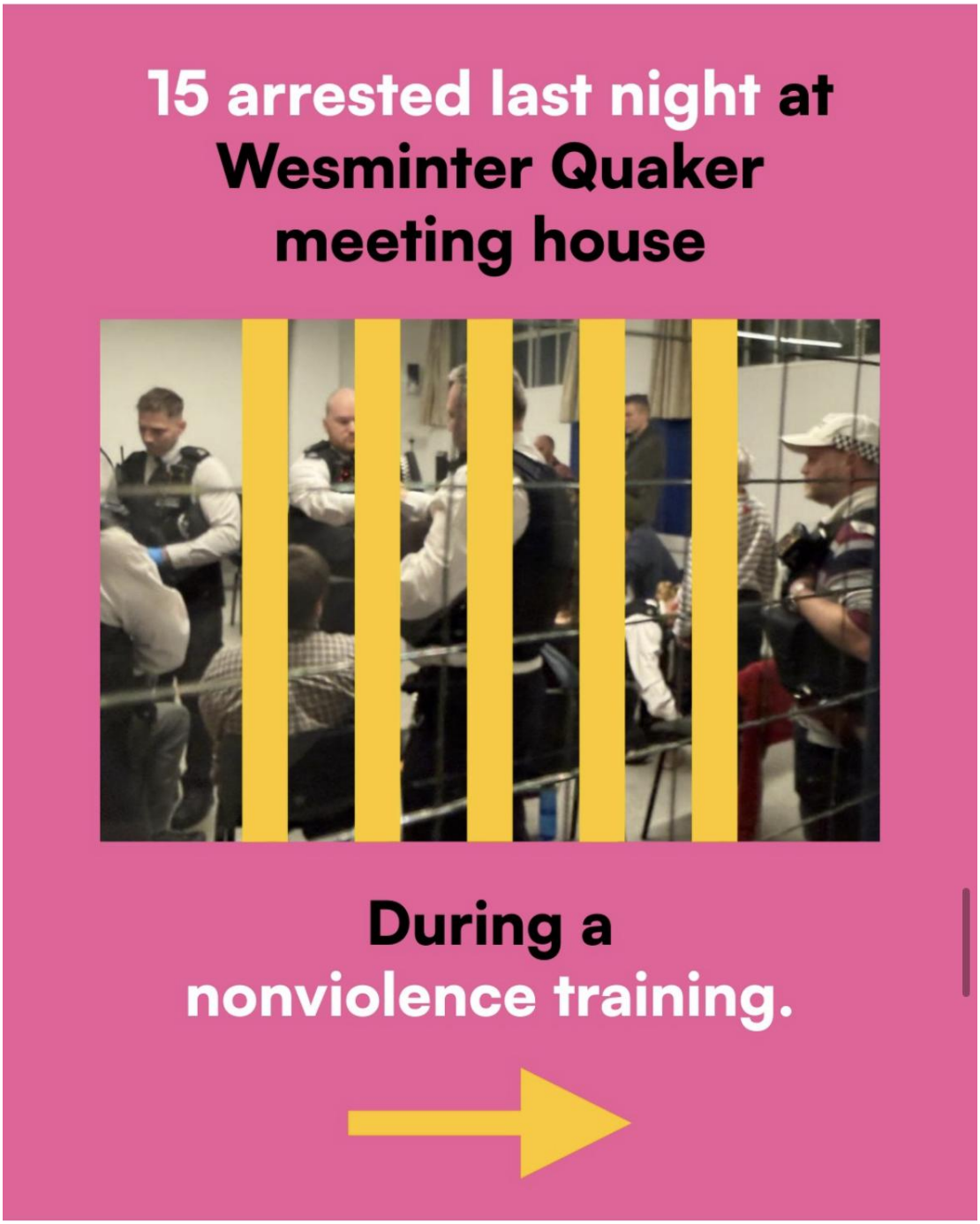
341 19 6 8

just.stopoil 🚨 BREAKING: JANE IS FREE!

Jane Touil, 60, has just been released from prison... more

7 April

takeback.power and 4 others



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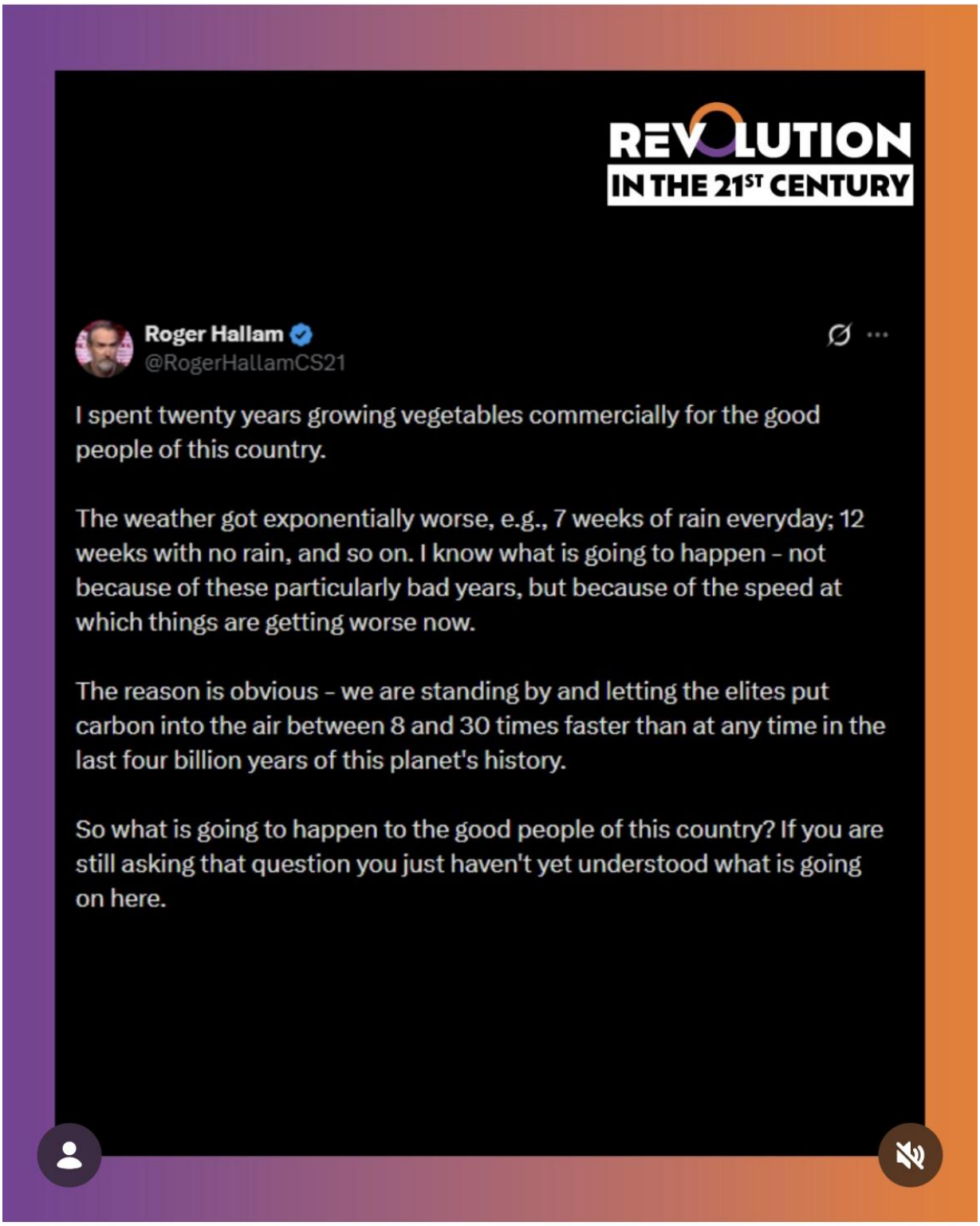
takeback.power Imagine being so deep in the pockets of CEOs and billionaires that you'd go to a Quaker Meeting House and arrest everyone at a nonviolence training.

@metpolice_uk really demonstrating the state's fear of peaceful resistance.

6 March

rogerhallamcs21 and 3 others
Wales, UK



298 18 28 31

rogerhallamcs21 With these numbers it's clear that revolution is inevitable. Sign up for it at rev21.earth.

3 March



69 3 2 3

takeback.power Another Just Stop Oil jury trial has just been adjourned to 2027.

Fact 1. All Section 7 jury trials bar one for nonviolent civil resistance have been adjourned in the 2 years since the Public Order Act came into law.

Fact 2. Lammy is planning to try and rush through scrapping jury trials.

There is no justice in our "Justice" Secretary.

23 February

Just Stop Oil
11.9K posts

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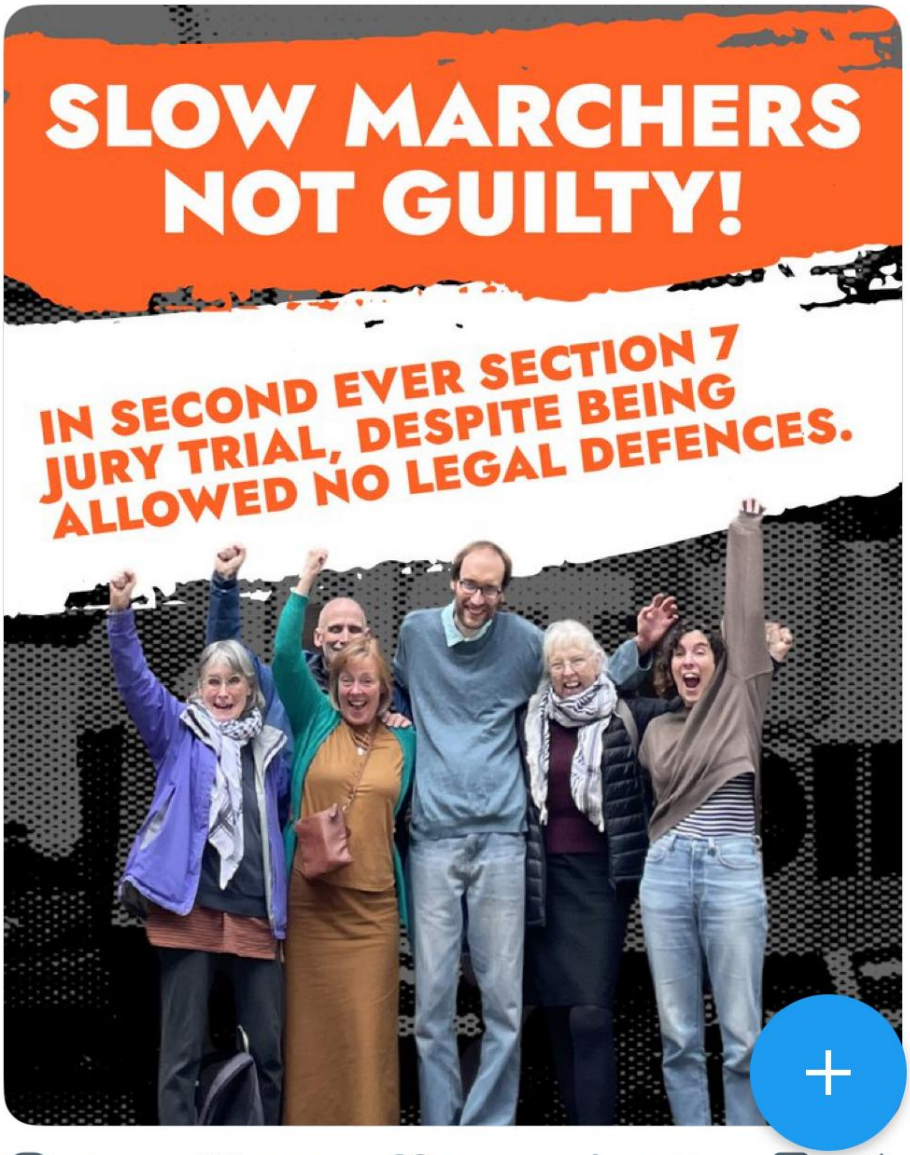
Posts Replies Highlights Videos Photos

Just Stop Oil @JustSt... · 17/04/2026

🚨 SLOW MARCHERS FOUND NOT GUILTY BY A JURY

Hey @SuellaBraverman, turns out juries don't like when you invent anti-protest laws designed to imprison people for 12 months just for marching.

Six Just Stop Oil supporters were a Show more



42 568 1K 35K

Just Stop Oil
11.9K posts

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Posts Replies Highlights Videos Photos

Just Stop Oil @JustSt... · 07/04/2026

🚨 BREAKING: JANE IS FREE!

Jane Touil, 60, has just been released from prison after serving 4 months of a 20 month sentence for climbing a gantry over the M25 in 2022 to demand an end to new oil and gas. She is partially sighted.

She will serve the rest of her sente Show more

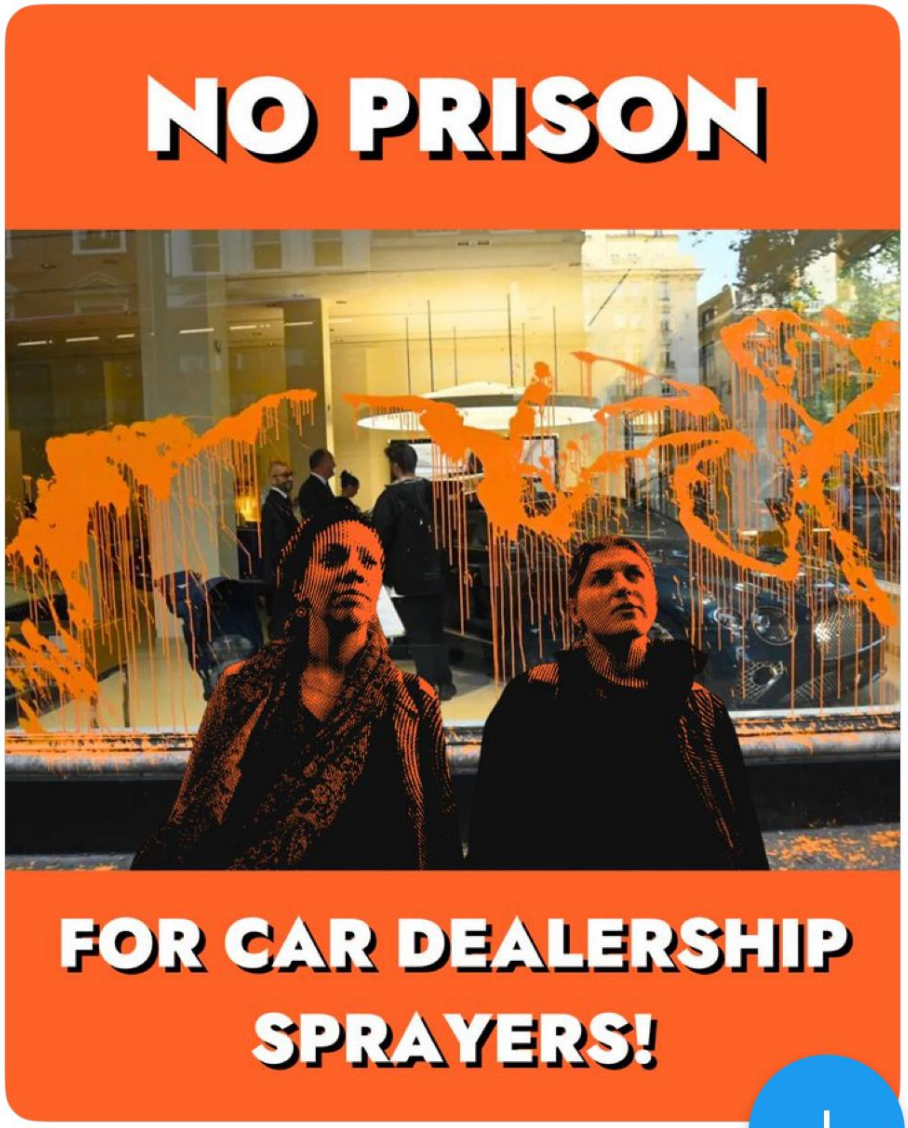


21 105 294 5.5K

Just Stop Oil @JustSt... · 20/02/2026

🚨 BREAKING: NO PRISON FOR CAR DEALERSHIP SPRAYERS

In October 2022, Carmen and Emma sprayed orange paint over high end car dealerships including HR Owen, Jack Barclay and Ferrari Mayfair, demanding an end to new oil and gas licences Show more



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Just Stop Oil
17 Apr ·

🚨 SLOW MARCHERS FOUND NOT GUILTY BY A JURY... See more



Southwark Crown Court today, two and a half years after slow marching on Waterloo Bridge to demand an end to new oil and gas licensing.

On 8th November 2023, Sheila Shatford, Julia Mercer, David Kilroy, Geraldine James, Rosalind Bird and Gregory Sculthorpe were among approximately 50 supporters who joined a slow march around the IMAX roundabout before heading north over Waterloo Bridge. They were arrested and charged with Section 7 of the Public Order Act 2023: interference with key national infrastructure: an offence which was used for the first time only two days beforehand, and which carries a maximum penalty of 12 months imprisonment, an unlimited fine, or both.

The six appeared before Judge Hiddleston at Southwark Crown Court this week in a trial which had been restarted after one of the original jury fell ill. The jury delivered their

During the five day trial, the Judge denied the defendants all legal defences including reasonable excuse and necessity, and ruled that agreed facts on climate were "irrelevent". The defendants were, however, given around 20 minutes each to talk about their motivations for taking action.

The jury were asked to consider whether the defendents had caused a significant delay to other road users, and if so whether that was their intention or they were reckless as to whether that would have been the result.

The police produced a compilation of video evidence showing the march which demonstrated some traffic buildup, but no evidence of a normal traffic flow at that location. Laura Stockdale, acting for Greg Sculthorpe, questioned whether the jury could be sure that this buildup was more than would normally occur on a weekday in central London.

been less if the police had let the march continue to the other end of the Bridge and if they had not themselves closed the Southbound carriageway. DI Keven Pender for the Metropolitan Police responded that they could not be sure what the marchers were planning to do.

The defendants each emphasised their desire to draw attention to the climate crisis and the care and careful planning that was involved in undertaking a march. All denied that there was any intention to cause anything more than minor slowing of traffic.

In her defence evidence, Sheila Shatford spoke movingly of what inspired her to take action, including a childhood teacher whose family had been affected by the Aberfan disaster in which 116 children were killed. She said: "Only later did I understand that the slag heap belonged to the National Coal Board, and that warnings were given before the disaster, but

She went on to recount how she had learned about the climate emergency and said: "I realised that it's always the poorest and most vulnerable that are most affected and have the smallest voice. I read and found out the climate emergency was real - there is overwhelming evidence that it's happening now, and very soon we won't be able to stop it."

The 2023 Public Order Act was introduced specifically to target climate protest, and named groups such as Extinction Rebellion, Just Stop Oil and Insulate Britain as the reason for its introduction. Although hundreds of Just Stop Oil supporters have been charged with the Section 7 offence and are awaiting trial, as a result of the backlog in courts, this was only the second case to be heard since May 2024.

The first person to be convicted of the offence was Stephen Gingell who was jailed for 6 months after pleading guilty in December 2023.

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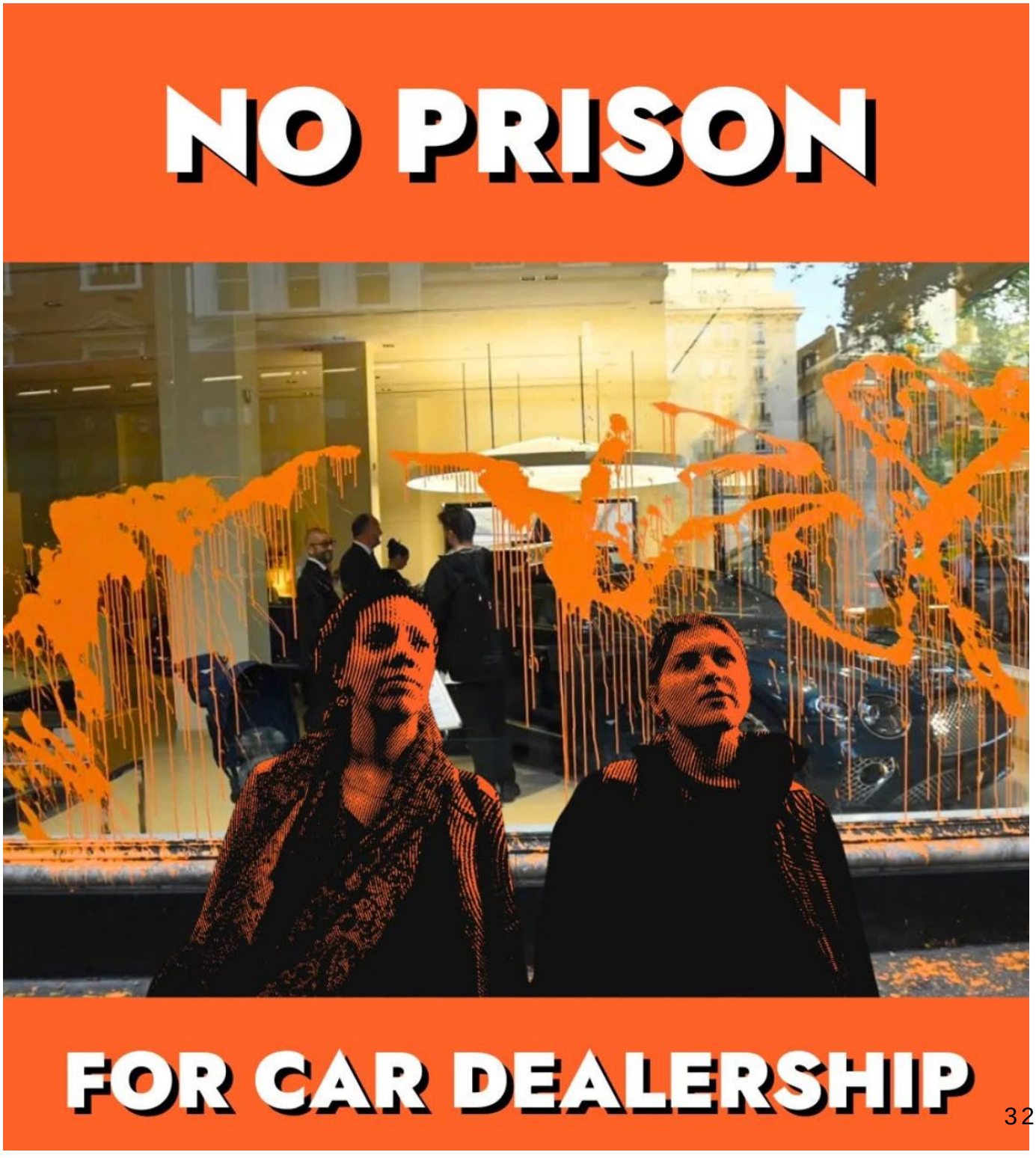

CLAIM NO: KB-2024-1765

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

AJW15

This is the exhibit marked "AJW15" in the witness statement of Alexander James Wright.

Taking back power or taking the mickey? The activists ‘liberating’ food from big stores

A new UK civil resistance group has called for ‘mass shoplifting’ to focus attention on inequality, but recent stunts have led to arrests



Eve Middleton was sitting on a picnic blanket in a park, sharing out vegan biscuits with six fellow activists, when she saw a squad of police bearing down on them. About 30 officers, she said, surrounded the seven young people, and one officer told them: “Don’t run or you’ll be cuffed.”

Another officer focused on gathering evidence. “Whose Oreos are these?” they asked, seizing the biscuits.

“It was pretty farcical, but it’s still frightening when you see that amount of officers running towards you. It’s pretty scary,” said student Bridie Leggatt, another of the seven.

The seven activists had gathered for a “nonviolence training event” – meeting in the park to enjoy the sunny weather.

Leggatt, 22, and Middleton, 25, were among 13 people arrested last weekend in Salford and London as part of a national police crackdown on a new civil resistance group called Take Back Power.

A further 15 arrests had been made in March when police raided a “nonviolence training” event, this time at the Grade II-listed Quaker House in Westminster.

They were all held on suspicion of conspiracy to commit theft, police said, linked to Take Back Power’s campaign of “mass shoplifting” in supermarkets across Britain in a protest against inequality.

On TikTok, the group’s videos show activists of all ages “liberating” rice, pasta, beans, nappies, stock cubes and tinned fruit from supermarkets including Cornwall, London and Manchester.

They pile the goods into cardboard boxes branded with the message: “These things are going to those who need them.” The items are then distributed at local food banks – if they manage to get past security.

Even by today's standards of shoplifting, when supermarket thefts have reached record highs, the mass looting is quite brazen.

Steph Parker, an assistant chief constable at Greater Manchester police, said forces would take "robust action to disrupt this type of organised criminality and it will not be tolerated".

Middleton and her six comrades were held in custody for 24 hours before being released on Monday. For Middleton, like many of the activists, this is not her first encounter with the law.

Many of those involved with the group 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. Neither Middleton or Leggatt wanted to say how many times they had been arrested as they feared a telling off from their parents.

Take Back Power announced itself in December when activists threw custard and apple crumble at a case containing the crown jewels at the Tower of London.



Eight people were charged with criminal damage over the stunts, with four due to appear before Westminster magistrates court on Monday. The group said a total of 50 people had been arrested since December, with the majority detained while taking part in "nonviolence training" events.

On its website, activists are invited to join upcoming action in London "targeting the luxury lifestyle of the super-rich" by "occupying where they play and shop".

A spokesperson for Take Back Power, who would only give his name as James due to the risk of arrest, said the group planned further headline-grabbing stunts this year with the aim of focusing attention on Britain's deepening inequality.

James said the organisation, which wants to see higher taxes levied on the rich and a legally binding citizens' assembly, had no leader "as such". It has raised more than £65,000

in donations in the past four months, according to a fundraising page.

Another of those arrested last weekend, who would only give his name as Mark, said mass shoplifting would have "no real effect" on supermarkets who make billions of pounds in profit.

"Supermarkets are profiting off other people's misery and we can't put up with that," said Middleton, pointing out that Tesco's chief executive, Ken Murphy, was paid £9.2m last year, about 400 times that of the shop's typical worker.

What about the effect on low-paid staff? Will they not risk losing their jobs if mass shoplifting has an effect on company profits?

"It shouldn't be staff that get cut," said Mark, 44, who works in education. "What should get cut are the obscene profits and salaries of the chief executives."

The vegan picnic raided by police last weekend was in Salford's Peel Park – named after Sir Robert Peel, the founder of modern law enforcement whose philosophy of "policing by consent" is a guiding principle of forces today, recognising that those in uniform operate on the basis of public trust rather than fear or force.



Yet the arrests of activists at a training event – rather than for a specific act – appears to run counter to that principle, said Middleton.

Parliament's joint committee on human rights has condemned legislative changes in recent years that it said (pdf) have had "a chilling effect" on the right to protest in England and Wales.

Middleton said the arrests on suspicion of being involved in a conspiracy was part of a wider "repression" of civil resistance in Britain.

"Other groups were able to take part in training without everyone getting arrested," she said. "For doing not as much, the risk of prison is a lot higher."

James, the Take Back Power spokesperson, said the group planned to build up its action with the aim of pushing inequality to the top of the agenda by the next general election, which has to be held by August 2029.

Middleton believes the police crackdown is a sign that the authorities are scared.

“They can see that Take Back Power does speak to a lot of this country’s people [who are] fed up with inequality. They are scared of what it could become.”
■

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

AJW16

This is the exhibit marked "AJW16" in the witness statement of Alexander James Wright.

Four taken into custard-y as Take Back Power ‘crumble and custard’ the Crown Jewels



Two supporters of Take Back Power have smothered dessert over the crown jewels. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen’s assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 09:50 this morning, two Take Back Power supporters covered the glass containing the crown jewels in custard and apple crumble. They then held a sign which read ‘DEMOCRACY HAS CRUMBLED- TAX THE RICH’. By around 10:30, the two action takers and two others had been taken into custard-y by police.

Today’s action comes as all donations to Take Back Power will be doubled until midnight on Sunday the 7th December! You can donate and have your donation doubled here. [2]

A Take Back Power spokesperson said:

"Since 2011, the poorest 10% of households have paid a combined tax rate of 44% on their income and wealth gains, while the richest paid 22%. Our political class, be it this government, Reform or Tory, serve the super-rich; they do not care about working people. That's why we must demand real democracy, with ordinary people at the heart of decision making, through a citizen-led assembly that has the power to tax the rich." [3]

One of those taking action today is Miriam Cranch, 21, a retail worker from Leeds, who said:

"Britain is broken because the super rich are pocketing billions, whilst working people struggle to get by."

"This wealth inequality is leading us towards civil unrest, and it doesn't have to be this way. Billionaires should not pay a lower tax rate on wealth they generate doing nothing, than those of us working jobs. It's time ordinary people get a say on how to tax wealth with a permanent House of the People."

Also taking action today is Zahra Ali, 19, a student from London, who said:

"Our country is crumbling before our eyes! We have homeless people dying on the very streets that King Charles passed on his way to the coronation, whilst there are more empty homes than unhoused people in this country."

"It's time the ultra rich pay their fair share. We demand a permanent House of the People. It's time to take back power, tax the rich and fix Britain! Join us at takebackpower.net."

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net.

ENDS

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

AJW17

This is the exhibit marked "AJW17" in the witness statement of Alexander James Wright.

~~Wed, Jul 22, 2026, 6:00 pm~~ 8:00 pm	~~Welcome Event~~	~~London, E1~~ 5QJ	~~Register~~

Follow us on social media.

—

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, 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!**

—

Contact us
General: info@takebackpower.net
Press: press@takebackpower.net
Fundraising: giving@takebackpower.net

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First name *

Email *

Postcode

Country

-

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Register

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

AJW18

This is the exhibit marked "AJW18" in the witness statement of Alexander James Wright.

What is Take Back Power and what does it want?



– 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.

+ What is Take Back Power's demand?

+ What is the House of the People?

+ What would the House of the People do?

+ Has an institution like this existed before?

+ Don't the super-rich already pay too much tax?

+ How rich are we talking about here?

+ How bad is inequality in the UK?

+ What sort of tax would you like to see?

+ Even if you tax the rich it won't be enough to fix Britain will it?

+ How would you spend the money raised?

+ Why does Take Back Power engage in disruptive direct action?

+ How is Take Back Power funded?

+ How can I get involved?

What is Take Back Power and what does it want?



+ What is Take Back Power?
+ What is Take Back Power's demand?
+ What is the House of the People?
+ What would the House of the People do?
+ Has an institution like this existed before?
+ Don't the super-rich already pay too much tax?
+ How rich are we talking about here?
+ How bad is inequality in the UK?
+ What sort of tax would you like to see?
+ Even if you tax the rich it won't be enough to fix Britain will it?
+ How would you spend the money raised?
– 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. You can read more about how this works here.

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

AJW19

This is the exhibit marked "AJW19" in the witness statement of Alexander James Wright.

(https://takebackpower.net)

‘Inequality is shit’ — Take Back Power deliver crappy Christmas for the Ritz

December 3, 2025(https://takebackpower.net/2025/12/03/)



Three supporters of Take Back Power have delivered a pile of shit to the Ritz. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen’s assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 12:05 today, three Take Back Power supporters deposited a pile of manure below the Christmas tree at the iconic luxury hotel. The three were quickly removed from the lobby and then held signs outside the entrance which read: ‘INEQUALITY IS SHIT’ & ‘TAX THE RICH’.

A Take Back Power spokesperson said:

"The super-rich have more than doubled their wealth since the pandemic, while this Christmas, a third of UK children suffer and grow up in poverty. It's time ordinary people – those most affected by inequality, get a say in deciding how to tax wealth through the means of a legally binding citizen's assembly- a House of the People." [2][3]

One of those taking action today, Ellen Redwood-Brown, 23, an NHS worker, said:

"The billionaires, corporations, and corrupt politicians running Britain don't care about us. While working in the NHS I've seen people dying because they couldn't get appointments whilst doctors are working 15 hour shifts."

"The UK has 156 billionaires. We could take away 75% of that wealth to fix Britain and we'd still have 156 billionaires. We must let ordinary people decide how to tax the rich." [4]





Also taking action today is Tom Barber, 65, a former doctor, journalist and community worker from Nottingham, who said:

"Power is concentrated in the hands of a small group of obscenely wealthy and ruthless individuals. They are hell-bent on enriching themselves, forcing the gap between the haves and the have-nots ever wider."

"Everyday people must Take Back Power, compelling our government to create a permanent citizens' assembly- a House of the People. Only then can we start making decisions for everyone's benefit- taxing the rich, creating a fairer society and restoring our faith in our democracy."

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

(https://takebackpower.net)

Four taken into custard-y as Take Back Power ‘crumble and custard’ the Crown Jewels

December 6, 2025(https://takebackpower.net/2025/12/06/)



Two supporters of Take Back Power have smothered dessert over the crown jewels. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen’s assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 09:50 this morning, two Take Back Power supporters covered the glass containing the crown jewels in custard and apple crumble. They then held a sign which read ‘DEMOCRACY HAS CRUMBLED- TAX THE RICH’. By around 10:30, the two action takers and two others had been taken into custard-y by police.

Today's action comes as all donations to Take Back Power will be doubled until midnight on Sunday the 7th December! You can donate and have your donation doubled here (https://chuffed.org/project/take-back-power?utm_source=tbpnet&utm_medium=websitet&utm_content=tbphome&utm_term=doubletop) (https://takebackpower.net) [2]

A Take Back Power spokesperson said:

"Since 2011, the poorest 10% of households have paid a combined tax rate of 44% on their income and wealth gains, while the richest paid 22%. Our political class, be it this government, Reform or Tory, serve the super-rich; they do not care about working people. That's why we must demand real democracy, with ordinary people at the heart of decision making, through a citizen-led assembly that has the power to tax the rich." [3]

One of those taking action today is Miriam Cranch, 21, a retail worker from Leeds, who said:

"Britain is broken because the super rich are pocketing billions, whilst working people struggle to get by."

"This wealth inequality is leading us towards civil unrest, and it doesn't have to be this way. Billionaires should not pay a lower tax rate on wealth they generate doing nothing, than those of us working jobs. It's time ordinary people get a say on how to tax wealth with a permanent House of the People."

Also taking action today is Zahra Ali, 19, a student from London, who said:

"Our country is crumbling before our eyes! We have homeless people dying on the very streets that King Charles passed on his way to the coronation, whilst there are more empty homes than unhoused people in this country."

"It's time the ultra rich pay their fair share. We demand a permanent House of the People. It's time to take back power, tax the rich and fix Britain! Join us at takebackpower.net (https://takebackpower.net)."

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ENDS

(https://takebackpower.net)

Take Back Power supporters call on Starmer to cut the corruption and resign by ‘locking-on’ at Parliament

February 6, 2026(https://takebackpower.net/2026/02/06/)



Two young people have called on Keir Starmer to cut out corruption and resign by ‘locking-on’ outside Parliament. They are supporters of Take Back Power, a nonviolent civil-resistance group, demanding that the UK government establish a ‘House of the People’- a permanent citizen-led assembly with the power to tax extreme wealth. [1]

At 9am this morning, two young people carrying a giant Keir Starmer papier mache head locked themselves in front of Carriage Gate, blocking access to Parliament. They could be seen holding placards which read “Cut the Corruption”. By around 10am police arrived at the scene and had cut through the papier mache head.

A spokesperson for Take Back Power said:

"We're calling on Keir Starmer to resign. While Lord Mandelson is gone, the system that protected and empowered him remains. It's time to cut out the corruption at the heart of our democracy. While corporations and the super rich are splashing their cash to buy access to ministers and seats in the House of Lords, ordinary people are struggling to afford basic necessities."

"We need a radical overhaul so that democracy works for all of us, not just the privileged few. We have politicians in the pockets of billionaire pedophiles, they don't work for us. We need ordinary people in charge through a House of the People."

One of those taking action today is Alice Jones, 20, a student from Manchester, who said:

"It is absurd that we live in a country where 156 billionaires hoard wealth, splashing out on private jets, whilst ordinary people have to choose between heating their homes, or feeding their children; all while our country quickly descends into fascism."

"The politicians in our country are failing us. Ordinary people are being left to survive with the scraps: a crumbling NHS, extortionate food prices, and ever rising bills. The UK needs a permanent House of the People. It's time to take back power, tax the rich and fix Britain! Join us at takebackpower.net (https://takebackpower.net)."





(Left image credit to Jamie Lowe. Right image and main image credit to Will Colebourne.)

Also taking action is Bridie Leggatt, 22, who is also a student from Manchester, who said:

"Spiralling wealth inequality is leading us to societal collapse. Our country is the sixth richest nation and yet it is home to 4 million children living in poverty. Our political system doesn't function fairly. We need ordinary people in the decision making seats deciding how to fix this; not corrupt politicians in the pockets of the super rich."

“There IS a solution to inequality, but our government simply won’t do what’s necessary. We cannot let political parties use scapegoated minorities to distract us from what is needed: a tax on the super rich.”

(https://takebackpower.net/)





(Image credit to Will Colebourne.)

Today’s action comes just days after the MET police began criminal investigations into Peter Mandelson, Starmer’s former ambassador to the US, over allegations that he passed market-sensitive information to the pedophile financier Jeffrey Epstein.

New allegations from recently released Epstein files also allege that Peter Mandelson’s husband accepted money from Jeffrey Epstein after his prison sentence over child sexual offences. [2]

But the corruption doesn’t end there, recent research by the Guardian showed that almost a third (266 out of 800) members of the House of Lords have given donations to political parties, some 115 of them before they were given peerages. [3]

Recent media reports have revealed that Labour government ministers have met with the arms industry, banks and big oil hundreds of times, while half the cabinet have taken cash from pro-Israel lobbyists. The Party even offered sponsorship deals for £55,000 to allow businesses to host lunches for ministers at the Labour conference. [4][5][6]

Meanwhile, inequality is spiralling out of control. Student nurses say they are sleeping in their cars, going to food banks and relying on lecturers to buy them food, while nearly half of Brits would struggle to pay for basic necessities if they lost their jobs. Given this, it is not surprising that faith in political institutions has collapsed, with 87 per cent of Britons across all parties having either not very much trust in politicians or none at all. [7][8][9]

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen’s assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takepackpower.net).

ENDS

(https://takebackpower.net)

Police arrest 15 Take Back Power supporters at a nonviolence training event

March 5, 2026(https://takebackpower.net/2026/03/05/)



15 Take Back Power supporters were arrested during a nonviolence training this evening being held in the Westminster Quaker Meeting House. Take Back Power is a nonviolent campaign demanding a tax on extreme wealth, to be decided by a 'House of the People.' [1]

At around 18:35 a number of police officers forced entry into the Westminster Quakers meeting house. They proceeded to arrest 15 people on suspicion of conspiracy to commit theft. Two of those arrested were acting as legal observers. During the raid an ambulance had to be called as one person

suffered a panic attack after being arrested. Those arrested were sent to Brixton and Walworth police stations where one person was subsequently bailed. 14 remain in custody. [2]

(https://takebackpower.net)

A Take Back Power spokesperson said:

“The police arrested fifteen ordinary people in a place of worship for discussing nonviolent civil disobedience. This draconian overreach shows what the state is willing to do to protect corporate profits and billionaires, while ordinary people struggle to put food on the table.

The state is scared of civil disobedience because it works. But when the super-rich have captured our politics, nonviolent civil disobedience is the only choice we have to take back our power. Now more than ever, we need everyone to join us: sign up at takebackpower.net.”

In their statement, the MET police referenced last year’s unprecedented raid on Westminster Quakers and the arrests of Youth Demand supporters meeting about the genocide in Gaza, which drew widespread condemnation from faith groups. One of the people arrested this evening had also been previously arrested during last year’s raid on Westminster Quakers. [3]

ENDS

(https://takebackpower.net)

Take Back Power supporters redistribute food from supermarkets to those most in need

March 14, 2026(https://takebackpower.net/2026/03/14/)



Take Back Power supporters have been redistributing food from supermarkets to local foodbanks across the country this morning. Take Back Power is a nonviolent civil-resistance group, demanding that the UK government establish a ‘House of the People’- a permanent citizen-led assembly with the power to tax extreme wealth. [1]

From around 8:30 this morning, teams across four UK cities- Manchester, London, Exeter and Truro, entered supermarkets and began putting food and necessities into boxes emblazoned with ‘These things are going to those that need them’. The Take Back Power supporters left the shops without paying for the produce and then redistributed these items to local food-bank drop off points.

In Exeter, a team of five supporters took five boxes of produce from Morrison’s supermarket in Prince Charles Road, however were stopped by security who took away two of five boxes. The remaining three boxes were successfully

liberated and taken to a local food-bank drop off point.

From 9am, in London, on liberating boxes of food, two supporters set up a stall outside Sainsburys in the Lewisham centre, to give the food back to the local community. Security staff arrived by around 9:40 and police arrived onsite at around 9:50. No arrests have been made as of yet and the supporters left at around 10am.

In Manchester, three action takers filled boxes with food from Tesco, on Pars Wood Lane in Didsbury. All three left the store without incident and redistributed the food to a food-bank drop off point at a local Aldi.

In Truro, two supporters loaded boxes from the Sainsburys on Treyew Rd and left the produce at the foodbank drop-off point in the same store.

A spokesperson for Take Back Power said:

"It is sickening that 6.5 million people in the UK are forced to turn to food banks every year and a third of children under five are living in homes where there is insufficient access to nutritious food. This is because our country is in crisis, with billionaires hoarding wealth, whilst ordinary people suffer. We need to tax extreme wealth to fix Britain, and we need ordinary people to decide how."







(Credit for image on the left and far right to The Canary)

One of those taking action today is Eve Middleton 25, from Manchester, who said:

"I refuse to sit by while billionaires hoard wealth and capture our democracy. We can all see the impacts of inequality on our streets, in our schools and hospitals and in our own homes. Taxing the super rich is the first simple step to solving these crises. Yet our political system will not deliver a wealth tax, as it is rigged to

benefit parasitic billionaires instead of the masses. It's time for ordinary people to be put at the heart of decision making, through a House of the People with powers to tax the rich and fix Britain."
(https://takebackpower.net)



(Credit for image to The Canary)

Also taking action is Ruth Cook, 74, a company director from Somerset, who said:

"I'm taking this action and risking arrest because we have a terrible situation in this country. Families are struggling and children are going hungry, while the profits some companies make are obscene. The answer is to tax the super-rich. I'm taking this food and delivering it to a food bank collection point because we need to do something about this. We need to tax the super rich and give ordinary people a say in how our taxes are spent. Join us at takebackpower.net (https://takebackpower.net)."





Today's action comes in the wake of the raid of a Quakers meeting house and the arrest of 15 people during a nonviolence training last week. One other was arrested at their home on Thursday and the houses of seven supporters have been raided by police in connection with these actions so far. (https://takebackpower.net)

This occurs as the UK remains in crisis. Last year, 14 million people in the UK faced the prospect of going hungry due to a lack of money. Whilst in 2024, 6.5 million people turned to food banks. [2]

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Seven arrested at Nonviolence training event as Take Back Power supporters homes raided

April 19, 2026(https://takebackpower.net/2026/04/19/)



Seven people have been arrested at a nonviolence training event held in London. The training was held by Take Back Power, a nonviolent campaign demanding a tax on extreme wealth, to be decided by a 'House of the People.' [1]

At around 12:30 yesterday, dozens of officers raided Millman Street Community Centre in London. Officers arrived in three vans, arresting six people under suspicion of 'conspiracy to commit theft.' One of those arrested was an undercover Daily Mail journalist.

At around 15:20 on Saturday the home of Take Back Power supporter was also raided. The supporter wasn't home and on learning there was a warrant for their arrest they handed themselves in. The police subsequently raided their home for a second time at around 2am this morning.

This weekend's raids occur as Take Back Power supporters joined a counter demonstration in Manchester yesterday, opposing Britain First, a far-right demonstration which was marching in the city. Groups opposing fascist demonstrators were kettled, beaten with trunchons and pepper-sprayed by police.

A Take Back Power spokesperson said:

"Once again the police are raiding homes and community centres, arresting people for simply learning about nonviolence. Meanwhile, police protect fascists marching in Manchester and kettle and beat counter-protestors instead. Such is the state of civil liberties in the UK in 2026. The government and police care more about protecting the interests of corporations and billionaires than protecting the people of this country. We've got to make politics work for ordinary people. We need a House of the People with powers to tax the billionaires destroying this country. If you want to help us make it happen sign up at takebackpower.net (https://takebackpower.net)."





On Saturday, police also attended and shut down a nonviolence training being held in Falmouth, no arrests were made, however the event was cancelled.

Today's raids continue the escalating repression being imposed on nonviolent campaigns. Police have so far shut down four nonviolence trainings held by Take Back Power, in some instances raiding places of worship.

These raids echo the widely unpopular and unprecedented raid in 2025 on Westminster Quakers where Youth Demand supporters were meeting to discuss the genocide in Gaza, which drew widespread condemnation from faith groups. [2]

ENDS

(https://takebackpower.net)

“Nigel for Sale”- Take Back Power takes action at Sotheby’s

April 27, 2026(https://takebackpower.net/2026/04/27/)



Two Take Back Power supporters have taken action at Sotheby’s auction house. Take Back Power is a nonviolent campaign demanding a tax on extreme wealth, to be decided by a ‘House of the People.’ [1]

At around 11:15 this morning, two Take Back Power supporters covered a painting at Sotheby’s Orientalist art pre-auction exhibition, with a picture of Nigel Farage’s face. The image read *“Nigel for sale: £100,000- bought by Sotheby’s”*. The painting covered is King Wilhelm I’s Arabian Stallion ‘Tursi’ by Friedrich Nerly, which is expected to sell for between £80,000- £120,000.

By around 11:35 the action takers had been removed from the building by security, however police didn’t arrive on the scene. At around mid-day, the action takers attempted to hand themselves in at Charing Cross police station. Thus far, no arrests have been made.

Sotheby's describes itself as *the 'world's premier destination for art and luxury'.* Best known for its fine art auctions, it also has a luxury real estate company — Sotheby's realty which has donated £100,000 to Reform. [2]

A Take Back Power spokesperson said:

"Reform claims to be on the side of working people. If that were true, why would the 'world's premier destination for art and luxury', be giving them a donation of £100,000 in exchange for yet more tax breaks on the super rich if they get into power?"

"Reform is another party of the same corrupt corporations and super-rich who are destroying our country, putting the burden of fixing Britain onto working people. In order to fix Britain we need a mass redistribution of wealth and power away from the 1%, back to working people. Help us fix Britain at takebackpower.net (https://takebackpower.net)."





One of those taking action today is Elvis, a delivery driver from Bolton, who said:

"I'm taking action with Take Back Power in order to highlight corruption and inequality in the UK. Sotheby's have donated 100,000 to Reform plc, in exchange for more tax breaks for the super wealthy if they get elected."

"Meanwhile millions of families still struggle to put food on the table every single day. We can make a change if we all come together and build a system that's fairer and more representative of the British people. To find out more go to takebackpower.net (https://takebackpower.net)."

Also taking action today is Jimmy, 74, a retired NGO worker, from London who said:

"There was a time when the super-rich would be taxed at a much higher rate than ordinary working people, and we had a functioning health system and affordable housing. Nowadays corporations and billionaires pay next to no tax through using loopholes and offshore accounts."

“Reform wants to give even more tax breaks to the super wealthy who are already breaking Britain. We need ordinary people at the heart of deciding how to tax extreme wealth to begin fixing Britain. This is why we are calling for a permanent citizen’s assembly, with the power to tax extreme wealth- a ***House of the People****.”*

Reform is backed primarily by the super-rich and corporations. This includes donations from crypto-billionaire Christopher Harborne, Claudia Harmsworth, wife of the owner of the Daily Mail- Lord Rothermere, and London’s leading luxury interior designers- Interior Architecture Landscape. [2]

We need to Take Back our Power from the super-rich, which is why Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen’s assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Take Back Power ‘take over’ the playgrounds of the super-rich

April 30, 2026(https://takebackpower.net/2026/04/30/)



Take Back Power supporters have been ‘taking over’ the playgrounds of the super-rich this morning. Take Back Power is a nonviolent campaign, demanding a tax on extreme wealth, to be decided by a ‘House of the People.’ [1]

At around 10 this morning, 22 Take Back Power supporters occupied a Ferrari dealership in Berkeley Square, they could be heard chanting “WE DEMAND EQUALITY!” and “THE BILLIONAIRES HAVE GOT TO GO!”. By around 10:30 the group left the store.

At around 11:30, the group reconvened at Burlington Arcade- the world’s first modern shopping mall, which positions itself as an ‘elegant and exclusive upmarket shopping venue’. The group could be seen holding signs which read “HOUSE OF THE PEOPLE” and “4 MILLION KIDS IN POVERTY”, which were quickly seized by door staff.

By around 12:20, the group had moved on to the food hall at the luxury department store, Harrod's. Security was much more reactive, dragging Take Back Power supporters from the building.

(https://takebackpower.net)

A Take Back Power spokesperson said:

"This country is in crisis and everyone knows it! The people to blame are the corporations and super-rich who are extracting every last penny from working people, and then using their ownership of the media to distract people into blaming the poor and migrants. Nothing short of a massive transfer of wealth and power away from the 1% and back to working people can hope to fix Britain. Join us at takebackpower.net (https://takebackpower.net)."





One of those taking action today is Robert Pembroke, 43, a builder and dad from Devon, who said:

It's time ordinary people take back our power from the super-rich. Inequality is spiralling out of control, 50 families in the UK hold more wealth than 50% of the country. Around the world, it's even worse with eight men holding more wealth than 50% of the world's population!"

"It is obscene to allow this, people are dying. We need ordinary people, taking part in a permanent citizens' assembly- a ***House of the People*** *deciding how to tackle this. To find out more go to takebackpower.net (https://takebackpower.net)."*





Also taking action today is Ana Heyatawin, 63, a grandmother from Somerset, who said:

"Inequality, which is being imposed on ordinary people by big business, billionaires and the politicians who work for them, is killing people right now. More than a third of people in the UK now don't earn enough to buy life's essentials."

"We need ordinary people at the heart of deciding how to tax extreme wealth to begin fixing this mess. This is why we are calling for a permanent citizen's assembly, with the power to tax extreme wealth- a ***House of the People****."*

It's time working people take back our power from the super-rich. This is why Take Back Power is demanding that the UK government establish a permanent **House of the People—** a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Take Back Power supporters redistribute essential items whilst occupying high-end stores and hotels

May 1, 2026(https://takebackpower.net/2026/05/01/)



Take Back Power supporters have been occupying the playgrounds of the wealthy this morning, and have liberated items from a superstore to redistribute them back to the communities that need them. Take Back Power is a nonviolent campaign, demanding a tax on extreme wealth, to be decided by a **'House of the People.'** [1]

At around 9 this morning, three Take Back Power supporters entered the Tesco Extra on Acre Lane in Brixton, and took essential items from the shelves and left without paying. The action takers then donated the items at a local food-bank

drop-off point. At around 10am, all three attempted to hand themselves in at Brixton Police Station. So far none have been arrested.

At 11:45, around a further 18 Take Back Power supporters occupied the luxury department store Liberty, on Regent Street in London. They could be seen holding signs which read '3 MILLION HOUSEHOLDS SKIPPING MEALS' and 'TAX THE SUPER-RICH NOW.'

At around 1pm, this group then reconvened, disrupting access to the luxury hotel, Claridges. The group could be heard chanting "WE DEMAND EQUALITY!' and 'HOW DO WE TAX THE SUPER RICH?- A HOUSE OF THE PEOPLE!' as security attempted to move the supporters away from the door.

A Take Back Power spokesperson said:

*"Take Back Power is calling for an emergency '**House of the People**' to deal with the cost of living crisis. When politicians are too busy lining their pockets to fix our problems, we need the people most impacted to have a seat at the table. A **House of the People** selected by democratic lottery, like a jury, is a no-brainer solution to cut out the corruption and decide how to redistribute wealth."*





One of those taking action redistributing food today is Moshe Dixon, 25, from Dundee said:

"My mother came from poverty and fought tooth and nail to give me a better future. Like so many mothers she was promised that hard work would be rewarded, yet we are living in a country where so many families can't make ends meet despite working multiple jobs."

"6.5 million people had to turn to foodbanks in 2024. Meanwhile the CEO of Tesco is taking home 430 times the pay of the average Tesco employee, and the rich are paying a smaller share of tax than working people. We need an assembly of ordinary people coming together to decide how to tax extreme wealth in order to fix our broken country. Join us at takebackpower.net (https://takebackpower.net)."





Also taking action today occupying high-end stores and hotels, is Hannah McDonald, 20, a student from Liverpool, who said:

"Fourteen million people last year were faced with the prospect of going hungry, in this, the 6th richest nation on earth! Now we have a cost of living tsunami on the way and the government is nowhere to be seen."

"This is broken Britain. We need a ***House of the People****— an assembly with real power, where ordinary mums, nurses, posties & cleaners, get a real say in how to take back our power from the super rich, and redistribute that wealth and power back to working people."*

Today's actions come as the UK braces for food shortages and soaring prices as a result of the war in Iran, as rising fuel, fertiliser and commodity prices begin to feed into business costs. [2]

It's time we take on the super-rich who are profiteering from a world in crisis. This is why Take Back Power is demanding that the UK government establish an emergency **House of the People—** a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

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

AJW20

This is the exhibit marked "AJW20" in the witness statement of Alexander James Wright.

Look what you made me do.



Two young people received suspended sentences today for spray-painting two private jets at Stansted Airport in June 2024 to demand the UK government negotiate a treaty to phase out oil and gas by 2030. [1]

They were found guilty of criminal damage at Chelmsford Crown Court in September. Jennifer Kowalski, 29, from Dumbarton recieved a 5 month custodial sentence suspended for 12 month, Cole Macdonald, 23, from Brighton was handed a six week custodial sentence suspended for 8 months plus 20 days rehabilitative activity. The two had cut through the wire perimeter fence at Stansted and sprayed paint from a fire extinguisher onto two private jets parked at Stansted Airport, just hours after Taylor Swift's plane had landed. [2]

At trial, the prosecution claimed the planes required extensive professional cleaning costing about £12,000. Judge Mill ruled the damage too serious for the defendants to rely on their rights to free expression and assembly under Articles 10 and 11 of the European Convention on Human Rights. The jury was therefore not allowed to consider whether restricting those rights was a proportionate response to the alleged damage. [3]

After their arrest both were held for 11 days on remand, until released on bail. Cole then spent 39 weeks on curfewed tag (this equals a four month custodial sentences) While tagged Cole was arrested five times for breach of bail, approximately once every two months. Once she was being held in police custody, another time she was in hospital seeking treatment for back pain after informing the monitoring service. None of the five arrested resulted in breaching bail being proven.

Before sentencing Jennifer Kowalski, 29, a former sustainability manager from Dumbarton, said:

"Whilst Taylor and her fans have been celebrating her eras, we have entered a new one – the era of global boiling. This is an era that will not end with a rebrand; it will end all others. As a former Swiftie, I know what Taylor stands to lose, because there is no folklore without human culture, no music on a dead planet.

"The court system can take our freedom, our autonomy, our dignity, and deny us basic rights. But they can never take my convictions, to fight for a future for us all. Whatever happens in a court room, that is who I am today, and they can never change that."

A Just Stop Oil spokesperson said

This trial, the saga of mismanaged draconian bail conditions and the sentences demonstrates, again, the establishment will protect the wealthy and privileged while punishing those seeking to protect us and defend our freedoms and natural justice.

In just seven months of 2022, Taylor Swift's private jet logged 170 flights – 15.9 full days in the air, averaging 80 minutes and 139 miles per trip. Yard, the sustainability marketing firm that compiled the data, estimated her total carbon emissions at 8,293.54 tonnes of CO_2, more than 1,100 times that of an ordinary person over an entire year. [4]

A study published in Nature and reported by National Geographic found that private aviation generated at least 15.6 million tonnes of CO_2 in 2023, with an average of 3.6 tonnes emitted per flight. Almost half of all private-jet journeys were under 500 kilometres,

and around one in five covered less than 200 kilometres, distances that could often be travelled by rail or road. The researchers noted that some aircraft models can emit more carbon in a single hour than an average person produces in an entire year. [5] [6]

The music industry, and even artists of Taylor Swift's stature, are not shielded from the accelerating climate collapse. In November 2023, 23-year-old Ana Clara Benevides collapsed and later died from heat exhaustion while attending Swift's concert in Rio de Janeiro during a record-breaking heatwave that pushed temperatures above 40°C. [7]

In recent months, the musician Steve Miller cancelled his entire North American tour citing the growing threat of extreme weather, describing the decision as unavoidable in light of intensifying heat, floods and wildfires. Artists and organisers are already facing rising costs, cancellations and safety risks as performances are disrupted by record temperatures and severe storms. Extreme weather, driven by fossil fuel combustion, is already endangering lives and reshaping the conditions in which global entertainment operates. [8]

ENDS

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

AJW21

This is the exhibit marked "AJW21" in the witness statement of Alexander James Wright.

FØSSIL FREE LONDON



Fossil Free London is 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. We advocate for a rapid and just transition towards a sustainable and equitable society.

In London? **Sign up to a welcome talk.**

Or join our **mailing list** and follow us on social media.

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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

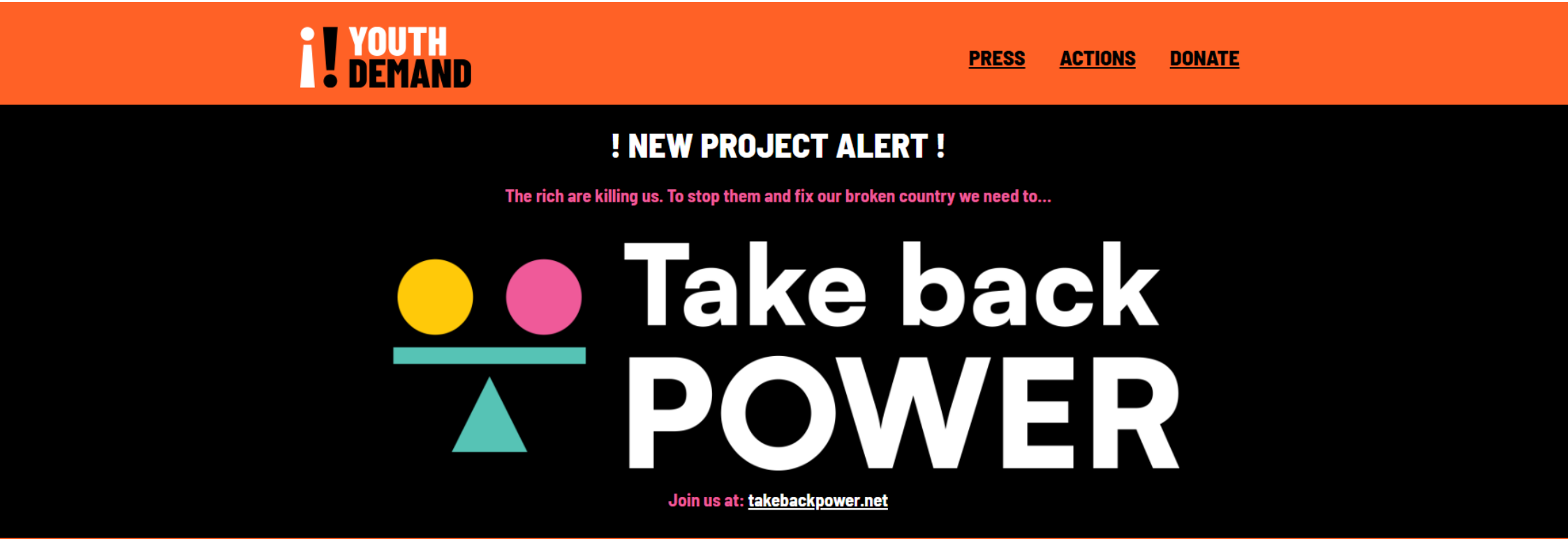
- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW22

This is the exhibit marked "AJW22" in the witness statement of Alexander James Wright.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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

AJW23

This is the exhibit marked "AJW23" in the witness statement of Alexander James Wright.

Two Just Stop Oil supporters found guilty for Heathrow paint spraying following retrial

by **The Canary** — 14 May 2026 in **News**, **UK** Reading Time: 4 mins read

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Two Just Stop Oil supporters who sprayed Heathrow departure boards with orange paint during the Oil Kills international uprising to end fossil fuels in July 2024 have been found guilty in a retrial after the jury in an earlier trial failed to reach a majority decision.

Phoebe Plummer and Jane Touil were appearing before Judge Duncan at Isleworth Crown Court for the second time on a charge of criminal damage over £5,000 for their action on 30 July 2024 to demand a fossil fuel treaty to end oil and gas by 2030.

The jury took four-and-a-half hours to reach a majority verdict of 10-2. Following the verdict, Touil said:

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> *Since I took action, global fossil fuel use and emissions have continued to rise. More than ever, we need a global fossil fuel treaty to help governments rapidly phase out fossil fuels.*
>
> *What we do at this moment in history matters. But there is a difference between laws and morality. The courts apply the law made by powerful people. Morals come from within. It is our morals that give us our conscience. I have always tried to live according to my conscience.*

Plummer said:

> *The climate crisis is the greatest injustice that humanity has ever faced. We should all consider what to do at this time. No individual caused this crisis and no one is solely responsible for stopping it. But we can choose what we do to alleviate suffering.*
>
> *I feel compelled to act to be a responsible citizen, a loving aunt and a good person. It compels me to hope for a better future and one where my nephew grows up.*
>
> *I didn't think the action would change government policy. But non violent civil resistance is a necessary part of tackling the climate crisis and I'm grateful and proud to have been part of that.*

Plummer was remanded for 58 days and Touil for 14 days following the 2024 action in which the pair used fire extinguishers to spray diluted water-based paint in Heathrow Terminal 5 including at the departure boards. The Crown alleged that the action caused £8,000 worth of damages and that three of the display screens needed to be replaced.

Judge ruled out various defences for Heathrow action

At trial, Judge Duncan ruled out several legal defences for the action including those of 'reasonable excuse' under Articles 10 and 11 of the ECHR, 'necessity' and 'self defence' on the grounds that the threat from climate change was not proximate enough and the actions too far removed from the threat.

The defendants were allowed to argue belief in consent: that they honestly believed the owners of Heathrow would have consented to the damage if they knew of its circumstances. However, evidence of the relevant circumstances was to be limited to the fact that it was a climate protest with all evidence about the scale and urgency of the climate crisis ruled 'irrelevant and therefore inadmissible'.

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In giving evidence, Touil said:

> *I genuinely and sincerely believed that if the shareholders [of Heathrow] had a full understanding of the situation we are in they would have given their consent to our action.*
>
> *Most people believe there is something that is wrong with climate but not many people have access to the full situation because the fossil fuel industry has used their immense wealth to ensure that governments do not act and it is not reported in the mainstream media.*
>
> *So I don't know if shareholders have a full understanding, but I know that if they did, they would be doing all in their power to stop fossil fuels because there will be no business as usual, no functioning society, half the population could be wiped out along with 50% of global GDP. I think shareholders want to protect their investment but they also want a future for their kids.*

In her evidence Plummer said:

> *I want to make it very clear that this was not a protest against Heathrow, or anyone flying through Heathrow that day. It's true that the aviation industry is especially harmful to the climate in terms of emissions, though it is a small number of frequent fliers and private jet users who cause the vast majority of this harm, not families who save up for a holiday once a year.*
>
> *But this wasn't about getting people to stop flying. I made this individual change to live in line with my values, but honestly I know that it's pretty inconsequential. Even if we all woke up tomorrow and stopped flying and went vegan, it would be like mopping up a spill from an overflowing bath whilst leaving the tap on.*
>
> *All individual changes are like this when we are facing a systemic issue. If fossil fuels are extracted from the ground, then they will all be burnt, even if it's not on a flight that you're on. We need*

> *systemic change, that has always been Just Stop Oil's demand.*
>
> *My intention was not to cause damage. My intention was to take part in an act of nonviolent civil resistance, raising a serious alarm bell to the catastrophic future in store for us if we persist in our addiction to fossil fuels.*

Featured image via Just Stop Oil

Tags: climate crisis fossil fuels Just Stop Oil protest

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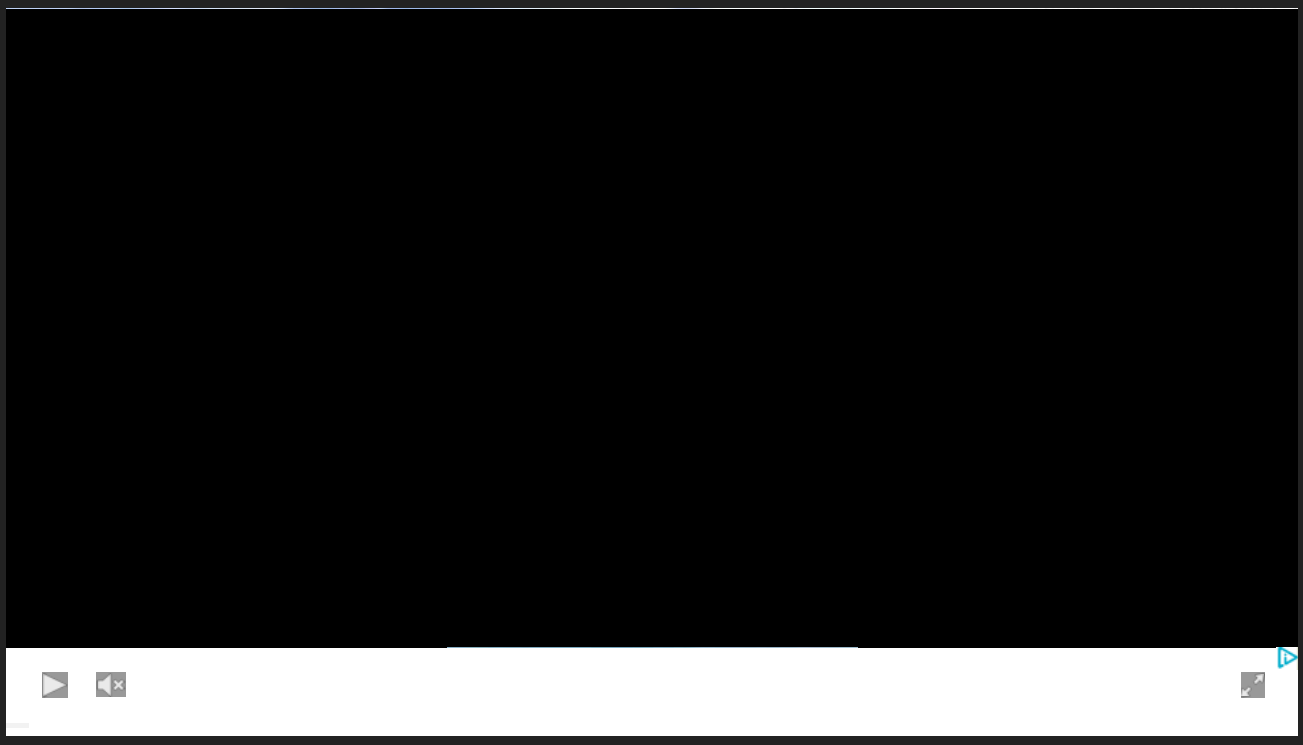
Just Stop Oil activists who sprayed Stonehenge with orange powder cleared of criminal damage

They cited human rights law in their defence

Rod Minchin
Friday 31 October 2025 17:12 GMT



Prosecutors release videos played in trial of Just Stop Oil activists accused of damaging Stonehenge

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Three Just Stop Oil activists who took part in a protest in which Stonehenge was sprayed with orange powder have been found not guilty of criminal damage and causing a public nuisance.

It follows a trial at Salisbury Crown Court where they cited human rights law in their defence.

Then-Oxford University student Niamh Lynch, 23, and Rajan Naidu, 74, had been accused of using two colour blasters filled with cornflour, talc and an orange dye to spray the monument.

Salisbury Crown Court was told the pair – along with a third activist, Luke Watson, 36 – targeted Stonehenge as part of an ongoing fossil fuel protest by the Just Stop Oil group the day before the 2024 summer solstice.

About 15,000 people were due to gather and celebrate at the monument.

Naidu and Lynch had crossed the boundary ropes and trespassed into the area around the monument before launching the attack.



Just Stop Oil protesters sit down after an orange substance was sprayed on Stonehenge *(PA Media)*

Watson had bought the equipment used in the attack and had driven his co-accused to Stonehenge that morning.

Prosecutors alleged the protest had been “carefully planned” and was filmed by other Just Stop Oil supporters with footage released publicly afterwards.

Simon Jones, prosecuting, said: “Putting it simply, we say they were all in it together.

“The prosecution say that this is an act of blatant and clear vandalism. The intention is undoubtedly to make a statement.”

After the attack, Naidu and Lynch, who were both wearing white Just Stop Oil T-shirts, sat down in silence in front of the stones until they were arrested.

The court heard the stones were promptly cleaned. The costs of removing the powder totalled £620.

Mr Jones added: “Stonehenge is arguably the best recognised and architecturally sophisticated prehistoric stone circle in the world, built around 5,000 years ago.

“The site in Wiltshire is visited by members of the public from all over the world, providing both an education and spiritual experience.

“The stones are a protected ancient monument.”





Judge Paul Dugdale told the jury in his legal directions they had to assess where the “balance lies” in the case and whether a conviction would be a “proportionate interference” with the defendants’ rights.

RECOMMENDED

- Footage shows moment Just Stop Oil protesters spray orange paint on Stonehenge, court hears
- Just Stop Oil to end disruptive protests with final demonstration date announced
- Two deny charges over Just Stop Oil protest at Stonehenge
- Two people charged by police after orange paint was thrown at Stonehenge in Just Stop Oil protest

“In any society there will be those whose opinions we agree with and those whose opinions we disagree,” he said.

“The essence of a free society and freedom of speech is that everyone’s entitled to express their opinion even when we disagree with what they say.

“If individuals disagree with what our government is doing on certain matters, they are entitled to protest about the government’s actions or inactions.

“All of this is the essence of our free society. It’s how our society has developed over the centuries, and the reality is we are very fortunate to live in a free society.

“There are times when protecting the right to freedom of speech and freedom to protest can mean that activity that would otherwise be unlawful would be regarded as lawful by the court to protect those rights.”

The jury found Naidu, of Gosford Street, Birmingham; Lynch, of Norfolk Road, Turvey, Bedford; and Watson, of The Street, Manuden, Essex, each not guilty of the two charges after deliberating for six hours.

More about: Stonehenge Just Stop Oil Salisbury Crown Court Human rights law Activists

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Three Just Stop Oil supporters walk free after trial for M25 gantry action

Court & Prison, Press / September 11, 2025

Three Just Stop Oil supporters were found not guilty of public nuisance at Guildford Crown Court today, after peacefully climbing gantries on the M25 in 2022, to demand an end to new fossil fuel projects.[1]

Sam Holland, Rachel Payne and Isabel Rock took action on the M25 on 9th November 2022. They were

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During the trial the prosecution emphasised that this was a planned and coordinated action that resulted in significant delays to the travelling public, that all three defendants were trespassing in a place that was forbidden to the public and that they had taken considerable risks with public safety. Giving evidence National Highways Ltd claimed that traffic was delayed by between 4 and 5 hours and that between 9,000 and 30,000 vehicles were impacted. None of the defendants denied the indictment, but they argued that they had a reasonable excuse for their actions.

Sam Holland argued that he had wanted to prevent harm. He had read academic papers which pointed to catastrophic consequences for humanity from burning fossil fuels, including food system collapse.

Rachel Payne explained that she took action because she was fearful for her children and grandchildren about government inaction on the climate crisis. She highlighted the government breaking its 2015 climate agreements by offering new fossil fuel licences.

Isabel Rock said that she felt a duty to look after people younger than herself and that the climate crisis is going to touch every single part of their lives. Taking action was something she weighed up very seriously and that as a self employed person, she knew how hard it was for people to earn money and to get by. However she felt that if they could see some of these agreed facts about the seriousness of the climate crisis, she hoped they would understand.

The Judge, Recorder L Harris, ruled that it was for the jury to decide whether or not the supporters had a reasonable excuse for their actions.

In their closing speeches, all the defendants were able to refer to the agreed facts in the case, which included several key facts relating to the climate crisis.

In his closing speech, Sam Holland said:

"We brought evidence on the largest evil committed in human history: the continued drilling and burning of oil and gas in full knowledge that large parts of humanity will be killed. The prosecution has said that these are beliefs. They are not beliefs. This is not a cause. This is not another 'issue'. This is billions of deaths. Not according to me, according to the world's leading scientists. These are the facts. If we hit 3C of warming by 2050, there could be four billion human deaths. Half of the world's current population.

"What was the UK government doing? It was issuing over 100 new licences for companies to explore and drill oil and gas in the North Sea. In the knowledge of everything I've just said, which is public knowledge and has been known for decades, the government was still wanting to drill. Unimaginable evil. We all talked about how we had extensively tried other methods for making change. Signing petitions, emailing MPs, going on conventional marches... So we had to turn to disruptive action.'

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"I thank the members of the Jury deeply for their 'common sense' verdict — they were actually permitted to hear the several climate related agreed facts, which were read out to them, about the severe threats the present emergency poses to our world and they listened!

I thank the prosecution for agreeing to those facts following earlier trials I attended in which the 'whole truth' was repeatedly denied to the Jury. I thank the Judge for allowing them to decide that we "more likely than not" had a reasonable excuse for what we did.

In my statement to the police, I urgently expressed my fears for my family and world and my hopes for an 'eco-U- turn'. With this acquittal, I feel this may be closer to being made possible. The tide may well be turning if the agreed facts on climate, allowed in this trial, can become widely known and acted upon internationally."

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.

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: https://juststopoil.org/press-media

Heathrow 10 images here:
https://drive.google.com/drive/folders/1mByhU4LBPB6t5pMAP_-5dJOkhvsxwTNX?usp=sharing

Website: https://juststopoil.org/

Facebook: https://www.facebook.com/JustStopOil/

Instagram: https://www.instagram.com/just.stopoil/

Twitter: https://twitter.com/JustStop_Oil

Youtube: https://juststopoil.org/youtube

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Morning Star for Peace and Socialism

Britain / 29 August 2025

Eight JSO supporters acquitted of public nuisance after petrol station action



JSO activists blocking a service station on the M25 in August 2022. Photo: Just Stop Oil

EIGHT Just Stop Oil activists have been cleared of causing a public nuisance after disrupting Britain's largest petrol station.

Michael Davies, Charles Laurie, Phoebe Frewer, Sophie Sharples, Tez Burns, Peter Lay, Gareth Harper and Emma Ireland took action at Cobham motorway services in Surrey in August 2022.

As part of a wider campaign targeting petrol stations along the M25, the activists were among a group of 35 who also took action at Clacket Lane services in Kent and Thurrock services in Essex.

At Guildford Crown Court on Wednesday, all eight defendants were found not guilty of intentionally or recklessly causing a public nuisance by blocking the entrance to Cobham services.

However, Mx Burns and Mr Lay were found guilty of causing criminal damage, while Mr Laurie was found guilty of possession of a hammer with intent to damage property after two petrol pumps were damaged.

Following the verdict, Ms Ireland said: "I am grateful to the judge and the prosecution for allowing the agreed facts on the climate crisis to have played a part in this trial and for allowing us to speak to our motivations without fear of being found in contempt of court.

"The prosecution spoke about common sense and I was reminded that, in 2022, I felt that common sense would have been for the Conservative government to stop issuing new oil and gas licences, to show a commitment to reducing carbon emissions and, in turn, to offer some protection to humanity from the gravest predictions of climate collapse."



Elizabeth Short

Morning Star for Peace and Socialism

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Hung jury in latest Just Stop Oil gantry case

Court & Prison, Press / July 21, 2025

A Just Stop Oil supporter faces retrial after a jury was unable to reach a verdict in relation to her participation in the M25 gantry climbing actions in November 2022 demanding an end to new oil and gas licencing. [1]

A 12-member jury at Southwark Crown Court was unable to reach a verdict in the case of a Just Stop Oil supporter charged with the new statutory offence of 'causing a public nuisance' under the Police, Crime, Sentencing and Courts Act 2022, following more than 9 hours of deliberations over three days.

Theresa Norton, 66, a former councillor and carer, took part in a Just Stop Oil action on the M25 in November 2022, during which she climbed a gantry near junction 1b on 7 November, to demand an end to all new oil and gas projects – a demand that has since been adopted as official government policy. She did

The CPS has now been allowed 7 days by Judge Tomlinson to determine whether it will pursue a retrial.

In her evidence to the Jury, Norton said:

"I acted on my conscience. My despair turned into action into hope. Sadly, conscience is not a legal defence. Therefore, you'll be directed to ignore this evidence, all that I've said, and come to your verdict only on the evidence as presented by the prosecution. This leaves you with no choice, no agency, you have become part of the machinery of state. Accepting of the cognitive dissonance that can happily see a government declare such statements as seen in the Agreed Facts, whilst simultaneously issuing 130 new oil and gas licences, planning for extra runways at airports, building more roads, refusing to implement plans to insulate our badly designed cold and draughty homes, continuing with subsidies to fossil fuel companies to the tune of millions of pounds a week and delaying investment for sustainable green energy, because the fossil fuel lobby is powerful and generous with donations to influential think tanks.

The climate crisis was only getting worse in 2021. Talks by eminent climate scientists were telling us to act, do something. In 2022, a third of Pakistan was under flood water- 1700 dead, 13,000 injured, 8 million displaced. Portugal, Germany and France had rampant wildfires. In July there were wildfires in UK and 40 degrees in London for the first time. London Fire Brigade had its busiest day since WW2.

Civil resistance is a communicative act. It communicates that something is very wrong and needs to change. It is not trying to seize power in a violent armed revolution. It is nonviolent and peaceful. Facts, information and science do not motivate people to change. Tell a smoker that smoking kills and they'll carry on. Facts are not what powers the human heart. That's why just talking about science will not save us and quoting all the statistics in the world will not move us to change. You have to bring emotions into it. Nonviolent direct action has a history of effecting change. We've been vindicated. That oil and gas will stay in the sea. But I stand here because I maintain the courage of my convictions. I believe that when we see clearly through that state machinery, it is only our collective conscience that can truly be relied upon."

During the trial, the Crown prosecution acknowledged the findings of the 2020 Net Zero Interim report, which stated:

"Climate change is an existential threat to humanity. Without global action to limit greenhouse gas emissions, the climate will change catastrophically with almost unimaginable consequences for societies across the world." [3]

Additionally, the prosecution agreed upon the established scientific consensus that warming exceeding 1.5 degrees Celsius above pre-industrial levels poses 'catastrophic' and 'irreversible' risks to humanity. It was further accepted that the average global temperature rise for the year ending 2024 was 1.65 degrees Celsius, with projections indicating that warming would permanently surpass 1.5 degrees Celsius before 2030.

Just Stop Oil continues to stand by those prosecuted for peaceful resistance against fossil fuel expansion in the face of rapidly accelerating climate collapse.

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: https://juststopoil.org/press-media

Website: https://juststopoil.org/

Facebook: https://www.facebook.com/JustStopOil/

Instagram: https://www.instagram.com/just.stopoil/

Twitter: https://twitter.com/JustStop_Oil

Youtube: https://juststopoil.org/youtube

TikTok: https://www.tiktok.com/@juststopoil

Notes to Editors

[1] Just Stop Oil is a member of the A22 Network of civil resistance projects.

April 26th 2025 was the last Just Stop Oil action, but our supporters will continue to tell the truth in the courts, speak out for our political prisoners, and call out the UK's oppressive anti-protest laws.

Just Stop Oil continues to rely on small donations from the public to make this happen.

[2] https://juststopoil.org/2023/10/30/no-prison-for-m25-injunction-breakers/

[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004025/210615_NZR_interim_report_Master_v4.pdf

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Palestine Action

This article is more than **4 months old**

Palestine Action activists cleared of aggravated burglary at Israeli defence firm site

None of the six activists were convicted of any offence over break-in at Elbit Systems factory near Bristol in 2024

Haroon Siddique *Legal affairs correspondent*

Wed 4 Feb 2026 13.54 GMT

Prefer the Guardian on Google

Six Palestine Action activists have been cleared of committing aggravated burglary over a break-in at an Israeli defence firm's UK site.

Charlotte Head, Samuel Corner, Leona Kamio, Fatema Rajwani, Zoe Rogers and Jordan Devlin were accused of threatening unlawful violence and using sledgehammers as weapons after a prison van was driven into Elbit Systems' factory in Filton, near Bristol, on 6 August 2024.

But after a trial at Woolwich crown court, south London, none were convicted of any offence.

All six were acquitted of aggravated burglary, which carries a maximum sentence of life imprisonment, and jurors found Rajwani, Rogers and Devlin not guilty of violent disorder.

The jury deliberated for 36 hours and 34 minutes but could not reach verdicts for charges of criminal damage against any of the six defendants. This was in spite of all of the defendants, except Devlin, telling jurors they had entered the factory without permission and damaged Elbit's equipment including computers and drones.

Additionally, no verdict was reached in the allegation that Corner, 23, inflicted grievous bodily harm on police sergeant Kate Evans, or on the charges of violent disorder against Head, Corner and Kamio.

Before the verdicts on Wednesday, Mr Justice Johnson told the jurors he was not going to ask them to deliberate further, because "you believe that you can go no further than you have got to already".

The activists hugged one another in the dock as a dozen of their supporters cheered from the public gallery above.

Deanna Heer KC, prosecuting, had told the jury that the defendants were all armed with sledgehammers, which she said were not only intended to be used to damage property but also as weapons "to be used if necessary to threaten and damage people".

Heer alleged security guards were sworn at, had sledgehammers swung at them and were whipped, while one was sprayed with a foam fire extinguisher.

Rajiv Menon KC, representing Head, said any violence by the defendants was clearly unplanned, that the defendants had not expected security guards to enter the factory and were "completely out of their depth".

He compared Head to the suffragettes, while describing Elbit Systems, of which Elbit Systems UK is a subsidiary, as a "dreadful company [that] has played a critical role in the killing of tens of thousands of Palestinians".

The defence also argued that the security team had used excessive force and pointed to missing CCTV footage.

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During the trial one juror asked the judge whether it would count as a lawful excuse if a defendant believed they were performing a life-saving action by destroying weapons used to kill civilians in an illegal genocide. Johnson said it would not, but Menon reminded the jurors of their absolute right to acquit.

Heer and Johnson both told the jurors, before they began deliberating, that they should disregard their views on the conflict in the Middle East.

After the verdicts, Rogers' mother, Clare, said: "Our loved one's action against Elbit Systems and the state's brutal response have exposed the true values of the government. The government is determined to do business with Israel and protect its weapons industry at any cost.

"Our loved ones dared to poke this beast - and no expense has been spared in policing, prosecuting and imprisoning them without trial. Imagine if the government had put the same amount of money, resources and political will into preventing a genocide."

A spokesperson for Defend Our Juries, which has organised rallies opposing the ban on Palestine Action, which took effect on 5 July last year, said the verdicts were "a huge blow to government ministers" who had "tried to portray Palestine Action as a violent group to justify banning it under badly drafted terrorism legislation".

Amnesty International also said it showed how disproportionate the proscription decision was.

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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

AJW24

This is the exhibit marked "AJW24" in the witness statement of Alexander James Wright.

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.

N244

Application notice

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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) **PBA0087211**	**Help with Fees – Ref. no.** (if applicable) H W F - -
Warrant no. (if applicable)	
Claimant's name (including ref.) London City Airport Limited and other	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	18 June 2026 18 Jun 2026

HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
KB-2024-001765

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

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?
   The Claimants seek permission, pursuant to CPR 17.1, to amend the Claim Form and Particulars of Claim in the form accompanying this application, so as to amend the definition of the Defendants (Persons Unknown).

   The Claimants ask that this application be considered and heard at the second annual review of the injunctions granted pursuant to the order of Mr Justice Julian Knowles dated 20 June 2024, which has been listed to take place on 30 June 2026 (together with the second annual review of the injunctions granted in actions KB-2024-002132, KB-2024-002317 and KB-2024-002473).

   The Claimants will file a draft form of order ahead of such hearing, which will provide for this application.

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: 30 June 2026 (second annual review hearing)

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

9. Who should be served with this application?	Defendants (Persons Unknown)
9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.	The Claimants will arrange for service on the Defendants (Persons Unknown)

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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.

We refer to the witness statement of Alexander James Wright dated 11 June 2026 which has previously been filed with the Court in these proceedings.

The Claimants apply for permission to amend the Claim Form and Particulars of Claim in the form enclosed with this application so as to amend the definition of the Defendants (Persons Unknown) in the light of the evidence contained within such witness statement - which the Claimants respectfully submit should be reflected in the statements of case and the definition of the Defendants (Persons Unknown).

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

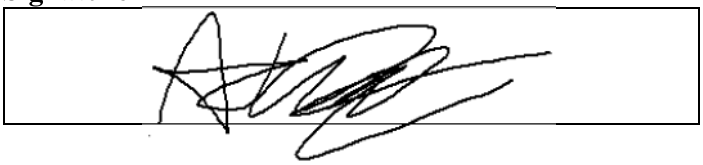
Statement of Truth

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
18	June	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

+44 750 057 8620

Fax phone number

DX number

Your Ref.

292659.000057/WRIGHTAX

Email

alexwright@eversheds-sutherland.com

Amended pursuant to the Order of Bourne J dated 24 June 2025

Draft Re-Amended Claim Form

Claim Form

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 – –

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	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

HIGH COURT OF JUSTICE SEAL 12 Jun 2024 QUEEN'S BENCH DIVISION

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

* CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHER WEALTH INEQUALITY

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

KB-2024-001765

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	

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

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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	0 6	2 0 2 4

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

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AMENDED PURSUANT TO THE ORDER OF [ ] DATED [ ]

IN THE HIGH COURT OF JUSTICE **CLAIM NO:**
KING BENCH DIVISION

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 THE 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

[DRAFT] 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/tZIoduqpqTMtE9dgMMhlaymvEZgO45jgJ19A)*
>
> *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.

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): "N*o 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 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~~

~~Partner~~

Eversheds Sutherland (International) LLP

Claimants' solicitor

Party: Claimants
Name: Alexander James Wright
Date: 24 June 2026
Exhibits: "AJW1 – AJW16"

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

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 various 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 – AJW16**".

1.4 The background to these proceedings is set out in my witness statement of 11 June 2026 in each of the subject proceedings, which concern injunctions that were sought and obtained in 2024 to protect various airports against the threat of direct/unlawful protest activity in four separate actions - being:

	Airport(s)	**Action Number**	**Judge / Date of Order**
1	London City Airport	KB-2024-001765	Mr Justice Julian Knowles 20 June 2024 ("**the Knowles J Order**")
2	Manchester Airport, Stansted Airport and East Midlands Airport	KB-2024-002132	HHJ Rosalind Coe 5 July 2024 ("**the HHJ Coe KC Order**")
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) ("**the Ritchie J Order**")
6	Birmingham Airport, Bristol Airport and Liverpool Airport	KB-2024-002473	Mr Justice Jacobs 6 August 2024 ("**the Jacobs J Order**")

(together "**the Claims**")

(the Knowles J Order, the HHJ Coe KC Order, Ritchie J Order and Jacobs J Order together "**the 2024 Orders**", a copy of which are exhibited at **Exhibit AJW1**).

1.5 So as to make better use of the Court's time, the various Claimants in the Claims agreed in 2025 to join together and to ask the Court to undertake the first annual review of the injunctions granted in them at the same hearing. The first annual review was heard on 24 June 2025 ("**the First Review Hearing**") and the injunctions granted pursuant to the 2024 Orders were continued for a further 12 months by Orders dated 24 June 2025 of Bourne J ("**the 2025 Orders**"), a copy of which are exhibited at **Exhibit AJW2**.

1.6 The second annual review of the injunctions granted pursuant to the 2024 Orders has been listed to take place at hearing on 30 June 2026 ("**the Second Review Hearing**").

1.7 This witness statement follows my witness statement of 11 June 2026 in each of the subject proceedings and is made in support of the second annual review of the injunctions granted pursuant to the 2024 Orders and to:

1.7.1 confirm the steps taken to serve / provide notice of the Second Review Hearing and relevant documents in each of the Claims in respect of it;

1.7.2 provide further information in respect of two matters dealt with in my witness statement of 11 June 2026 in action KB-2024-001765 (London City Airport) only – concerning the updated Warning Notices affixed at this airport following the First Review Hearing and the formatting issue identified with the plan attached to the 2025 Order in this action.

2. NOTICE OF THE SECOND REVIEW HEARING

Uploading Notice of the Second Review Hearing to each airport's relevant injunction website

2.1 The following representatives of each of the subject airports has confirmed to me that a notice, providing notice of the Second Review Hearing and stating where relevant and applicable documents to it can be found, was uploaded to their airport's relevant injunction website by the date specified in the following table.

Airport	Relevant Date	Representative
London City Airport	10 June 2026	Claire Hortop, Head of Legal
Manchester Airport	10 June 2026	Rebecca Bainbridge, Senior Legal Counsel (Airports)
Stansted Airport	10 June 2026	
East Midlands Airport	10 June 2026	
Leeds Bradford Airport	12 June 2026	Claire Acklam, Senior Legal Counsel
London Luton Airport	12 June 2026	David Morris, Head of Legal
Newcastle International Airport	10 June 2026	Mark Hunt, Chief Financial Officer
Birmingham Airport	10 June 2026	Kristin Garrett, General Counsel
Liverpool John Lennon Airport	12 June 2026	John Irving, Chief Executive Officer
Bristol Airport	12 June 2026	Graeme Gamble, Chief Operating Officer

2.2 I can confirm that I reviewed each of the relevant injunction websites on 15 June 2026 and exhibit screenshots, taken by me that day, of the relevant injunction websites at **Exhibit AJW3**, which shows that a notice of hearing is uploaded to each.

Sending Notice of the Second Review Hearing by email

2.3 I can confirm that I sent emails on 11 and 12 June 2026, in respect of each of the four actions, giving notice of the Second Review Hearing, to each of the email addresses referred to in Schedule 3 to each of the 2024 Orders, as well as to the following additional email addresses:

2.3.1 info@takebackpower.net and press@takebackpower.net which are understood to be linked to Take Back Power;

2.3.2 shut_the_system_info@proton.me, which is understood to be linked to Shut the System;

2.3.3 campaigner@fossilfreelondon.org and operations@fossilfreelondon.org which are understood to be linked to Fossil Free London;

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

2.3.5 enquiries@extinctionrebellion.co.uk; and

2.3.6 enquiries@extinctionrebellion.uk for the reasons explained below at paragraph 2.6.

A copy of the relevant emails is exhibited at **Exhibit AJW4**

2.4 I sent such email to the above additional email addresses in the interests of taking reasonable steps to bring the Second Annual Review Hearing to the attention of those potentially affected by it, having reviewed and obtained details of such email addresses from the Take Back Power website, the Shut the System Instagram page (there being no website for Shut the System), the Fossil Free London website and the Youth Demand website.

2.5 I can further confirm that 10 automatic responses were received in response to the above emails sent on 11 and 12 June 2026. Having reviewed the timings of the automated responses, I can confirm that:

2.5.1 5 automatic responses were received from shut_the_system_info@proton.me, noting that the "Recipient mailbox is full". I understand from previous discussions with this firm's IT team, in respect of separate, similar proceedings and following receipt of equivalent email automatic responses, that these emails were properly sent but will not have been delivered to or received by the recipient mailbox as the mailbox was full; and

2.5.2 5 further automatic response were received from enquiries@extinctionrebellion.co.uk which advised that the email could not be delivered as the "recipient's email address is possibly incorrect".

Copies of the relevant emails are exhibited at **Exhibit AJW5**.

2.6 On receiving the first automatic response from the email address enquiries@extinctionrebellion.co.uk, being in response to the email which I sent in respect of action KB-2024-002132 (Manchester Airport, Stansted Airport and East Midlands Airport), I reviewed the Extinction Rebellion Website and noticed that it listed a similar, albeit slightly different address, enquiries@extinctionrebellion.uk. On noting this, I can confirm that I sent a copy of my initial email to this email account, the same day (11 June 2026) (a copy of which is also exhibited at **Exhibit AJW4**), and thereafter included this email address as an initial recipient to each of the emails subsequently sent.

2.7 No other responses (automatic or otherwise) were received to the emails sent. Save as set out above, I have no reason to believe that any emails were not delivered and/or received and therefore consider that they were delivered.

Affixing of Notice of the Second Review Hearing

2.8 The Claimants affixed notice of the Second Review Hearing (stating where relevant and applicable documents to it can be found) at each of the relevant airport injunction warning notice locations (identified by an "X" on each of the relevant airport injunction plans appended to the 2024 Orders (as applicable)). A copy of the applicable notices are exhibited at **Exhibit AJW6**.

2.9 The following representatives of each of the subject airports has confirmed to me that such notices were, save with respect to East Midlands Airport, affixed by the date specified in the following table:

Airport	Relevant Date	Representative
London City Airport	11 June 2026	Claire Hortop, Head of Legal
Manchester Airport	12 June 2026	Rebecca Bainbridge, Senior Legal Counsel (Airports)
Stansted Airport	15 June 2026	
East Midlands Airport*	15 June 2026	
Leeds Bradford Airport	15 June 2026	Claire Acklam, Senior Legal Counsel
London Luton Airport	12 June 2026	David Morris, Head of Legal
Newcastle International Airport	15 June 2026	Mark Hunt, Chief Financial Officer
Birmingham Airport	15 June 2026	Kristin Garrett, General Counsel
Liverpool John Lennon Airport	15 June 2026	John Irving, Chief Executive Officer
Bristol Airport	15 June 2026	Graeme Gamble, Chief Operating Officer

2.10 In respect of East Midlands Airport, I have been advised by Rebecca Bainbridge, Senior Legal Counsel (Airports) that it was not possible to access one of the warning notice locations on or before 15 June 2026 due to road closures put in place for the annual 'Download Festival' at the neighbouring Donington Park. Ms Bainbridge has confirmed to me that a notice was affixed at the relevant location on 19 June 2026.

2.11 Taking the above steps together, I confirm that sufficient notice of the Second Review Hearing has been provided in accordance with the provisions of the 2024 Orders and 2025 Orders.

Informing Third Party Occupiers of the Second Review Hearing

2.12 I previously advised, in my witness statement of 11 June 2026 in action:

2.12.1 KB-2024-002473 (Birmingham Airport, Bristol Airport and Liverpool Airport), that third party occupiers within the 'red line' of the injunction order boundary at Birmingham Airport would be informed ahead of the Second Review Hearing that an application has been made to continue the injunction in respect of Birmingham Airport for a further 12 months. I can confirm that Kristin Garrett (General Counsel for Birmingham Airport) informed me on 15 June 2026 that third party occupiers had been notified as such; and

2.12.2 KB-2024-002132 (Manchester Airport, Stansted Airport and East Midlands Airport) that third party occupiers within the 'red line' of the injunction order boundary at Manchester Airport, Stansted Airport and East Midlands Airport would be informed ahead of the Second Review Hearing that an application has been made to continue the injunction in respect of these airports for a further 12 months. I can confirm that David McBride (Head of Legal at Manchester Airport Group) has informed me that this process is ongoing and that third party occupiers were previously advised of the initial application for an injunction in 2024 and that no issue or objection has been raised by any third parties to date.

Providing a copy of the Formal Listing Notice

2.13 The Court issued a Formal Listing Notice in each of the Claims on 19 June 2026, listing the Second Review Hearing for 30 June 2026. I explain below, at paragraph 5.4, that a copy of this was sent on 19 June 2026 to each of the email addresses referred to in Schedule 3 to each of the 2024 Orders, as well as to the additional email addresses set out at paragraph 2.3. In addition, the following representatives of each of the subject airports has confirmed to me that a copy of the applicable Formal Listing Notice was uploaded to their airport's relevant injunction website by the date specified in the following table.

Airport	**Relevant Date**	**Representative**
London City Airport	19 June 2026	Claire Hortop, Head of Legal
Manchester Airport	22 June 2026	Rebecca Bainbridge, Senior Legal Counsel (Airports)
Stansted Airport	22 June 2026	
East Midlands Airport	22 June 2026	
Leeds Bradford Airport	19 June 2026	Claire Acklam, Senior Legal Counsel
London Luton Airport	22 June 2026	David Morris, Head of Legal
Newcastle International Airport	22 June 2026	Mark Hunt, Chief Financial Officer
Birmingham Airport	19 June 2026	Kristin Garrett, General Counsel
Liverpool John Lennon Airport	23 June 2026	John Irving, Chief Executive Officer
Bristol Airport	22 June 2026	Graeme Gamble, Chief Operating Officer

3. THE CLAIMANTS' APPLICATIONS DATED 2 JUNE 2026

3.1 I detail here the steps taken to serve (a) the Claimants' applications dated 2 June 2026, which sought the listing of the Second Review Hearing; and (b) the court orders granted pursuant to such applications.

3.2 I can confirm that I served a copy of the relevant sealed applications and court orders in each of the subject proceedings under cover of emails sent on the dates detailed in the below table to each of the email addresses referred to in Schedule 3 to each of the 2024 Orders, as well as to the additional email addresses set out at paragraph 2.3.

Airport	**Date Sealed Application Received**	**Date Court Order Received**	**Date Email Sent**
London City Airport	11 June 2026	11 June 2026	11 June 2026
Manchester Airport	16 June 2026	15 June 2026	16 June 2026
Stansted Airport			
East Midlands Airport			

Leeds Bradford Airport	16 June 2026	16 June 2026	16 June 2026
London Luton Airport			
Newcastle International Airport			
Birmingham Airport	16 June 2026	16 June 2026	16 June 2026
Liverpool John Lennon Airport			
Bristol Airport			

A copy of the relevant emails are exhibited at **Exhibit AJW7**.

3.3 I can further confirm that 8 automatic responses were received in response to the above emails sent above. Having reviewed the timings of the automated responses, I can confirm that:

3.3.1 4 automatic responses were received from shut_the_system_info@proton.me, noting that the "Recipient mailbox is full". I understand from previous discussions with this firm's IT team, in respect of separate, similar proceedings and following receipt of equivalent email automatic responses, that these emails were properly sent but will not have been delivered to or received by the recipient mailbox as the mailbox was full; and

3.3.2 4 further automatic response were received from enquiries@extinctionrebellion.co.uk which advised that the email could not be delivered as the "recipient's email address is possibly incorrect".

Copies of the relevant emails are exhibited at **Exhibit AJW8**.

3.4 The following representatives of each of the subject airports has confirmed to me that a copy of the applicable sealed application and court order was uploaded to their airport's relevant injunction website by the date specified in the following table.

Airport	**Relevant Date**	**Representative**
London City Airport	12 June 2026	Claire Hortop, Head of Legal
Manchester Airport	16 June 2026	Rebecca Bainbridge, Senior Legal Counsel (Airports)
Stansted Airport	16 June 2026	
East Midlands Airport	16 June 2026	
Leeds Bradford Airport	16 June 2026	Claire Acklam, Senior Legal Counsel
London Luton Airport	17 June 2026	David Morris, Head of Legal
Newcastle International Airport	16 June 2026	Mark Hunt, Chief Financial Officer
Birmingham Airport	16 June 2026	Kristin Garrett, General Counsel

Liverpool John Lennon Airport	18 June 2026	John Irving, Chief Executive Officer
Bristol Airport	16 June 2026	Graeme Gamble, Chief Operating Officer

4. **FILING AND SERVING OF THE EVIDENCE IN SUPPORT OF THE SECOND REVIEW HEARING**

Filing

4.1 The Claimants' evidence in support of the Second Review Hearing is my witness statement of 11 June 2026, together with accompanying exhibits, in each of the subject proceedings.

4.2 I can confirm that my witness statement of 11 June 2026, together with accompanying exhibits, was filed in each of the subject proceedings with the Court by CE-File on 11 June 2026.

4.3 It came to my attention on 12 June 2026 that an incorrect plan was included within one of the exhibits to my witness statement in action KB-2024-001765 (London City Airport). This mistake was rectified and a replacement copy of these exhibits was filed with the Court by CE-File that same day.

Serving

4.4 I can confirm that I served a copy of my witness statement of 11 June 2026, together with accompanying exhibits, in each of the subject proceedings under cover of the emails that I sent on 11 and 12 June 2026, being the same emails I refer to and deal with above at paragraphs 2.3 to 2.7 and which are exhibited at **Exhibit AJW4**. The email of 12 June 2026 was sent to serve the replacement copy of my exhibits in action KB-2024-001765 (London City Airport) – the reason for which is explained at paragraph 4.3.

4.5 The following representatives of each of the subject airports has confirmed to me that a copy of the applicable sealed application and court order was uploaded to their airport's relevant injunction website by the date specified in the following table.

Airport	**Relevant Date**	**Representative**
London City Airport	12 June 2026, with replacement copy of my exhibit uploaded 15 June 2026	Claire Hortop, Head of Legal
Manchester Airport	12 June 2026	Rebecca Bainbridge, Senior Legal Counsel (Airports)
Stansted Airport	12 June 2026	
East Midlands Airport	12 June 2026	
Leeds Bradford Airport	12 June 2026	Claire Acklam, Senior Legal Counsel
London Luton Airport	12 June 2026	David Morris, Head of Legal
Newcastle International Airport	12 June 2026	Mark Hunt, Chief Financial Officer
Birmingham Airport	12 June 2026	Kristin Garrett, General Counsel

Liverpool John Lennon Airport	12 June 2026	John Irving, Chief Executive Officer
Bristol Airport	15 June 2026	Graeme Gamble, Chief Operating Officer

4.6 Taking the above steps together, I confirm that the evidence in support of the Second Review Hearing has been filed and served in accordance with the provisions of the 2024 Orders and 2025 Orders.

5. **FILING AND SERVING OF THE CLAIMANTS' APPLICATIONS DATED 18 JUNE 2026**

5.1 The relevant Claimants in each of the Claims made an application dated 18 June 2026 to, in short, amend the Claim Form and/or the Particulars of Claim in each of the proceedings.

5.2 Save in respect of actions KB-2024-001765 (London City Airport), KB-2024-002132 (Manchester Airport, Stansted Airport and East Midlands Airport) and KB-2024-002317 (Leeds Bradford Airport, London Luton Airport and Newcastle International Airport), which requires an additional step to be taken, the 2024 Orders require such application to be served by:

5.2.1.1 uploading a copy to each individual airport's relevant injunction website; and

5.2.1.2 sending a copy to the email addresses referred to in Schedule 3 to each of the 2024 Orders.

5.3 The following representatives of each of the subject airports has confirmed to me that a copy of the applicable application was uploaded to their airport's relevant injunction website by the date specified in the following table.

Airport	**Relevant Date**	**Representative**
London City Airport	19 June 2026	Phoebe Moore-Martin, Trainee Solicitor
Manchester Airport	19 June 2026	Rebecca Bainbridge, Senior Legal Counsel (Airports)
Stansted Airport	22 June 2026	
East Midlands Airport	19 June 2026	
Leeds Bradford Airport	19 June 2026	Claire Acklam, Senior Legal Counsel
London Luton Airport	22 June 2026	David Morris, Head of Legal
Newcastle International Airport	19 June 2026	Mark Hunt, Chief Financial Officer
Birmingham Airport	19 June 2026	Ruchi Sharma, Senior Legal Counsel
Liverpool John Lennon Airport	22 June 2026	John Irving, Chief Executive Officer
Bristol Airport	22 June 2026	Graeme Gamble, Chief Operating Officer

5.4 I can confirm that I sent emails on 19 June 2026, in respect of each of the four Claims, serving a sealed copy of the relevant applications dated 18 June 2026 and a copy of the applicable Formal Listing Notice issued by the Court on 19 June 2026, listing the Second Review Hearing for 30 June 2026, to each of the email addresses referred to in Schedule 3 to each of the 2024 Orders, as well as to the additional email addresses set out at paragraph 2.3. A copy of these are exhibited at **Exhibit AJW9**.

5.5 I can further confirm that 8 automatic responses were received in response to the above emails sent. Having reviewed the timings of the automated responses, I can confirm that:

5.5.1 4 automatic responses were received from shut_the_system_info@proton.me, noting that the "Recipient mailbox is full". I understand from previous discussions with this firm's IT team, in respect of separate, similar proceedings and following receipt of equivalent email automatic responses, that these emails were properly sent but will not have been delivered to or received by the recipient mailbox as the mailbox was full; and

5.5.2 4 further automatic response were received from enquiries@extinctionrebellion.co.uk which advised that the email could not be delivered as the "recipient's email address is possibly incorrect".

Copies of the relevant emails are exhibited at **Exhibit AJW10**.

5.6 No other responses (automatic or otherwise) were received to the emails sent. Save as set out above, I have no reason to believe that any emails were not delivered and/or received and therefore consider that they were delivered.

5.7 In respect of actions KB-2024-001765 (London City Airport), KB-2024-002132 (Manchester Airport, Stansted Airport and East Midlands Airport) and KB-2024-002317 (Leeds Bradford Airport, London Luton Airport and Newcastle International Airport) the additional step required is for a notice to be affixed at those locations marked with an "X" on the relevant airport's injunction plan appended to the 2024 Orders (as applicable) stating that the application has been made and where it can be accessed in hard copy and online. I can confirm that I have been informed by:

5.7.1 Phoebe Moore-Martin, Trainee Solicitor for London City Airport that a copy of the relevant notice was affixed at the relevant locations at London City Airport by 19 June 2026;

5.7.2 David McBride (Head of Legal at Manchester Airport Group) that a copy of the relevant notices was affixed at the relevant locations at Manchester Airport, Stansted Airport and East Midlands Airport by 24 June 2026;

5.7.3 Harriet Baylis, Legal Counsel for London Luton Airport, that a copy of the relevant notice was affixed at the relevant locations at London Luton Airport by 24 June 2026;

5.7.4 Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport that a copy of the relevant notice was affixed at the relevant locations at Leeds Bradford Airport by 22 June 2026; and

5.7.5 Mark Hunt, Chief Financial Officer for Newcastle International Airport, that a copy of the relevant notice was affixed at the relevant locations at Newcastle International Airport by 22 June 2026.

A copy of the applicable notices affixed are exhibited at **Exhibit AJW11**.

5.8 Taking the above steps together, I confirm that the Claimants' applications dated 18 June 2026 have been served in accordance with the provisions of the 2024 Orders and 2025 Orders.

6. **LONDON CITY AIRPORT ORDER PLAN AND AMENDED CLAIM FORM**

6.1 As I explain at paragraph 4.6 of my witness statement of 11 June 2026 in action KB-2024-001765 (London City Airport), it came to my attention during the course of preparing that witness statement that there was a 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.

6.2 My earlier witness statement explains that, having reviewed this firm's file for these proceedings, I can confirm that the uploaded copy was the sealed copy of the 2025 Order issued by the Court following the First Review Hearing.

6.3 To explain the position further: at the First Review Hearing, permission to amend was sought to substitute Plan 1 to the Claim Form (a copy of which is exhibited at **Exhibit AJW12**). That was because, in the case of London City Airport, the Claimants' claim was based solely on trespass, so they had taken the approach of excluding all areas to which they did not have an immediate right of possession. As a result, certain areas within the red line plan representing the airport were 'carved out'. Following the grant of the original injunction by the 2024 Order, third party rights were granted over a further area so it was decided that, in the interests of taking a consistent approach, that should also become a 'carved out' area. A revised plan 1 was then to be annexed to the Claim Form and also needed to be substituted for plan 1 to the Knowles J Order. The original version of the plan 1 is at **Exhibit AJW13** and the revised version of the plan is at **Exhibit AJW14**.

6.4 Mr Justice Bourne gave permission to amend the Claim Form in that claim and also varied the Knowles J Order, including by substituting the plan at Plan 1 for the revised plan. The Claimants' counsel were asked by the Court to draw up minutes of order in each claim for the Court to approve and then seal.

6.5 Having reviewed matters further with junior counsel who attended the First Review Hearing, Evie Barden, I can confirm that the copy of the order submitted to the Court for sealing following such hearing did not contain this formatting issue – a copy of the relevant email from Ms Barden to Mr Justice Bourne's clerk and the attachment which is the minute of order for sealing are exhibited at **Exhibit AJW15**. Taking the above together, it appears to me that the formatting issue arose during the course of this order being sealed by the Court and then returned to Eversheds Sutherland (International) LLP. It is regrettable that this was not identified at the time.

6.6 After finalising my witness statement of 11 June 2026, it came to my attention that steps had not been taken following the First Review Hearing to file an amended Claim Form for sealing by the Court, further to the permission granted by Mr Justice Bourne to do so at that hearing - to substitute the plan at Plan 1 for the revised plan. I do not know why this was not dealt with at the time by 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. On becoming aware of this, I instructed colleagues to do so and can confirm that an amended Claim Form was provided to the Court for sealing on 15 June 2026 and that provision of this is awaited as at the time that I sign this witness statement. I will arrange for a copy of the amended Claim Form to be served promptly following receipt of a sealed copy from the Court.

6.7 **LONDON CITY AIRPORT – UPDATED WARNING NOTICES**

6.8 As I explain at paragraph 4.4 of my witness statement of 11 June 2026 in action KB-2024-001765 (London City Airport), updated Warning Notices were affixed at relevant locations at this airport following the First Review Hearing. My witness statement omitted to exhibit a copy of such updated Warning Notice, a copy of which is exhibited at **Exhibit AJW16** for completeness.

6.9 Those updated Warning Notices have the complete plan of London City Airport (i.e. they do not have the plan with the formatting error in the sealed 2025 Order but reflect Plan 1 which was put before Mr Justice Bourne at the hearing on 24 June 2025).

7. **ADDITIONAL MATTERS**

7.1 In the interests of completeness, I can also confirm:

7.1.1 that, whilst not necessary pursuant to the terms of the 2025 Orders, the Claimants uploaded:

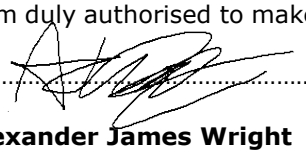
7.1.1.1 a copy of the judgment of Bourne J from the First Review Hearing was uploaded to each of their respective injunction websites during the course of August 2025 (which I can confirm having reviewed this firm's file for the subject proceedings); and

7.1.1.2 a note of the First Review Hearing during the course of the week commencing 15 June 2026 (having reviewed the relevant injunction websites myself prior to signing this witness statement).

7.1.2 having been informed, respectively, by Claire Acklam (Senior Legal Counsel for Leeds Bradford Airport) and Mark Hunt (Chief Financial Officer for Newcastle International Airport), that a copy of the 2025 Orders (as applicable) was affixed by 15 June 2026 at Leeds Bradford Airport and Newcastle Airport at each of the relevant airport's injunction warning notice locations (identified by an "X" on each of the relevant airport injunction plans appended to the 2024 Orders (as applicable).

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

24 June 2026

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW1

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

Schedule 1 ~~3~~ Plan Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-



(1) LEEDS BRADFORD AIRPORT LIMITED

AND THREE OTHERS

Claimants

- v -

KB-2024-002317

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex-parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the first witness statements: of Alexander James Wright dated 16 July 2024, 17 July 2024, (another) 17 July 2024; and 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden, Counsel for the Claimants and no one attending for the Defendants.

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

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to protestrequest@lba.co.uk.

DEFINITIONS

"**Leeds Bradford Airport**" means the land shown in red outlined in red on Plan 1 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

https://www.leedsbradfordairport.co.uk/injunction. at which copies of this Order may be viewed and downloaded).

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the First Defendant:

    a. Uploading a copy onto the following website: https://www.leedsbradfordairport.co.uk/injunction.

    b. Sending an email to each of the email addresses listed in Schedule 3 to this Order (1) stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and (2) attaching this Order.

    c. Affixing a notice at those locations marked with an "X" on Plan 1 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form of Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraph 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.

6. The Court will provide sealed copies of this Order to the First Claimant's solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3 and 4. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the First Defendant of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone 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 First Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.

13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE FIRST CLAIMANT

The First Claimant's solicitors and their contact details are:

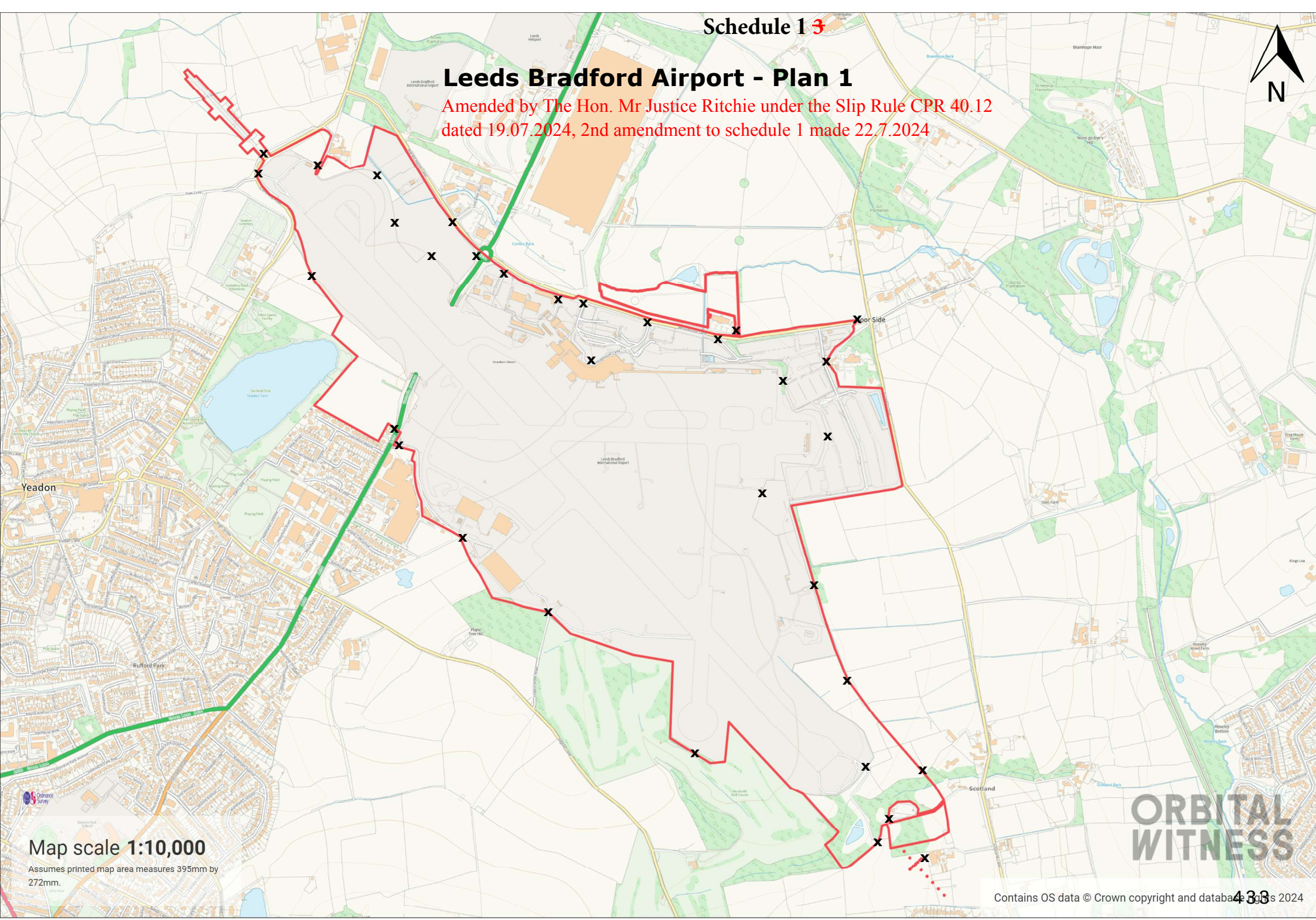
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

Leeds Bradford Airport - Plan 1

Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12
dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant will take steps to serve the First Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The First Claimant 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Leeds Bradford Airport Limited (the "**First Claimant**")

This notice relates to the land known as Leeds Bradford Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

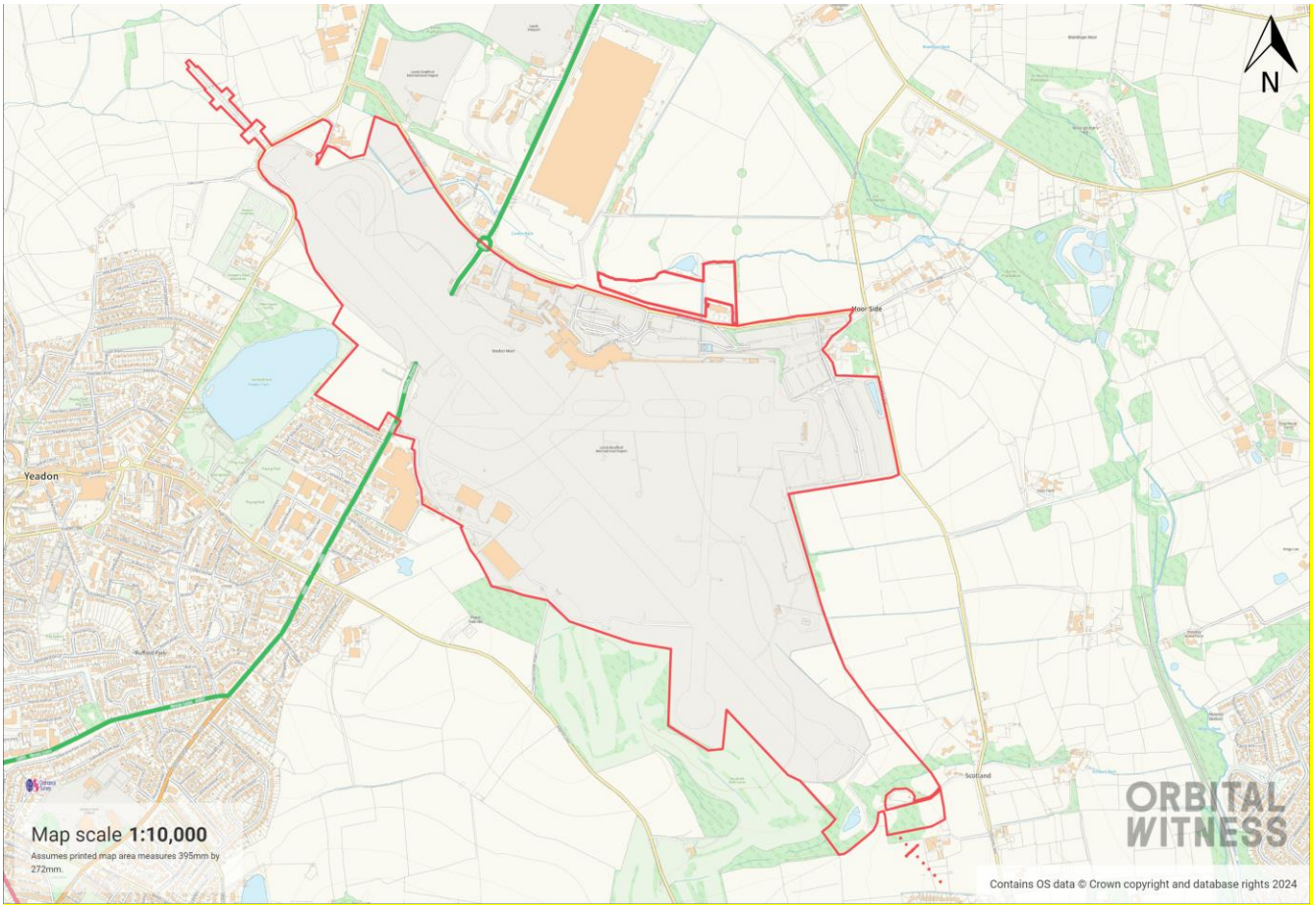
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: https://www.leedsbradfordairport.co.uk/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.


N
Yeadon
Moor Side
Scotland
Map scale 1:10,000
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

AND THREE OTHERS

Claimants



- v -

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 19 July 2024.

UPON the Claimants' claim by the Claim Form issued on 16 July 2024.

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, dated 17 July 2024, (and another) 17 July 2024 and dated 18 July 2024; Vincent Hodder dated 15 July 2024; Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants.

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

AND UPON the Second Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London Luton Airport, as defined by this Order, should be made by email to protestrequest@ltn.aero.

DEFINITIONS

"**London Luton Airport**" means the land shown in red outlined in red on Plan 2 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.london-luton.co.uk/corporate/lla-publications/injunction at which copies of this Order may be viewed and downloaded.

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of London Luton Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.

2. This Order is subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Second Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the Second Defendant:

    a. Uploading a copy onto the following website: https://www.london-luton.co.uk/corporate/lla-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 and attaching this Order.

    c. Affixing a notice at those locations marked with an "X" on Plan 2 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the Second Defendant and each of them.

6. The Court will provide sealed copies of this Order to the Second Claimant's solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the Second Defendant of any further applications or documents in the proceedings by the Second Claimant shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone 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 Second Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Second Claimant's solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second Claimant's solicitors.

13. The Second Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE SECOND CLAIMANT

The Second Claimant's solicitors and their contact details are:

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

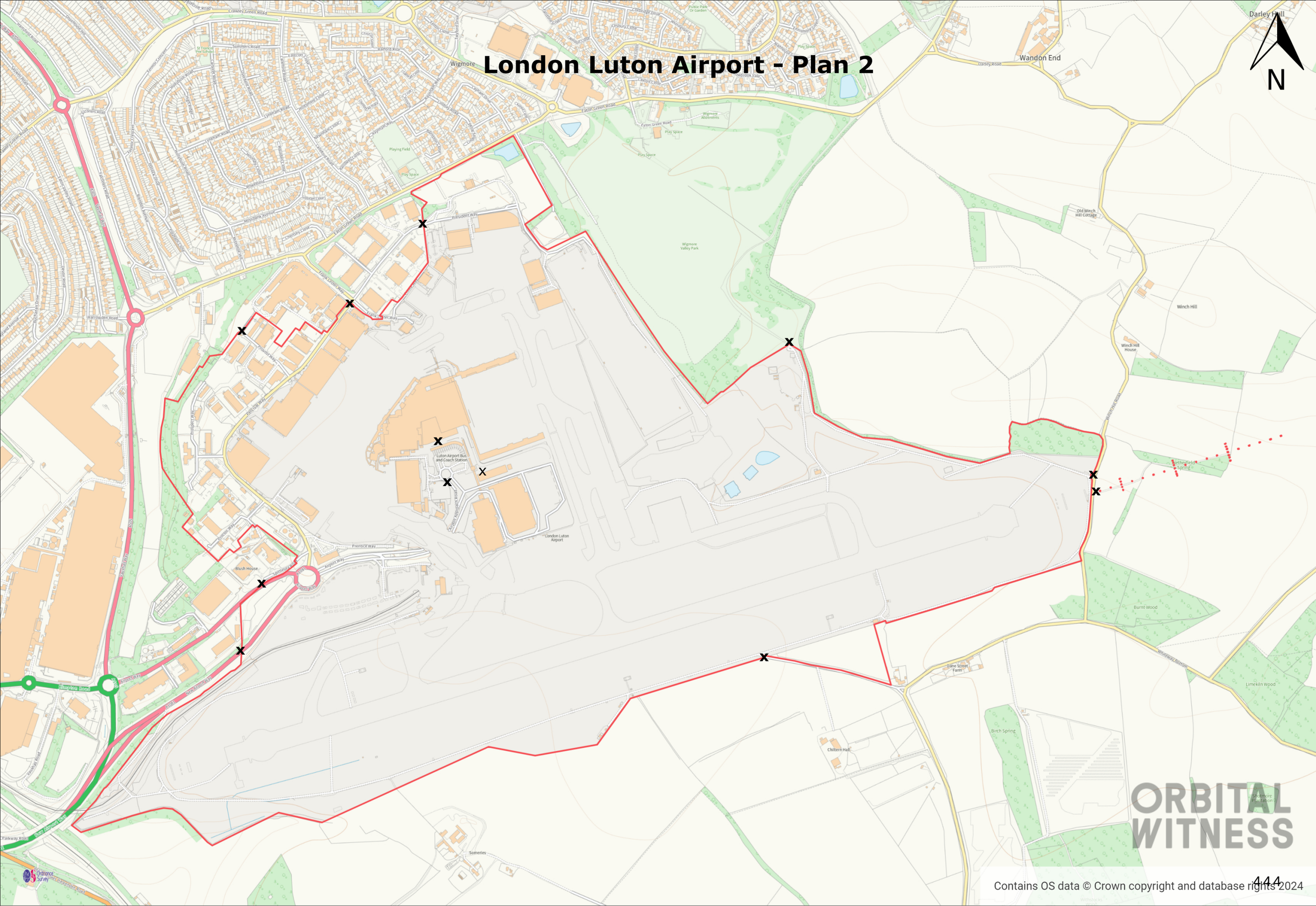
07712 881 393

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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

London Luton Airport - Plan 2



ORBITAL WITNESS

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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND CLAIMANT

(1) The Second Claimant will take steps to serve the Second Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The Second Claimant 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: London Luton Airport Operations Limited (the "**Second Claimant**")

This notice relates to the land known as London Luton Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.

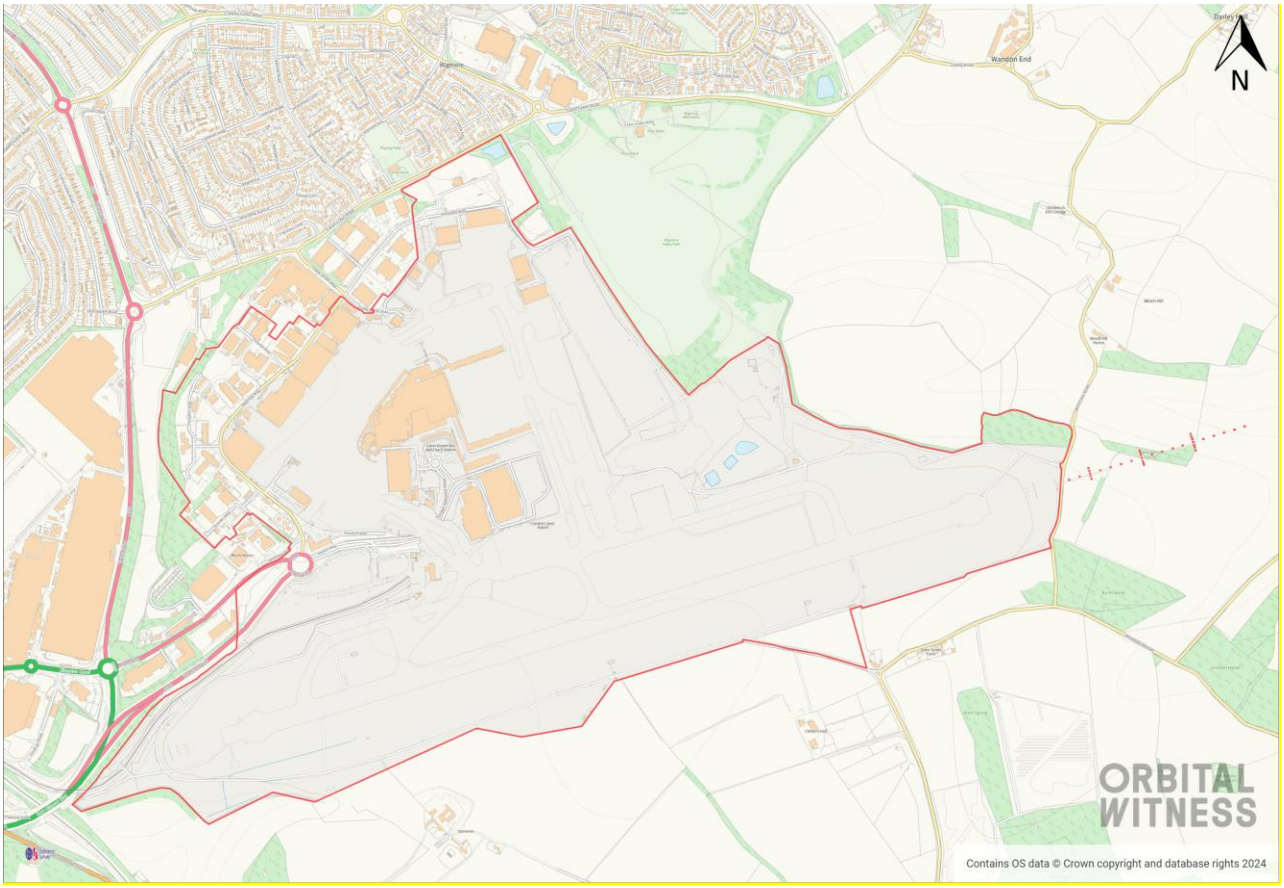
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Second Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: https://www.london-luton.co.uk/corporate/lla-publications/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.


N
ORBITAL WITNESS
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CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-



(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

AND TWO OTHERS

Claimants

- v -

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE The Honourable Mr Justice Ritchie on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, 17 July 2024, (and another) 17 July 2024, dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants

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

AND UPON the Third and Fourth Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Newcastle International Airport, as defined by this Order, should be made by email to protestrequest@newcastleinternational.co.uk

DEFINITIONS

"**Newcastle International Airport**" means the land shown in red outlined in red on Plan 3 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.newcastleairport.com/about-your-airport/airport-company/injunction/ at which copies of this Order may be viewed and downloaded).

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Newcastle International Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants (or either of them).

2. This Order is subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Third and Fourth Claimants shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the Third Defendant:

    a. Uploading a copy onto the following website: https://www.newcastleairport.com/about-your-airport/airport-company/injunction/

    b. Sending an email with this Order attached 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. Affixing a notice at those locations marked with an "X" on Plan 3 setting out where these documents can be found and obtained in hard copy in the form of Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraph 3 shall be good and sufficient service of this Order and of the Claim Documents upon the Third Defendant and each of them.

6. The Court will provide sealed copies of this Order to the Third and Fourth Claimants' solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraphs 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the Third Defendant of any further applications or documents in the proceedings by the Third and Fourth Claimants shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone 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 Third and Fourth Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Third and Fourth Claimants' solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Third and Fourth Claimants' solicitors.

13. The Third and Fourth Claimants (or either of them) have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19.7.2024

COMMUNICATIONS WITH THE THIRD AND FOURTH CLAIMANTS

The Third and Fourth 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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Newcastle International Airport - Plan 3



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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE THIRD AND FOURTH CLAIMANTS

(1) The Third and Fourth Claimants will take steps to serve the Third Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The Third and Fourth 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Newcastle International Airport Limited and NIAL Services Limited (the "**Third and Fourth Claimants**")

This notice relates to the land known as Newcastle International Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants.

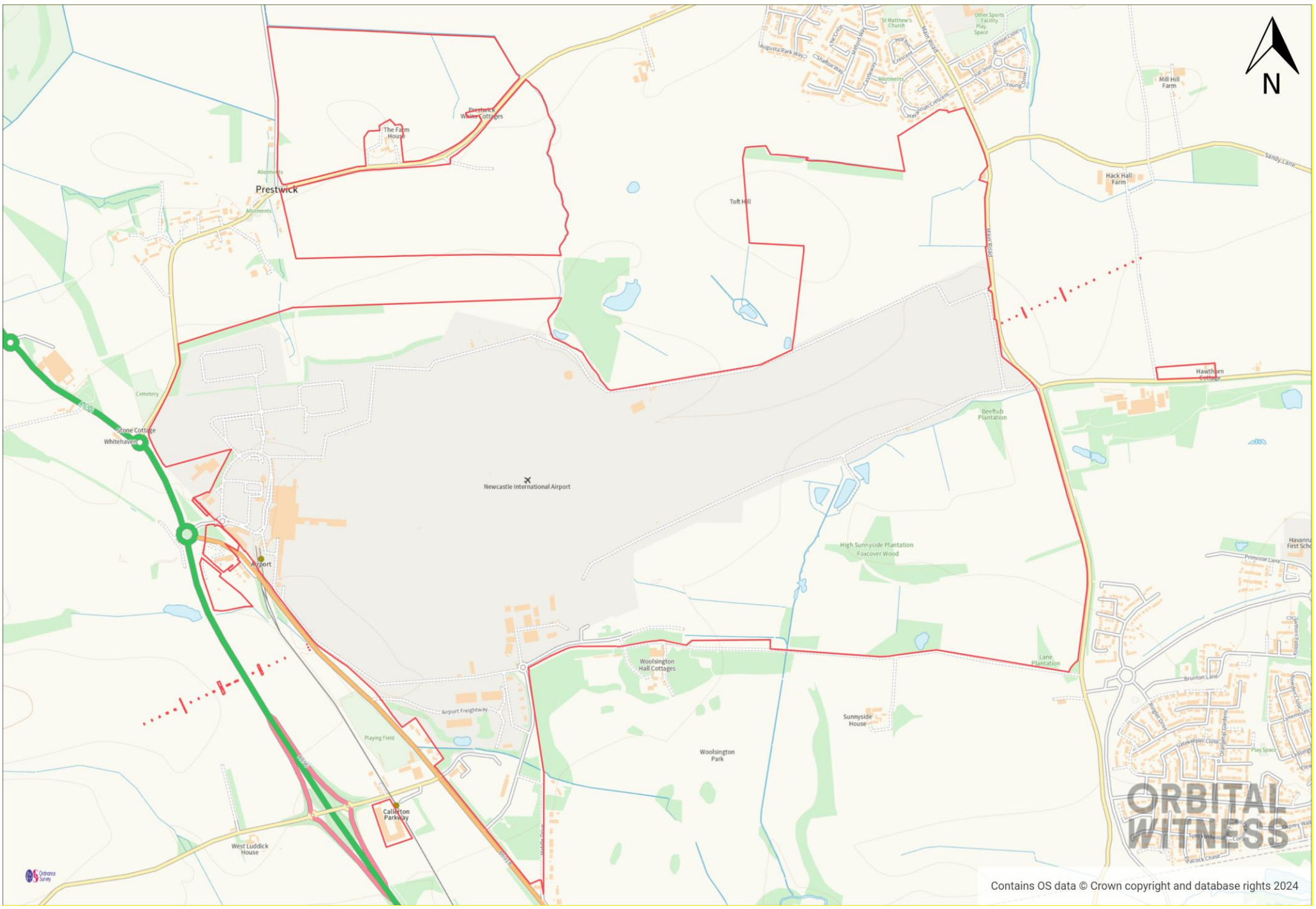
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Third and Fourth Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at:
https://www.newcastleairport.com/about-your-airport/airport-company/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



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

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

KB-2024-001765

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

Plan 1

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

X Notice locations

N

Map scale **1:5,650**

Assumes printed map area measures 395mm by 272mm.

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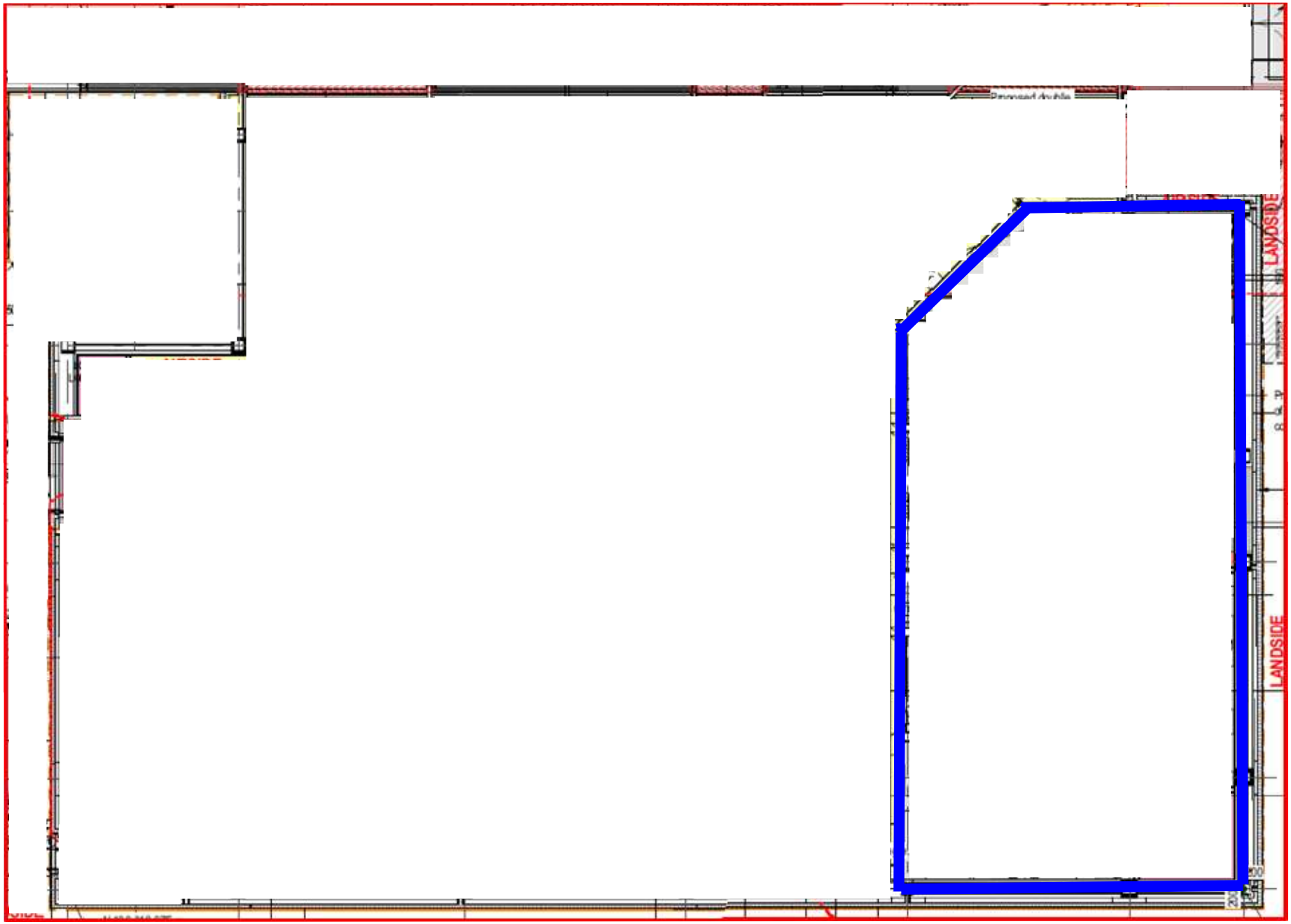
Main Terminal - Ground Floor

Plan 2



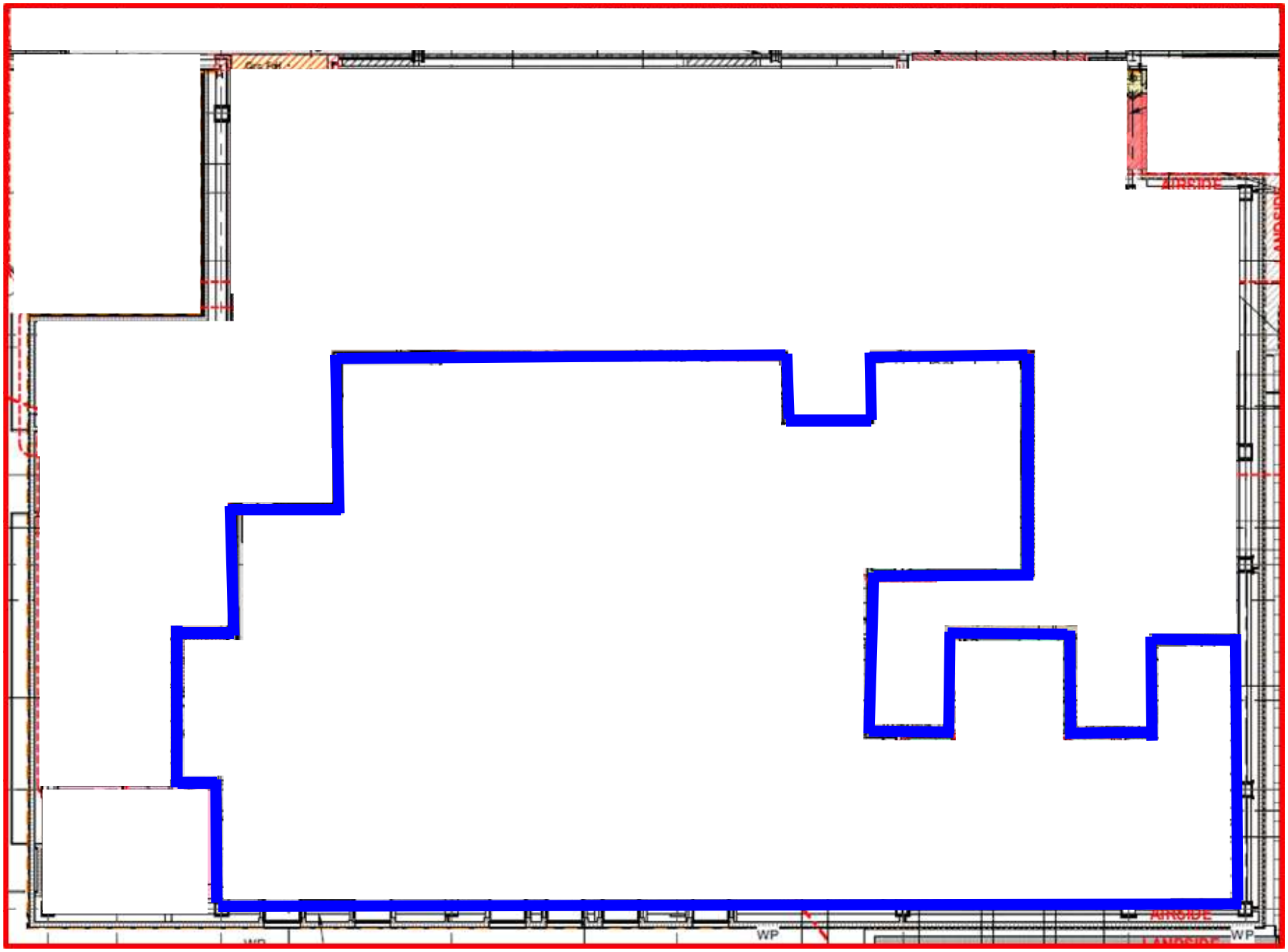
Terminal Immigration Facilities - Ground Floor

Plan 3



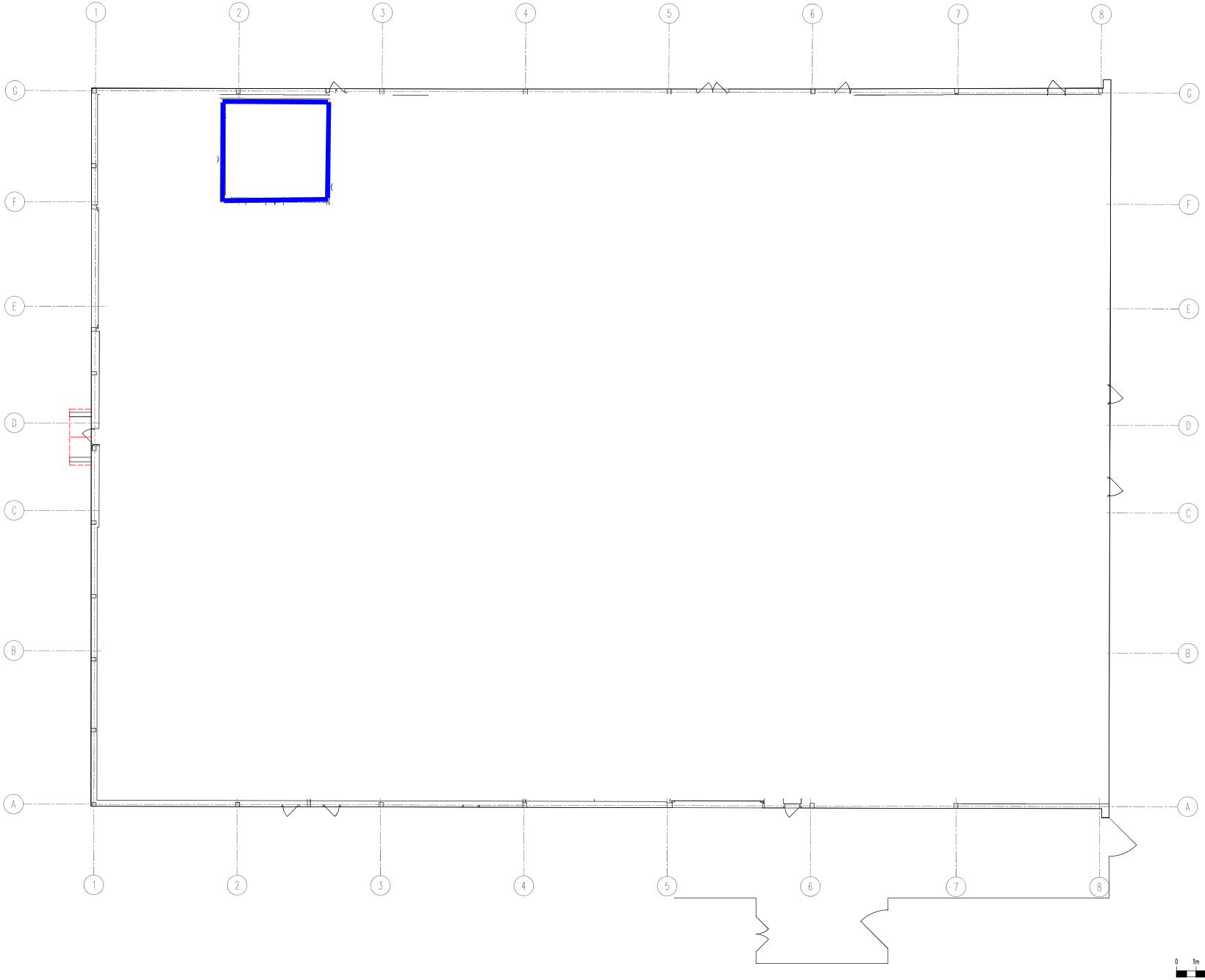
Terminal Immigration Facilities - First Floor

Plan 4



Blue Shed - Ground Floor

Plan 5



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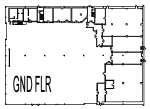
SCALE BAR 1:100 @ A1

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:

Rev	Change	Date
B	Room Numbers Added	01/11/18
A	Door Numbers Added	01/03/16



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

RECORD DRAWING

Title
BLUE SHED

Drawing Title
Ground Floor
General Arrangement Plan

Date	Drn By	Chk By	Appd
04/08/15	VR	-	-

Drawing Number: RAS/G/A/001

Rev: B

Scale: 1:100

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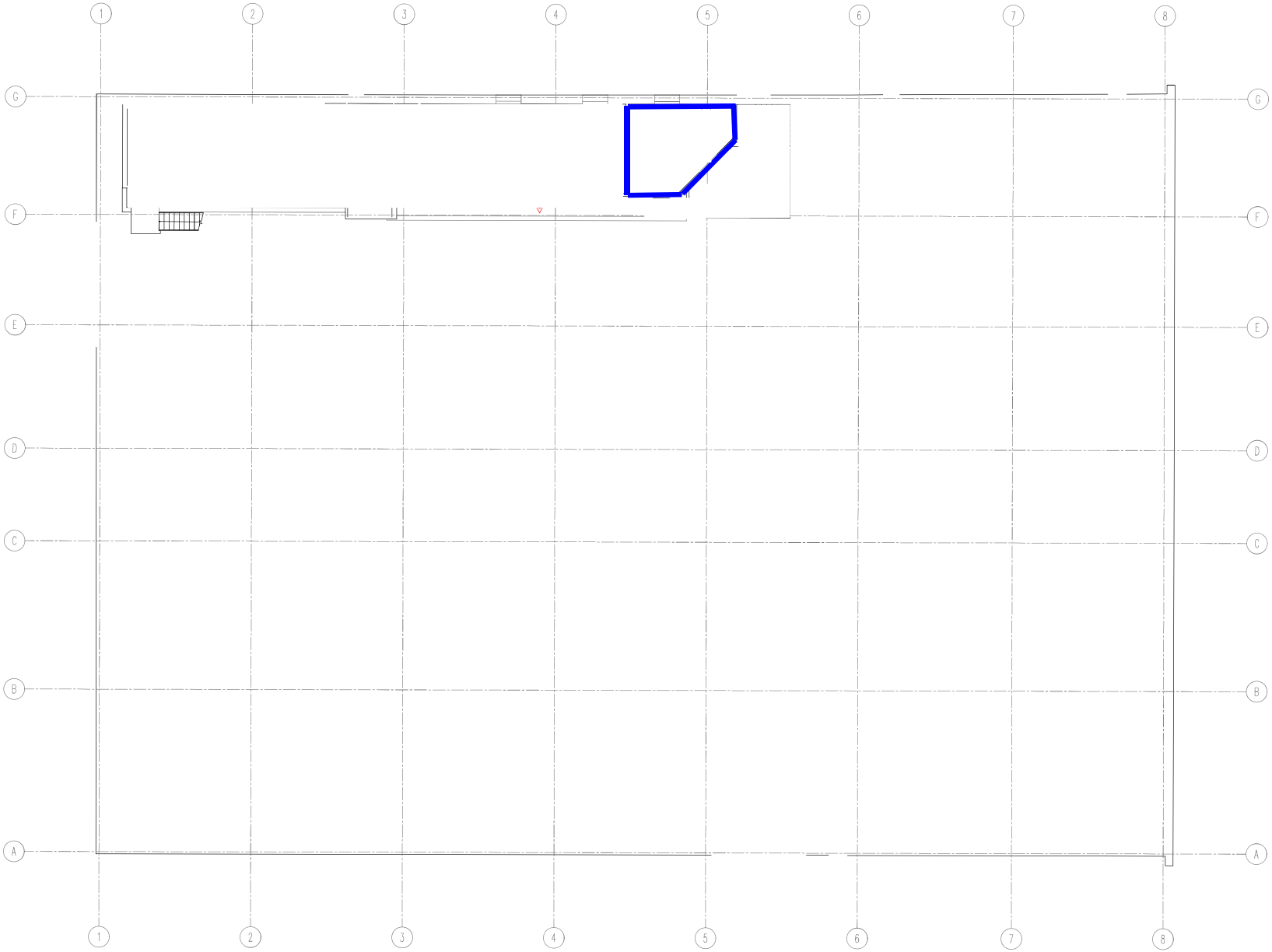
A1

Printed on: November 1, 2018 - 1:23PM C:\Users\Cartabriel\Documents\Cartabriel\LONDON CITY AIRPORT\Record Drawings\Blue Shed\Ground Floor\R_RS_G_GROUND FLOOR COORDINATED Rev B.dwg

Blue Shed - First Floor

Plan 6



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SCALE BAR 1:100 @ A1

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:

LEGEND

X/XXX FIRE DOOR

X/XXX STANDARD DOOR

Rev	Change	Date
B	Room Numbers Added	01/11/18
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

Title
BLUE SHED

Drawing Title
First Floor
General Arrangement

Date	Dn By	Ck By	Appd
04/08/15	VR	-	-

Drawing Number: RAS7/A1001 Rev: B

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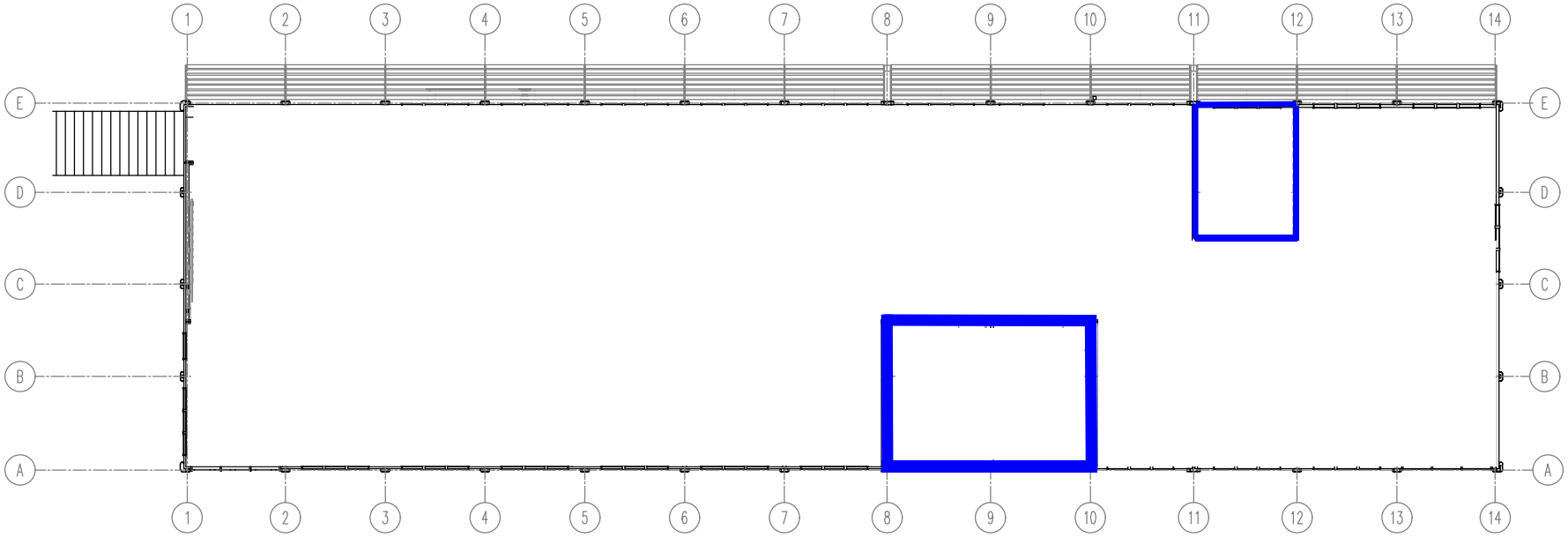
Scale: 1:100

A1

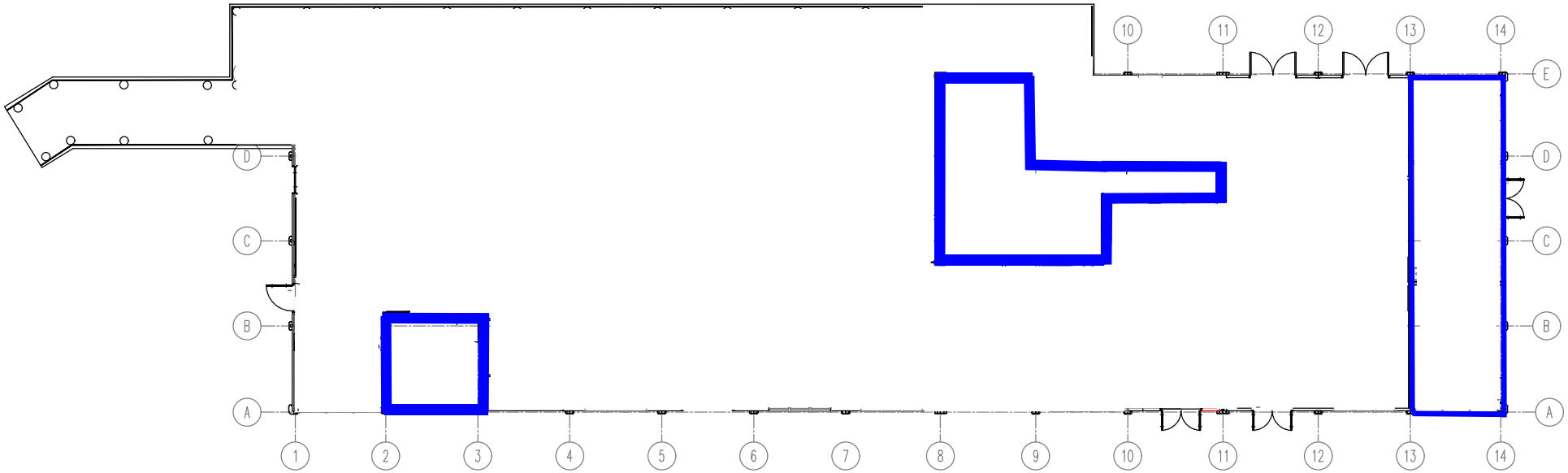
Printed on: November 1, 2018 - 1:34PM C:\Users\Cartabrien\Documents\CartaBrien\LONDON CITY AIRPORT\Record Drawings\Blue Shed\1st FloorR_BS_1_A_FIRST FLOOR COORDINATED Rev A.dwg

Plan 7

Jet Centre - Ground Floor



Jet Centre - First Floor



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SCALE BAR 1:75 @ A1

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:

LEGEND

X/XXX Fire Door

X/XXX Standard Door

Rev	Change	Date
E	Room Numbers Added	16/08/18
D	Layout amended	19/04/18
C	04/04/18	04/03/16
B	Door Numbers Added	04/03/16
A	Modified as indicated	12/06/15

G-1 FLRS

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

RECORD DRAWING

Title
JET CENTRE

Drawing Title
Ground to First Floor
General Arrangement Plan

Date	Drn By	Chk By	Appvd
24/07/15	VR	-	-

Drawing Number R/JC/A/A/001 Rev E

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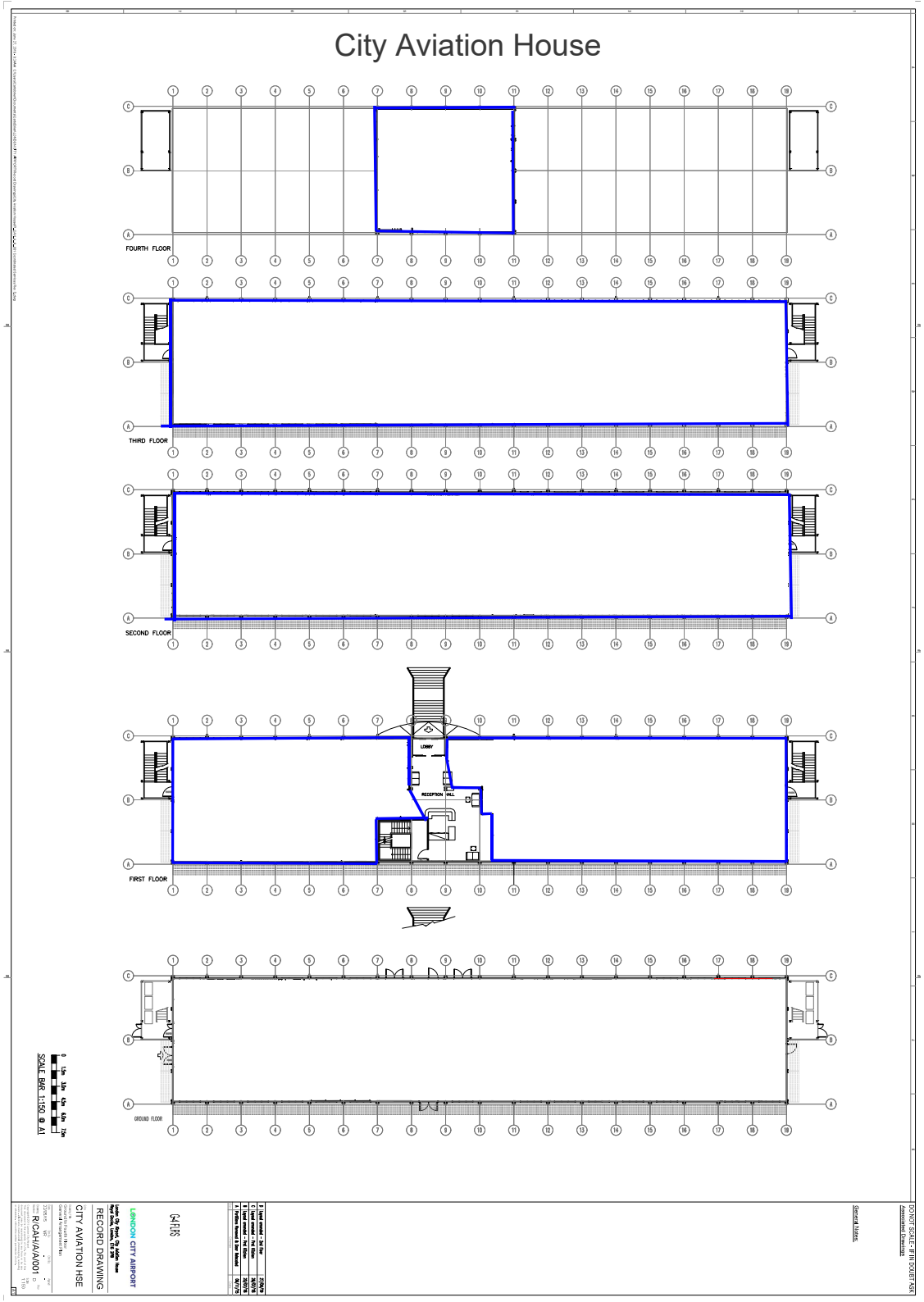
Scale 1:75 @ A1

Printed on: August 18, 2016 - 11:14AM C:\Users\CartoBrien\Documents\CartoBrien\LONDON CITY AIRPORT\Record Drawings\Jet Centre\R_JC_A_A_001 Coordinated Services Rev D.dwg

Plan


City Aviation House
FOURTH FLOOR
THIRD FLOOR
SECOND FLOOR
LOBBY
RECEPTION WALL
FIRST FLOOR
GROUND FLOOR
SCALE BAR 1:150 @ A1
CITY AVIATION HSE
RECORD DRAWING
LONDON CITY AIRPORT
DO NOT SCALE - IF IN DOUBT ASK
Standard Notes
Associated Drawings

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

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-



(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it 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 the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON HEARING Leading and Junior Counsel for the Claimants

AND UPON each of the First, Second and Third Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

IT IS ORDERED THAT:

DEFINITIONS

1. "**Manchester Airport**" means the land shown outlined in red on Plan 1 to the Claim Form (including the highways therein), appended to this Order in Schedule 1 ("**Plan 1**").

2. "**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (https://www.manchesterairport.co.uk/injunction/) at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the First Defendants and each of them are forbidden from doing the following:

    a. Entering, occupying or remaining on any part of Manchester Airport without the consent of the First, Second and Third Claimants (or any of them);

    b. Affixing themselves to any other person or object on Manchester Airport;

    c. Impeding access to or enjoyment of Manchester Airport by the First, Second and Third Claimants (or any of them) and those authorised by the First, Second and Third Claimants (or any of them), whether by blocking any entrance or otherwise;

    d. Blocking or obstructing the free and safe passage of traffic onto or along or across the highways within Manchester Airport;

    e. Refusing to leave the aforesaid parts of the highways when asked to do so by a police constable, when contravening any of paragraphs 3(b) and/or (d);

    f. Continuing to do any act prohibited by paragraphs 3(a) to (e) above.

4. This Order is subject to periodic review by the Court on application by the First, Second and Third Claimants at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First, Second and Third Claimants shall take the following steps by way of service of copies of the amended

Claim Form, amended Particulars of Claim, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") upon the First Defendants:

a. Uploading a copy onto the following website: https://www.manchesterairport.co.uk/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. 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.

6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the First Defendants by the First, Second and Third Claimants carrying out each of the following steps:

a. Uploading a copy of the Order onto the following website: https://www.manchesterairport.co.uk/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.

7. The taking of such steps set out at paragraph 5 and 6 shall been good and sufficient service of this Order and of the Claim Documents upon the First Defendants and each of them.

8. The Court will provide sealed copies of this Order to the First, Second and Third Claimants' solicitors for service (whose details are set out below).

9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

10. Service on the First Defendants of any further applications or documents in the proceedings by the First, Second and Third Claimants (or any of them) shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).

11. Anyone 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 First, Second and Third Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com . If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the First, Second and Third Claimants' solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

13. The First, Second and Third Claimants (or any of them) have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FIRST, SECOND AND THIRD CLAIMANTS

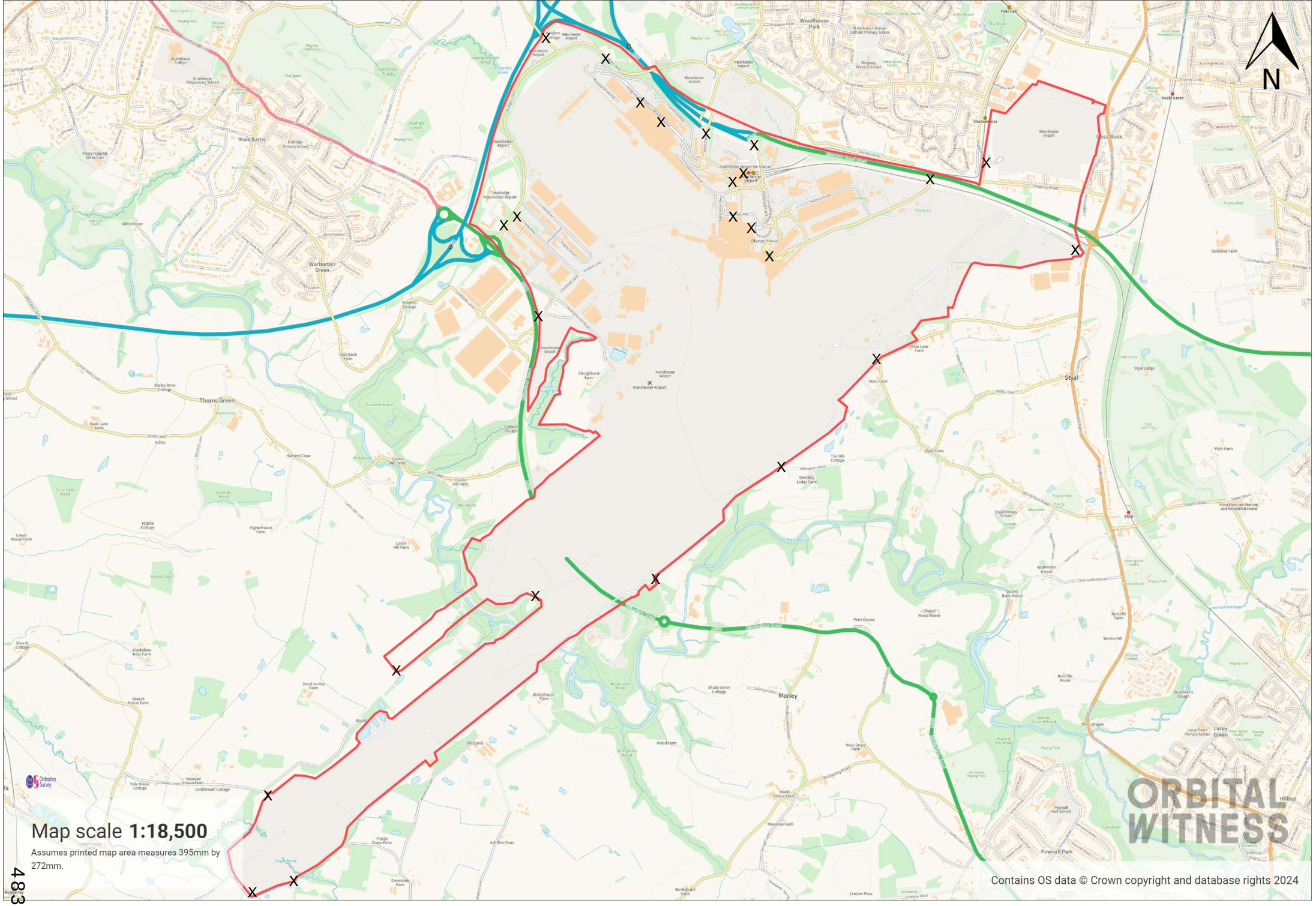
16. The First, Second and Third Claimants' solicitors and their contact details are:

(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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1


N
Map scale 1:18,500
Assumes printed map area measures 395mm by 272mm.
Contains OS data © Crown copyright and database rights 2024
ORBITAL WITNESS

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST, SECOND AND THIRD

(1) The First, Second and Third Claimants will take steps to serve the First Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.

(2) The First, Second and Third 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 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

TO: Persons Unknown whose purpose is or includes protest on the premises at Manchester Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

FROM: Manchester Airport Plc, Airport City (Manchester) Ltd, and Manchester Airport Car Park (1) Limited ("the **First, Second and Third Claimants**")

This notice relates to the land known as Manchester Airport, Manchester, M90 1QX which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the First, Second, and Third Claimants

2. Affixing themselves to any other person or object on the Airport.

3. Impeding access to or enjoyment of the Airport by the First, Second and Third Claimants or those authorised by the First, Second, and Third Claimants, whether by blocking access to any entrance or otherwise.

4. Blocking or obstructing the free and safe passage of traffic onto or along or across those parts of the highway show the red line outlined on the Plan;

5. Refusing to leave the parts of the highways on the Plan when asked to do so by a police constable, when contravening any paragraph 1 and/or 4.

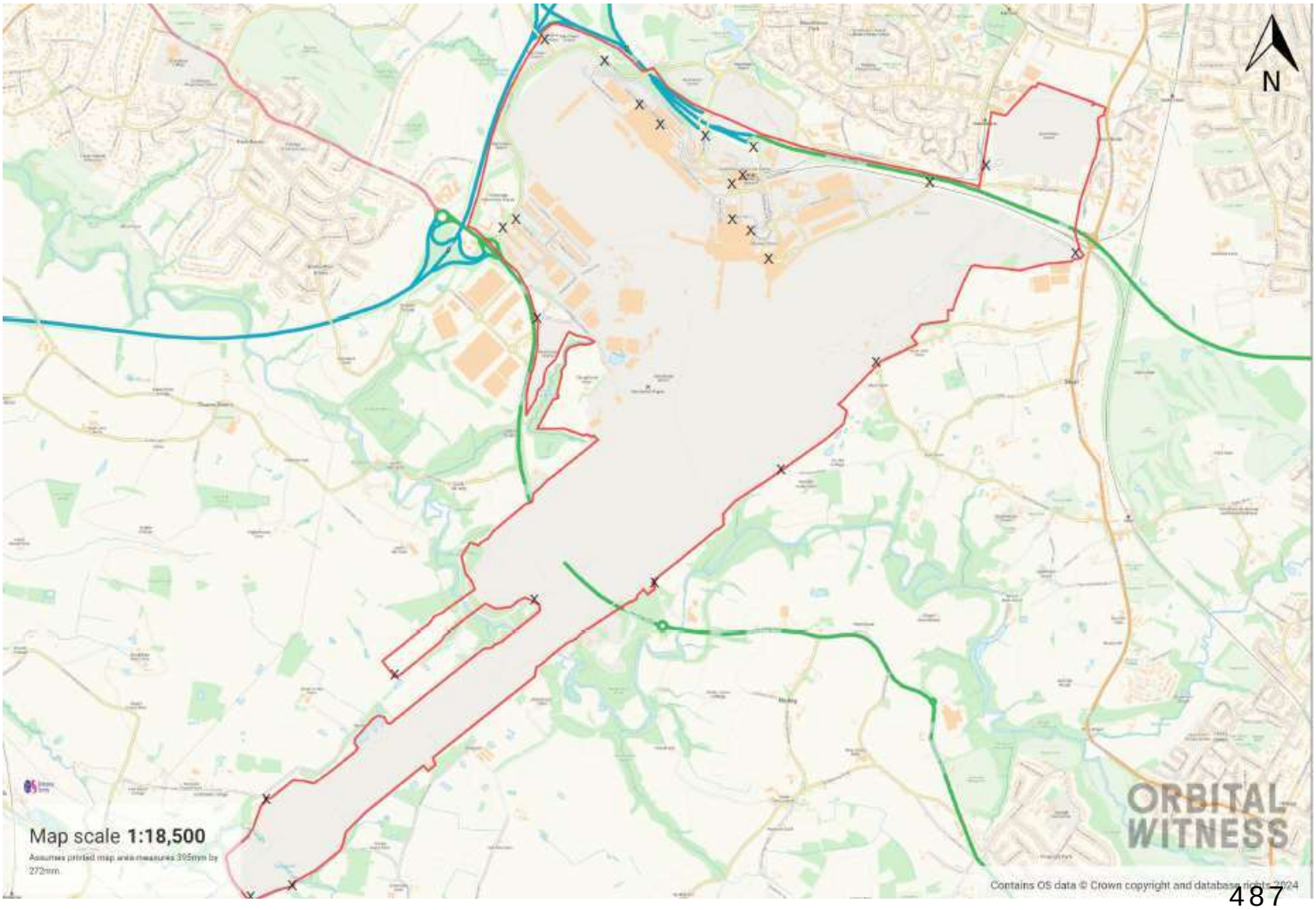
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First, Second and Third Claimants solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: https://www.manchesterairport.co.uk/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email: StuartWortley@eversheds-sutherland.com



CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

HIGH COURT OF JUSTICE
08 Jul 2024
QUEEN'S BENCH DIVISION
KB-2024-002132

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it 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 the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

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

IT IS ORDERED THAT:

DEFINITIONS

1. "**Stansted Airport**" means the land shown in red outlined in red on Plan 2 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

2. "**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (https://www.stanstedairport.com/injunction/) at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the Second Defendants and each of them are forbidden from doing the following:

    a. Entering, occupying or remaining on any part of Stansted Airport without the consent of the Fourth Claimant;

    b. Affixing themselves to any other person or object on Stansted Airport;

    c. Impeding access to or enjoyment of Stansted Airport by the Fourth Claimant and those authorised by the Fourth Claimant, whether by blocking any entrance or otherwise;

    d. Continuing to do any act prohibited by paragraphs 3(a) to (c) above.

4. This Order is subject to periodic review by the Court on application by the Fourth Claimant at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Fourth Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") upon the Second Defendants:

    a. Uploading a copy onto the following website: https://www.stanstedairport.com/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. Affixing a notice at those locations marked with an "X" on Plan 2 setting out where these documents can be found and obtained in hard copy.

6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the Defendants by the Claimant carrying out each of the following steps:

a. Uploading a copy of the Order onto the following website: https://www.stanstedairport.com/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 2.

d. Affixing Warning Notices of A2 size at those locations marked with an "X" on Plan 2.

7. The taking of such steps set out at paragraph 5 and 6 shall been good and sufficient service of this Order and of the Claim Documents upon the Second Defendants and each of them.

8. The Court will provide sealed copies of this Order to the Fourth Claimant's solicitors for service (whose details are set out below).

9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

10. Service on the Second Defendants of any further applications or documents in the proceedings by the Fourth Claimant shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).

11. Anyone 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 Fourth Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Fourth Claimant's solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

13. The Fourth Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FOURTH CLAIMANT

16. The Fourth Claimant's solicitors and their contact details are:

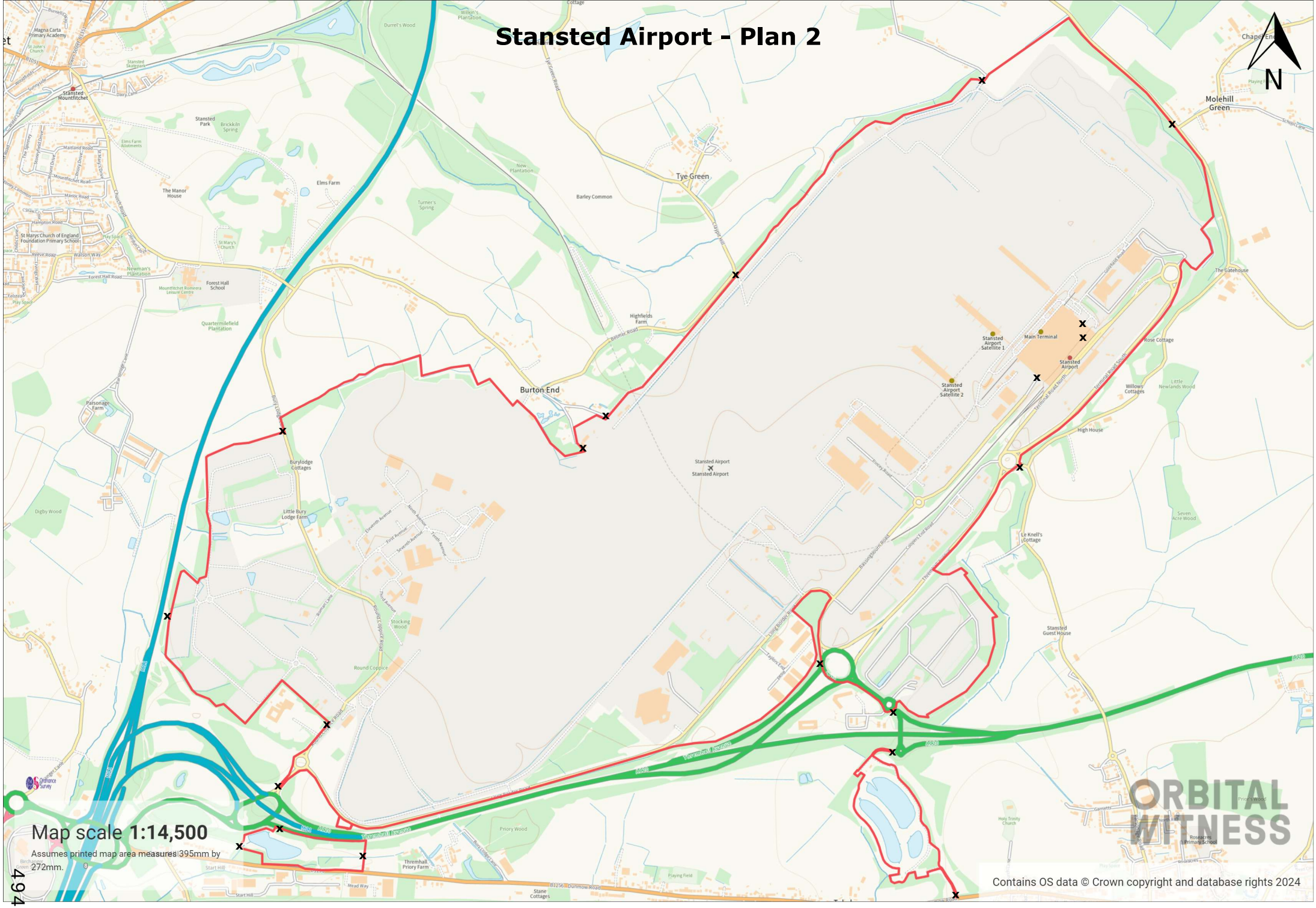
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Stansted Airport - Plan 2



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FOURTH CLAIMANT

(1) The Fourth Claimant will take steps to serve the Second Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.

(2) The Fourth Claimant 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 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

TO: Persons Unknown whose purpose is or includes protest on the premises at Stansted Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

FROM: Stansted Airport Ltd ("the **Fourth Claimant**")

This notice relates to the land known as Stansted Airport, Stansted, CM24 1QW which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the Fourth Claimant

2. Affixing themselves to any other person or object on the Airport.

3. Impeding access to or enjoyment of the Airport by the Fourth Claimant or those authorised by the Fourth Claimant, whether by blocking access to any entrance or otherwise.

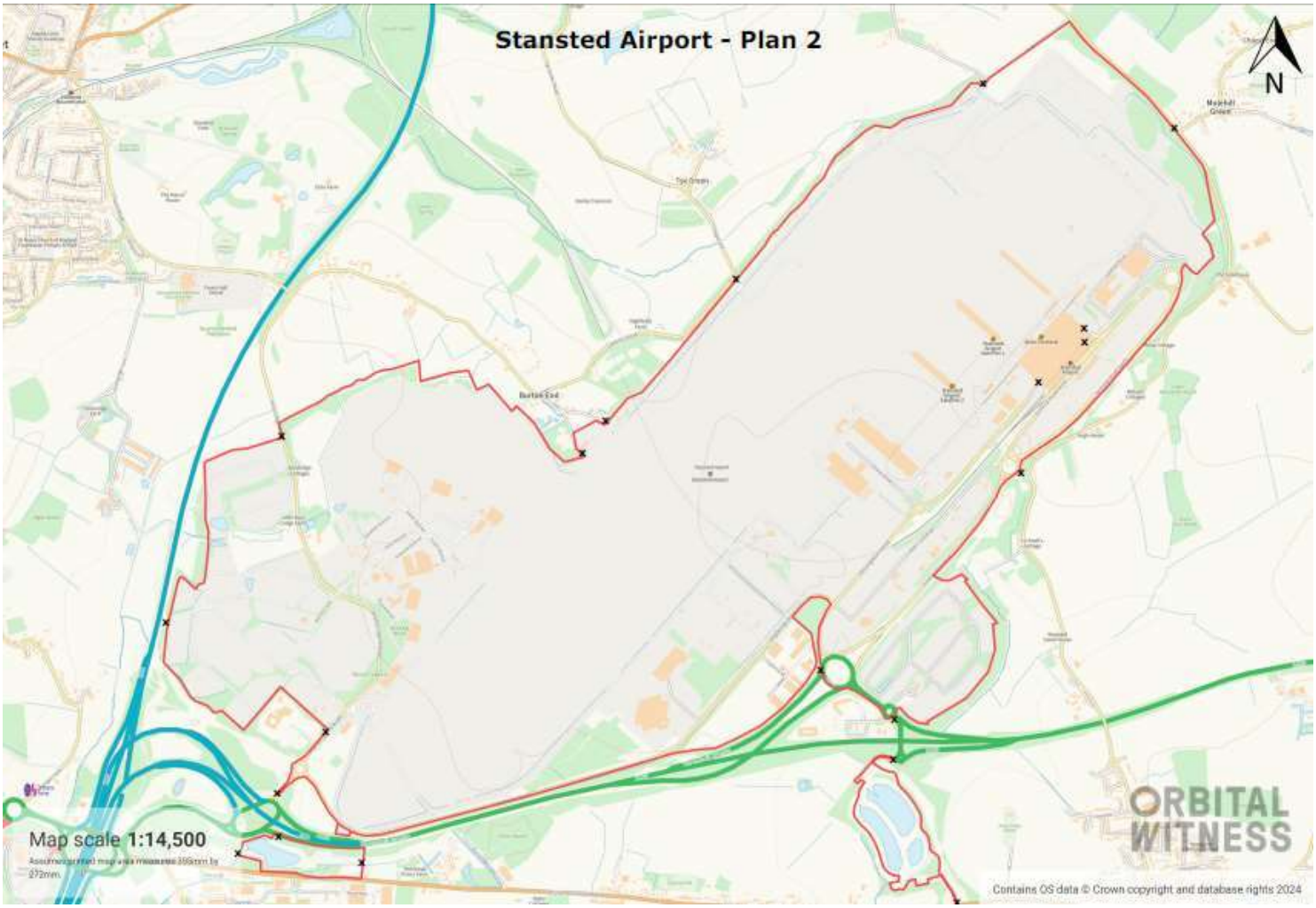
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fourth Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: https://www.stanstedairport.com/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-



(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) **PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it 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 the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

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

IT IS ORDERED THAT:

DEFINITIONS

1. "**East Midlands Airport**" means the land shown in red outlined in red on Plan 3 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

2. "**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (https://www.eastmidlandsairport.com/injunction/) at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the Third Defendants and each of them are forbidden from doing the following:

    a. Entering, occupying or remaining on any part of East Midlands Airport without the consent of the Fifth Claimant;

    b. Affixing themselves to any other person or object on East Midlands Airport;

    c. Impeding access to or enjoyment of East Midlands Airport by the Fifth Claimant and those authorised by the Fifth Claimant, whether by blocking any entrance or otherwise;

    d. Continuing to do any act prohibited by paragraphs 3(a) to (c) above.

4. This Order is subject to periodic review by the Court on application by the Fifth Claimant at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Fifth Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") upon the Third Defendants:

    a. Uploading a copy onto the following website: https://www.eastmidlandsairport.com/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. Affixing a notice at those locations marked with an "X" on Plan 3 setting out where these documents can be found and obtained in hard copy.

6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the Third Defendants by the Fifth Claimant carrying out each of the following steps:

a. Uploading a copy of the Order onto the following website: https://www.eastmidlandsairport.com/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 3.

d. Affixing Warning Notices of A2 size at those locations marked with an "X" on Plan 3.

7. The taking of such steps set out at paragraph 5 and 6 shall been good and sufficient service of this Order and of the Claim Documents upon the Third Defendants and each of them.

8. The Court will provide sealed copies of this Order to the Fifth Claimant's solicitors for service (whose details are set out below).

9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

10. Service on the Third Defendants of any further applications or documents in the proceedings by the Fifth Claimant shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).

11. Anyone 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 Fifth Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Fifth Claimant's solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

13. The Fifth Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FIFTH CLAIMANT

16. The Fifth Claimant's solicitors and their contact details are:

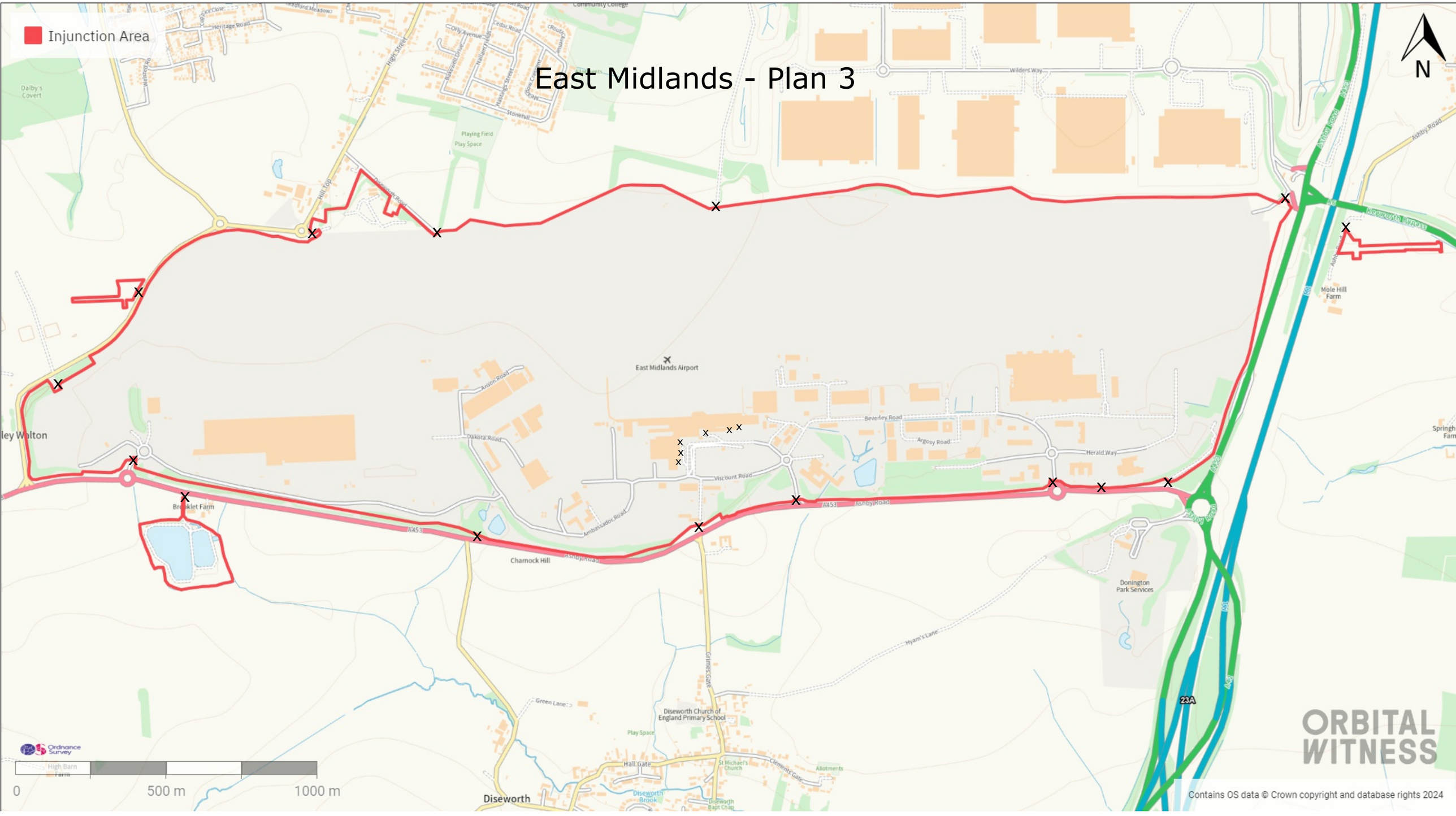
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

East Midlands - Plan 3



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIFTH CLAIMANT

(1) The Fifth Claimant will take steps to serve the Third Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.

(2) The Fifth Claimant 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 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

HIGH COURT CLAIM NO: KB-2024-002132

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

TO: Persons Unknown whose purpose is or includes protest on the premises at East Midlands International Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

FROM: East Midlands International Airport Ltd ("the **Fifth Claimant**")

This notice relates to the land known as East Midlands International Airport, Castle Donnington, Derby, DE74 2SA which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the Fifth Claimant

2. Affixing themselves to any other person or object on the Airport.

3. Impeding access to or enjoyment of the Airport by the Fifth Claimant or those authorised by the Fifth Claimant, whether by. blocking access to any entrance or otherwise.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fifth Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: https://www.eastmidlandsairport.com/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(1) BIRMINGHAM AIRPORT LIMITED
AND FIVE OTHERS

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
06 Aug 2024
KB-2024-002473

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).

BEFORE THE HONOURABLE MR JUSTICE JACOBS

ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

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

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Birmingham Airport, as defined by this Order, should be made by email to protestrequest@birminghamairport.co.uk

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Birmingham Airport**" means the land outlined in red on Plan 1 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Birmingham Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.Birminghamairport.co.uk/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. Affixing a Warning Notice approximately at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.Birminghamairport.co.uk/injunction.

9. The Court will provide sealed copies of this Order to the First Claimant's solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone 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 First Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.

13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FIRST CLAIMANT

16. The First Claimant's solicitors and their contact details are:

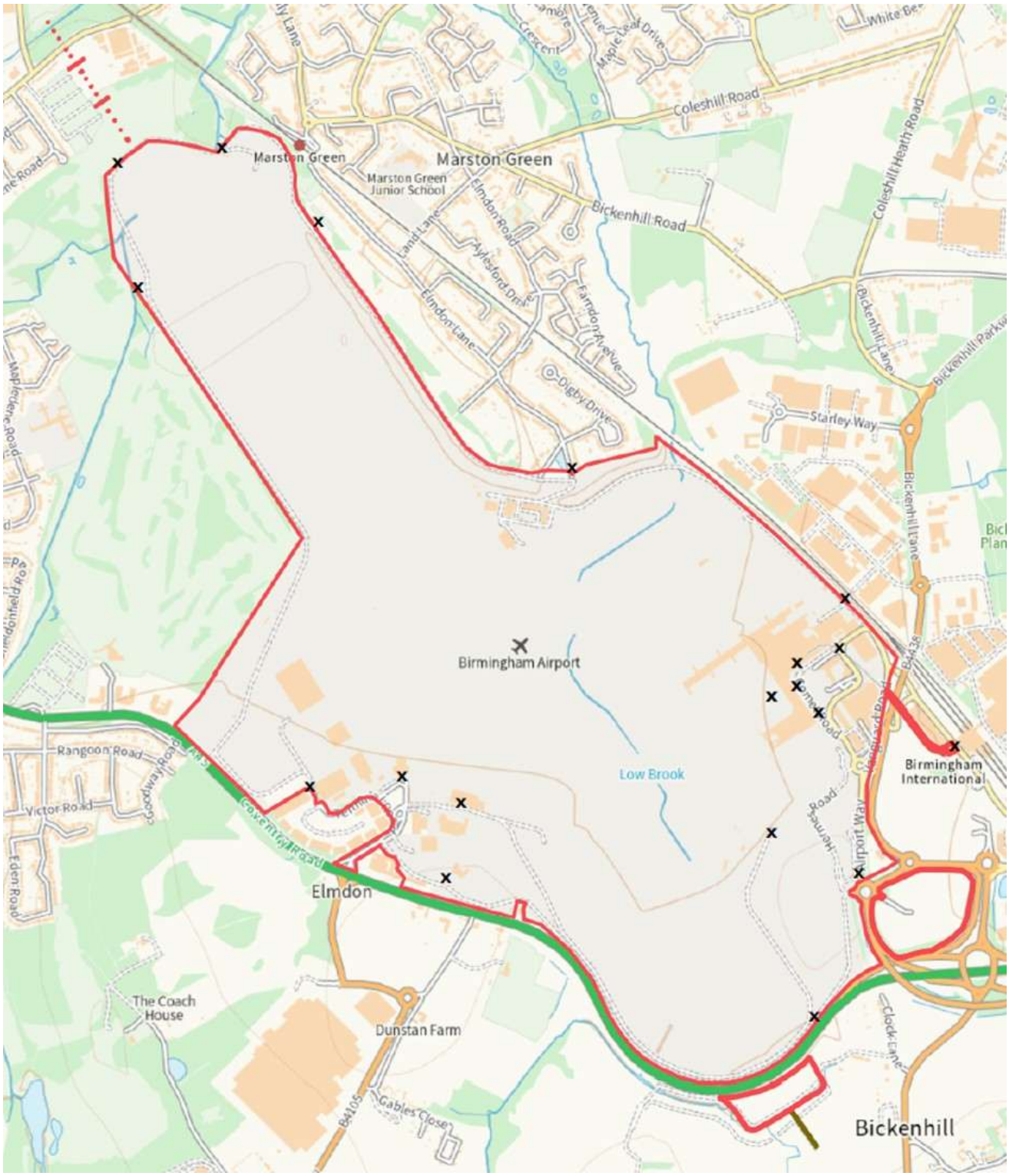
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Marston Green
Marston Green
Marston Green Junior School
Coleshill Road
Bickenhill Road
Elmdon Road
Sand Lane
Aylesford Drive
Elmdon Lane
Farndon Avenue
Digby Drive
Coleshill Heath Road
Bickenhill Lane
Starley Way
Birmingham Airport
Low Brook
Rangoon Road
Victor Road
Goodway Road
Eden Road
Elmdon
The Coach House
Dunstan Farm
Gables Close
B4105
Birmingham International
Bickenhill

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Birmingham Airport Limited (the "**First Claimant**")

This notice relates to the land known as Birmingham Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

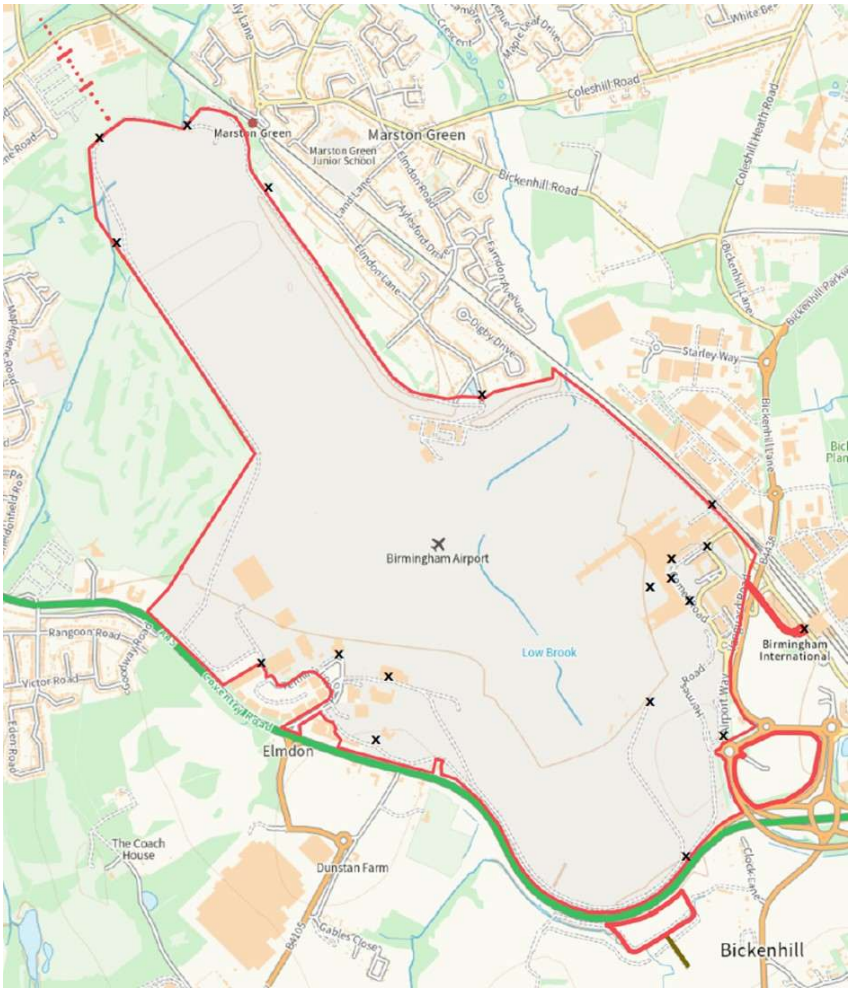
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at: https://www.Birminghamairport.co.uk/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED

AND FOUR OTHERS

Claimants

- v -

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
06 Aug 2024
KB-2024-002473

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).

BEFORE THE HONOURABLE MR JUSTICE JACOBS

ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

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

AND UPON the Second and Third Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Liverpool Airport, as defined by this Order, should be made by email to protestrequest@liverpoolairport.com

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Liverpool Airport**" means the land outlined in red on Plan 2 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of Liverpool Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second and Third Claimants.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.liverpoolairport.com/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. Affixing a Warning Notice approximately at those locations marked with an "X" on Plan 2 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.liverpoolairport.com/injunction.

9. The Court will provide sealed copies of this Order to the Second and Third Claimants' solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone 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 Second and Third Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Second and Third Claimants' solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second and Third Claimants' solicitors.

13. The Second and Third Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE SECOND AND THIRD CLAIMANTS

16. The Second and Third 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

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Liverpool Airport - Plan 2
N
Map scale 1:11,000
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND AND THIRD CLAIMANTS

(1) The Second and Third 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

KB-2024-002473 High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Liverpool Airport Limited and Peel L&P Investments (North) Limited (the "**Second and Third Claimants**")

This notice relates to the land known as Liverpool Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second and Third Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Second and Third Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at: https://www.liverpoolairport.com/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

AND THREE OTHERS



Claimants

- v -

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

KB-2024-002473

AND TWO OTHERS

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).

BEFORE THE HONOURABLE MR JUSTICE JACOBS

ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

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

AND UPON the Fourth, Fifth and Sixth Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Bristol Airport, as defined by this Order, should be made by email to protestrequest@Bristolairport.com

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Bristol Airport**" means the land shown outlined in red on Plan 3 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Bristol Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Fourth, Fifth and Sixth Claimants.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.Bristolairport.com/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. Affixing a Warning Notice approximately at those locations marked with an "X" on Plan 3 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.Bristolairport.com/injunction.

9. The Court will provide sealed copies of this Order to the Fourth, Fifth and Sixth Claimants' solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone 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 Fourth, Fifth and Sixth Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Fourth, Fifth and Sixth Claimants' solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Fourth, Fifth and Sixth Claimants' solicitors.

13. The Fourth, Fifth and Sixth Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FOURTH, FIFTH AND SIXTH CLAIMANTS

16. The Fourth, Fifth and Sixth 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

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Bristol Airport - Plan 3
N
Downside
Lulsgate Bottom
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

SCHEDULE 2 – UNDERTAKINGS GIVEN BY THE FOURTH, FIFTH AND SIXTH CLAIMANTS

(1) The Fourth, Fifth and Sixth 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Bristol Airport Limited, South West Airports Limited and Bristol Developments Limited (the "**Fourth, Fifth and Sixth Claimants**")

This notice relates to the land known as Bristol Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Fourth, Fifth and Sixth Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fourth, Fifth and Sixth Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at: https://www.Bristolairport.com/injunction.

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW2

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

Claim no: KB-2024-002317

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) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMIED
(4) NIAL SERVICES LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

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 19 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025

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 Ritchie J Order

IT IS ORDERED that:

1. The Ritchie J Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 2 of the Ritchie J Order).

2. Paragraph 2 of the Ritchie J Order is amended so as to read:

"This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-002317

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) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMIED
(4) NIAL SERVICES LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Defendants

ORDER

PENAL NOTICE

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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 19 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025

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 Ritchie J Order

IT IS ORDERED that:

1. The Ritchie J Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 2 of the Ritchie J Order).

2. Paragraph 2 of the Ritchie J Order is amended so as to read:

"This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-002317

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) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMIED
(4) NIAL SERVICES LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

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 19 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025

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 Ritchie J Order

IT IS ORDERED that:

1. The Ritchie J Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 2 of the Ritchie J Order).

2. Paragraph 2 of the Ritchie J Order is amended so as to read:

"This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-001765

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

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

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 **CLAIM NO: KB-2024-001765**
KINGS BENCH DIVISION

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

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

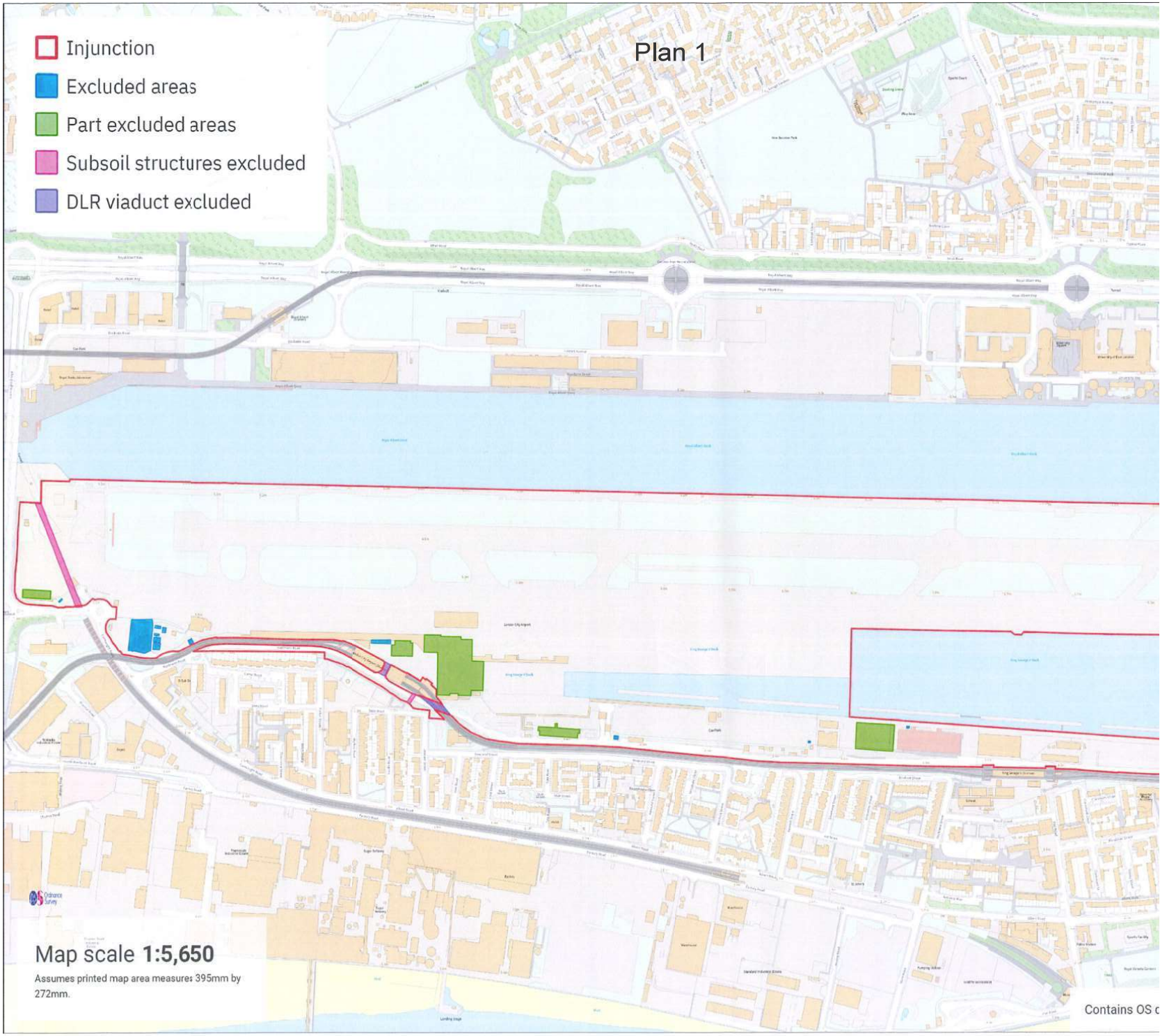
16. The Claimants' solicitors and their contact details are:

(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

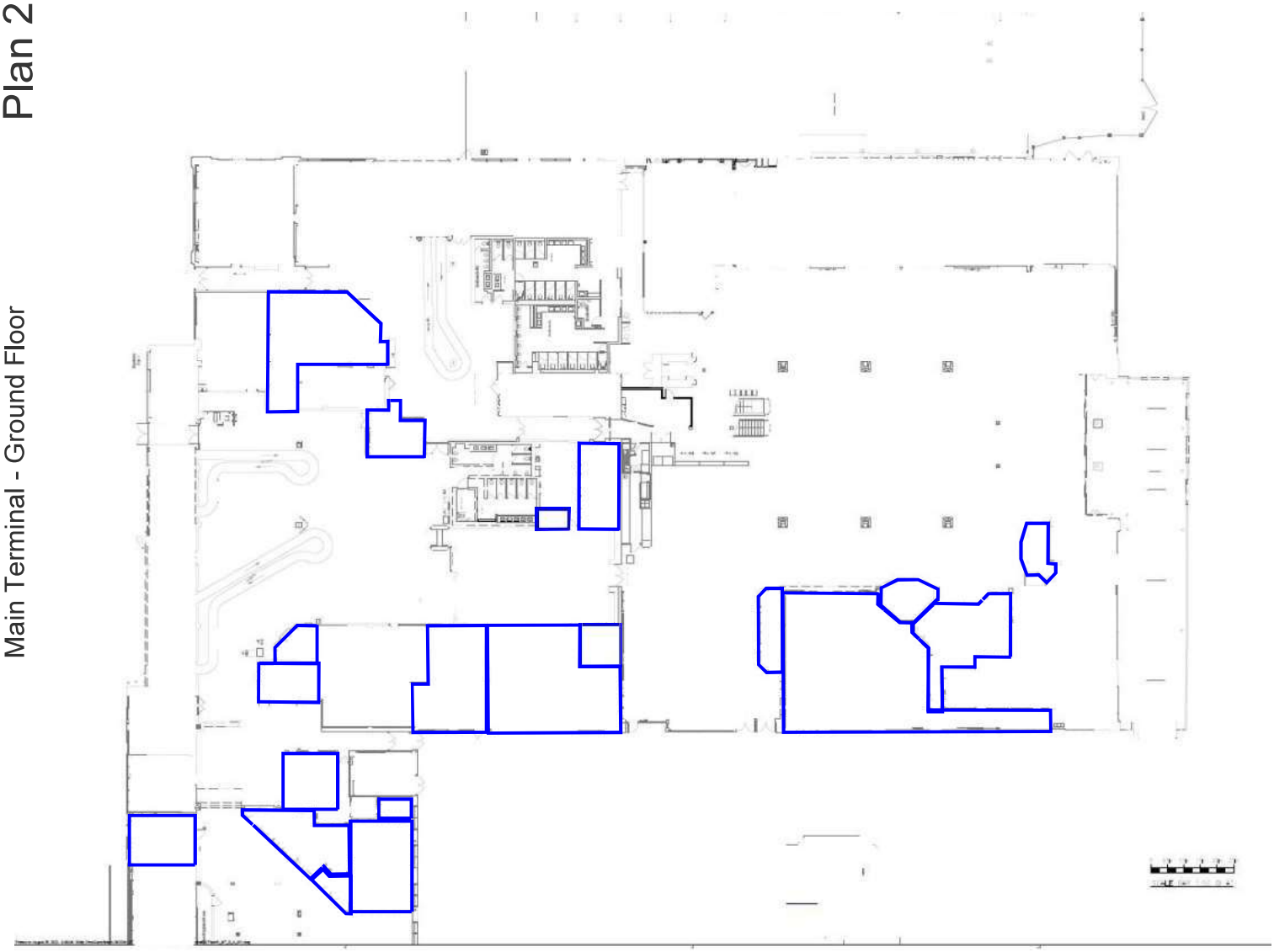
Dated: 20 June 2024

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

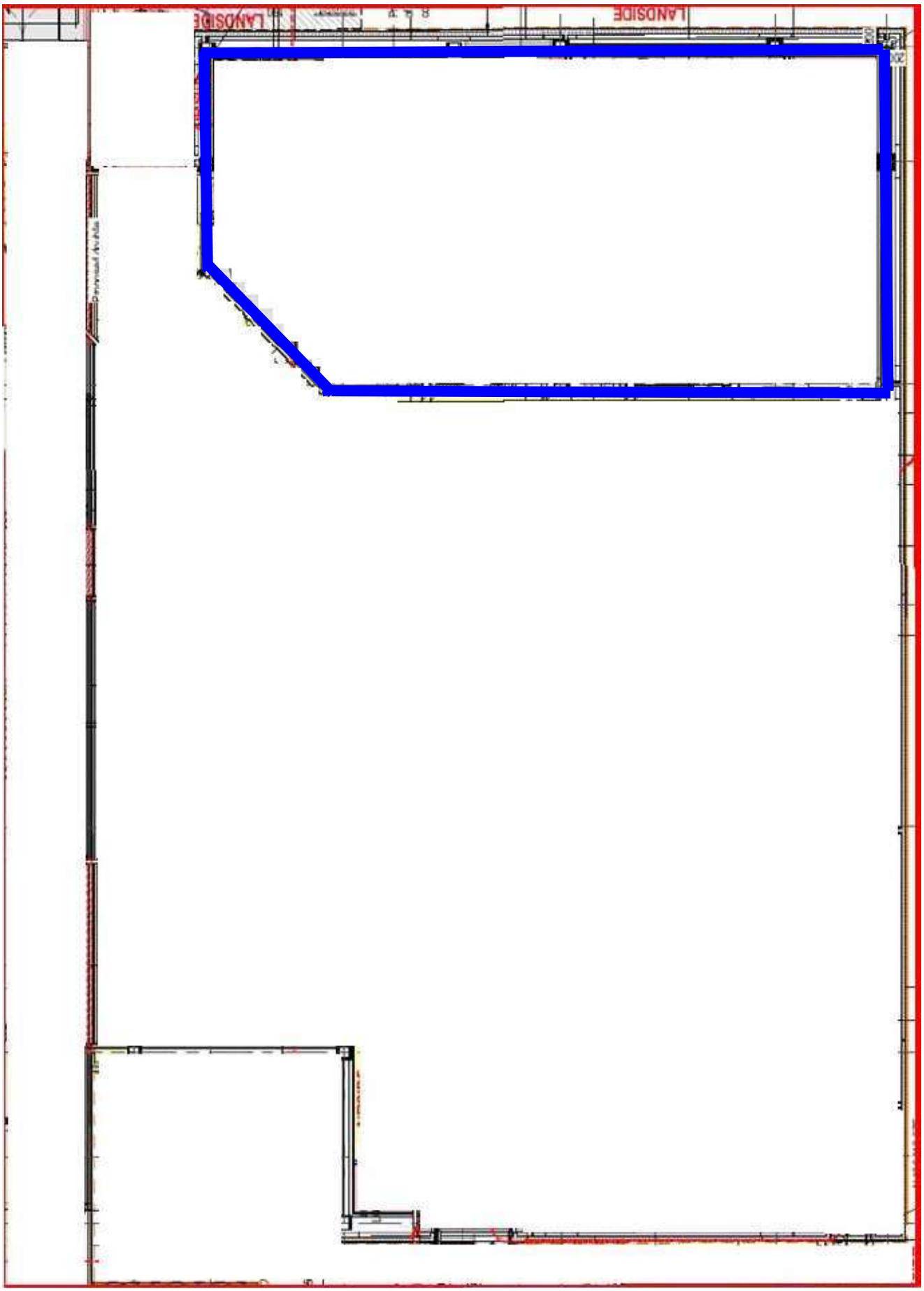
Plan 2

Main Terminal - Ground Floor



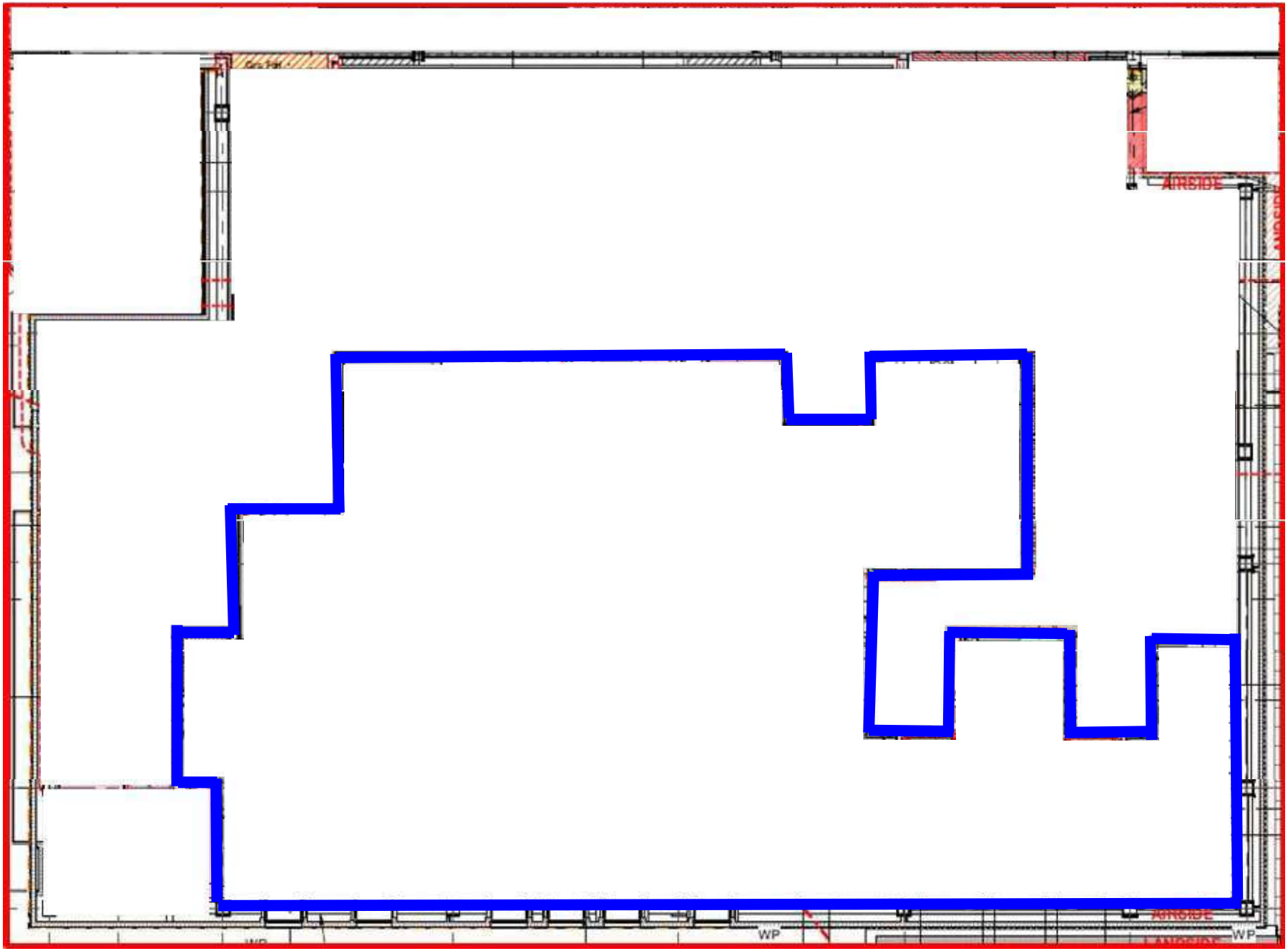
Plan 3

Terminal Immigration Facilities - Ground Floor



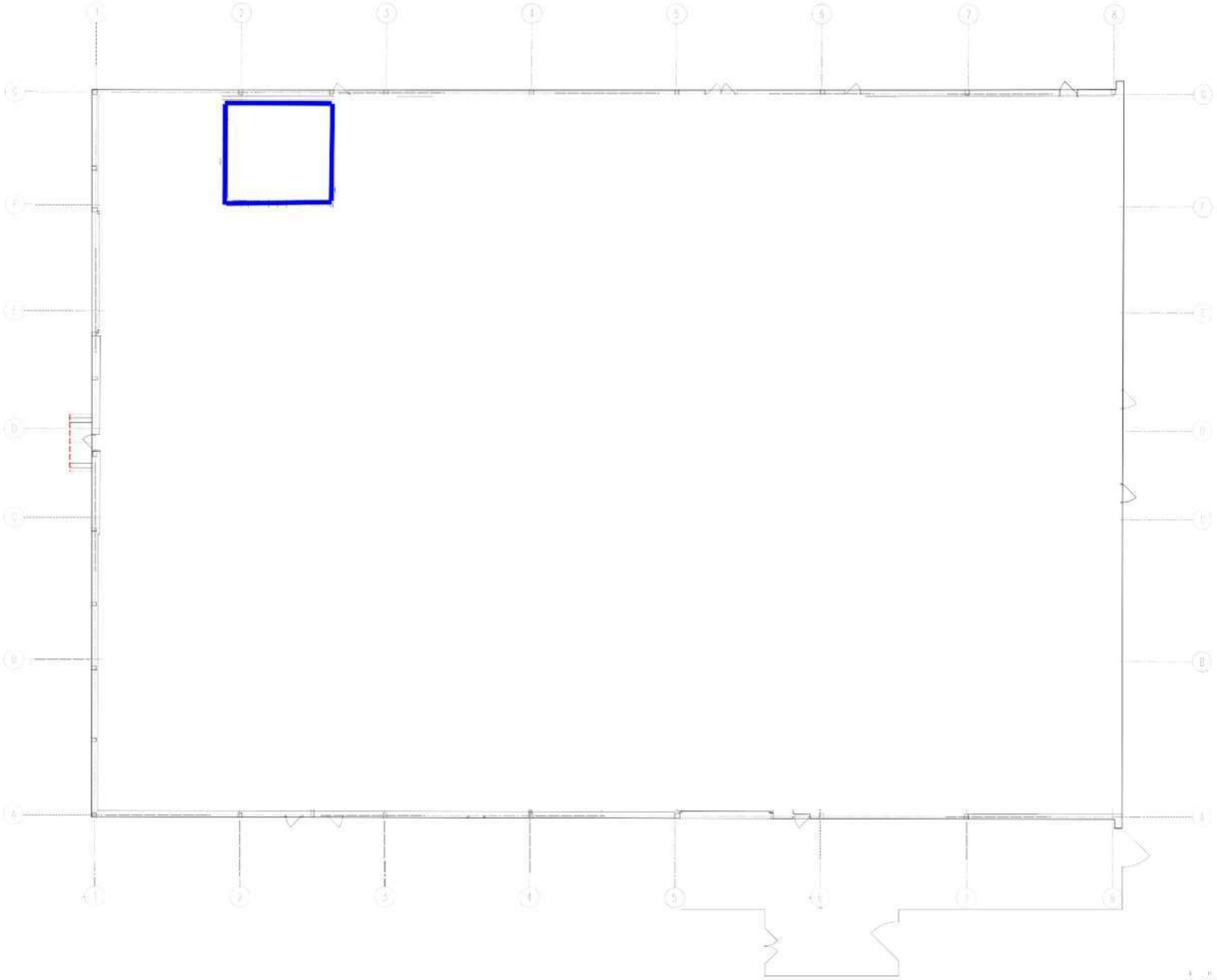
Terminal Immigration Facilities - First Floor

Plan 4



Blue Shed - Ground Floor

Plan 5



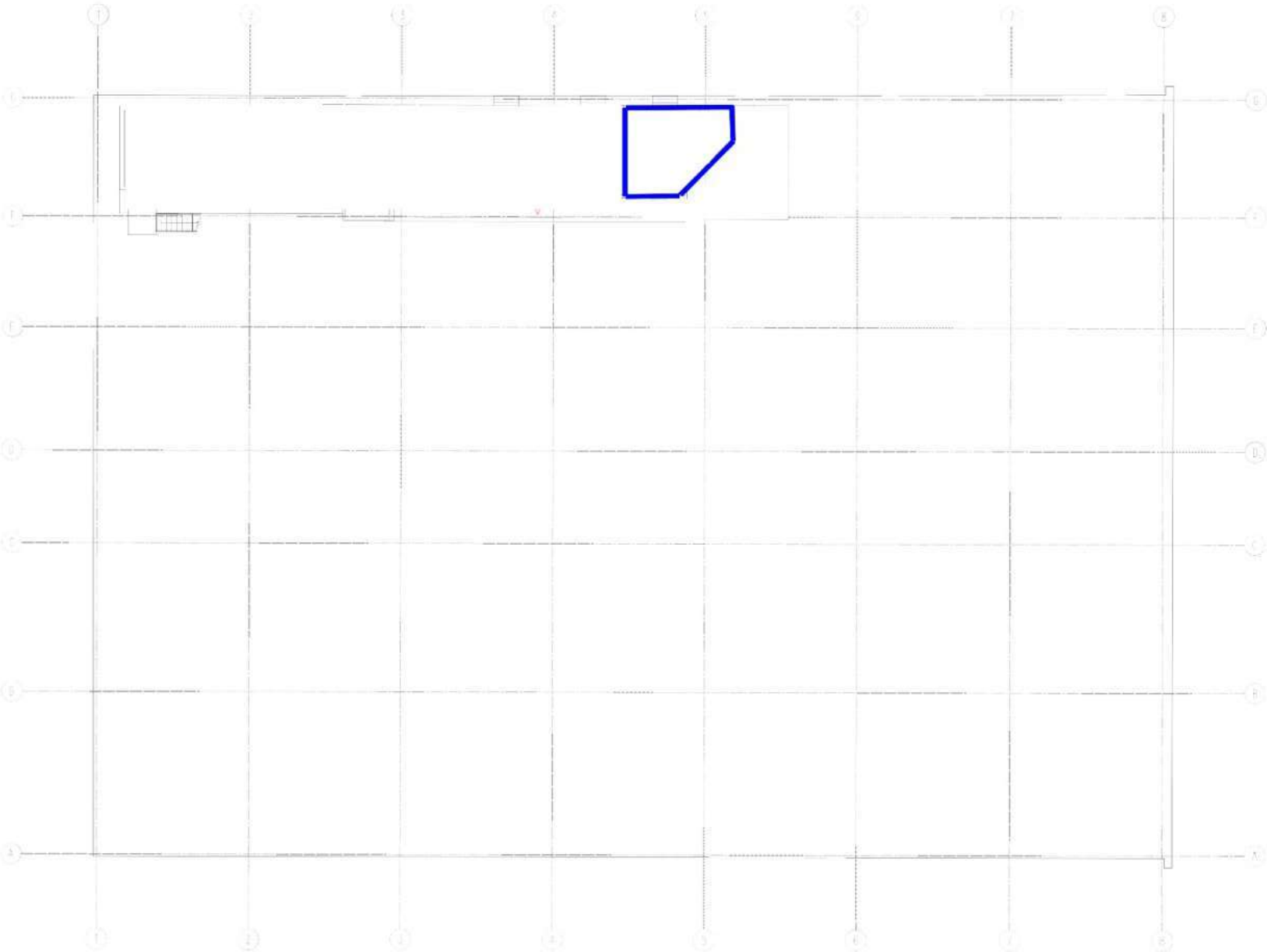
RECORD DRAWING

BLUE SHED

R/BS/G/A/001

Blue Shed - First Floor

Plan 6



LEGEND
XXXX FIRE DOOR
XXXX STANDARD DOOR

1ST FLR

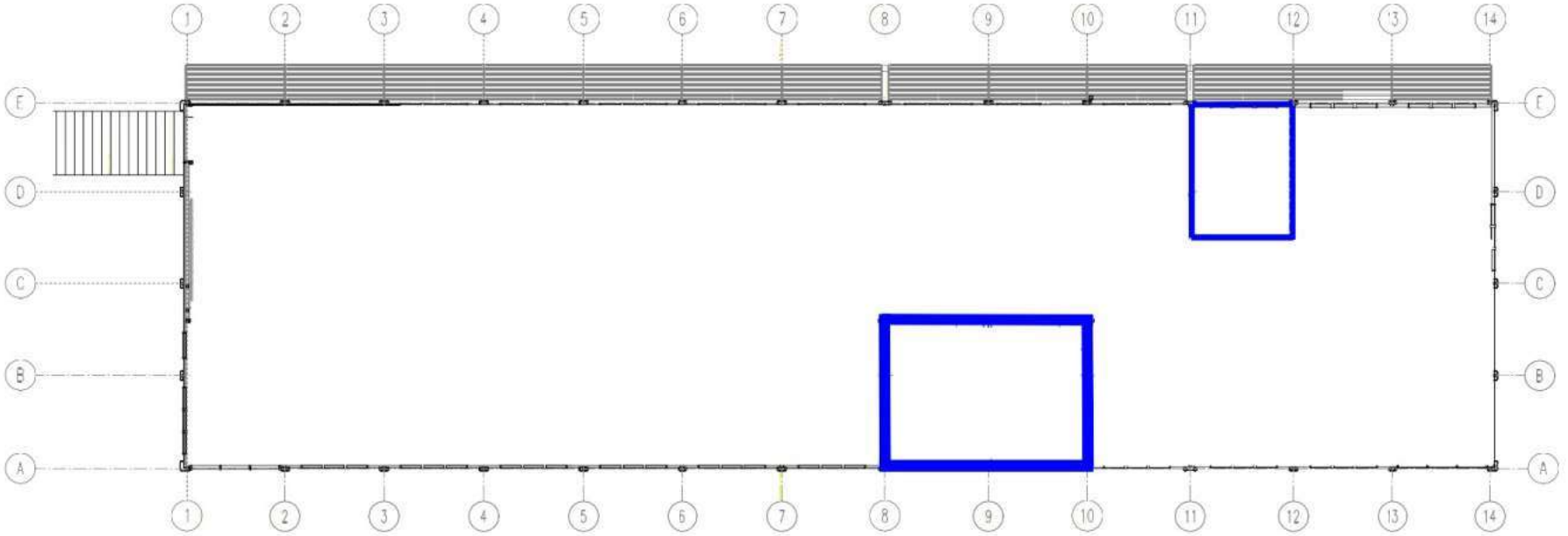
London City Airport

RECORD DRAWING

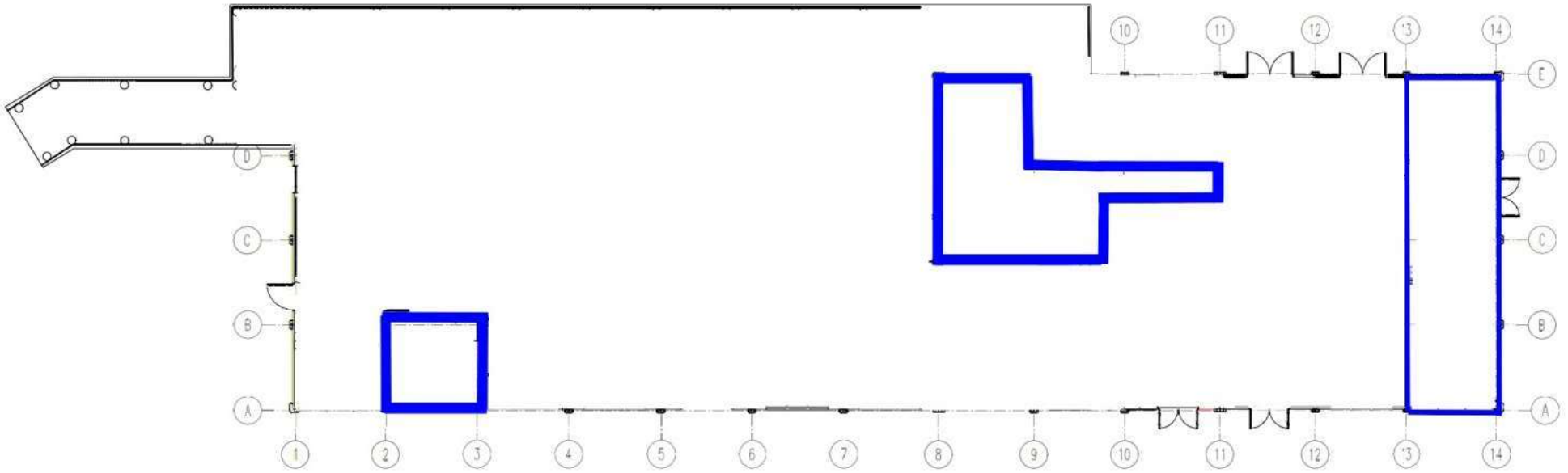
BLUE SHED

R/BS/1/A/001

Jet Centre - Ground Floor



Jet Centre - First Floor



LEGEND

XXX Fire Door

XXX Standard Door

London City Airport

Jet Centre

RECORD DRAWING

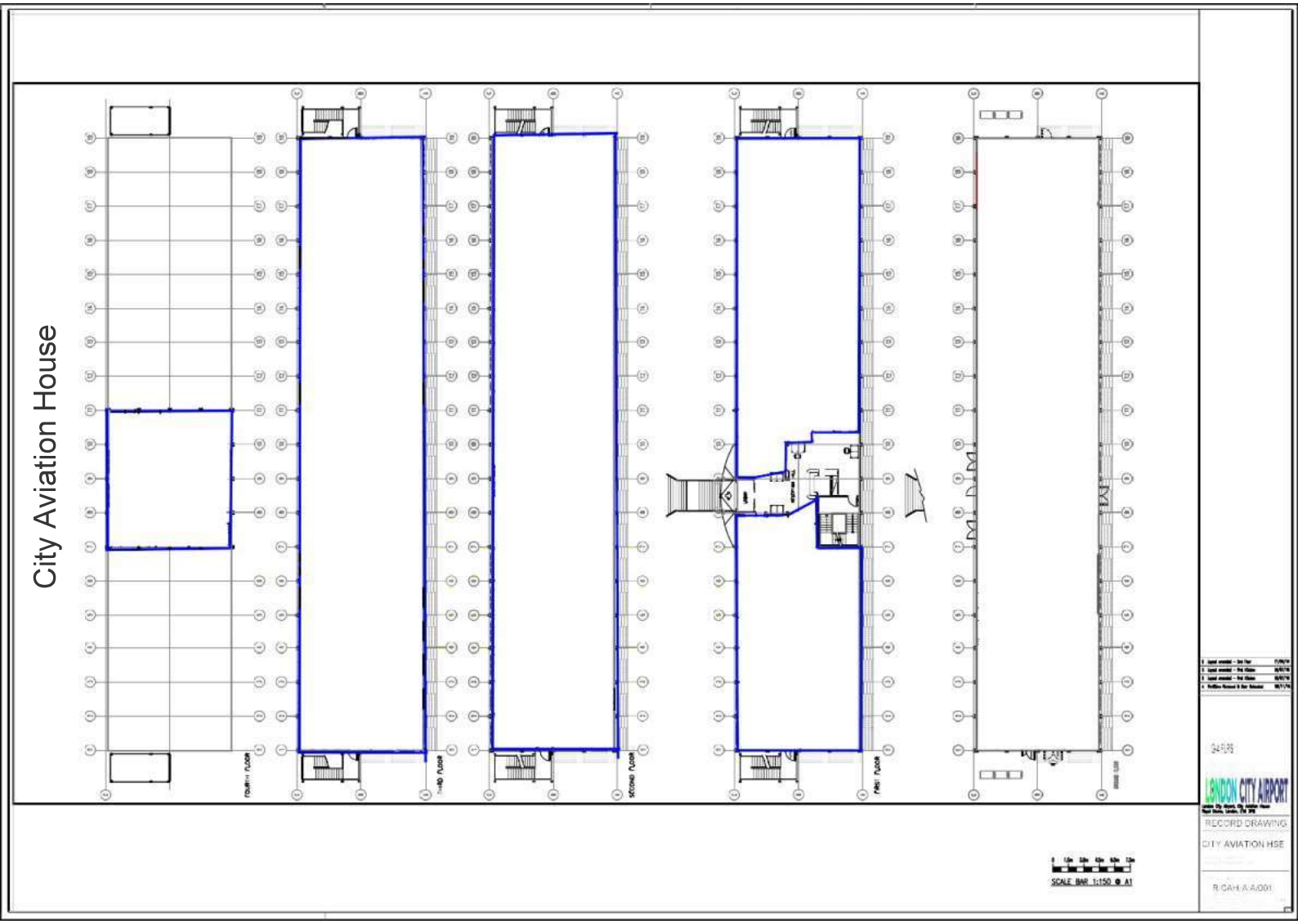
JET CENTRE

RJJC/A/A/001

SCALE BAR 1:75 @ A1

Plan 8

City Aviation House



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

Claim no: KB-2024-002132

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) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) PLC
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants



-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

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 5 July 2024 by HHJ Coe KC ("**the HHJ Coe KC Order**")

AND UPON the Claimants' application dated 2 June 2025

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 HHJ Coe KC Order

IT IS ORDERED that:

1. The HHJ Coe KC Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 4 of the HHJ Coe KC Order).

2. Paragraph 4 of the HHJ Coe KC Order is amended so as to read:

"This Order is subject to periodic review by the Court on application by the Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-002473

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) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORT LIMITED
(6) BRISTOL AIRPORT DEVELOPMENT LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

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 6 August 2024 by Jacobs J ("**the Jacobs J Order**")

AND UPON the Claimants' application dated 2 June 2025

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 Jacobs J Order

IT IS ORDERED that:

1. The Jacobs J Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 2 of the Jacobs Order).

2. Paragraph 2 of the Jacobs J Order is amended so as to read:

"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 the Claims, 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. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

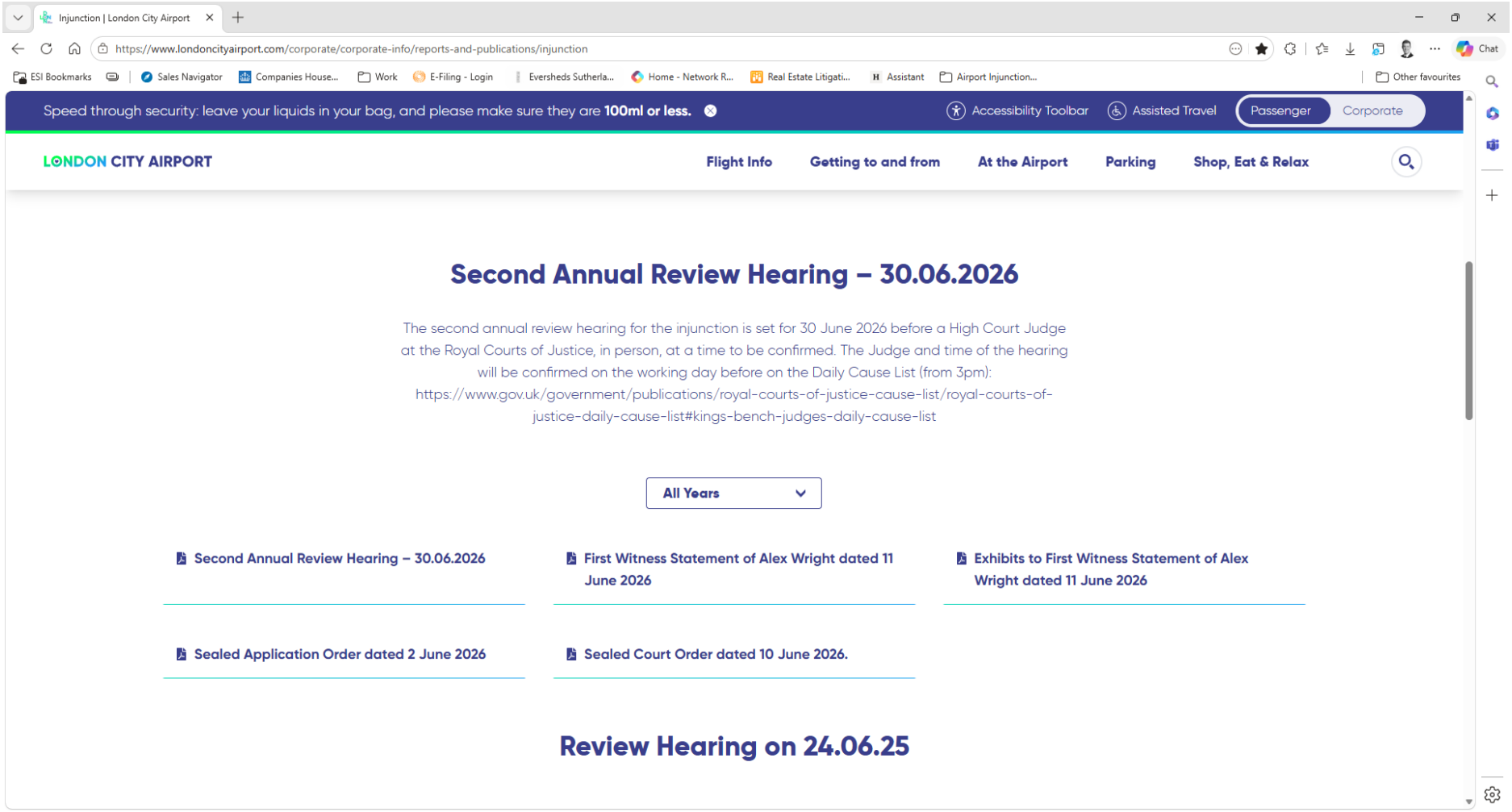
(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

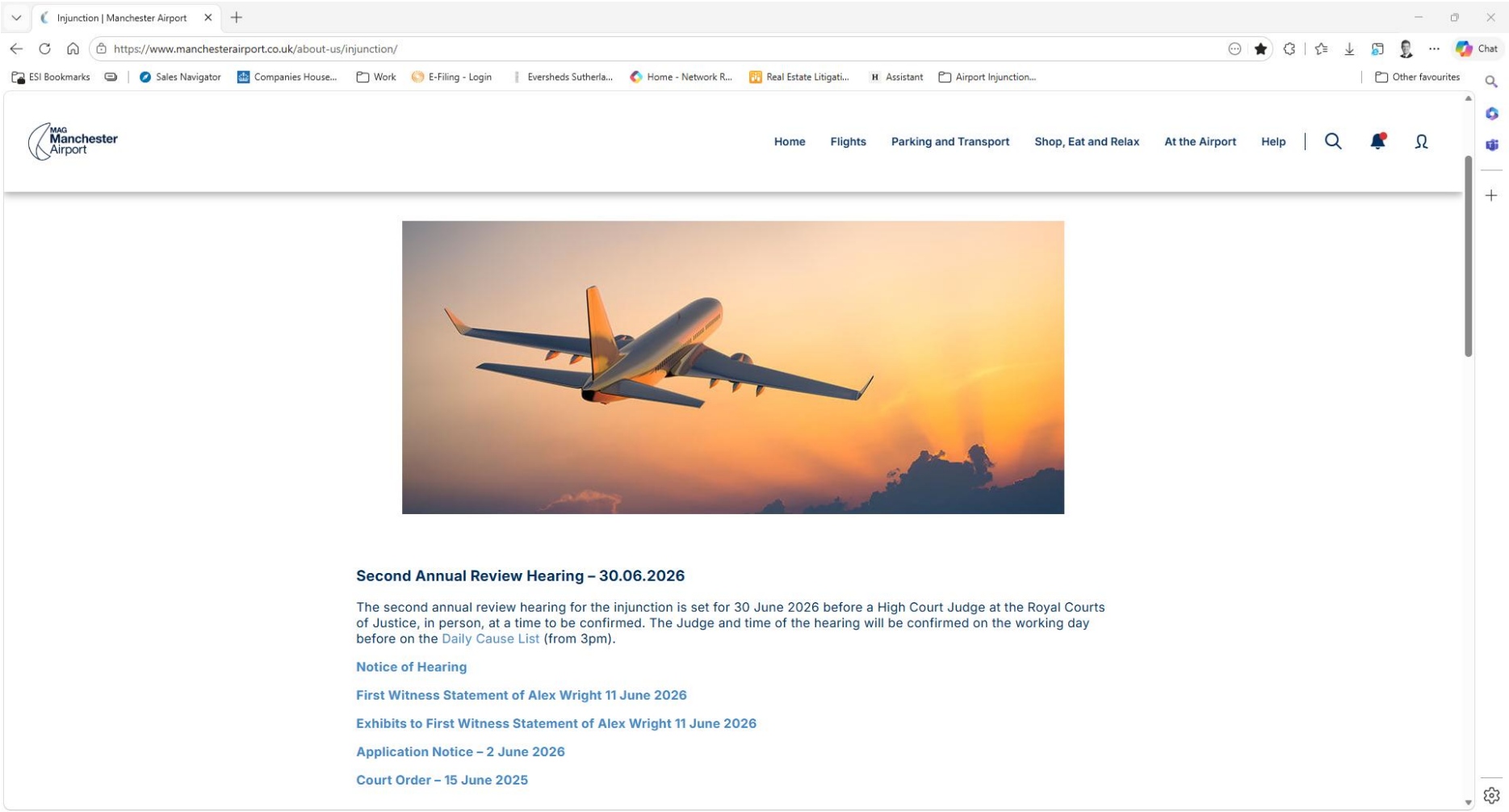
and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW3

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


Injunction | London City Airport
https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction
Speed through security: leave your liquids in your bag, and please make sure they are 100ml or less.
Accessibility Toolbar
Assisted Travel
Passenger
Corporate
LONDON CITY AIRPORT
Flight Info
Getting to and from
At the Airport
Parking
Shop, Eat & Relax
Second Annual Review Hearing – 30.06.2026
The second annual review hearing for the injunction is set for 30 June 2026 before a High Court Judge at the Royal Courts of Justice, in person, at a time to be confirmed. 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
All Years
Second Annual Review Hearing – 30.06.2026
First Witness Statement of Alex Wright dated 11 June 2026
Exhibits to First Witness Statement of Alex Wright dated 11 June 2026
Sealed Application Order dated 2 June 2026
Sealed Court Order dated 10 June 2026.
Review Hearing on 24.06.25



Second Annual Review Hearing – 30.06.2026

The second annual review hearing for the injunction is set for 30 June 2026 before a High Court Judge at the Royal Courts of Justice, in person, at a time to be confirmed. The Judge and time of the hearing will be confirmed on the working day before on the Daily Cause List (from 3pm).

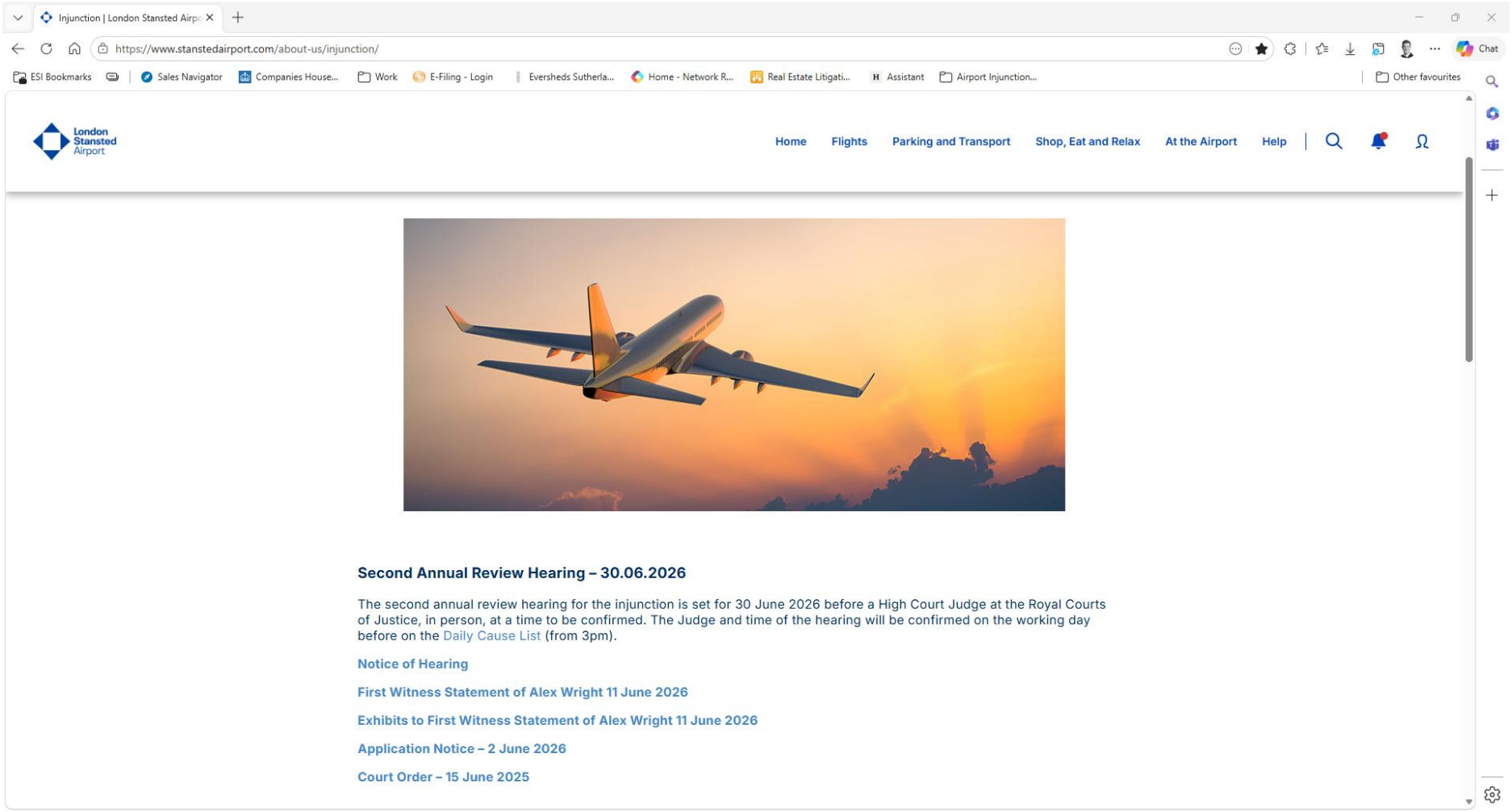
Notice of Hearing

First Witness Statement of Alex Wright 11 June 2026

Exhibits to First Witness Statement of Alex Wright 11 June 2026

Application Notice – 2 June 2026

Court Order – 15 June 2025



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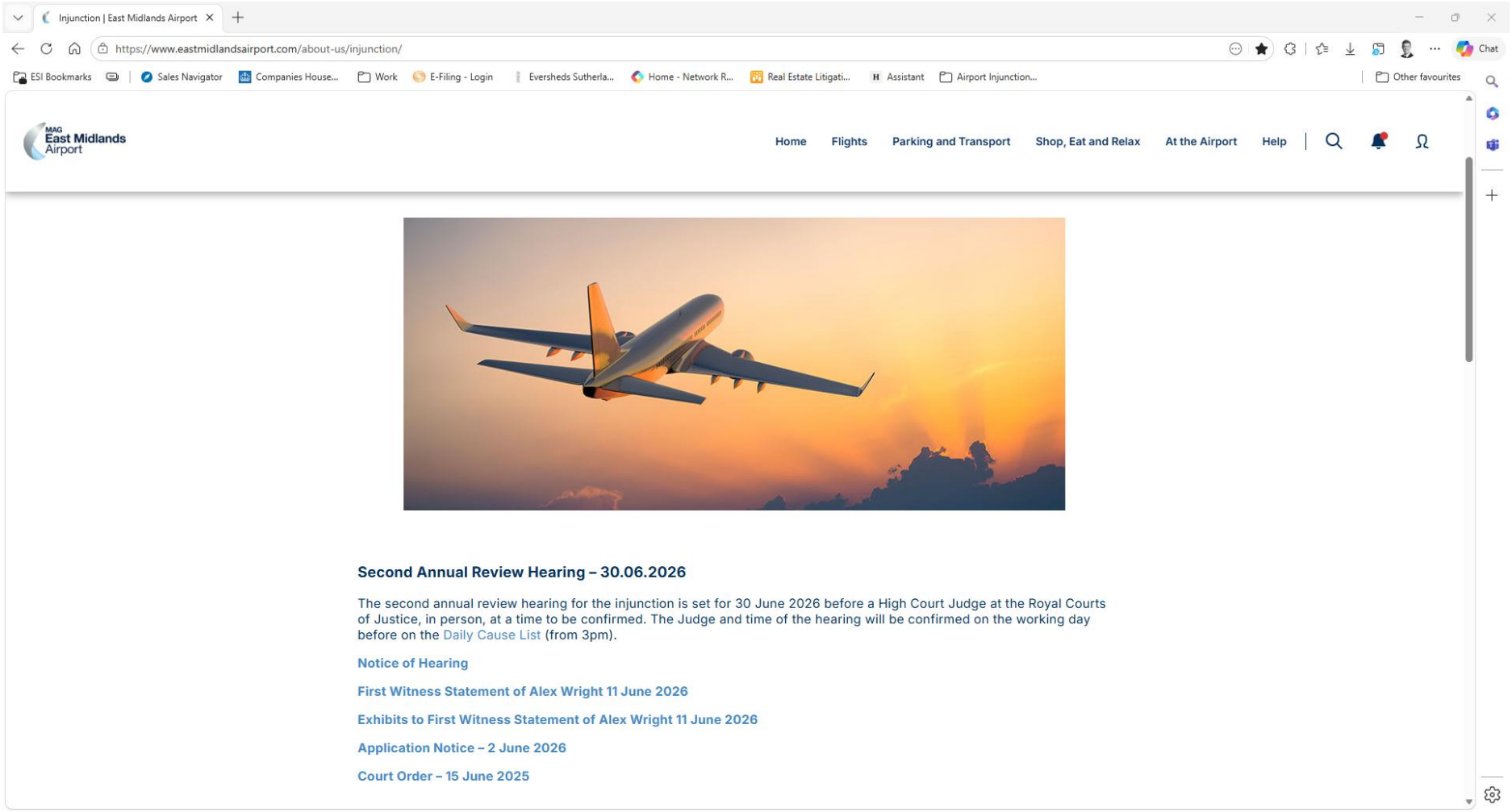

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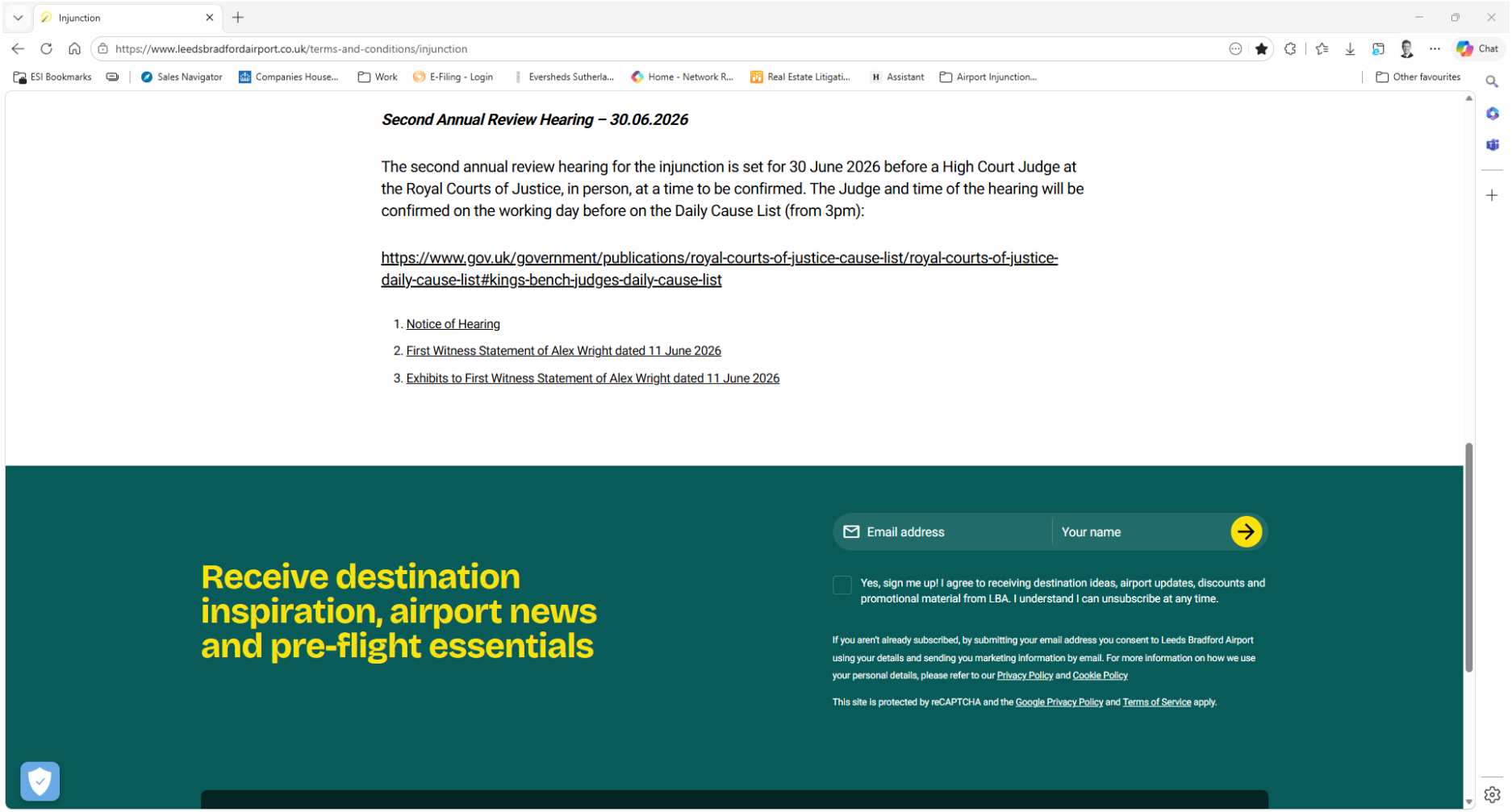
Injunction
https://www.leedsbradfordairport.co.uk/terms-and-conditions/injunction
Chat
ESI Bookmarks
Sales Navigator
Companies House...
Work
E-Filing - Login
Eversheds Sutherla...
Home - Network R...
Real Estate Litigati...
Assistant
Airport Injunction...
Other favourites
Second Annual Review Hearing – 30.06.2026
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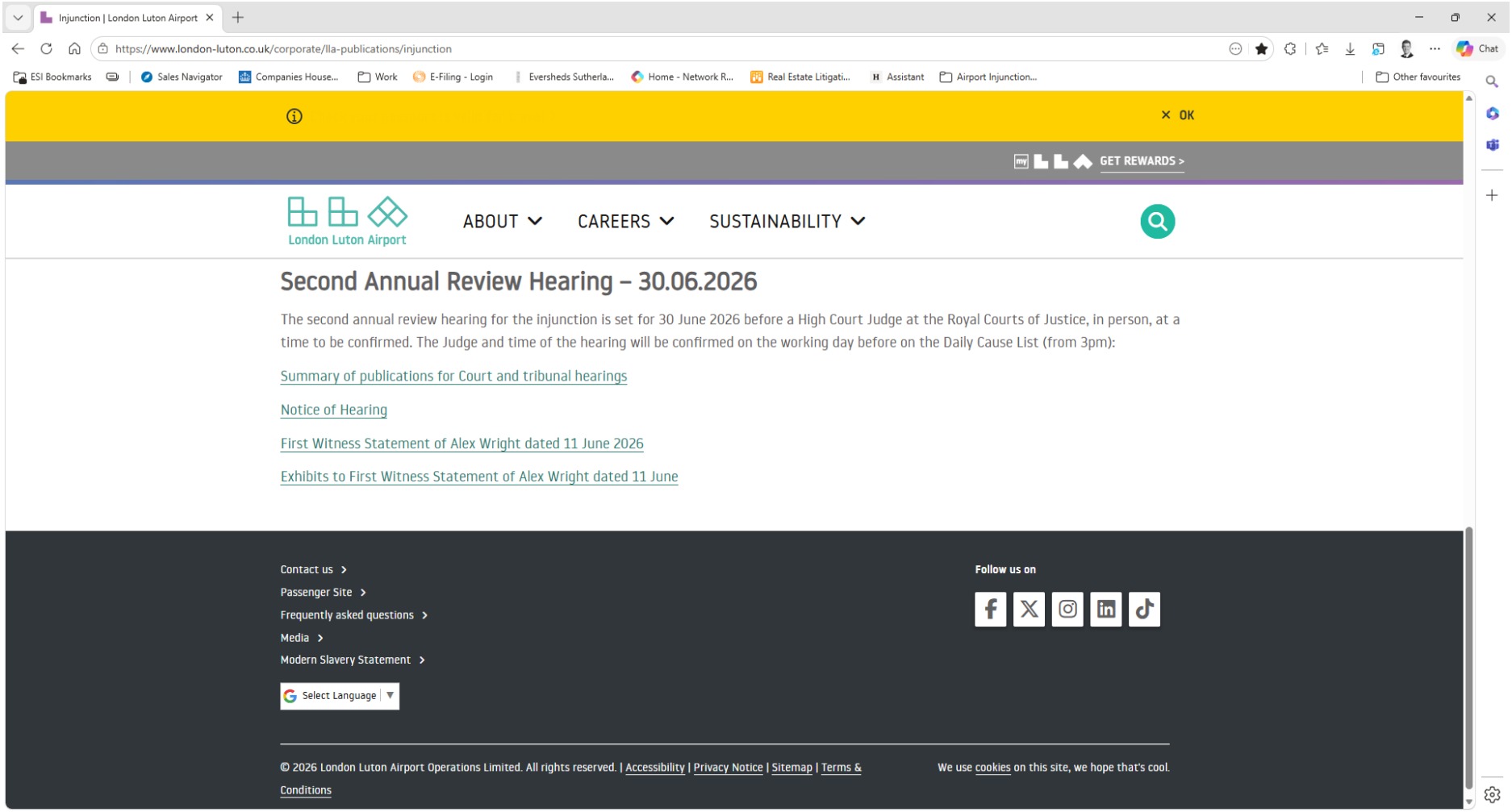
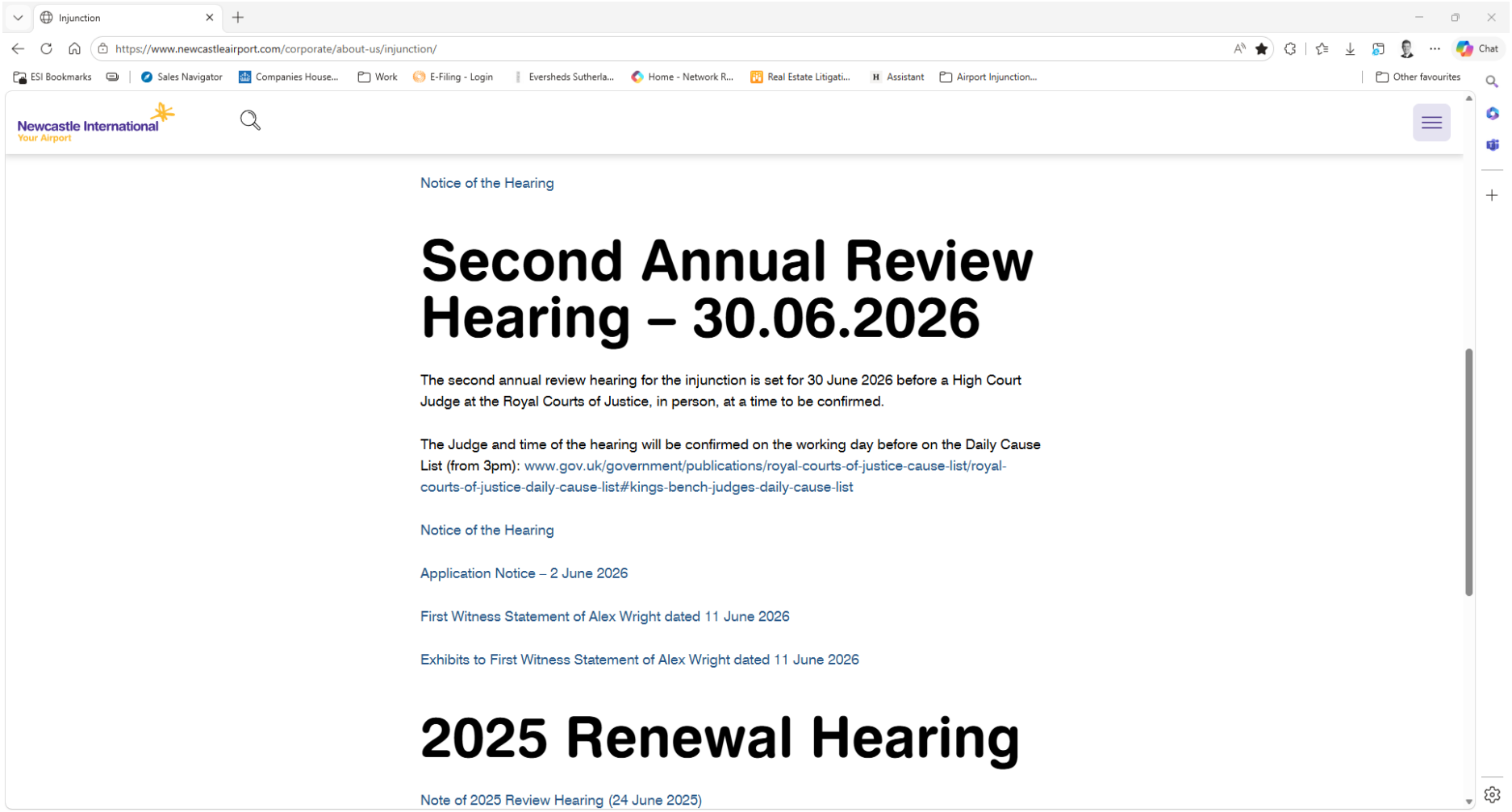
https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list#kings-bench-judges-daily-cause-list
1. Notice of Hearing
2. First Witness Statement of Alex Wright dated 11 June 2026
3. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026
Receive destination inspiration, airport news and pre-flight essentials
Email address
Your name
Yes, sign me up! I agree to receiving destination ideas, airport updates, discounts and promotional material from LBA. I understand I can unsubscribe at any time.
If you aren't already subscribed, by submitting your email address you consent to Leeds Bradford Airport using your details and sending you marketing information by email. For more information on how we use your personal details, please refer to our Privacy Policy and Cookie Policy
This site is protected by reCAPTCHA and the Google Privacy Policy and Terms of Service apply.


Injunction | London Luton Airport
https://www.london-luton.co.uk/corporate/lla-publications/injunction
ESI Bookmarks
Sales Navigator
Companies House...
Work
E-Filing - Login
Eversheds Sutherla...
Home - Network R...
Real Estate Litigati...
Assistant
Airport Injunction...
Other favourites
Chat
OK
GET REWARDS >
London Luton Airport
ABOUT
CAREERS
SUSTAINABILITY
Second Annual Review Hearing – 30.06.2026
The second annual review hearing for the injunction is set for 30 June 2026 before a High Court Judge at the Royal Courts of Justice, in person, at a time to be confirmed. The Judge and time of the hearing will be confirmed on the working day before on the Daily Cause List (from 3pm):
Summary of publications for Court and tribunal hearings
Notice of Hearing
First Witness Statement of Alex Wright dated 11 June 2026
Exhibits to First Witness Statement of Alex Wright dated 11 June
Contact us
Passenger Site
Frequently asked questions
Media
Modern Slavery Statement
Select Language
Follow us on
© 2026 London Luton Airport Operations Limited. All rights reserved. | Accessibility | Privacy Notice | Sitemap | Terms & Conditions
We use cookies on this site, we hope that's cool.


Injunction
https://www.newcastleairport.com/corporate/about-us/injunction/
Chat
ESI Bookmarks
Sales Navigator
Companies House...
Work
E-Filing - Login
Eversheds Sutherla...
Home - Network R...
Real Estate Litigati...
Assistant
Airport Injunction...
Other favourites
Newcastle International
Your Airport
Notice of the Hearing
Second Annual Review Hearing – 30.06.2026
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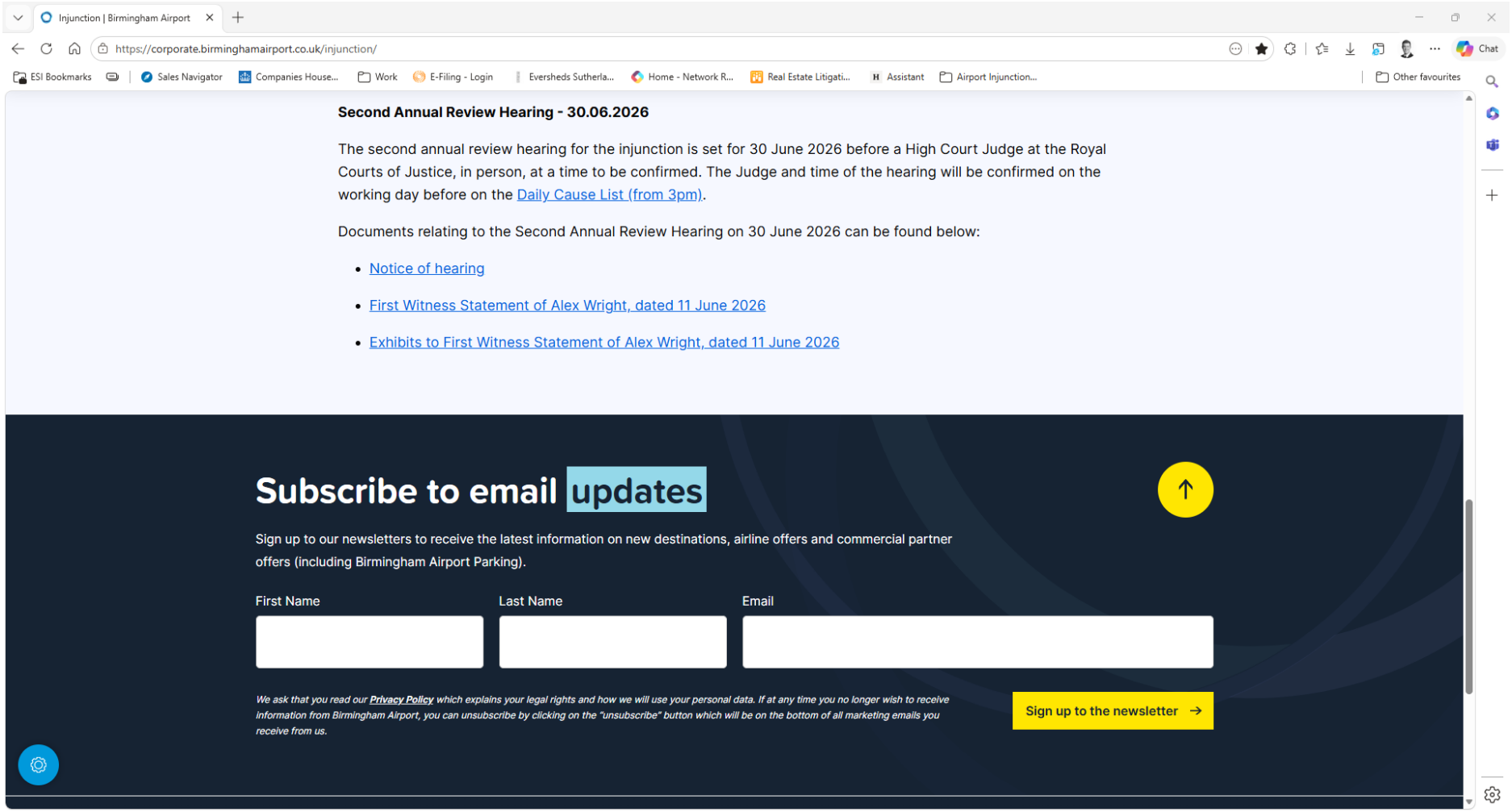
The Judge and time of the hearing will be confirmed on the working day before on the Daily Cause List (from 3pm): www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list#kings-bench-judges-daily-cause-list
Notice of the Hearing
Application Notice – 2 June 2026
First Witness Statement of Alex Wright dated 11 June 2026
Exhibits to First Witness Statement of Alex Wright dated 11 June 2026
2025 Renewal Hearing
Note of 2025 Review Hearing (24 June 2025)


Injunction | Birmingham Airport
https://corporate.birminghamairport.co.uk/injunction/
Chat
ESI Bookmarks
Sales Navigator
Companies House...
Work
E-Filing - Login
Eversheds Sutherla...
Home - Network R...
Real Estate Litigati...
Assistant
Airport Injunction...
Other favourites
Second Annual Review Hearing - 30.06.2026
The second annual review hearing for the injunction is set for 30 June 2026 before a High Court Judge at the Royal Courts of Justice, in person, at a time to be confirmed. The Judge and time of the hearing will be confirmed on the working day before on the Daily Cause List (from 3pm).
Documents relating to the Second Annual Review Hearing on 30 June 2026 can be found below:
Notice of hearing
First Witness Statement of Alex Wright, dated 11 June 2026
Exhibits to First Witness Statement of Alex Wright, dated 11 June 2026
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First Name
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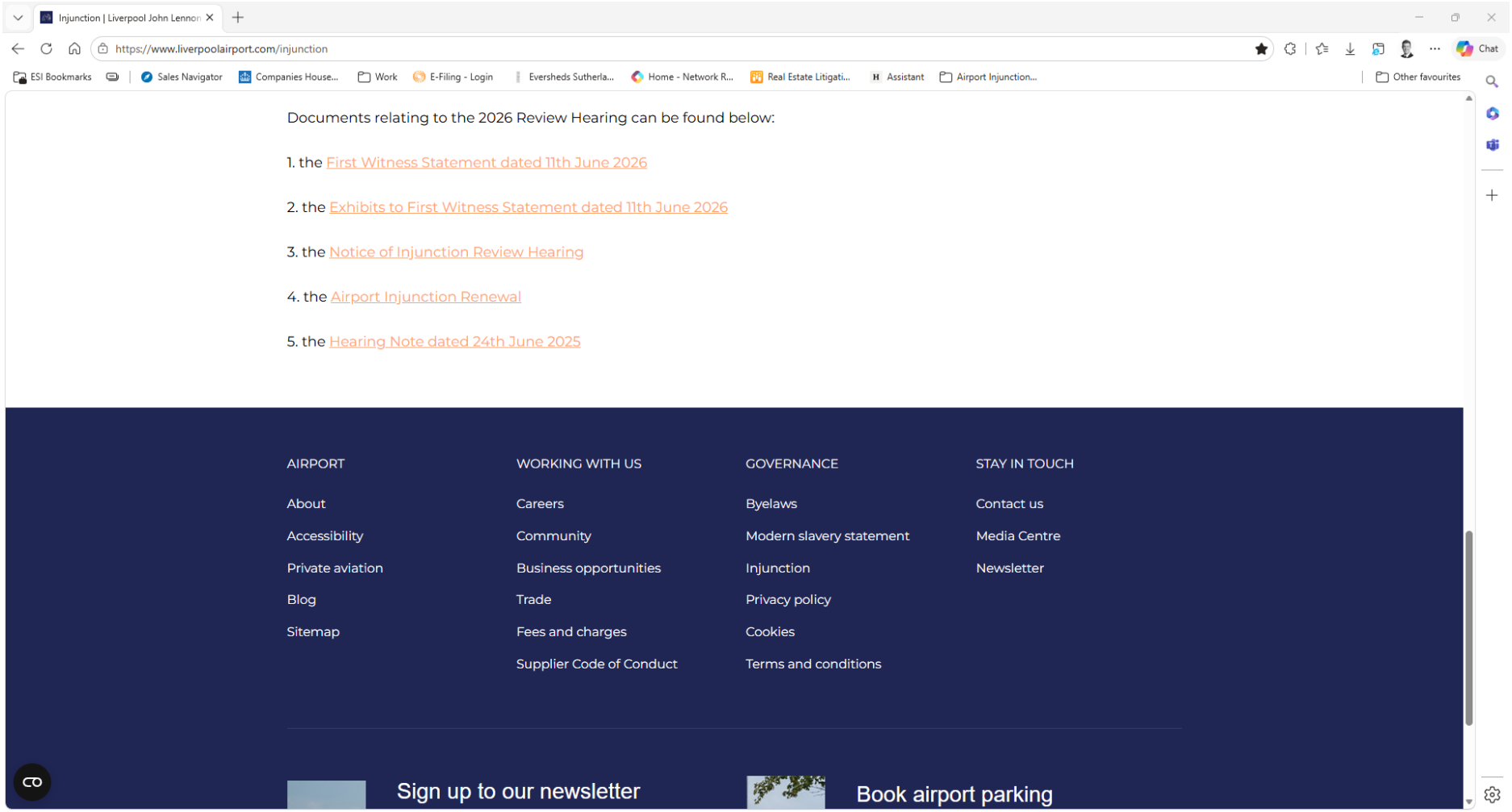
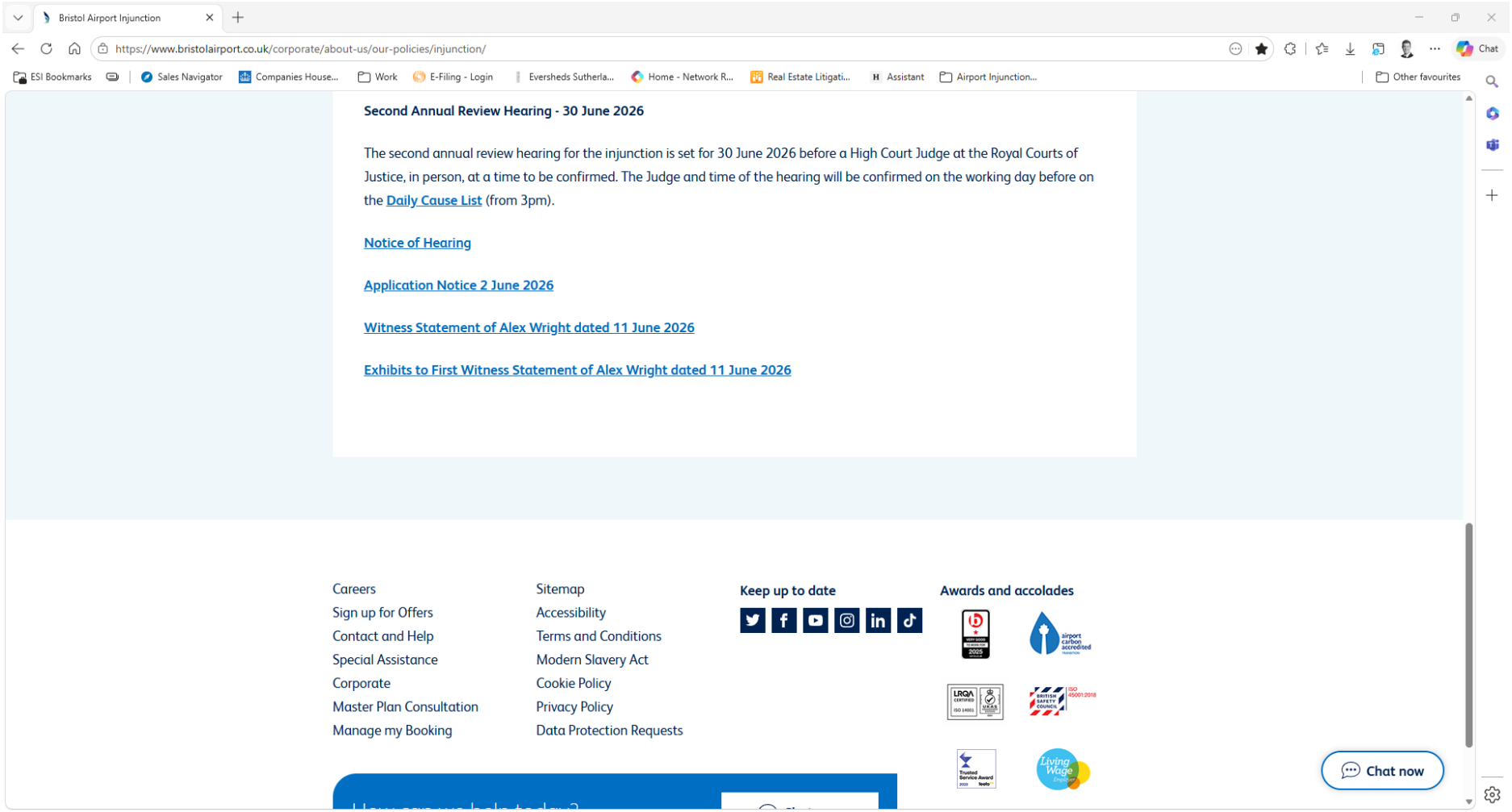

Injunction | Liverpool John Lennon
https://www.liverpoolairport.com/injunction
Chat
ESI Bookmarks
Sales Navigator
Companies House...
Work
E-Filing - Login
Eversheds Sutherla...
Home - Network R...
Real Estate Litigati...
Assistant
Airport Injunction...
Other favourites
Documents relating to the 2026 Review Hearing can be found below:
1. the First Witness Statement dated 11th June 2026
2. the Exhibits to First Witness Statement dated 11th June 2026
3. the Notice of Injunction Review Hearing
4. the Airport Injunction Renewal
5. the Hearing Note dated 24th June 2025
AIRPORT
About
Accessibility
Private aviation
Blog
Sitemap
WORKING WITH US
Careers
Community
Business opportunities
Trade
Fees and charges
Supplier Code of Conduct
GOVERNANCE
Byelaws
Modern slavery statement
Injunction
Privacy policy
Cookies
Terms and conditions
STAY IN TOUCH
Contact us
Media Centre
Newsletter
Sign up to our newsletter
Book airport parking


Bristol Airport Injunction
https://www.bristolairport.co.uk/corporate/about-us/our-policies/injunction/
Second Annual Review Hearing - 30 June 2026
The second annual review hearing for the injunction is set for 30 June 2026 before a High Court Judge at the Royal Courts of Justice, in person, at a time to be confirmed. The Judge and time of the hearing will be confirmed on the working day before on the Daily Cause List (from 3pm).
Notice of Hearing
Application Notice 2 June 2026
Witness Statement of Alex Wright dated 11 June 2026
Exhibits to First Witness Statement of Alex Wright dated 11 June 2026
Careers
Sign up for Offers
Contact and Help
Special Assistance
Corporate
Master Plan Consultation
Manage my Booking
Sitemap
Accessibility
Terms and Conditions
Modern Slavery Act
Cookie Policy
Privacy Policy
Data Protection Requests
Keep up to date
Awards and accolades
Chat now

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW4

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

From: Wright, Alexander
Sent: 11 June 2026 18:12
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion
Subject: Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: Witness Statement - Alex Wright - 11.06.26 - BHX, LJLA and BRS - KB-2024-002473(252713458.1).pdf; You've been sent large files; LJA - Notice of Hearing(240929148.1)(252667474.1).pdf; BHX - Notice of Hearing(240929219.1)(252667490.1).pdf; BRS - Notice of Hearing(240929011.1)(252667601.1).pdf

To whom it may concern

We write further to the first review hearing heard by Bourne J on 24 June 2025, in respect of the injunctions granted in these proceedings by Order dated 6 August 2024 by Jacobs J.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of Birmingham Airport;
2. Notice of Hearing in respect of Liverpool John Lennon Airport;
3. Notice of Hearing in respect of Bristol Airport;
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed also.

Airport	Action Number	Webpage address
Birmingham Airport	KB-2024-2473	Injunction | Birmingham Airport Website
Liverpool John Lennon Airport		Liverpool John Lennon Airport
Bristol Airport		Bristol Airport Injunction

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

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www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

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From: Wright, Alexander
Sent: 12 June 2026 13:14
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion
Subject: Leeds Bradford Airport, London Luton Airport and Newcastle International Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: Witness Statement - Alex Wright - 11.06.26 - LBA, NCL and LTN - KB-2024-002317(252728271.1).pdf; You've been sent large files; LBA - Notice of Hearing(240927169.1)(252667494.1).pdf; NCL - Notice of Hearing(240927223.1)(252667446.1).pdf; LTN - Notice of Hearing(240927409.1)(252667460.1).pdf

To whom it may concern

We write further to the first review hearing heard by Bourne J on 24 June 2025, in respect of the injunctions granted in these proceedings by Order dated 19 July 2024 by Ritchie J.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of Leeds Bradford Airport;
2. Notice of Hearing in respect of London Luton Airport;
3. Notice of Hearing in respect of Newcastle International Airport;
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed also.

Airport	Action Number	Webpage address
Leeds Bradford Airport	KB-2024-2317	Injunction | Leeds Bradford Airport
London Luton Airport		Injunction | London Luton Airport
Newcastle International Airport		Injunction

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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www.eversheds-sutherland.com

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From: Wright, Alexander
Sent: 12 June 2026 15:51
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion
Subject: RE: London City Airport - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: You've been sent large files

To whom it may concern

Further to our below email, please see attached by way of service an updated version of the Exhibits to the First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email)

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

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www.eversheds-sutherland.com

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---

From: Wright, Alexander
Sent: 11 June 2026 18:10
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion <enquiries@extinctionrebellion.uk>
Subject: London City Airport - Notice of Second Annual Review Hearing (30 June 2026)

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.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of London City Airport;
2. Sealed Application Order dated 2 June 2026;
3. Sealed Court Order dated 10 June 2026
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at the below website.

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

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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www.eversheds-sutherland.com

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From: Wright, Alexander
Sent: 11 June 2026 18:10
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion
Subject: London City Airport - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: Witness Statement - Alex Wright - 11.06.26 - LCY - KB-2024-001765(252715475.1).pdf; You've been sent large files; Sealed Application - 2.06.26 - KB-2024-1765 - LCY(252729203.1).pdf; Sealed Order - LCY - 10.06.26(252729207.1).pdf; LCY - Notice of Hearing(252667499.1).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.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of London City Airport;
2. Sealed Application Order dated 2 June 2026;
3. Sealed Court Order dated 10 June 2026
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at the below website.

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

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

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From: Wright, Alexander
Sent: 11 June 2026 18:04
To: Extinction Rebellion
Subject: Manchester Airport, Stansted Airport and East Midlands Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: Witness Statement - Alex Wright - 11.06.26 - MAG, STN and EMA - KB-2024-002132(252716244.1).pdf; You've been sent large files; MAN - Notice of Hearing(240927570.1)(252667559.1).pdf; STN - Notice of Hearing(240927728.1)(252667564.1).pdf; EMA - Notice of Hearing(240927660.1)(252667466.1).pdf

To whom it may concern

We write further in respect of the above proceedings and following the first review hearing heard by Bourne J on 24 June 2025, in respect of the injunctions granted in these proceedings by Order dated 5 July 2024 by HHJ Coe KC.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of Manchester Airport;
2. Notice of Hearing in respect of Stanstead Airport;
3. Notice of Hearing in respect of East Midlands Airport;
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed also.

Airport	Action Number	Webpage address
Manchester Airport	KB-2024-2132	Injunction | Manchester Airport
Stansted Airport		London Stansted Airport Injunction | London Stansted Airport
East Midlands Airport		Injunction | East Midlands Airport

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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www.eversheds-sutherland.com

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From: Wright, Alexander
Sent: 11 June 2026 17:58
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me
Subject: Manchester Airport, Stansted Airport and East Midlands Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: Witness Statement - Alex Wright - 11.06.26 - MAG, STN and EMA - KB-2024-002132(252716244.1).pdf; You've been sent large files; MAN - Notice of Hearing(240927570.1)(252667559.1).pdf; STN - Notice of Hearing(240927728.1)(252667564.1).pdf; EMA - Notice of Hearing(240927660.1)(252667466.1).pdf

To whom it may concern

We write further in respect of the above proceedings and following the first review hearing heard by Bourne J on 24 June 2025, in respect of the injunctions granted in these proceedings by Order dated 5 July 2024 by HHJ Coe KC.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of Manchester Airport;
2. Notice of Hearing in respect of Stanstead Airport;
3. Notice of Hearing in respect of East Midlands Airport;
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed also.

Airport	Action Number	Webpage address
Manchester Airport	KB-2024-2132	Injunction | Manchester Airport
Stansted Airport		London Stansted Airport Injunction | London Stansted Airport
East Midlands Airport		Injunction | East Midlands Airport

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW5

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

From: Postmaster2
Sent: 12 June 2026 15:51
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- shut_the_system_info@proton.me

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <shut_the_system_info@proton.me>: Recipient address rejected: Recipient mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

From: Postmaster2
Sent: 12 June 2026 15:51
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- enquiries@extinctionrebellion.co.uk

could not be delivered. The problem appears to be :
-- Recipient email address is possibly incorrect

Additional information follows :
-- Unrouteable address

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

From: Postmaster2
Sent: 12 June 2026 13:15
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- shut_the_system_info@proton.me

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <shut_the_system_info@proton.me>: Recipient address rejected: Recipient mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

From: Postmaster2
Sent: 12 June 2026 13:15
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- enquiries@extinctionrebellion.co.uk

could not be delivered. The problem appears to be :
-- Recipient email address is possibly incorrect

Additional information follows :
-- Unrouteable address

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

From: Postmaster2
Sent: 11 June 2026 17:59
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- shut_the_system_info@proton.me

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <shut_the_system_info@proton.me>: Recipient address rejected: Recipient mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

From: Postmaster2
Sent: 11 June 2026 17:59
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- enquiries@extinctionrebellion.co.uk

could not be delivered. The problem appears to be :
-- Recipient email address is possibly incorrect

Additional information follows :
-- Unrouteable address

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

From: Postmaster2
Sent: 11 June 2026 18:10
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- shut_the_system_info@proton.me

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <shut_the_system_info@proton.me>: Recipient address rejected: Recipient mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

From: Postmaster2
Sent: 11 June 2026 18:11
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- enquiries@extinctionrebellion.co.uk

could not be delivered. The problem appears to be :
-- Recipient email address is possibly incorrect

Additional information follows :
-- Unrouteable address

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

From: Postmaster2
Sent: 11 June 2026 18:12
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- enquiries@extinctionrebellion.co.uk

could not be delivered. The problem appears to be :
-- Recipient email address is possibly incorrect

Additional information follows :
-- Unrouteable address

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

From: Postmaster2
Sent: 11 June 2026 18:12
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- shut_the_system_info@proton.me

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <shut_the_system_info@proton.me>: Recipient address rejected: Recipient mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW6

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

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002473

NOTICE OF INJUNCTION REVIEW HEARING - 2026

TO: Persons Unknown whose purpose is or includes protesting about fossil fuels or the environment who enter or remain on the premises at Birmingham Airport shown edged red on plan 1 to the Amended Claim Form (whether in connection with the Just Stop Oil campaign or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

Notice is hereby given that a hearing to review the injunction in this action will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026.

The Judge and time of the hearing will be confirmed on the working day before the hearing 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

Copies of relevant documents may be viewed at:

https://corporate.birminghamairport.co.uk/injunction/

Copies of the relevant documents may also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

Birmingham Airport Limited

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002473

NOTICE OF INJUNCTION REVIEW HEARING - 2026

TO: Persons Unknown whose purpose is or includes protesting about fossil fuels or the environment who enter or remain on the premises at Bristol Airport shown edged red on plan 3 to the Amended Claim Form (whether in connection with the Just Stop Oil campaign or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

Notice is hereby given that a hearing to review the injunction in this action will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026.

The Judge and time of the hearing will be confirmed by 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

Copies of relevant documents may be viewed at:

https://www.bristolairport.co.uk/corporate/about-us/our-policies/injunction/

Copies of the relevant documents may also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

Bristol Airport Limited

South West Airports Limited

Bristol Airport Developments Limited

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002132

NOTICE OF INJUNCTION REVIEW HEARING - 2026

TO: Persons Unknown whose purpose is or includes protest on the premises at East Midlands Airport shown edged red on plan 3 or on any flight therefrom (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) (the "**Defendants**")

Notice is hereby given that a hearing to review the injunction in this action will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026.

The Judge and time of the hearing will be confirmed by 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

Copies of relevant documents may be viewed at:

https://www.eastmidlandsairport.com/about-us/injunction/

Copies of the relevant documents may also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

East Midlands International Airport Ltd

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002317

NOTICE OF INJUNCTION REVIEW HEARING - 2026

TO: Persons Unknown whose purpose is or includes protesting about fossil fuels or the environment on the premises at Leeds Bradford Airport shown edged red on plan 1 to the Claim Form (whether in connection with the Just Stop Oil campaign or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest about fossil fuels or the environment on those premises (whether in connection with the Just Stop Oil campaign or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

Notice is hereby given that a hearing to review the injunction in this action will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026.

The Judge and time of the hearing will be confirmed on the working day before the hearing 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

Copies of relevant documents may be viewed at:

https://www.leedsbradfordairport.co.uk/injunction

Copies of the relevant documents may also be obtained from the Information Desk or by contacting or Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

Leeds Bradford Airport Limited

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-001765

NOTICE OF INJUNCTION REVIEW HEARING - 2026

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

Notice is hereby given that a hearing to review the injunction in this action will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026.

The Judge and time of the hearing will be confirmed on the working day before the hearing 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

Copies of the relevant documents may be viewed at: www.londoncityairport.co.uk/corporate/corporate-info/reports-and-publications/injunction.

Copies of the relevant documents may also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

London City Airport Ltd

Docklands Aviation Group Ltd

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002473

NOTICE OF INJUNCTION REVIEW HEARING - 2026

TO: Persons Unknown whose purpose is or includes protesting about fossil fuels or the environment who enter or remain on the premises at Liverpool Airport shown edged red on plan 2 to the Amended Claim Form (whether in connection with the Just Stop Oil campaign or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

Notice is hereby given that a hearing to review the injunction in this action will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026.

The Judge and time of the hearing will be confirmed on the working day before the hearing 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

Copies of relevant documents may be viewed at:

https://www.liverpoolairport.com/injunction

Copies of the relevant documents may also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

Liverpool Airport Limited

Peel L&P Investments (North) Limited

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002317

NOTICE OF INJUNCTION REVIEW HEARING - 2026

TO: Persons unknown whose purpose is or includes protesting about fossil fuels or the environment on the premises at London Luton airport shown edged red on plan 2 to the Amended Claim Form (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) and who enter upon those premises; and persons unknown who protest about fossil fuels or the environment on those premises (whether in connection with the Just Stop Oil campaign or extinction rebellion or otherwise) (the "**Defendants**")

Notice is hereby given that a hearing to review the injunction in this action will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026.

The Judge and time of the hearing will be confirmed on the working day before the hearing 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

Copies of relevant documents may be viewed at:

https://www.london-luton.co.uk/corporate/lla-publications/injunction

Copies of the relevant documents may also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

London Luton Airport Operations Limited

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002132

NOTICE OF INJUNCTION REVIEW HEARING

TO: Persons Unknown whose purpose is or includes protest on the premises at Manchester Airport shown edged red on plan 1 or on any flight therefrom (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) (the "**Defendants**")

Notice is hereby given that a hearing to review the injunction in this action will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026.

The Judge and time of the hearing will be confirmed on the working day before the hearing 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

Copies of relevant documents may be viewed at:

https://www.manchesterairport.co.uk/about-us/injunction/

Copies of the relevant documents may also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

Manchester Airport Plc

Airport City (Manchester) Ltd

Manchester Airport Car Park (1) Limited

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002317

NOTICE OF INJUNCTION REVIEW HEARING - 2026

TO: Persons Unknown whose purpose is or includes protesting about fossil fuels or the environment on the premises at Newcastle Airport shown edged red on plan 3 to the Claim Form (whether in connection with the Just Stop Oil campaign or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest about fossil fuels or the environment on those premises (whether in connection with the Just Stop Oil campaign or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

Notice is hereby given that a hearing to review the injunction in this action will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026.

The Judge and time of the hearing will be confirmed on the working day before the hearing 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

Copies of relevant documents may be viewed at:

https://www.newcastleairport.com/corporate/about-us/injunction/

Copies of the relevant documents may also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

Newcastle International Airport Limited

NIAL Services Limited

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002132

NOTICE OF INJUNCTION REVIEW HEARING

TO: Persons Unknown whose purpose is or includes protest on the premises at Stansted Airport shown edged red on plan 2 or on any flight therefrom (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) (the "**Defendants**")

Notice is hereby given that a hearing to review the injunction in this action will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026.

The Judge and time of the hearing will be confirmed on the working day before the hearing 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

Copies of relevant documents may be viewed at:

https://www.stanstedairport.com/about-us/injunction/

Copies of the relevant documents may also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

Stansted Airport Ltd

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW7

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

Wright, Alexander

From: Wright, Alexander
Sent: 16 June 2026 15:12
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion
Subject: RE: Leeds Bradford Airport, London Luton Airport and Newcastle International Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: LBA, LTA and NCL - Order dated 16 June 2026 - KB-2024-2317(252837714.1).pdf; Sealed Application - 2.06.26 - KB-2024-2317 - LBA, LTA and NCL(252840842.1).pdf

To whom it may concern

We write further to the below email, please see attached by way of further service on you:

1. Sealed Application Order dated 2 June 2026; and
2. Sealed Court Order dated 16 June 2026.

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at.

Airport	Action Number	Webpage address
Leeds Bradford Airport	KB-2024-2317	Injunction | Leeds Bradford Airport
London Luton Airport		Injunction | London Luton Airport
Newcastle International Airport		Injunction

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

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www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

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From: Wright, Alexander <AlexWright@eversheds-sutherland.com>
Sent: 12 June 2026 13:14
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion <enquiries@extinctionrebellion.uk>
Subject: Leeds Bradford Airport, London Luton Airport and Newcastle International Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)

To whom it may concern

We write further to the first review hearing heard by Bourne J on 24 June 2025, in respect of the injunctions granted in these proceedings by Order dated 19 July 2024 by Ritchie J.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of Leeds Bradford Airport;
2. Notice of Hearing in respect of London Luton Airport;
3. Notice of Hearing in respect of Newcastle International Airport;
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed also.

Airport	**Action Number**	**Webpage address**
Leeds Bradford Airport	KB-2024-2317	Injunction | Leeds Bradford Airport
London Luton Airport		Injunction | London Luton Airport
Newcastle International Airport		Injunction

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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www.eversheds-sutherland.com

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Helping our clients, our people and our communities to thrive

Wright, Alexander

From: Wright, Alexander
Sent: 16 June 2026 15:08
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion
Subject: RE: Manchester Airport, Stansted Airport and East Midlands Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: MAN, STN and EMA - Order dated 15 June 2026 - KB-2024-2132(252839389.1).pdf; Sealed Application - 02.06.26 - KB-2024-2132 - MAN, STN and EMA(252843295.1).pdf

To whom it may concern

We write further to the below email, please see attached by way of further service on you:

1. Sealed Application Order dated 2 June 2026; and
2. Sealed Court Order dated 15 June 2026.

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at.

Airport	Action Number	Webpage address
Manchester Airport	KB-2024-2132	Injunction | Manchester Airport
Stansted Airport		London Stansted Airport Injunction | London Stanste
East Midlands Airport		Injunction | East Midlands Airport

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

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www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

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Helping our clients, our people and our communities to thrive

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From: Wright, Alexander <AlexWright@eversheds-sutherland.com>
Sent: 11 June 2026 17:58
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me
Subject: Manchester Airport, Stansted Airport and East Midlands Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)

To whom it may concern

We write further in respect of the above proceedings and following the first review hearing heard by Bourne J on 24 June 2025, in respect of the injunctions granted in these proceedings by Order dated 5 July 2024 by HHJ Coe KC.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of Manchester Airport;
2. Notice of Hearing in respect of Stanstead Airport;
3. Notice of Hearing in respect of East Midlands Airport;
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed also.

Airport	**Action Number**	**Webpage address**
Manchester Airport	KB-2024-2132	Injunction | Manchester Airport
Stansted Airport		London Stansted Airport Injunction | London Stanste
East Midlands Airport		Injunction | East Midlands Airport

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

T: +44 161 831 8582
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www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland
Helping our clients, our people and our communities to thrive

Wright, Alexander

From: Wright, Alexander
Sent: 16 June 2026 15:03
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion
Subject: RE: Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: Sealed Application - 2.06.26 - KB-2024-002473 - BHX, LJLA and BRS(252840843.1).pdf; BHX, LJLA and BRS - Order dated 16 June 2026 - KB-2024-2473(252825781.1).pdf

To whom it may concern

We write further to the below email, please see attached by way of further service on you:

1. Sealed Application Order dated 2 June 2026; and
2. Sealed Court Order dated 16 June 2026.

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at.

Airport	Action Number	Webpage address
Birmingham Airport	KB-2024-2473	Injunction | Birmingham Airport Website
Liverpool John Lennon Airport		Liverpool John Lennon Airport
Bristol Airport		Bristol Airport Injunction

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

T: +44 161 831 8582
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www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland
Helping our clients, our people and our communities to thrive

---

From: Wright, Alexander <AlexWright@eversheds-sutherland.com>
Sent: 11 June 2026 18:12
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion <enquiries@extinctionrebellion.uk>
Subject: Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)

To whom it may concern

We write further to the first review hearing heard by Bourne J on 24 June 2025, in respect of the injunctions granted in these proceedings by Order dated 6 August 2024 by Jacobs J.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of Birmingham Airport;
2. Notice of Hearing in respect of Liverpool John Lennon Airport;
3. Notice of Hearing in respect of Bristol Airport;
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed also.

Airport	**Action Number**	**Webpage address**
Birmingham Airport	KB-2024-2473	Injunction | Birmingham Airport Website
Liverpool John Lennon Airport		Liverpool John Lennon Airport
Bristol Airport		Bristol Airport Injunction

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland
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Wright, Alexander

From: Wright, Alexander
Sent: 11 June 2026 18:10
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion
Subject: London City Airport - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: Witness Statement - Alex Wright - 11.06.26 - LCY - KB-2024-001765(252715475.1).pdf; You've been sent large files; Sealed Application - 2.06.26 - KB-2024-1765 - LCY(252729203.1).pdf; Sealed Order - LCY - 10.06.26(252729207.1).pdf; LCY - Notice of Hearing(252667499.1).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.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of London City Airport;
2. Sealed Application Order dated 2 June 2026;
3. Sealed Court Order dated 10 June 2026
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at the below website.

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

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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Helping our clients, our people and our communities to thrive

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW8

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

Wright, Alexander

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 11 June 2026 18:12
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- shut_the_system_info@proton.me

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <shut_the_system_info@proton.me>: Recipient address rejected: Recipient mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Wright, Alexander

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 16 June 2026 15:13
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- shut_the_system_info@proton.me

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <shut_the_system_info@proton.me>: Recipient address rejected: Recipient mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Wright, Alexander

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 16 June 2026 15:09
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- enquiries@extinctionrebellion.co.uk

could not be delivered. The problem appears to be :
-- Recipient email address is possibly incorrect

Additional information follows :
-- Unrouteable address

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Wright, Alexander

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 16 June 2026 15:09
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- shut_the_system_info@proton.me

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <shut_the_system_info@proton.me>: Recipient address rejected: Recipient mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Wright, Alexander

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 16 June 2026 15:04
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- enquiries@extinctionrebellion.co.uk

could not be delivered. The problem appears to be :
-- Recipient email address is possibly incorrect

Additional information follows :
-- Unrouteable address

This condition occurred after 2 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Wright, Alexander

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 16 June 2026 15:03
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- shut_the_system_info@proton.me

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <shut_the_system_info@proton.me>: Recipient address rejected: Recipient mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Wright, Alexander

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 11 June 2026 18:12
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- enquiries@extinctionrebellion.co.uk

could not be delivered. The problem appears to be :
-- Recipient email address is possibly incorrect

Additional information follows :
-- Unrouteable address

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Wright, Alexander

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 16 June 2026 15:13
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- shut_the_system_info@proton.me

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <shut_the_system_info@proton.me>: Recipient address rejected: Recipient mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW9

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

Wright, Alexander

From: Wright, Alexander
Sent: 19 June 2026 15:49
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion
Subject: RE: Leeds Bradford Airport, London Luton Airport and Newcastle International Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: LBA_LTN_NCL - Sealed Application Dated 18.06.26(252989877.1).pdf; Leeds Bradford Airport Ltd and Others v PU. Draft order. KB-2024-002137(252990688.1).pdf; KB-2024-002317 Leeds Bradford Airport Limited and others -v- Unknown and others

To whom it may concern

We write further to the below email, please see attached by way of further service on you:

1. Sealed Application Notice dated 18 June 2026 and accompanying documents;
2. Draft Order; and
3. Listing Notice of Second Annual Review Hearing on 30 June 2026.

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at.

Airport	Action Number	Webpage address
Leeds Bradford Airport	KB-2024-2317	Injunction | Leeds Bradford Airport
London Luton Airport		Injunction | London Luton Airport
Newcastle International Airport		Injunction

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

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M: +44 7500 578 620
www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland
Helping our clients, our people and our communities to thrive

---

From: Wright, Alexander <AlexWright@eversheds-sutherland.com>
Sent: 16 June 2026 15:12
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion <enquiries@extinctionrebellion.uk>
Subject: RE: Leeds Bradford Airport, London Luton Airport and Newcastle International Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)

To whom it may concern

We write further to the below email, please see attached by way of further service on you:

1. Sealed Application Order dated 2 June 2026; and
2. Sealed Court Order dated 16 June 2026.

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at.

Airport	Action Number	Webpage address
Leeds Bradford Airport	KB-2024-2317	Injunction | Leeds Bradford Airport
London Luton Airport		Injunction | London Luton Airport
Newcastle International Airport		Injunction

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

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www.eversheds-sutherland.com

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From: Wright, Alexander <AlexWright@eversheds-sutherland.com>
Sent: 12 June 2026 13:14
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion <enquiries@extinctionrebellion.uk>
Subject: Leeds Bradford Airport, London Luton Airport and Newcastle International Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)

To whom it may concern

We write further to the first review hearing heard by Bourne J on 24 June 2025, in respect of the injunctions granted in these proceedings by Order dated 19 July 2024 by Ritchie J.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of Leeds Bradford Airport;
2. Notice of Hearing in respect of London Luton Airport;
3. Notice of Hearing in respect of Newcastle International Airport;
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed also.

Airport	Action Number	Webpage address
Leeds Bradford Airport	KB-2024-2317	Injunction | Leeds Bradford Airport
London Luton Airport		Injunction | London Luton Airport
Newcastle International Airport		Injunction

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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www.linkedin.com/in/alexwrighteversheds

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Wright, Alexander

From: Wright, Alexander
Sent: 19 June 2026 15:50
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion
Subject: RE: London City Airport - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: LCY - Sealed Application Dated 18.06.26(252990073.1).pdf; London City Airport Limited v PU. Draft order. KB-2024-001765(252990616.1).pdf; KB-2024-001765 London City Airport Limited and another -v- Unknown

To whom it may concern

We write further to the below email, please see attached by way of further service on you:

1. Sealed Application Notice dated 18 June 2026 and accompanying documents;
2. Draft Order; and
3. Listing Notice of Second Annual Review Hearing on 30 June 2026.

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at.

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

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

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www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

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---

From: Wright, Alexander <AlexWright@eversheds-sutherland.com>
Sent: 12 June 2026 15:51
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion <enquiries@extinctionrebellion.uk>
Subject: RE: London City Airport - Notice of Second Annual Review Hearing (30 June 2026)

To whom it may concern

Further to our below email, please see attached by way of service an updated version of the Exhibits to the First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email)

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

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www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland
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---

From: Wright, Alexander
Sent: 11 June 2026 18:10
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion <enquiries@extinctionrebellion.uk>
Subject: London City Airport - Notice of Second Annual Review Hearing (30 June 2026)

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.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of London City Airport;
2. Sealed Application Order dated 2 June 2026;
3. Sealed Court Order dated 10 June 2026
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at the below website.

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

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland
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Wright, Alexander

From: Wright, Alexander
Sent: 19 June 2026 15:51
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion
Subject: RE: Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: BHX_LJLA_BRS - Sealed Application Dated 18.06.26(252989673.1).pdf; Birmingham Airport Ltd and Others v PU. Draft order. KB-2024-002473(252990670.1).pdf; KB-2024-002473 Birmingham Airport Limited and others -v- Unknown and others

To whom it may concern

We write further to the below email, please see attached by way of further service on you:

1. Sealed Application Notice dated 18 June 2026 and accompanying documents;
2. Draft Order; and
3. Listing Notice of Second Annual Review Hearing on 30 June 2026.

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at.

Airport	Action Number	Webpage address
Birmingham Airport	KB-2024-2473	Injunction | Birmingham Airport Website
Liverpool John Lennon Airport		Liverpool John Lennon Airport
Bristol Airport		Bristol Airport Injunction

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

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www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland
Helping our clients, our people and our communities to thrive

---

From: Wright, Alexander <AlexWright@eversheds-sutherland.com>
Sent: 16 June 2026 15:03
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion <enquiries@extinctionrebellion.uk>
Subject: RE: Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)

To whom it may concern

We write further to the below email, please see attached by way of further service on you:

1. Sealed Application Order dated 2 June 2026; and
2. Sealed Court Order dated 16 June 2026.

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at.

Airport	Action Number	Webpage address
Birmingham Airport	KB-2024-2473	Injunction | Birmingham Airport Website
Liverpool John Lennon Airport		Liverpool John Lennon Airport
Bristol Airport		Bristol Airport Injunction

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

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www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland
Helping our clients, our people and our communities to thrive

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From: Wright, Alexander <AlexWright@eversheds-sutherland.com>
Sent: 11 June 2026 18:12
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion <enquiries@extinctionrebellion.uk>
Subject: Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)

To whom it may concern

We write further to the first review hearing heard by Bourne J on 24 June 2025, in respect of the injunctions granted in these proceedings by Order dated 6 August 2024 by Jacobs J.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of Birmingham Airport;
2. Notice of Hearing in respect of Liverpool John Lennon Airport;
3. Notice of Hearing in respect of Bristol Airport;
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed also.

Airport	Action Number	Webpage address
Birmingham Airport	KB-2024-2473	Injunction | Birmingham Airport Website
Liverpool John Lennon Airport		Liverpool John Lennon Airport
Bristol Airport		Bristol Airport Injunction

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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M: +44 7500 578 620
www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland
Helping our clients, our people and our communities to thrive

Wright, Alexander

From: Wright, Alexander
Sent: 19 June 2026 15:49
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion
Subject: RE: Manchester Airport, Stansted Airport and East Midlands Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)
Attachments: Manchester Airport plc and Others v PU. Draft minute of order. KB-2024-002132(252990757.1).pdf; MAG, STN and EMA - Sealed Application Dated 18.06.26(252989800.1).pdf; KB-2024-002132 Manchester Airport PLC and others -v- Unknown and others

To whom it may concern

We write further to the below email, please see attached by way of further service on you:

1. Sealed Application Notice dated 18 June 2026 and accompanying documents;
2. Draft Order; and
3. Listing Notice of Second Annual Review Hearing on 30 June 2026.

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at.

Airport	Action Number	Webpage address
Manchester Airport	KB-2024-2132	Injunction | Manchester Airport
Stansted Airport		London Stansted Airport Injunction | London Stanste
East Midlands Airport		Injunction | East Midlands Airport

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

T: +44 161 831 8582
M: +44 7500 578 620
www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland
Helping our clients, our people and our communities to thrive

---

From: Wright, Alexander <AlexWright@eversheds-sutherland.com>
Sent: 16 June 2026 15:08
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me; Extinction Rebellion <enquiries@extinctionrebellion.uk>
Subject: RE: Manchester Airport, Stansted Airport and East Midlands Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)

To whom it may concern

We write further to the below email, please see attached by way of further service on you:

1. Sealed Application Order dated 2 June 2026; and
2. Sealed Court Order dated 15 June 2026.

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed at.

Airport	Action Number	Webpage address
Manchester Airport	KB-2024-2132	Injunction | Manchester Airport
Stansted Airport		London Stansted Airport Injunction | London Stanste
East Midlands Airport		Injunction | East Midlands Airport

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

T: +44 161 831 8582
M: +44 7500 578 620
www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland
Helping our clients, our people and our communities to thrive

---

From: Wright, Alexander <AlexWright@eversheds-sutherland.com>
Sent: 11 June 2026 17:58
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com; info@takebackpower.net; press@takebackpower.net; shut_the_system_info@proton.me; campaigner@fossilfreelondon.org; operations@fossilfreelondon.org; YouthDemandPress@protonmail.com; youthdemand@proton.me
Subject: Manchester Airport, Stansted Airport and East Midlands Airport Injunction - Notice of Second Annual Review Hearing (30 June 2026)

To whom it may concern

We write further in respect of the above proceedings and following the first review hearing heard by Bourne J on 24 June 2025, in respect of the injunctions granted in these proceedings by Order dated 5 July 2024 by HHJ Coe KC.

Notice is hereby given that the second annual review hearing in respect of such injunctions will take place at The Royal Courts of Justice, Strand, London WC2A 2LL on 30 June 2026. The Judge and time of the hearing will be confirmed on the working day before the hearing 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

The following documents are attached to this email, by way of service:

1. Notice of Hearing in respect of Manchester Airport;
2. Notice of Hearing in respect of Stanstead Airport;
3. Notice of Hearing in respect of East Midlands Airport;
4. First Witness Statement of Alex Wright dated 11 June 2026; and
5. Exhibits to First Witness Statement of Alex Wright dated 11 June 2026 (downloadable via the attached email).

A copy of such documents, together with a copy of all documents applicable to these proceedings can also be viewed also.

Airport	Action Number	Webpage address
Manchester Airport	KB-2024-2132	Injunction | Manchester Airport
Stansted Airport		London Stansted Airport Injunction | London Stanste
East Midlands Airport		Injunction | East Midlands Airport

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

T: +44 161 831 8582
M: +44 7500 578 620
www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland
Helping our clients, our people and our communities to thrive

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW10

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

Wright, Alexander

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 June 2026 15:52
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- shut_the_system_info@proton.me

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <shut_the_system_info@proton.me>: Recipient address rejected: Recipient mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Wright, Alexander

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 June 2026 15:51
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- enquiries@extinctionrebellion.co.uk

could not be delivered. The problem appears to be :
-- Recipient email address is possibly incorrect

Additional information follows :
-- Unrouteable address

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Wright, Alexander

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 June 2026 15:50
To: Wright, Alexander
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- enquiries@extinctionrebellion.co.uk

could not be delivered. The problem appears to be :
-- Recipient email address is possibly incorrect

Additional information follows :
-- Unrouteable address

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-- enquiries@extinctionrebellion.co.uk

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-- Recipient email address is possibly incorrect

Additional information follows :
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Subject: [Postmaster] Email Delivery Failure
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This is a delivery failure notification message indicating that an email you addressed to email address :
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could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <shut_the_system_info@proton.me>: Recipient address rejected: Recipient mailbox quota exceeded

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This is a delivery failure notification message indicating that an email you addressed to email address :
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could not be delivered. The problem appears to be :
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Additional information follows :
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CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW11

This is the exhibit marked "AJW11" in the witness statement of Alexander James Wright.

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-001765

NOTICE OF APPLICATION DATED 18 JUNE 2026

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

Notice is hereby given that an application, dated 18 June 2026, has been made to amend the Claim Form and Particulars of Claim in these proceedings.

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

1. be viewed at: https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction; and

2. also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

London City Airport Ltd

Docklands Aviation Group Ltd

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002317

NOTICE OF APPLICATION DATED 18 JUNE 2026

TO: Persons unknown whose purpose is or includes protesting about fossil fuels or the environment on the premises at London Luton airport shown edged red on plan 2 to the Amended Claim Form (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) and who enter upon those premises; and persons unknown who protest about fossil fuels or the environment on those premises (whether in connection with the Just Stop Oil campaign or extinction rebellion or otherwise) (the "**Defendants**")

Notice is hereby given that an application, dated 18 June 2026, has been made to amend the Claim Form and Particulars of Claim in these proceedings.

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

1. be viewed at: https://www.london-luton.co.uk/corporate/lla-publications/injunction

2. also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

London Luton Airport Operations Limited

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002132

NOTICE OF APPLICATION DATED 18 JUNE 2026

TO: Persons Unknown whose purpose is or includes protest on the premises at Manchester Airport shown edged red on plan 1 or on any flight therefrom (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) (the "**Defendants**")

Notice is hereby given that an application, dated 18 June 2026, has been made to amend the Particulars of Claim in these proceedings.

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

1. be viewed at: https://www.manchesterairport.co.uk/about-us/injunction/

2. also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

Manchester Airport Plc

Airport City (Manchester) Ltd

Manchester Airport Car Park (1) Limited

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002317

NOTICE OF APPLICATION DATED 18 JUNE 2026

TO: Persons Unknown whose purpose is or includes protesting about fossil fuels or the environment on the premises at Newcastle Airport shown edged red on plan 3 to the Claim Form (whether in connection with the Just Stop Oil campaign or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest about fossil fuels or the environment on those premises (whether in connection with the Just Stop Oil campaign or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

Notice is hereby given that an application, dated 18 June 2026, has been made to amend the Claim Form and Particulars of Claim in these proceedings.

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

1. be viewed at: https://www.newcastleairport.com/corporate/about-us/injunction/

2. also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

Newcastle International Airport Limited

NIAL Services Limited

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002132

NOTICE OF APPLICATION DATED 18 JUNE 2026

TO: Persons Unknown whose purpose is or includes protest on the premises at Stansted Airport shown edged red on plan 2 or on any flight therefrom (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) (the "**Defendants**")

Notice is hereby given that an application, dated 18 June 2026, has been made to amend the Particulars of Claim in these proceedings.

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

1. be viewed at: https://www.stanstedairport.com/about-us/injunction/

2. also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

Stansted Airport Ltd

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002132

NOTICE OF APPLICATION DATED 18 JUNE 2026

TO: Persons Unknown whose purpose is or includes protest on the premises at East Midlands Airport shown edged red on plan 3 or on any flight therefrom (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil campaign or Extinction Rebellion or otherwise) (the "**Defendants**")

Notice is hereby given that an application, dated 18 June 2026, has been made to amend the Particulars of Claim in these proceedings.

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

1. be viewed at: https://www.eastmidlandsairport.com/about-us/injunction/

2. also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

East Midlands International Airport Ltd

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002317

NOTICE OF APPLICATION DATED 18 JUNE 2026

TO: Persons Unknown whose purpose is or includes protesting about fossil fuels or the environment on the premises at Leeds Bradford Airport shown edged red on plan 1 to the Claim Form (whether in connection with the Just Stop Oil campaign or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest about fossil fuels or the environment on those premises (whether in connection with the Just Stop Oil campaign or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

Notice is hereby given that an application, dated 18 June 2026 has been made to amend the Claim Form and Particulars of Claim in these proceedings.

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

1. be viewed at: https://www.leedsbradfordairport.co.uk/injunction

2. also be obtained from the Information Desk or by contacting Alex Wright of Eversheds Sutherland by email: alexwright@eversheds-sutherland.com

Leeds Bradford Airport Limited

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW12

This is the exhibit marked "AJW12" in the witness statement of Alexander James Wright.

N244

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 The High Court of Justice, Kings Bench Division	**Claim no.** KB-2024-001765
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
PBA0087211	H W F – –
Warrant no. (if applicable)	
Claimant's name (including ref.) London City Airport Ltd and another	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	17.06.25

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.

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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.

The Claimant applies for:-

Permission to amend the Claim Form and the annexed Plan 1 to exclude a defined area of land that was previously within the Claimants control but has since been leased to a third party and is no longer within its possession. The circumstances of the new lease are referred to in the witness statement of Stuart Sherbrooke Wortley dated 06.06.25.

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
1 7	0 6	2 0 2 5

Full name

Emma Payne

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

Paralegal

Applicant'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	V	2	7	W	S

If applicable

Phone number

Fax phone number

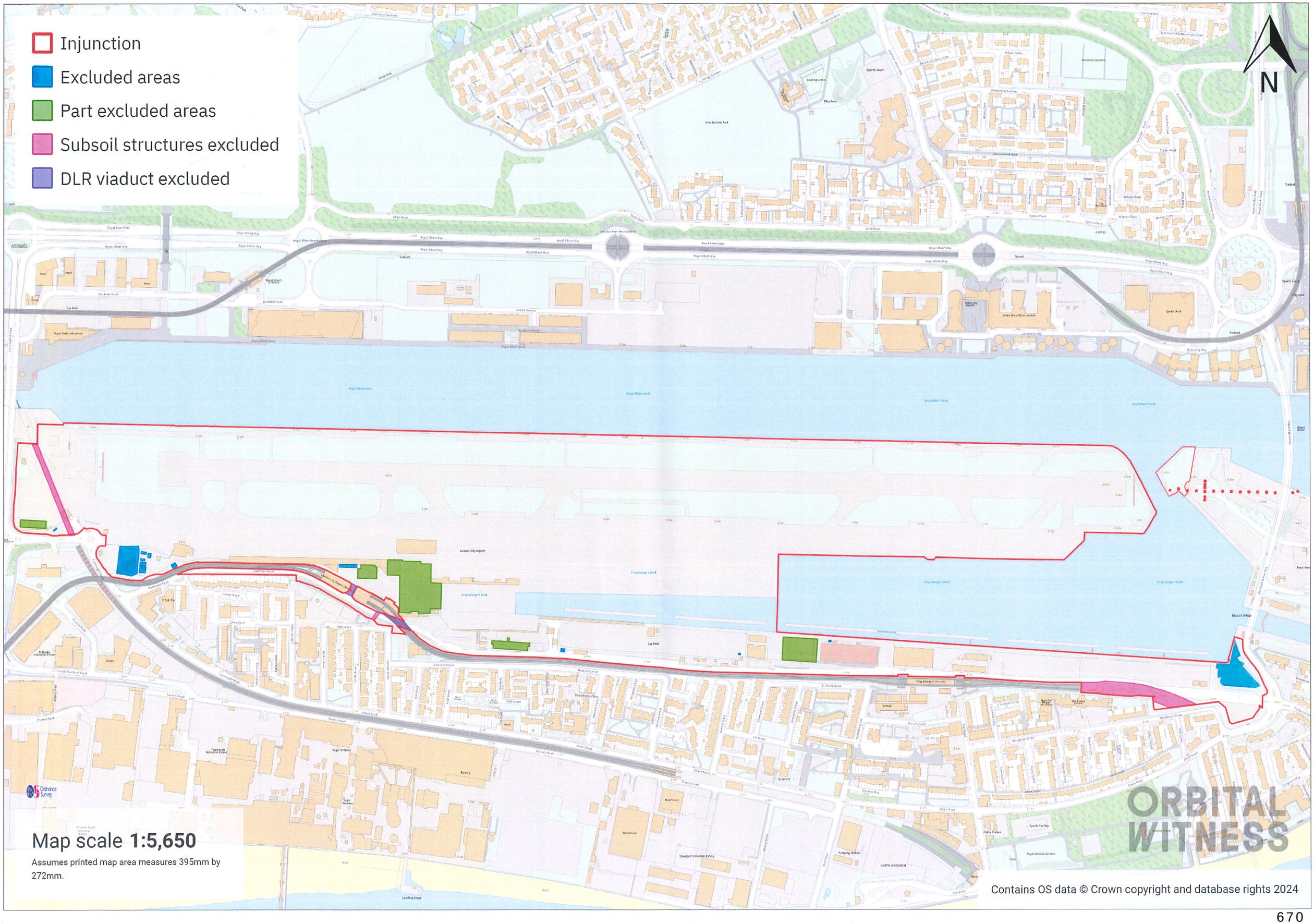
DX number

Your Ref.

2926599.000057

Email

emmapayne@eversheds-sutherland.com


Injunction
Excluded areas
Part excluded areas
Subsoil structures excluded
DLR viaduct excluded
N
Map scale 1:5,650
Assumes printed map area measures 395mm by 272mm.
Ordnance Survey
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

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(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
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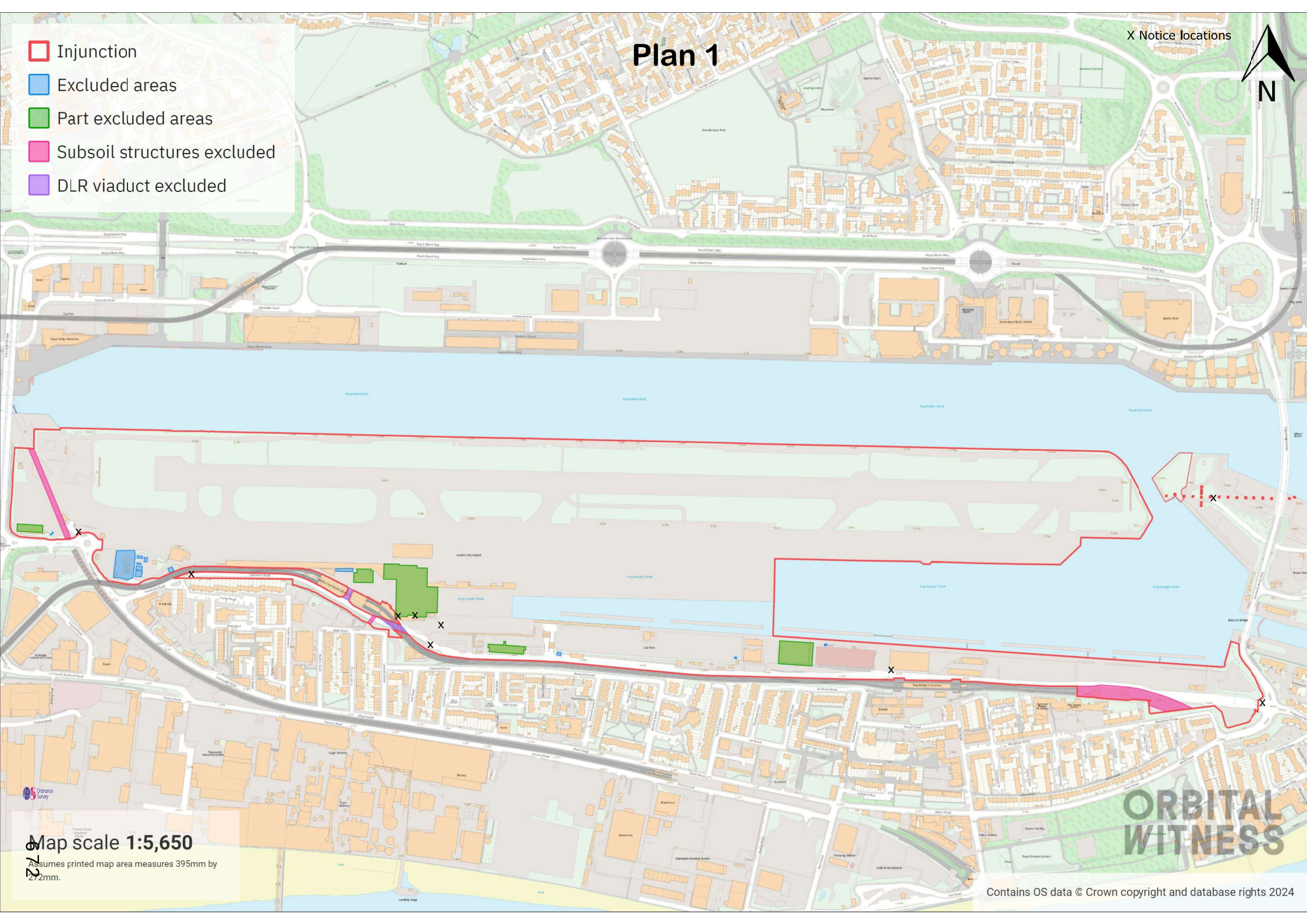
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW13

This is the exhibit marked "AJW13" in the witness statement of Alexander James Wright.


Plan 1
Injunction
Excluded areas
Part excluded areas
Subsoil structures excluded
DLR viaduct excluded
X Notice locations
N
Map scale 1:5,650
Assumes printed map area measures 395mm by 272mm.
Contains OS data © Crown copyright and database rights 2024
ORBITAL WITNESS

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

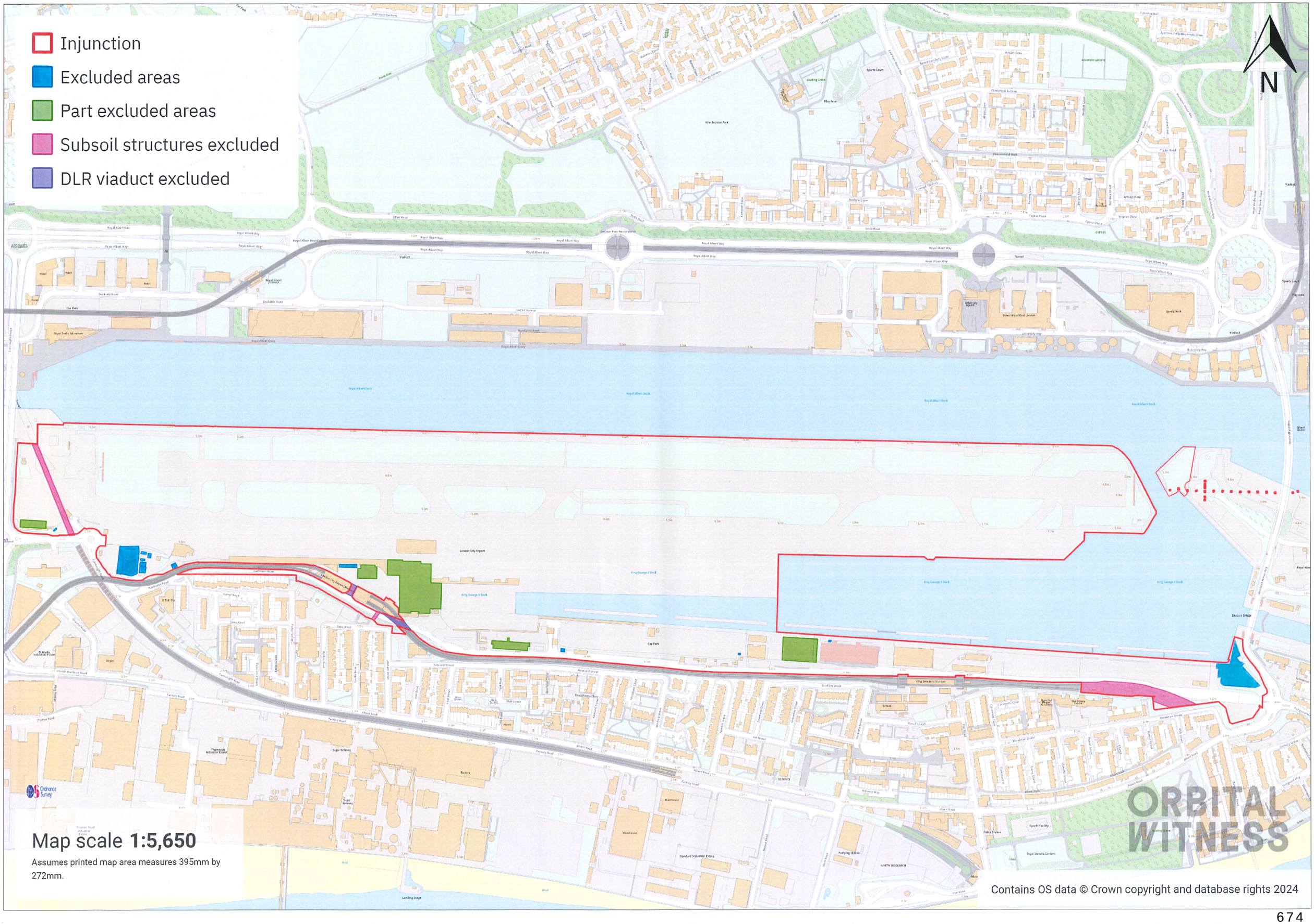
(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW14

This is the exhibit marked "AJW14" in the witness statement of Alexander James Wright.


Injunction
Excluded areas
Part excluded areas
Subsoil structures excluded
DLR viaduct excluded
N
Map scale 1:5,650
Assumes printed map area measures 395mm by 272mm.
Contains OS data © Crown copyright and database rights 2024
ORBITAL WITNESS

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW15

This is the exhibit marked "AJW15" in the witness statement of Alexander James Wright.

Clifford, Meghan

From: Evie Barden <EBarden@landmarkchambers.co.uk>
Sent: 27 June 2025 13:29
To: Waite, Samantha | She/Hers
Subject: Re: London City Airport Limited and ors -v- Persons Unknown
Attachments: London City Airport Limited v PU. Draft minute of order. KB-2024-001765.docx

Dear Samanatha

I've also managed to reduce the file size in the Word document – please now find that attached.

Evie

From: Evie Barden <EBarden@landmarkchambers.co.uk>
Date: Friday, 27 June 2025 at 13:18
To: Waite, Samantha | She/Hers <Samantha.Waite@justice.gov.uk>
Subject: Re: London City Airport Limited and ors -v- Persons Unknown

Hi Samantha

I've saved the draft as a PDF and then compressed the file. Does that help?

Kind regards,

Evie

From: Waite, Samantha | She/Hers <Samantha.Waite@justice.gov.uk>
Date: Friday, 27 June 2025 at 13:08
To: Evie Barden <EBarden@landmarkchambers.co.uk>
Subject: Re: London City Airport Limited and ors -v- Persons Unknown

Dear Evie,

I hope you are well,

The Judge has approved the orders now, however the LCA order is too big to be sent as an attachment, has to be a link. I am going to try and make it work with the court associates, however in the event they can not seal and serve the order, do you have any recommendations? Is it possible to make the pictures smaller? Can it be served in two separate documents? Happy to help where needed.

Kind Regards,
Samantha Waite
Clerk to The Hon. Mr Justice Bourne
Phone: 07860340370 |
Email: samantha.waite@justice.gov.uk
Clerks to HM Judges | HMCTS | Room W315 | Royal Courts of Justice | London | WC2A 2LL

HM Courts & Tribu

Here is how HMCTS uses personal data about you

From: Evie Barden <EBarden@landmarkchambers.co.uk>
Sent: Thursday, June 26, 2025 11:25 AM
To: Waite, Samantha | She/Hers <Samantha.Waite@justice.gov.uk>
Subject: Re: London City Airport Limited and ors -v- Persons Unknown

Thank you very much Samantha.

Best
Evie

From: Waite, Samantha | She/Hers <Samantha.Waite@justice.gov.uk>
Date: Thursday, 26 June 2025 at 11:07
To: Evie Barden <EBarden@landmarkchambers.co.uk>
Subject: RE: London City Airport Limited and ors -v- Persons Unknown

Dear Evie,

Thank you, these are safely received now and I can see your previous email, all of which I will pass on to the Judge.

Kind Regards,
Samantha Waite
Clerk to The Hon. Mr Justice Bourne
Phone: 07860340370 |
Email: samantha.waite@justice.gov.uk
Clerks to HM Judges | HMCTS | Room W315 | Royal Courts of Justice | London | WC2A 2LL

HM Courts & Tribu

Here is how HMCTS uses personal data about you

From: Evie Barden <EBarden@landmarkchambers.co.uk>
Sent: 26 June 2025 10:44
To: Waite, Samantha | She/Hers <Samantha.Waite@justice.gov.uk>
Subject: Re: London City Airport Limited and ors -v- Persons Unknown

Dear Samantha

Can I check whether you received my email below? I had a mail delivery failure notification from your email. In the event that it hasn't come through, please see below. I've now provided the links to the orders, rather than attachments in the hope that works.

Best
Evie

Leeds Bradford Airport Ltd v PU. Draft minute of order. KB-2024-002137.docx Manchester Airport plc v PU. Draft minute of order. KB-2024-002132.docx Birmingham Airport Ltd v PU. Draft minute of order. KB-2024-002473.docx London City Airport Limited v PU. Draft minute of order. KB-2024-001765.docx

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From: Evie Barden <EBarden@landmarkchambers.co.uk>
Date: Thursday, 26 June 2025 at 10:30
To: Waite, Samantha | She/Hers <Samantha.Waite@justice.gov.uk>
Cc: Alexander <alexwright@eversheds-sutherland.com>, Stuart <stuartwortley@eversheds-sutherland.com>, Timothy Morshead KC <TMorshead@landmarkchambers.co.uk>
Subject: Re: London City Airport Limited and ors -v- Persons Unknown

Dear Samantha

I attach four revised orders which hopefully address the judge's concerns below. In respect of the judge's second query, I have altered the wording in para 3 below in the London City Airport draft order so that paragraph 1 reads: "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)." The schedule to the order then contains the Knowles J order as varied with a new plan and paragraph 3 of the body of the order then requires the order to be served in accordance with paragraph 9 of the Knowles J Order, which dealt with service of the order.

Should I be able to assist further, please let me know.

Best,
Evie

From: Waite, Samantha | She/Hers <Samantha.Waite@justice.gov.uk>
Date: Wednesday, 25 June 2025 at 16:19
To: Evie Barden <EBarden@landmarkchambers.co.uk>
Cc: Alexander <alexwright@eversheds-sutherland.com>, Stuart <stuartwortley@eversheds-sutherland.com>, Timothy Morshead KC <TMorshead@landmarkchambers.co.uk>
Subject: Re: London City Airport Limited and ors -v- Persons Unknown

Dear Evie,

Thank you for sending these draft orders. The Judge has some queries I hope you can assist with,

1. Is it a good idea to have 10 orders, rather than 1 order in each of the 4 claims?

2. The London City Airport draft order para 2 refers to amending the claim form. Is it not necessary to refer to amending the plan attached to the Injunction? Does that give rise to a question of re-service?

3. The wording of para 1 of each order doesn't quite work. It needs to be made clear that the previous injunctions continue, which again may suggest a need for service. Compare the wording used in the order following the review in Valero Energy: "The Ritchie Order shall remain in full force and effect (subject to review, as provided for in paragraph 18 of the Ritchie Order)."

Thank you,

Kind Regards,
Samantha Waite
Clerk to The Hon. Mr Justice Bourne

Phone: 07860340370 |
Email: samantha.waite@justice.gov.uk
Clerks to HM Judges | HMCTS | Room W315 | Royal Courts of Justice | London | WC2A 2LL



Here is how HMCTS uses personal data about you

From: Evie Barden <EBarden@landmarkchambers.co.uk>

Sent: Tuesday, June 24, 2025 4:03 PM
To: Ferreira, Valnei | He/His <Valnei.Ferreira1@justice.gov.uk>

Cc: Wright, Alexander <alexwright@eversheds-sutherland.com>; Wortley, Stuart <stuartwortley@eversheds-sutherland.com>; Timothy Morshead KC <TMorshead@landmarkchambers.co.uk>

Subject: London City Airport Limited and ors -v- Persons Unknown

Dear Mr Ferreira

Further to the hearing of these claims before Mr Justice Bourne earlier today, please find attached the draft minutes of order for the court's approval and sealing.

Do let me know if I can assist further.

Kind regards,

Evie Barden

(Junior counsel for the Claimants)

Evie Barden

Pronouns: she/her

dd. +44 (0) 20 7421 1375 |t. +44 (0) 20 7430 1221

www.landmarkchambers.co.uk
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Claim no: KB-2024-001765

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

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

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 24 June 2025

IN THE HIGH COURT OF JUSTICE **CLAIM NO: KB-2024-001765**
KING BENCH DIVISION

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

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:

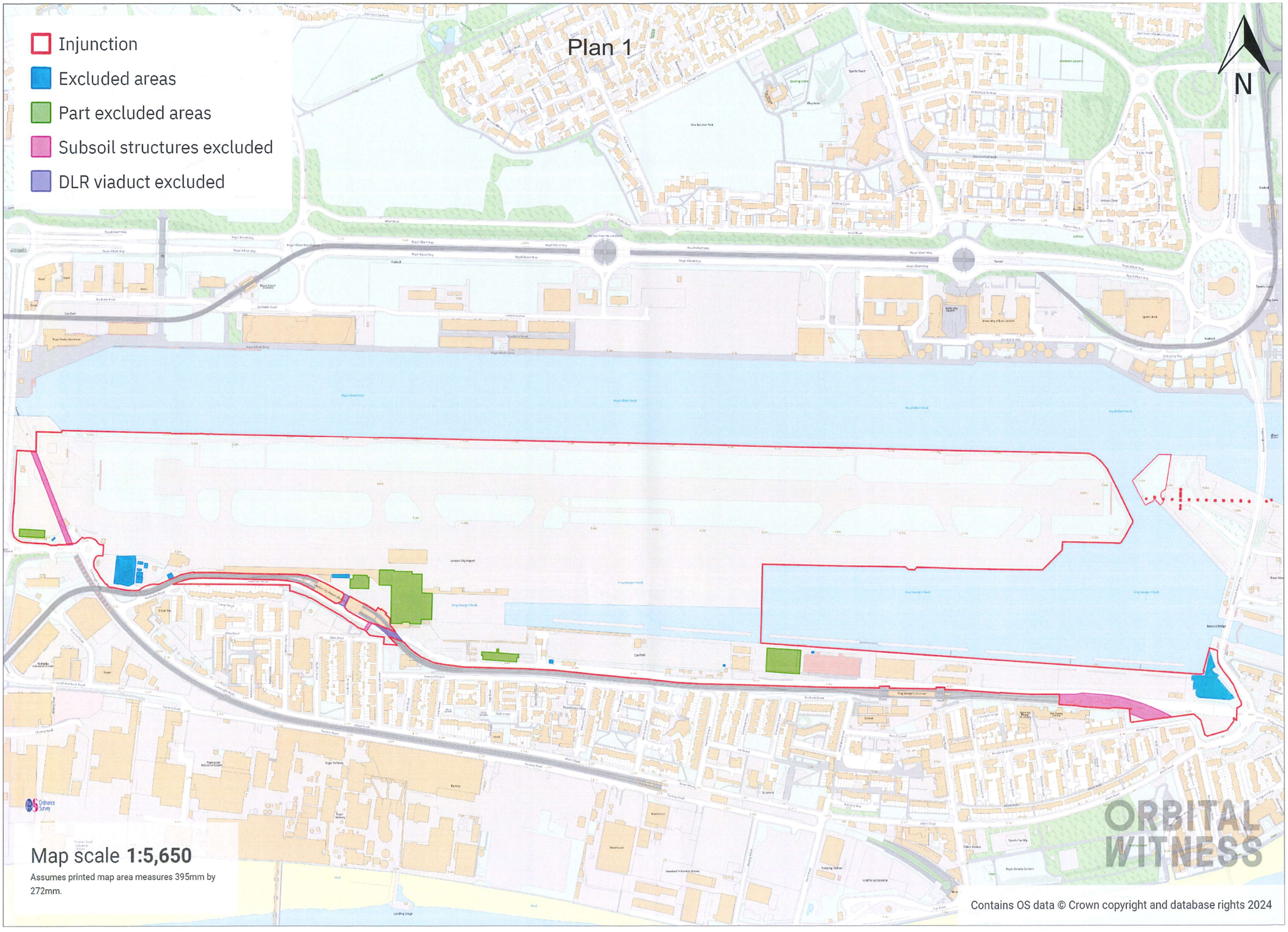
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

Dated: 20 June 2024

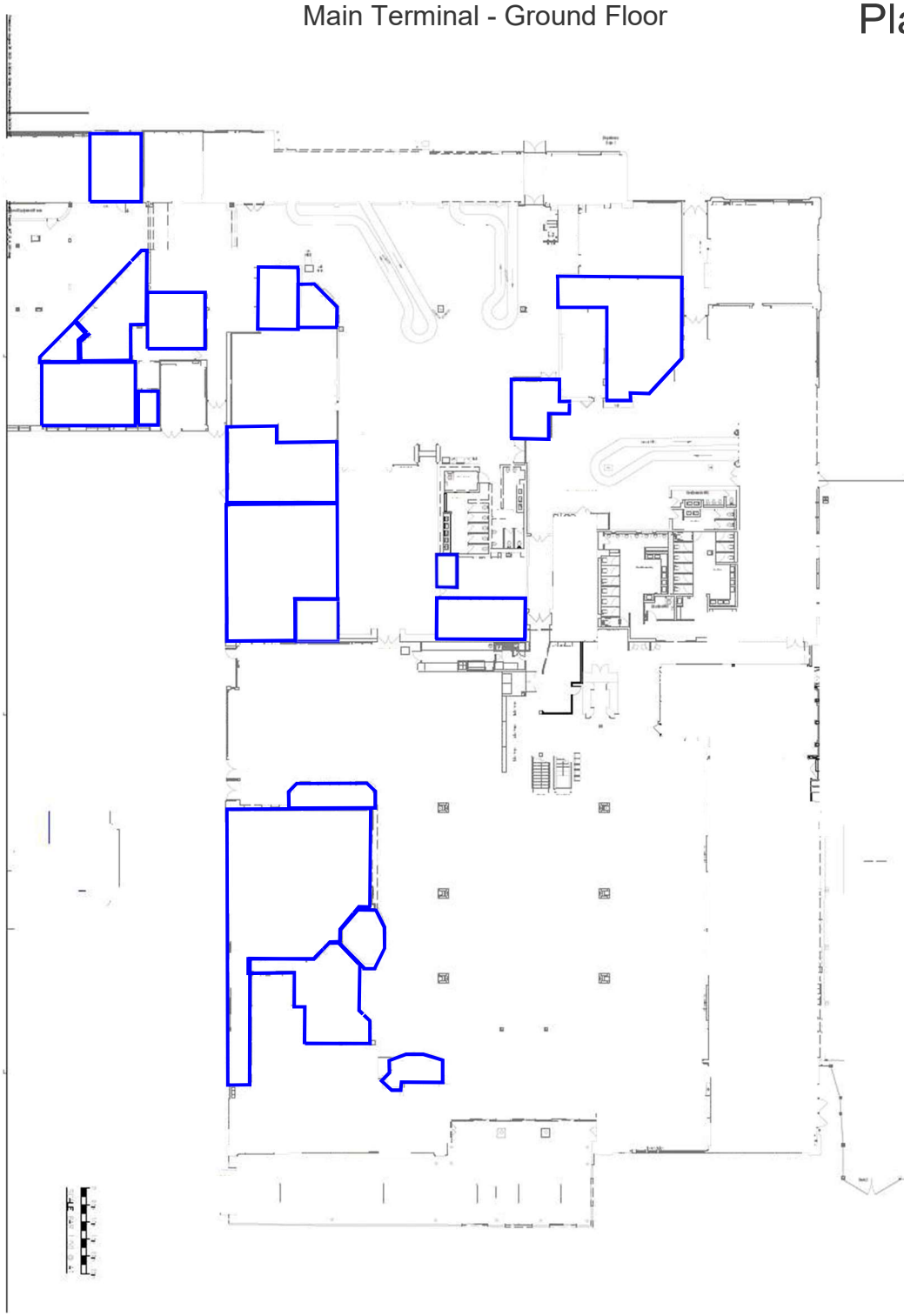
SCHEDULE 1 - PLANS

Plan 1


Injunction
Excluded areas
Part excluded areas
Subsoil structures excluded
DLR viaduct excluded
N
Map scale 1:5,650
Assumes printed map area measures 395mm by 272mm.
Contains OS data © Crown copyright and database rights 2024
ORBITAL WITNESS

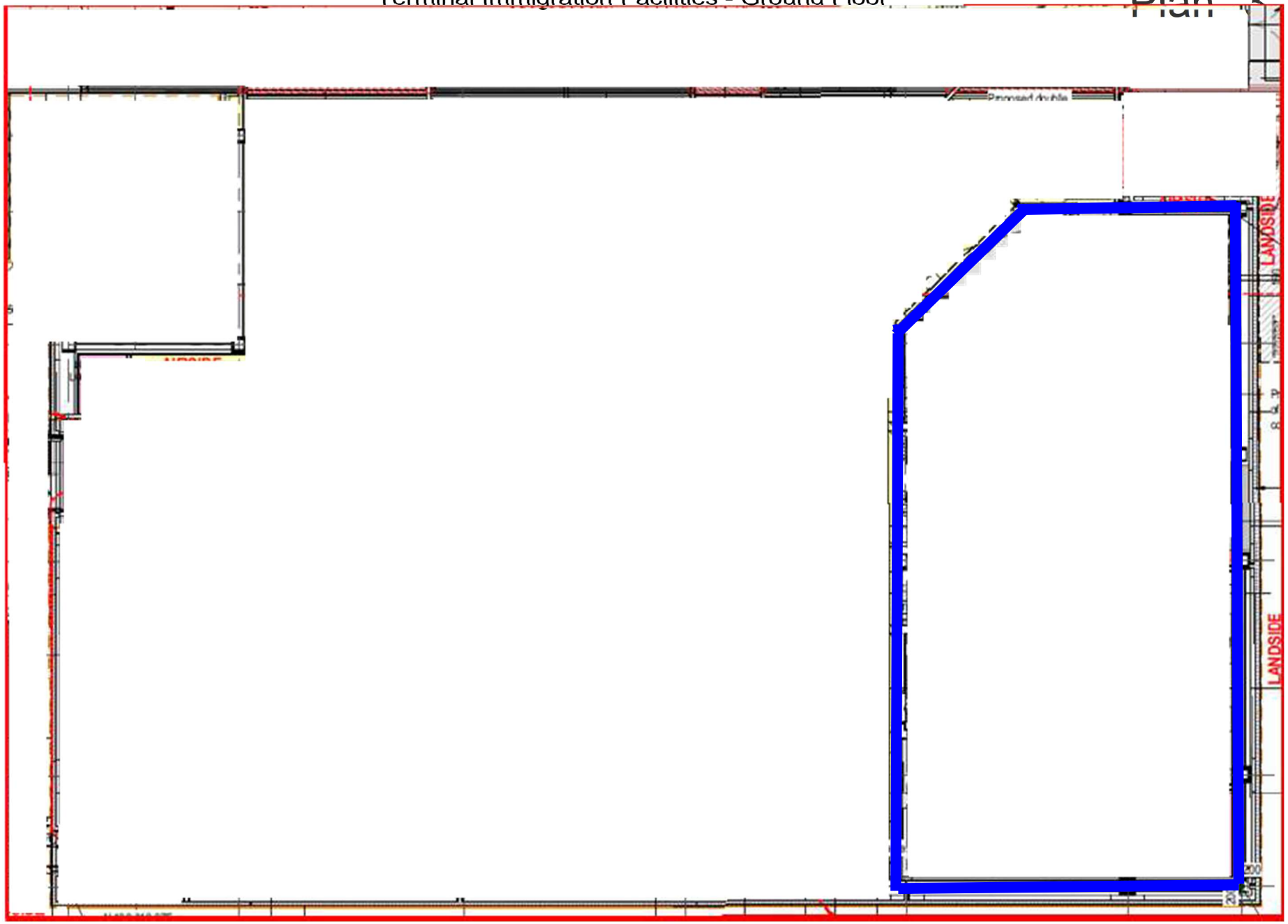
Main Terminal - Ground Floor

Pl



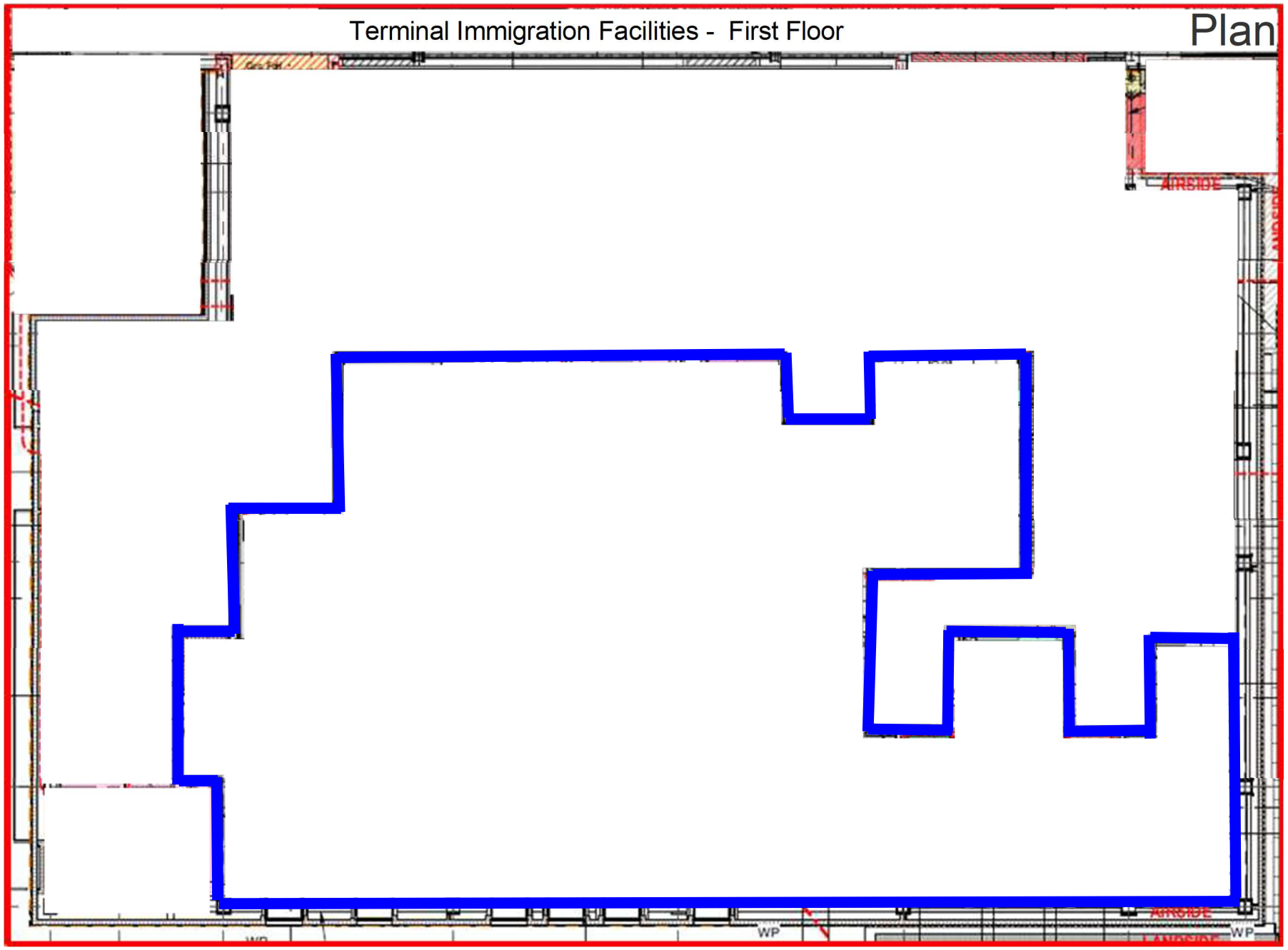
Terminal Immigration Facilities - Ground Floor

Plan 3



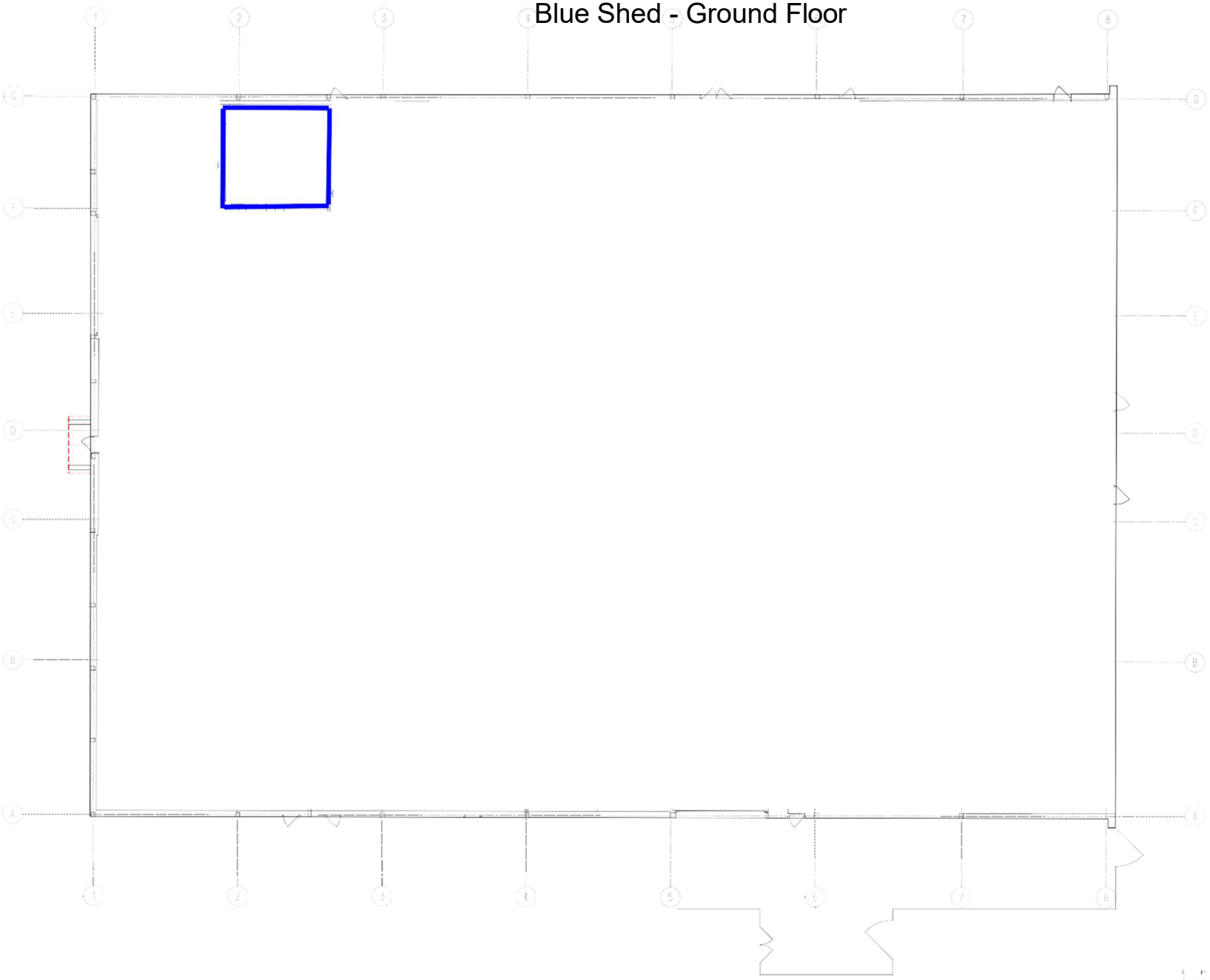
Terminal Immigration Facilities - First Floor

Plan 4



Plan 5

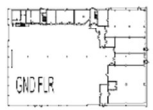
Blue Shed - Ground Floor



DO NOT SCALE - IF IN DOUBT ASK
Associated Drawings

General Notes.

B	Room Numbers Added	01/11/18
A	Door Numbers Added	01/08/18



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

RECORD DRAWING

BLUE SHED

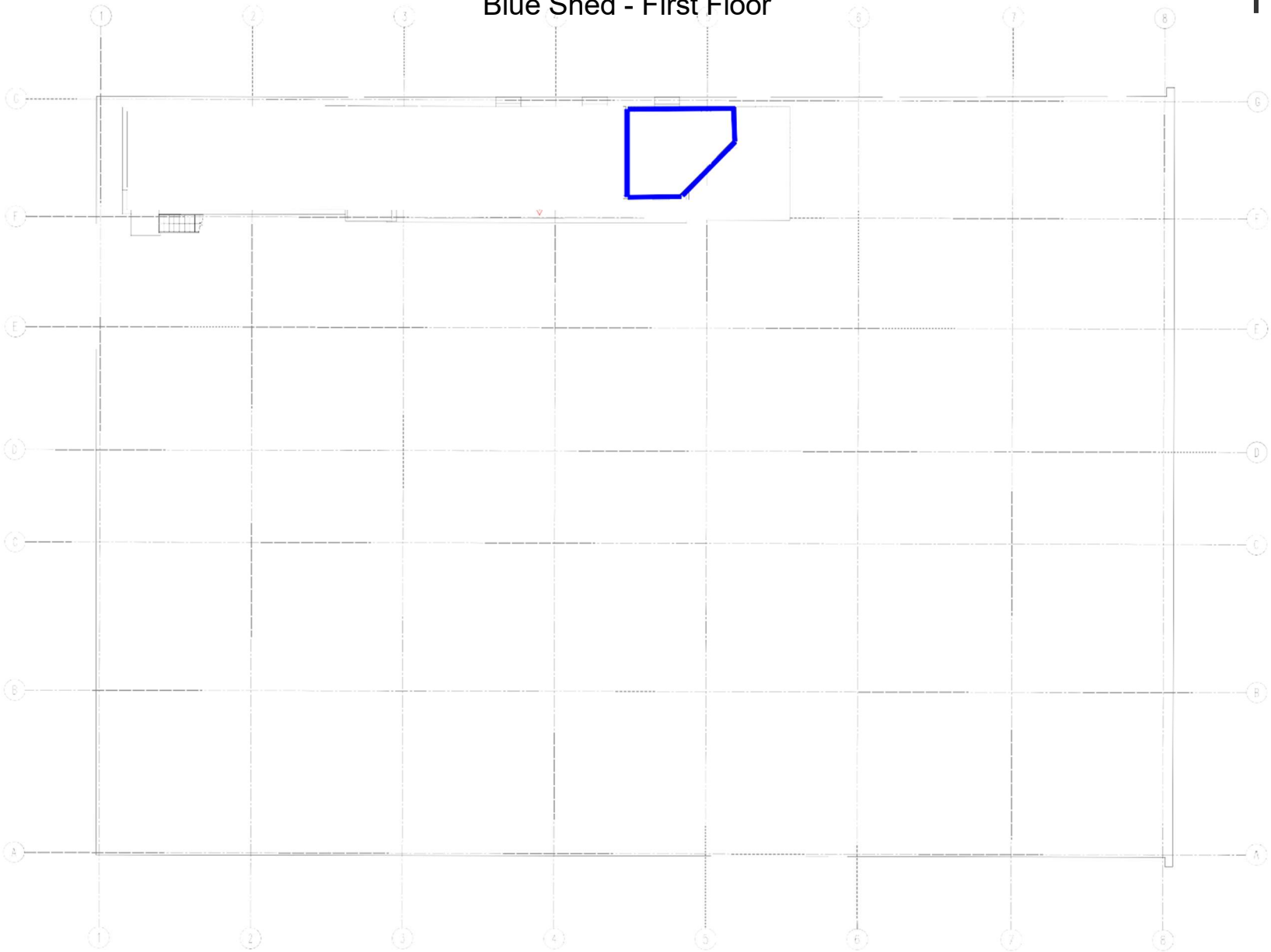
Ground Floor
General Arrangement Plan

04/08/15 V/R

RMS/S/6/4001

Blue Shed - First Floor

Plan 6



DO NOT SCALE - IF IN DOUBT ASK
Associated Drawings

General Notes

LEGEND
XXXX FIRE DOOR
XXXX STANDARD DOOR

1ST FLR

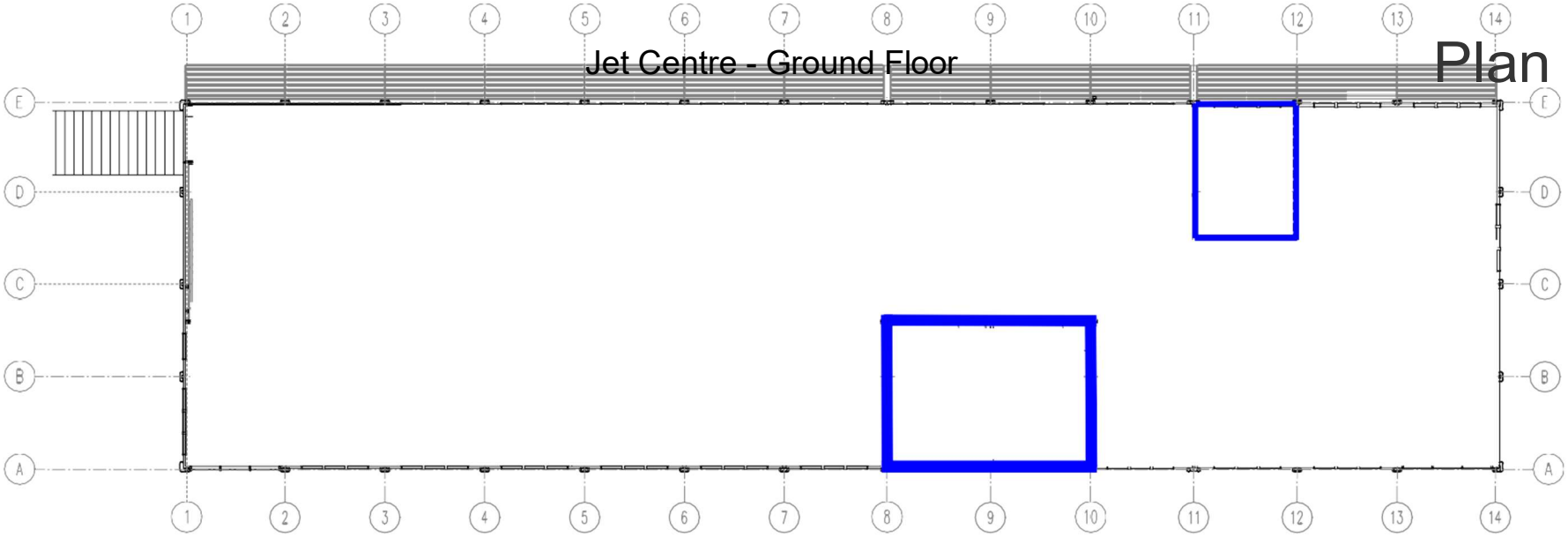
London City Airport
Get closer.

RECORD DRAWING

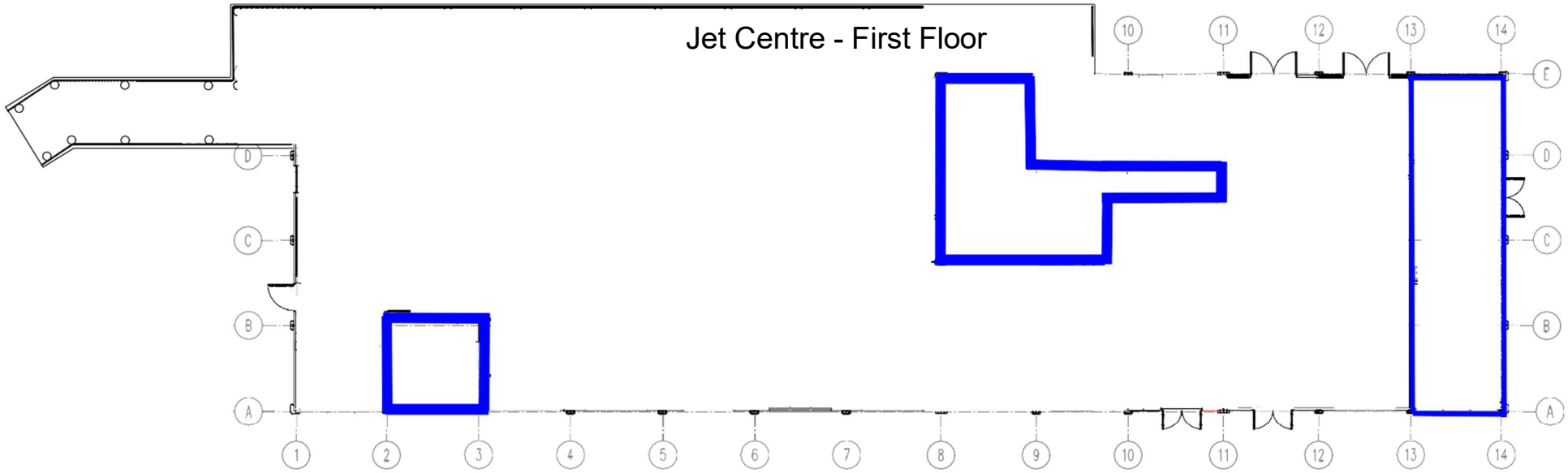
BLUE SHED

Jet Centre - Ground Floor

Plan 7



Jet Centre - First Floor



LEGEND

XXXX Fire Door

XXXX Standard Door

E	Room Numbers Added	16/08/18
D	Layout amended	18/04/18
C	04/04/18	04/02/18
B	Door Numbers Added	04/02/18
A	Modified as indicated	12/08/15

G-I FLRS

London City Airport
Get closer.

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

RECORD DRAWING

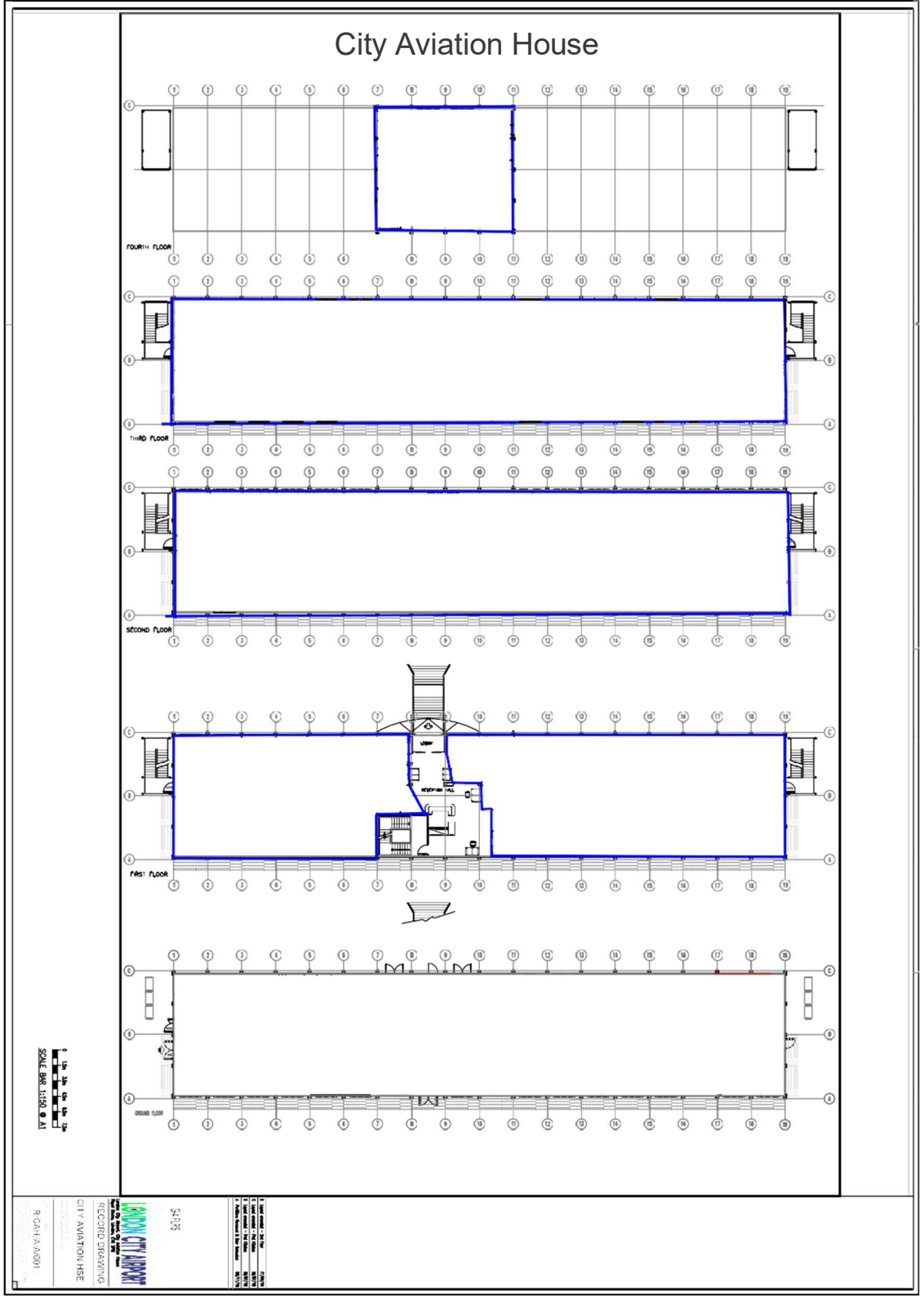
JET CENTRE

Ground to First Floor
General Arrangement Plan

R/JC/A/A/001

SCALE BAR 1:75 @ A1

Plan 8


City Aviation House
FOURTH FLOOR
THIRD FLOOR
SECOND FLOOR
FIRST FLOOR
GROUND FLOOR
SCALE BAR 1:150 @ A1
CITY AVIATION HSE
RECORD DRAWING
R:\CAH\A\A001

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

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

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 (KB-2024-1765)

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD
Claimants (KB-2024-2132)

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED
Claimants (KB-2024-2317)

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED
Claimants (KB-2024-2473)

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS
Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)

AJW16

This is the exhibit marked "AJW16" in the witness statement of Alexander James Wright.

HIGH COURT CLAIM NO: KB-2024-001765

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 20 June 2024

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

FROM: (1) London City Airport Ltd and (2) Docklands Aviation Group Ltd

This notice relates to the land known as London City Airport, Royal Docks, London E16 2PB which is shown for illustration purposes edged red on the adjacent Plan but excluding: (a) the buildings coloured blue; (b) certain parts of the buildings coloured green; (c) the sections of the Docklands Light Railway coloured purple; and (d) the subsoil structures coloured pink (the "**Land**")

It is ordered that, until 20 June 2029 or further order in the meantime, the Defendants must not without the consent of the Claimants, enter, occupy or remain upon the Land.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 June 2024 may be viewed at: www.londoncityairport.co.uk/corporate/corporate-info/reports-and-publications/injunction.

Hard copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

Draft Order

This exhibit appears at pages 2026 to 2028.

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Amended pursuant to the order of HHJ Coe KC dated 5 July 2024

Claim Form

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 – –

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.

For court use only	
Claim no.	
Issue date	

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

(1) **Manchester Airport PLC**
of Level 5 Town Hall Extension, Albert Square, Manchester M60 2LA
(2) **Airport City (Manchester) Limited**
of 6th Olympic House, Manchester Airport, Manchester M90 1QX
(3) **Manchester Airport Car Park (1) Limited**
of 6th Olympic House, Manchester Airport, Manchester M90 1QX
(4) **Stansted Airport Limited**
of Enterprise House, Bassingbourn Road, Stansted Airport, Essex CM24 1QW
(5) **East Midlands International Airport Limited**
of Pathfinder House, Castle Donington, Derby DE74 2SA

SEAL
HIGH COURT OF JUSTICE
19 Jul 2024
QUEEN'S BENCH DIVISION

KB-2024-002132
DATE OF ISSUE
03/07/2024

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

Please refer to Schedule 1 attached to the Claim Form

Brief details of claim

The Claimants seek an injunction to restrain the Defendants from acts of trespass and/or private and/or public nuisance on the land edged red on Plans 1 - 3.

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.

© Crown Copyright 2022

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

- [x] 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
03	0 7	2 0 2 4

Full name

Stuart 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.

Allybom/077654.000167

Email

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

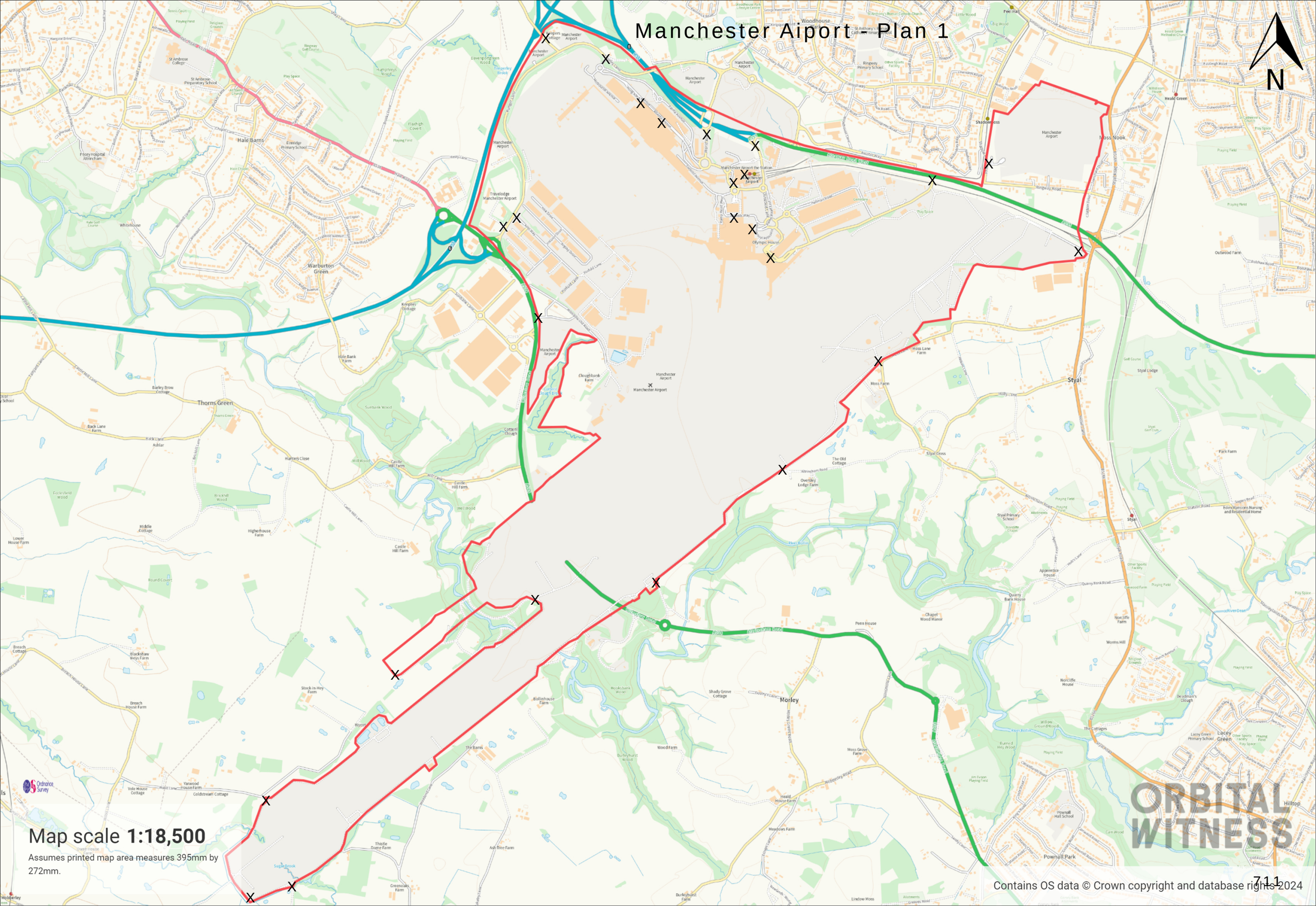
SCHEDULE 1 TO THE CLAIM FORM

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

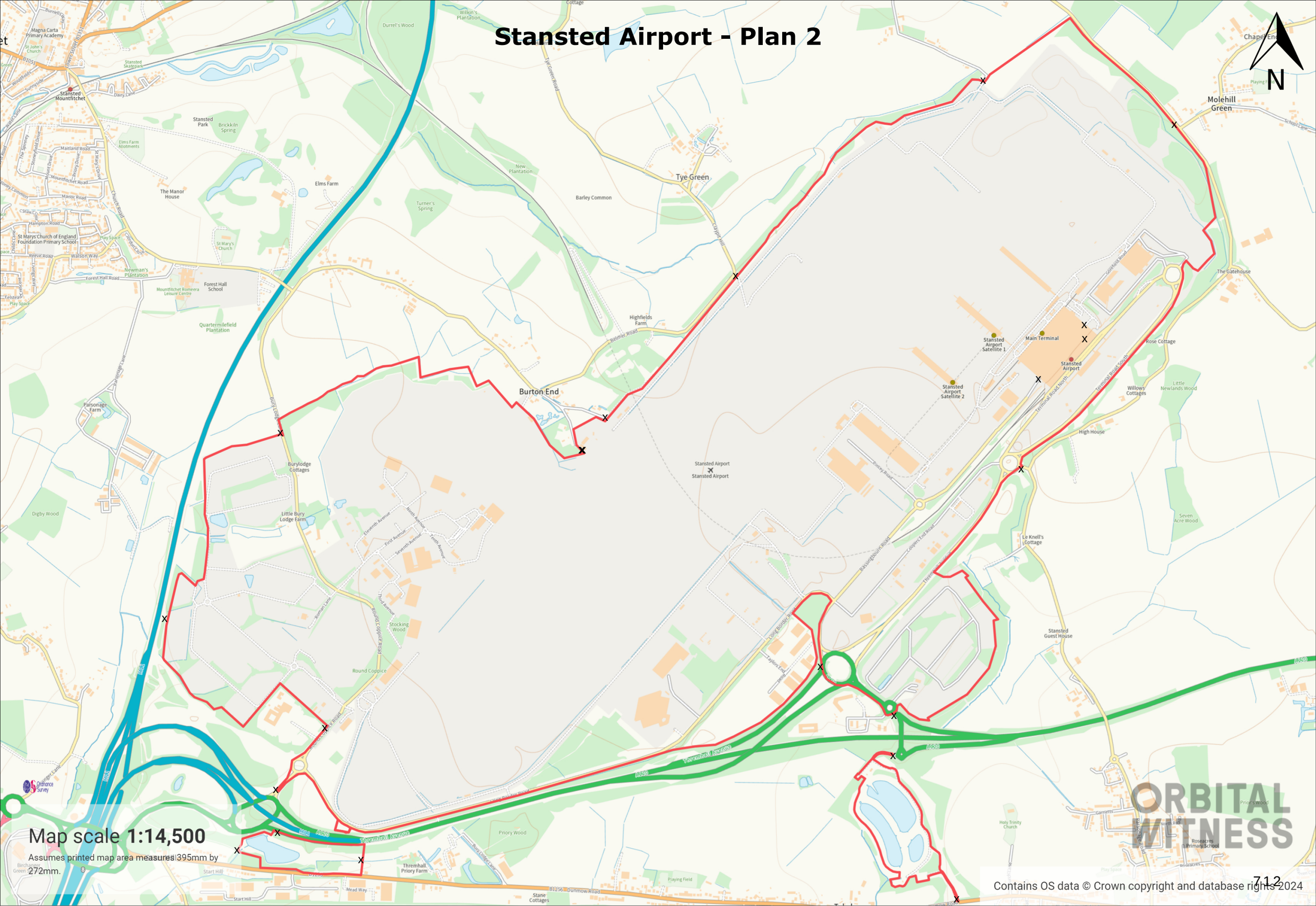
(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Manchester Aiport - Plan 1



Stansted Airport - Plan 2



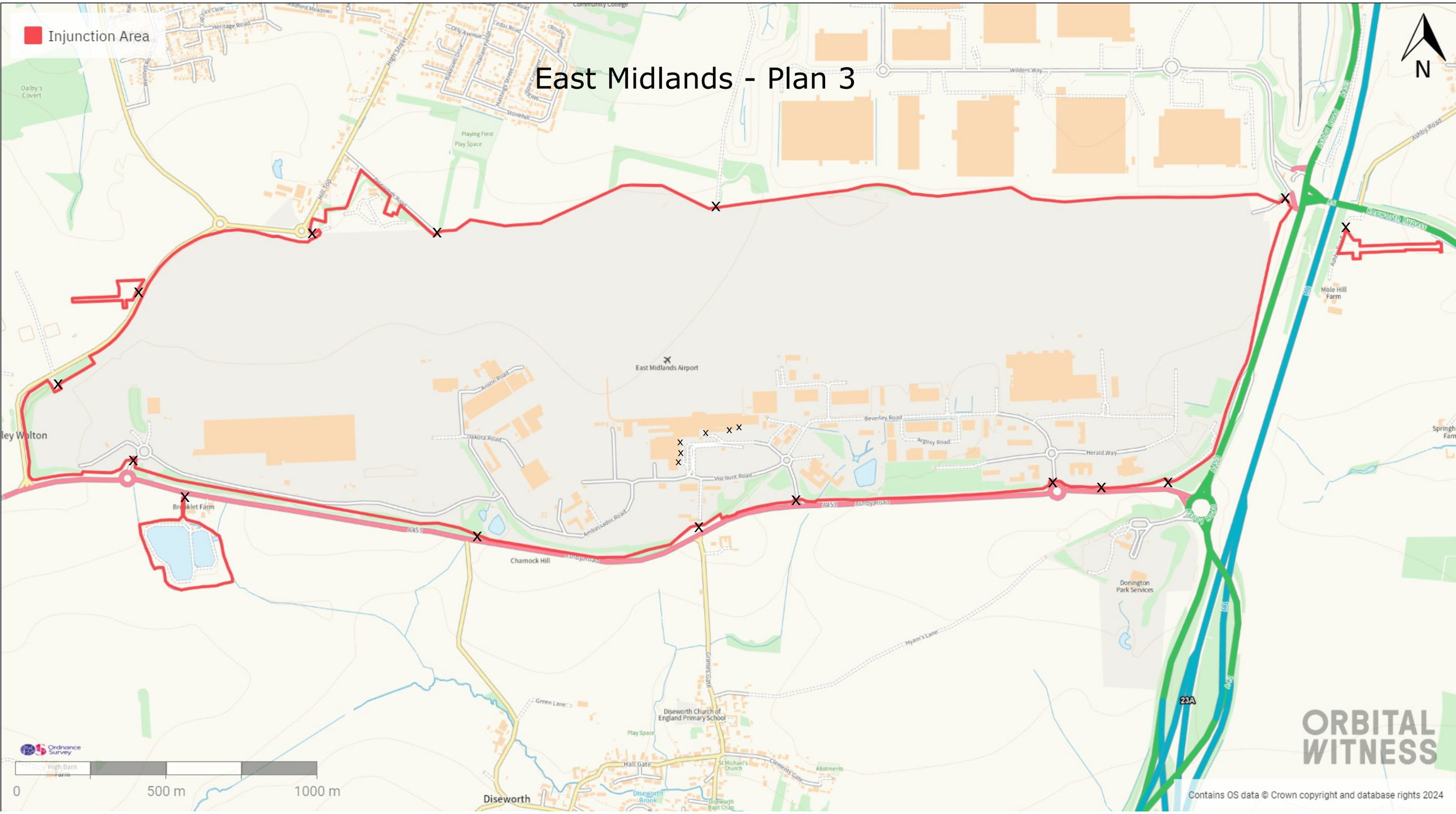
Map scale **1:14,500**

Assumes printed map area measures 395mm by 272mm.

ORBITAL WITNESS

Contains OS data © Crown copyright and database rights 2024

East Midlands - Plan 3



Amended pursuant to the order of HHJ Coe K.C. dated 5 July 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2024-002132

BETWEEN:-

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Defendants

PARTICULARS OF CLAIM

Manchester Airport

1. The First Claimant is the operator of Manchester Airport, located in Manchester M90 1QX, shown outlined in red on Plan 1 ("**Manchester Airport**"). Manchester Airport serves around 25 million travelling passengers each year with an annual revenue of approximately £425 million.

2. The First, Second and Third Claimants are the registered proprietors of the land on which Manchester Airport is situated as shown in red on Plan 1, through a mixture of freehold and leasehold interests as shown in the Title Schedule hereto — but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas and subject also to certain highways.

3. Subject to those interests, the First, Second and Third Claimants are entitled to an immediate right of possession occupation and control of Manchester Airport, by virtue of their respective titles as shown in the Title Schedule.

4. Plan 1A depicts the areas within Manchester Airport which are the subject of third party interests, shown thereon shaded in blue, green and brown ("**the Manchester Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First, Second and Third Claimants are displaced as the persons with an immediate right of occupation or possession. The brown land is a railway/ railway station. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes certain the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

5. Nevertheless, access to or from the Manchester Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Manchester Aiport which remain unencumbered by any such arrangement and in relation to which, accordingly, the First to Third Claimants remain entitled to possession occupation and control by virtue of their interests shown in the Title Schedule.

6. Also shown on Plan 1A are the highways shown shaded in pink on Plan 1A, which run beneath the taxiway within the Airport and/or provide access to Manchester Airport to the First to Third Claimants and their licensees (including members of the public).

7. By virtue of s63 of the Airports Act 1996, the First Claimant has power to make byelaws with respect to Manchester Airport. Pursuant to the Manchester Airport Byelaws 2024, byelaw 3.36, 3.10 and 3.34, no person has a right to use any part of Manchester Airport as defined therein for protest. The plan which defines Manchester Airport for the purposes of the Byelaws is not in all respects identical to Plan 1. However, the area covered by the Byelaws includes (a) the Manchester Third Party Areas and (b) the highways therein.

Stansted Airport

8. The Fourth Claimant is the operator of Stansted Airport, located in Stansted CM24 1QW, shown outlined in red on Plan 2 ("**Stansted Airport**"). Stansted Airport serves around 25 million travelling passengers each year with an annual revenue of approximately £373 million.

9. The Fourth Claimant is the proprietor of the land on which Stansted Airport is situated as shown in red on Plan 2, through the interests shown in the Title Schedule hereto—— but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

10. Subject to those interests of third parties, the Fourth Claimant is entitled to an immediate right of possession occupation and control of Stansted Airport, by virtue of its titles as shown in the Title Schedule.

11. Plan 2A depicts the areas within Stansted Airport which are the subject of third party interests, shown thereon shaded in blue, green, purple and pink ("**the Stansted Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fourth Claimant is displaced as the person with an immediate right of occupation or possession. The purple land is a railway station. The pink land is a railway tunnel. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes certain the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

12. Nevertheless, access to or from the Stansted Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Stansted Aiport which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fourth Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

13. By virtue of s63 of the Airports Act 1996, the Fourth Claimant has power to make byelaws with respect to Stansted Airport. Pursuant to the Stansted Airport Byelaws 1996, byelaws 3.17 and 3.19, no person has a right to use any part of Stansted Airport for protest.

East Midlands Airport

14. The Fifth Claimant is the operator of East Midlands International Airport, located in Castle Donnington, Derby DE74 2SA, shown outlined in red on Plan 3 ("**EMA**"). EMA served around 3.3 million travelling passengers each year with an annual revenue of approximately £81 million.

15. The Fifth Claimant is the proprietor of the land on which EMA is situated as shown in red on Plan 3, through the interests shown in the Title Schedule hereto—but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

16. Subject to those interests of third parties, the Fifth Claimant is entitled to an immediate right of possession occupation and control of EMA, by virtue of its titles as shown in the Title Schedule.

17. Plan 3A depicts the areas within EMA which are the subject of third party interests, shown thereon shaded in blue and green ("**the EMA Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fifth Claimant is displaced as the person with an immediate right of occupation or possession. The blue land consists of (and the green land includes) areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes certain the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

18. One of those areas, namely, the East Midlands Aeropark, takes direct access from the public highway. Subject to that exception: access to or from the EMA Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of the EMA which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fifth Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

19. By virtue of s63 of the Airports Act 1996, the Fifth Claimant has power to make byelaws with respect to EMA. Pursuant to the East Midlands Airport Byelaws 2001, byelaw 3.5, no person has a right to use any part of Stansted Airport for protest.

The Claimants' claims

20. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management/ airline facilities, and a railway station.

21. In relation to each airport:

    a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).

    b. No wider consent subsists; and (subject to the highways at Manchester Airport described above) no public right of access, or way, subsists over the airports.

    c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.

    d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

22. In relation to the Third Party Areas at each airport:

    a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the

Court to make an order which does not distinguish between the airports generally (as shown outlined in red on the various plans) and the Third Party Areas within them;

b. Further or alternatively, protest which occurs on the Third Party Areas threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.

23. Further, in respect of the highways at Manchester Airport described above: protest which occurs on these highways threatens:

a. Unreasonably and substantially to interfere with the First,Second and Third Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;

b. Unreasonably and substantially to obstruct or hinder the free passage along the highway, occasioning particular damage to the First, Second and Third Claimants; and

c. In respect of the tunnelled highway in pink on Plan 1A, unreasonably and substantially to interfere with the First, Second and Third Claimants' ordinary use and enjoyment of the airport, insofar as a need might arise to close off the runaway for safety reasons; and

d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the Manchester Airport Byelaws 2024.

The threats

24. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:

25. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations…"

26. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").

27. 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.

28. Since that 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?"*

29. 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?"*

30. 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**.*
>
> *…"*

31. 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/tZIoducgpqTMtE9dgMMhlaymvEZgO45jgJ19A)*
>
> *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,*
>
> *Just Stop Oil"*

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

[1] As of 27 June 2024, £24,099 had been raised on this website.

33. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at Stansted Airport, in one of the Third Party Areas (an area which is subject to an occupational arrangement with a third party), as part of a series of protests on climate change. This included:

    a. an individual using an angle grinder to cut a hole in the perimeter fence of the airport;

    b. two individuals trespassing the perimeter fence; and

    c. spray painting two aircrafts orange using a fire extinguisher.

34. As a result of this direct action:

    a. Notwithstanding that the protest took place on a Third Party Area, it was necessary to suspend operations on the runway on the Fourth Claimant's retained land in Stansted Airport for approximately 50 minutes: three aircraft departures were affected.

    b. the two individuals (known as Jenifer Kowalski and Cole Macdonald) were arrested and charged with causing criminal damage, aggravated trespass and interference with the use or operation of national infrastructure.

35. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for Manchester Airport, Stansted Airport and/or East Midlands Airport:

    a. trespass on the Airport and/or

    b. by protest conducted on or from the Third Party Areas, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or

    c. by protest conducted on or from the highways on Plan 1A, obstruct those occasioning particular damage to the First, Second and Third Claimants and/or interfere with the First, Second and Third Claimants' right of access to Manchester Airport via those highways, so as to cause a nuisance actionable by the First, Second and Third Claimants.

36. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.

37. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:

    a. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.

    b. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive — by which point harm may already have occurred.

    c. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.

    d. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many tens or hundreds of millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.

e. The airports in the present case are all the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the Claimants are fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the Byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at Stansted Airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.

f. Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.

g. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND THE FIRST, SECOND AND THIRD CLAIMANTS CLAIM AGAINST THE FIRST DEFENDANT:

(1) Subject to periodic review by the Court on application by the Claimants at intervals not exceeding 24 months or such other period as the Court may determine, an order that the First Defendants must not, without the consent of the First, Second and Third Claimants (or either of them), enter, occupy or remain upon the land outlined in red on Plan 1.

AND THE FOURTH CLAIMANT CLAIMS AS AGAINST THE SECOND DEFENDANT:

(2) Subject to periodic review by the Court on application by the Claimants at intervals not exceeding 24 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent of the Claimants, enter, occupy or remain upon the land outlined in red on Plan 2.

AND THE FIFTH CLAIMANT CLAIMS AGAINST THE THIRD DEFENDANT:

(3) Subject to periodic review by the Court on application by the Claimants at intervals not exceeding 24 months or such other period as the Court may determine, an order that the Third Defendants must not, without the consent of the Claimants, enter, occupy or remain upon the land outlined in red on Plan 3.

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

Title Schedule to the Particulars of Claim

1. The First Claimant is the registered proprietor of the following titles:-

Registered Title	**Freehold / Leasehold**
GM408669	Leasehold
GM724915	Leasehold
GM839013	Leasehold
MAN315638	Leasehold
CH373359	Leasehold
CH408609	Leasehold
CH408610	Leasehold
CH414019	Leasehold
CH469834	Leasehold
CH469835	Leasehold
CH593537	Leasehold
GM827720	Leasehold
GM869598	Leasehold
GM874357	Leasehold
GM874715	Leasehold
GM923439	Leasehold
MAN157825	Leasehold
MAN404429	Leasehold
MAN8976	Leasehold
MAN348640	Leasehold
MAN359310	Leasehold

2. The Second Claimant is the registered proprietor of the following titles:-

Registered Title	**Freehold / Leasehold**
GM513511	Freehold
MAN371404	Leasehold
MAN269014	Leasehold
MAN270740	Leasehold

3. The Third Claimant is the registered proprietor of the following title:-

Registered Title	**Freehold / Leasehold**
MAN371404	Leasehold

4. The Fourth Claimant is the registered proprietor of the following titles:

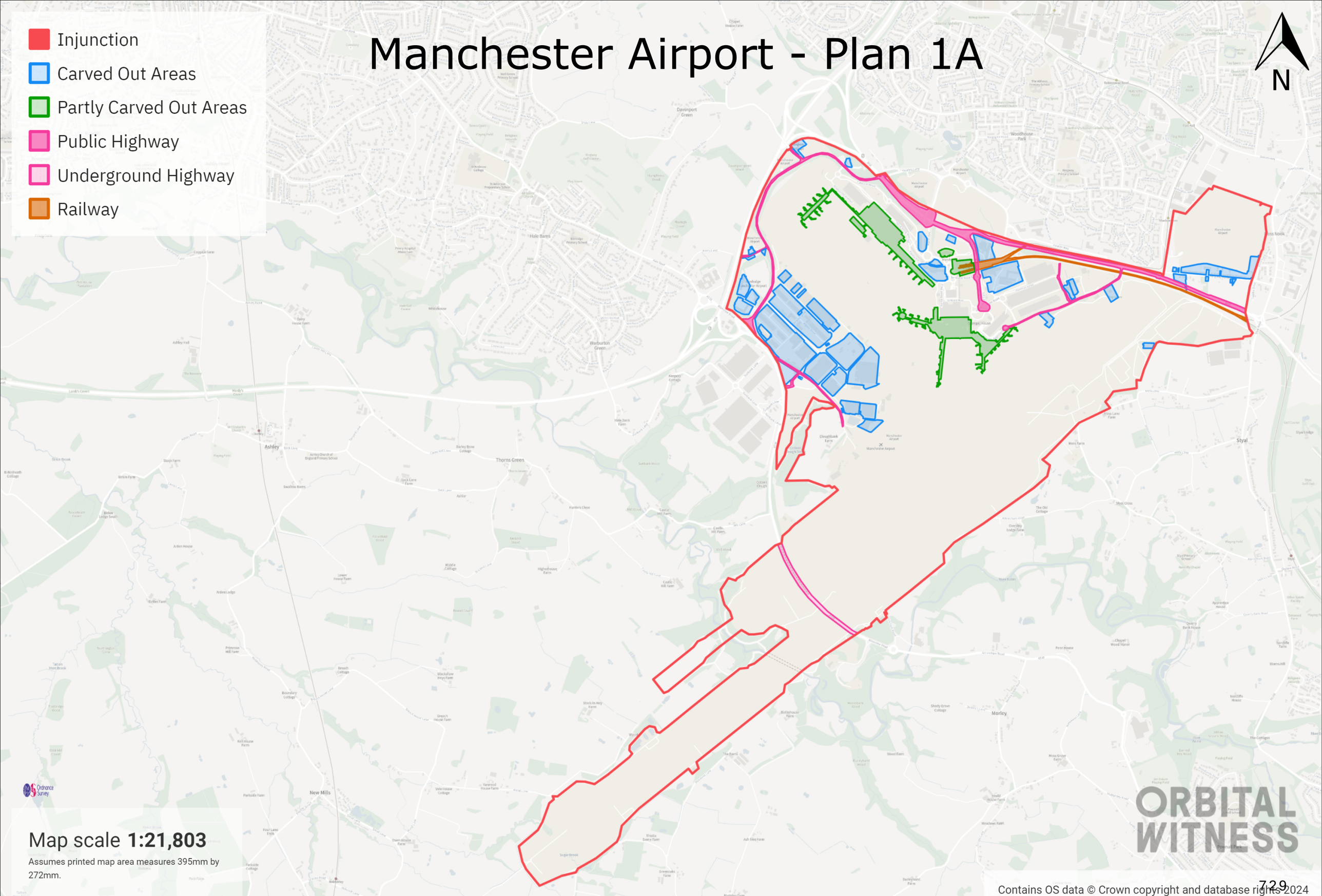
Registered Title	**Freehold / Leasehold**
EX438482	Freehold
EX574488	Freehold
EX574502	Freehold
EX574498	Freehold
EX574495	Freehold
EX574482	Freehold
EX574485	Freehold
EX574491	Freehold
EX574504	Freehold
EX574508	Freehold
EX574523	Freehold
EX948708	Freehold
EX574513	Freehold
EX640482	Freehold
EX574507	Freehold
EX574477	Freehold
EX574473	Freehold
EX438486	Freehold
AA7858	Leasehold
EX900137	Leasehold
EX976114	Leasehold

5. The Fourth Claimant also has a lease of the buildings known as 6002 and 6003 at Stansted Airport granted on 20 September 2022 and made between Airport Industrial GP Limited and Airport Industrial Nominees Limited which is unregistered and is shown coloured brown on Plan 2.

6. The Fifth Claimant is the registered owner of the following titles:-

Registered Title	**Freehold / Leasehold**
LT113826	Freehold
LT300968	Freehold
LT305941	Freehold
LT325861	Freehold
LT289774	Freehold

Manchester Airport - Plan 1A



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Stansted Airport - Plan 2A

- Injunction
- Carved Out Areas
- Partly Carved Out Areas
- Railway Station
- Railway Tunnel

N

Map scale **1:14,500**

Assumes printed map area measures 395mm by 272mm.

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East Midlands Airport - Plan 3A



CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants



- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it 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 the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON HEARING Leading and Junior Counsel for the Claimants

AND UPON each of the First, Second and Third Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

IT IS ORDERED THAT:

DEFINITIONS

1. "**Manchester Airport**" means the land shown outlined in red on Plan 1 to the Claim Form (including the highways therein), appended to this Order in Schedule 1 ("**Plan 1**").

2. "**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (https://www.manchesterairport.co.uk/injunction/) at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the First Defendants and each of them are forbidden from doing the following:

    a. Entering, occupying or remaining on any part of Manchester Airport without the consent of the First, Second and Third Claimants (or any of them);

    b. Affixing themselves to any other person or object on Manchester Airport;

    c. Impeding access to or enjoyment of Manchester Airport by the First, Second and Third Claimants (or any of them) and those authorised by the First, Second and Third Claimants (or any of them), whether by blocking any entrance or otherwise;

    d. Blocking or obstructing the free and safe passage of traffic onto or along or across the highways within Manchester Airport;

    e. Refusing to leave the aforesaid parts of the highways when asked to do so by a police constable, when contravening any of paragraphs 3(b) and/or (d);

    f. Continuing to do any act prohibited by paragraphs 3(a) to (e) above.

4. This Order is subject to periodic review by the Court on application by the First, Second and Third Claimants at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First, Second and Third Claimants shall take the following steps by way of service of copies of the amended

Claim Form, amended Particulars of Claim, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") upon the First Defendants:

a. Uploading a copy onto the following website: https://www.manchesterairport.co.uk/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. 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.

6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the First Defendants by the First, Second and Third Claimants carrying out each of the following steps:

a. Uploading a copy of the Order onto the following website: https://www.manchesterairport.co.uk/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.

7. The taking of such steps set out at paragraph 5 and 6 shall been good and sufficient service of this Order and of the Claim Documents upon the First Defendants and each of them.

8. The Court will provide sealed copies of this Order to the First, Second and Third Claimants' solicitors for service (whose details are set out below).

9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

10. Service on the First Defendants of any further applications or documents in the proceedings by the First, Second and Third Claimants (or any of them) shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).

11. Anyone 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 First, Second and Third Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com . If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the First, Second and Third Claimants' solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

13. The First, Second and Third Claimants (or any of them) have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FIRST, SECOND AND THIRD CLAIMANTS

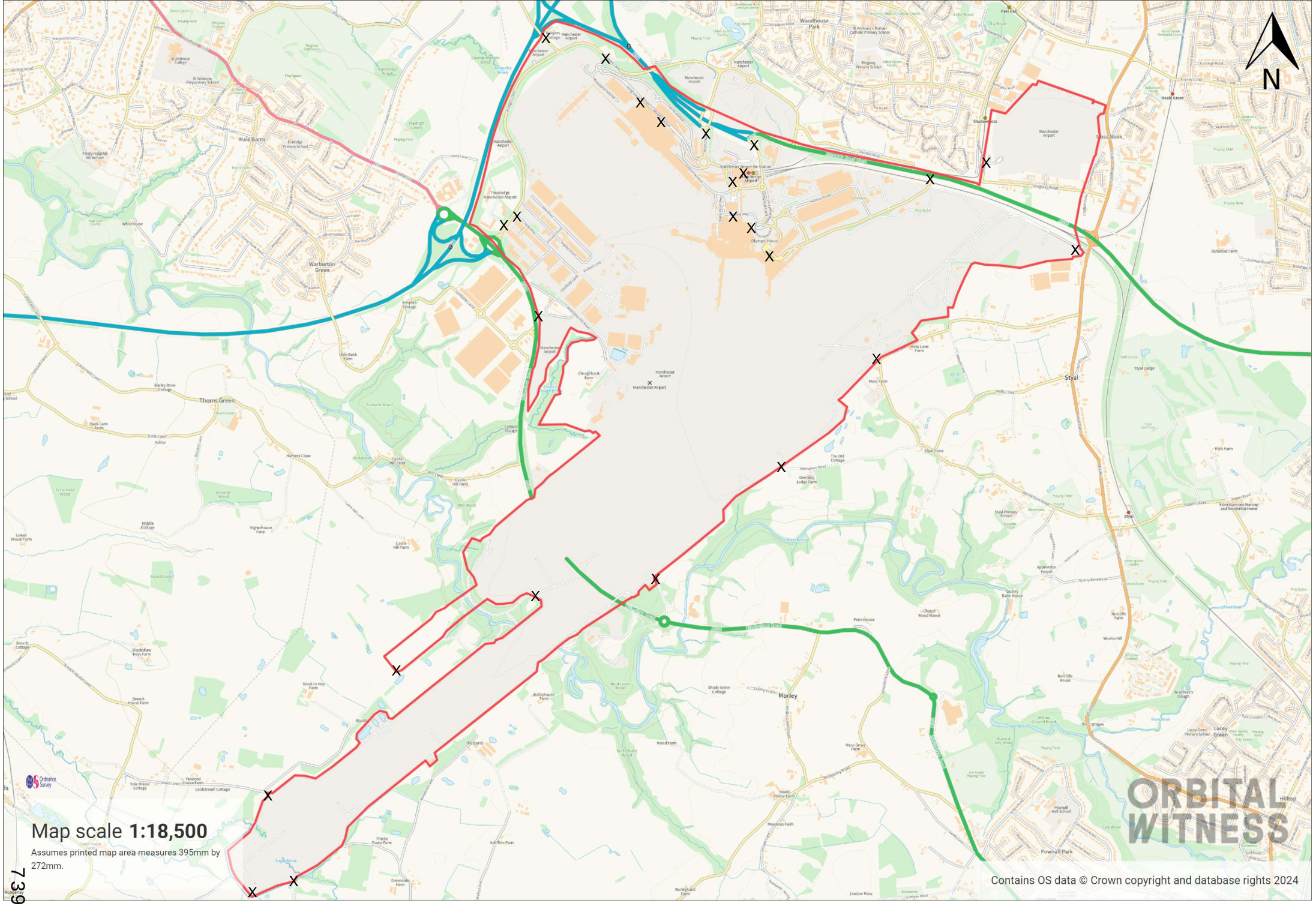
16. The First, Second and Third Claimants' solicitors and their contact details are:

(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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1


N
Map scale 1:18,500
Assumes printed map area measures 395mm by 272mm.
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ORBITAL WITNESS

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST, SECOND AND THIRD

(1) The First, Second and Third Claimants will take steps to serve the First Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.

(2) The First, Second and Third 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 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

TO: Persons Unknown whose purpose is or includes protest on the premises at Manchester Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

FROM: Manchester Airport Plc, Airport City (Manchester) Ltd, and Manchester Airport Car Park (1) Limited ("the **First, Second and Third Claimants**")

This notice relates to the land known as Manchester Airport, Manchester, M90 1QX which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the First, Second, and Third Claimants

2. Affixing themselves to any other person or object on the Airport.

3. Impeding access to or enjoyment of the Airport by the First, Second and Third Claimants or those authorised by the First, Second, and Third Claimants, whether by blocking access to any entrance or otherwise.

4. Blocking or obstructing the free and safe passage of traffic onto or along or across those parts of the highway show the red line outlined on the Plan;

5. Refusing to leave the parts of the highways on the Plan when asked to do so by a police constable, when contravening any paragraph 1 and/or 4.

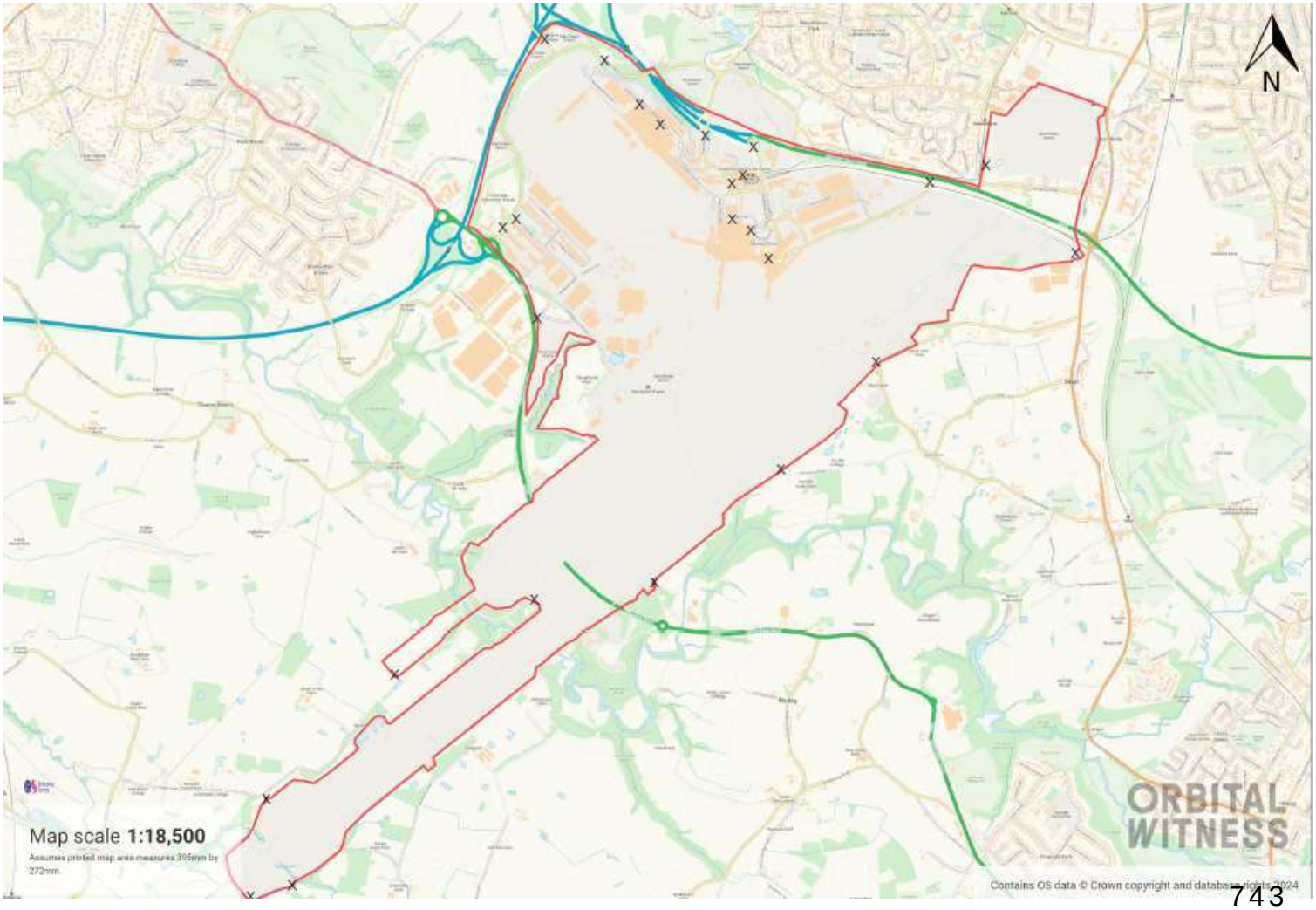
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First, Second and Third Claimants solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: https://www.manchesterairport.co.uk/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email: StuartWortley@eversheds-sutherland.com



CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants



- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it 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 the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

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

IT IS ORDERED THAT:

DEFINITIONS

1. "**Stansted Airport**" means the land shown in red outlined in red on Plan 2 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

2. "**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (https://www.stanstedairport.com/injunction/) at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the Second Defendants and each of them are forbidden from doing the following:

    a. Entering, occupying or remaining on any part of Stansted Airport without the consent of the Fourth Claimant;

    b. Affixing themselves to any other person or object on Stansted Airport;

    c. Impeding access to or enjoyment of Stansted Airport by the Fourth Claimant and those authorised by the Fourth Claimant, whether by blocking any entrance or otherwise;

    d. Continuing to do any act prohibited by paragraphs 3(a) to (c) above.

4. This Order is subject to periodic review by the Court on application by the Fourth Claimant at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Fourth Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") upon the Second Defendants:

    a. Uploading a copy onto the following website: https://www.stanstedairport.com/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. Affixing a notice at those locations marked with an "X" on Plan 2 setting out where these documents can be found and obtained in hard copy.

6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the Defendants by the Claimant carrying out each of the following steps:

a. Uploading a copy of the Order onto the following website: https://www.stanstedairport.com/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 2.

d. Affixing Warning Notices of A2 size at those locations marked with an "X" on Plan 2.

7. The taking of such steps set out at paragraph 5 and 6 shall been good and sufficient service of this Order and of the Claim Documents upon the Second Defendants and each of them.

8. The Court will provide sealed copies of this Order to the Fourth Claimant's solicitors for service (whose details are set out below).

9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

10. Service on the Second Defendants of any further applications or documents in the proceedings by the Fourth Claimant shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).

11. Anyone 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 Fourth Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Fourth Claimant's solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

13. The Fourth Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FOURTH CLAIMANT

16. The Fourth Claimant's solicitors and their contact details are:

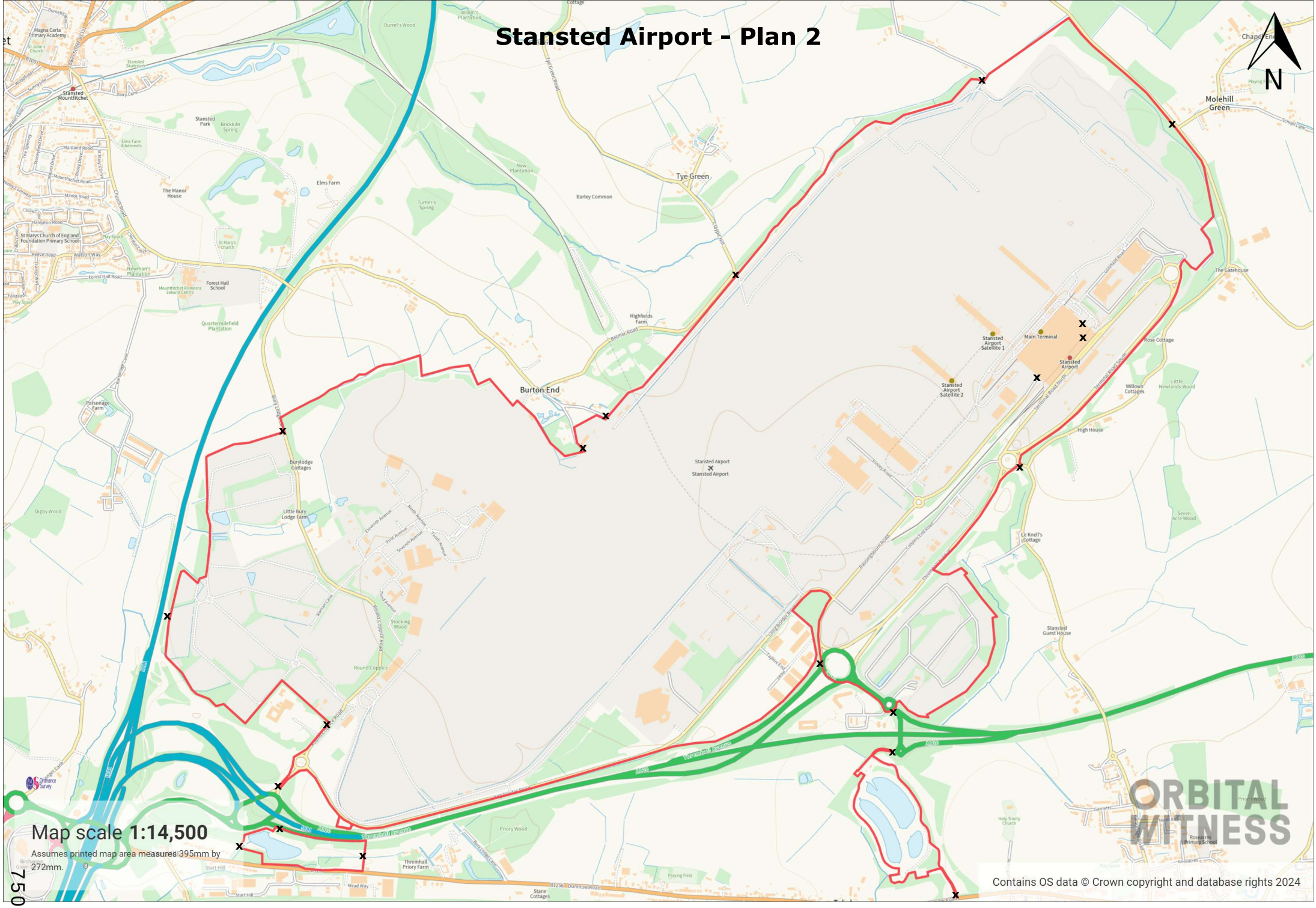
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Stansted Airport - Plan 2



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FOURTH CLAIMANT

(1) The Fourth Claimant will take steps to serve the Second Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.

(2) The Fourth Claimant 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 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

TO: Persons Unknown whose purpose is or includes protest on the premises at Stansted Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

FROM: Stansted Airport Ltd ("the **Fourth Claimant**")

This notice relates to the land known as Stansted Airport, Stansted, CM24 1QW which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the Fourth Claimant

2. Affixing themselves to any other person or object on the Airport.

3. Impeding access to or enjoyment of the Airport by the Fourth Claimant or those authorised by the Fourth Claimant, whether by blocking access to any entrance or otherwise.

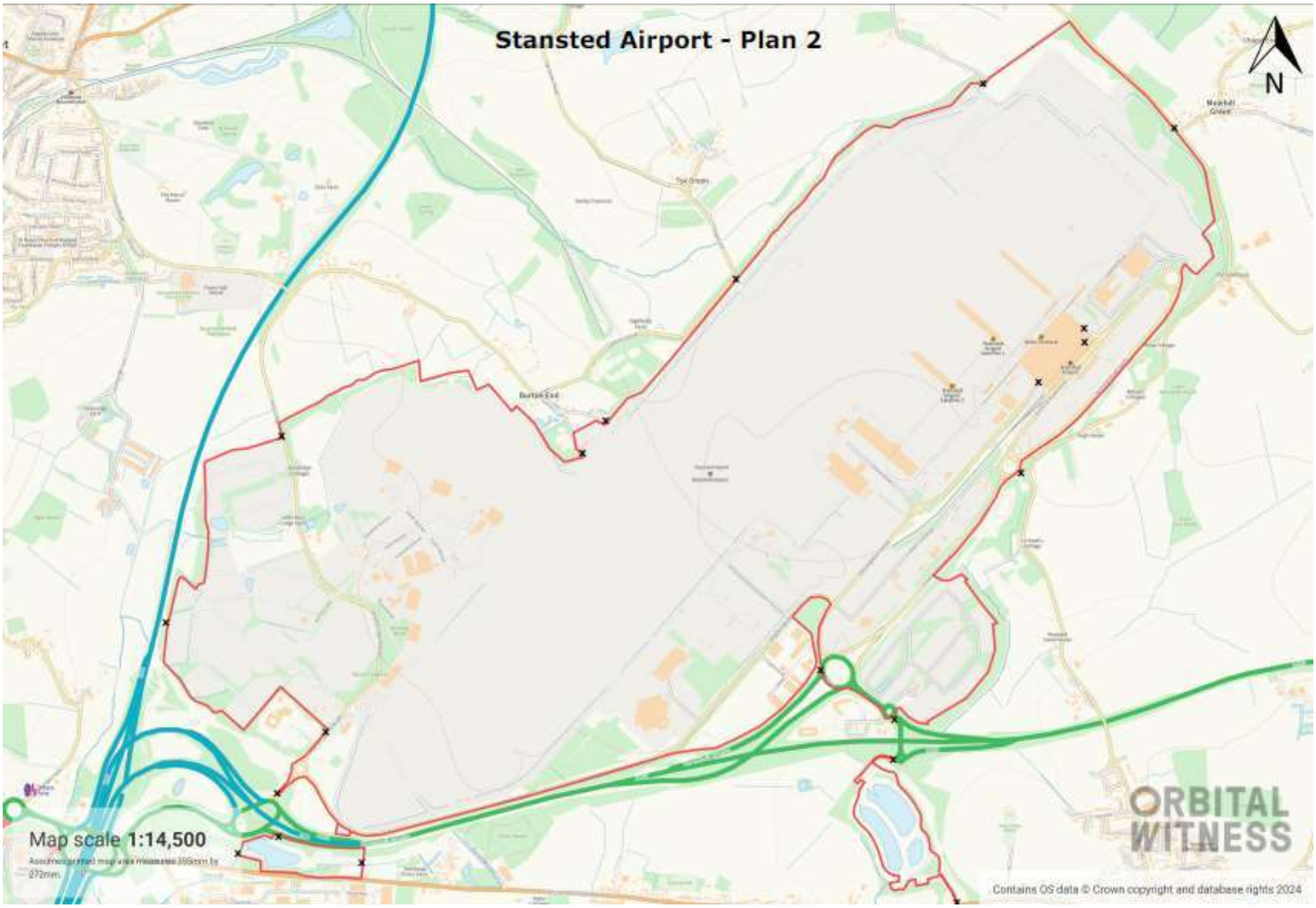
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fourth Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: https://www.stanstedairport.com/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants



- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) **PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it 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 the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

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

IT IS ORDERED THAT:

DEFINITIONS

1. "**East Midlands Airport**" means the land shown in red outlined in red on Plan 3 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

2. "**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (https://www.eastmidlandsairport.com/injunction/) at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the Third Defendants and each of them are forbidden from doing the following:

    a. Entering, occupying or remaining on any part of East Midlands Airport without the consent of the Fifth Claimant;

    b. Affixing themselves to any other person or object on East Midlands Airport;

    c. Impeding access to or enjoyment of East Midlands Airport by the Fifth Claimant and those authorised by the Fifth Claimant, whether by blocking any entrance or otherwise;

    d. Continuing to do any act prohibited by paragraphs 3(a) to (c) above.

4. This Order is subject to periodic review by the Court on application by the Fifth Claimant at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Fifth Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") upon the Third Defendants:

    a. Uploading a copy onto the following website: https://www.eastmidlandsairport.com/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. Affixing a notice at those locations marked with an "X" on Plan 3 setting out where these documents can be found and obtained in hard copy.

6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the Third Defendants by the Fifth Claimant carrying out each of the following steps:

a. Uploading a copy of the Order onto the following website: https://www.eastmidlandsairport.com/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 3.

d. Affixing Warning Notices of A2 size at those locations marked with an "X" on Plan 3.

7. The taking of such steps set out at paragraph 5 and 6 shall been good and sufficient service of this Order and of the Claim Documents upon the Third Defendants and each of them.

8. The Court will provide sealed copies of this Order to the Fifth Claimant's solicitors for service (whose details are set out below).

9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

10. Service on the Third Defendants of any further applications or documents in the proceedings by the Fifth Claimant shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).

11. Anyone 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 Fifth Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Fifth Claimant's solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

13. The Fifth Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FIFTH CLAIMANT

16. The Fifth Claimant's solicitors and their contact details are:

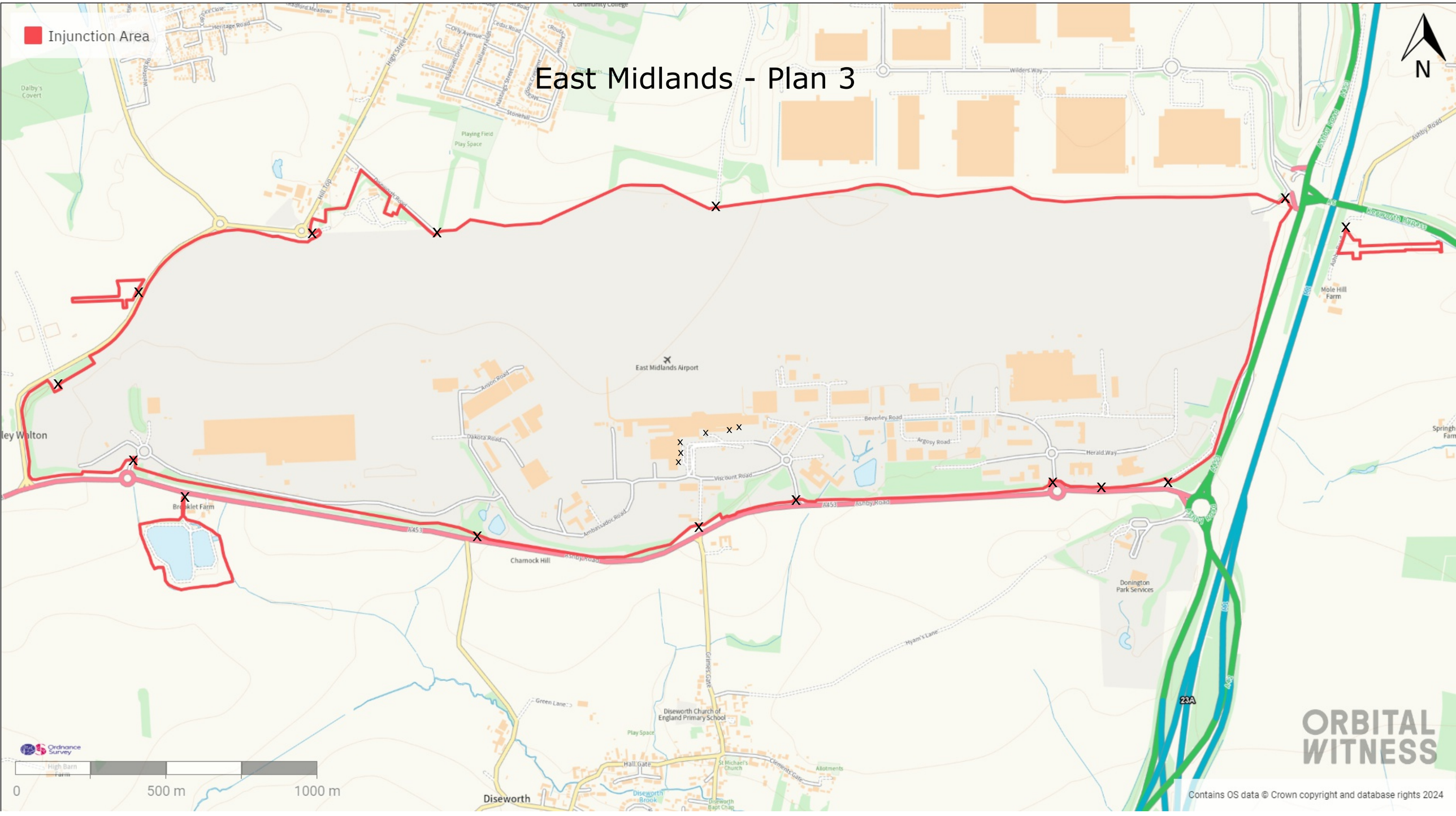
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

East Midlands - Plan 3



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIFTH CLAIMANT

(1) The Fifth Claimant will take steps to serve the Third Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.

(2) The Fifth Claimant 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 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

HIGH COURT CLAIM NO: KB-2024-002132

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

TO: Persons Unknown whose purpose is or includes protest on the premises at East Midlands International Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

FROM: East Midlands International Airport Ltd ("the **Fifth Claimant**")

This notice relates to the land known as East Midlands International Airport, Castle Donnington, Derby, DE74 2SA which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the Fifth Claimant

2. Affixing themselves to any other person or object on the Airport.

3. Impeding access to or enjoyment of the Airport by the Fifth Claimant or those authorised by the Fifth Claimant, whether by. blocking access to any entrance or otherwise.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fifth Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: https://www.eastmidlandsairport.com/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-



(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) **PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**

Defendants

ORDER

UPON the Claimants' claim by the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

AND UPON the Court granting the First to Third Claimant an injunction on 5 July 2024 ("**the Manchester Order**") in respect of the land shown outlined in red on Plan 1 to the Claim Form ("**Manchester Airport**")

AND UPON the Court granting the Fourth Claimant an injunction on 5 July 2024 ("**the Stansted Order**") in respect of the land shown outlined in red on Plan 2 to the Claim Form ("**Stansted Airport**")

AND UPON the Court granting the Fifth Claimant an injunction on 5 July 2024 ("**the EMA Order**") in respect of the land shown outlined in red on Plan 3 to the Claim Form ("**East Midlands Airport**")

IT IS ORDERED THAT:

PERMISSION TO AMEND

1. The Claimants have permission to amend the claim form and particulars of claim so as to refer to "Extinction Rebellion" in the name of the Defendants and shall file an amended Claim Form and amended Particulars of Claim.

THIRD PARTIES

2. By 19 July 2024, the First, Second and Third Claimants shall notify any persons who have a right or interest in Manchester Airport of the Manchester Order and provide a copy of the same to them by carrying out the following steps:
    a. Uploading a copy of this Order onto the following website: https://www.manchesterairport.co.uk/injunction/

b. Affixing a copy of this Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 1.

3. By 19 July 2024, the Fourth Claimant shall notify any persons who have a right or interest in Stansted Airport of the Stansted Order and provide a copy of the same to them by carrying out the following steps:

a. Uploading a copy of this Order onto the following website: https://www.stanstedairport.com/injunction

b. Affixing a copy of this Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 2.

4. By 19 July 2024, the Fifth Claimant shall notify any persons who have a right or interest in East Midlands Airport of the EMA Order and provide a copy of the same to them by carrying out the following steps:

a. Uploading a copy of this Order onto the following website: https://www.eastmidlandsairport.com/injunction/

b. Affixing a copy of this Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 3.

COMMUNICATIONS WITH THE CLAIMANTS

5. The Claimant's 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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BETWEEN:-

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) **PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**

Defendants

NOTE OF "WITHOUT NOTICE" HEARING BEFORE
HER HONOUR JUDGE COE K.C.
5 JULY 2024

Hearing commenced at 14:00.

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

TMKC introduced the case as one under the newly described jurisdiction which has been in the Supreme Court in Wolverhampton – sui generis relief against Persons Unknown.

TMKC addressed a misstatement in the skeleton argument in which it says that the third parties were asked about whether they would like to take part as joint Claimants. In fact, they were not

asked due to time pressure but there were miscommunications between TMKC and those instructing him.

Judge explained that if an Order is made as requested, it will presumably need to include provisions for the third parties to be notified.

Manchester Airport

Manchester Airport is a difficult area, but the "X" marked locations are where it is proposed to put notices.

TMKC referred to the Byelaws plan and how it cannot be used for the Injunction as it was not accurately drawn, as a result, C has attempted to duplicate the Byelaw map as if it had been done properly in producing the plans for the injunction (refers to witness statement of Mr Wortley).

TMKC described the title ownership of C at Manchester Airport and how the red line on Plan 1 falls within the land on Plan A, either as freeholders or leaseholders.

The effect of that in point of law is C's right to maintain trespass subject to certain exceptions (to be addressed later); such that no one has a right to be on that land except by C's consent.

TMKC, referring to witness statement of Mr Wortley (para 17) explained the carved out areas shown coloured blue, green and pink on Plan A etc.

TMKC explained that the carved out plans can create confusion, but it shows that in some instances C cannot claim trespass.

In order to make our claim good in trespass. Jurisdiction to give us relief on that basis.

TMKC explained the use of nuisance / threatened nuisance arising from the carved out areas, and an unreasonable use of land and the need for those areas to make the injunction in respect of the remaining land effective. TMKC uses example of protest at Stansted over a carved out area, which resulted in the runway being shut as a result of the risk of over-spill.

There were no trespass in that instance but the relief afforded by the injunction is still required.

Stansted Airport

TMKC explained that Plan 2 would be attached to the Order.

TMKC described the title ownership of C at Stansted Airport, and how the red line on Plan 2 falls within the land on Plan A, as either freeholder or leaseholder; third party areas are depicted in plan 2A.

TMKC explains there is no complication due to highways but there remains some complexity because floor plans in pockets of third party interests in different buildings at Stansted. Further, it would be inappropriate and misleading to treat the blue areas differently to the generality.

East Midlands Airport

TMKC explained Plan C, Plan 3 and the carved out plans.

TMKC explains why it is appropriate and necessary for us to be in receipt of the injunction in relation to trespass regarding the generality effective.

TMKC explained the effectiveness of injunctions in relation to other organisations (e.g. National Highways) but that campaigners have shifted their focus to airports. That has been manifested by pronouncements made expressly which Mr Wortley's statement sets out and the recent protest at Stansted.

TMKC disclosed the byelaws, relief of aggravated trespass and interference with national infrastructure. Those are available to the Airport, but the witness statement of Mr Wortley (para

42) includes evidence from which can be inferred that the protestors are willing to task risk in front of jury / magistrates but not a High Court judge.

TMKC explained how ineffective byelaws are for the type of action intended for the injunction to prevent – including the threshold of the punishment.

Legal tests / full and frank disclosure

TMKC referred to the cause of action.

TMKC addressed the duty of full and frank disclosure, including sufficient evidence to prove the claim, no realistic defence, *DPP v Zeigler*, damages not being an adequate remedy, and that if the injunction prohibits any conduct that is lawful, then it must be in a way that is no more than is proportionate.

The balancing exercise for the Judge in deciding whether to grant the injunction only needed to be done in public land (i.e. where there were highways) and clearly favoured the grant of an injunction.

TMKC referred to Leggatt LJ in *Cuadrilla* (endorsed in Court of Appeal in *Canada Goose* and Supreme Court in *Wolverhampton)* in relation to the third party area, makes the point that although the court must be careful not to impose an injunction in wider terms than are necessary to do justice, the court is entitled to restrain conduct that is not in itself tortious or otherwise unlawful if it is satisfied that such a restriction is necessary in order to afford effective protection to the rights of the claimant in the particular case. Leggatt LJ makes the point that there is nothing objectionable in principle in using intention to define the defendants. There will be need for C to prove the purpose is to protest (otherwise the claim to commit would fail)

The proposed title of the Defendants do not fall foul of *Hampshire Waste*. "Persons intending to trespass or trespass" – this did not capture people whether or not on the land (too wide). This claim only seeks people whose purpose is to protest.

Draft Order

TMKC guided the Judge through the draft Orders sought.

- Description of D:-
    - bespoke wording "or on any flight therefrom"
    - the only plausible explanation is the purpose of protest at airport or aeroplane at airport or aeroplane.
    - "whether in connection with JSO or otherwise" – if persons disavowed the campaign.
- Judge explored why other groups were not included in the definition of Ds, and suggested that other groups of which Cs are aware be added to that definition. TMKC agreed with the Judge and obtained permission to amend the Claim Form and POC.
- Para 3, with immediate effect – sometimes says until [date] in the future. One way of giving effect of temporal certainty. Your ladyship's decision.
- Judge concluded that reviews after 24 months is too long, but will reduce to 12 months.
- Judge confirms that the claim is best to be served rather than notification.

Judgment at 15:34

Pursuant to Supreme Court's decision in *Wolverhampton* and the decision in *Valero*, principles are quite clearly set out now.

Cs are those who own 3 airports in the UK. Manchester, Stansted and East Midlands Airport. Ds who are persons unknown are those who, as described in POC, and which permission has been given to amend.

Ds are people who feel strongly that fossil fuel use should cease and are engaged in a campaign of protest at various locations. Already well reported protests have caused significant disruption. Those involved are active on the internet and have indicated that this particular summer they have an intention to continue this protest at airports (as seen in the evidence of Mr McBride and Wortley).

They intend to cause disruption in the summer and they consider this consider that this could be scope for some publicity for the campaign. In light of that Cs have brought applications such as these. Newcomer application, in the sense that the PU are those who cannot be identified but are identifiable by purpose. The sui generis were specifically addressed in *Wolverhampton* in the Supreme Court. The principles are much clearer and further clarified by Mr Justice Ritchie. In short form, Court must be satisfied that there is a compelling need for the injunction of this kind. I am satisfied that I have been taken very carefully through the areas of protection of injunctions has been sought. Referred to plans 1 and 2 in Manchester and Stansted, and 3 in East Midland. The land in question is owned by various Cs.

There are complications with claims for trespass, as there are various leases and licences which give right to others to occupy. Cs do not have an immediate right to possession and therefore the claim in trespass cannot be supported for all of the land.

Considerable work has been done by Cs. Land is in ownership of Cs. Premise is that if an injunction is granted only on basis of land which is owned, that would not provide a practical solution but by reference to authorities that Cs are entitled to these applications where it is necessary to make that which they seek effective. The risk is that any protestor will nonetheless threaten nuisance spilling out onto land they do own. There are examples of that already occurring for protestors within this category.

It is appropriate to do so in respect of all of this land shown on Plans 1, 2 and 3. And authorities make that quite straightforward. I have to be satisfied that there is a compelling need here. Satisfied here of compelling need.

Injunctions are necessary and proportionate and there is clear evidence of threat and intention to target airports, in a way that has already been targeted. Examples were given of Gatwick airport. Experience at Stansted with wire cutters. The threat is real and imminent and already manifested itself.

Consequences are of particular significance: Airports are sensitive places where security is paramount. This sort of disruption. Delay or disruption but also increased sensitivity from evidence of Mr McBride because targets for terrorists. Airports have to respond because this could be a mask for a terrorist activity. Damage to aircraft and other security issues and significant financial repercussions.

Also, I should take into account what arguments Ds might have raised. This is a without notice application and they are not here– it does not mean should not take that into account. Ds have been arrested for various criminal offences – Criminal Justice and Public Order Act and Public Order Act. Similarly, there are byelaws. The disadvantage is that they are enforceable after the action has taken place. The criminal system does not prevent action in the way that an injunction does. Scope for prosecution is not a remedy for Cs.

Should have said before that I have been referred to the point about tipping off and satisfied that appropriate to make the application without notice. The Claimants have not only given full and frank but have gone to some length to set out what might have been said. Included byelaws.

I am satisfied that necessary to make the injunctions and there is a compelling need.

Legal approach – I would cite the section of Mr Justice Ritchie in *Valero* – the matters I need to be satisfied about. Hard to see what particular harm to the PU in preventing them from carrying out the sort of protest over land which is privately owned.

In the interests of putting everything before the Court, Cs in Manchester Airport have referred to the fact that there are highways. There is a right to public generally and so therefore have to take into the rights of the protestors under the ECHR, particular Arts 10 and 11.

There is a need to consider when the balancing exercise that any interference is something which would cause me not to make this order. Right to peaceful protestation are to be protected do not include the deliberate and criminal behaviour which is the threat here.

The need remains compelling and any interference does not outweigh the need for the injunction.

Cs have agreed to provide a standard undertaking in damages. As part of the injunction, and if there is anyone they would be able to seek a remedy to damages.

In those circumstances, it is appropriate to make the orders sought. I should say that: appropriate for the definition of Ds to include any other organisation of which Cs are aware and have a website or email address.

This is not a case where it is appropriate to have an interim order with return in 2 weeks. As was set out in *Wolverhampton*, this is sui generis. As far as interim or final orders are concerned, anyone has a right to come and have the order discharged or varied. Indicated that this will be reviewed, rather than to last for, in 12 months, which is sufficient to cover off the threat. Reflect the sequential nature of the campaigns organised at various location.

Third parties with interests at the airports should be notified.

Hearing concluded at 16:00.

Case No: KB-2024-002132
Neutral Citation No.: [2024] EWHC 2247 (KB)

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
(KBD)

Royal Courts of Justice
Strand
London WC2A 2LL

Wednesday, 24 July 2024

BEFORE:

HHJ COE KC (Sitting as a Judge of the High Court)

BETWEEN:

MANCHESTER AIRPORT PLC AND OTHERS

Claimants

- and -

PERSONS UNKNOWN

Defendant

MR T MORSHEAD KC and **MS E BARDEN** appeared on behalf of the Claimants
The Defendant did not appear and was not represented

JUDGMENT

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1. HHJ Coe KC: This is an extemporary judgment; it is not comprehensive, and it is not going to be as detailed as some of the judgments in the authorities to which I have been referred. The reason I am able to deal with it in an extemporary and short form is twofold. Firstly, because pursuant to the decision of the Supreme Court in *Wolverhampton City Council* v *London Gypsies and Travellers [2023] UKSC 47 ("Wolverhampton")* and the subsequent decision of Ritchie J in *Valero Energy Limited v Persons Unknown* [2024] EWHC 134 (KB) ("*Valero*") , the principles are now quite clearly set out, despite the fact that these sorts of injunction applications are relatively new in jurisdictional terms. The second reason, is that I have the benefit of a very detailed and helpful skeleton argument on behalf of the claimants, which has gone, point by point, through the matters for and against the applications which I need to consider in deciding whether or not to make the orders sought.

2. In very short terms, the claimants own three airports in the UK: Manchester Airport; Stansted Airport; and East Midlands Airport. The defendants who are persons unknown - as described in the particulars of claim and in the draft order which I have given permission to amend - are people who feel strongly that the obtaining and use of fossil fuels should cease, and therefore they have engaged in a series of protests and campaigns of protest at various different locations.

3. In some instances, those already well reported incidents have produced significant disruption and in consequence injunctions have been granted to prevent further disruption. Those involved in these campaigns are active on the internet and their websites and so on, and have indicated that this particular summer of 2024, it is their intention to carry on these protests in similar fashion at UK airports.

4. I have seen the witness evidence from Mr McBride and Mr Wortley in particular setting out the details and the wording that has been used by those who have made these posts. It could not be clearer that they intend to bring home their message by causing disruption in the summer, in particular when there is a lot more air traffic with people going on holiday, and so on. They consider that this would give scope for some increased publicity to bring the public's attention to their campaign.

5. It is in light of this published intention that the claimants bring these applications. They are of the sort described in *Wolverhampton* as "newcomer" applications, in the sense that the persons unknown are those who cannot be identified by name, but who form an identifiable group of people by reason of their purpose and intention, as well as their past behaviour and their future plans.

6. These **sui generis** claims were specifically addressed in the *Wolverhampton* case in the Supreme Court and the principles identified there are now much clearer and as I say, have been further clarified by Ritchie J, and therefore in very short form rather than simply the balance of convenience, *American Cyanamid* sort of test. The court has to be satisfied that there is a compelling need for an injunction in a case of this kind, which has effectively become the key question.

7. I am satisfied first of all that I have been taken very carefully through the geographical areas in respect of which the protection of injunctions are sought, and so I have seen in particular, Plan 1 in relation to Manchester Airport, Plan 2 in relation to Stansted, and Plan 3 in relation to East Midlands which identify the land which is owned by the various, relevant claimants.

8. It is right to say that there are some complicating features in terms of simply bringing these claims in trespass as one would ordinarily do, because within those areas of land owned by the claimants there are various leases, licences and perhaps other arrangements which give rise to a right to occupy to others and therefore, the claimants properly acknowledge that they do not have an immediate right to possession and therefore, in trespass to protect against the threat of trespass. Considerable work has been done to set those details out and I have been referred to the title plans, and to the breakdown of the specific parts of each airport.

9. However, I am satisfied that the land itself as identified is in the ownership of the claimants. This application is made on the premise that if the injunctions were granted only on the basis of the land that is owned and to which there is a right of possession, it will not provide an effective solution. Again, by reference to the authorities it seems to me first of all that the claimants are entitled to make these applications where they are necessary in order to make the protection which they seek against trespass effective.

10. Secondly, the risk is that (albeit not on land to which the named claimants have a right of possession) any protest of the kind in respect of which injunctions are sought could spill out effectively onto the land to which the claimants do have the right to possession, and against which they are entitled to protection from nuisance. I have been given examples of how that has in fact already occurred in respect of the protestors who fall within this category of defendant.

11. I am satisfied that if it is appropriate to grant the injunctions sought, it is appropriate to grant them in respect of all of the land identified, that is, the areas identified in Plans 1, 2 and 3 to which I have been referred. The authorities make it quite straightforwardly clear that I have to be satisfied that there is a compelling need here, and I am satisfied on the basis of the evidence, in particular of Mr Wortley, who has identified the risks here that these injunctions are necessary and proportionate and that there is a compelling need for them.

12. In saying that, first of all as I have already refereed to, there is clear evidence that there is a threat, indeed an intention to target airports, in the way that other airports and other enterprises and oil terminals, infrastructure and highways, have already been targeted in a disruptive way. The example that I have been given in respect of Gatwick Airport, is that people arrived with bandages apparently intending to block [access] and that there have been experiences at Stansted of people going through the perimeter fence with wire cutters and spraying aeroplanes orange. The threat is real, and it is imminent, and in some respects, it is already manifest.

13. Secondly, that the consequences of such protests (as far as airports are concerned) is of particular significance and importance. Airports are sensitive places where security is paramount, and we are all perfectly well aware of that, and if there is this sort of disruption or protest, not only does it have a significant knock-on effect or ripple effect in terms of busy airports, so that delay or disruption to even one flight is likely to affect many others, and therefore many other passengers.

14. Also, there is an increased sensitivity which is identified for me in this case from the evidence of Mr McBride in that even peaceful protests on an airport is a problem because airports are targets for terrorist organisations, and therefore airports have to

respond as if this could be a much more serious security threat and of course as has been pointed out to me, such a protest could in fact be a mask for a terrorist incident.

15. There is, of course, the danger of damage to aircraft, and not only security issues, but other significant financial repercussions which have a long-term effect.

16. Therefore, I am satisfied that there is a compelling need for the relief sought.

17. It is also right that I should take into account what arguments the defendants here might have raised, if they had been present. This is a without notice application, but it does not mean there is not an obligation to take those arguments into account, particularly where these protests have involved individuals being arrested for criminal offences. There are various criminal offences to which I have been referred including those in the Criminal Justice and Public Order Act 1994, the Public Order Act 2023 which now makes it an offence to affix oneself to an object on the land and the offence of aggravated trespass.

18. Similarly, there are byelaws at Stansted, Manchester and East Midlands which are intended to prevent: the obstruction of emergency exits; demonstrations; people loitering on the land; people refusing to leave when they are asked to do; and so on. The disadvantage from the claimants' point of view of the byelaws and the criminal law generally, is that they only are enforceable after the action has taken place. In other words, they do not prevent the threat or the action in the way that an injunction would, and that is in my view a significant and particularly importance difference in this situation.

19. There is a world of difference between waiting for somebody to breach the criminal law, or the byelaws and then prosecuting them, preventing this sort of action in the first place. The scope that there is for prosecution and sentence is not a remedy which would prevent the threat which is what this injunction application is all about.

20. I should have said before that since this is a without notice application, I have been referred already to the point about tipping off, and I am satisfied that it is appropriate to make this application without notice and for me to consider it without notice. I am also

satisfied that as is apparent from the claimant's skeleton argument and from the submissions that have been made to me in a really very comprehensive way, the claimants have not only dealt with full and frank disclosure, but have gone to some lengths to set out what might have been said on behalf of the defendants. For example, the inclusion in the bundle of the various byelaws from the airports and reference to them deals with one such issue.

21. In those circumstances, I am satisfied that it is necessary to grant the injunctions and that there is a compelling need for them. The correct legal approach is already covered in terms of the authorities that I have been referred to. I would cite the section of Ritchie J's judgment in *Valero*, which seems to me to set out as the claimants' skeleton argument has done, the matters I need to be satisfied about. In particular, it is hard to see at the moment what particular harm there could be to the persons unknown in preventing them from carrying out the sort of disruptive protests that are threatened, and which have been committed before. That is certainly the case in respect of the land, which is privately owned, or in private possession. However again, in the interests of putting everything before the court that they need to, the claimants in respect of Manchester Airport have also referred me to the fact that there are two highways within the land which has been identified, and clearly therefore there is a right to the public without permission to go onto those two highways.

22. I therefore have also to take into account the rights of the potential protestors and have regard to the European Convention on Human Rights, in particular articles 10 and 11. I need to consider whether or not in performing the overall balancing exercise, and in deciding whether or not the compelling need remains, or whether any interference with those rights is something which should cause me to not to make these orders.

23. There is a right to go onto a highway, and there is a right to protest on a highway, but that is a right to peaceful protest. The rights which are to be protected do not include the sort of deliberate and potentially unlawful, criminal behaviour which is the real basis of the threat here. In the circumstances, it seems to me that having considered that as far as Manchester is concerned, the need is compelling and any question of any interference with those rights does not outweigh the need for the injunction.

24. I am also of course aware of the fact - and it has been referred to most recently in submissions - that the claimants give a standard undertaking in damages as part of the injunction application, and if there is anybody who considers that their rights have been interfered with, to such an extent that they would be able to bring a claim and seek a remedy and damages then they are still entitled to. The claimants have given the appropriate undertaking in respect of any such right which is found to have been breached and in respect of which loss is found to have been caused.

25. In those circumstances, it seems to me that it is appropriate to make the orders sought. Having gone through the orders with counsel, first of all it seems to me that it is appropriate to amend the definition of those unknown persons, to include any other organisation of which the claimants are aware, and in respect of which they have any website or email address. I say that because the definition of identification is important, even though it is apparent in this case that it is not simply certain identified organisations, it is nonetheless important that those who otherwise might be similarly minded are included.

26. Secondly, whilst this is not the sort of application where in my view it is appropriate for example to make an interim order with a return date in two weeks' time or so as far as interim or final injunction orders are concerned, there is no distinction in the sense that anybody affected has the right to come to court and seek to have the order discharged, set aside or varied. That is the position here.

27. In those circumstances, what I have indicated is that this is an injunction which is to be reviewed after, rather than to last for, a period of 12 months. That seems to me to be a sufficient period of time to cover off the nature of the threat which has been identified, namely when there are most flights out of airports, but also to reflect the somewhat sequential nature of the kind of campaigns that have been organised at various different locations.

28. I also made it clear that those third parties who are not claimants here but do have a right to possession of various parts of the airports, should also be notified in case they have any reason to ask for any part of these orders to be discharged or varied.

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

Claim no: KB-2024-002132

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) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) PLC
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD



Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

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 5 July 2024 by HHJ Coe KC ("**the HHJ Coe KC Order**")

AND UPON the Claimants' application dated 2 June 2025

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 HHJ Coe KC Order

IT IS ORDERED that:

1. The HHJ Coe KC Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 4 of the HHJ Coe KC Order).

2. Paragraph 4 of the HHJ Coe KC Order is amended so as to read:

"This Order is subject to periodic review by the Court on application by the Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

KB-2024-001765 / KB-2024-002132 / KB-2024-002317 / KB-2024-002473

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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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 Dienne 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

N244

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-2024-002132**
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
	H W F - - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Manchester Airport Plc and Others	
Defendant's name (including ref.) Persons unknown (as more particularly described in the Claim Form)	
Date	2 June 2026

HIGH COURT OF JUSTICE
02 Jun 2026
QUEEN'S BENCH DIVISION

KB-2024-002132
Sub Event ID: 30

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

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 Her Honour Judge Coe KC dated 5 July 2024 ("**the Coe HHJ 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.

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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 Coe HHJ Orders are attached, together with the Bourne J Orders.

2. The Bourne J Orders and the Coe HHJ Orders together provide that:

   a) the injunctions granted pursuant to the Coe HHJ 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 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	Month	Year
2	June	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

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BEFORE: MRS JUSTICE STACEY DBE

DATED: 15 June 2026

BETWEEN:-

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) PLC
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LIMITED
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

HIGH COURT OF JUSTICE 15 Jun 2026 QUEEN'S BENCH DIVISION

KB-2024-002132

Claimants

- v -

PERSONS UNKNOWN AS DESCRIBED IN THE CLAIM FORM

Defendants

ORDER

UPON the Claimants' claim by the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024

AND UPON the making of an injunction by order dated 5 July 2024 by Her Honour Judge Coe K.C.("**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 on 24 June 2026 or a date thereafter as soon as is convenient for the Court, 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.

Wright, Alexander

From: KB Judges Listing Office <KBJudgesListingOffice@Justice.gov.uk>
Sent: 19 June 2026 15:48
To: Wright, Alexander; Owen, Elin; EvershedsCourtClerk; Stuart Wortley - New Mailbox (2026); 'NawaazAllybokus@eversheds-sutherland.com'; a@eversheds.com; Martin, Steve
Subject: KB-2024-002132 Manchester Airport PLC and others -v- Unknown and others

Dear all,

In accordance with the Order of Mrs Justice Stracey dated 15th 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

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

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

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 5 July 2024, Her Honour Judge Coe KC granted injunctions to restrain the Defendants from entering, occupying or remaining on Manchester Airport, Stansted Airport and East Midlands Airport until varied, discharged or extended by further order ("**the 2024 Orders**") – copies of which are exhibited at **Exhibit AJW1**.

1.5 Paragraph 4 of the 2024 Orders provided for each of those injunctions 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 injunctions granted pursuant to the 2024 Orders were 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 David McBride dated 4 July 2024 made on behalf of the First Claimant ("**the David McBride Statement**");

1.8.2 the witness statement of Stuart Wortley dated 4 July 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 David McBride Statement and the S Wortley Statements.

2.2 For present purposes it is sufficient to note that the injunctions were sought and obtained:

2.2.1 to protect Manchester Airport, Stansted Airport and East Midlands 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 Orders in respect of Manchester Airport, Stansted Airport and East Midlands 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 ORDERS AND THE 2025 ORDERS

3.1 The 2025 Orders are substantively on the same terms and provide:

3.1.1 at paragraph 1, that the 2024 Orders "*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)*"; and

3.1.2 at paragraph 2 for a variation to paragraph 4 of the 2024 Orders.

3.2 The 2024 Orders, as varied by the 2025 Orders, are substantively on the same terms and provide:

3.2.1 for the injunction to take "*immediate effect*" and until "*unless varied, discharged or extended by further order…*"; and

3.2.2 at paragraph 4:

"*This Order is subject to periodic review by the Court on application by the Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day*".

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 Orders and the 2024 Orders (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 Orders, in so far as they relate to Manchester Airport, Stansted Airport and East Midlands Airport, were served in accordance with paragraph 10 of the 2024 Orders by:

4.1.1 a copy of the relevant 2025 Order being uploaded to each of the individual airports' injunction websites. I have been informed by David McBride of Manchester Airports Group (to which Manchester Airport, Stansted Airport and East Midlands Airport belong) that a copy of the relevant 2025 Order was uploaded by a relevant member of staff to each of the individual airports' injunction websites on 30 June 2025. Printouts from each of the individual airports' injunction websites are exhibited at **Exhibit AJW4**, confirming that a

copy of the relevant 2025 Order was uploaded and continues to be available on those websites; and

4.1.2 the continuing presence of warning notices at the locations marked with an "X" on the plans to the 2024 Orders (being the plans at **Exhibit AJW5**), which I cover further below at paragraph 4.4; and

4.1.3 whilst not strictly required under the terms of the 2024 Orders, affixing a copy of the 2025 Orders at the locations marked with an "X" on the plans to the 2024 Orders (being the plans at **Exhibit AJW5**). I have been informed by David McBride that a copy of the 2025 Order was so affixed at the relevant locations for each of the individual airports during the course of the week commencing 30 June 2025

4.2 In addition to the above steps, paragraph 10 of the 2024 Orders required a copy of the 2025 Orders to be served by an email sent to each of the email addresses listed in Schedule 3 to the 2024 Orders. 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 Orders by email on 9 June 2026, a copy of which is exhibited at **Exhibit AJW6**.

4.4 I am told by David McBride, Head of Legal for the Manchester Airports Group (to which Manchester Airport, Stansted Airport and East Midlands Airport belong) that a regime is in place at each of the respective airports 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 Orders.

5. THE AIRPORT BYELAWS AND PLANS

5.1 The injunctions granted in this action and in actions 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) would not be entitled to legal possession – including for example highways land and areas which are demised to third parties).

5.2 The injunctions in this case currently extend to the land edged red on Plan 1 (Manchester Airport), Plan 2 (Stansted Airport) and Plan 3 (East Midlands Airport) to the 2024 Orders – a copy of the relevant plans are exhibited at **Exhibit AJW7**.

5.3 I am informed by David McBride, Head of Legal for the Manchester Airports Group and other members of his in-house legal team that:

5.3.1 the East Midlands Airport Byelaws 2001 have been replaced with the East Midlands Airport Byelaws 2025 – a copy of which is exhibited at **Exhibit AJW8**. I address the East Midlands Airport Byelaws 2025 more fully in the next section immediately below;

5.3.2 the Plan attached to the East Midlands Airport Order dated 5 July 2024 remains accurate; and

5.3.3 there have been no changes to the:

5.3.3.1 Manchester Airport Byelaws 2024 and that the Plan attached to the Manchester Airport Order dated 5 July 2024 remains accurate; and

5.3.3.2 Stansted Airport – London Byelaws 1996 and that the Plan attached to the Stansted Airport Order dated 5 July 2024 remains accurate.

5.3.4 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 each of the relevant airports for a further 12 months.

6. THE EAST MIDLANDS AIRPORT BYELAWS 2025

6.1 A comparison of the East Midlands Airport Byelaws 2001 and the East Midlands Airport Byelaws 2025 has been undertaken and I attach as an Appendix to this witness statement a table detailing the relevant provision(s) in the East Midlands Airport Byelaws 2025 as against the equivalent provision(s) from the East Midlands Airport Byelaws 2001 as referred to in the David McBride Statement.

6.2 In addition to the above provisions, the following provisions of the East Midlands Airport Byelaws 2025 are considered relevant and applicable and I therefore draw attention to them:

3.34	***No unauthorised demonstrations, etc:*** *No person shall organise or take part in any demonstration, procession or public assembly which has not been pre-notified to and pre-approved by the Airport Company and /or that in the opinion of a Constable or Airport Official could or could continue to obstruct or interfere with the proper use of the Airport or the safe or efficient use of the Airport by any person or organisation or which could or could continue to obstruct or interfere with the comfort, convenience and / or safety of passengers or persons using the Airport.*
3.15	***Wearing of passes*** *No person, other than a bona fide airline passenger, while in a Restricted Area shall fail to wear a pass issued to them by or on behalf of the Airport Company so that it is clearly visible at all times.*
3.27	***Camp / Loitering*** *No person shall camp on the Airport in a tent, trailer, caravan or otherwise, nor shall any person loiter, frequent or remain on the Airport without reasonable cause*
3.35	***No unauthorised flags or banners, etc****:* *No person shall display any flags, banners or emblems which in the opinion of a Constable or Airport Official may cause or continue to cause offence or a breach of the peace on any part of the Airport, or which are likely to cause offence or a breach of the peace on any part of the Airport.*

3.36	***Access to Airport*** *No person shall enter the Airport except for a bona fide purpose and no person shall remain at the Airport once that purpose has been discharged.*
3.37	***Persons required to leave*** *No person shall remain on the Airport after being requested by a Constable or an Airport Official to leave. No Constable or Airport Official shall request a person to leave unless (a) that person has caused or is, in the reasonable opinion of the requesting Constable or Airport Official, about to cause a disturbance (including using language or making gestures which are lewd, foul or offensive), or (b) has committed or is, in the reasonable opinion of the requesting Constable or Airport Official, about to commit an offence (including a breach of these Airport Byelaws); or (c) after, having entered the Airport for a bona fide purpose, have completed their bona fide purpose for entering the Airport. Nothing in this paragraph shall prejudice the operation of other byelaws pertaining to the removal or evacuation of persons from the Airport.*
4.24	***Graffiti*** *No person shall create graffiti upon any wall, structure, floor or pavement or any surface forming part of or used in relation to the Airport.*

6.3 As explained in the David McBride Witness Statement, at paragraph 26, there is no plan attached to the East Midlands Airport Byelaws 2001. There is a plan attached to the East Midlands Airport Byelaws 2025, the boundary of which is the same as the boundary shown on the plan attached to the East Midlands Airport Order dated 5 July 2024.

6.4 The Claimants will also re-amend paragraph 14 of the amended Particulars of Claim so as to refer to the provision in paragraph 3.34, 3.36 and 3.37 of the East Midlands Airport Byelaws 2025 and to update the amended Particulars of Claim so as to reflect the terms of the East Midlands Airport Byelaws 2025 more generally.

6.5 A formal application to make such re-amendment(s) will be made by the Claimants alongside or shortly following the filing/service of this witness statement.

7. HEALTH AND SAFETY RISK / RISK OF HARM

7.1 The health and safety risks and risks of harm presented by direct/unlawful protest activity at the airports in question are detailed in the David McBride Statement. By way of summary, however, these include but are not limited to:

7.1.1 the Claimants' ability, at their respective airports, to ensure:

7.1.1.1 the safe operation of aircraft;

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

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

7.1.2 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;

7.1.3 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

7.1.4 impacting counter-terrorism and police operations at the respective airports.

7.2 I understand from David McBride that the potential implications for counter-terrorism operations at the respective airports 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**.

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

7.3.1 the previous evidence of David McBride, Head of Legal at Manchester Airport Group, in these proceedings as set out at paragraph 55 in the David McBride Statement:

"*55. All airports are a potential target for terrorist activity (which explains why the airport is routinely patrolled by police carrying firearms) meaning:-*

55.1. there is heightened security and any activity which is out of the normal is particularly dangerous. Any protest activity could be interpreted (whether correctly or not) by the security services at airports as a potential threat, meaning that the police or security services may intervene with significant knock-on effects. If the protestors pose no security or counter-terrorism threat, that would be a distraction for the police and our security team and a diversion of resources which are necessary for the counter-terrorism work they carry out to keep members of the public safe; and

55.2 there is also always the potential that the protests are, or turn, violent or are, in fact, used as cover for actual terrorist attacks".

7.3.2 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…"

7.3.3 the recent incident at Southend Airport, referred to further below at paragraph 14.2, 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.

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

8.1 I am informed by David McBride, Head of Legal for the Manchester Airports Group that there have been no incidents of unlawful protests at Manchester Airport, Stansted Airport and East Midlands Airport since the 2025 Review Hearing. I have been informed by Rebecca Bainbridge, Senior Legal Counsel, and member of David McBride's team that peaceful protests have been facilitated and held in the period since at Manchester Airport:

8.1.1 on 21 October 2025, by an individual protesting for PIA (Pakistan International Airlines); and

8.1.2 between 30 October - 2 November 2025, as part of industrial action against Aer Lingus.

8.2 I further understand from Ms Bainbridge that there is a planned protest by PETA (People for the Ethical Treatment of Animals) on 14 July 2026.

8.3 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.

8.4 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.

9. **ENVIRONMENTAL / CLIMATE CAMPAIGN GROUPS**

9.1 *Just Stop Oil (JSO)*

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

9.1.1.1 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

9.1.1.2 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.

9.1.2 I note that:

9.1.2.1 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 9.2), 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**.

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

9.1.2.3 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**.

9.1.3 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*".

9.2 <u>*Take Back Power*</u>

9.2.1 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**).

9.2.2 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**).

9.2.3 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**.

9.2.4 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: • 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**.

9.2.5 A clear target of the Take Back Power group is the 'super-rich'. This gives rise to particular concern for the Claimants and the subject airports because:

9.2.5.1 there are private jet facilities at all of the subject airports and indeed at all of the airports which are the subject of the Claims;

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

9.2.5.3 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 8.3 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

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

9.2.6 I am instructed that the Claimants are accordingly very concerned that their airports will become the focus of direct action by members of Take Back Power, given the presence of private jet facilities at their respective airports, in the absence of the continuation of the protection afforded by the injunction.

9.3 *Extinction Rebellion*

9.3.1 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.

9.4 *Fossil Free London*

9.4.1 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**.

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

9.5 *Youth Demand*

9.5.1 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**.

9.6 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.

9.7 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.

10. OTHER AIRPORT INJUNCTION PROCEEDINGS

10.1 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

10.2 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.

11. **WIDER INJUNCTION PROCEEDINGS**

11.1 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.

12. **DETERRENT EFFECT OF THE INJUNCTIONS**

12.1 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 Orders. In asking the Court to continue the injunctions granted by the 2024 Orders, 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 the airports in question.

12.2 Noting the continued lack of direct/unlawful protest activity at the airports in question, 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 injunctions so that they are not at risk of proceedings for contempt of court. I would also draw attention to:

12.2.1 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*".

12.2.2 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 injuncted area, in order to avoid the risk of associated penalties for breaching of the injunction."*

12.3 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:

12.3.1 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

12.3.2 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;

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

12.3.4 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;

12.3.5 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

12.3.6 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**.

13. **RESPONSE TO THE CLAIMS**

13.1 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.

13.2 I am informed by David McBride that the Claimants are not aware of the identity of any individuals who threaten to engage in direct/unlawful protest activity at their respective airports.

14. **FULL AND FRANK DISCLOSURE**

14.1 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.

14.2 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".

14.3 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 7 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.

15. CONCLUSION

15.1 I am informed by David McBride that the Claimants' directors have concluded that they should respectfully request the Court to order that the injunctions remain in full force and effect, subject to a review in 12 months' time as provided by the 2024 Orders. I understand that they reached this decision 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 injunctions are continued in full force and effect, subject to a review in 12 months' time, the Claimants will reassess matters afresh next year.

15.2 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 the subject airports and/or causing a private or public nuisance on or around them if the injunctions were now to be lifted.

15.3 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.

15.4 The Claimants consider that the injunctions have 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 their respective airports. It is for this reason that they seek the injunctions remain in full force.

15.5 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.

16. NOTICE OF THE REVIEW HEARING

16.1 The Claimants intend to give notice of the review hearing in the manner provided for in paragraph 5 of the 2024 Orders – namely by:

16.1.1 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;

16.1.2 sending copies of the documents referred to in the previous paragraph to the email addresses referred to in Schedule 3 to the 2024 Orders plus the following additional email addresses:

16.1.2.1 info@takebackpower.net and press@takebackpower.net which are understood to be linked to Take Back Power;

16.1.2.2 shut the system info@proton.me, which is understood to be linked to Shut the System;

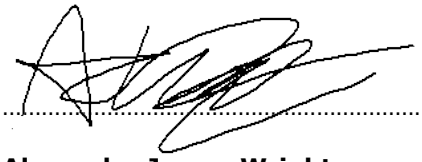
16.1.2.3 campaigner@fossilfreelondon.org and operations@fossilfreelondon.org which are understood to be linked to Fossil Free London; and

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

16.1.3 affixing a notice at each of the warning notice locations at each 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.



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Alexander James Wright

Legal Director, Eversheds Sutherland (International) LLP

11 June 2026

Appendix 1

East Midlands Airport Byelaws 2001		East Midlands Airport Byelaws 2025	
3(15)	*No person shall in the airport intentionally obstruct:- (a) any airport official in the proper execution of his duties; (b) any person carrying out an act which is necessary to the proper execution of any contract with the company; or (c) any other person in the proper use of the airport, or behave so as to give reasonable grounds for annoyance or offence to other persons in the airport.*	3.10	***Obstruction and Interference*** *No person shall intentionally or recklessly obstruct or interfere with the proper use of the Airport or with any person acting in the execution of their duty in relation to the operation of the Airport or pursuant to any applicable legislation, including the conveyance of passengers, their baggage and other goods, the security and safety of passengers, and the maintenance and servicing of Aircraft.*
		4.13	***Not to cause annoyance*** *No person shall sing, dance, shout, play a musical instrument, operate a Portable Entertainment Device, use a laser pen or otherwise behave in such a way as to give reasonable cause for annoyance to any other person and no person shall fail to cease such activities when reasonably requested by an Airport Official or Constable.*
3(12)	*No person shall remain on the airport, or any part thereof, after having been requested by an airport official or a constable to leave and no constable or airport official shall request a person to leave unless he has reasonable grounds to believe that that person has committed or is about to commit a breach of a byelaw or a criminal offence or that that person's removal is required on grounds of fire, other dangers or security at the airport.*	3.37	***Persons required to leave*** *No person shall remain on the Airport after being requested by a Constable or an Airport Official to leave. No Constable or Airport Official shall request a person to leave unless (a) that person has caused or is, in the reasonable opinion of the requesting Constable or Airport Official, about to cause a disturbance (including using language or making gestures which are lewd, foul or offensive), or (b) has committed or is, in the reasonable opinion of the requesting Constable or Airport Official, about to commit an offence (including a breach of these Airport Byelaws); or (c) after, having entered the Airport for a bona fide purpose, have completed their bona fide purpose for entering the Airport. Nothing in this paragraph shall prejudice the operation of other byelaws pertaining to the removal or evacuation of persons from the Airport.*
		3.38	***Person not to return for 24 hours*** *No person having left the Airport at the request of a Constable or Airport Official shall re-enter the Airport for a period of twenty-four hours thereafter, unless such re-entry is authorised in writing by the Constable or Airport Official issuing the*

			original request to leave (or in their absence the Airport Company).
3(14)	*No person shall enter the airport (except as a bona fide airline passenger) whilst having been prohibited from entering by a constable or an airport official.*	3.39	***Prohibited Persons*** *No person shall enter the Airport whilst having been temporarily or permanently prohibited from doing so by the Airport Company. A person who has either:* *(a) in the opinion of the Airport Company acted in breach of these byelaws, or committed any other offence on Airport premises or involving the Airport's activities or operations; or* *(b) been issued with a caution by the police in respect of such an offence;* *may be excluded from the Airport permanently or for a set period of time, such exclusion to be determined by the Airport Company at its discretion and set out in writing by the Airport Company to the person.*
3(18)	*No person shall obstruct any of the emergency exits at the airport.*	3.13	***Emergency Exits*** *No person shall obstruct or tamper with any of the emergency exits at the Airport*
4(3)	*No person on foot, or whilst driving or propelling a vehicle, shall, except as reasonably necessary in the case of an emergency, neglect, fail or refuse to comply with an indication or direction given by a constable or an airport official or by a notice or sign exhibited by order of the company where the indication, direction or notice is given or erected for the purpose of preventing an obstruction within the airport, of regulating vehicular traffic within the airport, prohibiting or restricting access to any part of the airport or avoiding a danger to any persons or property.*	3.25	***Compliance with Signs or directions*** *No person, whether on foot or whilst driving or propelling a Vehicle, shall neglect, fail or refuse to comply with an indication or direction given by a Constable or Airport Official or Sign exhibited by or on behalf of the Airport Company.*
5(7)	*No person shall fail to comply with any notice prohibiting or restricting access to any building, road or any part of the airport.*	4.10	***Prohibition Notice*** *No person shall fail to comply with any Sign prohibiting or restricting access to any building, road, or any part of the Airport.4.11*
5(8)	*No person shall climb any wall, fence, barrier, railing or post.*	4.11	***Climbing etc.***

			No person shall climb any wall, fence, barrier, railing or post.
5(10)	*No person shall erect or use any apparatus for transmission, receipt, recording reproduction or amplification of sound, speech or images.*	4.14	***Apparatus*** *No person shall erect or use any apparatus for transmission, receipt, recording, reproduction or amplification of sound, speech or images for:* *4.14.1 commercial purposes; or* *4.14.2 for any purpose in a Security Search Area or at Border Force controls.*
5(11)	*No person shall enter or leave the airport otherwise than through a gate or entrance for the time being provided by the company for that purpose.*	4.17	***Entering or leaving the Airport*** *No person shall enter or leave the Airport otherwise than through a gate or entrance or exit for the time being provided by the Airport Company for that purpose.*
		4.12	***Cutting or destroying etc*** *No person shall cut, damage, or destroy any wall, fence, barrier, railing or post located on or within the Airport.*
5(12)	*No person shall enter any part of the airport to which members of the public are not for the time being admitted.*	4.16	***Restricted Access*** *No person shall:* *4.16.1 enter any part of the Airport to which members of the public are not for the time being admitted;* *4.16.2 drive a Vehicle Airside elsewhere than in a place provided for the passage or accommodation of such a Vehicle;* *4.16.3 except in an emergency, enter or remain on any part of the Airport Company's premises which is marked by a Sign exhibited in a conspicuous position on or near such part of the premises as being not available for entry or for use; or* *4.16.4 with or without a Vehicle enter that part of the Airport known as the aircraft manoeuvring area without first obtaining the permission and clearance of Air Traffic Control.*
5(14)	*No person shall affix bills, advertisements, posters, notices or stickers upon any wall, structure, floor or pavement or any surface forming part of, or used in relation to, the airport, except on premises which the person so affixing is authorised to occupy and in accordance with*	4.19	***Display signs / signage:*** *No person shall post, distribute or display any notice, advertisement, sign, circular or other written or printed matter, except on premises which the person posting, distributing or displaying it, is authorised*

	the terms of his occupation thereof.		*to occupy, and in accordance with the terms of their occupation thereof.*
7(3)	*No person shall without lawful authority or reasonable cause or excuse … enter or climb upon, or attempt to enter or climb upon, any building at the airport not open to the public.*	4.11	*See 4.11 above.*
		4.16.1	*See 4.16.1 above.*
7(4)	*No person shall without lawful authority or reasonable cause or excuse … 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.*	4.2	***Entering Aircraft*** *No person except an Airport Official or Constable shall enter or climb upon an Aircraft without the written consent of the Aircraft owner or the Airport Company.*
		3.5	***Tampering with aircraft*** *No person shall move or use or tamper with any Aircraft or anything used in connection with any Aircraft without lawful authority or reasonable cause or excuse.*
7(5)	*No person shall without lawful authority or reasonable cause or excuse … enter or get on or attempt to enter or get on any vehicle, truck, trolley or aircraft steps or tamper with the brake or other part of its mechanism.*	3.6	***Tampering with equipment*** *No person shall tamper with or misuse any mechanical, electrical or other apparatus used in connection with the operation of the Airport or the access of persons or Vehicles to any part of the Airport.*
		4.5	***Airport Equipment*** *No person shall operate, use, move or disturb any Airport equipment except with the written consent of, or at the instruction of, the Airport Company.*

For ease of review, relevant definitions from the East Midlands Airport Byelaws 2025 referred to above include:

1. "**Air Traffic Control**" means the service provided by air traffic controllers who direct Aircraft on the ground and through controlled airspace and can provide an advisory service of Aircraft in uncontrolled airspace;

2. "**Aircraft**" means a heavier than air power-driven flying machine and includes aeroplane (land plane), aeroplane (sea plane), aeroplane (amphibian),aeroplane (self-launching motor glider), powered lift (tilt rotor) and rotorcraft (helicopter and gyroplane);

3. "**Airport** means the area of land constituting East Midlands Airport edged in redline on the plan attached at Schedule 1, including: all areas of the Airport accessible to the public, Airport users, third party suppliers and contractors and their personnel, all areas of the Airport accessible to Aircraft, including runways, taxiways, aprons and all grass areas;

4. "**Airport Company** means East Midlands International Airport Limited (registered in England and Wales under company number 02078271) and any successor to it as airport operator (as that term is defined in the Airports Act 1986), and where the context so

requires references in these byelaws to the Airport Company shall include a reference to any person engaged (whether by employment or otherwise) by the Airport Company;

5. "**Airport Official** means in relation to any matter, a person authorised to act on behalf of the Airport Company;

6. "**Airport Security Pass**" means a security pass issued by the Airport Company which grants Pass the holder authorised access to certain identified areas of the Airport, subject to the terms and conditions which accompany the Airport Security Pass;

7. "**Constable** means any person having the powers and privileges of a police constable, a traffic police community support officer or a police community support officer;

8. "**Sign** means any object or device (whether fixed or portable) for conveying warnings, information, requirements, restrictions, instructions or prohibitions of any description;

9. "**Vehicle** means any mechanically propelled conveyance or manually operated apparatus on wheels and includes trailers, items of plant that operate as wheeled vehicles and as static apparatus but does not include an Aircraft or passenger baggage

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

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.

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

HIGH COURT OF JUSTICE
08 Jul 2024
QUEEN'S BENCH DIVISION
KB-2024-002132

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it 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 the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON HEARING Leading and Junior Counsel for the Claimants

AND UPON each of the First, Second and Third Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

IT IS ORDERED THAT:

DEFINITIONS

1. "**Manchester Airport**" means the land shown outlined in red on Plan 1 to the Claim Form (including the highways therein), appended to this Order in Schedule 1 ("**Plan 1**").

2. "**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (https://www.manchesterairport.co.uk/injunction/) at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the First Defendants and each of them are forbidden from doing the following:

    a. Entering, occupying or remaining on any part of Manchester Airport without the consent of the First, Second and Third Claimants (or any of them);

    b. Affixing themselves to any other person or object on Manchester Airport;

    c. Impeding access to or enjoyment of Manchester Airport by the First, Second and Third Claimants (or any of them) and those authorised by the First, Second and Third Claimants (or any of them), whether by blocking any entrance or otherwise;

    d. Blocking or obstructing the free and safe passage of traffic onto or along or across the highways within Manchester Airport;

    e. Refusing to leave the aforesaid parts of the highways when asked to do so by a police constable, when contravening any of paragraphs 3(b) and/or (d);

    f. Continuing to do any act prohibited by paragraphs 3(a) to (e) above.

4. This Order is subject to periodic review by the Court on application by the First, Second and Third Claimants at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First, Second and Third Claimants shall take the following steps by way of service of copies of the amended

Claim Form, amended Particulars of Claim, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") upon the First Defendants:

a. Uploading a copy onto the following website: https://www.manchesterairport.co.uk/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. 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.

6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the First Defendants by the First, Second and Third Claimants carrying out each of the following steps:

a. Uploading a copy of the Order onto the following website: https://www.manchesterairport.co.uk/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.

7. The taking of such steps set out at paragraph 5 and 6 shall been good and sufficient service of this Order and of the Claim Documents upon the First Defendants and each of them.

8. The Court will provide sealed copies of this Order to the First, Second and Third Claimants' solicitors for service (whose details are set out below).

9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

10. Service on the First Defendants of any further applications or documents in the proceedings by the First, Second and Third Claimants (or any of them) shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).

11. Anyone 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 First, Second and Third Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com . If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the First, Second and Third Claimants' solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

13. The First, Second and Third Claimants (or any of them) have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FIRST, SECOND AND THIRD CLAIMANTS

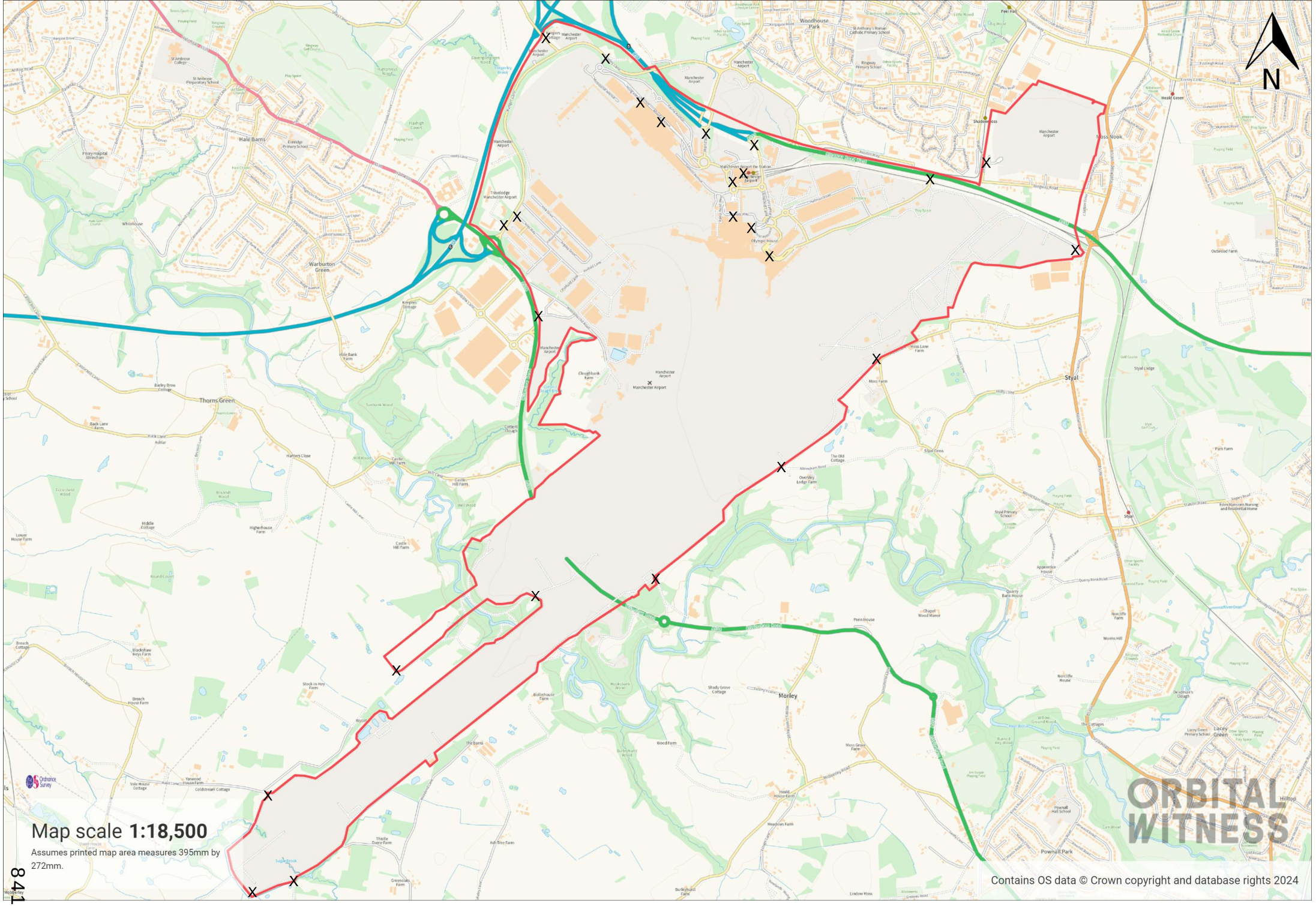
16. The First, Second and Third Claimants' solicitors and their contact details are:

(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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1


N
Map scale 1:18,500
Assumes printed map area measures 395mm by 272mm.
Contains OS data © Crown copyright and database rights 2024
ORBITAL WITNESS

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST, SECOND AND THIRD

(1) The First, Second and Third Claimants will take steps to serve the First Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.

(2) The First, Second and Third 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 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

TO: Persons Unknown whose purpose is or includes protest on the premises at Manchester Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

FROM: Manchester Airport Plc, Airport City (Manchester) Ltd, and Manchester Airport Car Park (1) Limited ("the **First, Second and Third Claimants**")

This notice relates to the land known as Manchester Airport, Manchester, M90 1QX which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the First, Second, and Third Claimants

2. Affixing themselves to any other person or object on the Airport.

3. Impeding access to or enjoyment of the Airport by the First, Second and Third Claimants or those authorised by the First, Second, and Third Claimants, whether by blocking access to any entrance or otherwise.

4. Blocking or obstructing the free and safe passage of traffic onto or along or across those parts of the highway show the red line outlined on the Plan;

5. Refusing to leave the parts of the highways on the Plan when asked to do so by a police constable, when contravening any paragraph 1 and/or 4.

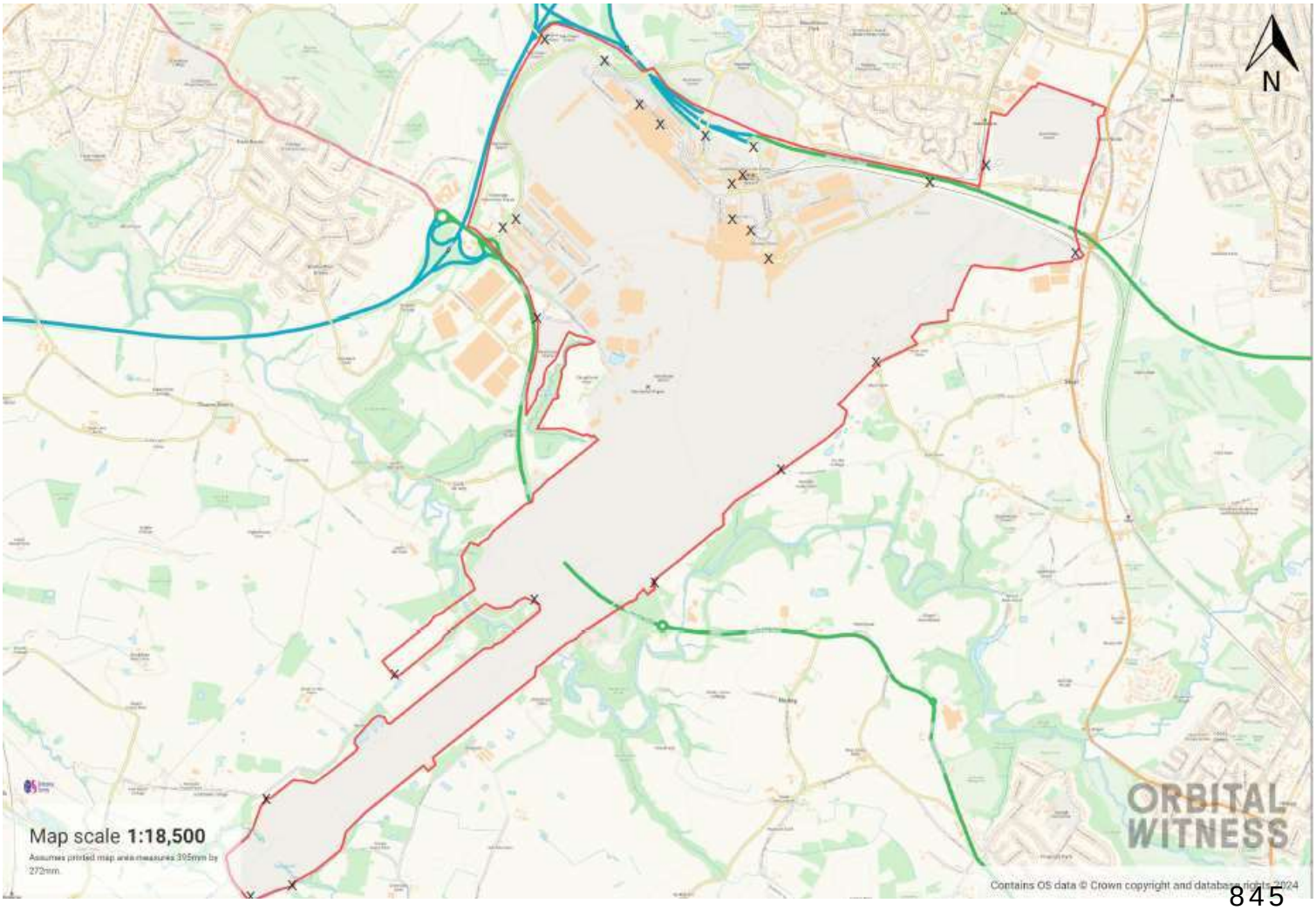
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First, Second and Third Claimants solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: https://www.manchesterairport.co.uk/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email: StuartWortley@eversheds-sutherland.com



CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

HIGH COURT OF JUSTICE
08 Jul 2024
QUEEN'S BENCH DIVISION
KB-2024-002132

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it 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 the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

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

IT IS ORDERED THAT:

DEFINITIONS

1. "**Stansted Airport**" means the land shown in red outlined in red on Plan 2 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

2. "**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (https://www.stanstedairport.com/injunction/) at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the Second Defendants and each of them are forbidden from doing the following:

    a. Entering, occupying or remaining on any part of Stansted Airport without the consent of the Fourth Claimant;

    b. Affixing themselves to any other person or object on Stansted Airport;

    c. Impeding access to or enjoyment of Stansted Airport by the Fourth Claimant and those authorised by the Fourth Claimant, whether by blocking any entrance or otherwise;

    d. Continuing to do any act prohibited by paragraphs 3(a) to (c) above.

4. This Order is subject to periodic review by the Court on application by the Fourth Claimant at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Fourth Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") upon the Second Defendants:

    a. Uploading a copy onto the following website: https://www.stanstedairport.com/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. Affixing a notice at those locations marked with an "X" on Plan 2 setting out where these documents can be found and obtained in hard copy.

6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the Defendants by the Claimant carrying out each of the following steps:

a. Uploading a copy of the Order onto the following website: https://www.stanstedairport.com/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 2.

d. Affixing Warning Notices of A2 size at those locations marked with an "X" on Plan 2.

7. The taking of such steps set out at paragraph 5 and 6 shall been good and sufficient service of this Order and of the Claim Documents upon the Second Defendants and each of them.

8. The Court will provide sealed copies of this Order to the Fourth Claimant's solicitors for service (whose details are set out below).

9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

10. Service on the Second Defendants of any further applications or documents in the proceedings by the Fourth Claimant shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).

11. Anyone 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 Fourth Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Fourth Claimant's solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

13. The Fourth Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FOURTH CLAIMANT

16. The Fourth Claimant's solicitors and their contact details are:

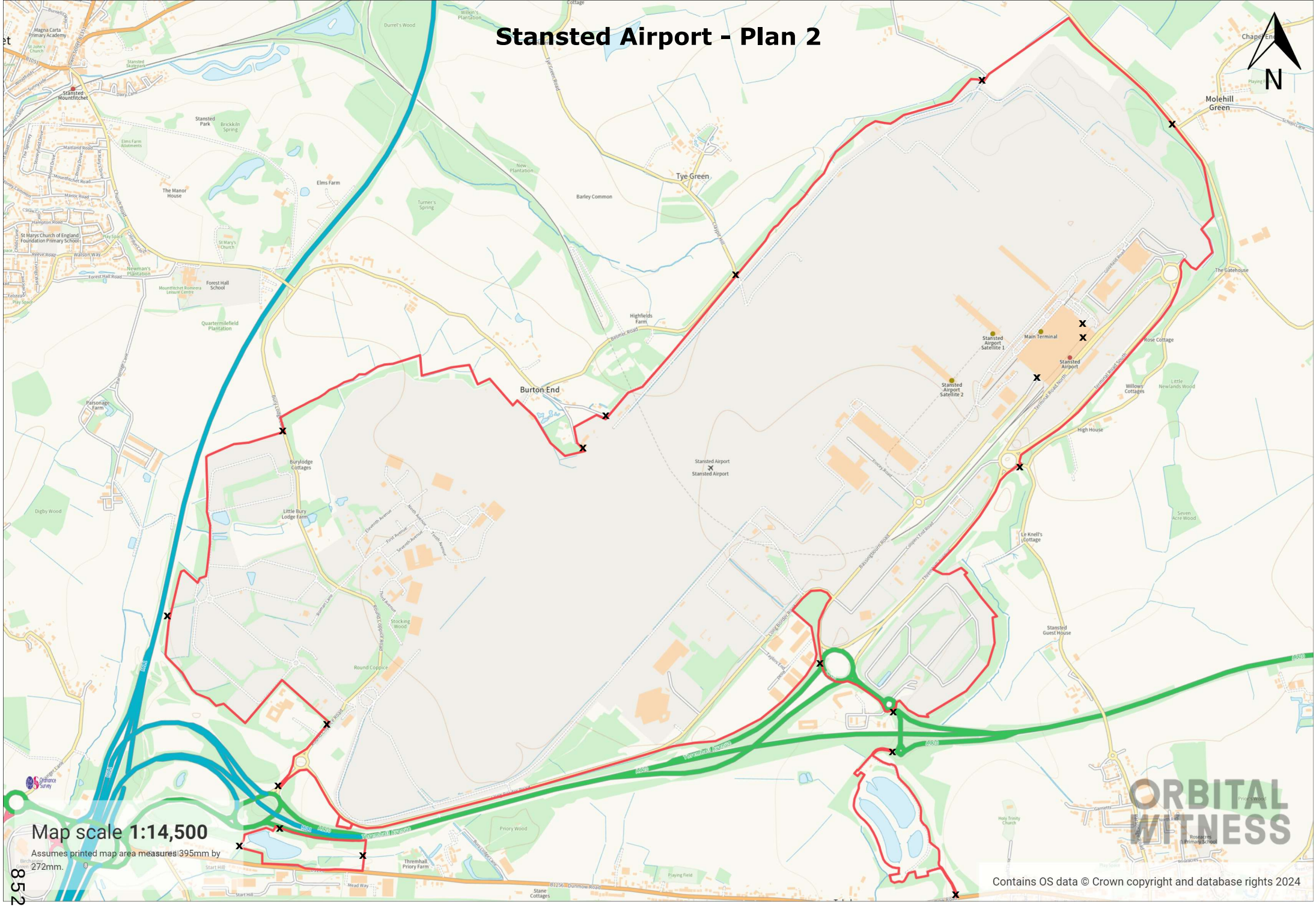
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Stansted Airport - Plan 2



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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FOURTH CLAIMANT

(1) The Fourth Claimant will take steps to serve the Second Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.

(2) The Fourth Claimant 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 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

TO: Persons Unknown whose purpose is or includes protest on the premises at Stansted Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

FROM: Stansted Airport Ltd ("the **Fourth Claimant**")

This notice relates to the land known as Stansted Airport, Stansted, CM24 1QW which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the Fourth Claimant

2. Affixing themselves to any other person or object on the Airport.

3. Impeding access to or enjoyment of the Airport by the Fourth Claimant or those authorised by the Fourth Claimant, whether by blocking access to any entrance or otherwise.

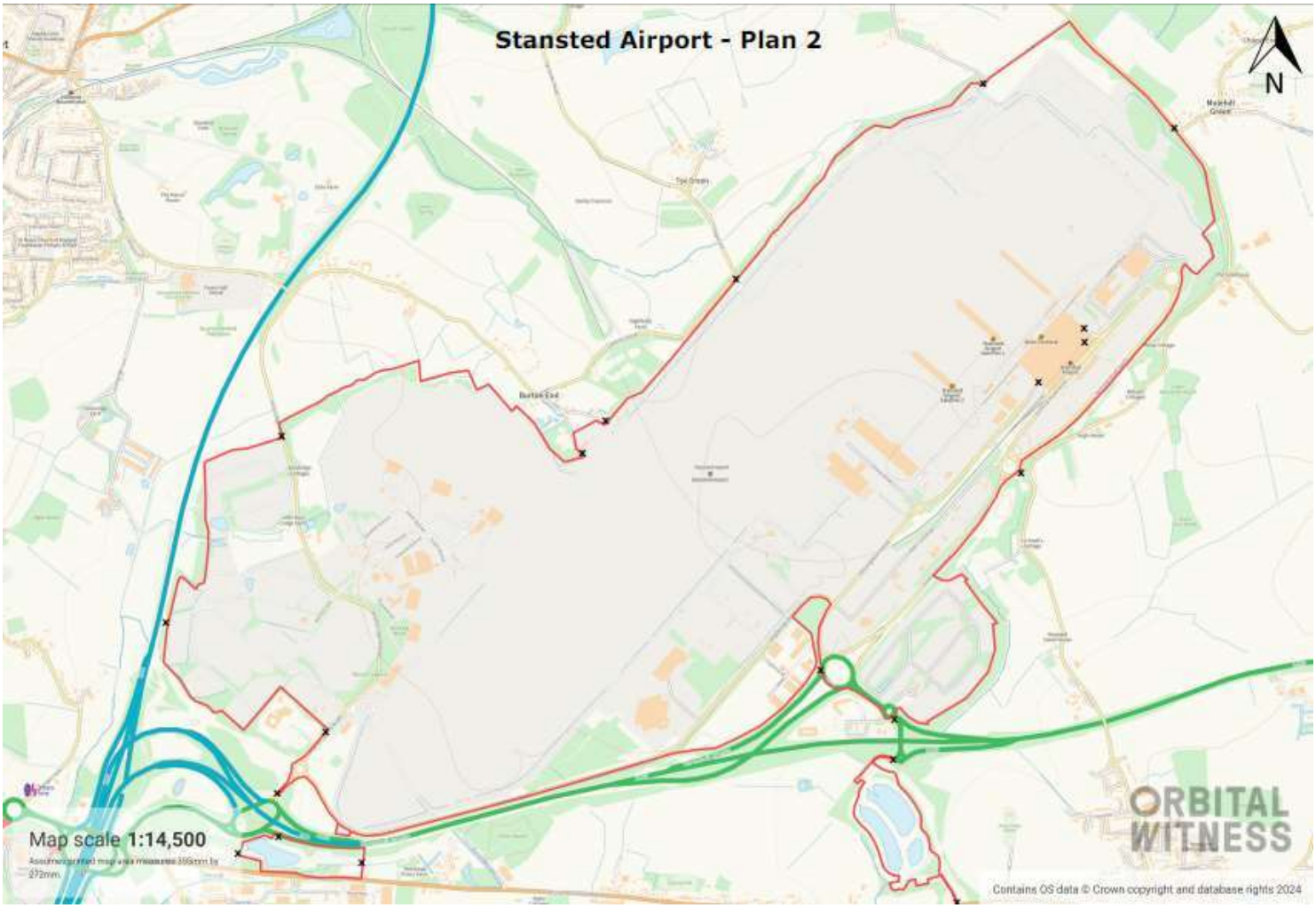
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fourth Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: https://www.stanstedairport.com/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-



(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) **PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it 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 the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

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

IT IS ORDERED THAT:

DEFINITIONS

1. "**East Midlands Airport**" means the land shown in red outlined in red on Plan 3 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

2. "**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (https://www.eastmidlandsairport.com/injunction/) at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the Third Defendants and each of them are forbidden from doing the following:

    a. Entering, occupying or remaining on any part of East Midlands Airport without the consent of the Fifth Claimant;

    b. Affixing themselves to any other person or object on East Midlands Airport;

    c. Impeding access to or enjoyment of East Midlands Airport by the Fifth Claimant and those authorised by the Fifth Claimant, whether by blocking any entrance or otherwise;

    d. Continuing to do any act prohibited by paragraphs 3(a) to (c) above.

4. This Order is subject to periodic review by the Court on application by the Fifth Claimant at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Fifth Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") upon the Third Defendants:

    a. Uploading a copy onto the following website: https://www.eastmidlandsairport.com/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. Affixing a notice at those locations marked with an "X" on Plan 3 setting out where these documents can be found and obtained in hard copy.

6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the Third Defendants by the Fifth Claimant carrying out each of the following steps:

a. Uploading a copy of the Order onto the following website: https://www.eastmidlandsairport.com/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 3.

d. Affixing Warning Notices of A2 size at those locations marked with an "X" on Plan 3.

7. The taking of such steps set out at paragraph 5 and 6 shall been good and sufficient service of this Order and of the Claim Documents upon the Third Defendants and each of them.

8. The Court will provide sealed copies of this Order to the Fifth Claimant's solicitors for service (whose details are set out below).

9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

10. Service on the Third Defendants of any further applications or documents in the proceedings by the Fifth Claimant shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).

11. Anyone 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 Fifth Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Fifth Claimant's solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

13. The Fifth Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FIFTH CLAIMANT

16. The Fifth Claimant's 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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

East Midlands - Plan 3

Injunction Area

N

0 500 m 1000 m

ORBITAL WITNESS

Contains OS data © Crown copyright and database rights 2024

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIFTH CLAIMANT

(1) The Fifth Claimant will take steps to serve the Third Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.

(2) The Fifth Claimant 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 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

HIGH COURT CLAIM NO: KB-2024-002132

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

TO: Persons Unknown whose purpose is or includes protest on the premises at East Midlands International Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

FROM: East Midlands International Airport Ltd ("the **Fifth Claimant**")

This notice relates to the land known as East Midlands International Airport, Castle Donnington, Derby, DE74 2SA which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the Fifth Claimant

2. Affixing themselves to any other person or object on the Airport.

3. Impeding access to or enjoyment of the Airport by the Fifth Claimant or those authorised by the Fifth Claimant, whether by. blocking access to any entrance or otherwise.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fifth Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: https://www.eastmidlandsairport.com/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

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.

Claim no: KB-2024-002132

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) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) PLC
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants



-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

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 5 July 2024 by HHJ Coe KC ("**the HHJ Coe KC Order**")

AND UPON the Claimants' application dated 2 June 2025

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 HHJ Coe KC Order

IT IS ORDERED that:

1. The HHJ Coe KC Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 4 of the HHJ Coe KC Order).

2. Paragraph 4 of the HHJ Coe KC Order is amended so as to read:

"This Order is subject to periodic review by the Court on application by the Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

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.

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)

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 Dienne 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

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

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.

Manchester Airport Injunction



Injunction

On 24 June 2025 the High Court extended the injunction.

Documents relating to the review hearing can be found on the links below:

Supplemental Hearing Bundle

Skeleton Argument

Chronology

Injunction Order – extension

Airport Injunction Renewal – 24.06.25

Injunction Order

On 5 July 2024 the High Court granted us an injunction, which prohibits anyone from entering, occupying or remaining on Manchester Airport in connection with the Just Stop Oil campaign (or any other environmental campaign) without our permission.

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.

Injunction Order

Third Party Order

Hearing Bundle

Skeleton Argument

Note of Hearing

Sealed Amended Claim Form

Amended Particulars of Claim

London Stansted Airport Injunction



Injunction

On 24 June 2025 the High Court extended the injunction.

Documents relating to the review hearing can be found on the links below:

Supplemental Hearing Bundle

Skeleton Argument

Chronology

Injunction Order – extension

Injunction Order

On 5 July 2024 the High Court granted us an injunction, which prohibits anyone from entering, occupying or remaining on London Stansted Airport in connection with the Just Stop Oil campaign (or any other environmental campaign) without our permission.

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.

Injunction Order

Third Party Order

Hearing Bundle

Skeleton Argument

Note of Hearing

Sealed Amended Claim Form

Amended Particulars of Claim

East Midlands Airport Injunction



Injunction

On 24 June 2025 the High Court extended the injunction.

Documents relating to the review hearing can be found on the links below:

Supplemental Hearing Bundle

Skeleton Argument

Chronology

Injunction Order – extension

Injunction Order

On 5 July 2024 the High Court granted us an injunction, which prohibits anyone from entering, occupying or remaining on East Midlands Airport in connection with the Just Stop Oil campaign (or any other environmental campaign) without our permission.

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.

Injunction Order

Third Party Order

Hearing Bundle

Skeleton Argument

Note of Hearing

Sealed Amended Claim Form

Amended Particulars of Claim

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

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(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

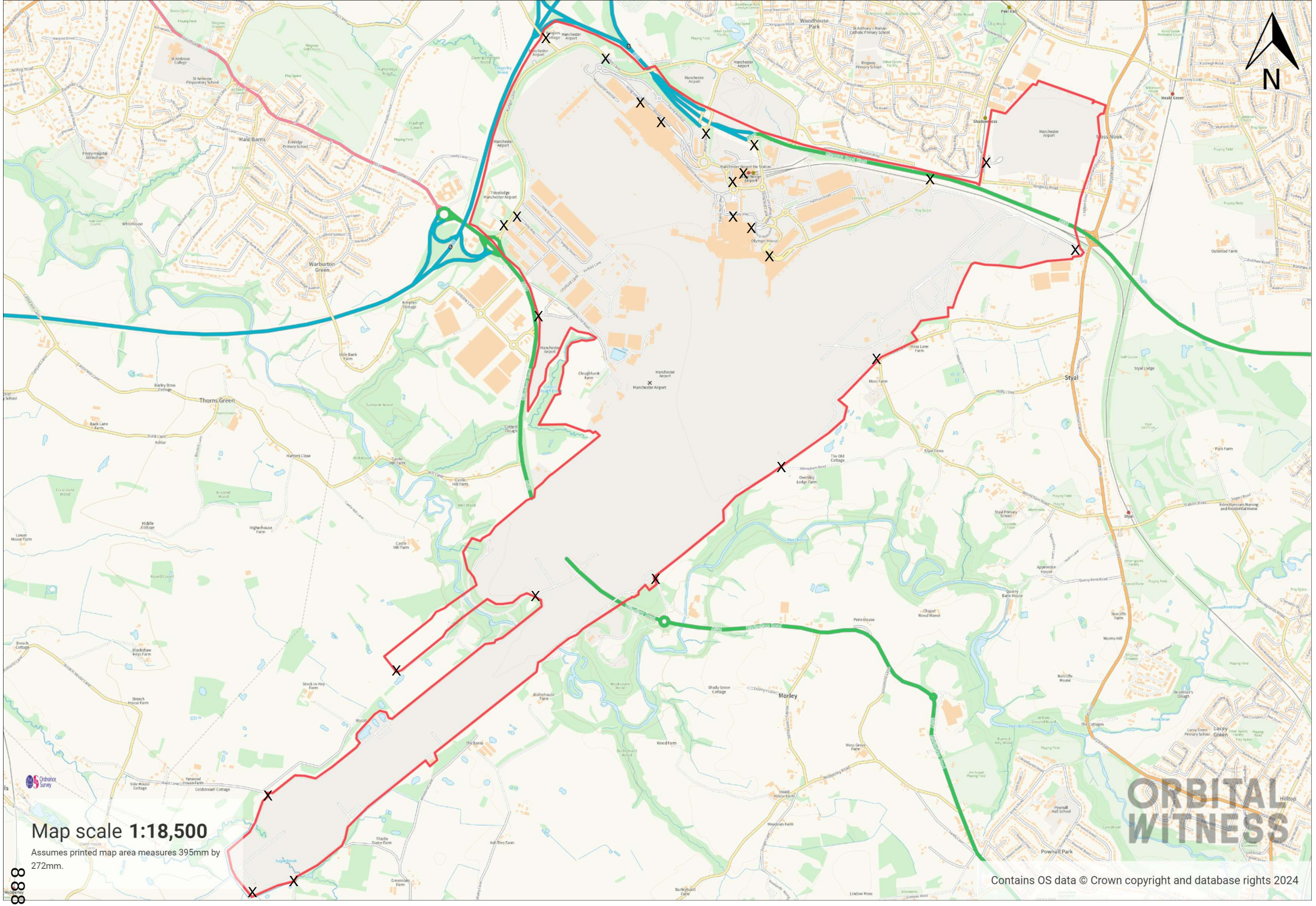
- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW5

This is the exhibit marked "AJW5" in the witness statement of Alexander James Wright.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Assumes printed map area measures 395mm by 272mm.
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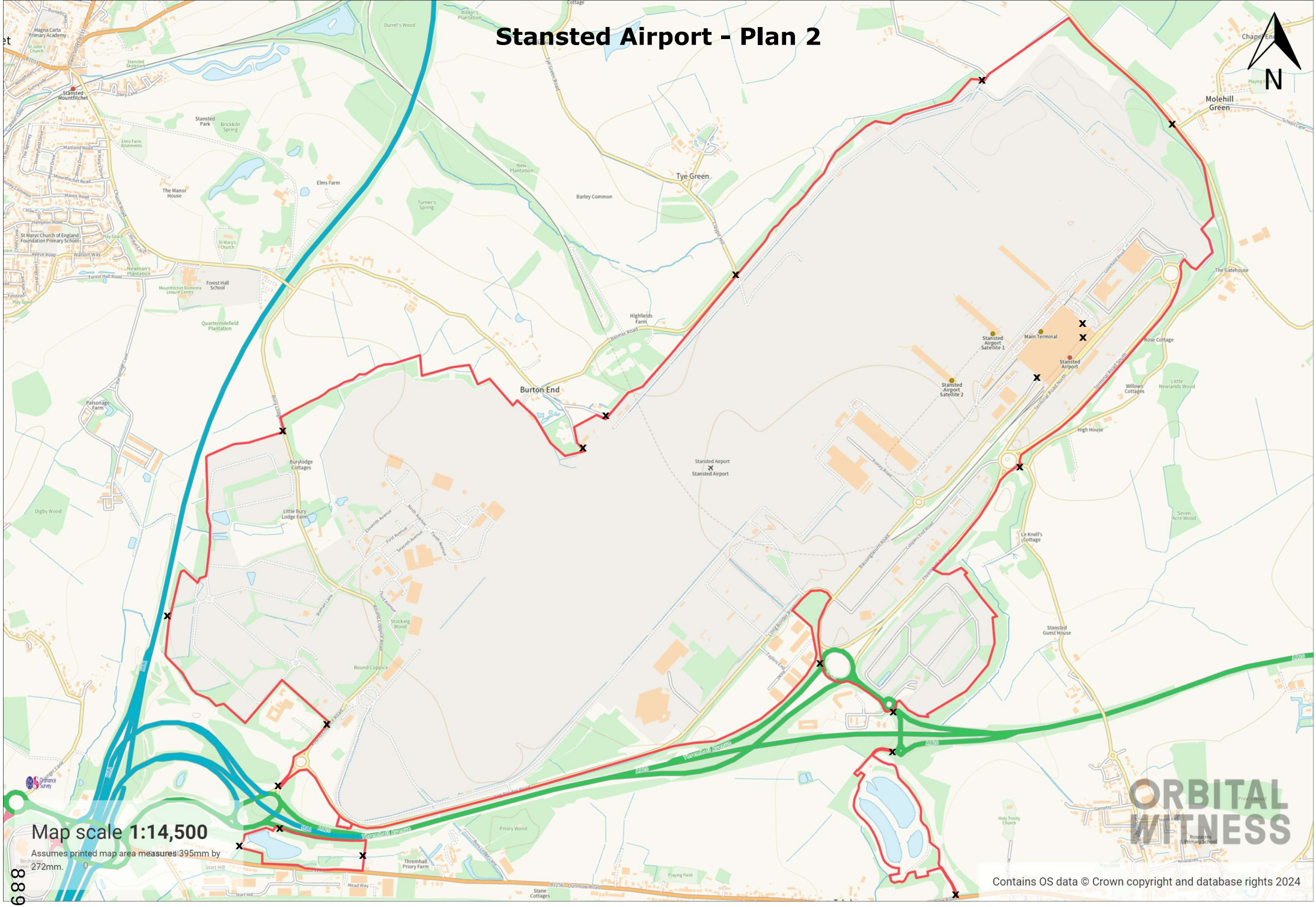
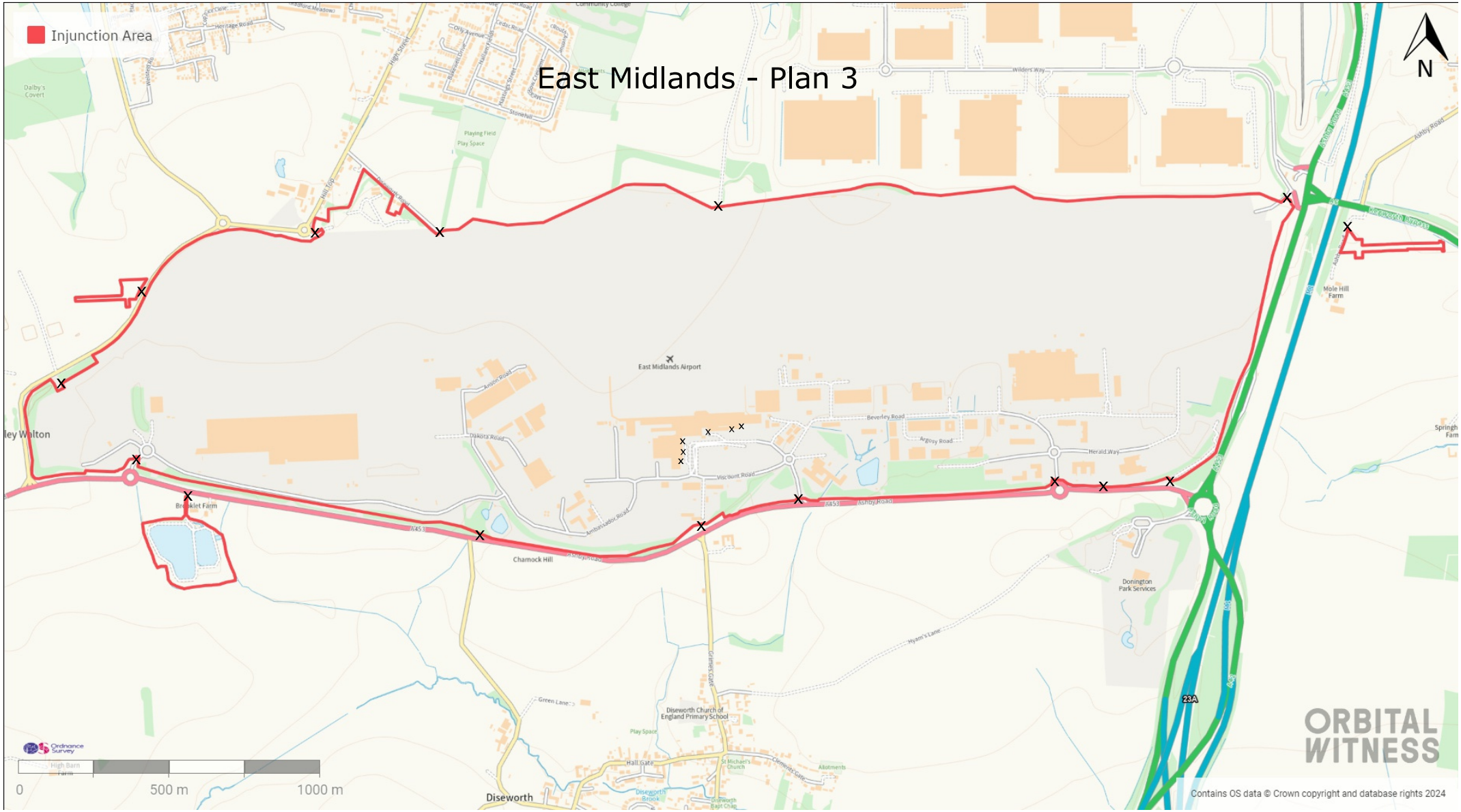
ORBITAL WITNESS

Stansted Airport - Plan 2

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East Midlands - Plan 3
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East Midlands Airport
Chamock Hill
Diseworth
Donington Park Services
Mole Hill Farm
Breaklet Farm
Diseworth Church of England Primary School
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500 m
1000 m
ORBITAL WITNESS
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068

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
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(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

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: Manchester Airport, Stansted Airport and East Midlands Airport Injunction - Order from 2025 Review Hearing (24 June 2025)
Attachments: Manchester Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329808.1).pdf; East Midlands Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329813.1).pdf; Stansted Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329810.1).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 injunctions granted in these proceedings by Order dated 5 July 2024 by HHJ Coe KC.

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 each 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
Manchester Airport	KB-2024-2132	Injunction | Manchester Airport
London Stanstead Airport		London Stansted Airport Injunction | London Stansted Airport
East Midlands Airport		Injunction | East Midlands Airport

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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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: Manchester Airport, Stansted Airport and East Midlands Airport Injunction - Order from 2025 Review Hearing (24 June 2025)
Attachments: Manchester Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329808.1).pdf; East Midlands Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329813.1).pdf; Stansted Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329810.1).pdf

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East Midlands Airport		Injunction | East Midlands Airport

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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www.eversheds-sutherland.com

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CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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Claimants

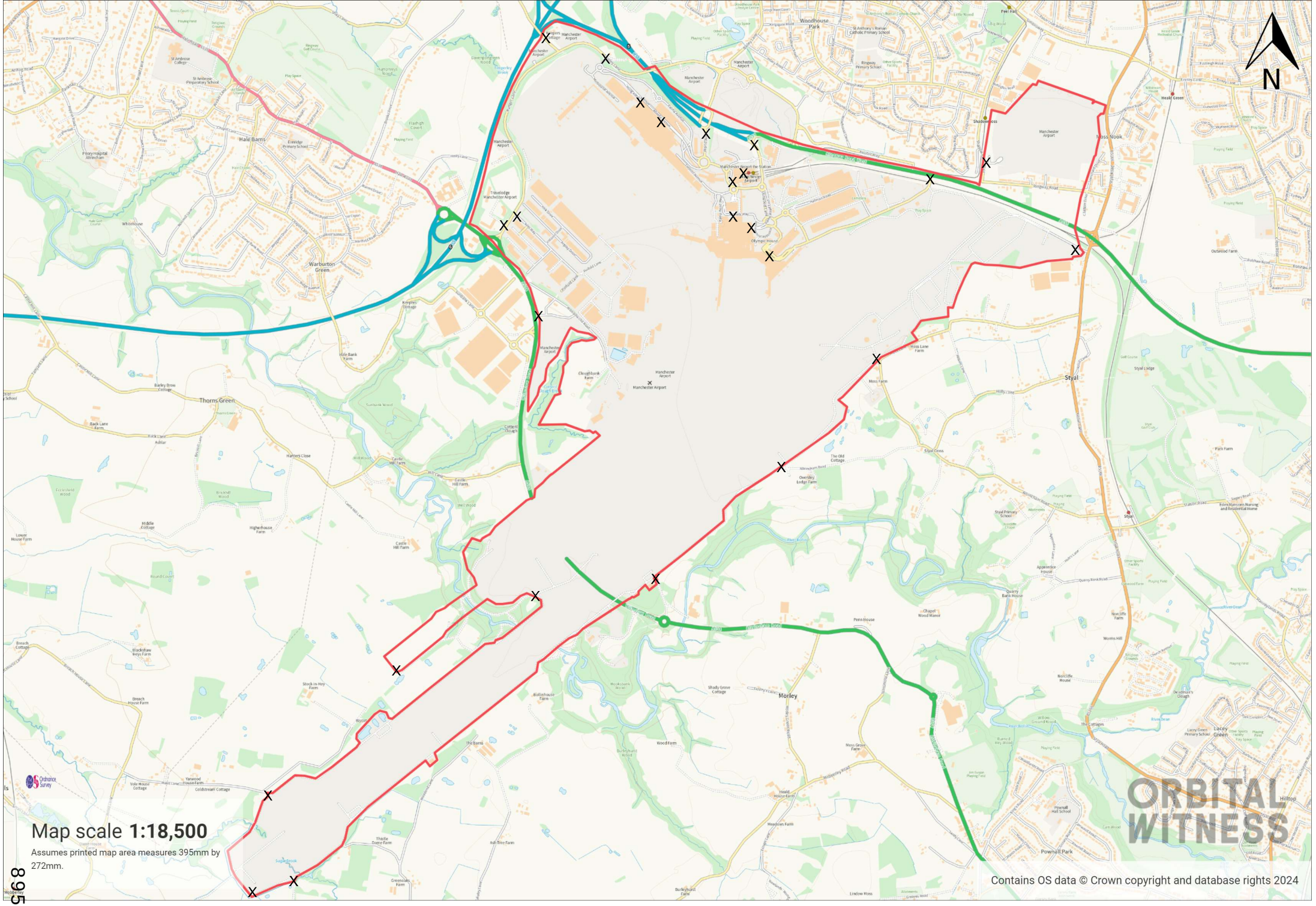
- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW7

This is the exhibit marked "AJW7" in the witness statement of Alexander James Wright.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Assumes printed map area measures 395mm by 272mm.
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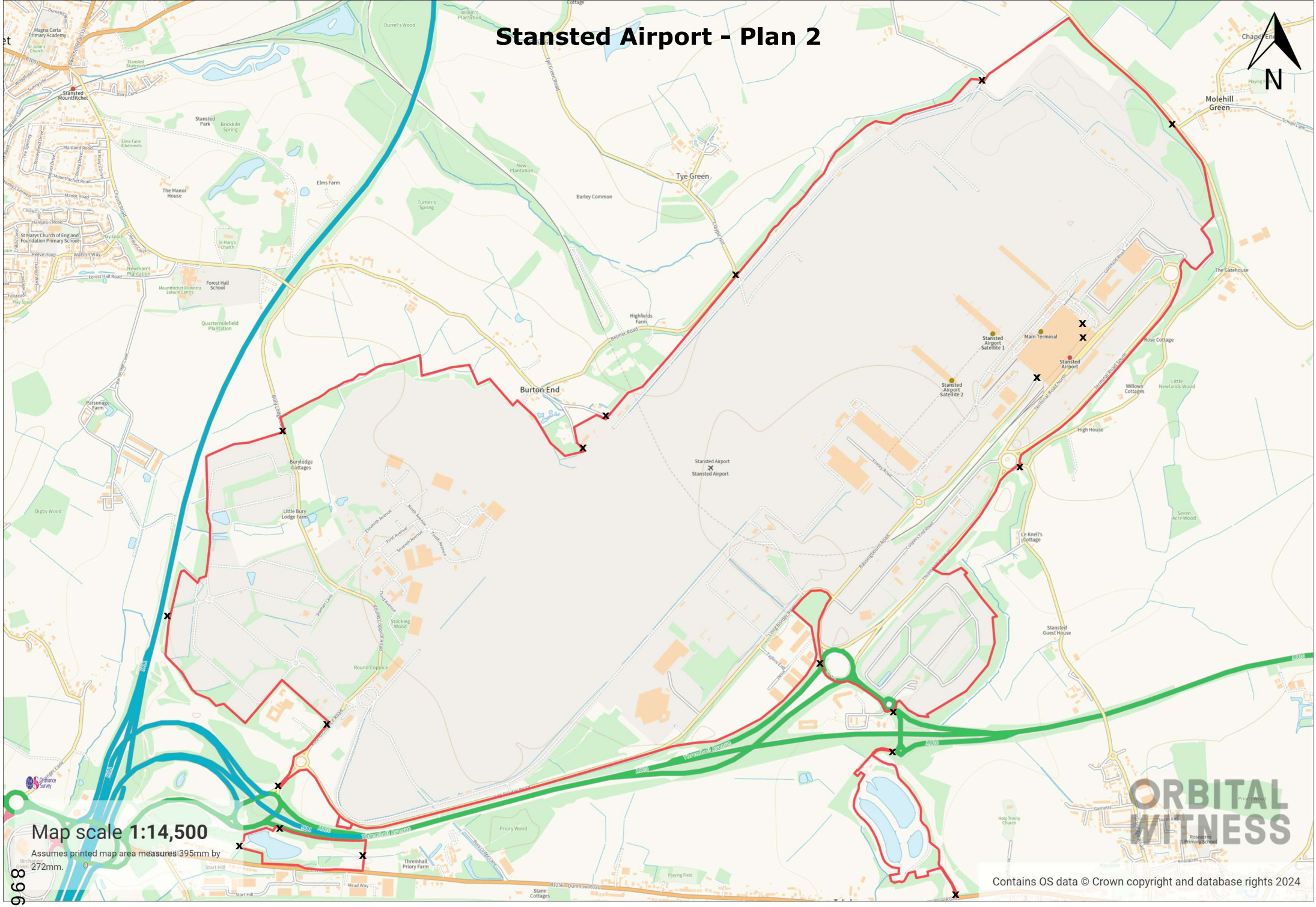
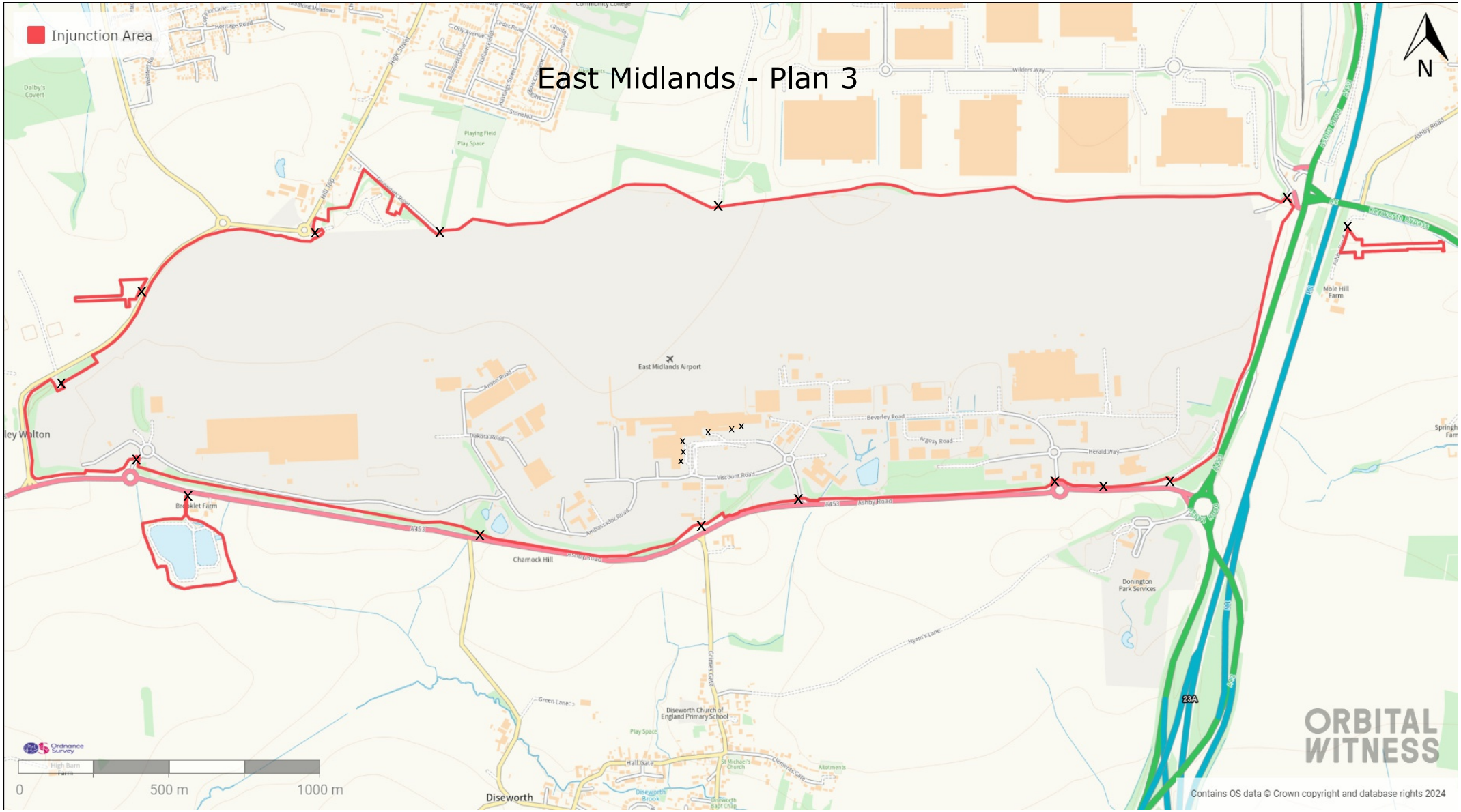
ORBITAL WITNESS
Manchester Airport
Warburton Green
Thorns Green
Styal
Morley
Hale Barns
Woodhouse Park
Moss Nook
Heald Green
Hilltop
Pownall Park

Stansted Airport - Plan 2




Injunction Area
East Midlands - Plan 3
N
East Midlands Airport
Charnock Hill
Diseworth
Diseworth Church of England Primary School
Donington Park Services
Mole Hill Farm
Brooklet Farm
Ashby Road
A453
Beverley Road
Herald Way
Viscount Road
Ambassador Road
Dakota Road
Anson Road
Hyam's Lane
Green Lane
Hall Gate
Wilders Way
Ashby Road
Playing Field
Play Space
Dalby's Covert
Ordnance Survey
0
500 m
1000 m
ORBITAL WITNESS
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CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
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(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

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.



EAST MIDLANDS INTERNATIONAL AIRPORT LIMITED

BYELAWS 2025

MAG East Midlands Airport

EAST MIDLANDS INTERNATIONAL AIRPORT LIMITED

BYELAWS 2025

East Midlands International Airport Limited in exercise of the powers conferred on it by sections 63 and 64 of the Airports Act 1986 hereby makes the following byelaws which shall apply within the Airport.

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1. DEFINITIONS:

1.1 In these byelaws the following words shall have the following meanings:

Air Traffic Control	means the service provided by air traffic controllers who direct Aircraft on the ground and through controlled airspace and can provide an advisory service of Aircraft in uncontrolled airspace;
Aircraft	means a heavier than air power-driven flying machine and includes aeroplane (land plane), aeroplane (sea plane), aeroplane (amphibian), aeroplane (self-launching motor glider), powered lift (tilt rotor) and rotorcraft (helicopter and gyroplane);
Airport	means the area of land constituting East Midlands Airport edged in red line on the plan attached at Schedule 1, including: all areas of the Airport accessible to the public, Airport users, third party suppliers and contractors and their personnel, all areas of the Airport accessible to Aircraft, including runways, taxiways, aprons and all grass areas;
Airport Company	means East Midlands International Airport Limited (registered in England and Wales under company number 02078271) and any successor to it as airport operator (as that term is defined in the Airports Act 1986), and where the context so requires references in these byelaws to the Airport Company shall include a reference to any person engaged (whether by employment or otherwise) by the Airport Company;
Airport Official	means in relation to any matter, a person authorised to act on behalf of the Airport Company;
Airport Security Pass	means a security pass issued by the Airport Company which grants the holder authorised access to certain identified areas of the Airport, subject to the terms and conditions which accompany the Airport Security Pass;
Airside	means the operational area inside the Airport security fence and beyond the Terminal Building security controls;
Animal	means any animal wild or domesticated that is brought onto the Airport except in byelaw 7.2 where it has the same meaning as in section 170(8) of the Road Traffic Act 1988;
Blue Light Vehicle	means ambulances, fire engines, police, doctors or other emergency vehicles using flashing blue, red or green lights and sirens or flashing headlights, or traffic officer and incident support vehicles using flashing amber lights;
Competence to Drive	means written authority issued to a person by their current employers which authorises that person to drive and operate a particular class of Vehicle;
Constable	means any person having the powers and privileges of a police constable, a traffic police community support officer or a police community support officer;
Customs and Excise Acts	has the same meaning as in the Customs and Excise Management Act 1979, Section 1;
Drunk	means after consuming so much alcohol that (i) the proportion of it in a person's breath, blood or urine exceeds the Prescribed Limit, and / or (ii) an Airport Official or Constable reasonably believes that the person is over the Prescribed Limit;

Ground handling	means the ground handling services listed in the Annex to Council Directive 96/67/EC (as amended, updated or replaced);
Lost Property Office	means any building or part of a building at the Airport which has been designated for that purpose from time to time by the Airport Company and includes all airport information desks located at the Airport;
Portable Entertainment Device	means any machine or any other portable device capable of transmitting audio sound;
Prescribed Limit	has the same meaning as in section 11 of the Road Traffic Act 1988;
Private Hire Vehicle	means a Vehicle, other than a Taxi or Public Service Vehicle, which is used for the purpose of carrying passengers for hire or reward and is authorised as such by a local council under s48 of the Local Government (Miscellaneous Provisions) Act 1976 as may be updated or replaced from time to time;
Public Service Vehicle	has the same meaning as in section 1 of the Public Passenger Vehicles Act 1981;
Restricted Area	means that part of the airport lying within the perimeter fence to which access is controlled by security check points and any other authorised entry point and including all stands, aprons, taxiways and the runway and includes any part of the Airport so designated by the Secretary of State under section 11A of the Aviation Security Act 1982 (as amended);
Road Traffic Enactments	has the same meaning as in section 63(3) of the Airports Act 1986;
Security Search Area	means any area on the Airport used by an Airport Official for security checks, passenger/staff screening or other security purposes;
Sign	means any object or device (whether fixed or portable) for conveying warnings, information, requirements, restrictions, instructions or prohibitions of any description;
Small Unmanned Vehicle	means any vehicle, whether airborne or land based, remotely controlled by a human operator or artificial intelligence (and which shall specifically include, but not be limited to, drones);
Taxi	means a hackney carriage licenced under s37 of the Town and Police Clauses Act 1847 as may be updated or replaced from time to time;
Terminal Building	means that building or buildings at the Airport used as terminals for passengers arriving at or departing from the Airport; and
Vehicle	means any mechanically propelled conveyance or manually operated apparatus on wheels and includes trailers, items of plant that operate as wheeled vehicles and as static apparatus but does not include an Aircraft or passenger baggage.

1.2 These byelaws may be cited as The East Midlands International Airport Byelaws 2025.

1.3 No provision in these byelaws shall apply to any member of a fire, police or ambulance service who is acting in the course of duty, or to any Vehicles being used by such a person.

2. PENALTIES:

2.1 These byelaws are without prejudice to the right of the Airport Company to impose an immediate ban on any person, group or body that may be in breach of these byelaws.

2.2 Any person contravening any provision of byelaws 3 to 8 hereof shall be liable on summary conviction to a fine which shall not exceed the relevant level on the standard scale[1] stated in relation to each byelaw as indicated in the right-hand column below adjacent to each byelaw. Where no fine is specified, the fine shall not exceed level 3 on the standard scale.

3. PROHIBITED ACTS:

The following acts are prohibited:

Number	Byelaw	Standard Scale Level
Security and safety of Aircraft		
3.1	***Aircraft Parking*** Except in the case of emergency, no person shall place an Aircraft other than in the place and position allocated from time to time for that Aircraft by or on behalf of the Airport Company.	3
3.2	***Securing Aircraft*** No person or corporation shall fail to secure against movement any stationary Aircraft which is not in a hangar.	4
3.3	***Failure to report Aircraft damage*** No person shall without reasonable excuse fail to report damage howsoever caused to an Aircraft or Aircraft equipment to a person having charge of it or its owner.	3
3.4	***Working in Airside areas*** No person shall whilst in Airside areas intentionally or recklessly drop or leave items which may cause or are capable of causing damage to Aircraft.	4
3.5	***Tampering with aircraft*** No person shall move or use or tamper with any Aircraft or anything used in connection with any Aircraft without lawful authority or reasonable cause or excuse.	4
Airport Equipment and systems		
3.6	***Tampering with equipment*** No person shall tamper with or misuse any mechanical, electrical or other apparatus used in connection with the operation of the Airport or the access of persons or Vehicles to any part of the Airport..	4
3.7	***Misuse of communications equipment***	4

[1] *As at the date of these byelaws the relevant levels on the standard scale are, by virtue of section 122 of the Sentencing Act 2020, as follows:*
Level 2 £500
Level 3 £1,000
Level 4 £2,500
These levels are, however, subject to amendment from time to time by regulations made under Part 4 of Schedule 23 to the Sentencing Act 2020.

	Unless authorised to do so, no person shall attempt to use, tamper with or misuse any communications equipment or other apparatus provided for transmitting and receiving messages or data at the Airport.	
3.8	***Radio Interference*** No person shall operate or use any radio transmitter or other thing capable of radiating or generating electrical interference in such a way as to adversely affect, or be likely to adversely affect, the operation of any communications, navigation or other systems at the Airport.	4
3.9	***Charging Devices*** No person shall charge laptops, tablets, phones or other such portable devices other than in the areas designated by the Airport for that purpose.	2
Safety, Fire and other precautions		
3.10	***Obstruction and interference*** No person shall intentionally or recklessly obstruct or interfere with the proper use of the Airport or with any person acting in the execution of their duty in relation to the operation of the Airport or pursuant to any applicable legislation, including the conveyance of passengers, their baggage and other goods, the security and safety of passengers, and the maintenance and servicing of Aircraft.	4
3.11	***False Alarms*** No person shall knowingly by any means give a false bomb warning or a false fire, ambulance, or other false emergency alarm.	4
3.12	***No Smoking*** No person shall smoke (including e-cigarettes and vape devices) or bring a naked light into or light any naked light when in any part of the Airport except when in those areas which are specifically designated by way of Sign for smoking.	3
3.13	***Emergency Exits*** No person shall obstruct or tamper with any of the emergency exits at the Airport.	4
3.14	***Evacuation*** Without reasonable excuse, no person shall in an emergency fail to evacuate any building on the Airport when instructed to do so by a Constable, an Airport Official or the Airport Company, or fail to evacuate upon hearing an alarm requiring persons to evacuate the Airport or any part of the Airport.	3
3.15	***Wearing of passes*** No person, other than a bona fide airline passenger, while in a Restricted Area shall fail to wear a pass issued to them by or on behalf of the Airport Company so that it is clearly visible at all times.	3
3.16	***Airport Security Passes*** No person shall: 3.16.1 misuse or fail to safeguard an Airport Security Pass; 3.16.2 fail to surrender an Airport Security Pass issued to that person when requested to do so by the Airport Company or an Airport Official; or 3.16.3 fail to report the loss of an Airport Security Pass to the Airport Company as soon as is practicable after the loss is first realised and in any event not more than 12 hours after the loss of the Airport Security Pass is first realised.	3

3.17	***Tampering with lift, etc*** No person shall tamper with or misuse any lift, escalator, travelator, tracked transit system, conveyor belt, air jetty, or any mechanical or electrical apparatus without lawful authority or reasonable cause or excuse.	3
Vehicles and vehicular traffic within the Airport		
3.18	***Production of insurance details etc*** Any person driving a Vehicle in a Restricted Area shall if requested to do so by a Constable or an Airport Official produce, either immediately or within seven days at a place specified by the Constable or Airport Official, details of the third-party insurance cover for the operation of the Vehicle in the Restricted Area, their airside driving permit and, if applicable, their Competence to Drive.	2
3.19	***Information as to driver of a vehicle*** Any person keeping a Vehicle in a Restricted Area or any other person shall give such information as to the identity of the driver of that Vehicle from time to time to a Constable or Airport Official such as it is in their knowledge to give and which may lead to the identification of the driver.	2
3.20	***Driving Airside*** No person shall drive or cause to be driven any Vehicle on the Restricted Area unless that person: 3.20.1 is in possession of a full current driving licence; and 3.20.2 is in possession of a valid apron driving permit (or as may otherwise be known or referred from time to time) as issued by the Airport Company; or 3.20.3 is driving a Blue Light Vehicle in the course of an emergency.	4
3.21	***Cargo baggage etc*** No person shall leave any cargo or baggage or park any Vehicle or equipment in contravention of any Sign or elsewhere than in a place provided by the Airport Company for the accommodation of such cargo or baggage or the parking of such Vehicle or equipment.	3
General		
3.22	***Unattended baggage*** No person shall leave any baggage or other item unattended in any part of the Airport.	2
3.23	***Use of emergency stop etc*** Except in the case of emergency, no person shall intentionally operate any switch or lever on any escalator, travelator, tracked transit system, lift or any other automatic conveyance for passengers or any fuel hydrant equipment upon or near to which a Sign is displayed which states that it is only intended to be operated in case of emergency.	4
3.24	***Allow anything on the Airport where forbidden*** A person shall not allow any Vehicle, Animal or thing to remain on the Airport (having been given a reasonable period to remove it), after its presence on the Airport has been forbidden by a Constable or Airport Official.	2
3.25	***Compliance with Signs or directions*** No person, whether on foot or whilst driving or propelling a Vehicle, shall neglect, fail or refuse to comply with an indication or direction given by a Constable or Airport Official or Sign exhibited by or on behalf of the Airport Company.	4

3.26	***Identification*** No person shall, upon request by a Constable or an Airport Official, fail to provide their correct name and address, the purpose of their being on the Airport and any identification which is necessary for the purpose of the request.	2
3.27	***Camp / Loitering*** No person shall camp on the Airport in a tent, trailer, caravan or otherwise, nor shall any person loiter, frequent or remain on the Airport without reasonable cause.	3
3.28	***Sleep*** No person shall sleep at the Airport for a period of time that is considered to be unreasonable by the Airport Company. For the avoidance of doubt, this Byelaw 3.28 does not seek to prohibit bona fide passengers falling asleep whilst waiting for their departure from the Airport a reasonable period in advance of that departure. Rather it is intended to prohibit passengers from staying overnight at the Airport prior to their departure and / or to prevent those who are not bona fide passengers from sleeping at the Airport.	2
3.29	***Misuse of baggage trolleys, wheelchairs, etc*** No person shall misuse any baggage trolley, wheelchair or any other transportation device provided for passenger use by the Airport Company, nor shall they remove such equipment from the Airport unless such equipment is specifically loaned to or otherwise provided to a person specifically for use by that person when outside of the Airport.	2
3.30	***Soilage*** No person shall wilfully urinate or defecate at the Airport other than in the toilets provided by the Airport Company or so as to outrage public decency or wilfully soil or defile any wall, structure, floor or pavement or any surface forming part of the Airport.	2
3.31	***Litter & pollution*** No person shall: 3.31.1 (a) leave uncovered refuse containers on any part of the Airport, or (b) drop, leave, throw or otherwise deposit anything where doing so would or might cause, contribute to, or (tend to) lead to damage to property (including Aircraft), or (c) commit defacement by litter, pollution or an improper or unauthorised disposal of waste substance on any part of a Restricted Area; or 3.31.2 drop, leave or throw food items on any part of the Airport which may attract birds; or 3.31.3 drop or leave litter or refuse on the Airport except in a receptacle provided for the purpose; or 3.31.4 fly tip on any part of the Airport.	3
3.32	***Spitting and chewing gum disposal*** No person shall spit on the floor, side or wall, any Vehicle, passenger transit system, or in any building, or on any pavement within the Airport, and any chewing gum must be disposed of in a responsible manner.	2
3.33	***Drunk, etc*** No person shall: 3.33.1 be Drunk or under the influence of drugs or other intoxicating substances in any part of the Airport; or	3

	3.33.2 remain on the Airport whilst intoxicated or under the influence of drugs or other intoxicating substances; or 3.33.3 consume alcohol in any part of the Airport other than (a) in outlets specifically designated to sell or supply alcohol for consumption on the premises, or (b) inside an Aircraft where consumption of alcohol by passengers is permitted; or 3.33.4 sell alcohol other than in outlets specifically designated to sell or supply alcohol or sell any other intoxicating substances anywhere at the Airport.	
3.34	***No unauthorised demonstrations, etc:*** No person shall organise or take part in any demonstration, procession or public assembly which has not been pre-notified to and pre-approved by the Airport Company and /or that in the opinion of a Constable or Airport Official could or could continue to obstruct or interfere with the proper use of the Airport or the safe or efficient use of the Airport by any person or organisation or which could or could continue to obstruct or interfere with the comfort, convenience and / or safety of passengers or persons using the Airport.	3
3.35	***No unauthorised flags or banners, etc:*** No person shall display any flags, banners or emblems which in the opinion of a Constable or Airport Official may cause or continue to cause offence or a breach of the peace on any part of the Airport, or which are likely to cause offence or a breach of the peace on any part of the Airport.	2
3.36	***Access to Airport*** No person shall enter the Airport except for a bona fide purpose and no person shall remain at the Airport once that purpose has been discharged.	4
3.37	***Persons required to leave*** No person shall remain on the Airport after being requested by a Constable or an Airport Official to leave. No Constable or Airport Official shall request a person to leave unless (a) that person has caused or is, in the reasonable opinion of the requesting Constable or Airport Official, about to cause a disturbance (including using language or making gestures which are lewd, foul or offensive), or (b) has committed or is, in the reasonable opinion of the requesting Constable or Airport Official, about to commit an offence (including a breach of these Airport Byelaws); or (c) after, having entered the Airport for a bona fide purpose, have completed their bona fide purpose for entering the Airport. Nothing in this paragraph shall prejudice the operation of other byelaws pertaining to the removal or evacuation of persons from the Airport.	4
3.38	***Person not to return for 24 hours*** No person having left the Airport at the request of a Constable or Airport Official shall re-enter the Airport for a period of twenty-four hours thereafter, unless such re-entry is authorised in writing by the Constable or Airport Official issuing the original request to leave (or in their absence the Airport Company).	3
3.39	***Prohibited Persons***	4

	No person shall enter the Airport whilst having been temporarily or permanently prohibited from doing so by the Airport Company. A person who has either: (a) in the opinion of the Airport Company acted in breach of these byelaws, or committed any other offence on Airport premises or involving the Airport's activities or operations; or (b) been issued with a caution by the police in respect of such an offence; may be excluded from the Airport permanently or for a set period of time, such exclusion to be determined by the Airport Company at its discretion and set out in writing by the Airport Company to the person.	
3.40	***Persons to keep Animals under control*** No person shall fail to keep any Animal under control or permit any Animal to foul any footpath or building, provided that in proceedings for an offence against this byelaw it shall be a defence for the person charged to prove that they took all reasonable precautions and exercised all due diligence to avoid the commission of the offence.	3
3.41	***Vehicle, Animal or thing not to return*** No person shall allow any Vehicle, Animal or thing to be on the Airport after having been required by a Constable or an Airport Official to remove it and no person after having complied with this requirement shall allow that Vehicle, Animal or thing to re-enter the Airport within a period of 7 days unless such re-entry has been approved in writing by a Constable or Airport Official.	3
3.42	***Grazing of Animals*** No persons shall graze Animals at the Airport	2
3.43	***Skateboards, roller skate, e-scooters etc*** No person shall use skateboards, roller skates, quad bikes, bicycles, scooters (including e-scooters) or similar modes of propelled transport anywhere on the Airport expect of the use of mobility scooters or wheelchairs designed for use by disabled persons. Without prejudice to the foregoing, no person shall take an e-scooter into the Terminal building whatsoever due to the fire risk it poses.	3
3.44	***Search*** Whilst anywhere on the Airport any person (whether a bona fide airline passenger or not) shall, when requested by a Constable or Airport Official to do so, submit to a personal search, or to a search of their baggage or Vehicle or any other item under their control. Any person (whether a bona fide airline passenger or not) who refuses to be searched or to have their baggage or Vehicle searched by a Constable or Airport Official must immediately leave the Airport if requested to leave by such Constable or Airport Official.	4
3.45	***Use of mobile phone*** No person shall: (i) when Airside use a mobile phone whilst operating a moving Vehicle; (ii) use a mobile phone when in Airside fuelling areas at any time; (iii) use a mobile phone at the Airport at any time after an Airport Official or Constable has requested them not to do so for operational reasons or in times of emergency, and if so requested fail to ensure the mobile phone is switched off.	3

4. ACTS FOR WHICH PERMISSION IS REQUIRED:

No person shall perform any of the following acts, unless the permission of the Airport Company has first been obtained or unless the act is performed by a person acting with lawful authority.

Number	Byelaw	Standard Scale Level
Security and safety of Aircraft		
4.1	***Aircraft engine running*** No person shall: 4.1.1 run an Aircraft engine in a hangar or in an area other than that allocated from time to time for that purpose by the Airport Company; 4.1.2 run an Aircraft engine above its idling speed (for start up) for test purposes except in an engine test bay or in such other area allocated from time to time for that purpose by the Airport Company; or 4.1.3 run an Aircraft engine above its idling speed (for start up) for test purposes inside an engine test bay or in such other area allocated from time to time for that purpose by the Airport Company outside the hours specified by the Airport Company from time to time for that purpose.	2
4.2	***Entering Aircraft*** No person except an Airport Official or Constable shall enter or climb upon an Aircraft without the written consent of the Aircraft owner or the Airport Company.	4
4.3	***Cleaning etc of aircraft and vehicles*** No person shall clean, service or maintain Aircraft, Vehicles or equipment in areas where such activities are prohibited by any Sign or written notice issued by the Airport Company.	2
4.4	***Moving of Aircraft*** No person shall move, or cause to be moved, over the roads or movement areas of the Airport any Aircraft by means of its engines without the consent of the Airport Company.	3
4.5	***Airport Equipment*** No person shall operate, use, move or disturb any Airport equipment except with the written consent of, or at the instruction of, the Airport Company.	3
Safety, fire and other precautions		
4.6	***Fire & Fireworks*** No person shall, by any act or omission, cause or permit a fire to occur or set off fireworks except in a place specifically constructed for that purpose.	3
4.7	***Use of fuel*** No person shall fill or discharge from any container, including any part of any Vehicle, liquid fuel elsewhere than in a place approved for that purpose by an Airport Official.	2
General		
4.8	***Ground handling*** No person shall carry out Ground handling at the Airport without written consent from the Airport Company.	3
4.9	***Discharging deleterious matter***	4

	No person shall cause or permit the discharge of hydrocarbon (whether in the form of grease, oil, fuel, spirit or similar) or other deleterious matter (whether of a solid, liquid or gaseous nature) or any other substance of whatever nature which might obstruct or be or become a source of damage to drains, sewers or other areas or infrastructure (whether Airport infrastructure or otherwise) and which shall or may constitute a risk to the environment or public health or the health or wellbeing of any Animal.	
4.10	***Prohibition Notice*** No person shall fail to comply with any Sign prohibiting or restricting access to any building, road, or any part of the Airport.	3
4.11	***Climbing etc*** No person shall climb any wall, fence, barrier, railing or post.	3
4.12	***Cutting or destroying etc*** No person shall cut, damage, or destroy any wall, fence, barrier, railing or post located on or within the Airport.	3
4.13	***Not to cause annoyance*** No person shall sing, dance, shout, play a musical instrument, operate a Portable Entertainment Device, use a laser pen or otherwise behave in such a way as to give reasonable cause for annoyance to any other person and no person shall fail to cease such activities when reasonably requested by an Airport Official or Constable.	2
4.14	***Apparatus*** No person shall erect or use any apparatus for transmission, receipt, recording, reproduction or amplification of sound, speech or images for: 4.14.1 commercial purposes; or 4.14.2 for any purpose in a Security Search Area or at Border Force controls.	3
4.15	***Restricted Area Fence*** No person shall place any building structure, equipment, Vehicle or container or any other item within three metres of any fence forming the boundary of a Restricted Area.	3
4.16	***Restricted Access*** No person shall: 4.16.1 enter any part of the Airport to which members of the public are not for the time being admitted; 4.16.2 drive a Vehicle Airside elsewhere than in a place provided for the passage or accommodation of such a Vehicle; 4.16.3 except in an emergency, enter or remain on any part of the Airport Company's premises which is marked by a Sign exhibited in a conspicuous position on or near such part of the premises as being not available for entry or for use; or 4.16.4 with or without a Vehicle enter that part of the Airport known as the aircraft manoeuvring area without first obtaining the permission and clearance of Air Traffic Control.	3
4.17	***Entering or leaving the Airport*** No person shall enter or leave the Airport otherwise than through a gate or entrance or exit for the time being provided by the Airport Company for that purpose.	3
4.18	***Offer of service***	3

	No person shall sell or distribute anything, offer anything for sale or hire or make any offer of services for reward.	
4.19	***Display signs / signage:*** No person shall post, distribute or display any notice, advertisement, sign, circular or other written or printed matter, except on premises which the person posting, distributing or displaying it, is authorised to occupy, and in accordance with the terms of their occupation thereof.	3
4.20	***Begging*** No person shall beg or solicit funds or contributions of any kind.	3
4.21	***Gaming*** No person shall engage or agree to engage, in bookmaking, gaming, betting or wagering nor pay, receive, or settle bets with any other person.	3
4.22	***Operation of Small Unmanned Vehicle*** No Small Unmanned Vehicle shall be operated (which includes being switched-on) on or at the Airport, nor shall any Small Unmanned Vehicle be operated (which includes being switched-on) in contravention of any relevant legislation or statutory instrument (including, for the avoidance of doubt, insofar as such legislation or statutory instrument pertains to the proximity to the Airport of any operation of a Small Unmanned Vehicle).	4
4.23	***Market Research*** No person shall conduct or otherwise engage in any market research, survey or product testing survey or conduct any interview with passengers or employees of the Airport Company.	3
4.24	***Graffiti*** No person shall create graffiti upon any wall, structure, floor or pavement or any surface forming part of or used in relation to the Airport.	3
4.25	***Photography, Filming etc*** No person shall take photographs or participate or engage in filming, video recording, sound recording or recording in any other form or medium including (but not limited to) electronic media in or upon the Airport, the Terminal Buildings or any part thereof except as a bona fide passenger.	3

5. PROHIBITED ACTS ON PARTS OF THE AIRPORT TO WHICH THE ROAD TRAFFIC ENACTMENTS DO NOT APPLY:

The following acts are prohibited on any part of the Airport to which the Road Traffic Enactments do not apply:

Number	Byelaw	Standard Scale Level
5.1	***Driving Offences*** No person shall drive a Vehicle: 5.1.1 dangerously and for the purposes of this byelaw driving dangerously shall have the meaning given to it in section 2A of the Road Traffic Act 1988;	4

	5.1.2 without due care and attention, or without reasonable consideration for other persons using that part of the Airport; 5.1.3 whilst Drunk or under the influence of alcohol and/or drugs and/or any other intoxicating substance or substances; 5.1.4 whilst operating a mobile telephone or other handheld device save where required to do so while acting in the course of their duties as a person employed at the Airport; or 5.1.5 without prejudice to any notice from the Airport Company of the Airport from time to time, at a speed in excess of 20 miles an hour on the Airport's apron or roads or in excess of such other speed limit indicated by a Sign erected in a conspicuous or appropriate position or by a Sign which conforms to the Traffic Signs Regulations and General Directions 2016, which speed shall not in any event be more than 40 miles per hour except a Blue Light Vehicle responding to an emergency.	
5.2	***Not to cause danger with a Vehicle*** No person shall use, cause, or permit to be used any Vehicle in such a way as to cause or to be likely to cause danger or nuisance to any person.	4
5.3	***Failure to set handbrake*** No person shall cause or permit any Vehicle to be left unattended unless any parking brake or restraining device with which the Vehicle is equipped is properly engaged.	3
5.4	***Use of Vehicles*** No person shall use, cause or permit to be used any Vehicle which fails to comply with any braking, steering, lighting, tyre or electrical requirements which would apply to that Vehicle if it were to be operated on a road to which the road traffic enactments apply, and no person shall use, cause or permit to be used any Vehicle where the safety locking devices are not in good working order.	3
5.5	***Fuel and exhaust systems*** No person shall use, cause or permit to be used any Vehicle unless the condition of the fuel and exhaust systems is at all times such that no danger or nuisance is caused or is likely to be caused to any person or property.	2
5.6	***Passenger safety and unsecure load*** No person shall use, cause or permit to be used: 5.6.1 any Vehicle unless the Vehicle and all parts and/or accessories and/or load of the Vehicle are at all times in such condition and of such weight, distribution, packing and/or adjustment that no danger is caused or is likely to be caused to any person or property in or on the Airport; or 5.6.2 any Vehicle unless the number of passengers carried by the Vehicle and the manner in which passengers are carried in or on the Vehicle is such that no danger is caused or is likely to be caused to any person or property in or on the Airport; 5.6.3 any Vehicle unless the seatbelts provided are worn by all passengers being conveyed in the Vehicle; or 5.6.4 any Vehicle unless the load carried by such Vehicle is at all times so secured, if necessary by physical restraint other than its own weight, and is in such a position that neither danger nor nuisance is caused or is likely to be caused to any person or property by reason of the load or any part thereof falling or being blown from such Vehicle, or by reason of any other movement of the load or any part thereof.	2

5.7	***Permitted areas for Vehicles*** Except in an emergency no person shall cause or permit Vehicles, Aircraft servicing equipment or persons to enter those parts of the Airport licensed for the surface movement of Aircraft including the manoeuvring area, aprons and any part of the Airport provided for the maintenance of Aircraft except these parts specifically allocated from time to time by the Airport Company for use by Vehicles, Aircraft servicing equipment or persons.	2
5.8	***Use of Vehicles on Apron*** No person shall use, cause or permit to be used on the Apron any Vehicle (except in the case of an emergency) unless: 5.8.1 The Vehicle displays valid means of identification on both nearside and offside including the name of the company owning or operating the Vehicle, a Vehicle number allocated by the Airport Company and the Airside Vehicle Permit; and 5.8.2 During the hours of darkness and in poor visibility the front and rear lights of the Vehicles are switched on.	3
5.9	***Charging points*** No person shall charge a Vehicle unless through a charging point provided for that purpose and no person shall use such a charging point otherwise than in accordance with its instructions for use.	2
5.10	***Drive or place a Vehicle*** No person shall drive, operate or place a Vehicle elsewhere than in a place provided for the passage or accommodation of such a Vehicle.	3
5.11	***Lights on Vehicle*** No person shall drive or leave any Vehicle which does not comply with any of the lighting requirements which apply on those parts of the Airport to which the Road Traffic Enactments apply.	3
5.12	***Unattended Vehicles*** No person shall leave any Vehicle: 5.12.1 unattended when its engine is running; 5.12.2 with a removable ignition key unattended when the ignition key is in the Vehicle; or 5.12.3 abandoned at the Airport.	3
5.13	***Failure to stop*** No person shall, when the driver of a Vehicle, fail to stop when required to do so by Sign or a Constable or an Airport Official.	4
5.14	***Failure to comply with a direction*** No person shall, when the driver of a Vehicle, fail to comply with any direction or the regulation of traffic by a Constable, Airport Official or Sign.	4
5.15	***Failure to move Vehicle*** No person shall, when in charge of a Vehicle, fail to remove it from any parking place when required to do so by a Constable or an Airport Official.	4
5.16	***Obstruction causing Danger*** Except in an emergency, no person in charge of a Vehicle shall cause or permit the Vehicle to stand, loiter, dwell or move so slowly as to cause	3

	any obstruction, or so as to be likely to cause danger to Aircraft, any person or persons and/or property	

5.17 Vehicle Towing on parts of the Airport to which Road Traffic Enactments do not apply

5.17.1 The Airport shall be entitled to claim from the owner of a Vehicle and the owner of a Vehicle shall be liable to pay the reasonable costs incurred by the Airport Company (or other persons acting on its behalf) in removing and storing a Vehicle from any area of the Airport where a Sign is displayed advising:

5.17.1.1 That any Vehicle parked contrary to such a Sign or these byelaws may be removed and stored by the Airport Company; and

5.17.1.2 That the reasonable costs incurred by the Airport Company (or other person on its behalf) for this may be recovered from the Vehicle's owner.

5.17.2 Having removed and stored the Vehicle pursuant to byelaw 5.17.1 hereof, the Airport Company shall only be required to release the Vehicle to the owner or another person on the owner's behalf once the reasonable costs owed to the Airport Company have been paid in full.

5.17.3 Any challenge to the reasonableness of the Airport Company's charges for removal and storage of a Vehicle pursuant to byelaw 5.17.1 hereof must be made in writing to the Airport Company within 7 days of the charges being paid.

6. TAXIS AND PRIVATE HIRE VEHICLES:

Number	Byelaw	Standard Scale Level
6.1	***Supply or hire*** No person shall in the Terminal building or other public building, car parks or other public place on the Airport offer their or any other Vehicle for hire or perform any services in relation to the supply or hire of a Vehicle without the permission of an Airport Official.	2
6.2	***Private Hire Vehicles*** No person shall cause or permit a Private Hire Vehicle to enter the Airport for the purpose of loading passengers unless that Private Hire Vehicle has been pre-booked or is to be parked in a designated car park or areas (as so designated by the Airport Company from time to time) in anticipation of such a booking.	2
6.3	***Loading of Private Hire Vehicles*** No person shall cause or permit a Private Hire Vehicle to load passengers at the Airport other than in a car park or such space as may be designated by the Airport Company from time to time.	2
6.4	***Ply for hire*** No person shall cause or permit a Private Hire Vehicle to ply for hire.	2

	No person shall cause or permit a Taxi to ply for hire or load passengers unless: 6.4.1 authorised to do so by the Airport Company in writing; and 6.4.2 they do so from a standing authorised by the Airport Company provided that it shall not be an offence to load passengers with the consent of a Constable, traffic warden in uniform or an Airport Official.	
6.5	***Obstruction*** Taxi drivers and Private Hire Vehicles shall not obstruct any roads, footpaths or buildings at the Airport or cause annoyance or disturbance to persons within the Airport or obstruct or interfere with the proper use of the Airport or with any person acting in the execution of their duty in relation to the operation of the Airport.	2
6.6	***Engine Off*** Taxi drivers and Private Hire Vehicles shall switch the engine off, save when in the process of driving.	2
6.7	***Sounding of Horn*** No Taxi driver nor Private Hire Vehicle shall sound a horn for any reason other than in an emergency.	2

7. ACCIDENT REPORTING:

Number	Byelaw	Standard Scale Level
7.1	***Aircraft Accident Reporting*** Where, on a part of the Airport to which the road traffic enactments do not apply, any accident involving an Aircraft occurs: 7.1.1 if present at the time of the accident, the aircraft commander (or, if the Aircraft is being towed, the tug-driver) shall stop and give: 7.1.1.1 their name and address; 7.1.1.2 the name and address of the person who is the operator of the Aircraft at the time of the accident; 7.1.1.3 the identification marks of the Aircraft; and 7.1.1.4 details of the accident to an Airport Official or a Constable through the published Airport emergency telephone number, or through the Airport's published emergency number, or to an Airport Official or Constable where otherwise requested to provide such information as soon as reasonably practicable but in any event no later than 24 hours after the accident; 7.1.2 the driver of any Vehicle involved shall stop and give: 7.1.2.1 their name and address; 7.1.2.2 the name and address of the owner of the Vehicle; 7.1.2.3 the registration number or identification marks of the Vehicle; and 7.1.2.4 details of the accident	3

	to an Airport Official or a Constable through the published Airport emergency telephone number, or through the Airport's published emergency number, or to an Airport Official or Constable where otherwise requested to provide such information as soon as reasonably practicable but in any event no later than 24 hours after the accident.	
7.2	***Vehicle Accident reporting*** Where, on a part of the Airport to which the Road Traffic Enactments do not apply, any accident involving a Vehicle occurs by which: 7.2.1 personal injury is caused to a person other than the driver of that Vehicle; or damage is caused: 7.2.1.1 to a Vehicle other than that Vehicle; 7.2.1.2 to an Animal other than an Animal in or on that Vehicle; or 7.2.1.3 to any other property construed on, fixed to, growing in or otherwise forming part of the land on which the road in question is situated or land adjacent to such land; no driver shall fail to stop and give his/her name and address, the name and address of the owner of the Vehicle, the registration number or identification marks of the Vehicle and details of the accident to an Airport Official or Constable through the published Airport emergency telephone number or to an Airport Official or Constable where otherwise requested to provide such information, as soon as reasonably practicable but in any event no later than 24 hours after the accident.	3

8. LOST PROPERTY:

8.1 Applications of byelaws to lost property

8.1.1 These byelaws shall apply in relation to the safe custody, re-delivery or disposal of any property or thing which is found having been lost on any part of the Airport to which the public or passengers have access or in any Vehicle owned or operated by or on behalf of the Airport Company but excluding any property or thing found on board an Aircraft, in a Taxi or on premises let by the Airport Company.

8.2 Handing in of lost property by public

8.2.1 Subject to the provisions of the Customs and Excise Acts, any person (other than a member of staff of the Airport or an Airport Official or a Constable) who finds property which they believe to be lost or abandoned shall as soon as reasonably practicable notify a member of Airport staff, an Airport Official or a Constable and inform that person of the place and circumstances in which it was found.

8.3 Handing in of lost property by Airport personnel

8.3.1 Subject to any provisions of the Customs and Excise Acts and byelaw 8.3.2 below, any member of Airport staff or an Airport Official or Constable to whom found property is notified pursuant to byelaw 8.2 hereof or who themself finds any property to which these byelaws apply shall, as soon as reasonably practicable and in any case before

leaving the Airport (but subject always to any applicable security check requirements), deliver such property for safe custody in the state in which it comes into their possession to the Lost Property Office, and in exchange for a receipt for the deposit of that property with the Lost Property Office, and shall inform a member of staff of the Airport or an Airport Official at the Lost Property Office of the circumstances in which it was found.

8.3.2 If before any lost property shall have been delivered for safe custody to the Lost Property Office under this byelaw, it is claimed by a person who satisfies the member of Airport staff or Airport Official or Constable, as the case may be, that he/she is the true owner, it shall be returned to that person, forthwith, without fee, on giving his/her name and address to the member of Airport staff or Airport Official or Constable who shall, as soon as possible, report the facts and given the claimant's name and address and a description of the lost property to the Lost Property Office.

8.4 Retention of lost property

8.4.1 Any property delivered to the Lost Property Office shall be retained in safe custody by the Airport Company or an Airport Official until claimed by the true owner thereof or disposed of in accordance with these byelaws;

8.4.2 The Airport Company or an Airport Official shall keep for a period of not less than 12 months a record showing particulars of the lost property (whether delivered to the Lost Property Office or disposed of pursuant to byelaw 8.6 hereof), the circumstances in which it was found and the ultimate disposal of the lost property provided that official documents, including licences, passports and identity books shall wherever practicable be returned forthwith to the appropriate government department, local authority or other body or person responsible for issuing them or for controlling or dealing with them; and

8.4.3 Where the name and address of the true owner of any lost property (other than the documents referred to in the preceding proviso) are readily ascertainable the Airport Company or an Airport Official shall forthwith notify him/her that the lost property is in their possession and may be claimed in accordance with these byelaws.

8.5 Claiming lost property

8.5.1 If any lost property, while it is retained by the Airport Company in safe custody, is claimed and the claimant proves to the satisfaction of the Airport Company or an Airport Official that he/she is the true owner and gives his/her name and address to a member of staff of the Lost Property Office or an Airport Official, it shall thereupon be delivered to the claimant at the Lost Property Office upon payment of such charges as the Airport Company may from time to time fix for the return of any lost property delivered to the Lost Property Office.

8.6 Disposal of property

8.6.1 If any lost property retained by the Airport Company or an Airport Official for safe custody in accordance with these byelaws is not, within three months of the date when it was delivered to the Lost Property Office, re-delivered to a person pursuant to byelaw 8.4.3 hereof, the Airport Company or an Airport Official shall be entitled to

dispose of it (including but not limited to selling it) in its absolute discretion as it sees fit.

8.6.2 Notwithstanding the foregoing provisions of these byelaws, if any lost property retained by the Airport Company or an Airport Official pursuant to these byelaws is of a perishable nature and if, within 48 hours from the time when it was found, it has not been re-delivered to a person pursuant to byelaw 8.4.3 hereof, the Airport Company or an Airport Official shall be entitled to either sell it at the best price that can reasonably be obtained or otherwise dispose of the lost property if it shall have no obvious value as assessed by the Airport Company or an Airport Official and as such is probably incapable of being sold.

8.6.4 Notwithstanding the foregoing provisions of these byelaws, if any lost property retained by the Airport Company or an Airport Official pursuant to these byelaws is of obviously negligible value (under £25.00) and if, within fourteen days from the time when it was found, it has not been re-delivered to a person pursuant to byelaw 8.5 hereof, the Airport Company or an Airport Official shall be entitled to either (1) sell it at the best price that can reasonably be obtained or (2) dispose of the lost property by donation to a charity or by destroying the lost property and disposing of it completely.

8.6.5 Notwithstanding the foregoing provision of these byelaws any lost property which is or which becomes objectionable may forthwith be destroyed or otherwise disposed of in a reasonable manner.

8.6.6 A sale under this byelaw shall not prejudice the right, for a period of 12 months from the date on which the property came into the custody of the Airport Company or an Airport Official, of any true owner whose rights have been divested by the sale to be paid the proportion due to him/her of the residue of the proceeds of sale after deduction of any charge by the Airport Company or an Airport Official for the safe custody and sale of the lost property and the Airport Company or an Airport Official's reasonable costs.

8.7 Opening of package, bag or receptable

8.7.1 Where any lost property is contained in a package, bag or other receptacle, a Constable or an Airport Official may cause such receptacle to be opened and the contents examined, or require the claimant to open it and submit it and its contents for examination, for the purpose of:

8.7.1.1 identifying and tracing the owner of the lost property;

8.7.1.2 ascertaining the nature of the contents; or

8.7.1.3 satisfying the Airport Company or an Airport Official that the contents do not include any item or items which may put at risk the safety or security of any person, the Airport, any Aircraft or any air navigation installation.

8.7.2 If any item or items referred to in 8.7.1.3 above are found, they shall be reported to a Constable or Airport Official immediately.

9. AUTHORITY:

No Airport Official shall exercise any power under any of these byelaws without producing written evidence of their authority if required to do so.

10. REVOCATION OF BYELAWS:

Any previous byelaws relating to the Airport are hereby revoked with effect from the date hereof and replaced solely by the byelaws set out above.

Executed by EAST MIDLANDS INTERNATIONAL AIRPORT LIMITED
acting by Steven Griffiths, a Director,
in the presence of:

.....
Director

Name of Witness Lauren Turner

Signature of Witness .....

Occupation of Witness Accountable Manager

The foregoing byelaws are hereby confirmed by the Secretary of State for Transport and shall come into operation on ...31st July..... 2025

Signed by

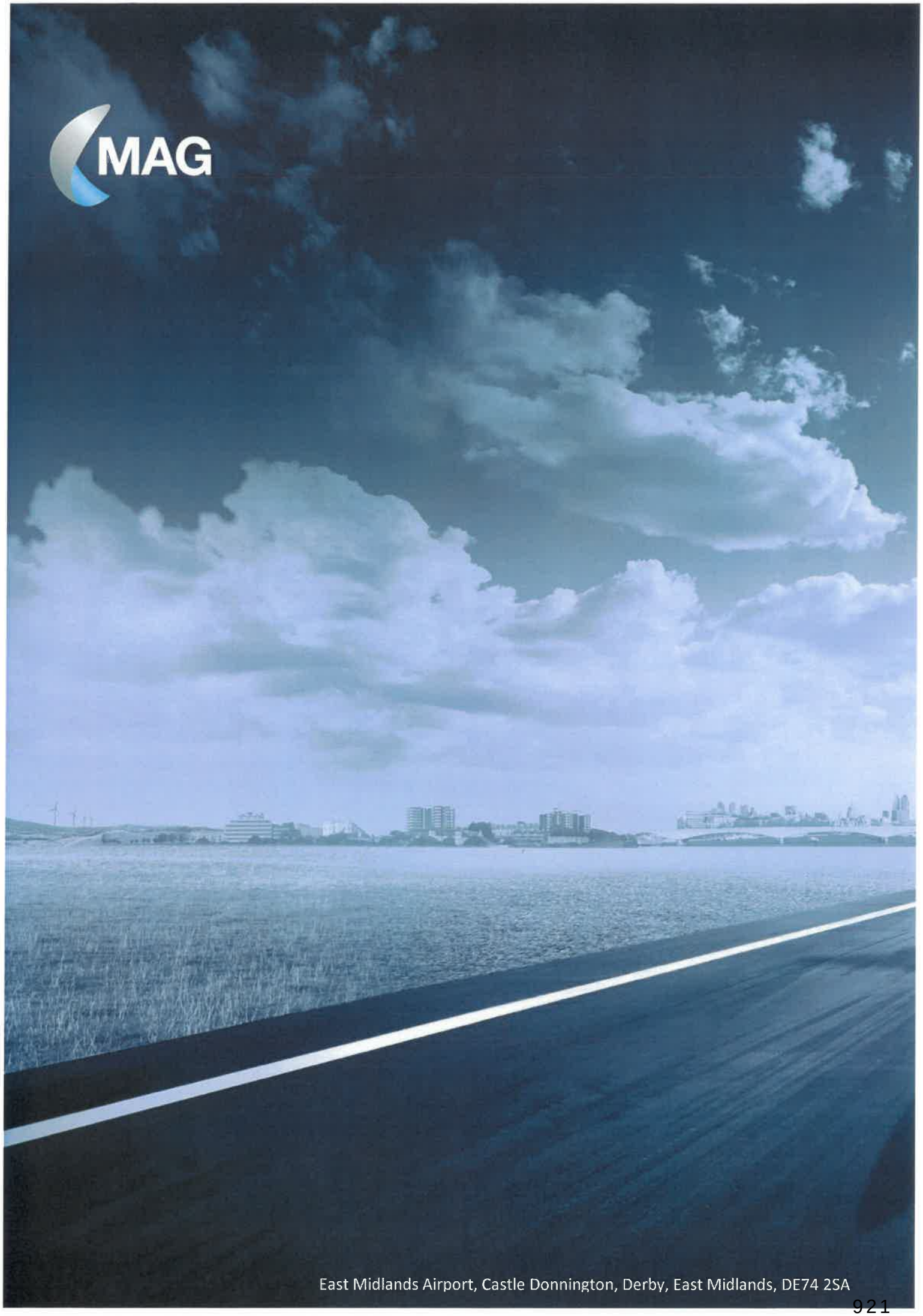
.....

Deputy Director, Airspace, Resilience and Connectivity Division by Authority of the Secretary of State

SCHEDULE 1

Red line area of East Midlands Airport with the byelaws applying to any area within the red line.





East Midlands Airport, Castle Donnington, Derby, East Midlands, DE74 2SA

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

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)		

■

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KING'S BENCH DIVISION

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(3) MANCHESTER AIRPORT CAR PARK (1) LTD
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(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

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

Date of Event/press	Location	Brief details of event etc.	Link to source of informations
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.whtimes.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/dGFnOnJldXRlcnMuY29tLDIwMjY6bmV3c21sX01UMVNJUEEwMDBPRjlXU1k
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."



Extinction Rebellion outside Aviva, Pear Street, Sheffield.

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 it's 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.

Over the past 12 months, IOS has coordinated more than 150 actions, targeting 27 insurance firms in over 40 towns and cities. Now, the momentum is accelerating. From 2–14 July, a UK-wide Wave of Action will ramp up pressure on the insurers enabling climate destruction. Across the country, activists will expose the "dirty insurers" underwriting and brokering some of the world's most devastating fossil fuel projects—including the East African Crude Oil Pipeline (EACOP), Mozambique LNG, Arctic LNG 2, and Papua LNG.

Fossil fuel companies cannot operate without insurance. That makes insurers the hidden enablers of climate breakdown—profiting from disaster while claiming neutrality. But they're no longer in the shadows. They are a critical weak link in the fossil fuel chain—and campaigners are stepping up to break it.

GLOBAL PROJECTS, LOCAL CONSEQUENCES

EACOP is already displacing thousands in Uganda and Tanzania, violating human rights, threatening food and water supplies, and endangering protected ecosystems. LNG projects in Papua New Guinea, Mozambique, and the Russian Arctic are linked to militarisation, the destruction of Indigenous lands, and irreversible ecological damage [1, 2, 3, 4]. These are just a few of the 400+ carbon bombs currently in development [5].

But the impacts aren't confined to distant places.

"By backing these fossil fuel projects, insurers are not only fuelling climate breakdown and human rights abuses—they're also making life harder here in the UK," said Lucy Porter, a spokesperson for Insure Our Survival.

"When extreme weather floods our homes, when food prices surge, and when small businesses can no longer afford insurance, we must ask: who is enabling this chaos? Insurers who continue to underwrite new oil, gas, and coal projects are complicit—not just in destruction abroad, but in rising suffering at home."

LOCAL ACTION, GLOBAL RESISTANCE

Throughout the Wave of Action, communities across the UK will organise creative and disruptive protests outside the offices of targeted insurers and brokers. From city centres to rural high streets, IOS is calling on people to make visible the connection between fossil fuel insurance and the cost of climate chaos.



“Insurance giants like Lloyd’s, Liberty Mutual, AIG, Tokio Marine, Brit, Chaucer, and brokers like Marsh have the power to stop destructive fossil fuel projects like EACOP—but instead, they choose to back industries driving climate collapse, human rights abuses, hunger, war, and displacement.

Right now, 11 climate activists in Uganda have been brutally detained for speaking out against EACOP’s new funders. While insurers protect the profits of the richest 1%, communities around the world are paying the price—facing deadly heatwaves, floods, droughts, and devastation.

How long must we raise the alarm before they act? It’s time they chose people over profit, justice over destruction, and life over collapse. We can’t escape to Mars. This is our only home—and we will not stop fighting for it.”
— *Nicholas Omonuk, End Fossil Occupy Uganda*

WHAT’S NEXT: A GLOBAL ESCALATION

Following the UK Wave of Action, IOS will launch its international phase—escalating and expanding efforts worldwide. The campaign will work with global activists to confront dirty insurers and brokers in every region, turning scattered actions into a united front against the industry’s role in climate injustice.

“We don’t have 20 years to stop these projects. We barely have time to avoid irreversible collapse,” said Porter. “That’s why we’re escalating now—together, across borders, communities, and every dirty insurer’s threshold.”

📣 TAKE ACTION

- **Join the IOS Telegram** for updates, action support, and resources: https://t.me/+wV2EEWPpMJtlMzQ0
- **Visit the IOS website** and sign up to get involved: InsureOurSurvival.org
- **Socials**
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London Oxford Airport: Extinction Rebellion to hold protest

Oxford Airport

Environmentalists at Extinction Rebellion will be protesting at London Oxford Airport near Kidlington against private jets.

The group claim it is the “most energy-intense form of flying” at the airport formerly known as Kidlington Airport, claiming each jet will emit “substantially more carbon per passenger than commercial flights”.

Taking place on Saturday, July 5, protesters will assemble at 10am for a march from the west end of Kidlington High Street to the entrance of the airport.

They say the demonstration will be peaceful.

It comes after protesters from Palestine Action were widely condemned by national politicians after breaking into RAF Brize Norton overnight on Thursday, June 19 and sprayed red paint into the engines of two Airbus Voyager aircrafts and onto the runway.

This prompted Prime Minister Sir Keir Starmer to condemn the actions of the protesters as "disgraceful".

He added: "Our Armed Forces represent the very best of Britain and put their lives on the line for us every day. It is our responsibility to support those who defend us."

Now another stunt is planned in the county by the Extinction Rebellion group.

A file image of Extinction Rebellion protesters. Image: PA Freya Chambers, an activist with Extinction Rebellion Oxford, said: “As global temperatures continue to rise, now is the time to drastically cut emissions – starting with luxury private flights.

“Instead, the UK is now being hailed as the private jet capital of Europe.

“Oxford Airport is a hub for private flights by the wealthy elite, while the local community pays the price in pollution and an accelerating climate crisis.”

She added: “According to Civil Aviation Authority data, 13,774 private flights went to or from Oxford Airport in 2024.

“This is an average of 38 private jets every single day. At least 28 per cent of those were empty of passengers.

“These private jets are used like taxis by the super-rich to make short, one-way journeys within the UK and Europe.

“Globally, almost half of all private flights in 2023 were shorter than 500 km - that’s about the same as London to Edinburgh - and Oxford follows this trend.”

A general view of London Oxford Airport. Picture: Richard Cave She said the group is calling for an end to private jet travel, and that the increase in air passenger duty for domestic private jet travel introduced by the government “is not enough”.

“We need decisive action to decarbonise aviation, starting with stopping unnecessary private flights that only benefit the wealthy one per cent,” she added.

Thames Valley Police and Oxford Airport have both been contacted for further comment on the planned protest.

■

Extinction Rebellion protest outside insurance brokers



Members of XR North Lakes are out on the streets of Penrith today, protesting outside the offices of insurance broker Marsh.

The placard-waving protestors are taking part in a national day of action against insurance businesses which they say are "enabling" the fossil fuel industry by insuring high profile global projects.

Protests also took place at the offices of Marsh Commercial in Carlisle and Kendal.

Allan Todd, former teacher and climate activist, of Keswick, said: "Marsh is one of a number of insurance brokers which continue to facilitate fossil-fuel projects that drive the climate and ecological crises.

"Our action today is also part of the wider Road to Belem campaign, run by the Climate Justice Coalition in the run-up to COP30. We need to act now to avert the worst impacts of climate change and make the planet as habitable as possible for future generations."

This national week of action will be followed by an international wave of action in September, in solidarity with activists on the front line of the new oil and gas projects. ■

extinction rebellion
SCOTLAND

EXTINCTION REBELLION SCOTLAND AND SCIENTIST REBELLION DENMARK PROTEST PRIVATE JETS COMPANY, BLACKBIRD

February 16, 2025

Extinction Rebellion Scotland and Scientist Rebellion Denmark protested at Inverness Airport in Scotland and Billund Airport in Denmark. They were highlighting the contradictions between Blackbird Air's CEO Anders Povlsen private jets enterprise and his Wildland commitment to nature.



Credit: Siobhan Chalmers @_schal

Protesters waved banners outside Inverness Airport in Scotland declaring 'Ban Private Jets' and 'Blackbird Nae mAir' accompanied by others dressed as "blackbirds". A huge banner was laid on the ground with words from the Wildland Ltd. company website "We're in a climate emergency. We need to step up and take action".

Watch Chris Packham's message to the protest.

The protestors were calling for Anders Povlsen "to step up and take action", close down Blackbird Air and invest in clean transportation.

The protests were connected by an innovative two-way live link displayed on monitors at both Inverness Airport and at the Blackbird HQ in Billund Airport Denmark.

XR Scotland and SR Denmark call into account the contradictory behaviours of a so-called "eco-billionaire". One of the largest landowners in Scotland, Povlsen owns Blackbird Air, a luxury private jet business which is set to expand. At the same time Povlsen operates Wildland, a private enterprise which acknowledges the urgent need to act on the climate emergency.



Credit: Siobhan Chalmers @_schal

The use of private jets has soared in recent years, with the resulting climate-heating emissions rising by 50%. Passengers in larger private jets caused more CO2 emissions in an hour than the average person did in a year. Aviation fuel remains untaxed while those using a car to get to work pay their taxes at the pumps.

The aviation industry is promoting Sustainable Aviation Fuel (SAF) but the UK SAF mandate only requires that 2% of the UK's total jet fuel demand be met by SAF in 2025, increasing to 10% in 2030. SAF is always blended with fossil fuels as around 65% of so-called sustainable fuel is kerosene.

However, some airlines and countries are changing. The Danish company, Lego, is closing its private jet division this year. Amsterdam's Schiphol airport announced a ban on private jets in April 2023. Belgium has introduced new taxes on private jets and France is expected to follow.

Dr Sarah Birkby from Extinction Rebellion Highlands and Islands and Moray said:
'It is completely contradictory to state the importance of acting on the climate emergency and at the same time run a private jet company. The time when people, no matter how rich, could say one thing and do the exact opposite is over. As Wildland Ltd itself declares, we need people to step up and take action".

Dr Anthony Graham from Scientists for Extinction Rebellion stated:
"The evidence is clear: our current emissions pathway is incompatible with a safe planet. Every tonne of CO2 fuels climate change, yet private jets – used by the wealthiest 0.003% – emit disproportionate amounts, worsening both the climate crisis and inequality. Scientists for Extinction Rebellion urge action on luxury emissions, stressing that those with the most power must lead by example."

Finlay Asher, a spokesperson for Safe Landing, a global community of aviation workers, said:
"At Safe Landing, our aviation community are firmly of the position that there needs to be a rapid reduction in private jets in favour of cleaner and greener forms of travel. And as a Scottish aerospace engineer, I'd love to see Scotland lead the way and pioneer the genuinely sustainable future of flight. Rather than catering to carbon-intensive flying for an elite minority, Inverness Airport could instead become our green gateway for essential island air travel."

Alex Cochrane from Extinction Rebellion Scotland said:
"Private jets are the quickest way to burn fossil fuels and produce on average 10 times more CO2 emissions per passenger than commercial flights. Though Blackbird Air states on their website 'Our private jets feature the latest safety innovations and energy-efficient engines', the aviation industry expects worldwide another 8,500 private jets will enter service by 2033 (including Blackbird), far outstripping any efficiency gains."



Climate Activists Detained at the “Oscars of the Insurance Industry”

July 09, 2025 by Extinction Rebellion

Early images

“INSURING DISASTER, NOT SURVIVAL”

LONDON 9th July — Climate activists with the Insure Our Survival campaign disrupted the “Oscars of the insurance industry” British Insurance Awards at the Royal Albert Hall tonight, calling out the industry for profiting from climate chaos and genocide in Gaza, while pushing ordinary people to the brink.

Two activists were detained for several hours after getting into the venue and planning to take to the stage to drop a banner. Both have now been released and stand by their actions, saying: "Stop funding ecoside. Stop funding genocide."

As the insurance elite gathered to celebrate their accomplishments this year, activists outside held a die-in on the red carpet, making it hard for attendees to enter. They added a theatrical "F***ing Up the Planet Awards" mocking the biggest insurers for backing oil pipelines, displacing communities, insuring arms exporters and ignoring the climate science.

"These companies talk about resilience, but they're the ones insuring oil pipelines while dropping cover for flood-hit homes," said Lucy Porter, a spokesperson for Insure Our Survival. "They're not part of the solution — they're complicit in the collapse."



Photo credit: Denise Baker

The income made for those in the industry does not come without a cost, at home and abroad. Even in their own communities, we are seeing flooding and destruction of homes. 5.7 million properties in England are currently at risk of flooding [1]. In 2024 alone, the UK saw over £1.6 billion in insured flood losses, with thousands of families displaced [2]. In Yorkshire, Cumbria, and South Wales, some households now face £2,000+ annual flood insurance premiums — or have been refused coverage entirely [3]. Meanwhile, insurers continue to back new fossil fuel infrastructure that worsens

the crisis, including the East African Crude Oil Pipeline (EACOP) and Arctic LNG 2 [4] [5].

AXA and Allianz have come under fire for financial and insurance ties to firms complicit in the Israeli occupation of Palestine, including companies supplying bulldozers, weapons, and surveillance tech used in home demolitions and military operations [6] [7].

“They insure against the destruction of homes abroad, and then leave homes here unprotected,” said another campaign spokesperson. “Their business model is a disaster — so long as it doesn’t affect their balance sheets.”

BRITISH INSURANCE AWARDS: A CELEBRATION OF CLIMATE HYPOCRISY

While the British Insurance Awards claim to reward “innovation and responsibility,” many winners continue to underwrite fossil fuel expansion — a direct violation of international climate goals [8].

Insurers and brokers being called out include:

- Lloyd’s of London — still insuring coal, tar sands, and Arctic oil through its syndicates [9].
- Chubb, AIG — major underwriters of extreme oil and gas projects around the world [10].
- AXA — linked to fossil fuel underwriting and arms-related human rights concerns [6].
- Marsh McLennan — brokers fossil fuel deals including pipelines and coal plants [11].

Many insurers at the British Insurance Awards — including Allianz, Aviva, AXA, Zurich, AIG, RSA, Chubb, QBE, and Liberty Mutual — are not only complicit in climate chaos, but also profit from militarised violence.

They insure or invest in companies supplying military equipment to Israel, including:

- Boeing
- Lockheed Martin
- Elbit Systems
- Maersk (used in military logistics) [12][13][14]

INSURE PEOPLE, NOT POLLUTION

This crisis is personal. Flooding, fires, and heatwaves are here, and insurers are abandoning households while enabling destruction abroad.

It's time to turn public anger into action.

👉 Join the campaign. Demand insurers drop fossil fuels.
👉 Expose their hypocrisy.
👉 Insure our survival — not collapse.

🔗 **[Insure our Survival website]**

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About Extinction Rebellion

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Donate | Support our work
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Why Citizens' Assemblies? | Breaking the political deadlock
XR UK Local Groups | View a map of all local groups
XR UK website | Find out more about XR UK
XR Global website | Discover what's going on in XR around the globe

Time has almost entirely run out to address the climate and ecological crisis which is upon us, including the sixth mass species extinction, global pollution, and increasingly rapid climate change. If urgent and radical action isn't taken, we're heading towards 4 ° C warming, leading to societal collapse and mass loss of life. The younger generation, racially marginalised communities and the Global South are on the frontline. No one will escape the devastating impacts.

Extinction Rebellion target Howden and Marsh offices in Shrewsbury

'We need insurers to stop making things worse and step up to be climate heroes,' says protester

Extinction Rebellion targeted the offices of brokers Marsh and Howden in Shrewsbury in an insurance-related protest.



The group went to Marsh's office in Abbey Foregate at 10am on 11 July 2025, before marching up Wyle Cop to visit Howden's branch on the High Street.

The protest was related to fossil fuels, with protesters calling for the support of new projects to be ended. It featured placards, banners and a Grim Reaper,

One protester said: "Here in Shrewsbury we're already feeling the effects of climate breakdown.

"Shropshire farmers are struggling with the current drought. Homes and businesses are suffering as once in a hundred year floods now happen annually.

“We need insurers to stop making things worse and step up to be climate heroes.”

Other protest

The protest came amid supporters of Extinction Rebellion’s Insure our Survival campaign targeting the offices of insurance companies up and down the country in a national wave of action last week.

During the week, Marsh’s Manchester office in Belvedere, Booth Street, was also targeted, with protesters holding a large Stop Eacop (East African Crude Oil Pipeline) banner.

Eacop is a pipeline that is set to transport oil produced from Uganda’s Lake Albert oilfields to the port of Tanga in Tanzania.

One protester said: “We are already seeing the catastrophic effects of climate chaos on our TV screens.

“Instead of displacing poor people to pipe oil across Africa so that big oil can make even more money, we should be leaving it in the ground. Our message is simple – oil companies need to stop drilling and start paying.”
■

Rebels target insurance HQ in solidarity with detained Ugandan protesters - Extinction Rebellion UK



Rebels target insurance HQ in solidarity with detained Ugandan protesters

July 16, 2025 by Extinction Rebellion

Press contacts: Dorothea Hackman 07710 269195 | XR UK press team 07756136396

BREAKING PHOTOS | PERMANENT ARCHIVE

Extinction Rebellion rebels target AIG as part of a national wave of Insure Our Survival actions against insurance companies fanning the flames of climate risk.

At 12 noon today, July 16th, 2025, protesters were at the offices of AIG in Fenchurch Street, London, demanding it does not insure the East Africa Crude Oil Pipeline (EACOP).

Two letters were delivered – one on behalf of local people directly affected by EACOP and another from the #StopEACOP campaign UK.



Outside AIG, activists in red #StopEACOP suits held a die-in by an EACOP pipeline, and others waved fans declaring 'FANNING THE FLAMES OF CLIMATE RISK' while throwing documents entitled 'UNDERWRITING FOSSIL FUELS' and 'INVESTING IN FOSSIL FUELS' into a mock fire.

Zaki Mamdoo, Campaign Coordinator at StopEACOP said: "Activists and defenders outside AIG's offices today stand shoulder-to-shoulder with communities whose lands, livelihoods, and futures have been sacrificed for the EACOP, its associated projects and the repressive conditions that have followed. This demonstration is a reminder that the destruction we face is not accidental; it is the result of a global system that prioritises profit over people, and places corporate power above human life. The struggle for climate justice demands that ordinary people everywhere confront the institutions responsible for this harm because those causing it operate globally, and so must our resistance."

73-year-old retired lecturer and grandmother from Camden Dorothea Hackman said: **"**Insurance companies like AIG wield immense power and could bring an end to the fossil fuel era. Instead, they collude with short-term profiteering polluters and fan the flames of climate risk."

As a result of global pressure, including from Extinction Rebellion, Insure our Future and the StopEACOP campaign [1], 30 major insurers have pulled out of EACOP to date[2]. However, AIG has still to rule out insuring EACOP.

EACOP is a 'carbon bomb' [3], which would unleash 379 million tons of climate-heating pollution – more than 25 times the combined annual emissions of Uganda and Tanzania the host nations. [4] This will fuel extreme weather worldwide and intensify deadly flooding, landslides, heatwaves, and droughts that are already frequent even in the UK [5].

Insurers are complicit in the climate crisis as oil, gas, and coal industries are legally obliged to insure their operations.

In addition to profits from underwriting insurance, client premiums represent immense funds for insurance companies like AIG – globally, £27 trillion of assets are under management, with UK insurers having £1.8 trillion, and much of this is invested in fossil fuels. [6,7]

This is an unsustainable contradiction. While their investment and underwriting continue to give a lifeline to the fossil fuel companies, already over a third of weather-related claims are for climate-attributed losses.[8]

Meanwhile, climate change is doubling or even tripling the cost of home insurance for ordinary homeowners [9] and coverage is denied to many households impacted by climate change.[10]

Yet the size of the renewable energy insurance market is still under 30 per cent of the fossil fuel insurance market.[11] This mismatch of priorities is an obstacle to the urgently needed transition to clean energy. [12]

EACOP has already displaced thousands of families in Uganda and Tanzania and is threatening food and water security and violating human rights, while disturbing critical ecosystems including Lake Victoria and Murchison Falls National Park [13, 14].

TotalEnergies, the majority shareholder and investor of EACOP, is accused by the UN special rapporteur on environmental defenders of 'grave human rights violations against those opposing the projects and against the local communities, particularly in Kingfisher'. [15]

At time of writing, 11 activists, the KCB11, have been detained and refused bail for 84 days for attempting to deliver a letter to Kenya Commercial Bank in Kampala.

"It's hard to imagine a more vivid picture of corporate-state collusion than activists being led into a trap and arrested for trying to share their concerns about a fossil fuel project characterised by rights and environmental harms," said Brad Adams, Executive Director at Climate Rights International.[16]

These national days of action in July will be followed by a wave of international action in September, in solidarity with activists on the front line of new oil and gas projects.

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Extinction Rebellion (XR) is a decentralised, international and politically non-partisan movement using nonviolent direct action and civil disobedience to persuade governments to act justly on the Climate and Ecological Emergency.

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Time has almost entirely run out to address the climate and ecological crisis which is upon us, including the sixth mass species extinction, global pollution, and increasingly rapid climate change. If urgent and radical action isn't taken, we're heading towards 4˚C warming, leading to societal collapse and mass loss of life. The younger generation, racially marginalised communities and the Global South are on the frontline. No one will escape the devastating impacts.

■

Reading: Extinction Rebellion protest above A329 motorway

The Tax the Rich banner by Extinction Rebellion activists dropped above the A329M between Reading, Wokingham and Bracknell. *(Image: Extinction Rebellion)*

Two mystery banners were seen on a bridge over a busy motorway.

The banners above the A329M bore the slogan 'Your Planet Needs You' while the other said 'Tax the Rich,' and both have since been claimed by Extinction Rebellion.

"Heatwaves are becoming fiercer and more frequent, and not addressing the climate crisis will be far more costly than tackling it," said an Extinction Rebellion spokesperson.

"There is also a growing call for the super-wealthy to be taxed. According to Oxfam, a 2% tax on extreme wealth over £10 million could raise £24 billion every year.

"78% of the British public say they support this. Money raised could supercharge the UK's efforts to tackle climate change."

Greenpeace has called for a one-off "National Renewal Tax" of 2.5% on individual wealth above £10m, to be paid annually over the five years of this parliamentary term, which could raise between £130bn and £183bn. This tax would be paid by 0.1% of the UK population.

The National Renewal Tax on the super-rich could raise between £26bn and £36.6bn on average each year.

"Funds raised would be 'more than enough' to pay for insulating homes, supporting vulnerable households with winter energy bills, providing free bus travel to under 25s, implementing a scrappage scheme for polluting vehicles, retraining works for green energy jobs, upgrading ports, and supporting farmers to clean up waters and return land to nature," the spokesperson said.

"According to a new report, the potential UK economic losses by 2040 due to stranded fossil-fuel assets is £113bn.

"Of the £88bn held in fossil fuel assets by UK pension funds, around £15.2bn is at risk of stranding by 2040.

"Yet BP and Shell are backing off from their 'green' promises, and other fossil fuel companies are still pushing ahead with projects."

A growing number of climate groups are campaigning for the introduction of a wealth tax.

The Pay Up campaign is calling on the government to bring in a series of wealth taxes as an alternative to spending cuts.

Climate groups say the revenue from the ultra-rich could fund investment, restore crumbling public services and help tackle the climate emergency. Opponents have raised concerns that such a move would result in the ultra-wealthy leaving the country.

However, experts say there is no evidence of a mass millionaire exodus from the UK, with the overall number of millionaires and billionaires having risen steadily over the past two decades.

At the same time, the government has little idea of how many billionaires pay tax.
■

Extinction Rebellion protesters 'die' during demonstration at bank



XR protesters 'die' during a demonstration at Barclays in Oxford *(Image: XR Oxford)*



Scientists for XR occupy the Bank of England

July 23, 2025 by Extinction Rebellion

Press contacts: Shana 07546 166787 | XR UK press team press@extinctionrebellion.uk

Photos: https://drive.proton.me/urls/WFVCDS5XJR#OEow1XVNSOdf

Early on Wednesday 23rd of July, five scientists occupied the lobby of the Prudential Regulation Authority (PRA), part of the Bank of England.

Five scientists remained in the PRA's lobby from 8am until 9am, during the morning arrival of employees, demanding capital requirements on fossil fuels in the insurance and banking sectors. Three more offered flyers to staff inviting them

to an international network of financial regulators working for an end to fossil fuels expansion projects. [Signal link]

This protest took place during the second to last week of the PRA's public consultation on climate risk in insurance and banking, entitled 'Enhancing banks' and insurers' approaches to managing climate-related risks' [1]. The protestors argued that the PRA should be doing more to regulate these industries in a way that mitigates climate-related risks, by introducing capital requirements that would discourage providing financial and insurance support to the fossil fuel industry that is leading us ever deeper into climate catastrophe.

Capital requirements are the amount of liquid capital that must be held by a firm, reflective of the risk of their assets, in order to help protect the economy from collapse. Capital requirements on fossil fuels would deem these assets riskier and increase the manditory amount to be held, thereby discouraging the holding of these assets.

The scientists taking part insist that climate and ecological breakdown must be central to discussions around mitigating economic breakdown – allowing insurance and banking sectors to continue to insure and loan to fossil fuel companies does not follow scientific consensus or economic logic. Signs were held with calls to action, "Climate tipping points = economic risk. Stop new fossil fuels, capital requirements now" and "Ecosystem collapse is financial collapse, capital requirements for fossil fuels now".

Signs also quoted Günther Thallinger, Allianz SE board chairman from his March 2025 article 'Climate, Risk, Insurance: The Future of Capitalism' [2] stating "This is about saving the conditions under which markets, finance, and civilization itself can continue to operate. [...] There is only one path forward [...] burning less carbon or capturing it at the point of combustion."

"*Those that work in insurance and at the PRA, like us scientists, know how dire the situation is,*" said Shana, Space Engineer and occupier of the lobby. "*To talk about 'managing climate-risk' in regard to banking and insurance operations whilst ignoring the fact that these same firms are enabling new oil and gas projects is baffling. They're advising companies on how to manage a crisis that these same companies are actively contributing to – it's like giving fire safety training to the person lighting the flames. Instead of just managing risk we need to actively be mitigating risk – something the PRA can do through capital requirements on fossil fuels for banks and insurers.*"

The PRA, in its latest paper on climate risks in the financial sector, admits that most banks and insurance companies are not properly analysing their climate related risks, and the industry requires work at a governance level to better understand climate risks including climate scenario analysis (eg. unprecedented, non linearity, tipping points) to

fully capture future risks [1]. A recent article in the Financial Times quotes senior Bank of England staff who resigned over the deprioritization of climate and nature risks [3].

Capital requirements on fossil fuels is not as radical an idea as it may seem – the European Insurance Authority (EIOPA) recommendeds capital requirements on fossil fuels "to accurately reflect the high risks of these assets" [4] and capital requirements are mentioned in the PRA consultation paper's current iteration. However the PRA still states that no new capital requirements will be imposed on top of what is required now. This results in little financial incentive for banking and insurance firms to reduce their involvement in new oil and gas expansion projects, missing a vital opportunity to incentivise meaningful change in our financial sector.

[1] CP10/25 – Enhancing banks' and insurers' approaches to managing climate-related risks – Update to SS3/19, https://www.bankofengland.co.uk/prudential-regulation/publication/2025/april/enhancing-banks-and-insurers-approaches-to-managing-climate-related-risks-consultation-paper

[2] 'Climate, Risk, Insurance: The Future of Capitalism'
, https://www.linkedin.com/pulse/climate-risk-insurance-future-capitalism-g%C3%BCnther-thallinger-smw5f

[3] Financial Times: Bank of England staff depart after downgrade of climate risk, https://www.ft.com/content/c9919c02-8328-4fa0-af4d-a108770a9f73

[4] EIOPA recommends a dedicated prudential treatment for insurers' fossil fuel assets to cushion against transition risks, https://www.eiopa.europa.eu/eiopa-recommends-dedicated-prudential-treatment-insurers-fossil-fuel-assets-cushion-against-2024-11-07_en

About Extinction Rebellion

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Ten Greenpeace activists arrested after suspending themselves from bridge outside Edinburgh

The protesters dangled themselves 25m above the water line, stopping a tanker from delivering gas for 24 hours.

Saturday 26 July 2025 12:38, UK



Protesters suspended themselves from the Forth Road Bridge. Pic: Greenpeace

Ten Greenpeace activists have been arrested after suspending themselves from a bridge over a river to halt a tanker carrying fracked gas.

The Forth Road Bridge outside Edinburgh was closed on Friday due to the demonstration, with Police Scotland alerted shortly after 1pm.

The protesters ended up dangling around 25m above the water level at high tide.



The group said its activists had prevented the tanker from delivering gas. Pic: Greenpeace

Greenpeace announced it had ended the demonstration on Saturday morning, saying it had "achieved what we set out to do".

The group said its activists had prevented the Ineos tanker from delivering the gas for a full 24 hours, because the vessel could only travel to the Ineos petrochemical plant at nearby Grangemouth during high tides.

Its specially trained activists began climbing down their ropes on Saturday morning.

Greenpeace said all 10 descended safely and were voluntarily transported to Port Edgar in South Queensferry, where it said they were arrested by officers from Police Scotland on suspicion of culpable and reckless conduct.

Police Scotland confirmed five men aged between 35 and 40, as well as five women aged between 25 and 42, had been arrested.

It said further inquiries were ongoing and the Forth Road Bridge remained closed to traffic as of Saturday morning.

Read more:
25% of young children now malnourished in Gaza, charity says
Trump issues warning to leaders as he arrives in Scotland

Amy Cameron, programme director at Greenpeace UK, said: "By blocking Ineos, we've drawn global attention to the company's bottomless appetite for plastic production, false solutions and profit for its billionaire boss Jim Ratcliffe."

Describing the "plastic pollution problem" as "massive", she added: "Less than 10% of plastic is currently recycled globally, and this is set to rise to just 17% by 2060, while the amount of plastic we're producing is set to triple.

"The only solution is to address the problem at source which means securing a strong global plastics treaty that imposes legally-binding caps on plastic production."

Greenpeace insists its protest was safe and caused "minimal disruption".

It stressed the climbers had spent weeks training for the demonstration and pointed out the Forth Road Bridge carries low volumes of bus, cycle and pedestrian traffic.

Bank of England 'heist' as ministers face fresh anti-Rosebank oil field protests



Protesters outside the Bank of England. Photo: Fossil Free London

MINISTERS have faced a fresh protest against their possible renewal of permission for the Rosebank oil field, after the original decision was found to be unlawful in a landmark Supreme Court ruling last year.

Fossil Free London activists dressed as robbers emblazoned with the Norwegian flag staged a "heist" at the Bank of England on Monday evening to highlight the "daylight robbery" that approval of of the application for exploitation of the oil field would entail.

Rosebank is the largest undeveloped oil field in the North Sea. If its development goes ahead, this would lead to the release of carbon emissions equal to those produced by all of the world's 28 low-income countries, the activists said.

Chanting "Rosebank Oil is a scam. Labour, do you give a damn?" the campaigners carried sacks labelled "UK taxpayer money" filled with fake cash from a makeshift vault and held placards reading "£1.5 billion for Norway, net loss for UK."

Fossil Free London director Robin Wells said: "It's plain and simple, Rosebank is daylight robbery.

“If allowed, Equinor, a Norwegian oil giant, will rob us blind, hoarding massive profits for themselves and leaving behind nothing but a trail of climate chaos and a net loss for us.

“The UK government needs to stop this carbon bomb and act in the interests of the general public — scrap Rosebank and invest in a just transition.”

In January, the Court of Session in Edinburgh found that a Supreme Court ruling that planning authorities should consider the full climate impact of burning oil from new wells should apply retrospectively to the former Tory government’s decision to approve the Rosebank and Jackdaw oil and gas fields.

The environmental assessments for these projects did not count the greenhouse gases that would be released when the fossil fuels produced by them were eventually burned.

The January ruling said that work on both fields could continue while the new information was gathered, but no oil and gas could be extracted unless fresh approval was granted.

Ministers later confirmed that they would consider the significance of a project’s environmental impact, “while taking into account and balancing relevant factors on a case-by-case basis, such as the potential economic impact and other implications of the project.”

No decisions are expected until the autumn.

The Department for Energy Security and Net Zero was contacted for comment.

Morning Star for Peace and Socialism

Direct Action / 18 August 2025

Activists cut utilities to world's biggest fossil fuel investors declaring 'Summer of Sabotage'



Shut the System activists cut the electricity to Barclays' Barclaycard's Northampton headquarters, August 18, 2025

ACTIVISTS sabotaged utilities infrastructure at the offices of major fossil fuel investors today, declaring the start of “disruption like never before” against fossil fuel finance.

Shut The System cut cables and superglued electrical service cabinets at JPMorganChase and Allianz in London, demanding they stop financing the climate emergency and genocide in Gaza.

At Barclaycard’s Northampton headquarters, activists cut the 5G communications mast serving the building.

The underground climate campaign said the action marked the launch of a period of sustained sabotage against financial institutions deemed “key culprits” in the climate crisis, running until the end of September.

It urged civilians to join a “Summer of Sabotage” by destroying the property and operating systems of institutions providing “critical support to deadly industries globally.”

JPMorgan is the world’s largest fossil fuel investor, while Barclays is the biggest in Europe, according to a June report by Reclaim Finance.

And Allianz is the sixth-largest fossil fuel insurer and insures Elbit Systems, an Israeli arms firm supplying the majority of weapons used in Gaza.

A Shut The System statement said: “We have been forced underground by draconian anti-protest laws.

“The British state has recently shown how much they are willing to suppress peaceful protest.

“History shows direct action and sabotage are highly effective so we cannot stop while the climate emergency wages on and we see the most hopeful path forward is to operate beyond the state’s reach.”

The group has pledged to escalate its actions in October if demands are ignored.

Earlier this year, it cut fibre optic cables at insurance firms in Leeds and Birmingham, disrupted internet access, and carried out nationwide graffiti

actions at Barclays branches during its annual general meeting.

JPMorgan, Allianz and Barclays were approached for comment.

Extinction Rebellion 'unearth the truth' at Welwyn Garden City protest

The Welwyn & Hatfield Times

26 Aug 2025 13:00

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Author: Huw Richards
Print Edition: Welwyn Hatfield Times
Length: 391 words

Body

Extinction Rebellion claim to have "unearthed the truth" about a Welwyn Garden City insurance broker during a demonstration.

On Saturday, August 23, members of Hertfordshire Extinction Rebellion groups, dressed as oil workers and insurance executives, protested outside Howden Insurance in the town centre.

Extinction Rebellion members protest outside Howden, Welwyn Garden City. (Image: Derek Langley)

-The group called the protest due to its belief that Howden "supports the fossil fuel industry".

At the action on Saturday, an oil rig was set up outside the Howden branch, and members of the group dressed as oil workers allegedly "engaged" with Howden-s senior executives.

Phil from North Herts Extinction Rebellion said: "I hope people found our actions today both eye-opening and entertaining. Although there is widespread concern about the climate crisis among the public, the influence of the insurance companies on averting disaster may not be so well known.

"If a new oil or gas project can-t get insurance they simply can-t operate, so the insurance companies are in a uniquely powerful position.

"But companies like Howden are still actively supporting these industries, while at the same time home insurance premiums are doubling or even tripling to pay for the increased risks from extreme weather events like flooding and heatwaves. This is good business for them and a disaster for the rest of us."

(Image: Derek Langley)He added: "Many of us use Howden to insure our homes, cars, and even our pets. But they are secretly making millions by also acting as brokers for new oil, gas, and coal projects - despite dire warnings from scientists.

"We were asking Howden to do the right thing: pull the plug on insuring any new fossil fuel projects - this would send a powerful signal to the industry."

The demonstration was part of Extinction Rebellion's --Insure Our Survival" campaign, urges insurance companies to withdraw from insuring new fossil fuel operations which are believed to be worsening the climate crisis.

Insurance offices up and down the country have been targeted in a wave of nationwide actions, with activists demanding that key insurers stop backing destructive new fossil fuel projects and end their complicity in climate disaster and human rights abuses.

When contacted, Howden did not wish to comment.

(Image: Derek Langley)

Classification

Industry:
Insurance (92%), Insurance Overview (92%), Fossil Fuels (89%), Insurance Agencies & Brokerages (89%), Energy & Utilities (89%), Homeowners Insurance (78%), Property & Casualty Insurance (78%), Natural Gas Extraction (75%), Insurance Premiums (73%), Coal Industry (50%)

Subject:
Protests & Demonstrations (91%), Negative News (90%), Environmental Activism (90%), Negative Misc News (90%), Fossils (89%), Negative Environmental News (89%), Climate Change (89%), Severe Weather (88%), Environmental Accidents & Disasters (79%), Activism (78%), Negative Personal News (78%), Executives (77%), Floods & Flooding (73%), Heat Waves (68%), Weather (68%), Extreme Temperatures (68%), Human Rights Violations (63%), Human Rights (60%)

Climate protesters removed from Reform conference after heckling Nigel Farage

The protesters from Climate Resistance targeted the Reform leader to accuse him of working for super-rich donors.



A protester is removed from an address by Reform UK leader Nigel Farage during the party's annual conference (Jacob King/PA) (PA Wire)

Three climate protesters were carried out of the Reform UK party conference after shouting at Nigel Farage while he was on stage.

The protesters from Climate Resistance, a group calling for the government to tax the super-rich to fund public services and climate action, had planned to interrupt the Reform UK leader and Clacton MP during his keynote speech.

But he delivered it several hours earlier than originally planned after Angela Rayner resigned from the government.

They staged their protest as Mr Farage returned later to appear with special guest Preston Manning, the founder of Canada's now-defunct Reform party.

Climate Resistance targeted Mr Farage to accuse him of working for super-rich donors, such as property tycoon Nick Candy.

“You work for billionaires!” one shouted at Mr Farage.

Another said he was “paid by the super-rich to scapegoat migrants”.

Mr Farage paused to say: “Off you go, mate…boring!”

One shouted “f*** the fascists” and “tax the rich” as security guards carried her out.

The audience chanted “out out out” and booed her.

Sam Simons, spokesperson for Climate Resistance, said: “Farage will go on national TV and say how he cares about the people in the UK, and then vote to keep us from getting our sick pay.

“This grifter will scapegoat anyone just so we don’t talk about the oil barons and billionaire property tycoons who fund him.

“It’s really about keeping everyone so divided and downtrodden that we won’t even have time to think about taxing the super-rich.”

Mr Simons added: “Meanwhile, the super-rich are fanning the flames of climate collapse with their lavish lifestyles, and exploiting people and the planet for profit.

“The top 10% in the UK hold more wealth than all the rest of us combined, and pollute far more than ordinary people.

“The majority of Britain wants a wealth tax. It’s time to tax the super-rich and finally do what Reform never would: fund our schools, our hospitals, our climate and our futures.”
■

Campaigners around the country fight to stop Rosebank



CAMPAIGNERS to stop Rosebank took to the streets across the country on Saturday, protesting outside the offices of oil giants and in Prime Minister Sir Keir Starmer's backyard.

In Aberdeen, environmentalists joined forces with Scottish Palestine Solidarity Campaign (SPSC), protesting at the offices of Equinor and Ithaca to call for a ban on the development of the 300-million barrel field.

Speaking from the protest — one of almost 20 which took place around the country — Aberdeen SPSC activist, Kate Ramsden told the Star: "Rosebank isn't just an environmental disaster, Ithaca's involvement would generate hundreds of millions for Delek who are already literally fuelling the genocide in Gaza.

"Starmer needs to locate his conscience and stop Rosebank."

Four hundred miles away, campaign groups including Mothers Rise Up took that same message to the heart of Sir Keir's Holburn and St Pancras constituency.

Mothers Rise Up's Lorna Powell said: "Approving new fossil fuel projects like Rosebank in the context of an escalating, deadly climate crisis is simply unjustifiable."

The Department for Energy Security and Net Zero said its priority was to “deliver a fair, orderly and prosperous transition,” but could not comment on individual licences.

■

Two insurers named as targets in next Extinction Rebellion climate protest offensive

Two insurers are in the sights of Extinction Rebellion's next coordinated climate protest campaign

Insurers operating in the UK have been warned to expect a fresh wave of coordinated climate protests in September.

Activist group Extinction Rebellion (XR) has confirmed plans to target companies it says are enabling fossil fuel projects and arms trading.



Its campaign – dubbed *Insure Our Survival* – is set to run from 8 to 22 September 2025, with large-scale demonstrations confirmed for London on 8 and 9 September and further actions planned nationwide.

XR said the campaign would include coordinated actions in Europe, the Americas, Africa and Asia, with groups in the Global North working alongside those in the Global South to "amplify frontline voices" opposing fossil fuel and arms financing.

Targeted insurers

XR said the campaign will focus on international firms Axa and AIG, saying the call for action is an effort to draw attention to the broader insurance sector's role in underwriting high-carbon and defence projects.

The group claims fossil fuel and arms insurance represent just 2% to 3% of targeted firms' portfolios, arguing they could be removed without material financial harm.

Insurers have faced increasing scrutiny from climate campaigners in recent years, with several large players adopting restrictions on coal, oil and gas underwriting in response to public and shareholder pressure. However, XR maintains that such commitments remain inadequate to meet climate goals.

The September actions will form part of XR's ongoing global pressure campaign, which the group says will continue until targeted insurers commit to stopping fossil fuel and arms underwriting.

■

Protesters project ‘toxic’ images onto insurers’ City offices

‘Axa and AIG present themselves as protecting homes and families, yet continue to underwrite projects that accelerate climate breakdown and fuel conflict,’ says spokesperson

Activists staged protests at the City of London offices of Axa and AIG yesterday (8 September 2025), blocking access to the buildings and calling on insurers to stop underwriting fossil fuel and defence-related risks.



The demonstration formed part of a two-week wave of coordinated global actions led by campaign group Insure Our Survival, which is planning protests across more than 30 cities worldwide between 8 and 22 September. Demonstrations are also scheduled in London for today.

According to organisers, the London blockade began around 8am outside Axa’s offices, with campaigners dressed in suits and gas masks carrying placards urging a boycott of Axa and AIG. Activists also threw fake blood-stained £50 notes and projected images onto buildings as part of the action.

The campaigners accused both insurers of profiting from fossil fuel expansion and from companies linked to armed conflict. They argued that such underwriting activities account

for less than 2% of global insurance profits, suggesting that insurers could exit the sectors without significant financial impact.

Lucy Porter, UK spokesperson for Insure Our Survival, said: "Axa and AIG present themselves as protecting homes and families, yet continue to underwrite projects that accelerate climate breakdown and fuel conflict."

Carbon boycott

Yesterday's London action followed a weekend of projection protests at Axa and AIG offices in London, Paris, Cologne, Johannesburg, Manchester, Glasgow, Auckland and Ipswich. Images of senior executives wearing gas masks were projected onto buildings, which campaigners said symbolised insurers' exposure to "toxic" industries.

Research cited by organisers alleged that Axa holds investments in fossil fuel firms linked to so-called "carbon bomb" projects, including coal, oil sands and shale operations. At the same time, AIG has been identified as one of the world's largest coal insurers with more than $24bn (£17.73bn) invested in fossil fuel-related assets as of 2022.

Extinction Rebellion (XR) previously occupied AIG's office in London on October 30, 2024.

Speakers from climate and political groups, including Palestine-focused organisations, also scheduled addressed the demonstration throughout the day.

Insure Our Survival said it is also encouraging consumers and businesses to boycott other large insurers, including Allianz and Aviva.

Extinction Rebellion (XR) previously protested at the Premiership rugby final on June 14, 2025, to demand that the Rugby Football Union (RFU) end its sponsorship deal with Allianz.

■

Extinction Rebellion protesters stage ‘die in’ at Barclays Bank in Reading



Protesters from Extinction Rebellion performed a 'die-in' at Barclays Bank in Reading to link fossil fuel funding to climate change and global deaths.

Extinction Rebellion says: "Around the world, millions of people are dying as a result of heatwaves, wildfires, torrential rain, drought, flooding and landslides, all caused by changes in our climate brought about by the constant increase in greenhouse gas emissions.

"Barclays Bank is still funding fossil fuel projects which contribute to climate change, thus indirectly contributing to the deaths of humans and wildlife.

"Analyses from the World Weather Attribution organisation show that extreme weather is becoming more likely due to climate change.

"Heatwaves are the deadliest type of extreme weather globally, contributing to at least 500,00 deaths a year, including some in the UK. Researchers from the London School of Hygiene & Tropical Medicine (LSHTM) and Imperial College London, estimate that high heat killed 2,300 people across 12 major cities as temperatures soared across Europe this summer. They attributed 1,500 of the deaths to climate breakdown, which is heating the planet and making the worst extremes even hotter."

Dr Ben Clarke, researcher at the Centre for Environmental Policy at Imperial College London, said: "Heatwaves don't leave a trail of destruction like wildfires or storms. Their impacts are mostly invisible but quietly devastating – a change of just 2 or 3C can mean the difference between life and death for thousands of people.' He warned that countries need to speed up the transition from fossil fuels to renewable energy.

Greece, Turkey and Cyprus suffered devastating wildfires. Greece experienced a heatwave above 45C, drought and strong winds. At least 17 lives were lost, including 10 firefighters and rescue workers.

An intense two-week heatwave in Norway, Finland and Sweden was hotter, with temperatures of 30C and more, resulting in many more hospital admissions.

A new study, published in the medical journal JAMA, links more than 400 additional deaths to the wildfires in Los Angeles earlier this year. The study comes as hundreds of wildfires burn across the US and Canada.

Climate change not only increases the risk of wildfires around the world but also makes them particularly explosive. Relatively small blazes rapidly "blow up" so suddenly and with such ferocity that they become difficult to control.

Climate change also intensified heavy monsoon rain in Pakistan, which suffered its worst floods on record, killing hundreds of people.

In late June 2025, several days of heavy rainfall swept across Colombia and Venezuela, causing widespread flooding, overflowing rivers, and numerous landslides, one of which killed 27 people.

Moscow suffered its worst flooding since 1879, with some parts experiencing far more than the monthly average.

These extreme weather events will only continue to become worse if governments do not do more to reduce emissions from greenhouse gases such as carbon dioxide and methane·

Extinction Rebellion will pose as dead bodies (a 'die-in') to remind people of how they say that Barclays continues to fund projects that are contributing to over-heating planet Earth. Extinction Rebellion also says that they also hope to encourage visitors to the branch to move their accounts from Barclays to other banks with much 'greener' credentials.



■

Extinction Rebellion protestors spotted in Ipswich

Ipswich Star

15 Sep 2025 11:27

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Author: Paris Maben-Hume
Print Edition: Ipswich Star
Length: 271 words

Body

Extinction Rebellion protestors were seen outside a block of offices in Ipswich.

Local activists for the environmental movement in the Suffolk town and nearby Colchester are taking part in a coordinated global campaign targeting insurance giants AXA and AIG.

The campaign started on September 8 and will run until September 22.

It is calling for a boycott of the insurance giants and their sub-brand and is urging people to switch providers.

READ MORE: School pledges 'rapid' change after being issued with government warning

The protestors held up banners outside the entrance to the office block(Image: Newsquest)

On Monday morning, Extinction Rebellion Ipswich was protesting outside the AXA building at Brooke Lawrence House in Civic Drive.

The group held up banners which read: "We are all vulnerable. Stop insuring fossil fuels."

Blue and white tape saying "climate crime scene" was put up on the entrance steps to the office block.

They also handed out flyers to passers-by and AXA staff.

READ MORE: Hundreds of staff at housing association have data leaked in payroll breach

Tina, from Extinction Rebellion Ipswich, said: "Ipswich is on a tidal river, so people are already living with the risk of flooding, and this will only get worse as the climate gets hotter.

"New homes have just been built along the riverside. How long will it be before these become uninsurable?

"Knowing that AXA is not only profiting from these crises but exacerbating them while claiming to protect us is outrageous.

"As we have a large AXA office here in Ipswich, I thought it was important to join this global campaign to highlight this issue locally."

Classification

Industry:
Insurance (90%), Insurance Overview (90%), Energy & Utilities (73%), Data Breaches (66%), Fossil Fuels (54%)

Subject:
Negative Misc News (93%), Environmental Activism (92%), Protests & Demonstrations (91%), Negative News (90%), Activism (90%), Community Activism (90%), Environmentalism (78%), Environment & Natural Resources (78%), Negative Personal News (78%), Government & Public Administration (71%), Negative Technology News (68%), Rivers (66%), Data Breaches (66%), Crime, Law Enforcement & Corrections (53%)

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Wash It Off: Private jet sprayers found guilty



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 today. They took action with Just Stop Oil to demand the UK government negotiate a treaty to phase out oil and gas by 2030. [1]

Jennifer Kowalski, 29, from Dumbarton, and Cole Macdonald, 23, from Brighton, had cut through the wire perimeter fence and sprayed paint from a fire extinguisher onto two private jets parked at Stansted Airport, just hours after Taylor Swift's plane had landed. [2]

After the 4 day trial the jury returned a unanimous verdict of guilty. Sentencing will be on the 27th of October.

During the trial, the prosecution argued that extensive professional cleaning was required for the two planes after the action. The total cost of cleaning was assessed to be around £12,000.

The defendants told the jury they did not set out to cause damage. They explained that they had deliberately avoided spraying the engines and cockpits and believed the diluted

paint would wash off easily. They argued that they lacked the necessary criminal intent: they neither intended to cause damage nor realised that damage was a likely consequence of their actions.

In her defence Jennifer Kowalski explained that the action had been designed to target Taylor Swift's plane because of her personal interest in the famous singer and the immense influence that she carries. She said:

"She's one of the most famous people in the world; she's talked about everywhere, she's the only singer ever to be named Time Magazine Person of the Year; she earned 2 billion dollars last year; reporters devote their lives to covering her; if we devoted that much energy to tackling climate change we could change things.

"I thought a lot about what she might say – if we could get her attention – if she saw this it might get a reaction from her, from a place of care from a fan, instead of from a place of apathy – she's famous for saying how much she loves her fans, and yet her fans are dying because of climate change."

At trial, Judge Mill ruled that the damage was too serious for the rights to free expression and assembly under Articles 10 and 11 of the European Convention on Human Rights to apply. As a result, the jury was not asked to consider whether a restriction on the defendants rights to protest was proportionate response in the light of the alleged damage, and that defence was blocked from the trial.

Following the verdict Cole MacDonald said:

"We were released from remand the day before the general election that elected a left wing government and that under that government the country has slipped into fascism and has become continually more corrupt."

Jennifer Kowalski said:

"I broke into Stansted airport to spray paint Taylor Swift's private jet because this is a dangerous time – the era of global boiling. This era will not end when it's time for a new album – it's the era to end all others.

"*When I look out people's windows, I see entire settlements swept off the map and thousands killed by climate disasters. On this reckless path 1 billion people will be displaced by 2050. When you strip people of their basic rights and cram them into perilous conditions violence inevitably ensues.*

"But it's not too late to be brand new. I just think you are what you love. And I'll fight for the music and people I love. Won't you?"

While two young people face an uncertain penalty for taking action targeting private jet use, it is estimated that 80% of the world's population has never taken a flight. Just 1% of people cause 50% of global aviation emissions and private jet users are responsible for up to 14 times as much carbon emissions compared with a commercial flight. A single flight in a private jet can easily emit as much carbon dioxide as the average annual carbon footprint for an EU citizen – 8.2 tonnes. Private aviation contributed at least 15.6 Mt CO_2 in direct emissions in 2023, or about 3.6 t CO_2 per flight. Almost half of all flights (47.4%) are

shorter than 500 km. Private aviation is concentrated in the USA, where 68.7% of the aircraft are registered. [3] [4] [5][6]

Morning Star for Peace and Socialism

Scotland / 22 September 2025

Insurance giant accused of 'keeping killers safe' at Glasgow protest



Protesters outside AXA offices. Photo: Extinction Rebellion Scotland

Stop Rosebank



Any day now, the UK government will face a major climate test. Equinor is expected to reapply to develop Rosebank: the biggest undeveloped oil field in the UK.

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Activists disrupt BP panel over hurricane-fuelling profits



[Pic: Fossil Free London]

ACTIVISTS have disrupted a panel event featuring senior BP executive Stewart Macfarlane, as the oil giant announced quarterly profits of $2.2 billion (£1.7bn), surpassing analysts' forecasts.

Campaigners from Fossil Free London interrupted the discussion on Tuesday evening, chanting: "As Hurricane Melissa tears down lives, do your profits help you sleep at night?" before being escorted out of the event hosted by the Association of International Energy Negotiators at Simmons & Simmons LLP's London office.

The protest came just days after Hurricane Melissa devastated Jamaica, with scientists warning that the climate crisis intensified the storm's impact.

BP has faced mounting criticism after scaling back its climate commitments.

Earlier this year, the company increased its annual investment in oil and gas to $10bn (£8.2bn) while cutting more than $5bn (£4.1bn) from its low-carbon spending plans.

A Global Witness analysis found that the rollback could cause around 72,000 additional heat-related deaths worldwide by the end of the century.

Fossil Free London director Robin Wells said the BP profits show that the company's "green mask has slipped to reveal the oily mouth behind," accusing the firm of fuelling global destruction while "CEOs and shareholders wine and dine in luxury."

■

Campaigners disrupt Oil Executive awards dinner in London

To highlight damage caused by the oil and gas industry, campaigners from Fossil Free London interrupted the World Energy Council Assembly's dinner at the Hilton in Mayfair on 3 December.

Oil and gas executives had gathered to present and receive industry "achievement awards". Award nominees and attendees included Shell, BP, and Ithaca Energy.

Campaigners chanted "no awards for climate criminals", as they were dragged out of the building by security.

The protest comes after devastating flooding has killed at least 1,250 people across much of southeast Asia in recent days. Human-caused climate breakdown has increased the intensity of such extreme weather events.

Oil damages

A report recently found that oil and gas giants are responsible for €25 trillion in climate damages. Now, survivors of Super Typhoon Odette in the Philippines are suing Shell for damages, in a legal first for holding big oil accountable for its role in climate destruction.

Robin Wells, Director of Fossil Free London said:

> *Whilst executives drink champagne in tuxedos, the world floods outside. They pat themselves on the back for the 'deal of the year', whilst their projects sign death warrants for communities in the Global South and future generations everywhere.*
>
> *How can it be that business as usual awards the fossil fuel corporations that depend on the systematic destruction of our life support systems? The science is clear: every new oil field is an act of violence. We crashed their party to remind them that history will not give them an award; it will put them on trial.*

Featured image via the Canary

■

DE Southern Daily Echo Follow 9.1K Followers

Arrest made as climate activists stage protest in Southampton

Story by Ross Marshall • 5mo • 1 min read



The protesters took to Threefiled Lane in Southampton (Image: NQ)

A woman has been arrested during a climate protest in Southampton today.

Campaign group, Cut The Ties To Fossil Fuels, have taken to Threefield Lane in Southampton to stage a demonstration today.

The group were seen holding signs and banners, reading 'cut ties to carbon pollution' and it is understood that police arrested one of the protesters at the scene.

Hampshire police have been approached for more information on the arrest.

A police spokesperson said: "We were called at 12:41pm today (Wednesday 10 December), to reports of a protest at a business on Threefield Lane in Southampton.

"Officers are in attendance.

"Policing these events requires us to balance the rights of those lawfully protesting, and the rights of others to go about their lives without being subject to unacceptable disruption, whilst keeping the public safe.

"Our priority with protests is always public safety."

Activists stage Extinction Rebellion protest against private jet expansion in London



Extinction Rebellion campaigners gather outside the Macquarie Group headquarters to protest the proposed expansion of Farnborough Airport. Two activists, dressed in airplane costumes, occupy the entrance canopy while unfurling a banner that calls for a ban on private jets and urges the investment firm to sever its connections to fossil fuels. The demonstration highlights the environmental impact of business aviation, as the Australian-based global financial services group faces criticism over its majority ownership of the airport and its plans to increase annual flight limits. (Photo by Joao Daniel Pereira/Sipa USA)

■

Cut ties to Big Oil to stop energy crisis sparked by Trump's war on Iran – protest footage

Outside the US Embassy in London on 1 April, two activists were tied by fuel hoses to a life-sized petrol pump in response to Donald Trump's war on Iran.

The protest criticised the increase in oil company profits in the wake of the war's destruction and trade disruption. The pump carried the label: "Oil Profit$$$ for Oil Bosses".

Campaigners from Fossil Free London held signs saying "Stop Trump Tying us Into Fossil Fuels", "Break Free from Climate Crisis" and "Break Free from Big Oil".

Thousands have died to date across the region following US and Israeli attacks on Iran. Trump has recently stated his intention to "take the oil in Iran" following major attacks on fossil fuel infrastructure.

Meanwhile, oil dependency is increasing the cost of living once again for families in the UK as petrol prices rise. Whilst fossil fuel companies stand to make a windfall of billions on the back of the price shock.

One of Reform's major donors, Jeremy Hoskings, has seen his fossil fuel and energy hedge fund investments rise by more than $25m since the war began in Iran.

This comes as Trump and Reform are using the oil price spike to call for our government to approve new UK oil and gas projects, like the controversial Rosebank oil field. Despite the fact that drilling in the North Sea would not make the UK more energy secure. If production began, Rosebank's oil would still go for export – like 80% of all UK oil.

Robin Wells, director of Fossil Free London said:

> *Right now we are seeing the horrors of Trump's war on Iran in the faces of dead schoolgirls and facing skyrocketing energy costs at home. And Big Oil cashes out big, with bumper profits.*

We're protesting today to say that for as long as the UK stays tied up in fossil fuels, we'll see more oil wars, more extreme weather deaths and more instability.

The UK needs to cut ties with Trump and Big Oil. We need to break free from this knot of violence.

That starts with scrapping new UK oil and gas and rejecting Rosebank. Until then, being tied into Big Oil's big disaster leaves us paying the price.

Featured image via Fossil Free London

■

FØSSIL FREE LONDON

PHOTOCALL: Body bags piled outside Equinor as Q1 profit spike expected from Iran war

When: 8.15am, Tuesday 5th May

Where: Equinor Offices, W2 6BD

Details: Activists from Fossil Free London will pile several life-sized body bags outside the offices of Rosebank co-owner Equinor, as one campaigner dressed as an oil executive stands on top of them.

The protest comes as the UK Government's decision on whether to approve or reject the Rosebank oil field approaches.

Equinor's quarterly profits are **also expected to jump** when announced on Wednesday 6th May, amidst the US-Iran war.

Photos can be used in coverage of Equinor's quarterly profit announcement.

(We will also stage a stunt ahead of Shell's Q1 profit results on Wednesday the 6th at 8:15 a.m. outside Shell's HQ, we will send a separate photocall tomorrow.)

For further information, to find us on the day, or to organise an interview please contact campaigner@fossilfreelondon.org, or 020 3886 2590.

Notes:

1. For further information, please contact Rosie, 020 3886 2590, **campaigner@fossilfreelondon.org**.

2. Fossil Free London is a grassroots climate group that protests Big Oil and campaigns for a London beyond fossil fuels. Instagram: **@fossilfreelondon** Twitter: **@fossilfreeldn**.

3. Photos from other Fossil Free London actions are available **here** and can be used in your journalism at any time without prior permission. Please credit Fossil Free London.

Protesters take aim at Aviva as shareholder meetings face disruption



The tie-up will create a significant force in the motor insurance sector (Alamy/PA)

Aviva's York offices were disrupted by protesters targeting the insurer's activities in the latest twist in a turbulent season for shareholder meetings.

It comes after NatWest's annual general meeting (AGM) was halted by activists accusing the bank of backtracking on climate commitments.

Campaign group Boycott Bloody Insurance claimed to be behind 12 people with shares in Aviva disrupting its AGM on Wednesday.

Several protesters shouting and chanting outside a boardroom were escorted or carried out of the building, delaying the start of the meeting.

The group claims Aviva underwrites or invests in companies profiting from immigration detention and surveillance, fossil fuel giants and weapons firms.

Andrew Taylor, a campaigner at Boycott Bloody Insurance said: "Aviva likes to present itself as an ethical business, but when you look at the companies it supports, that turns out to be a sham."

Aviva declined to comment on the protests.

Meanwhile, following a shareholder vote at the AGM, some 8.4% of votes were cast against the motion to approve Aviva's climate-related financial disclosures for 2025, while 5.5% of votes were against approving the pay policy for directors.

Aviva's chief executive Amanda Blanc took home a pay packet of £9.76 million last year.

The disruption comes a week after NatWest was forced to stop its AGM for about half-an-hour amid disruption during its chairman's opening speech.

Protesters were singing and making statements about NatWest's climate policies, while shareholder activists called on the banking group to address claims it had "reduced the ambition of its fossil fuel policy and climate targets".

Rick Haythornthwaite, NatWest's chairman, defended its policies and said the financing of oil and gas comprises 0.6% of the group's total lending.

Meanwhile, Barclays is expected to be targeted at its AGM in London on Thursday, with activist groups including the Palestine Solidarity Campaign and Campaign Against Arms Trade organising a protest outside the meeting.

■

Fossil Free London pours fake blood outside Shell offices as it ‘makes a killing’ from the Iran war



Fossil Free London campaigners protest outside Shell’s London headquarters against its giant profits from the Iran war [Pic: Fossil Free London]

FOSSIL Free London activists covered themselves in fake blood as they sat outside Shell’s London headquarters wrapped in a fuel pump today.

They erected a banner that read “BLOOD MONEY: No new oil & gas” amid expectations the fossil fuel giant will announce bumper quarterly profits today thanks to the Iran war.

Fossil Free London spokesperson Robin Wells said: “In these past few years, as our world becomes more unstable and the realities of climate breakdown set in, it’s never been clearer: Big Oil profits from, and locks in, mass death.

“And we’re feeling this so rawly right now. As we see thousands slaughtered in Iran and weep alongside those mothers who will never hold their children again, Shell is making a killing.”

More than 2,000 people have been killed by the US and Israel’s war in Iran, which has sent oil prices soaring due to a blockade on the Strait of Hormuz.

Barclays shareholder meeting targeted by Palestine and climate activists

Disruption broke out at the beginning of the shareholder meeting in Westminster on Thursday.



Protesters outside the Barclay's AGM in Westminster (Rebecca Speare-Cole/PA) (PA Wire)

Barclays faced a chaotic annual shareholder meeting as Palestine and climate activists repeatedly confronted the lender's board over its ties to Israel and fossil fuel financing.

The UK's biggest bank has come under fire in recent years for its links to Israeli government bonds and defence firms producing equipment used in attacks in the Gaza Strip, as well as companies driving large amounts of planet-heating emissions.

Disruption broke out at the beginning of the shareholder meeting in Westminster on Thursday, with groups of people being pulled out by security.

Chairman Nigel Higgins' opening remarks were repeatedly interrupted as protesters stood up holding Palestinian flags and shouting comments such as "Free, free Palestine" and "Everyone here is profiting from genocide".

Mr Higgins responded that the board had “heard your point” and would take questions on the topic during the meeting’s Q&A section.

A few minutes later, climate protesters rose from their seats and started singing: “Stop, in the name of love, before you break this Earth.”

One shouted: “This bank is financing the climate and nature crisis that we have to stop. Softly-softly, slowly-slowly is not good enough. You are endangering life on Earth.”

As the meeting moved to shareholder questions, the board was repeatedly quizzed about its recent fossil fuel financing.

Shareholders accused executives of failing to act with enough urgency over the climate crisis and criticised the board for leaving a key industry climate group, the Net Zero Banking Alliance.

A representative from ShareAction, which campaigns for responsible investment, called on the board to affirm that it will stick to its climate goals in light of its continued lending to oil and gas firms.

Mr Higgens said Barclays has “no intention of backtracking on its commitments” and remains on track to meet climate targets that it says are aligned with the UN Paris climate agreement to limit the worst impacts of global warming.

“I know this sometimes frustrates people who would like to see us move further, but we have got a big emphasis on consistency, not chopping, changing, going backwards, sideways,” he said.

On its oil and gas lending, Mr Higgins said the bank hit “quite demanding” targets for reducing financed emissions in the energy field and power sector early, although he also acknowledged that progress is “not going to be linear”.

In light of growing global energy demand and price shocks driven by the US-Israeli conflict with Iran, he said: “We feel we have to balance the planet with energy security, energy affordability and also ramping up our transition and sustainable financing activities.”

The board was also challenged about Barclays’ ties to the Israeli government after a UN report last year identified the bank as one of several firms implicated in profiting from a “genocidal economy” in Gaza.

Mr Higgins said the bank does not understand the “report”.

“We’ve read it and we don’t agree with the characterisation of the financial sector in it,” he said.

On its dealings with foreign governments, the chairman said the bank “tries to follow the policies set out by the British Government”, which continues to support Israel’s right to defend itself.

“These are deeply political and complicated questions and at one level, certainly, we take a steer from where our country’s Government is,” he said.

He added: “We do provide finance to a number of international defence companies who provide arms for the defence of this country, for the defence of Ukraine, and that is what the bank does.”

Asked if the bank will commit to supporting the sovereignty of the Palestinian people in any future dealings with Israel and its associated companies, Mr Higgins said: “The thing we all wish and pray for is peace in the region and reconciliation and an end to the appalling human cost on all sides of whichever frontiers you’re looking at.

“And all of the discussions around our policy, we shouldn’t lose sight of that fact – that is by far and away the most important thing to wish for.

“But I’m afraid I’m not going to go into our financing policies on specific clients.”

One shareholder shouted: “That’s not going to happen, Mr Chairman, unless commercial companies and banks stop financing Israel.”

City firms continue to face protests over their impact on people and planet, with NatWest’s AGM halted last week by activists accusing the bank of backtracking on climate commitments.

Wednesday also saw the London offices of insurance giant Aviva targeted by activists claiming the company underwrites or invests in companies profiting from immigration detention and surveillance, fossil fuel giants and weapons firms.

■

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW11

This is the exhibit marked "AJW11" in the witness statement of Alexander James Wright.

About us

Just Stop Oil was a nonviolent civil resistance group in the UK. In 2022 we started taking action to demand the UK Government stop licensing all new oil, gas and coal projects. We have won on this. **Civil resistance works.**

Just Stop Oil ended its street campaign in 2025, whilst we continue to support our action takers through the courts and in prison.



Two Just Stop Oil supporters found guilty for Heathrow paint spraying following retrial

Court & Prison, Press / May 14, 2026

Two Just Stop Oil Supporters who sprayed Heathrow departure boards with orange paint during the Oil Kills, international uprising to end fossil fuels in July 2024 have been found guilty in a retrial after the jury in an earlier trial failed to reach a majority decision. [1]

Phoebe Plummer and Jane Touil were appearing before Her Honour Judge Duncan at Isleworth Crown Court for the second time accused of criminal damage over £5,000 for their action on 30 July 2024 to demand a fossil fuel treaty to end oil and gas by 2030. [2] [3]

Following the verdict Jane Touil said:

"Since I took action, global fossil fuel use and emissions have continued to rise. More than ever, we need a global fossil fuel treaty to help governments rapidly phase out fossil fuels."

"What we do at this moment in history matters. But there is a difference between laws and morality. The courts apply the law made by powerful people. Morals come from within. It is our morals that give us our conscience. I have always tried to live according to my conscience."

Phoebe Plummer said:

"The climate crisis is the greatest injustice that humanity has ever faced. We should all consider what to do at this time. No individual caused this crisis and no one is solely responsible for stopping it. But we can choose what we do to alleviate suffering. I feel compelled to act to be a responsible citizen, a loving aunt and a good person. It compels me to hope for a better future and one where my nephew grows up. I didn't think the action would change government policy. But non violent civil resistance is a necessary part of tackling the climate crisis and I'm grateful and proud to have been part of that. "

Phoebe was remanded for 58 days and Jane for 14 days following the 2024 action in which the pair used fire extinguishers to spray diluted water-based paint in Terminal 5 including at the departure boards. The Crown alleged that the action caused £8,000 worth of damages and that three of the display screens needed to be replaced. [4]

At trial, Judge Duncan ruled out several legal defences for the action including those of 'reasonable excuse' under Articles 10 and 11 of the ECHR, 'necessity' and 'self defence' on the grounds that the threat from climate change was not proximate enough and the actions too far removed from the threat. The defendants were allowed to argue belief in consent : that they honestly believed the owners of Terminal 5 would have consented to the damage if they knew of its circumstances. However, evidence of the relevant circumstances was to be limited to the fact that it was a climate protest with all evidence about the scale and urgency of the climate crisis ruled *'irrelevant and therefore inadmissible'*.

In giving evidence, Jane Touil said:

"I genuinely and sincerely believed that if the shareholders [of Heathrow] had a full understanding of the situation we are in they would have given their consent to our action.

"Most people believe there is something that is wrong with climate but not many people have access to the full situation because the fossil fuel industry has used their immense wealth to ensure that governments do not act and it is not reported in the mainstream media.

"So I don't know if shareholders have a full understanding, but I know that if they did, they would be doing all in their power to stop fossil fuels because there will be no business as usual, no functioning society,

In her evidence Phoebe Plummer said:

"I want to make it very clear that this was not a protest against Heathrow, or anyone flying through Heathrow that day. It's true that the aviation industry is especially harmful to the climate in terms of emissions, though it is a small number of frequent fliers and private jet users who cause the vast majority of this harm, not families who save up for a holiday once a year.

"But this wasn't about getting people to stop flying…I made this individual change to live in line with my values, but honestly I know that it's pretty inconsequential. Even if we all woke up tomorrow and stopped flying and went vegan, it would be like mopping up a spill from an overflowing bath whilst leaving the tap on. All individual changes are like this when we are facing a systemic issue. If fossil fuels are extracted from the ground, then they will all be burnt, even if it's not on a flight that you're on. We need systemic change, that has always been Just Stop Oil's demand."

"My intention was not to cause damage. My intention was to take part in an act of nonviolent civil resistance, raising a serious alarm bell to the catastrophic future in store for us if we persist in our addiction to fossil fuels."

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.

ENDS

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW12

This is the exhibit marked "AJW12" in the witness statement of Alexander James Wright.


JUST STOP OIL
Donate
News & Press
Law
!! NEW PROJECT ALERT !!
The rich are killing us. To stop them and fix our broken country we need to...
Take back POWER
Join us at: takebackpower.net

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

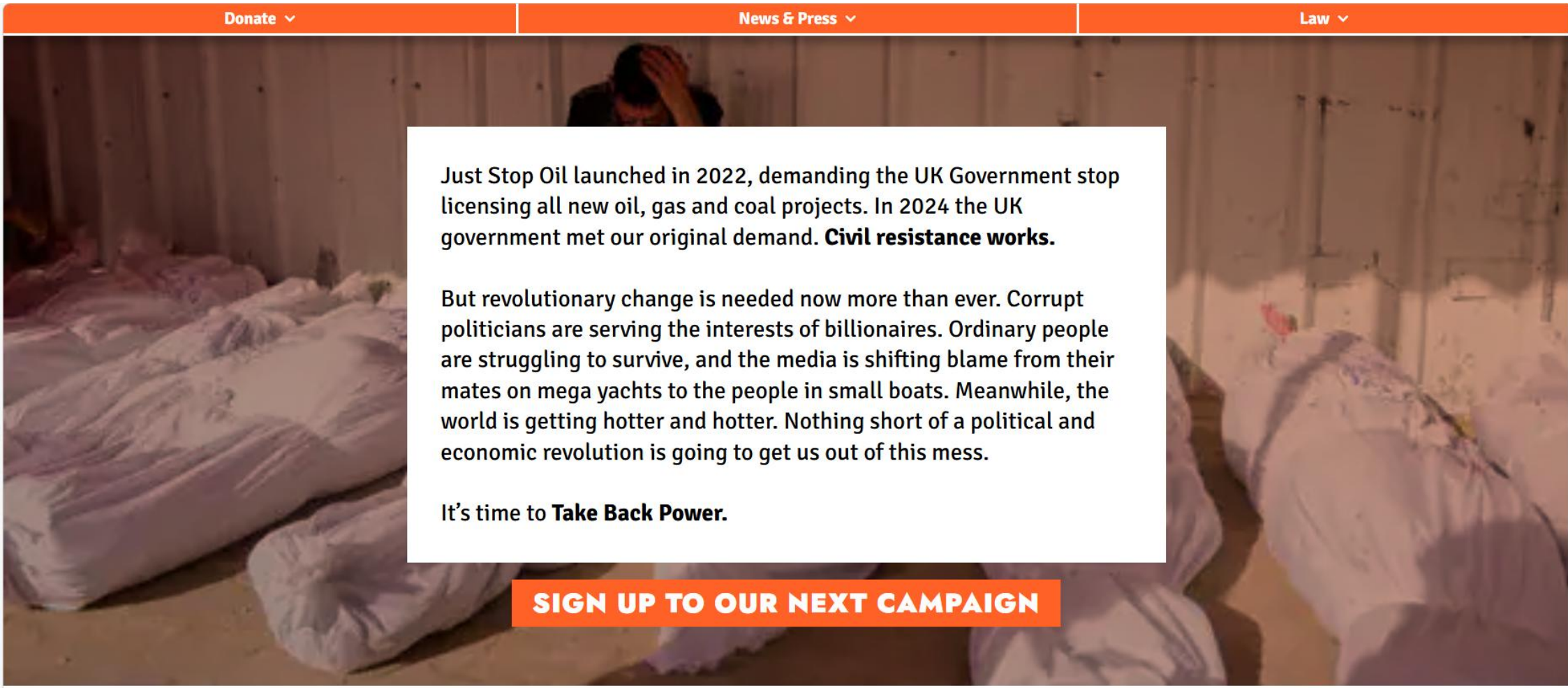
- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW13

This is the exhibit marked "AJW13" in the witness statement of Alexander James Wright.



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.**

SIGN UP TO OUR NEXT CAMPAIGN

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW14

This is the exhibit marked "AJW14" in the witness statement of Alexander James Wright.

just.stopoil and defendourjuries



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just.stopoil 🚨 SLOW MARCHERS FOUND NOT GUILTY BY A JURY... more

17 April

17 April

just.stopoil



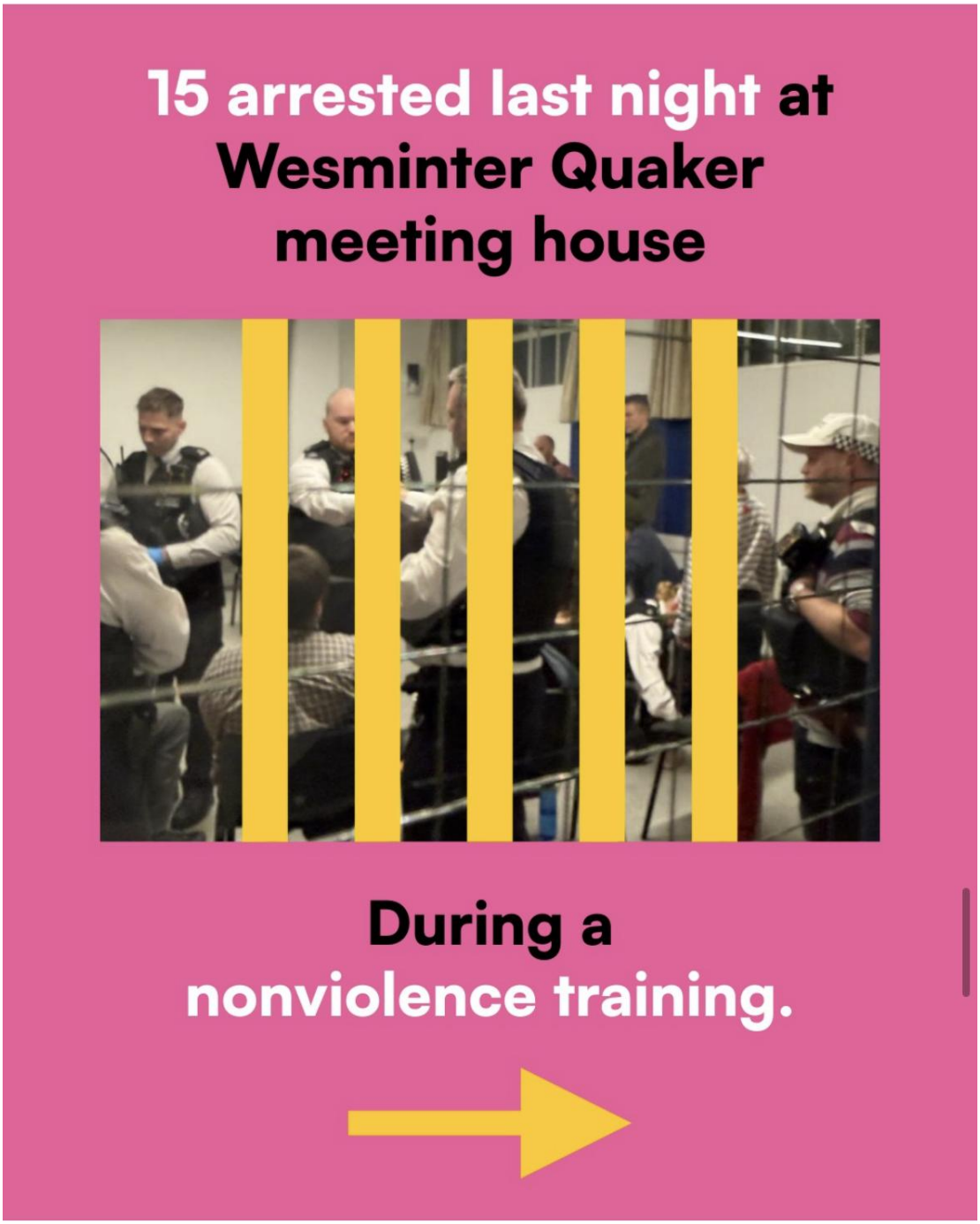
341 19 6 8

just.stopoil 🚨 BREAKING: JANE IS FREE!

Jane Touil, 60, has just been released from prison... more

7 April

takeback.power and 4 others



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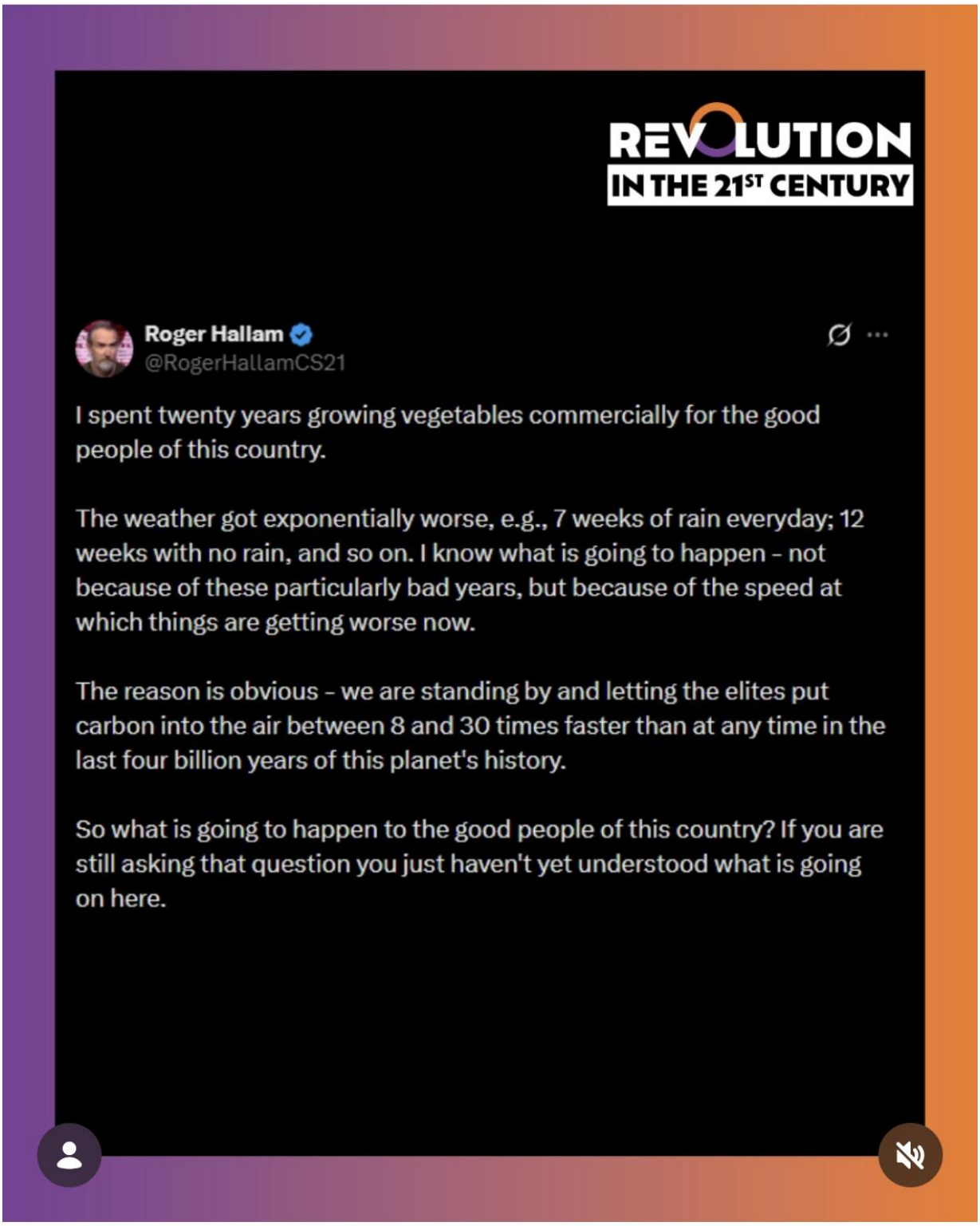
takeback.power Imagine being so deep in the pockets of CEOs and billionaires that you'd go to a Quaker Meeting House and arrest everyone at a nonviolence training.

@metpolice_uk really demonstrating the state's fear of peaceful resistance.

6 March

rogerhallamcs21 and 3 others
Wales, UK



298 18 28 31

rogerhallamcs21 With these numbers it's clear that revolution is inevitable. Sign up for it at rev21.earth.

3 March



69 3 2 3

takeback.power Another Just Stop Oil jury trial has just been adjourned to 2027.

Fact 1. All Section 7 jury trials bar one for nonviolent civil resistance have been adjourned in the 2 years since the Public Order Act came into law.

Fact 2. Lammy is planning to try and rush through scrapping jury trials.

There is no justice in our "Justice" Secretary.

23 February

Just Stop Oil
11.9K posts

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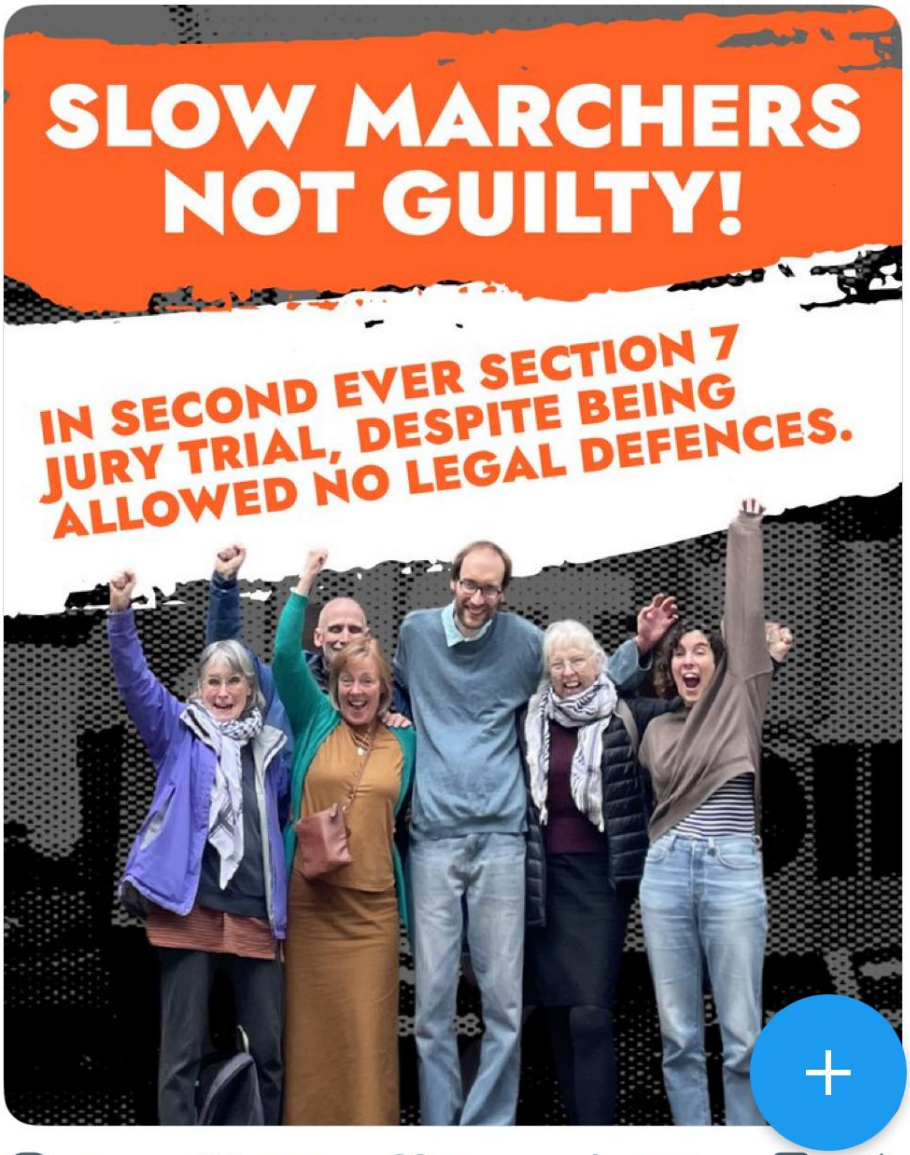
Posts Replies Highlights Videos Photos

Just Stop Oil @JustSt... · 17/04/2026

🚨 SLOW MARCHERS FOUND NOT GUILTY BY A JURY

Hey @SuellaBraverman, turns out juries don't like when you invent anti-protest laws designed to imprison people for 12 months just for marching.

Six Just Stop Oil supporters were a Show more



42 568 1K 35K

Just Stop Oil
11.9K posts

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Just Stop Oil @JustSt... · 07/04/2026

🚨 BREAKING: JANE IS FREE!

Jane Touil, 60, has just been released from prison after serving 4 months of a 20 month sentence for climbing a gantry over the M25 in 2022 to demand an end to new oil and gas. She is partially sighted.

She will serve the rest of her sente Show more



21 105 294 5.5K

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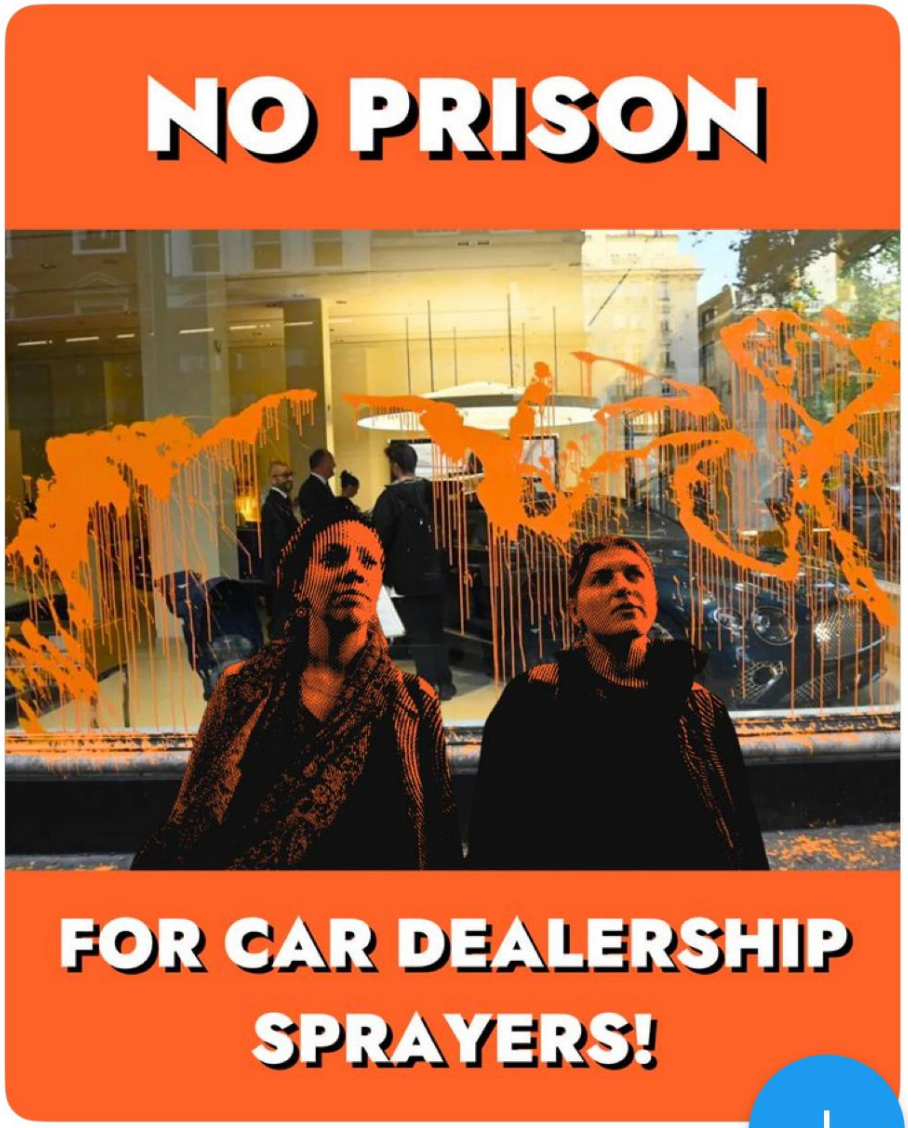
Posts Replies Highlights Videos Photos

Just Stop Oil @JustSt... · 20/02/2026

🚨 BREAKING: NO PRISON FOR CAR DEALERSHIP SPRAYERS

In October 2022, Carmen and Emma sprayed orange paint over high end car dealerships including HR Owen, Jack Barclay and Ferrari Mayfair, demanding an end to new oil and gas licences Show more



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Just Stop Oil
17 Apr ·

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Southwark Crown Court today, two and a half years after slow marching on Waterloo Bridge to demand an end to new oil and gas licensing.

On 8th November 2023, Sheila Shatford, Julia Mercer, David Kilroy, Geraldine James, Rosalind Bird and Gregory Sculthorpe were among approximately 50 supporters who joined a slow march around the IMAX roundabout before heading north over Waterloo Bridge. They were arrested and charged with Section 7 of the Public Order Act 2023: interference with key national infrastructure: an offence which was used for the first time only two days beforehand, and which carries a maximum penalty of 12 months imprisonment, an unlimited fine, or both.

The six appeared before Judge Hiddleston at Southwark Crown Court this week in a trial which had been restarted after one of the original jury fell ill. The jury delivered their

During the five day trial, the Judge denied the defendants all legal defences including reasonable excuse and necessity, and ruled that agreed facts on climate were "irrelevent". The defendants were, however, given around 20 minutes each to talk about their motivations for taking action.

The jury were asked to consider whether the defendents had caused a significant delay to other road users, and if so whether that was their intention or they were reckless as to whether that would have been the result.

The police produced a compilation of video evidence showing the march which demonstrated some traffic buildup, but no evidence of a normal traffic flow at that location. Laura Stockdale, acting for Greg Sculthorpe, questioned whether the jury could be sure that this buildup was more than would normally occur on a weekday in central London.

been less if the police had let the march continue to the other end of the Bridge and if they had not themselves closed the Southbound carriageway. DI Keven Pender for the Metropolitan Police responded that they could not be sure what the marchers were planning to do.

The defendants each emphasised their desire to draw attention to the climate crisis and the care and careful planning that was involved in undertaking a march. All denied that there was any intention to cause anything more than minor slowing of traffic.

In her defence evidence, Sheila Shatford spoke movingly of what inspired her to take action, including a childhood teacher whose family had been affected by the Aberfan disaster in which 116 children were killed. She said: "Only later did I understand that the slag heap belonged to the National Coal Board, and that warnings were given before the disaster, but

She went on to recount how she had learned about the climate emergency and said: "I realised that it's always the poorest and most vulnerable that are most affected and have the smallest voice. I read and found out the climate emergency was real - there is overwhelming evidence that it's happening now, and very soon we won't be able to stop it."

The 2023 Public Order Act was introduced specifically to target climate protest, and named groups such as Extinction Rebellion, Just Stop Oil and Insulate Britain as the reason for its introduction. Although hundreds of Just Stop Oil supporters have been charged with the Section 7 offence and are awaiting trial, as a result of the backlog in courts, this was only the second case to be heard since May 2024.

The first person to be convicted of the offence was Stephen Gingell who was jailed for 6 months after pleading guilty in December 2023.

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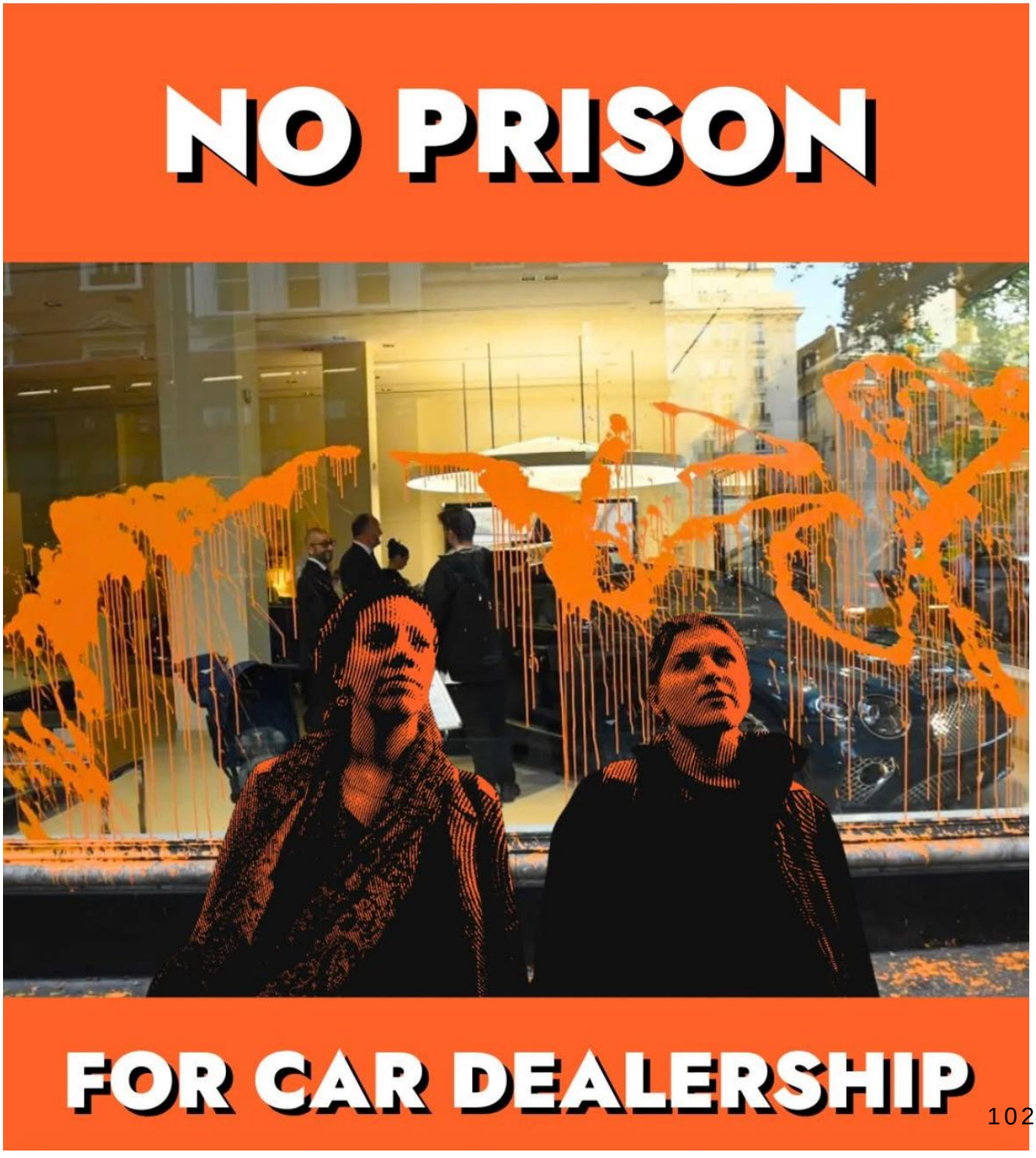

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW15

This is the exhibit marked "AJW15" in the witness statement of Alexander James Wright.

Taking back power or taking the mickey? The activists ‘liberating’ food from big stores

A new UK civil resistance group has called for ‘mass shoplifting’ to focus attention on inequality, but recent stunts have led to arrests



Eve Middleton was sitting on a picnic blanket in a park, sharing out vegan biscuits with six fellow activists, when she saw a squad of police bearing down on them. About 30 officers, she said, surrounded the seven young people, and one officer told them: “Don’t run or you’ll be cuffed.”

Another officer focused on gathering evidence. “Whose Oreos are these?” they asked, seizing the biscuits.

“It was pretty farcical, but it’s still frightening when you see that amount of officers running towards you. It’s pretty scary,” said student Bridie Leggatt, another of the seven.

The seven activists had gathered for a “nonviolence training event” – meeting in the park to enjoy the sunny weather.

Leggatt, 22, and Middleton, 25, were among 13 people arrested last weekend in Salford and London as part of a national police crackdown on a new civil resistance group called Take Back Power.

A further 15 arrests had been made in March when police raided a “nonviolence training” event, this time at the Grade II-listed Quaker House in Westminster.

They were all held on suspicion of conspiracy to commit theft, police said, linked to Take Back Power’s campaign of “mass shoplifting” in supermarkets across Britain in a protest against inequality.

On TikTok, the group’s videos show activists of all ages “liberating” rice, pasta, beans, nappies, stock cubes and tinned fruit from supermarkets including Cornwall, London and Manchester.

They pile the goods into cardboard boxes branded with the message: “These things are going to those who need them.” The items are then distributed at local food banks – if they manage to get past security.

Even by today's standards of shoplifting, when supermarket thefts have reached record highs, the mass looting is quite brazen.

Steph Parker, an assistant chief constable at Greater Manchester police, said forces would take "robust action to disrupt this type of organised criminality and it will not be tolerated".

Middleton and her six comrades were held in custody for 24 hours before being released on Monday. For Middleton, like many of the activists, this is not her first encounter with the law.

Many of those involved with the group 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. Neither Middleton or Leggatt wanted to say how many times they had been arrested as they feared a telling off from their parents.

Take Back Power announced itself in December when activists threw custard and apple crumble at a case containing the crown jewels at the Tower of London.



Eight people were charged with criminal damage over the stunts, with four due to appear before Westminster magistrates court on Monday. The group said a total of 50 people had been arrested since December, with the majority detained while taking part in "nonviolence training" events.

On its website, activists are invited to join upcoming action in London "targeting the luxury lifestyle of the super-rich" by "occupying where they play and shop".

A spokesperson for Take Back Power, who would only give his name as James due to the risk of arrest, said the group planned further headline-grabbing stunts this year with the aim of focusing attention on Britain's deepening inequality.

James said the organisation, which wants to see higher taxes levied on the rich and a legally binding citizens' assembly, had no leader "as such". It has raised more than £65,000

in donations in the past four months, according to a fundraising page.

Another of those arrested last weekend, who would only give his name as Mark, said mass shoplifting would have "no real effect" on supermarkets who make billions of pounds in profit.

"Supermarkets are profiting off other people's misery and we can't put up with that," said Middleton, pointing out that Tesco's chief executive, Ken Murphy, was paid £9.2m last year, about 400 times that of the shop's typical worker.

What about the effect on low-paid staff? Will they not risk losing their jobs if mass shoplifting has an effect on company profits?

"It shouldn't be staff that get cut," said Mark, 44, who works in education. "What should get cut are the obscene profits and salaries of the chief executives."

The vegan picnic raided by police last weekend was in Salford's Peel Park – named after Sir Robert Peel, the founder of modern law enforcement whose philosophy of "policing by consent" is a guiding principle of forces today, recognising that those in uniform operate on the basis of public trust rather than fear or force.



Yet the arrests of activists at a training event – rather than for a specific act – appears to run counter to that principle, said Middleton.

Parliament's joint committee on human rights has condemned legislative changes in recent years that it said (pdf) have had "a chilling effect" on the right to protest in England and Wales.

Middleton said the arrests on suspicion of being involved in a conspiracy was part of a wider "repression" of civil resistance in Britain.

"Other groups were able to take part in training without everyone getting arrested," she said. "For doing not as much, the risk of prison is a lot higher."

James, the Take Back Power spokesperson, said the group planned to build up its action with the aim of pushing inequality to the top of the agenda by the next general election, which has to be held by August 2029.

Middleton believes the police crackdown is a sign that the authorities are scared.

“They can see that Take Back Power does speak to a lot of this country’s people [who are] fed up with inequality. They are scared of what it could become.”
■

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW16

This is the exhibit marked "AJW16" in the witness statement of Alexander James Wright.

Four taken into custard-y as Take Back Power ‘crumble and custard’ the Crown Jewels



Two supporters of Take Back Power have smothered dessert over the crown jewels. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen’s assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 09:50 this morning, two Take Back Power supporters covered the glass containing the crown jewels in custard and apple crumble. They then held a sign which read ‘DEMOCRACY HAS CRUMBLED- TAX THE RICH’. By around 10:30, the two action takers and two others had been taken into custard-y by police.

Today’s action comes as all donations to Take Back Power will be doubled until midnight on Sunday the 7th December! You can donate and have your donation doubled here. [2]

A Take Back Power spokesperson said:

"Since 2011, the poorest 10% of households have paid a combined tax rate of 44% on their income and wealth gains, while the richest paid 22%. Our political class, be it this government, Reform or Tory, serve the super-rich; they do not care about working people. That's why we must demand real democracy, with ordinary people at the heart of decision making, through a citizen-led assembly that has the power to tax the rich." [3]

One of those taking action today is Miriam Cranch, 21, a retail worker from Leeds, who said:

"Britain is broken because the super rich are pocketing billions, whilst working people struggle to get by."

"This wealth inequality is leading us towards civil unrest, and it doesn't have to be this way. Billionaires should not pay a lower tax rate on wealth they generate doing nothing, than those of us working jobs. It's time ordinary people get a say on how to tax wealth with a permanent House of the People."

Also taking action today is Zahra Ali, 19, a student from London, who said:

"Our country is crumbling before our eyes! We have homeless people dying on the very streets that King Charles passed on his way to the coronation, whilst there are more empty homes than unhoused people in this country."

"It's time the ultra rich pay their fair share. We demand a permanent House of the People. It's time to take back power, tax the rich and fix Britain! Join us at takebackpower.net."

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net.

ENDS

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW17

This is the exhibit marked "AJW17" in the witness statement of Alexander James Wright.

~~Wed, Jul 22, 2026, 6:00 pm~~ 8:00 pm	~~Welcome Event~~	~~London, E1~~ 5QJ	~~Register~~

Follow us on social media.

—

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, 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!**

—

Contact us
General: info@takebackpower.net
Press: press@takebackpower.net
Fundraising: giving@takebackpower.net

Get the newsletter

First name *

Email *

Postcode

Country

-

I agree to the privacy policy *

Register

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW18

This is the exhibit marked "AJW18" in the witness statement of Alexander James Wright.

What is Take Back Power and what does it want?



– 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.

+ What is Take Back Power's demand?

+ What is the House of the People?

+ What would the House of the People do?

+ Has an institution like this existed before?

+ Don't the super-rich already pay too much tax?

+ How rich are we talking about here?

+ How bad is inequality in the UK?

+ What sort of tax would you like to see?

+ Even if you tax the rich it won't be enough to fix Britain will it?

+ How would you spend the money raised?

+ Why does Take Back Power engage in disruptive direct action?

+ How is Take Back Power funded?

+ How can I get involved?

What is Take Back Power and what does it want?



+ What is Take Back Power?
+ What is Take Back Power's demand?
+ What is the House of the People?
+ What would the House of the People do?
+ Has an institution like this existed before?
+ Don't the super-rich already pay too much tax?
+ How rich are we talking about here?
+ How bad is inequality in the UK?
+ What sort of tax would you like to see?
+ Even if you tax the rich it won't be enough to fix Britain will it?
+ How would you spend the money raised?
– 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. You can read more about how this works here.

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW19

This is the exhibit marked "AJW19" in the witness statement of Alexander James Wright.

(https://takebackpower.net)

‘Inequality is shit’ — Take Back Power deliver crappy Christmas for the Ritz

December 3, 2025(https://takebackpower.net/2025/12/03/)



Three supporters of Take Back Power have delivered a pile of shit to the Ritz. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen’s assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 12:05 today, three Take Back Power supporters deposited a pile of manure below the Christmas tree at the iconic luxury hotel. The three were quickly removed from the lobby and then held signs outside the entrance which read: ‘INEQUALITY IS SHIT’ & ‘TAX THE RICH’.

A Take Back Power spokesperson said:

"The super-rich have more than doubled their wealth since the pandemic, while this Christmas, a third of UK children suffer and grow up in poverty. It's time ordinary people – those most affected by inequality, get a say in deciding how to tax wealth through the means of a legally binding citizen's assembly- a House of the People." [2][3]

One of those taking action today, Ellen Redwood-Brown, 23, an NHS worker, said:

"The billionaires, corporations, and corrupt politicians running Britain don't care about us. While working in the NHS I've seen people dying because they couldn't get appointments whilst doctors are working 15 hour shifts."

"The UK has 156 billionaires. We could take away 75% of that wealth to fix Britain and we'd still have 156 billionaires. We must let ordinary people decide how to tax the rich." [4]





Also taking action today is Tom Barber, 65, a former doctor, journalist and community worker from Nottingham, who said:

"Power is concentrated in the hands of a small group of obscenely wealthy and ruthless individuals. They are hell-bent on enriching themselves, forcing the gap between the haves and the have-nots ever wider."

"Everyday people must Take Back Power, compelling our government to create a permanent citizens' assembly- a House of the People. Only then can we start making decisions for everyone's benefit- taxing the rich, creating a fairer society and restoring our faith in our democracy."

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

(https://takebackpower.net)

Four taken into custard-y as Take Back Power ‘crumble and custard’ the Crown Jewels

December 6, 2025(https://takebackpower.net/2025/12/06/)



Two supporters of Take Back Power have smothered dessert over the crown jewels. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen’s assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 09:50 this morning, two Take Back Power supporters covered the glass containing the crown jewels in custard and apple crumble. They then held a sign which read ‘DEMOCRACY HAS CRUMBLED- TAX THE RICH’. By around 10:30, the two action takers and two others had been taken into custard-y by police.

Today's action comes as all donations to Take Back Power will be doubled until midnight on Sunday the 7th December! You can donate and have your donation doubled here (https://donorfed.org/project/take-back-power?utm_source=tbpnet&utm_medium=websitet&utm_content=tbphome&utm_term=doubletop) (https://takebackpower.net) [2]

A Take Back Power spokesperson said:

"Since 2011, the poorest 10% of households have paid a combined tax rate of 44% on their income and wealth gains, while the richest paid 22%. Our political class, be it this government, Reform or Tory, serve the super-rich; they do not care about working people. That's why we must demand real democracy, with ordinary people at the heart of decision making, through a citizen-led assembly that has the power to tax the rich." [3]

One of those taking action today is Miriam Cranch, 21, a retail worker from Leeds, who said:

"Britain is broken because the super rich are pocketing billions, whilst working people struggle to get by."

"This wealth inequality is leading us towards civil unrest, and it doesn't have to be this way. Billionaires should not pay a lower tax rate on wealth they generate doing nothing, than those of us working jobs. It's time ordinary people get a say on how to tax wealth with a permanent House of the People."

Also taking action today is Zahra Ali, 19, a student from London, who said:

"Our country is crumbling before our eyes! We have homeless people dying on the very streets that King Charles passed on his way to the coronation, whilst there are more empty homes than unhoused people in this country."

"It's time the ultra rich pay their fair share. We demand a permanent House of the People. It's time to take back power, tax the rich and fix Britain! Join us at takebackpower.net (https://takebackpower.net)."

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ENDS

(https://takebackpower.net)

Take Back Power supporters call on Starmer to cut the corruption and resign by ‘locking-on’ at Parliament

February 6, 2026(https://takebackpower.net/2026/02/06/)



Two young people have called on Keir Starmer to cut out corruption and resign by ‘locking-on’ outside Parliament. They are supporters of Take Back Power, a nonviolent civil-resistance group, demanding that the UK government establish a ‘House of the People’- a permanent citizen-led assembly with the power to tax extreme wealth. [1]

At 9am this morning, two young people carrying a giant Keir Starmer papier mache head locked themselves in front of Carriage Gate, blocking access to Parliament. They could be seen holding placards which read “Cut the Corruption”. By around 10am police arrived at the scene and had cut through the papier mache head.

A spokesperson for Take Back Power said:

"We're calling on Keir Starmer to resign. While Lord Mandelson is gone, the system that protected and empowered him remains. It's time to cut out the corruption at the heart of our democracy. While corporations and the super rich are splashing their cash to buy access to ministers and seats in the House of Lords, ordinary people are struggling to afford basic necessities."

"We need a radical overhaul so that democracy works for all of us, not just the privileged few. We have politicians in the pockets of billionaire pedophiles, they don't work for us. We need ordinary people in charge through a House of the People."

One of those taking action today is Alice Jones, 20, a student from Manchester, who said:

"It is absurd that we live in a country where 156 billionaires hoard wealth, splashing out on private jets, whilst ordinary people have to choose between heating their homes, or feeding their children; all while our country quickly descends into fascism."

"The politicians in our country are failing us. Ordinary people are being left to survive with the scraps: a crumbling NHS, extortionate food prices, and ever rising bills. The UK needs a permanent House of the People. It's time to take back power, tax the rich and fix Britain! Join us at takebackpower.net (https://takebackpower.net)."





(Left image credit to Jamie Lowe. Right image and main image credit to Will Colebourne.)

Also taking action is Bridie Leggatt, 22, who is also a student from Manchester, who said:

"Spiralling wealth inequality is leading us to societal collapse. Our country is the sixth richest nation and yet it is home to 4 million children living in poverty. Our political system doesn't function fairly. We need ordinary people in the decision making seats deciding how to fix this; not corrupt politicians in the pockets of the super rich."

“There IS a solution to inequality, but our government simply won’t do what’s necessary. We cannot let political parties use scapegoated minorities to distract us from what is needed: a tax on the super rich.”

(https://takebackpower.net/)





(Image credit to Will Colebourne.)

Today’s action comes just days after the MET police began criminal investigations into Peter Mandelson, Starmer’s former ambassador to the US, over allegations that he passed market-sensitive information to the pedophile financier Jeffrey Epstein.

New allegations from recently released Epstein files also allege that Peter Mandelson’s husband accepted money from Jeffrey Epstein after his prison sentence over child sexual offences. [2]

But the corruption doesn’t end there, recent research by the Guardian showed that almost a third (266 out of 800) members of the House of Lords have given donations to political parties, some 115 of them before they were given peerages. [3]

Recent media reports have revealed that Labour government ministers have met with the arms industry, banks and big oil hundreds of times, while half the cabinet have taken cash from pro-Israel lobbyists. The Party even offered sponsorship deals for £55,000 to allow businesses to host lunches for ministers at the Labour conference. [4][5][6]

Meanwhile, inequality is spiralling out of control. Student nurses say they are sleeping in their cars, going to food banks and relying on lecturers to buy them food, while nearly half of Brits would struggle to pay for basic necessities if they lost their jobs. Given this, it is not surprising that faith in political institutions has collapsed, with 87 per cent of Britons across all parties having either not very much trust in politicians or none at all. [7][8][9]

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen’s assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Police arrest 15 Take Back Power supporters at a nonviolence training event

March 5, 2026(https://takebackpower.net/2026/03/05/)



15 Take Back Power supporters were arrested during a nonviolence training this evening being held in the Westminster Quaker Meeting House. Take Back Power is a nonviolent campaign demanding a tax on extreme wealth, to be decided by a 'House of the People.' [1]

At around 18:35 a number of police officers forced entry into the Westminster Quakers meeting house. They proceeded to arrest 15 people on suspicion of conspiracy to commit theft. Two of those arrested were acting as legal observers. During the raid an ambulance had to be called as one person

suffered a panic attack after being arrested. Those arrested were sent to Brixton and Walworth police stations where one person was subsequently bailed. 14 remain in custody. [2]

(https://takebackpower.net)

A Take Back Power spokesperson said:

“The police arrested fifteen ordinary people in a place of worship for discussing nonviolent civil disobedience. This draconian overreach shows what the state is willing to do to protect corporate profits and billionaires, while ordinary people struggle to put food on the table.

The state is scared of civil disobedience because it works. But when the super-rich have captured our politics, nonviolent civil disobedience is the only choice we have to take back our power. Now more than ever, we need everyone to join us: sign up at takebackpower.net.”

In their statement, the MET police referenced last year’s unprecedented raid on Westminster Quakers and the arrests of Youth Demand supporters meeting about the genocide in Gaza, which drew widespread condemnation from faith groups. One of the people arrested this evening had also been previously arrested during last year’s raid on Westminster Quakers. [3]

ENDS

(https://takebackpower.net)

Take Back Power supporters redistribute food from supermarkets to those most in need

March 14, 2026(https://takebackpower.net/2026/03/14/)



Take Back Power supporters have been redistributing food from supermarkets to local foodbanks across the country this morning. Take Back Power is a nonviolent civil-resistance group, demanding that the UK government establish a ‘House of the People’- a permanent citizen-led assembly with the power to tax extreme wealth. [1]

From around 8:30 this morning, teams across four UK cities- Manchester, London, Exeter and Truro, entered supermarkets and began putting food and necessities into boxes emblazoned with ‘These things are going to those that need them’. The Take Back Power supporters left the shops without paying for the produce and then redistributed these items to local food-bank drop off points.

In Exeter, a team of five supporters took five boxes of produce from Morrison’s supermarket in Prince Charles Road, however were stopped by security who took away two of five boxes. The remaining three boxes were successfully

liberated and taken to a local food-bank drop off point.

From 9am, in London, on liberating boxes of food, two supporters set up a stall outside Sainsburys in the Lewisham centre, to give the food back to the local community. Security staff arrived by around 9:40 and police arrived onsite at around 9:50. No arrests have been made as of yet and the supporters left at around 10am.

In Manchester, three action takers filled boxes with food from Tesco, on Pars Wood Lane in Didsbury. All three left the store without incident and redistributed the food to a food-bank drop off point at a local Aldi.

In Truro, two supporters loaded boxes from the Sainsburys on Treyew Rd and left the produce at the foodbank drop-off point in the same store.

A spokesperson for Take Back Power said:

"It is sickening that 6.5 million people in the UK are forced to turn to food banks every year and a third of children under five are living in homes where there is insufficient access to nutritious food. This is because our country is in crisis, with billionaires hoarding wealth, whilst ordinary people suffer. We need to tax extreme wealth to fix Britain, and we need ordinary people to decide how."







(Credit for image on the left and far right to The Canary)

One of those taking action today is Eve Middleton 25, from Manchester, who said:

"I refuse to sit by while billionaires hoard wealth and capture our democracy. We can all see the impacts of inequality on our streets, in our schools and hospitals and in our own homes. Taxing the super rich is the first simple step to solving these crises. Yet our political system will not deliver a wealth tax, as it is rigged to

benefit parasitic billionaires instead of the masses. It's time for ordinary people to be put at the heart of decision making, through a House of the People with powers to tax the rich and fix Britain."
(https://takebackpower.net)



(Credit for image to The Canary)

Also taking action is Ruth Cook, 74, a company director from Somerset, who said:

"I'm taking this action and risking arrest because we have a terrible situation in this country. Families are struggling and children are going hungry, while the profits some companies make are obscene. The answer is to tax the super-rich. I'm taking this food and delivering it to a food bank collection point because we need to do something about this. We need to tax the super rich and give ordinary people a say in how our taxes are spent. Join us at takebackpower.net (https://takebackpower.net)."





Today's action comes in the wake of the raid of a Quakers meeting house and the arrest of 15 people during a nonviolence training last week. One other was arrested at their home on Thursday and the houses of seven supporters have been raided by police in connection with these actions so far. (https://takebackpower.net)

This occurs as the UK remains in crisis. Last year, 14 million people in the UK faced the prospect of going hungry due to a lack of money. Whilst in 2024, 6.5 million people turned to food banks. [2]

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Seven arrested at Nonviolence training event as Take Back Power supporters homes raided

April 19, 2026(https://takebackpower.net/2026/04/19/)



Seven people have been arrested at a nonviolence training event held in London. The training was held by Take Back Power, a nonviolent campaign demanding a tax on extreme wealth, to be decided by a 'House of the People.' [1]

At around 12:30 yesterday, dozens of officers raided Millman Street Community Centre in London. Officers arrived in three vans, arresting six people under suspicion of 'conspiracy to commit theft.' One of those arrested was an undercover Daily Mail journalist.

At around 15:20 on Saturday the home of Take Back Power supporter was also raided. The supporter wasn't home and on learning there was a warrant for their arrest they handed themselves in. The police subsequently raided their home for a second time at around 2am this morning.

This weekend's raids occur as Take Back Power supporters joined a counter demonstration in Manchester yesterday, opposing Britain First, a far-right demonstration which was marching in the city. Groups opposing fascist demonstrators were kettled, beaten with trunchons and pepper-sprayed by police.

A Take Back Power spokesperson said:

"Once again the police are raiding homes and community centres, arresting people for simply learning about nonviolence. Meanwhile, police protect fascists marching in Manchester and kettle and beat counter-protestors instead. Such is the state of civil liberties in the UK in 2026. The government and police care more about protecting the interests of corporations and billionaires than protecting the people of this country. We've got to make politics work for ordinary people. We need a House of the People with powers to tax the billionaires destroying this country. If you want to help us make it happen sign up at takebackpower.net (https://takebackpower.net)."





On Saturday, police also attended and shut down a nonviolence training being held in Falmouth, no arrests were made, however the event was cancelled.

Today's raids continue the escalating repression being imposed on nonviolent campaigns. Police have so far shut down four nonviolence trainings held by Take Back Power, in some instances raiding places of worship.

These raids echo the widely unpopular and unprecedented raid in 2025 on Westminster Quakers where Youth Demand supporters were meeting to discuss the genocide in Gaza, which drew widespread condemnation from faith groups. [2]

ENDS

(https://takebackpower.net)

“Nigel for Sale”- Take Back Power takes action at Sotheby’s

April 27, 2026(https://takebackpower.net/2026/04/27/)



Two Take Back Power supporters have taken action at Sotheby’s auction house. Take Back Power is a nonviolent campaign demanding a tax on extreme wealth, to be decided by a ‘House of the People.’ [1]

At around 11:15 this morning, two Take Back Power supporters covered a painting at Sotheby’s Orientalist art pre-auction exhibition, with a picture of Nigel Farage’s face. The image read *“Nigel for sale: £100,000- bought by Sotheby’s”*. The painting covered is King Wilhelm I’s Arabian Stallion ‘Tursi’ by Friedrich Nerly, which is expected to sell for between £80,000- £120,000.

By around 11:35 the action takers had been removed from the building by security, however police didn’t arrive on the scene. At around mid-day, the action takers attempted to hand themselves in at Charing Cross police station. Thus far, no arrests have been made.

Sotheby's describes itself as *the 'world's premier destination for art and luxury'.* Best known for its fine art auctions, it also has a luxury real estate company — Sotheby's realty which has donated £100,000 to Reform. [2] (https://takebackpower.net)

A Take Back Power spokesperson said:

"Reform claims to be on the side of working people. If that were true, why would the 'world's premier destination for art and luxury', be giving them a donation of £100,000 in exchange for yet more tax breaks on the super rich if they get into power?"

"Reform is another party of the same corrupt corporations and super-rich who are destroying our country, putting the burden of fixing Britain onto working people. In order to fix Britain we need a mass redistribution of wealth and power away from the 1%, back to working people. Help us fix Britain at takebackpower.net (https://takebackpower.net)*."*





One of those taking action today is Elvis, a delivery driver from Bolton, who said:

"I'm taking action with Take Back Power in order to highlight corruption and inequality in the UK. Sotheby's have donated 100,000 to Reform plc, in exchange for more tax breaks for the super wealthy if they get elected."

"Meanwhile millions of families still struggle to put food on the table every single day. We can make a change if we all come together and build a system that's fairer and more representative of the British people. To find out more go to takebackpower.net (https://takebackpower.net)*."*

Also taking action today is Jimmy, 74, a retired NGO worker, from London who said:

"There was a time when the super-rich would be taxed at a much higher rate than ordinary working people, and we had a functioning health system and affordable housing. Nowadays corporations and billionaires pay next to no tax through using loopholes and offshore accounts."

“Reform wants to give even more tax breaks to the super wealthy who are already breaking Britain. We need ordinary people at the heart of deciding how to tax extreme wealth to begin fixing Britain. This is why we are calling for a permanent citizen’s assembly, with the power to tax extreme wealth- a ***House of the People****.”*

Reform is backed primarily by the super-rich and corporations. This includes donations from crypto-billionaire Christopher Harborne, Claudia Harmsworth, wife of the owner of the Daily Mail- Lord Rothermere, and London’s leading luxury interior designers- Interior Architecture Landscape. [2]

We need to Take Back our Power from the super-rich, which is why Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen’s assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Take Back Power ‘take over’ the playgrounds of the super-rich

April 30, 2026(https://takebackpower.net/2026/04/30/)



Take Back Power supporters have been ‘taking over’ the playgrounds of the super-rich this morning. Take Back Power is a nonviolent campaign, demanding a tax on extreme wealth, to be decided by a ‘House of the People.’ [1]

At around 10 this morning, 22 Take Back Power supporters occupied a Ferrari dealership in Berkeley Square, they could be heard chanting “WE DEMAND EQUALITY!” and “THE BILLIONAIRES HAVE GOT TO GO!”. By around 10:30 the group left the store.

At around 11:30, the group reconvened at Burlington Arcade- the world’s first modern shopping mall, which positions itself as an ‘elegant and exclusive upmarket shopping venue’. The group could be seen holding signs which read “HOUSE OF THE PEOPLE” and “4 MILLION KIDS IN POVERTY”, which were quickly seized by door staff.

By around 12:20, the group had moved on to the food hall at the luxury department store, Harrod's. Security was much more reactive, dragging Take Back Power supporters from the building.

(https://takebackpower.net)

A Take Back Power spokesperson said:

"This country is in crisis and everyone knows it! The people to blame are the corporations and super-rich who are extracting every last penny from working people, and then using their ownership of the media to distract people into blaming the poor and migrants. Nothing short of a massive transfer of wealth and power away from the 1% and back to working people can hope to fix Britain. Join us at takebackpower.net (https://takebackpower.net)."





One of those taking action today is Robert Pembroke, 43, a builder and dad from Devon, who said:

It's time ordinary people take back our power from the super-rich. Inequality is spiralling out of control, 50 families in the UK hold more wealth than 50% of the country. Around the world, it's even worse with eight men holding more wealth than 50% of the world's population!"

"It is obscene to allow this, people are dying. We need ordinary people, taking part in a permanent citizens' assembly- a ***House of the People*** *deciding how to tackle this. To find out more go to takebackpower.net (https://takebackpower.net)."*





Also taking action today is Ana Heyatawin, 63, a grandmother from Somerset, who said:

"Inequality, which is being imposed on ordinary people by big business, billionaires and the politicians who work for them, is killing people right now. More than a third of people in the UK now don't earn enough to buy life's essentials."

"We need ordinary people at the heart of deciding how to tax extreme wealth to begin fixing this mess. This is why we are calling for a permanent citizen's assembly, with the power to tax extreme wealth- a ***House of the People****."*

It's time working people take back our power from the super-rich. This is why Take Back Power is demanding that the UK government establish a permanent **House of the People—** a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Take Back Power supporters redistribute essential items whilst occupying high-end stores and hotels

May 1, 2026(https://takebackpower.net/2026/05/01/)



Take Back Power supporters have been occupying the playgrounds of the wealthy this morning, and have liberated items from a superstore to redistribute them back to the communities that need them. Take Back Power is a nonviolent campaign, demanding a tax on extreme wealth, to be decided by a **'House of the People.'** [1]

At around 9 this morning, three Take Back Power supporters entered the Tesco Extra on Acre Lane in Brixton, and took essential items from the shelves and left without paying. The action takers then donated the items at a local food-bank

drop-off point. At around 10am, all three attempted to hand themselves in at Brixton Police Station. So far none have been arrested.

At 11:45, around a further 18 Take Back Power supporters occupied the luxury department store Liberty, on Regent Street in London. They could be seen holding signs which read '3 MILLION HOUSEHOLDS SKIPPING MEALS' and 'TAX THE SUPER-RICH NOW.'

At around 1pm, this group then reconvened, disrupting access to the luxury hotel, Claridges. The group could be heard chanting "WE DEMAND EQUALITY!' and 'HOW DO WE TAX THE SUPER RICH?- A HOUSE OF THE PEOPLE!' as security attempted to move the supporters away from the door.

A Take Back Power spokesperson said:

*"Take Back Power is calling for an emergency '**House of the People**' to deal with the cost of living crisis. When politicians are too busy lining their pockets to fix our problems, we need the people most impacted to have a seat at the table. A **House of the People** selected by democratic lottery, like a jury, is a no-brainer solution to cut out the corruption and decide how to redistribute wealth."*





One of those taking action redistributing food today is Moshe Dixon, 25, from Dundee said:

"My mother came from poverty and fought tooth and nail to give me a better future. Like so many mothers she was promised that hard work would be rewarded, yet we are living in a country where so many families can't make ends meet despite working multiple jobs."

"6.5 million people had to turn to foodbanks in 2024. Meanwhile the CEO of Tesco is taking home 430 times the pay of the average Tesco employee, and the rich are paying a smaller share of tax than working people. We need an assembly of ordinary people coming together to decide how to tax extreme wealth in order to fix our broken country. Join us at takebackpower.net (https://takebackpower.net)."





Also taking action today occupying high-end stores and hotels, is Hannah McDonald, 20, a student from Liverpool, who said:

"Fourteen million people last year were faced with the prospect of going hungry, in this, the 6th richest nation on earth! Now we have a cost of living tsunami on the way and the government is nowhere to be seen."

"This is broken Britain. We need a ***House of the People****— an assembly with real power, where ordinary mums, nurses, posties & cleaners, get a real say in how to take back our power from the super rich, and redistribute that wealth and power back to working people."*

Today's actions come as the UK braces for food shortages and soaring prices as a result of the war in Iran, as rising fuel, fertiliser and commodity prices begin to feed into business costs. [2]

It's time we take on the super-rich who are profiteering from a world in crisis. This is why Take Back Power is demanding that the UK government establish an emergency **House of the People—** a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW20

This is the exhibit marked "AJW20" in the witness statement of Alexander James Wright.

Look what you made me do.



Two young people received suspended sentences today for spray-painting two private jets at Stansted Airport in June 2024 to demand the UK government negotiate a treaty to phase out oil and gas by 2030. [1]

They were found guilty of criminal damage at Chelmsford Crown Court in September. Jennifer Kowalski, 29, from Dumbarton recieved a 5 month custodial sentence suspended for 12 month, Cole Macdonald, 23, from Brighton was handed a six week custodial sentence suspended for 8 months plus 20 days rehabilitative activity. The two had cut through the wire perimeter fence at Stansted and sprayed paint from a fire extinguisher onto two private jets parked at Stansted Airport, just hours after Taylor Swift's plane had landed. [2]

At trial, the prosecution claimed the planes required extensive professional cleaning costing about £12,000. Judge Mill ruled the damage too serious for the defendants to rely on their rights to free expression and assembly under Articles 10 and 11 of the European Convention on Human Rights. The jury was therefore not allowed to consider whether restricting those rights was a proportionate response to the alleged damage. [3]

After their arrest both were held for 11 days on remand, until released on bail. Cole then spent 39 weeks on curfewed tag (this equals a four month custodial sentences) While tagged Cole was arrested five times for breach of bail, approximately once every two months. Once she was being held in police custody, another time she was in hospital seeking treatment for back pain after informing the monitoring service. None of the five arrested resulted in breaching bail being proven.

Before sentencing Jennifer Kowalski, 29, a former sustainability manager from Dumbarton, said:

"Whilst Taylor and her fans have been celebrating her eras, we have entered a new one – the era of global boiling. This is an era that will not end with a rebrand; it will end all others. As a former Swiftie, I know what Taylor stands to lose, because there is no folklore without human culture, no music on a dead planet.

"The court system can take our freedom, our autonomy, our dignity, and deny us basic rights. But they can never take my convictions, to fight for a future for us all. Whatever happens in a court room, that is who I am today, and they can never change that."

A Just Stop Oil spokesperson said

This trial, the saga of mismanaged draconian bail conditions and the sentences demonstrates, again, the establishment will protect the wealthy and privileged while punishing those seeking to protect us and defend our freedoms and natural justice.

In just seven months of 2022, Taylor Swift's private jet logged 170 flights – 15.9 full days in the air, averaging 80 minutes and 139 miles per trip. Yard, the sustainability marketing firm that compiled the data, estimated her total carbon emissions at 8,293.54 tonnes of CO_2, more than 1,100 times that of an ordinary person over an entire year. [4]

A study published in Nature and reported by National Geographic found that private aviation generated at least 15.6 million tonnes of CO_2 in 2023, with an average of 3.6 tonnes emitted per flight. Almost half of all private-jet journeys were under 500 kilometres,

and around one in five covered less than 200 kilometres, distances that could often be travelled by rail or road. The researchers noted that some aircraft models can emit more carbon in a single hour than an average person produces in an entire year. [5] [6]

The music industry, and even artists of Taylor Swift's stature, are not shielded from the accelerating climate collapse. In November 2023, 23-year-old Ana Clara Benevides collapsed and later died from heat exhaustion while attending Swift's concert in Rio de Janeiro during a record-breaking heatwave that pushed temperatures above 40°C. [7]

In recent months, the musician Steve Miller cancelled his entire North American tour citing the growing threat of extreme weather, describing the decision as unavoidable in light of intensifying heat, floods and wildfires. Artists and organisers are already facing rising costs, cancellations and safety risks as performances are disrupted by record temperatures and severe storms. Extreme weather, driven by fossil fuel combustion, is already endangering lives and reshaping the conditions in which global entertainment operates. [8]

ENDS

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW21

This is the exhibit marked "AJW21" in the witness statement of Alexander James Wright.

FØSSIL FREE LONDON



Fossil Free London is 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. We advocate for a rapid and just transition towards a sustainable and equitable society.

In London? **Sign up to a welcome talk.**

Or join our **mailing list** and follow us on social media.

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CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

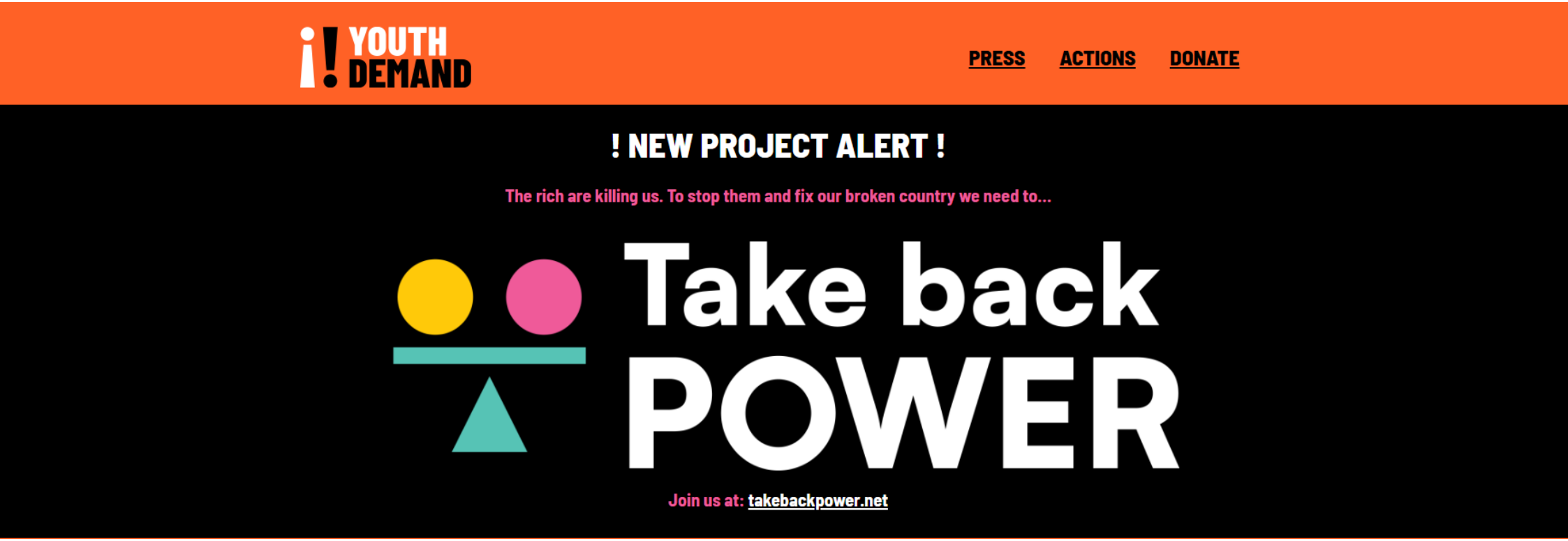
- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW22

This is the exhibit marked "AJW22" in the witness statement of Alexander James Wright.


YOUTH DEMAND
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ACTIONS
DONATE
! NEW PROJECT ALERT !
The rich are killing us. To stop them and fix our broken country we need to...
Take back POWER
Join us at: takebackpower.net

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW23

This is the exhibit marked "AJW23" in the witness statement of Alexander James Wright.

Two Just Stop Oil supporters found guilty for Heathrow paint spraying following retrial

by **The Canary** — 14 May 2026 in **News**, **UK** Reading Time: 4 mins read

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Two Just Stop Oil supporters who sprayed Heathrow departure boards with orange paint during the Oil Kills international uprising to end fossil fuels in July 2024 have been found guilty in a retrial after the jury in an earlier trial failed to reach a majority decision.

Phoebe Plummer and Jane Touil were appearing before Judge Duncan at Isleworth Crown Court for the second time on a charge of criminal damage over £5,000 for their action on 30 July 2024 to demand a fossil fuel treaty to end oil and gas by 2030.

The jury took four-and-a-half hours to reach a majority verdict of 10-2. Following the verdict, Touil said:

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> *Since I took action, global fossil fuel use and emissions have continued to rise. More than ever, we need a global fossil fuel treaty to help governments rapidly phase out fossil fuels.*
>
> *What we do at this moment in history matters. But there is a difference between laws and morality. The courts apply the law made by powerful people. Morals come from within. It is our morals that give us our conscience. I have always tried to live according to my conscience.*

Plummer said:

> *The climate crisis is the greatest injustice that humanity has ever faced. We should all consider what to do at this time. No individual caused this crisis and no one is solely responsible for stopping it. But we can choose what we do to alleviate suffering.*
>
> *I feel compelled to act to be a responsible citizen, a loving aunt and a good person. It compels me to hope for a better future and one where my nephew grows up.*
>
> *I didn't think the action would change government policy. But non violent civil resistance is a necessary part of tackling the climate crisis and I'm grateful and proud to have been part of that.*

Plummer was remanded for 58 days and Touil for 14 days following the 2024 action in which the pair used fire extinguishers to spray diluted water-based paint in Heathrow Terminal 5 including at the departure boards. The Crown alleged that the action caused £8,000 worth of damages and that three of the display screens needed to be replaced.

Judge ruled out various defences for Heathrow action

At trial, Judge Duncan ruled out several legal defences for the action including those of 'reasonable excuse' under Articles 10 and 11 of the ECHR, 'necessity' and 'self defence' on the grounds that the threat from climate change was not proximate enough and the actions too far removed from the threat.

The defendants were allowed to argue belief in consent: that they honestly believed the owners of Heathrow would have consented to the damage if they knew of its circumstances. However, evidence of the relevant circumstances was to be limited to the fact that it was a climate protest with all evidence about the scale and urgency of the climate crisis ruled 'irrelevant and therefore inadmissible'.

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In giving evidence, Touil said:

> *I genuinely and sincerely believed that if the shareholders [of Heathrow] had a full understanding of the situation we are in they would have given their consent to our action.*
>
> *Most people believe there is something that is wrong with climate but not many people have access to the full situation because the fossil fuel industry has used their immense wealth to ensure that governments do not act and it is not reported in the mainstream media.*
>
> *So I don't know if shareholders have a full understanding, but I know that if they did, they would be doing all in their power to stop fossil fuels because there will be no business as usual, no functioning society, half the population could be wiped out along with 50% of global GDP. I think shareholders want to protect their investment but they also want a future for their kids.*

In her evidence Plummer said:

> *I want to make it very clear that this was not a protest against Heathrow, or anyone flying through Heathrow that day. It's true that the aviation industry is especially harmful to the climate in terms of emissions, though it is a small number of frequent fliers and private jet users who cause the vast majority of this harm, not families who save up for a holiday once a year.*
>
> *But this wasn't about getting people to stop flying. I made this individual change to live in line with my values, but honestly I know that it's pretty inconsequential. Even if we all woke up tomorrow and stopped flying and went vegan, it would be like mopping up a spill from an overflowing bath whilst leaving the tap on.*
>
> *All individual changes are like this when we are facing a systemic issue. If fossil fuels are extracted from the ground, then they will all be burnt, even if it's not on a flight that you're on. We need*

> *systemic change, that has always been Just Stop Oil's demand.*
>
> *My intention was not to cause damage. My intention was to take part in an act of nonviolent civil resistance, raising a serious alarm bell to the catastrophic future in store for us if we persist in our addiction to fossil fuels.*

Featured image via Just Stop Oil

Tags: climate crisis fossil fuels Just Stop Oil protest

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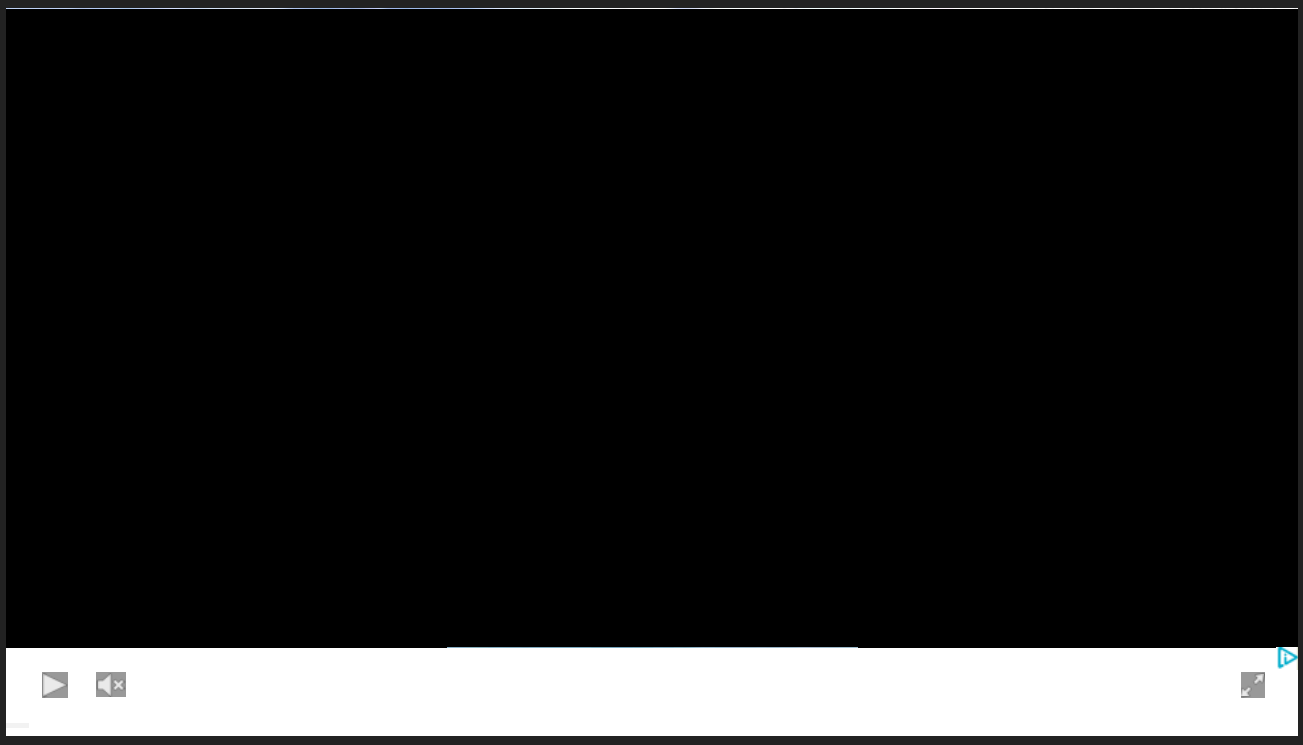
Just Stop Oil activists who sprayed Stonehenge with orange powder cleared of criminal damage

They cited human rights law in their defence

Rod Minchin
Friday 31 October 2025 17:12 GMT



Prosecutors release videos played in trial of Just Stop Oil activists accused of damaging Stonehenge

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Three Just Stop Oil activists who took part in a protest in which Stonehenge was sprayed with orange powder have been found not guilty of criminal damage and causing a public nuisance.

It follows a trial at Salisbury Crown Court where they cited human rights law in their defence.

Then-Oxford University student Niamh Lynch, 23, and Rajan Naidu, 74, had been accused of using two colour blasters filled with cornflour, talc and an orange dye to spray the monument.

Salisbury Crown Court was told the pair – along with a third activist, Luke Watson, 36 – targeted Stonehenge as part of an ongoing fossil fuel protest by the Just Stop Oil group the day before the 2024 summer solstice.

About 15,000 people were due to gather and celebrate at the monument.

Naidu and Lynch had crossed the boundary ropes and trespassed into the area around the monument before launching the attack.



Just Stop Oil protesters sit down after an orange substance was sprayed on Stonehenge *(PA Media)*

Watson had bought the equipment used in the attack and had driven his co-accused to Stonehenge that morning.

Prosecutors alleged the protest had been “carefully planned” and was filmed by other Just Stop Oil supporters with footage released publicly afterwards.

Simon Jones, prosecuting, said: “Putting it simply, we say they were all in it together.

“The prosecution say that this is an act of blatant and clear vandalism. The intention is undoubtedly to make a statement.”

After the attack, Naidu and Lynch, who were both wearing white Just Stop Oil T-shirts, sat down in silence in front of the stones until they were arrested.

The court heard the stones were promptly cleaned. The costs of removing the powder totalled £620.

Mr Jones added: “Stonehenge is arguably the best recognised and architecturally sophisticated prehistoric stone circle in the world, built around 5,000 years ago.

“The site in Wiltshire is visited by members of the public from all over the world, providing both an education and spiritual experience.

“The stones are a protected ancient monument.”





Judge Paul Dugdale told the jury in his legal directions they had to assess where the “balance lies” in the case and whether a conviction would be a “proportionate interference” with the defendants’ rights.

RECOMMENDED

- Footage shows moment Just Stop Oil protesters spray orange paint on Stonehenge, court hears
- Just Stop Oil to end disruptive protests with final demonstration date announced
- Two deny charges over Just Stop Oil protest at Stonehenge
- Two people charged by police after orange paint was thrown at Stonehenge in Just Stop Oil protest

“In any society there will be those whose opinions we agree with and those whose opinions we disagree,” he said.

“The essence of a free society and freedom of speech is that everyone’s entitled to express their opinion even when we disagree with what they say.

“If individuals disagree with what our government is doing on certain matters, they are entitled to protest about the government’s actions or inactions.

“All of this is the essence of our free society. It’s how our society has developed over the centuries, and the reality is we are very fortunate to live in a free society.

“There are times when protecting the right to freedom of speech and freedom to protest can mean that activity that would otherwise be unlawful would be regarded as lawful by the court to protect those rights.”

The jury found Naidu, of Gosford Street, Birmingham; Lynch, of Norfolk Road, Turvey, Bedford; and Watson, of The Street, Manuden, Essex, each not guilty of the two charges after deliberating for six hours.

More about: Stonehenge Just Stop Oil Salisbury Crown Court Human rights law Activists

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Three Just Stop Oil supporters walk free after trial for M25 gantry action

Court & Prison, Press / September 11, 2025

Three Just Stop Oil supporters were found not guilty of public nuisance at Guildford Crown Court today, after peacefully climbing gantries on the M25 in 2022, to demand an end to new fossil fuel projects.[1]

Sam Holland, Rachel Payne and Isabel Rock took action on the M25 on 9th November 2022. They were

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During the trial the prosecution emphasised that this was a planned and coordinated action that resulted in significant delays to the travelling public, that all three defendants were trespassing in a place that was forbidden to the public and that they had taken considerable risks with public safety. Giving evidence National Highways Ltd claimed that traffic was delayed by between 4 and 5 hours and that between 9,000 and 30,000 vehicles were impacted. None of the defendants denied the indictment, but they argued that they had a reasonable excuse for their actions.

Sam Holland argued that he had wanted to prevent harm. He had read academic papers which pointed to catastrophic consequences for humanity from burning fossil fuels, including food system collapse.

Rachel Payne explained that she took action because she was fearful for her children and grandchildren about government inaction on the climate crisis. She highlighted the government breaking its 2015 climate agreements by offering new fossil fuel licences.

Isabel Rock said that she felt a duty to look after people younger than herself and that the climate crisis is going to touch every single part of their lives. Taking action was something she weighed up very seriously and that as a self employed person, she knew how hard it was for people to earn money and to get by. However she felt that if they could see some of these agreed facts about the seriousness of the climate crisis, she hoped they would understand.

The Judge, Recorder L Harris, ruled that it was for the jury to decide whether or not the supporters had a reasonable excuse for their actions.

In their closing speeches, all the defendants were able to refer to the agreed facts in the case, which included several key facts relating to the climate crisis.

In his closing speech, Sam Holland said:

"We brought evidence on the largest evil committed in human history: the continued drilling and burning of oil and gas in full knowledge that large parts of humanity will be killed. The prosecution has said that these are beliefs. They are not beliefs. This is not a cause. This is not another 'issue'. This is billions of deaths. Not according to me, according to the world's leading scientists. These are the facts. If we hit 3C of warming by 2050, there could be four billion human deaths. Half of the world's current population.

"What was the UK government doing? It was issuing over 100 new licences for companies to explore and drill oil and gas in the North Sea. In the knowledge of everything I've just said, which is public knowledge and has been known for decades, the government was still wanting to drill. Unimaginable evil. We all talked about how we had extensively tried other methods for making change. Signing petitions, emailing MPs, going on conventional marches... So we had to turn to disruptive action.'

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"I thank the members of the Jury deeply for their 'common sense' verdict — they were actually permitted to hear the several climate related agreed facts, which were read out to them, about the severe threats the present emergency poses to our world and they listened!

I thank the prosecution for agreeing to those facts following earlier trials I attended in which the 'whole truth' was repeatedly denied to the Jury. I thank the Judge for allowing them to decide that we "more likely than not" had a reasonable excuse for what we did.

In my statement to the police, I urgently expressed my fears for my family and world and my hopes for an 'eco-U- turn'. With this acquittal, I feel this may be closer to being made possible. The tide may well be turning if the agreed facts on climate, allowed in this trial, can become widely known and acted upon internationally."

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.

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: https://juststopoil.org/press-media

Heathrow 10 images here:
https://drive.google.com/drive/folders/1mByhU4LBPB6t5pMAP_-5dJOkhvsxwTNX?usp=sharing

Website: https://juststopoil.org/

Facebook: https://www.facebook.com/JustStopOil/

Instagram: https://www.instagram.com/just.stopoil/

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Morning Star for Peace and Socialism

Britain / 29 August 2025

Eight JSO supporters acquitted of public nuisance after petrol station action



JSO activists blocking a service station on the M25 in August 2022. Photo: Just Stop Oil

EIGHT Just Stop Oil activists have been cleared of causing a public nuisance after disrupting Britain's largest petrol station.

Michael Davies, Charles Laurie, Phoebe Frewer, Sophie Sharples, Tez Burns, Peter Lay, Gareth Harper and Emma Ireland took action at Cobham motorway services in Surrey in August 2022.

As part of a wider campaign targeting petrol stations along the M25, the activists were among a group of 35 who also took action at Clacket Lane services in Kent and Thurrock services in Essex.

At Guildford Crown Court on Wednesday, all eight defendants were found not guilty of intentionally or recklessly causing a public nuisance by blocking the entrance to Cobham services.

However, Mx Burns and Mr Lay were found guilty of causing criminal damage, while Mr Laurie was found guilty of possession of a hammer with intent to damage property after two petrol pumps were damaged.

Following the verdict, Ms Ireland said: "I am grateful to the judge and the prosecution for allowing the agreed facts on the climate crisis to have played a part in this trial and for allowing us to speak to our motivations without fear of being found in contempt of court.

"The prosecution spoke about common sense and I was reminded that, in 2022, I felt that common sense would have been for the Conservative government to stop issuing new oil and gas licences, to show a commitment to reducing carbon emissions and, in turn, to offer some protection to humanity from the gravest predictions of climate collapse."

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Morning Star for Peace and Socialism

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Hung jury in latest Just Stop Oil gantry case

Court & Prison, Press / July 21, 2025

A Just Stop Oil supporter faces retrial after a jury was unable to reach a verdict in relation to her participation in the M25 gantry climbing actions in November 2022 demanding an end to new oil and gas licencing. [1]

A 12-member jury at Southwark Crown Court was unable to reach a verdict in the case of a Just Stop Oil supporter charged with the new statutory offence of 'causing a public nuisance' under the Police, Crime, Sentencing and Courts Act 2022, following more than 9 hours of deliberations over three days.

Theresa Norton, 66, a former councillor and carer, took part in a Just Stop Oil action on the M25 in November 2022, during which she climbed a gantry near junction 1b on 7 November, to demand an end to all new oil and gas projects – a demand that has since been adopted as official government policy. She did

The CPS has now been allowed 7 days by Judge Tomlinson to determine whether it will pursue a retrial.

In her evidence to the Jury, Norton said:

"I acted on my conscience. My despair turned into action into hope. Sadly, conscience is not a legal defence. Therefore, you'll be directed to ignore this evidence, all that I've said, and come to your verdict only on the evidence as presented by the prosecution. This leaves you with no choice, no agency, you have become part of the machinery of state. Accepting of the cognitive dissonance that can happily see a government declare such statements as seen in the Agreed Facts, whilst simultaneously issuing 130 new oil and gas licences, planning for extra runways at airports, building more roads, refusing to implement plans to insulate our badly designed cold and draughty homes, continuing with subsidies to fossil fuel companies to the tune of millions of pounds a week and delaying investment for sustainable green energy, because the fossil fuel lobby is powerful and generous with donations to influential think tanks.

The climate crisis was only getting worse in 2021. Talks by eminent climate scientists were telling us to act, do something. In 2022, a third of Pakistan was under flood water- 1700 dead, 13,000 injured, 8 million displaced. Portugal, Germany and France had rampant wildfires. In July there were wildfires in UK and 40 degrees in London for the first time. London Fire Brigade had its busiest day since WW2.

Civil resistance is a communicative act. It communicates that something is very wrong and needs to change. It is not trying to seize power in a violent armed revolution. It is nonviolent and peaceful. Facts, information and science do not motivate people to change. Tell a smoker that smoking kills and they'll carry on. Facts are not what powers the human heart. That's why just talking about science will not save us and quoting all the statistics in the world will not move us to change. You have to bring emotions into it. Nonviolent direct action has a history of effecting change. We've been vindicated. That oil and gas will stay in the sea. But I stand here because I maintain the courage of my convictions. I believe that when we see clearly through that state machinery, it is only our collective conscience that can truly be relied upon."

During the trial, the Crown prosecution acknowledged the findings of the 2020 Net Zero Interim report, which stated:

"Climate change is an existential threat to humanity. Without global action to limit greenhouse gas emissions, the climate will change catastrophically with almost unimaginable consequences for societies across the world." [3]

Additionally, the prosecution agreed upon the established scientific consensus that warming exceeding 1.5 degrees Celsius above pre-industrial levels poses 'catastrophic' and 'irreversible' risks to humanity. It was further accepted that the average global temperature rise for the year ending 2024 was 1.65 degrees Celsius, with projections indicating that warming would permanently surpass 1.5 degrees Celsius before 2030.

Just Stop Oil continues to stand by those prosecuted for peaceful resistance against fossil fuel expansion in the face of rapidly accelerating climate collapse.

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: https://juststopoil.org/press-media

Website: https://juststopoil.org/

Facebook: https://www.facebook.com/JustStopOil/

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Twitter: https://twitter.com/JustStop_Oil

Youtube: https://juststopoil.org/youtube

TikTok: https://www.tiktok.com/@juststopoil

Notes to Editors

[1] Just Stop Oil is a member of the A22 Network of civil resistance projects.

April 26th 2025 was the last Just Stop Oil action, but our supporters will continue to tell the truth in the courts, speak out for our political prisoners, and call out the UK's oppressive anti-protest laws.

Just Stop Oil continues to rely on small donations from the public to make this happen.

[2] https://juststopoil.org/2023/10/30/no-prison-for-m25-injunction-breakers/

[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004025/210615_NZR_interim_report_Master_v4.pdf

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Palestine Action

This article is more than **4 months old**

Palestine Action activists cleared of aggravated burglary at Israeli defence firm site

None of the six activists were convicted of any offence over break-in at Elbit Systems factory near Bristol in 2024

Haroon Siddique *Legal affairs correspondent*

Wed 4 Feb 2026 13.54 GMT

Prefer the Guardian on Google

Six Palestine Action activists have been cleared of committing aggravated burglary over a break-in at an Israeli defence firm's UK site.

Charlotte Head, Samuel Corner, Leona Kamio, Fatema Rajwani, Zoe Rogers and Jordan Devlin were accused of threatening unlawful violence and using sledgehammers as weapons after a prison van was driven into Elbit Systems' factory in Filton, near Bristol, on 6 August 2024.

But after a trial at Woolwich crown court, south London, none were convicted of any offence.

All six were acquitted of aggravated burglary, which carries a maximum sentence of life imprisonment, and jurors found Rajwani, Rogers and Devlin not guilty of violent disorder.

The jury deliberated for 36 hours and 34 minutes but could not reach verdicts for charges of criminal damage against any of the six defendants. This was in spite of all of the defendants, except Devlin, telling jurors they had entered the factory without permission and damaged Elbit's equipment including computers and drones.

Additionally, no verdict was reached in the allegation that Corner, 23, inflicted grievous bodily harm on police sergeant Kate Evans, or on the charges of violent disorder against Head, Corner and Kamio.

Before the verdicts on Wednesday, Mr Justice Johnson told the jurors he was not going to ask them to deliberate further, because "you believe that you can go no further than you have got to already".

The activists hugged one another in the dock as a dozen of their supporters cheered from the public gallery above.

Deanna Heer KC, prosecuting, had told the jury that the defendants were all armed with sledgehammers, which she said were not only intended to be used to damage property but also as weapons "to be used if necessary to threaten and damage people".

Heer alleged security guards were sworn at, had sledgehammers swung at them and were whipped, while one was sprayed with a foam fire extinguisher.

Rajiv Menon KC, representing Head, said any violence by the defendants was clearly unplanned, that the defendants had not expected security guards to enter the factory and were "completely out of their depth".

He compared Head to the suffragettes, while describing Elbit Systems, of which Elbit Systems UK is a subsidiary, as a "dreadful company [that] has played a critical role in the killing of tens of thousands of Palestinians".

The defence also argued that the security team had used excessive force and pointed to missing CCTV footage.

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During the trial one juror asked the judge whether it would count as a lawful excuse if a defendant believed they were performing a life-saving action by destroying weapons used to kill civilians in an illegal genocide. Johnson said it would not, but Menon reminded the jurors of their absolute right to acquit.

Heer and Johnson both told the jurors, before they began deliberating, that they should disregard their views on the conflict in the Middle East.

After the verdicts, Rogers' mother, Clare, said: "Our loved one's action against Elbit Systems and the state's brutal response have exposed the true values of the government. The government is determined to do business with Israel and protect its weapons industry at any cost.

"Our loved ones dared to poke this beast - and no expense has been spared in policing, prosecuting and imprisoning them without trial. Imagine if the government had put the same amount of money, resources and political will into preventing a genocide."

A spokesperson for Defend Our Juries, which has organised rallies opposing the ban on Palestine Action, which took effect on 5 July last year, said the verdicts were "a huge blow to government ministers" who had "tried to portray Palestine Action as a violent group to justify banning it under badly drafted terrorism legislation".

Amnesty International also said it showed how disproportionate the proscription decision was.

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CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW24

This is the exhibit marked "AJW24" in the witness statement of Alexander James Wright.

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.

N244

Application notice

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Name of court **The High Court of Justice** **King's Bench Division**	**Claim no.** **KB-2024-2132**
Fee account no. (if applicable) **PBA0087211**	**Help with Fees – Ref. no.** (if applicable) H W F - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Manchester Airport Plc and others	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	18 June 2026 18 Jun 2026

HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
KB-2024-002132

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

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?
   The Claimants seek permission, pursuant to CPR 17.1, to amend the Amended Particulars of Claim in the form accompanying this application, so as to update reference within them to the East Midlands Airport Byelaws 2025, which have replaced the previously applicable East Midlands Airport Byelaws 2001.

   The Claimants ask that this application be considered and heard at the second annual review of the injunctions granted pursuant to the order of Her Honour Judge Coe KC dated 5 July 2024, which has been listed to take place on 30 June 2026 (together with the second annual review of the injunctions granted in actions KB-2024-001765, KB-2024-002317 and KB-2024-002473).

   The Claimants will file a draft form of order ahead of such hearing, which will provide for this application.

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: 30 June 2026 (second annual review hearing)

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

9. Who should be served with this application?	Defendants (Persons Unknown)
9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.	The Claimants will arrange for service on the Defendants (Persons Unknown)

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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.

We refer to the witness statement of Alexander James Wright dated 11 June 2026 which has previously been filed with the Court.

The Claimants apply for permission to amend the Amended Particulars of Claim in the form enclosed with this application so as to refer to the provisions of the East Midlands Airport Byelaws 2025, which have replaced the East Midlands Airport Byelaws 2001 - which the Claimants respectfully submit should be reflected in the statements of case.

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

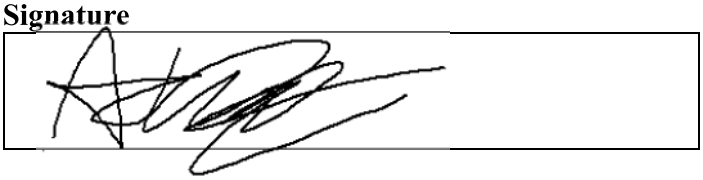
Statement of Truth

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
18	June	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

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Fax phone number

DX number

Your Ref.

292659.000057/WRIGHTAX

Email

alexwright@eversheds-sutherland.com

Amended pursuant to the order of HHJ Coe K.C. dated 5 July 2024

Re-amended pursuant to the order [ ] dated [ ]

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2024-002132

BETWEEN:-

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Defendants

[DRAFT] RE-AMENDED PARTICULARS OF CLAIM

Manchester Airport

1. The First Claimant is the operator of Manchester Airport, located in Manchester M90 1QX, shown outlined in red on Plan 1 ("**Manchester Airport**"). Manchester Airport serves around 25 million travelling passengers each year with an annual revenue of approximately £425 million.

2. The First, Second and Third Claimants are the registered proprietors of the land on which Manchester Airport is situated as shown in red on Plan 1, through a mixture of freehold and leasehold interests as shown in the Title Schedule hereto — but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas and subject also to certain highways.

3. Subject to those interests, the First, Second and Third Claimants are entitled to an immediate right of possession occupation and control of Manchester Airport, by virtue of their respective titles as shown in the Title Schedule.

4. Plan 1A depicts the areas within Manchester Airport which are the subject of third party interests, shown thereon shaded in blue, green and brown ("**the Manchester Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First, Second and Third Claimants are displaced as the persons with an immediate right of occupation or possession. The brown land is a railway/ railway station. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes certain the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

5. Nevertheless, access to or from the Manchester Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Manchester Aiport which remain unencumbered by any such arrangement and in relation to which, accordingly, the First to Third Claimants remain entitled to possession occupation and control by virtue of their interests shown in the Title Schedule.

6. Also shown on Plan 1A are the highways shown shaded in pink on Plan 1A, which run beneath the taxiway within the Airport and/or provide access to Manchester Airport to the First to Third Claimants and their licensees (including members of the public).

7. By virtue of s63 of the Airports Act 1988, the First Claimant has power to make byelaws with respect to Manchester Airport. Pursuant to the Manchester Airport Byelaws 2024, byelaw 3.36, 3.10 and 3.34, no person has a right to use any part of Manchester Airport as defined therein for protest. The plan which defines Manchester Airport for the purposes of the Byelaws is not in all respects identical to Plan 1. However, the area covered by the Byelaws includes (a) the Manchester Third Party Areas and (b) the highways therein.

Stansted Airport

8. The Fourth Claimant is the operator of Stansted Airport, located in Stansted CM24 1QW, shown outlined in red on Plan 2 ("**Stansted Airport**"). Stansted Airport serves around 25 million travelling passengers each year with an annual revenue of approximately £373 million.

9. The Fourth Claimant is the proprietor of the land on which Stansted Airport is situated as shown in red on Plan 2, through the interests shown in the Title Schedule hereto—— but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

10. Subject to those interests of third parties, the Fourth Claimant is entitled to an immediate right of possession occupation and control of Stansted Airport, by virtue of its titles as shown in the Title Schedule.

11. Plan 2A depicts the areas within Stansted Airport which are the subject of third party interests, shown thereon shaded in blue, green, purple and pink ("**the Stansted Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fourth Claimant is displaced as the person with an immediate right of occupation or possession. The purple land is a railway station. The pink land is a railway tunnel. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes certain the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

12. Nevertheless, access to or from the Stansted Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Stansted Aiport which remain unencumbered by any such arrangement and in relation to

which, accordingly, the Fourth Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

13. By virtue of s63 of the Airports Act 1988, the Fourth Claimant has power to make byelaws with respect to Stansted Airport. Pursuant to the Stansted Airport Byelaws 1996, byelaws 3.17 and 3.19, no person has a right to use any part of Stansted Airport for protest.

East Midlands Airport

14. The Fifth Claimant is the operator of East Midlands International Airport, located in Castle Donnington, Derby DE74 2SA, shown outlined in red on Plan 3 ("**EMA**"). EMA served around 3.3 million travelling passengers each year with an annual revenue of approximately £81 million.

15. The Fifth Claimant is the proprietor of the land on which EMA is situated as shown in red on Plan 3, through the interests shown in the Title Schedule hereto—but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

16. Subject to those interests of third parties, the Fifth Claimant is entitled to an immediate right of possession occupation and control of EMA, by virtue of its titles as shown in the Title Schedule.

17. Plan 3A depicts the areas within EMA which are the subject of third party interests, shown thereon shaded in blue and green ("**the EMA Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fifth Claimant is displaced as the person with an immediate right of occupation or possession. The blue land consists of (and the green land includes) areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes certain the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

18. One of those areas, namely, the East Midlands Aeropark, takes direct access from the public highway. Subject to that exception: access to or from the EMA Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of the EMA which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fifth Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

19. By virtue of s63 of the Airports Act 19~~9~~86, the Fifth Claimant has power to make byelaws with respect to EMA. Pursuant to the East Midlands Airport Byelaws 2025 ~~2001~~, byelaw 3.34, 3.36 amd 3.37 ~~3.5~~, no person has a right to use any part of East Midlands ~~Stansted~~ Airport for protest without prior approval from the Fifth Claimant.

The Claimants' claims

20. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management/ airline facilities, and a railway station.

21. In relation to each airport:

    a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).

    b. No wider consent subsists; and (subject to the highways at Manchester Airport described above) no public right of access, or way, subsists over the airports.

    c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.

    d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

22. In relation to the Third Party Areas at each airport:

a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the Court to make an order which does not distinguish between the airports generally (as shown outlined in red on the various plans) and the Third Party Areas within them;

b. Further or alternatively, protest which occurs on the Third Party Areas threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.

23. Further, in respect of the highways at Manchester Airport described above: protest which occurs on these highways threatens:

a. Unreasonably and substantially to interfere with the First,Second and Third Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;

b. Unreasonably and substantially to obstruct or hinder the free passage along the highway, occasioning particular damage to the First, Second and Third Claimants; and

c. In respect of the tunnelled highway in pink on Plan 1A, unreasonably and substantially to interfere with the First, Second and Third Claimants' ordinary use and enjoyment of the airport, insofar as a need might arise to close off the runaway for safety reasons; and

d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the Manchester Airport Byelaws 2024.

The threats

24. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:

25. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations…"

26. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").

27. 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.

28. Since that 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?"*

29. 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?"

30. 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****.*
>
> *…"*

31. 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/tZIoduqpqTMtE9dgMMhlaymvEZgO45jgJ19A)*
>
> *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,*
>
> *Just Stop Oil"*

[1] As of 27 June 2024, £24,099 had been raised on this website.

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

33. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at Stansted Airport, in one of the Third Party Areas (an area which is subject to an occupational arrangement with a third party), as part of a series of protests on climate change. This included:

    a. an individual using an angle grinder to cut a hole in the perimeter fence of the airport;

    b. two individuals trespassing the perimeter fence; and

    c. spray painting two aircrafts orange using a fire extinguisher.

34. As a result of this direct action:

    a. Notwithstanding that the protest took place on a Third Party Area, it was necessary to suspend operations on the runway on the Fourth Claimant's retained land in Stansted Airport for approximately 50 minutes: three aircraft departures were affected.

    b. the two individuals (known as Jenifer Kowalski and Cole Macdonald) were arrested and charged with causing criminal damage, aggravated trespass and interference with the use or operation of national infrastructure.

35. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for Manchester Airport, Stansted Airport and/or East Midlands Airport:

    a. trespass on the Airport and/or

    b. by protest conducted on or from the Third Party Areas, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or

    c. by protest conducted on or from the highways on Plan 1A, obstruct those occasioning particular damage to the First, Second and Third Claimants and/or interfere with the First, Second and Third Claimants' right of access

to Manchester Airport via those highways, so as to cause a nuisance actionable by the First, Second and Third Claimants.

36. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.

37. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:

    a. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.

    b. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive — by which point harm may already have occurred.

    c. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.

    d. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many tens or hundreds of millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the

flight to be delayed and/or the aircraft to be taken out of service for inspection.

e. The airports in the present case are all the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the Claimants are fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the Byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at Stansted Airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.

f. Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.

g. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND THE FIRST, SECOND AND THIRD CLAIMANTS CLAIM AGAINST THE FIRST DEFENDANT:

(1) Subject to periodic review by the Court on application by the Claimants at intervals not exceeding 24 months or such other period as the Court may determine, an order that the First Defendants must not, without the consent of the First, Second and

Third Claimants (or either of them), enter, occupy or remain upon the land outlined in red on Plan 1.

AND THE FOURTH CLAIMANT CLAIMS AS AGAINST THE SECOND DEFENDANT:

(2) Subject to periodic review by the Court on application by the Claimants at intervals not exceeding 24 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent of the Claimants, enter, occupy or remain upon the land outlined in red on Plan 2.

AND THE FIFTH CLAIMANT CLAIMS AGAINST THE THIRD DEFENDANT:

(3) Subject to periodic review by the Court on application by the Claimants at intervals not exceeding 24 months or such other period as the Court may determine, an order that the Third Defendants must not, without the consent of the Claimants, enter, occupy or remain upon the land outlined in red on Plan 3.

STATEMENT OF TRUTH

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

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

_____

~~Stuart Sherbrooke Wortley~~

~~Partner~~

Eversheds Sutherland (International) LLP

Claimants' solicitor

Title Schedule to the Particulars of Claim

1. The First Claimant is the registered proprietor of the following titles:-

Registered Title	**Freehold / Leasehold**
GM408669	Leasehold
GM724915	Leasehold
GM839013	Leasehold
MAN315638	Leasehold
CH373359	Leasehold
CH408609	Leasehold
CH408610	Leasehold
CH414019	Leasehold
CH469834	Leasehold
CH469835	Leasehold
CH593537	Leasehold
GM827720	Leasehold
GM869598	Leasehold
GM874357	Leasehold
GM874715	Leasehold
GM923439	Leasehold
MAN157825	Leasehold
MAN404429	Leasehold
MAN8976	Leasehold
MAN348640	Leasehold
MAN359310	Leasehold

2. The Second Claimant is the registered proprietor of the following titles:-

Registered Title	**Freehold / Leasehold**
GM513511	Freehold
MAN371404	Leasehold
MAN269014	Leasehold
MAN270740	Leasehold

3. The Third Claimant is the registered proprietor of the following titles:-

Registered Title	**Freehold / Leasehold**
MAN371404	Leasehold

4. The Fourth Claimant is the registered proprietor of the following titles:-

Registered Title	**Freehold / Leasehold**
EX438482	Freehold
EX574488	Freehold
EX574502	Freehold
EX574498	Freehold
EX574495	Freehold
EX574482	Freehold
EX574485	Freehold
EX574491	Freehold
EX574504	Freehold
EX574508	Freehold
EX574523	Freehold
EX948708	Freehold
EX574513	Freehold
EX640482	Freehold
EX574507	Freehold
EX574477	Freehold
EX574473	Freehold
EX438486	Freehold
AA7858	Leasehold
EX900137	Leasehold
EX976114	Leasehold

5. The Fourth Claimant also has a lease of the buildings known as 6002 and 6003 at Stansted Airport granted on 20 September 2022 and made between Airport Industrial GP Limited and Airport Industrial Nominees Limited which is unregistered and is shown coloured brown on Plan 2.

6. The Fifth Claimant is the registered owner of the following titles:-

Registered Title	**Freehold / Leasehold**
LT113826	Freehold
LT300968	Freehold
LT305941	Freehold
LT325861	Freehold
LT289774	Freehold

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

Draft Order

This exhibit appears at pages 2029 to 2063.

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Amended pursuant to the order of the Honourable Mr Justice Ritchie dated 23 July 2024

Claim Form

In the High Court of Justice Kings Bench Division	
Fee Account no.	PBA 0087211
Help with Fees - Ref no. (if applicable)	H W F – –

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.

For court use only	
Claim no.	
Issue date	

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

(1) **LEEDS BRADFORD AIRPORT LIMITED**
of Leeds LS19 7TU
(2) **LONDON LUTON AIRPORT OPERATIONS LIMITED**
of Percival House, 134 Percival Way, London Luton Airport, Luton LU2 9NU
(3) **NEWCASTLE INTERNATIONAL AIRPORT LIMITED**
of Woolsington, Newcastle Upon Tyne, NE13 8BZ
(4) **NIAL SERVICES LIMITED**
of Unit 1,Prestwick Industrial Est., Ponteland, Newcastle Upon Tyne, NE20 9DA

HIGH COURT OF JUSTICE SEAL 23 Jul 2024 QUEEN'S BENCH DIVISION

KB-2024-002317
DATE OF ISSUE
16/07/24

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

Please refer to Schedule 1 attached to the Claim Form

Brief details of claim

The Claimants seek an injunction to restrain the Defendants from acts of trespass and/or private and/or public nuisance on the land edged red on Plans 1 - 3.

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.

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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

- [x] attached
- [ ] to follow

Statement of truth

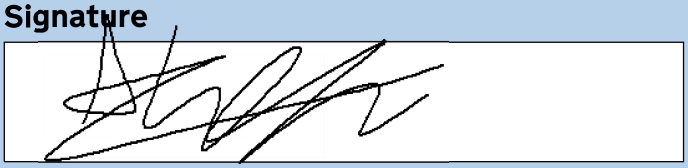
Note: you are reminded that a copy of this claim form must be served on all other parties.

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
16	0 7	2 0 2 4

Full name

Alexander James Wright

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

Principal Associate

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.

362090.000001

Email

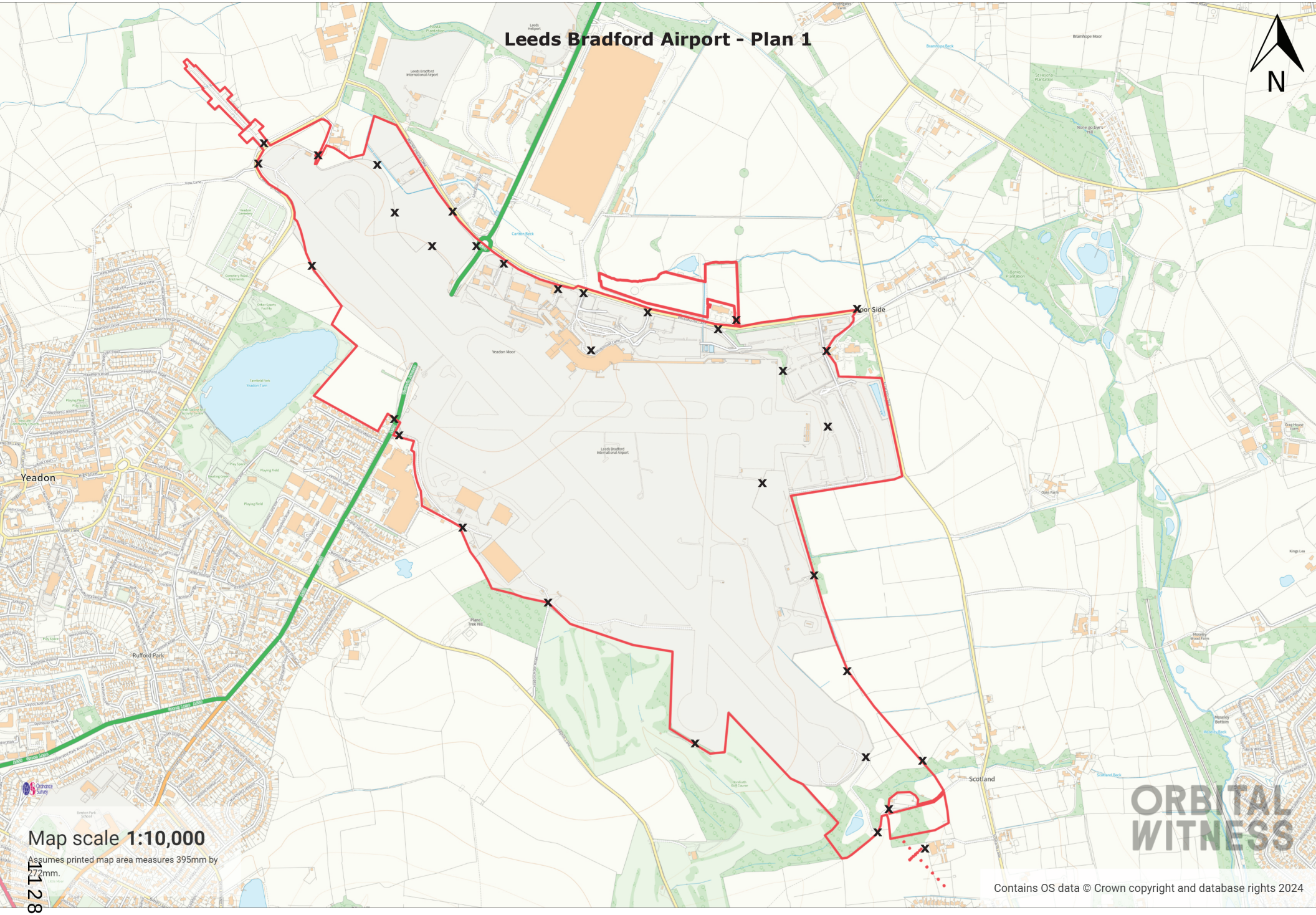
Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter

SCHEDULE 1 TO THE CLAIM FORM

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)


Leeds Bradford Airport - Plan 1
N
Yeadon
Rufford Park
Scotland
Map scale 1:10,000
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
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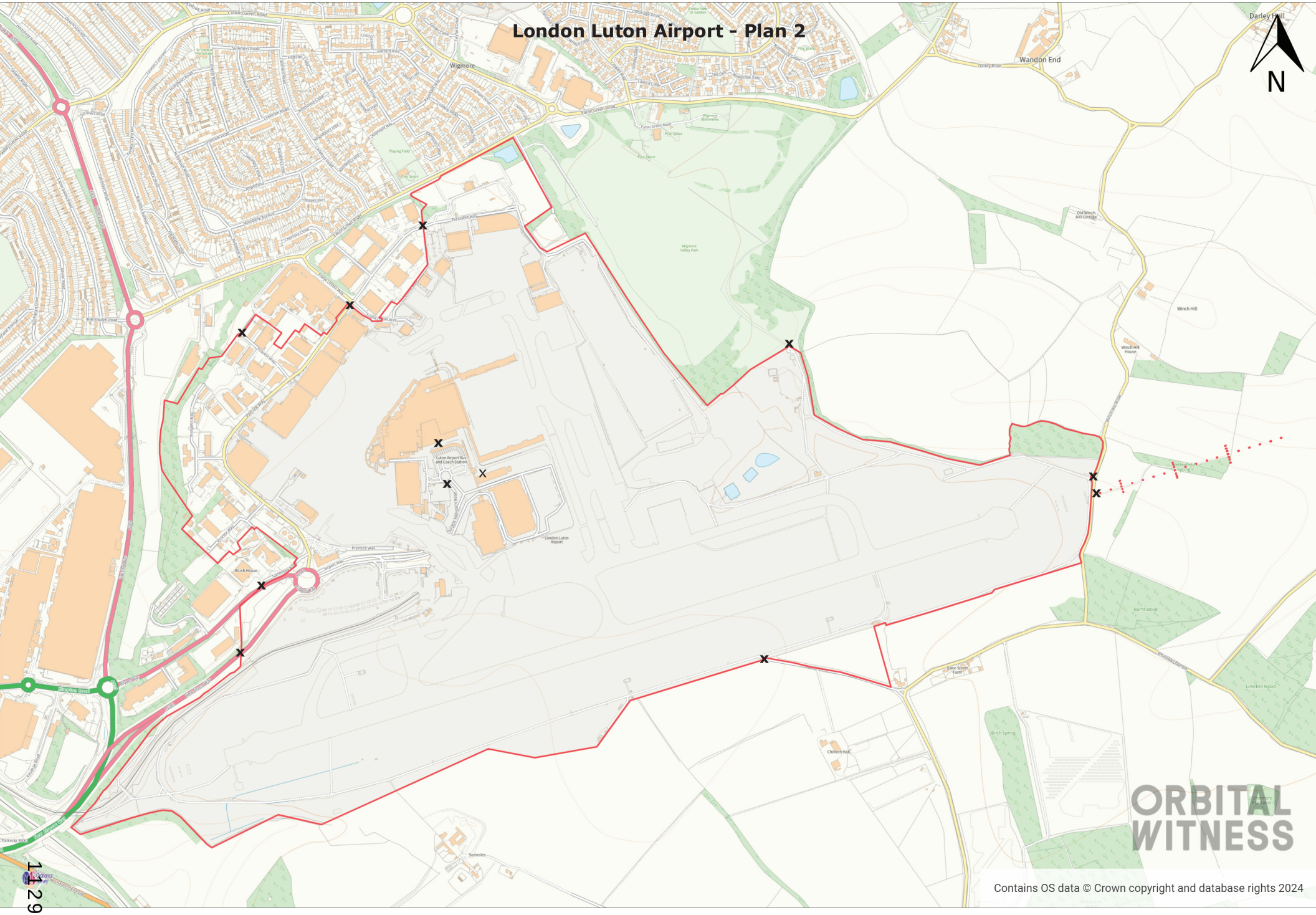
London Luton Airport - Plan 2



ORBITAL WITNESS

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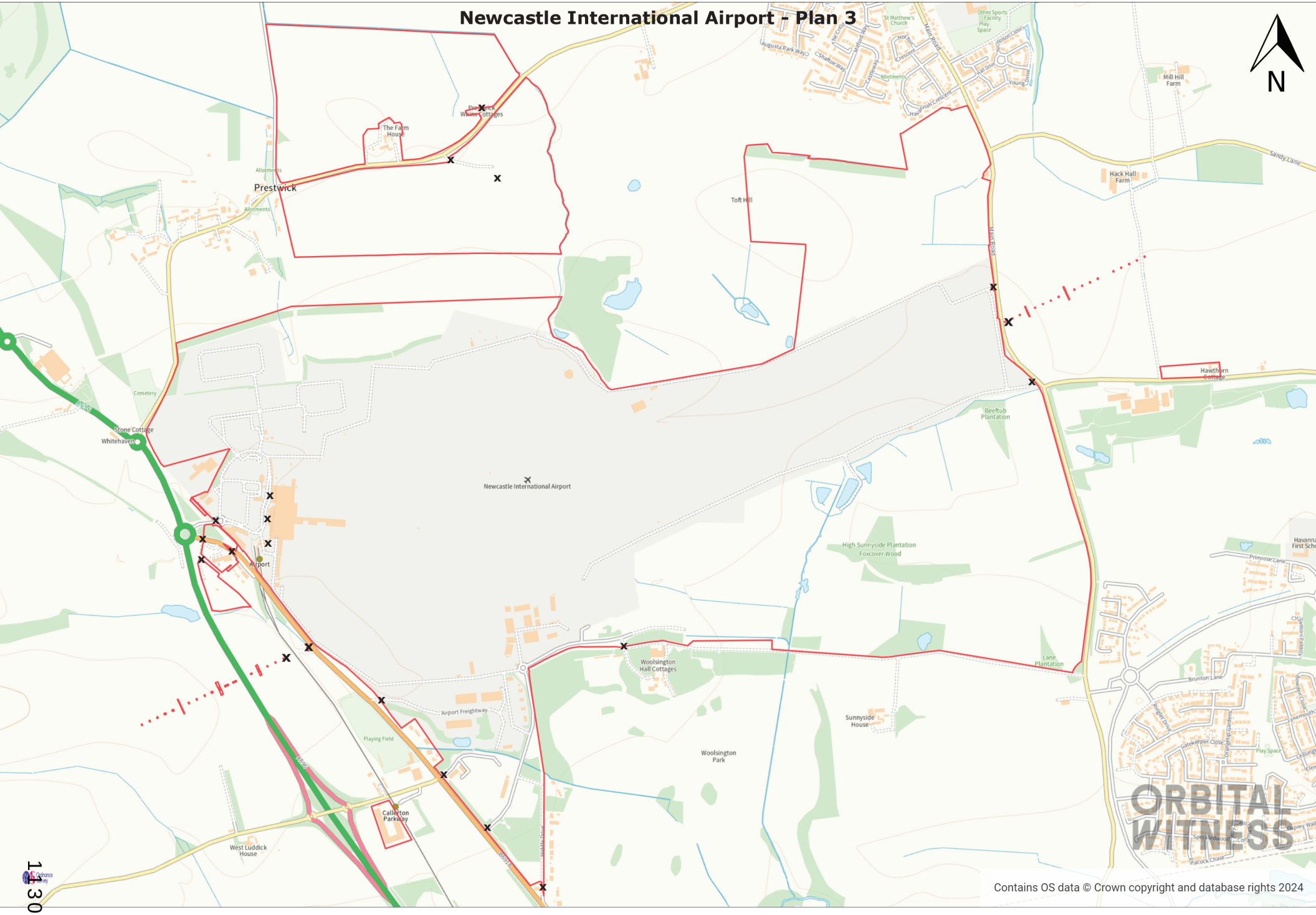
Newcastle International Airport - Plan 3



ORBITAL WITNESS

Amended pursuant to the order of the Honourable Mr Justice Ritchie dated 23 July 2024

CLAIM NO: KB – 2024 - 002317

IN THE HIGH COURT OF JUSTICE

KINGS BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

(4) NIAL SERVICES LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

AMENDED PARTICULARS OF CLAIM

PURSUANT TO THE ORDER OF THE HONOURABLE MR JUSTICE RITCHIE

DATED 23 JULY 2024

Leeds Bradford Airport

1. The First Claimant is the operator of Leeds Bradford Airport, located in Leeds, LS19 7TU, shown outlined in red on Plan 1 ("**LBA**"). LBA serves around 4 million travelling passengers each year with an annual revenue of approximately £43 million.

2. The First Claimant is the registered proprietor of the land on which LBA is situated as shown in red on Plan 1, through a mixture of freehold and leasehold interests as shown in the Title Schedule hereto — but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas and subject also to certain highways.

3. Subject to those interests, the First Claimant is entitled to an immediate right of possession occupation and control of LBA by virtue of its titles as shown in the Title Schedule.

4. Plan 1A identifies the areas within LBA over which the First Claimant lacks (or does not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests ("**the LBA Third Party Areas**") or public rights of way ("**the LBA Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First Claimant does not assert that it is the person with an immediate right of occupation or possession.

    a. The LBA Third Party Areas are indicated by blue and green shading. The blue shading indicates areas within LBA which are the subject of leases or other occupational arrangements. The green shading indicates parts of LBA which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

    b. The LBA Highways are indicated by pink and purple shading. The pink highways are located at ground level and provide access to LBA to the First Claimant and its licensees (including members of the public). The purple highway runs beneath the runway at the airport.

5. As indicated on Plan 1A, there is one area shaded in blue which directly abuts the red line on the southern boundary of LBA. At that location, the boundary of LBA is not in the possession or control of the First Claimant. Apart from that exception:

access to or from the LBA Third Party Areas by the public from outside the airport, involves the use of areas of LBA which remain unencumbered by any such arrangement and in relation to which, accordingly, the First Claimant remains entitled to possession occupation and control by virtue of their interests shown in the Title Schedule.

6. Plan 1B identifies the various interests held by the First Claimant in the land on which LBA is situated. At the south east, abutting the land shown hatched in pink registered under title WYK232726 at HM Land Registry, are landing lights ("**the LBA Landing Lights**"). Title to the land on which those lights are situate is registered in a third party's name. By an agreement dated 10 December 1982, a predecessor in title to the First Claimant was granted the right to erect and maintain landing lights in the relevant area of land. That agreement is unregistered.

7. By virtue of s63 of the Airports Act 1996, the First Claimant has power to make byelaws with respect to LBA. Pursuant to the Leeds Bradford Airport Byelaws 2022, byelaw 3.24, no person has a right to use any part of LBA as defined therein for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. The plan which defines LBA for the purposes of the byelaws does not extend in the south to the LBA Landing Lights. Apart from that, it includes all the land outlined in red on Plan 1A together with other land (shaded in yellow on Plan 1A). As at the date of commencement of this claim, the First Claimant seeks no relief in relation to the yellow land, notwithstanding that such land is within the byelaws, because the yellow land is not within the operational boundary of LBA. The First Claimant does not, however, repudiate the right to seek relief in relation to such areas, should events materialise which make that course appropriate.

London Luton Airport

8. The Second Claimant is the operator of London Luton Airport, located in Luton, LU2 9LY, shown outlined in red on Plan 2 ("**Luton Airport**"). Luton Airport serves around 16.4 million travelling passengers each year with an annual revenue of approximately £296 million.

9. The Second Claimant is the proprietor of the land on which Luton Airport is situated as shown in red on Plan 2, through the interests shown in the Title Schedule hereto—— but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

10. Subject to those interests of third parties, the Second Claimant is entitled to an immediate right of possession occupation and control of Luton Airport, by virtue of its titles as shown in the Title Schedule.

11. Plan 2A identifies the areas within Luton Airport over which the Second Claimant lacks (or does not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the Luton Third Party Areas**") or public rights of way ("**the Luton Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Second Claimant does not assert that it is the person with an immediate right of occupation or possession.

    a. The Luton Third Party Areas are indicated in black, blue and green. The black land is a Direct Air-Rail Transit ("DART") and DART station. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

    b. The Luton Highways are indicated in pink. These provide access to Luton Airport to the Second Claimant and its licensees (including members of the public).

12. As indicated on Plan 2A, certain of the Luton Third Party Areas abut the red line on the western boundary of Plan 2A. At those locations, the boundary is not in the possession or control of the Second Claimant. Subject to that: access to or from the Luton Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Luton Airport which remain unencumbered by any such arrangement and in relation to which, accordingly, the Second Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

13. Plan 2B identifies the various interests held by the Second Claimant in the land on which Luton Airport is situated. To the east of the land shown hatched green, are various landing lights some of which are situate on the land shown shaded in blue registered under title HD544934 at HM Land Registry (which the Second Claimant has a proprietary interest in). The remainder of the landing lights are shown in red but are not situate on the land shaded in blue ("**the Luton Landing Lights**"). Title

to the land on which the Luton Landing Lights are situate is registered in a third party's name. The Second Claimant does not assert paper title to the land on which the Luton Landing Lights are situated. However, the Second Claimant has exclusive possession of the land in question by virtue of the installation of the lights, without consent from any person, and which have been in that location for around 20 years.

14. By virtue of s63 of the Airports Act 1996, the Second Claimant has power to make byelaws with respect to Luton Airport. Pursuant to the London Luton Airport Byelaws 2005, byelaw 2.16, no person has a right to use any part of Luton Airport for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the Luton Landing Lights, the plan which defines Luton Airport for the purposes of the byelaws includes all the land outlined in red on Plan 2A.

Newcastle Airport

15. The Third Claimant is the operator of Newcastle International Airport, located in Woolsington, Newcastle upon Tyne, NE13 8BZ, shown outlined in red on Plan 3 ("**Newcastle Airport**"). Newcastle Airport serves around 5 million travelling passengers each year with an annual revenue of approximately £65 million.

16. The Third and Fourth Claimants are the proprietors of the land on which Newcastle Airport is situated as shown in red on Plan 3, through the interests shown in the Title Schedule hereto—but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

17. Subject to the aforesaid interests of third parties, the Third and Fourth Claimants are entitled to an immediate right of possession occupation and control of Newcastle Airport, by virtue of its titles as shown in the Title Schedule and the agreements dated 21 January 2005; 4 May 2023; 20 October 1999; and 31 August 2020.

18. Plan 3A identifies the areas within Newcastle Airport over which the Third and Fourth Claimants lack (or do not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the Newcastle Third Party Areas**") or public rights of way ("**the Newcastle Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Third and Fourth Claimants do not assert that they are the person with an immediate right of occupation or possession.

a. The Newcastle Third Party Areas are indicated in black, blue and green. The black land is a railway station. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

b. The Newcastle Highways are indicated in pink. These provide access to Newcastle Airport to the Third and Fourth Claimants and their licensees (including members of the public).

19. As indicated on Plan 3A, parts of the Newcastle Third Party Areas, being those areas shaded in blue which abut the red line at the north of Plan 3A and on the eastern and western boundary of Plan 3A. At those locations, the boundary is not in the possession or control of the Third and/or Fourth Claimants. Subject to that: access to or from the Newcastle Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Newcastle Airport which remain unencumbered by any such arrangement and in relation to which, accordingly, the Third and Fourth Claimant remain entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

20. Plan 3B identifies the Third and Fourth Claimants' various registered interests in the land on which Newcastle Airport is situated. On the western and eastern boundaries of the land registered under title number TY433695 at HM Land Registry, are landing lights ("**the Newcastle Landing Lights**"). Title to the land on which those lights are situate is registered in a third party's name. By agreements dated 21 January 2005; 4 May 2023; 20 October 1999; and 31 August 2020, the Third Claimant was granted rights to erect and maintain landing lights in the relevant areas of land. Such rights or interests thereby granted are unregistered.

21. By virtue of s63 of the Airports Act 1996, the Third Claimant has power to make byelaws with respect to Newcastle Airport. Pursuant to the Newcastle Airport Byelaws 2021, byelaw 4.12 and 4.18, no person has a right to use any part of Newcastle Airport for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the Newcastle Landing Lights, the plan which defines Newcastle Airport for the purposes of the byelaws includes all the land outlined in red on Plan 3A.

The Claimants' claims

22. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management/ airline facilities, and (save at LBA) a railway station.

23. In relation to each airport:

    a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).

    b. No wider consent subsists; and (subject to the highways described above) no public right of access, or way, subsists over the airports.

    c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.

    d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

24. In relation to the Third Party Areas at each airport:

    a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the Court to make an order which does not distinguish between the airports generally (as

shown outlined in red on the various plans) and the Third Party Areas within them;

b. Further or alternatively, protest which occurs on the Third Party Areas interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.

25. In relation to the landing lights:

a. For the LBA Landing Lights and/or the Newcastle Landing Lights, paragraph 23 above applies mutatis mutandis.

b. Alternatively and/or in respect of the LBA Landing Lights and/or the Luton Landing Lights and/or the Newcastle Landing Lights, paragraph 24a above applies mutatis mutandis and/or protest which occurs on the land on which the lights are situate interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the First and/or Second and/or Third Claimants' land, insofar as a need might arise to close off the runway for safety reasons in the event that the landing lights became compromised or threatened.

26. Further, in respect of the LBA Highways, the Luton Highways and the Newcastle Highways described above: protest which occurs on these highways interferes and/or threatens to interfere:

a. Unreasonably and substantially, with the Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;

b. Unreasonably and substantially, with (and/or to obstruct or hinder) the free passage along the highway, occasioning particular damage to the Claimants; and

c. Further, in respect of the tunnelled highway in pink on Plan 1A, unreasonably and substantially, with the First Claimant's ordinary use and enjoyment of LBA, insofar as a need might arise to close off the runway for safety reasons; and

d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the byelaws.

The threats

27. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:

28. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations…"

29. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").

30. 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.

31. Since that 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?"*

32. 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?"

33. 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**.*

…"

34. 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/tZIoduqpqTMtE9dgMMhlaymvEZgO45jgJ19A)

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.

[1] As of 11 July 2024, £24,275 had been raised on this website.

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,

Just Stop Oil"

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

36. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at London Stansted Airport (in an area which is subject to an occupational arrangement with a third party), as part of a series of protests on climate change. This included:

    a. an individual using an angle grinder to cut a hole in the perimeter fence of the airport;

    b. two individuals trespassing the perimeter fence; and

    c. spray painting two aircrafts orange using a fire extinguisher.

37. As a result of this direct action:

    a. It was necessary to suspend operations on the runway at Stansted Airport for approximately 50 minutes: three aircraft departures were affected.

    b. the two individuals (known as Jenifer Kowalski and Cole Macdonald) were arrested and charged with causing criminal damage, aggravated trespass and interference with the use or operation of national infrastructure.

38. Further, in respect of LBA and Luton Airport:

    a. in the period between 2019 and 2022, Extinction Rebellion repeatedly carried out protests about the planned expansion of LBA, including on highways and/or accessways to LBA. In September 2023, the First Claimant commenced construction works at LBA in order to expand the airport.

    b. in the period between 2020 and 30 May 2024, various environmental protest groups carried out protests against the expansion of Luton Airport.

39. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for LBA, Luton Airport and/or Newcastle Airport

    a. trespass on the airports and/or

    b. by protest conducted on or from the Third Party Areas and/or on or from the land on which the LBA Landing Lights, Luton Landing Lights and/or Newcastle Landing Lights are situate, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or

    c. by protest conducted on or from the highways, obstruct those occasioning particular damage to the Claimants and/or interfere with the Claimants' right of access to the airports via those highways, so as to cause a nuisance actionable by the Claimants.

40. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.

41. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:

42. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.

43. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive — by which point harm may already have occurred.

44. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.

45. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.

46. The airports in the present case are all the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the Claimants are fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the Byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at Stansted Airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.

47. Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.

48. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND THE FIRST CLAIMANT CLAIMS AGAINST THE FIRST DEFENDANT:

(1) Subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months or such other period as the Court may determine, an order that the First Defendants must not, without the consent of the First Claimant enter, occupy or remain upon the land outlined in red on Plan 1.

AND THE SECOND CLAIMANT CLAIMS AS AGAINST THE SECOND DEFENDANT:

(2) Subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent of the Second Claimant, enter, occupy or remain upon the land outlined in red on Plan 2.

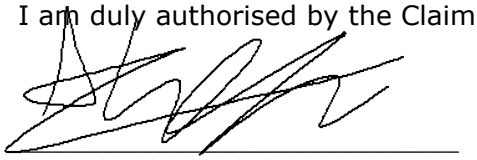
AND THE THIRD AND FOURTH CLAIMANTS CLAIM AGAINST THE THIRD DEFENDANT:

(3) Subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Third Defendants must not, without the consent of the Third and Fourth Claimants (or either of them), enter, occupy or remain upon the land outlined in red on Plan 3.

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.



Alexander James Wright

Principal Associate

Eversheds Sutherland (International) LLP

Claimants' solicitor

Dated: ~~16~~ 23 July 2024

TITLE SCHEDULE TO THE PARTICULARS OF CLAIM

1. The First Claimant is the registered proprietor of the following titles:-

Title number	Freehold / Leasehold
WYK232726	Freehold
WYK269721	Freehold
WYK275282	Freehold
WYK461796	Freehold
WYK500833	Freehold
WYK500834	Freehold
WYK512407	Freehold
WYK547070	Freehold
WYK547071	Freehold
WYK570873	Freehold
WYK574741	Freehold
WYK624715	Freehold
WYK657177	Freehold
WYK657180	Freehold
WYK698270	Freehold
WYK698436	Freehold
WYK706576	Freehold
WYK775942	Freehold
WYK723309	Freehold
WYK806314	Freehold
WYK831477	Freehold
WYK857105	Freehold
WYK857106	Freehold
WYK395678	Freehold
WYK657178	Leasehold
WYK501284	Leasehold

2. The Second Claimant is the registered proprietor of the following titles:-

Title number	Freehold / Leasehold
BD235078	Leasehold
BD206048	Leasehold
BD339131	Leasehold
BD332840	Leasehold
BD216008	Leasehold
HD544934	Leasehold

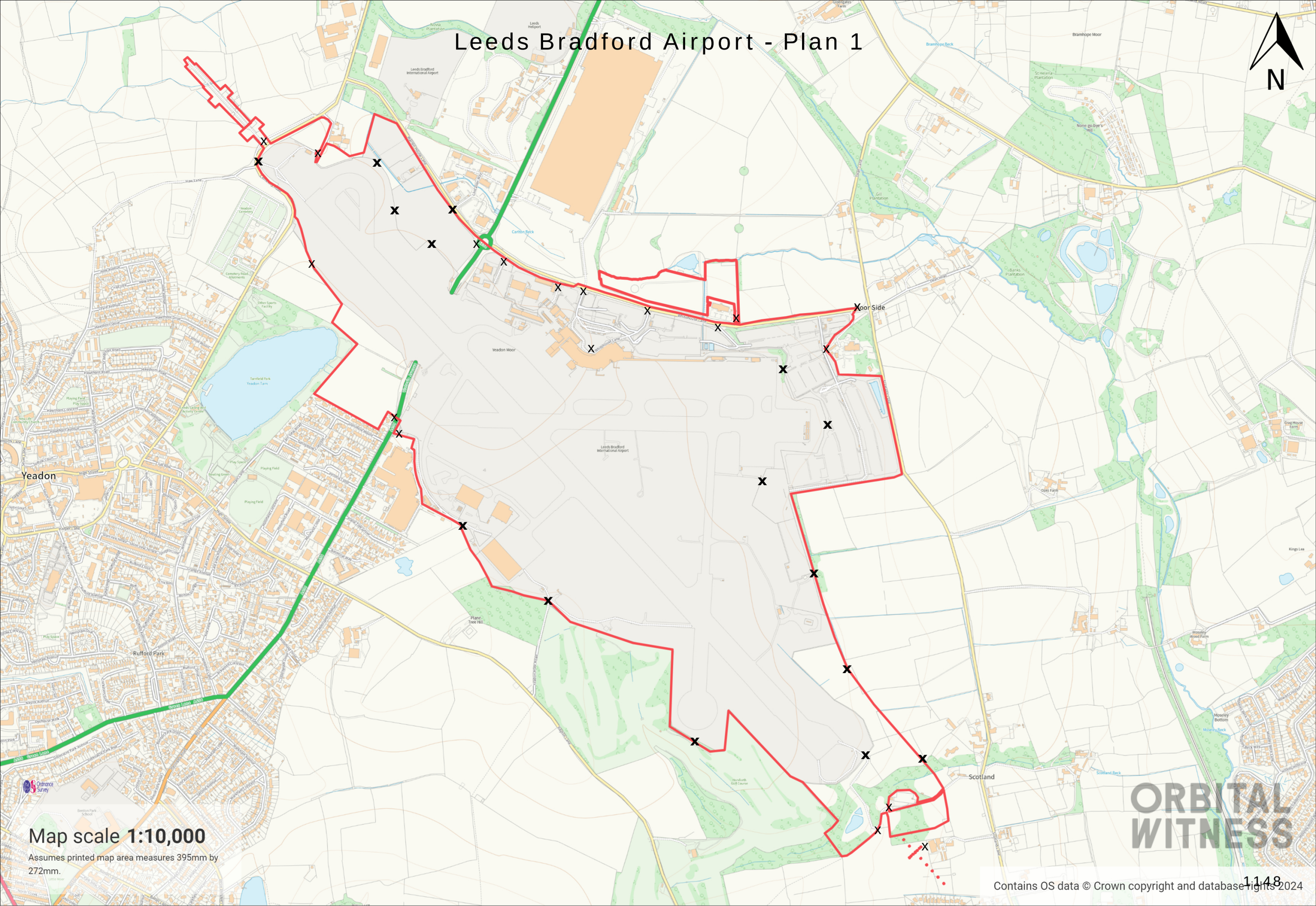
3. The Third Claimant is the registered proprietor of the following titles:-

Title number	Freehold / Leasehold
TY349352	Freehold
TY476495	Freehold
TY433695	Freehold

5. The Fourth Claimant is the registered proprietor of the following title:-

Title number	Freehold / Leasehold
ND75730	Freehold

Leeds Bradford Airport - Plan 1



Map scale **1:10,000**

Assumes printed map area measures 395mm by 272mm.

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London Luton Airport - Plan 2



ORBITAL WITNESS

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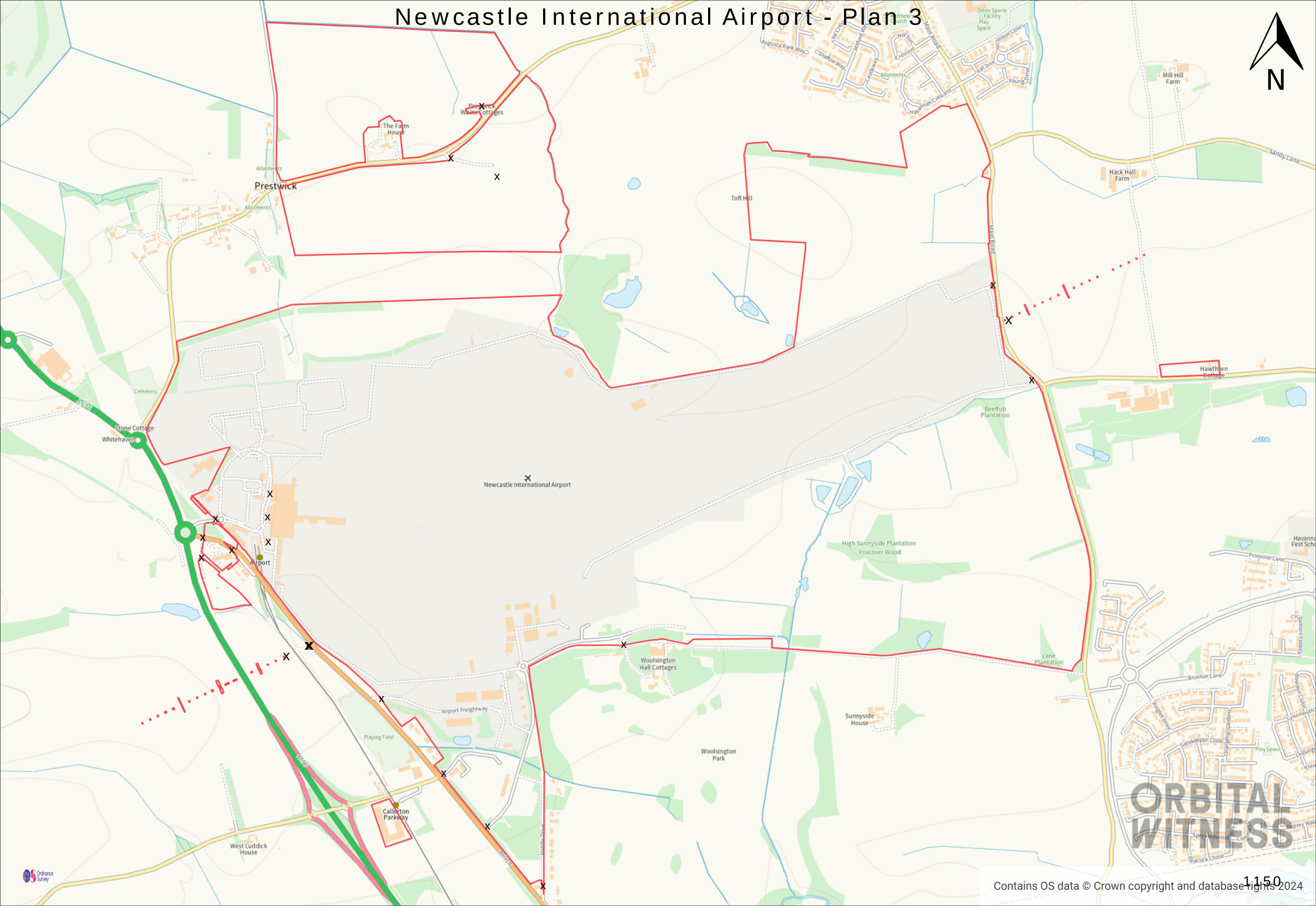
Newcastle International Airport - Plan 3



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Leeds Bradford Airport - Plan 1A

- Injunction
- Wholly Third Party Areas
- Partly Third Party Aras
- Deviation from LBA Byalaw plan
- Public Highway - ground level
- Public highway - underground

N

ORBITAL WITNESS

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London Luton Airport - Plan 2A

- Injunction
- Wholly Third Party Areas
- Partly Third Party Areas
- Public Highways
- Luton DART

N

ORBITAL WITNESS

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Newcastle International Airport - Plan 3A

- Injunction
- Wholly Third Party Areas
- Partly Third Party Areas
- Public Highways
- Underground Metro Station

N

ORBITAL WITNESS

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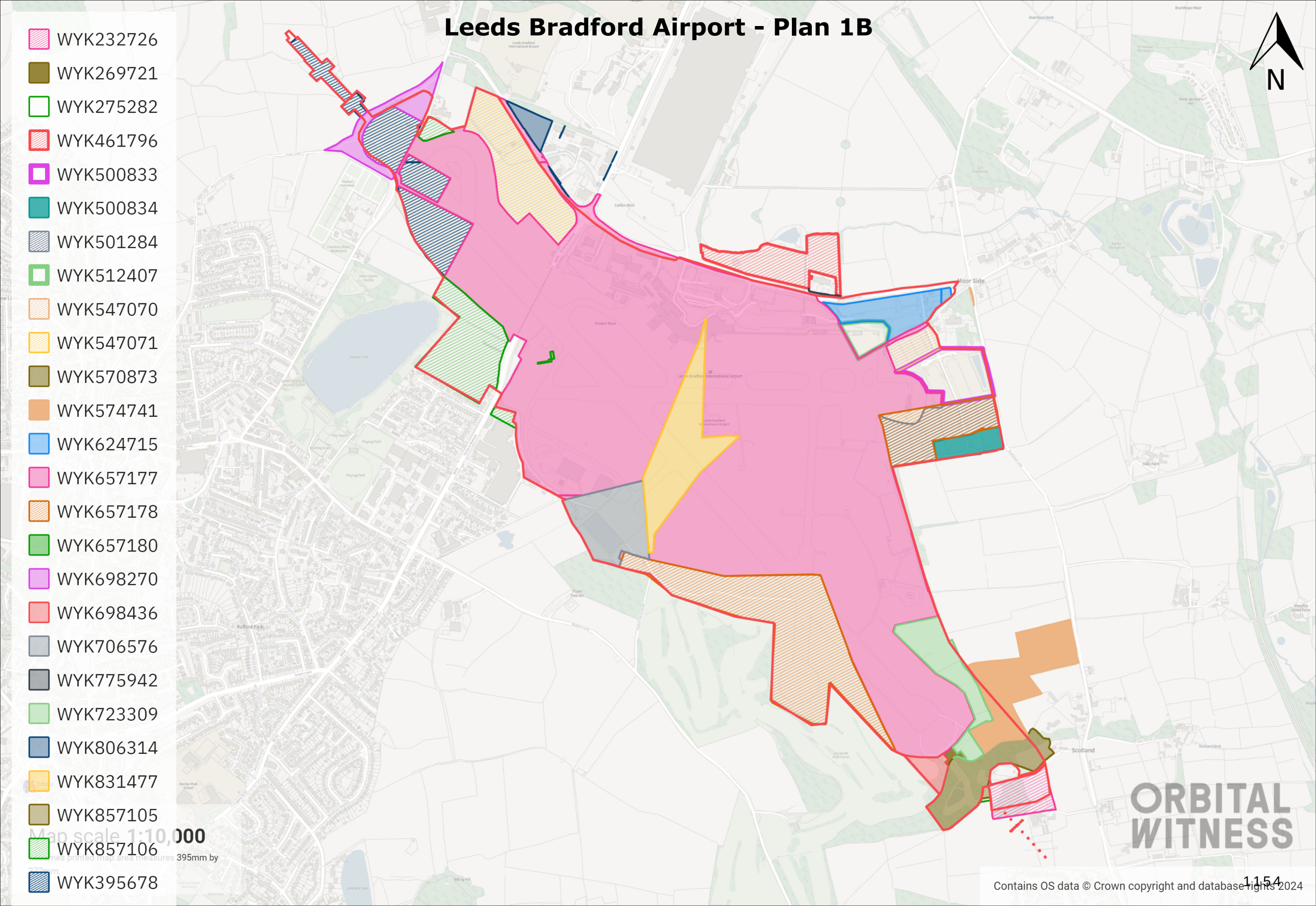
Leeds Bradford Airport - Plan 1B



London Luton Airport - Plan 2B

- HD544934
- BD216008
- BD206048
- BD235078
- BD332840
- BD339131
- Transfer 29.02.24

N

ORBITAL WITNESS

1:155

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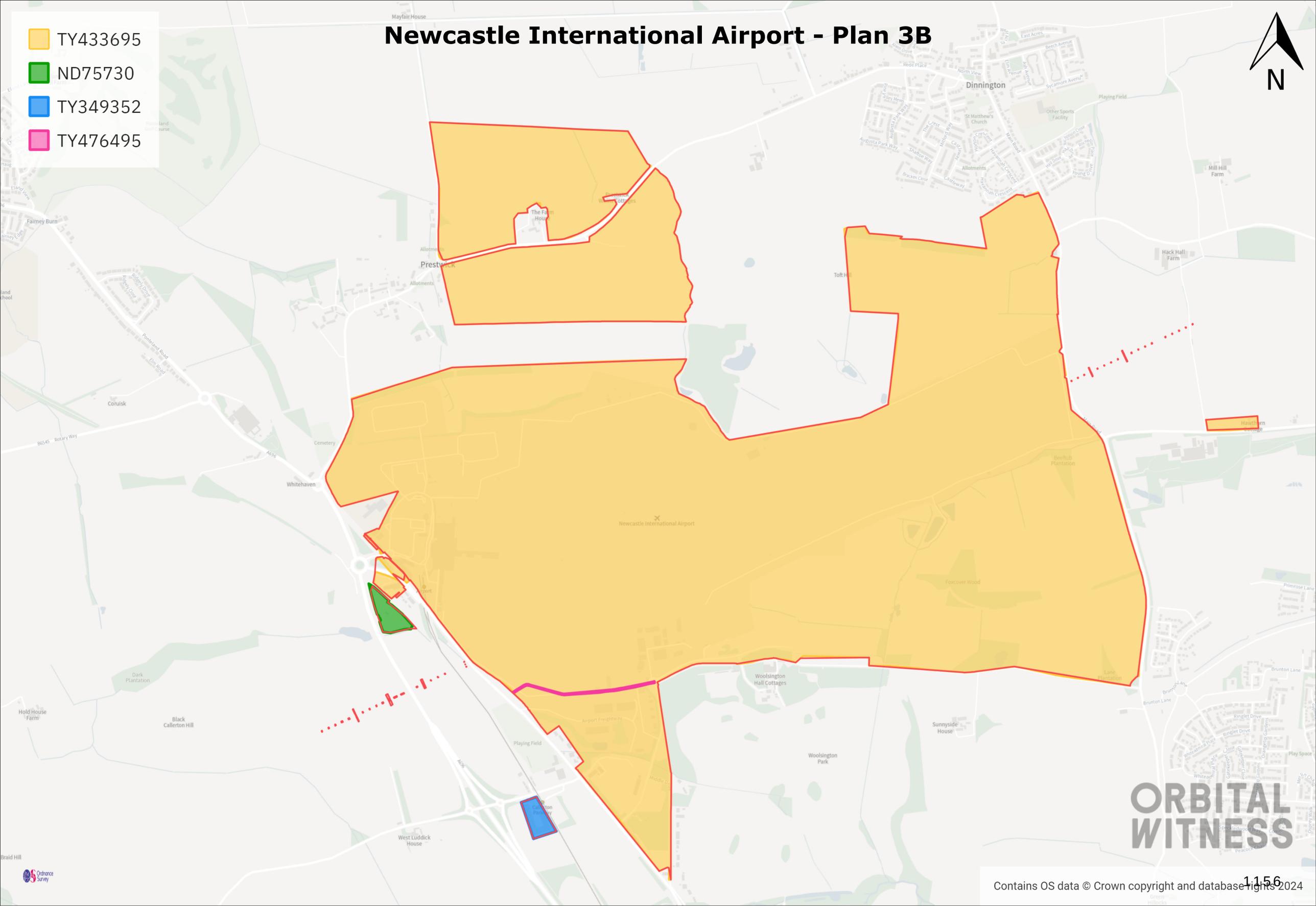
Newcastle International Airport - Plan 3B

TY433695
ND75730
TY349352
TY476495

N



ORBITAL WITNESS

1:156

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Schedule 1 ~~3~~ Plan Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-



(1) LEEDS BRADFORD AIRPORT LIMITED

AND THREE OTHERS

Claimants

- v -

KB-2024-002317

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex-parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the first witness statements: of Alexander James Wright dated 16 July 2024, 17 July 2024, (another) 17 July 2024; and 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden, Counsel for the Claimants and no one attending for the Defendants.

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

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to protestrequest@lba.co.uk.

DEFINITIONS

"**Leeds Bradford Airport**" means the land shown in red outlined in red on Plan 1 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

https://www.leedsbradfordairport.co.uk/injunction. at which copies of this Order may be viewed and downloaded).

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the First Defendant:

    a. Uploading a copy onto the following website: https://www.leedsbradfordairport.co.uk/injunction.

    b. Sending an email to each of the email addresses listed in Schedule 3 to this Order (1) stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and (2) attaching this Order.

    c. Affixing a notice at those locations marked with an "X" on Plan 1 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form of Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraph 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.

6. The Court will provide sealed copies of this Order to the First Claimant's solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3 and 4. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the First Defendant of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone 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 First Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.

13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE FIRST CLAIMANT

The First Claimant's solicitors and their contact details are:

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

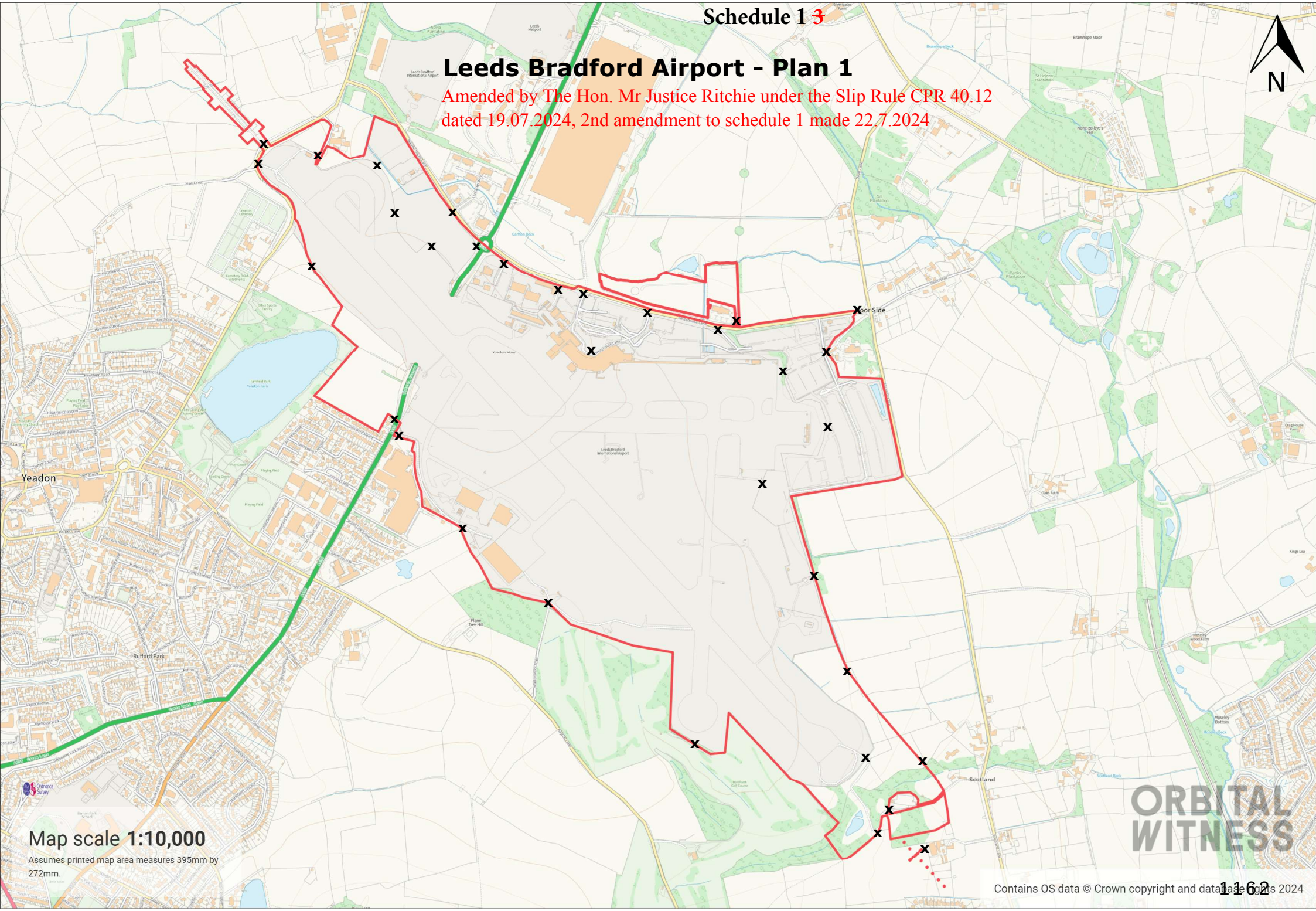
(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

Schedule 1 ~~3~~

Leeds Bradford Airport - Plan 1

Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12
dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant will take steps to serve the First Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The First Claimant 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Leeds Bradford Airport Limited (the "**First Claimant**")

This notice relates to the land known as Leeds Bradford Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

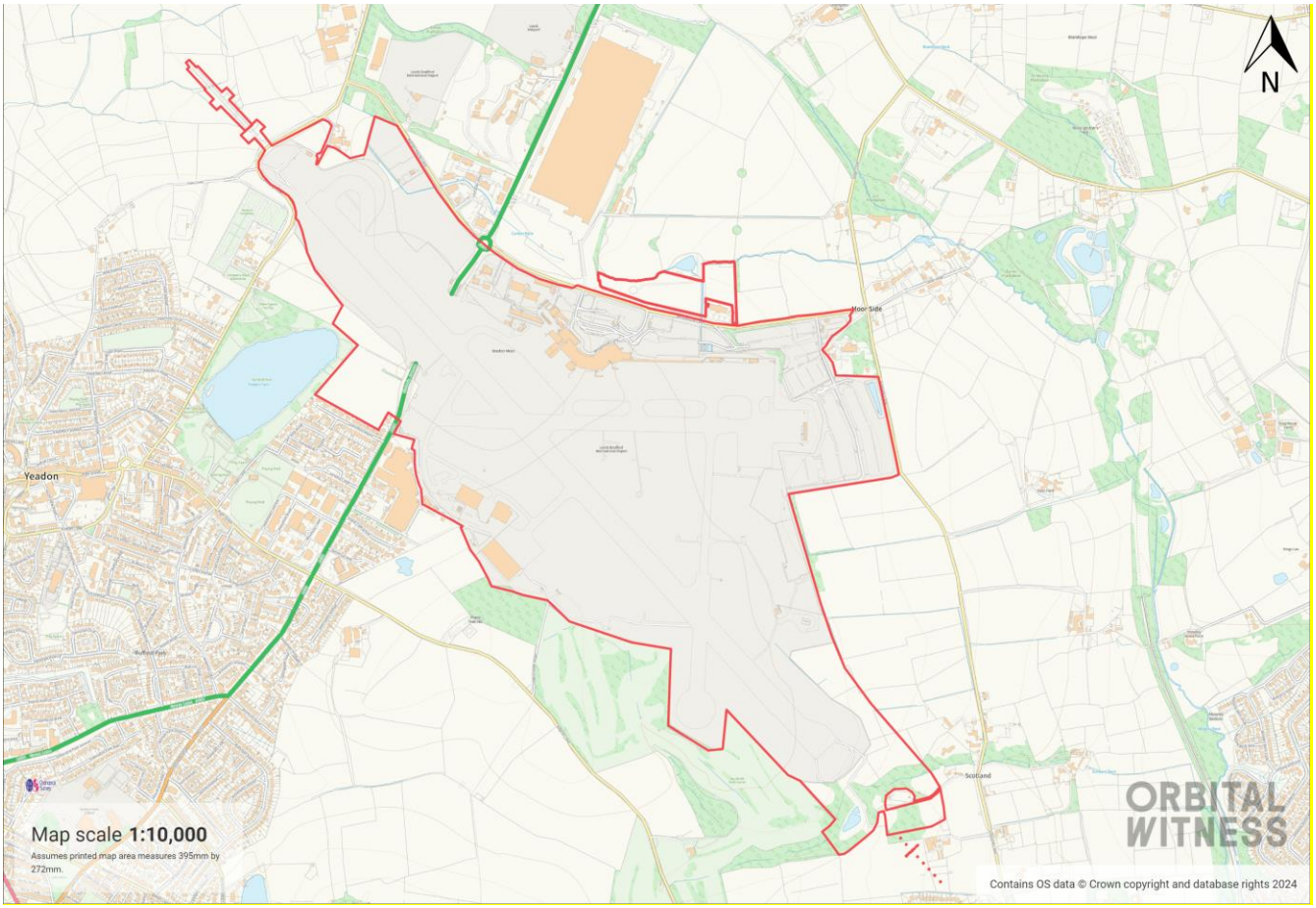
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: https://www.leedsbradfordairport.co.uk/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.


N
Yeadon
Moor Side
Scotland
Map scale 1:10,000
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
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CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

AND THREE OTHERS



Claimants

- v -

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 19 July 2024.

UPON the Claimants' claim by the Claim Form issued on 16 July 2024.

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, dated 17 July 2024, (and another) 17 July 2024 and dated 18 July 2024; Vincent Hodder dated 15 July 2024; Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants.

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

AND UPON the Second Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London Luton Airport, as defined by this Order, should be made by email to protestrequest@ltn.aero.

DEFINITIONS

"**London Luton Airport**" means the land shown in red outlined in red on Plan 2 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.london-luton.co.uk/corporate/lla-publications/injunction at which copies of this Order may be viewed and downloaded.

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of London Luton Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.

2. This Order is subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Second Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the Second Defendant:

    a. Uploading a copy onto the following website: https://www.london-luton.co.uk/corporate/lla-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 and attaching this Order.

    c. Affixing a notice at those locations marked with an "X" on Plan 2 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the Second Defendant and each of them.

6. The Court will provide sealed copies of this Order to the Second Claimant's solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the Second Defendant of any further applications or documents in the proceedings by the Second Claimant shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone 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 Second Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Second Claimant's solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second Claimant's solicitors.

13. The Second Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE SECOND CLAIMANT

The Second Claimant's solicitors and their contact details are:

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

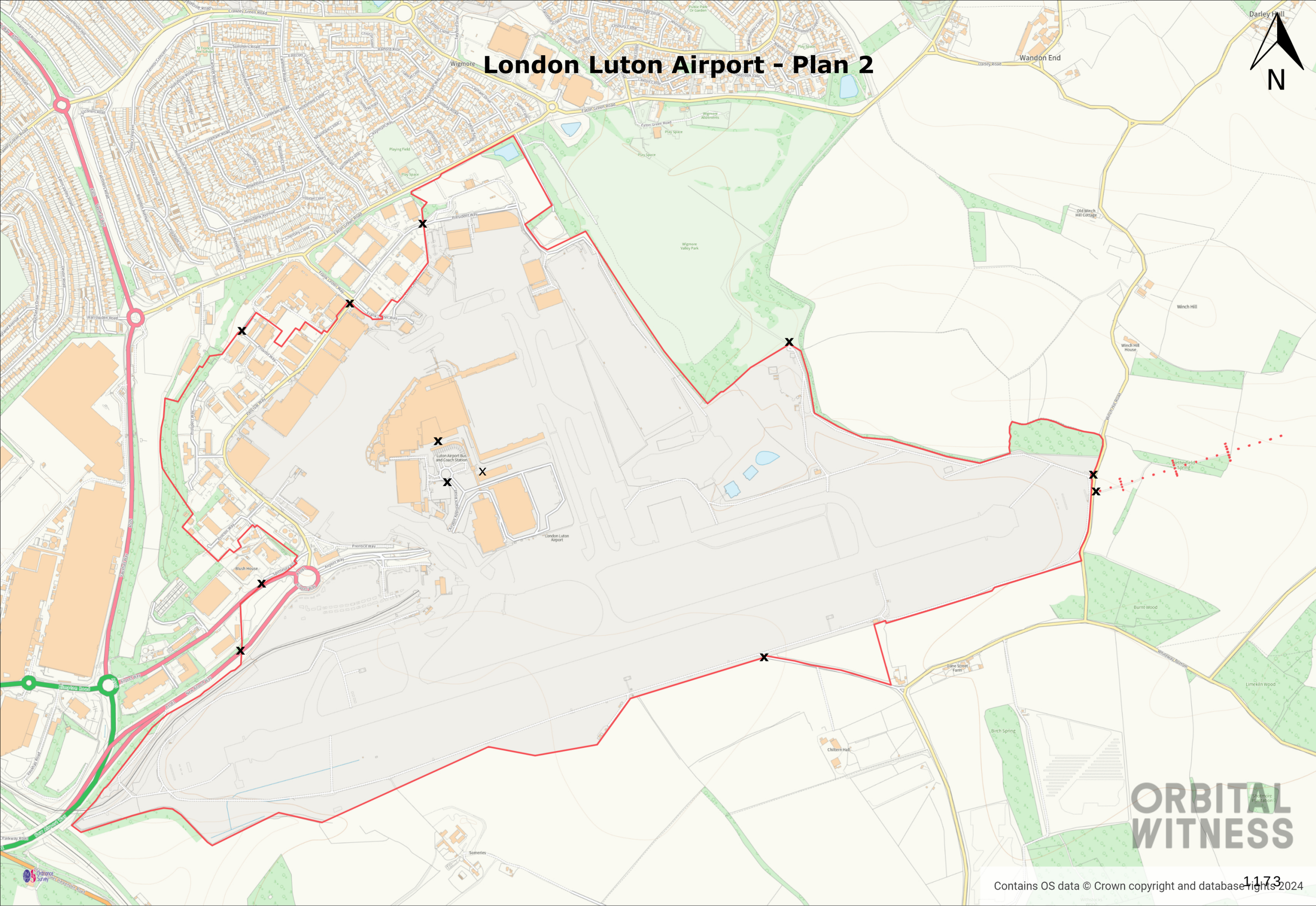
07712 881 393

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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

London Luton Airport - Plan 2



ORBITAL WITNESS

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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND CLAIMANT

(1) The Second Claimant will take steps to serve the Second Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The Second Claimant 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: London Luton Airport Operations Limited (the "**Second Claimant**")

This notice relates to the land known as London Luton Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.

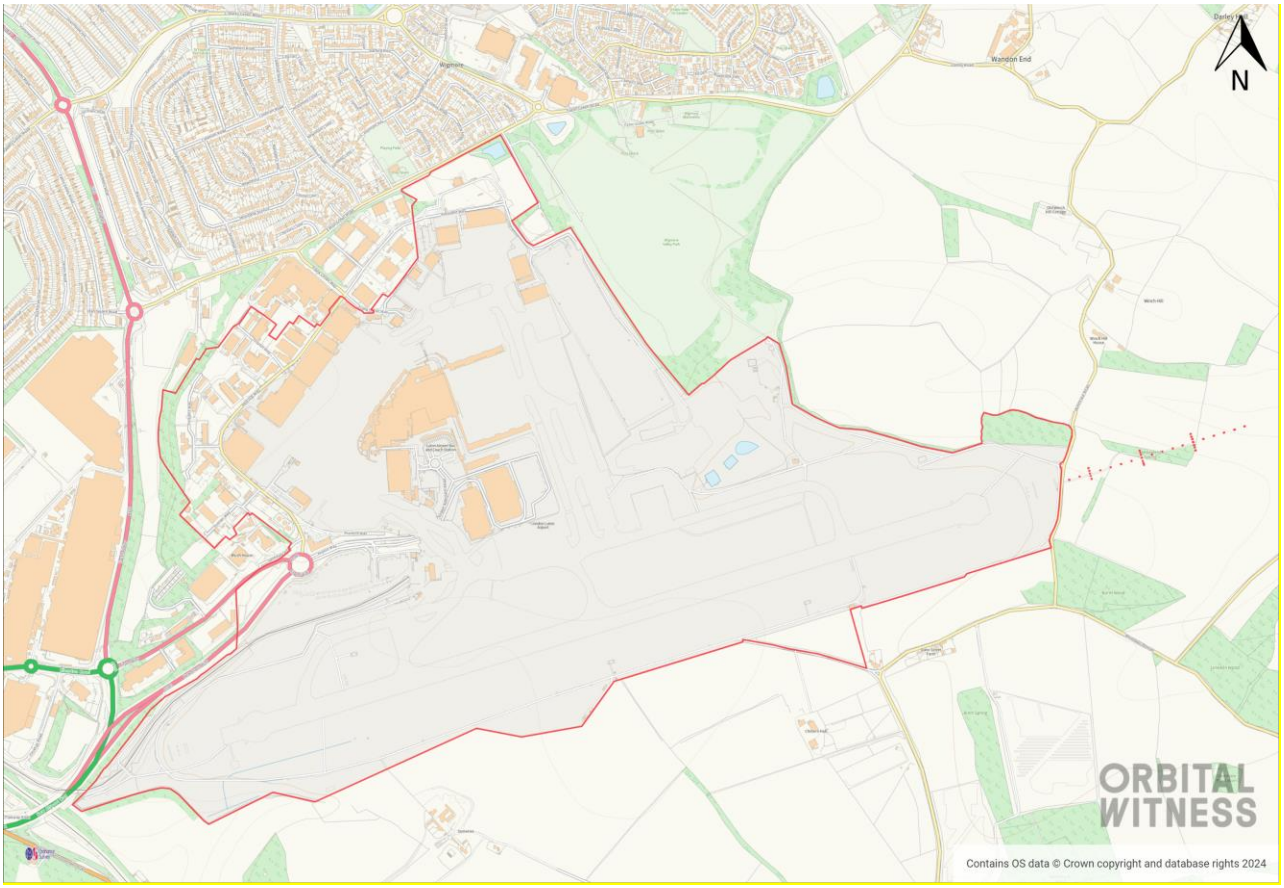
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Second Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: https://www.london-luton.co.uk/corporate/lla-publications/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.


N
Wandon End
ORBITAL
WITNESS
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CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-



(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

AND TWO OTHERS

Claimants

- v -

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE The Honourable Mr Justice Ritchie on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, 17 July 2024, (and another) 17 July 2024, dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants

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

AND UPON the Third and Fourth Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Newcastle International Airport, as defined by this Order, should be made by email to protestrequest@newcastleinternational.co.uk

DEFINITIONS

"**Newcastle International Airport**" means the land shown in red outlined in red on Plan 3 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.newcastleairport.com/about-your-airport/airport-company/injunction/ at which copies of this Order may be viewed and downloaded).

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Newcastle International Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants (or either of them).

2. This Order is subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Third and Fourth Claimants shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the Third Defendant:

    a. Uploading a copy onto the following website: https://www.newcastleairport.com/about-your-airport/airport-company/injunction/

    b. Sending an email with this Order attached 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. Affixing a notice at those locations marked with an "X" on Plan 3 setting out where these documents can be found and obtained in hard copy in the form of Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraph 3 shall be good and sufficient service of this Order and of the Claim Documents upon the Third Defendant and each of them.

6. The Court will provide sealed copies of this Order to the Third and Fourth Claimants' solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraphs 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the Third Defendant of any further applications or documents in the proceedings by the Third and Fourth Claimants shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone 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 Third and Fourth Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Third and Fourth Claimants' solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Third and Fourth Claimants' solicitors.

13. The Third and Fourth Claimants (or either of them) have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19.7.2024

COMMUNICATIONS WITH THE THIRD AND FOURTH CLAIMANTS

The Third and Fourth 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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Newcastle International Airport - Plan 3



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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE THIRD AND FOURTH CLAIMANTS

(1) The Third and Fourth Claimants will take steps to serve the Third Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The Third and Fourth 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Newcastle International Airport Limited and NIAL Services Limited (the "**Third and Fourth Claimants**")

This notice relates to the land known as Newcastle International Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants.

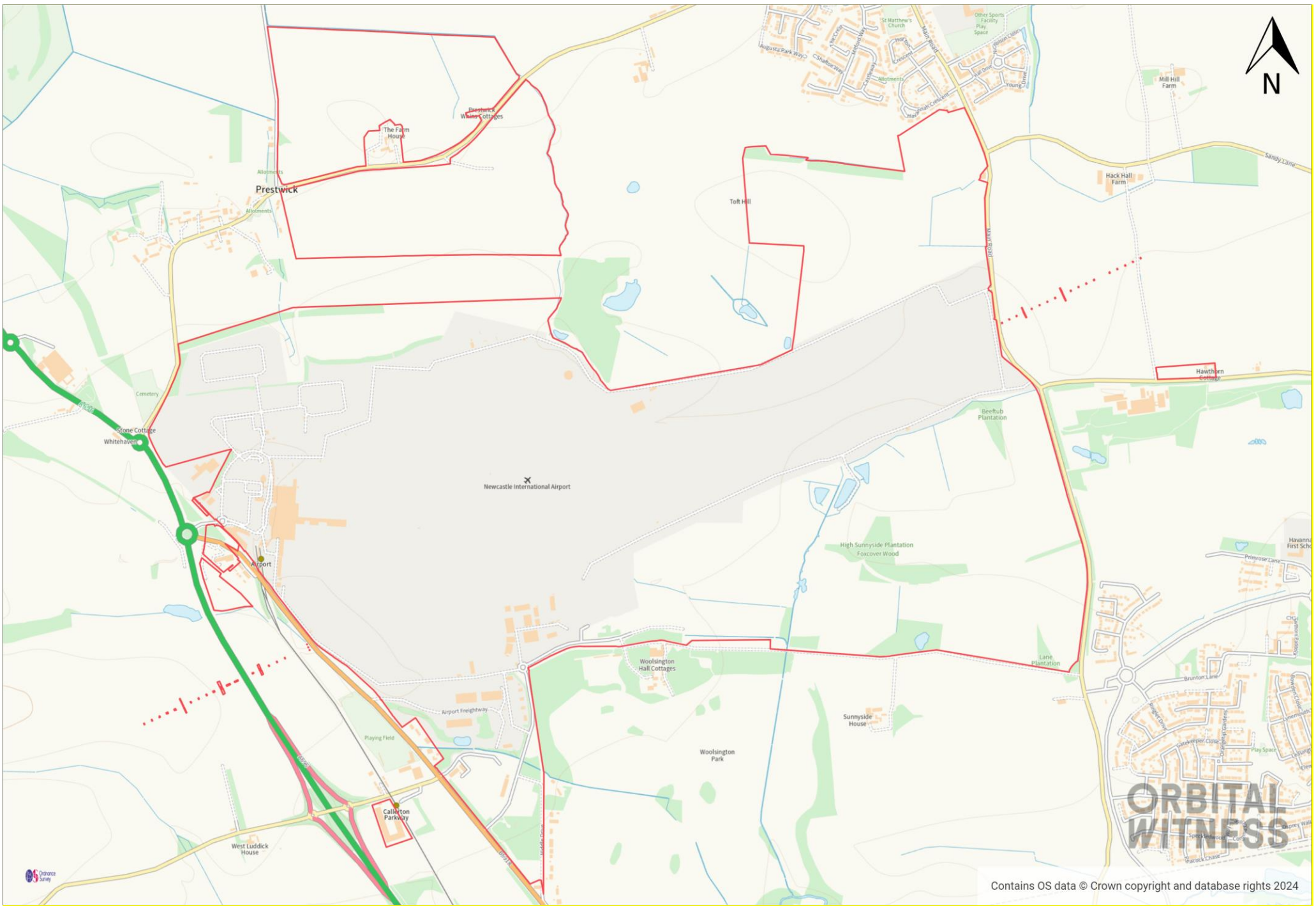
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Third and Fourth Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at:
https://www.newcastleairport.com/about-your-airport/airport-company/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE



BETWEEN:-

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(3) **PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)**

Defendants

ORDER

BEFORE: THE HONOURABLE MR JUSTICE RITCHIE sitting at the Royal Courts of Justice on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024.

AND UPON the Claimants' application for an injunction dated 16 July 2024 ("**the Application**").

AND UPON READING the Application and the first witness statement of Alexander James Wright dated 16 July 2024, the second witness statement of Alexander James Wright dated 17 July 2024, the third witness statement of Alexander James Wright dated 17 July 2024 and the fourth witness statement of Alexander James Wright dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("the Witness Statements")

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants

AND UPON the Court granting the First Claimant an injunction on 18 July 2024 ("**the Leeds Bradford Order**") in respect of the land shown outlined in red on Plan 1 to the Claim Form ("**Leeds Bradford Airport**")

AND UPON the Court granting the Second Claimant an injunction on 18 July 2024 ("**the Luton Order**") in respect of the land shown outlined in red on Plan 2 to the Claim Form ("**Luton Airport**")

AND UPON the Court granting the Third and Fourth Claimants an injunction on 18 July 2024 ("**the Newcastle Order**") in respect of the land shown outlined in red on Plan 3 to the Claim Form ("**Newcastle Airport**")

NOW IT IS ORDERED THAT:

PERMISSION TO AMEND

1. The Claimants have permission to amend the Claim Form and Particulars of Claim relating to:

   a. The description of the Defendants;

   b. The plans attached to the claim form so as to use labelled “Plan 1”, “Plan 2” and “Plan 3”.

   c. Annexing the revised plans referred to in the particulars of claim.

   d. If so advised, by 4pm on 1 August 2024 to plead any claims against Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow.

   Ritchie J

   Made: 23.7.2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

(4) NIAL SERVICES LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

NOTE OF "WITHOUT NOTICE" HEARING BEFORE

MR JUSTICE RITCHIE

18 JULY 2024

Hearing 18.07.24

The Hearing commenced at 10.30am.

The Judge had read the evidence (except for Alex Wright w/s #2, which he took a moment to read at the start of the hearing) and the Claimant's skeleton argument, and had received the authorities bundle.

TMKC introduced the case as one under the newly described jurisdiction which has been in the Supreme Court in Wolverhampton – sui generis relief against Persons Unknown; no defendants of which Cs were aware and no steps taken to notify.

Mr Justice Ritchie was familiar with the jurisdiction having granted injunctions in favour of HS2 and Esso.

This is an emerging area of law and the principles expressed in caselaw are still in the nature of guidance and the courts are encouraged by the Supreme Court to make decisions as they unfold. The guiding principle that attracts the eye of equity is the "compelling need" which stimulates the court to intervene. The developments of the law and breaking down of headings is what is needed when compelling need is identified, and to satisfy the human rights aspect.

Preliminary Matters

TMKC explained that, because of *Wolverhampton,* this was not a without notice application in the ordinary sense, but the Cs had complied with it on a precautionary basis for the reasons set out in AW w/s #1 (HB/272-273).
TMKC addressed that the Claim Form + the Particulars of Claim needed to be amended but noted as there is no issue as to service this permission may not be required, nonetheless he sought permission to amend:-

1. the Claim Form (plans attached were not labelled); and
2. the Particulars of Claim (plans were attached to AW w/s but not POC despite being referred to)

Permission granted.

Witness Statements / Evidence

The Judge noted that para 7 of AW w/s #2 related to protests at Gatwick (no injunction in place) on 24 June 2024.

The Judge noted the arrests that had been made and referred to in AW w/s, but was critical that there was no copy of Mr McBride's witness statement, obtaining it online was not practicable. The Judge noted that it was hearsay evidence.

TWKC provided AW w/s #4 to the Judge (updated Plan 3A).

Issues

Judge's primary concerns:-

1- Why have the defendants not been named or notice provided to the individuals, they being the ones alleged in the evidence as the guiding light / drum beaters. If they are known to be part of the persuaders then why aren't they defendants?;

2- General queries concerning clarity of the areas covered by the injunction, highways and third party land etc.; and

3- *Definition of Persons Unknown ("PU") - currently the definition of PU would cover protesting about delayed luggage (for example) – the Judge considered that would be too wide and needs to be more focused.*

Titles

TMKC explained Plan 1 and Plan 1B.

To clarify the Judge's query on C's rights to claim an injunction over a national highway (included within the red line on Plan 1), TMKC explained it would be to restrain nuisance affecting the customers and operations of the airport; the byelaws themselves cover disruptive nuisance over the highway.

TMKC clarified Cs are not asking the court to grant an injunction in aid of the byelaws, and provided examples of terminal cases with injunctions granted over highways.

The Judge considered an example of individuals sitting in the tunnel and stated that it's got nothing to do with trespass. It is a nuisance to interfere with anyone's right with the use of the highway. The nuisance would be that it obstructs the passageway of staff and licences. It could also be framed within the economic torts.

TMKC discussed the runway lights; these are affected by complex tapestry of titles, however, the structures of the lights are owned by the Cs. The Judge considered that the ownership of the land did not matter because Cs owned the lights and there could be a danger if the lights were covered and the planes could not land because they could not see.

TMKC explained Plans 1A – 3A and 1B – 3B; the third party areas should not be carved out and to recognise that anyone protesting in these areas is doing so in the airport and it is not appropriate to try to draw that distinction. There is also potential for protestors to be misled / create confusion.

Airports' Distinctiveness

TMKC explained that airports are not like normal places. Even peaceful protests are problematic and could be used as a mask for more serious things. There is potential for a peaceful protest to become not peaceful and/or to be misinterpreted by security staff. Airports are key national infrastructure. Security is the single most important item on the agenda.

TMKC drew the Judge's attention to VJH w/s on responsibilities of operators (on safety); safety is an issue of huge importance and there is sufficient chain of evidence for the court to accept the submission.

TMKC discussed that the central element of this equitable jurisdiction is that anyone can come and say "no this is too wide" and at that point, there can be arguments about it. At this stage, it is appropriate to proceed on a precautionary basis which is intrinsic to this jurisdiction, at least when there is evidence that it goes beyond mere assertion.

TMKC explains that third party occupiers have been notified and no objections received to the claim.

Plans

<u>Leeds Bradford Airport</u>

TMKC explained Plan 1A and why internal layout plans of the green buildings have not been provided (complexity).

London Luton Airport

TMKC explained Plan 2B, Plan 2A (including the highways) and Plans 2C – 2I.

TMKC explained the railway which is within C2's titles / ownership.

Newcastle

TMKC explained Plan 3, Plan 3B, Plan 3A (as substituted by AW w/s #4) and Plans 3C-3D.

TMKC there has been no uniform practice developed in these cases about whether notice should be given to third parties (e.g. the difference in approach in claims by the MAG group airports with Heathrow).

Threat and the compelling need

TMKC provided summary of incidents AW w/s #1 - the environmental campaign in recent years and also referred to para 52 of AW w/2 #1 (HB/264) - Tweet by Just Stop Oil ("JSO").

Helps to explain why these injunctions are effective. They recognise that injunctions are special, still that much respect for the law.

The Judge queried whether arrested JSO members should be a named individual; TMKC explained that they are no longer considered to be a threat given that they had received sanctions.

TMKC explained that apart from the obligation to identify the name, notification should also be as effective as possible.

Judge was uncertain as to why individuals were not named as defendants where they could be as "troop leaders"; those that can be named, should be named but they should be notified at least, whether they are named is a matter for Cs.

TMKC refers to AW w/s #3 and the JSO letter to the prime minister and the explicitness of their recent statement on *taking action at airports* (HB/591).

Specific to the Airports (LBA/LTN/NCL)

Generic features which make airports vulnerable to peaceful protest which the attempted protest at Gatwick airport with the bandages evidences. The cascade effect of from one cancellation / delay also makes them particularly vulnerable and that they are dangerous places.

At these airports, the lack of airbridges create a special acute level of risk of protestors breaking away because passengers have to cross the apron to get to aircraft and runways are closer to terminals - when the passengers are out in the open, there are additional security risks.

Cs have tried to accommodate protest, there were cornered off protest areas for safe and peaceful protest; Judge proposed a recital in the Order for a contact for peaceful protests.

All the airports are also protected by byelaws which prohibit disruptive protest.

Draft Order

The Judge considered the definition of PU to be too wide "persons unknown whose purpose is or includes protest". The POC centre on protests that focus on fossil fuels. Appropriate wording is required that focuses on the actual substance of the complaint.

Cs have a continuing duty of full and frank disclosure (therefore it would provide to the Court all relevant information if it had to enforce the relief).

Cuadrilla – paras 60, 65 and 69 (AB/376) - no objection to framing an order which involves a subjective element. If there is a problem, C would have a duty to satisfy the evidential burden.

TMKC addressed other questions by the Judge:

1- Why have we not named individual – covered

The Judge granted permission to amend stating it will be "as you see fit".

2- Areas covered which were highway and third party land

TMKC submits that in relation to all third party areas it is necessary to make the injunction effective, the supporting reason that protest activity on third party land and/or highways would be a nuisance, a direct tort. There is the issue of silent protest on third party land which would not be a nuisance, but that is caught by the first, we can't have situations where security need to monitor peaceful protest, not in an airport – elsewhere maybe.

3. definition of PU being too wide

TMKC did not develop further on this.

The Judge suggested adding a note to the order.

TMKC stated that the balancing exercise remains and sought that the Judge evaluates the submissions in light of the skeleton argument.

Judgement

This is an *ex parte* application issued on 16.07.2024 for injunctions against PU to exclude them from 3 airports and for alternative service provisions, extempore judgement fit within that period.

This Judgment is focused on LBA but will apply to LTN and NCL.

The POC identified third party areas over which Cs lacked possession (Plans 1A, 2A and 3A).

Cs set out that:-

- the public had implied consent to enter the airports;
- without any right to protest or such activities as had ben threatened by JSO;
- any person entering or staying on for protests would be a trespasser.

Third party areas were identified to which Cs are not entitled to possession but it was pleaded that Cs are entitled to protect their interest.

Protests on third party areas / highways would constitute a breach of the airports byelaws and in submission of this, suggested it would constitute a nuisance.

The Judge identified the various threats of protests as noted in the witness evidence (including at LTN); where the byelaws and breach thereof had no or little off putting effect.

Judge summarised the evidence in AW, VJH, AM and NJ w/ss.

The claimants sought injunctions to be reviewed every 12 months,

The cause of action: trespass, public/private nuisance. There is no claim for an economic tort or conspiracy. It is based on *quia timet* as there is no threat of direct action, but there is imminent threat.

Secondly, having looked at the disclosure that was provided in the professional bundle provided by Eversheds I consider that full and frank disclosure has been provided

Sufficient evidence: the evidence of ownership is sufficient and that the historic evidence is sufficient for proof of a risk of trespass and of public/private nuisance at the airport or the roads.

A realistic defence: That is on the basis of if it is a defence to protesters entering these airports with the intention to disrupt or breach the byelaws, the range of protests that has been used by environmental groups in the past has been very wide, including locking on, damaging structures, spraying paint, sit-ins/glue-ins, and many others. For such activities I do not foresee any realistic defence. I take into account of course that any injunction will be against unlawful activities or in breach of the byelaws.

Balance of convenience / compelling justification: is there a compelling reason to grant the injunction - the most relevant event is the threat made to the new Prime Minister of the UK which is comparable to previous threats made, these threats have a history of not being made lightly and such threats being seen through, including trespass, public and private nuisance. The other public and direct activity which has created torts and perhaps crimes, was Stansted and Farnborough, the threat to other airports may have been undermined by substantial arrests including the one relating to the Gatwick bandages arrest.

Airports are part of the national infrastructure which are actually sensitive to threat, they are frighteningly complicated organisations involving the movement of thousands of members of the public near the movement of huge and highly combustible equipment. They are particularly sensitive to direct action/unlawful protest.

Fear of CEOs is that terrorism is facilitated by chaos. Human rights of passengers who businesses or holidays may be catastrophically interrupted or cancelled. Although not pleaded, it is worth taking on the knock on effect on employment, however, I don't have those in the front of my mind because there is no pleading in for economic torts.

JSO and XR have made good on their threats in the past in a way that has caused enormous tax payer and private financial expense and disruptions at oil terminals, roads, sporting events and as threatened, potentially at airports. I also take into account that the evidence before me shows that previous High Court decisions have been effective in preventing unlawful activity. Also take into account the protesters lawful right to express their views, lawful protesting set out in Mr Hodder's statement is the right of every English person and is not to be restricted.

There is compelling justification to prevent fossil fuel protesters from entering or staying at these three airports and from protesting there and from any direction which could cause chaos / danger or constitute the torts set out in the particulars of claim.

Would damages be an adequate remedy: Obviously not: (1) PU by definition are unknown; and (2) I do not know of any case in which a PU has stumped up for any chaos they have caused.

I do not think they would go anywhere near to compensate the chaos that could be caused at an airport, for instance, on the tarmac. Therefore, damages are not an adequate remedy. It is better to prevent the chaos than compensate / fail to compensate.

Identifying PUs: Needs to include "fossil fuels". It is a duty of this court, to make absolutely clear the boundaries of the definition of PUs and I consider there is a potential

lack of clarity in defining them as protestors. There may be lawful protests that would otherwise be caught by the current too wide definition.

Scope of the injunction: I do not consider that there is a compelling justification for the injunction to cover flights going in and out of the airport.

Injunction: I consider that this is sufficient but I would add "for the purpose of fossil fuel", and consent of Cs.

The geographic boundaries: In relation to areas within the possession of the claimant and private jet areas, in view of what happened on Stansted, it is necessary that the injunction covers those private operations which are at least within the freehold ownership.

Finally, landing lights – I consider that the injunction should cover the landing lights as they are equipment owned by the Cs and if Ds disrupt it would be extremely chaotic and dangerous.

Temporal limits: review annual is sufficient, safe and fair way to protect rights of PU.

Service: methods of alternative service, agreed as per draft Order and provided to Reuters.

Right to vary or set aside: right should also be granted specifically to Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow, those 3 persons should be served directly by alternative service (website/email address).

Tidy up matters: whilst Public Order Act 2023 and Byelaws have changed the landscape somewhat in this application, they do not undermine the need for a proactive approach toward what would be catastrophic tortious damage.

Permission to amend CF and POC.

Case No: KB-2024-002317
Neutral Citation Number: [2024] EWHC 2274 (KB)

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

MR JUSTICE RICHIE

BETWEEN:

LEEDS BRADFORD AIRPORT LTD & ORS

Claimant

- and -

PERSONS UKNOWN

Defendants

MR T MORSHEAD KC appeared on behalf of the Claimant
NO REPRESENTATION on behalf of the Defendants

JUDGMENT

TRANSCRIPT APPROVED

1. This is an ex parte application issued on 16 July 2024, for injunctions against Persons Unknown, to exclude them from three airports and for alternative service provisions. It was listed for two and a half hours and so I am giving an ex tempore judgment to fit within that period.

2. The action was commenced by a claim form issued on 16 July 2022, for an injunction against trespass, private and/or public nuisance by persons unknown. The particulars of claim served with the claim form defined persons unknown in two categories: the first category is in three parts. There must be (1) a purpose to protest; (2) on the land of the Claimants who run the airports or on their clients land; (3) the unknown person must enter either the land or a flight on the land, and by "flight", I mean aircraft. The second category covers a protest which actually takes place on the premises. Most of the examples I will give in this judgment are going to relate to Leeds Bradford Airport but they apply equally to the other two airports the subject of this claim, which are Luton London and Newcastle International. The particulars of claim went on to set out the areas over which the injunctions are claimed shown specifically on the three numbered plans.

3. The Claimants set out that the public have implied consent to enter the airports for travel, drop off, meeting and other lawful business, but that no one has the right to enter for protests or such activities as have been threatened by “Just Stop Oil” (JSO) recently. It was pleaded that any person entering or staying on the airport land for the purpose of protest would be a trespasser. Third party areas were identified, in which the Claimants are not entitled to possession, but it was pleaded that the Claimants are entitled to protect their rights by extending the injunction over the third party land if such protection by injunction is necessary and proportionate to give effect to the injunction over their own land. Highways constituted some of the third-party land and if protest occurred on the identified highways it was pleaded that would interfere with access to the Claimants’ airports, and would constitute a breach of the airport's bylaws. In submissions it was suggested it would constitute private and/or public nuisance.

4. The pleading set out various threats made by environmental organisations, including a threat on 13 September 2023, in relation to highways protests and on 9 March 2024 at a meeting in Birmingham, reported by the Daily Mail, allegedly of JSO, threatening direct

action at airports in the summer, including: cutting fences, cycling on runways, climbing onto planes and staging sit-ins. Website threats were also set out on the JSO website involving non-violent civil resistance at airports. JSO had threatened to put together teams of ten to fourteen people, collecting altogether around 200 people, to carry out this direct action. They also published a fund raising or crowdfunding page, on which it was said that this would be their most audacious action yet.

5. By an email dated 6 June 2024, sent out to JSO members, it was said that this summer action at airports was coordinated internationally across Europe, taking the fight to airports. Four days before, on 2 June 2024, environmental groups through Extinction Rebellion had carried out direct action at Farnborough, and 14 days later on 20 June 2024, direct action had taken place by JSO at Stansted, including spraying orange paint on a private jet.

6. It was pleaded that Extinction Rebellion had carried out repeated actions at Luton Airport between 2019 and 2022. It was pleaded there was a strong probability of direct action at airports this summer and that the Claimants sought injunctions to prevent apprehended trespass and nuisance. It was that pleaded direct action at airports was dangerous and was banned by the byelaws of the airports. It was pleaded that the byelaws and enforcement of breaches thereof only resulted in modest benefit and had no or little "off putting" effect. The *Public Order Acts 1994 and 2023* were pleaded, but it was pleaded that those would not protect the Claimants in advance. The Claimants sought injunctions to be reviewed every 12 months for Persons Unknown not to enter or occupy the airports and protest.

7. Evidence has been put before me from the following witnesses: Mr V Hodder, the Chief Executive Officer of Leeds Bradford Airport, in a witness statement dated 15 July 2024; Mr Alberto Martin, the Chief Executive Officer of Luton Airport, in a witness statement dated 15 July 2024: Mr Nick Jones, the CEO of Newcastle Airport, in a witness statement dated 16 July 2024; and Mr Alexander Wright, a lawyer at Eversheds, in four witness statements, the first dated the 16 July 2024, the second dated 17 July 2024, the third and fourth dated variously 17 and 18 July 2024.

8. Mr Hodder asserts in evidence that JSO threatens to disrupt Leeds Airport in the summer of 2024 and points to there having been some protests already and previous Extinction Rebellion protests. He gives evidence that there is a £100 million expansion going on at the airport which is jointly owned with Luton and Newcastle by an organisation. The Claimants are not trying to restrain peaceful, legitimate protests, however, the airport at Leeds carries four million passengers per annum and intends to expand to carry seven million passengers per annum. They would expect about 17,200 passengers per day, alongside 25 commercial deliveries per day. He set out that ten commercial airlines operate at the airport, alongside private aircraft.

9. He gave evidence that passengers have a license to enter the airport, but protesters do not. He set out the detailed statutory obligations on the airport owners in relation to safety and maintenance and clearly explained that the Claimants would have to shut down any areas of the airport which had become unsafe and would have to remove obstacles and debris from runway and other surfaces. He set out the byelaws of Leeds Airport which: required the public to leave if requested to for causing disturbances, prohibited demonstrations, prohibited obstructions or tampering with equipment, prohibited flags and banners, prohibited climbing walls and fences, and prohibited causing dangers.

10. He set out nine historic protests about the Leeds Airport between June 2019 and March 2022, by Extinction Rebellion, healthcare workers and Stay Grounded UK. All of those, except one, were lawful protests and, in my judgment, none of them justify the relevant requirements for granting **ex parte** injunctions against Persons Unknown. The one which was potentially not lawful, involved protesters chaining themselves to the Civic Hall railings, all the rest occurred in Leeds and were focussed either at the Magistrates Court or at the Civic Centre.

11. Mr Hodder also summarised activities at other airports, but I will come to those when dealing with the evidence of Mr Wright. Indeed, he relied on the evidence of Mr Wright to assert that there was a real and imminent risk that needed an injunction. He set out that Leeds Airport, on request, had previously granted specific areas for protestors to carry out peaceful protests, but that no requests had been made by Just Stop Oil or any environmental protest group for this summer. He set out the exquisite vulnerability of

airports due to their operational complexity and of these three airports due to the nearness of the terminals to the runways and the lack of airbridges taking passengers directly into aircraft. In these airports many passengers walk across the tarmac to get onto an aircraft.

12. He pointed out the vulnerability of Leeds due to the public highway crossing the middle of the airport, underneath the runway and warned of the huge financial costs of disruption. He asserted the Claimants had reasonable fears that Leeds would be the target of protestors in the summer, which would include accessing airside, damaging property and runways. He set out his evidence on the balance of convenience, including the risk of very serious disruption, the lack of advanced warning and that damages would not be an adequate remedy. The first Claimant only seeks to restrain unlawful activity. He asserted that the junction would be an effective deterrent because it had been in other fields of commercial enterprise. He accepted that the Claimant had never enforced its byelaws previously through criminal prosecution, but that he feared that any such prosecution would cause delay and might be taken over by the DPP, would be reactive and not proactive and would only result in a small penalty. He asserted, importantly, that he considered the threat to the airport was credible, due to the environmental organisations' historic direct actions and that the significant harm that would be caused if they did so again and asserted that this justified the injunction.

13. He set out recent injunctions obtained by London City; Manchester; Stanstead; East Midlands and Heathrow airports variously on 20 June, 5 July and 9 July 2024, and then he exhibited those injunctions to his witness statement. I have read them. He offered undertakings. In the exhibits it is clear that there were environmental attacks (reported in the press) at Farnborough and Stansted, which were unlawful and direct action was taken by the protesters. Chief Superintendent Howells set out that many people had been arrested who were JSO members planning to disrupt airports across the country. I am afraid I have not noted the dates of those arrests and it is not apparent from the exhibit. He also exhibited news reports of a direct action protest at Munich in February 2023, but I will come to that later.

14. Alberto Martin sets out matters in relation to Luton Airport. I have taken all of those into account, but it is not necessary for the purposes of this judgment to summarise that evidence, save to say that he listed the historic events at Luton which included four events

only one of which was Direct Action. In January 2020, Extinction Rebellion marched from the airport to the town; on 29 August 2020, Extinction Rebellion accessed the airport terminal and roundabout and entrance; on 2 December 2021, protesters attended the local authority meeting and on 30 May 2024, protesters protested at Luton Train Station. He set out his fears and apprehensions about protests within Luton Airport, and made the same or similar submissions about the balance of convenience, and he offered an undertaking.

15. Nick Jones, the CEO of Newcastle Airport gave evidence in his witness statement. Again, I will not summarise it here, because it follows the same course as the previous two Chief Executive Officers.

16. Evidence was provided by Alexander Wright, a solicitor from Eversheds. It is important when providing such evidence that the statements at the start are set out: (1) that the evidence provided is from within the witness' own knowledge and (2) where it is not within the witness' knowledge and is hearsay, that the sources should be stated. That promise regretfully was not always fulfilled throughout the witness statement. I make no criticism of Mr Wright for that, because he was clearly doing his best, but it is very important on ex-parte applications for the evidential rules to be followed. He set out that Roger Hallam was the founder of JSO in February 2022, and the had previously founded Extinction Rebellion. This was apparently obtained from the JSO website. He asserted, through hearsay obtained from an unknown source, because it is not stated in the witness statement, that in September 2019, Roger Hallam flew drones at Heathrow and was convicted of a conspiracy to cause a public nuisance and given a two-year prison sentence which was suspended. He asserted from Roger Hallam's own website that he had been imprisoned three times.

17. In relation to previous JSO actions, Mr Wright set out twenty-nine direct actions or potentially such, which were probably unlawful and which included invading: the Bafta Ceremony, Everton Football Club, art galleries, Silverstone Grant Prix, the National Gallery, petrol filling stadiums, Central London roads, the Queen Elizabeth II bridge, Harrods, MI5, M25 junctions, the Snooker Championship, the Chelsea Flower Show, the Rugby Premiership final, the Ashes, the Lords cricket grounds, Wimbledon, The Proms, The Open Golf Championship, a performance of Les Miserable, Parliament Square, the

Royal Courts of Justice, the British Library, a wedding, Stonehenge and Stansted Airport. He recited that injunctions had been granted by the High Court against Just Stop Oil, Extinction Rebellion and Youth Climate Swarm for direct actions taken between March and April 2022, at various oil terminals, including Kingsbury in Staffordshire. One of those was obtained by Valero Energy.

18. He set out that Ben Smith, the Chief Constable at Warwickshire, in a witness statement dated 10 April 2022, had summarised that hundreds of arrests had taken place before those injunctions were issued and there were significant costs of policing the various protests around the country at oil terminals. These produced significant adverse effects on the community.

19. In relation to civil claims: there were eight Queens Bench Division actions set out in the witness statement. Mr Wright asserted, without giving the source of the evidence, that the injunctions stopped the direct protests and that there had been no applications to commit for contempt, certainly within the knowledge of Eversheds who were involved in some of those actions. The source of that information can be implied. He also set out that a variety of Local Councils and the National Highways organisation had obtained injunctions and he pointed to JSO posts which appeared to accept injunctions made protests impossible.

20. Turning then to the threats in relation to these injunctions. The key ones were obtained by an undercover journalist from the Daily Mail, at a meeting with JSO on 9 March 2024, in which a woman called Indigo Rumbelow stated the JSO planned to gather at the airports and use direct action by cutting fences, cycling on runways and climbing onto airplanes. Further investigative journalism was reported by the Evening Standard of another meeting chaired by Phoebe Plummer, which set out "radical", "unignorable" action in alliance with a European group called "A22". Mr Wright set out excerpts from the JSO website that they were planning to put together teams of ten to fourteen people who would risk arrest. The JSO boasted that their new actions were going to be big. On their fundraising page they boasted gathering £24,275 for this endeavour. I note that neither Mr Wright nor the Claimants made any effort to identify the names of the account holders or the account numbers by approaching Mr Hallam, or either of the two defendants, Indigo Rumbelow or Phoebe Plummer or applying for disclosure.

21. Mr Wright set out that the police had made various arrests for conspiracy to disrupt national infrastructure in June 2024, then he set out EU/USA wide airport protests in Munich, Farnborough, Stansted, Dusseldorf and Boston (I believe that is Boston USA) and Braunschweig, which I believe may be in Austria, but it is not stated. Those protests taking place between November 2022 and June 2024, the latest two being in England.

22. Mr Wright then set out that he did not know the names, and the Claimants did not know the names of the persons who would protest. This rather undermined his evidence about Mr Hallam, Ms Rumbelow and Ms Plummer and I shall come to that later. In relation to service, he explained that the Claimants had concerns that the PU's would deliberately target airports if served with a notice of application for the injunctions, and that direct action might be accelerated by service although no evidence was put before the Court in support of that assertion. He set out previous ex parte injunctions for airport owners granted by Julian Knowles J and her Honour Judge Coe KC, sitting as a Deputy High Court Judge.

23. In a second witness statement he set out a report of how protestors had been arrested on 25 June 2024 by the police, which suggested that they were carrying bandages, which they were intending to deploy at Gatwick Airport. The news report is short and does not provide much detail. In a third witness statement, a very worrying threat is laid out, sent by Just Stop Oil to the new Prime Minister, on 17 July 2024, threatening a campaign of non-cooperation at airports unless the government complied with various demands in relation to fossil fuel. In a fourth witness statement, Mr Wright provided some evidence about property rights.

24. That brings me then to the matters that need to be determined in considering whether to grant the injunction requested. I am grateful to counsel for his careful and full submissions. I am going to follow the checklist set out in the *Valero Energy Ltd & Ors v Persons Unknown* [2024] EWHC 134, bearing the time in mind. I take into account the guidance in *Canada Goose v Persons Unknown* [2020] 1 WLR 2802, and *Wolverhampton City Council v London Gypsies and Travellers* [2024] 2 WLR 45, and *Cuadrilla Bowland Ltd v Persons Unknown* [2024] WLR.

THE CAUSE OF ACTION

25. The cause of action pleaded by the Claimants involves trespass, private and public nuisance. There is no claim for an economic tort or conspiracy. It is based on quia timet, because as yet there has been no group action at any of these three airports. However, it is clear from the authorities that past direct action is not a prerequisite of granting a quia timet injunction. By quia timet I should say I mean "what we fear". Secondly, having looked at the disclosure provided in the professionally and fully provided bundles supplied by Eversheds and the Claimants, I consider that there has been full and frank disclosure by the Claimants seeking injunctions against the Persons Unknown. Thirdly, I have to consider whether the evidence is sufficient to prove the claim.

26. At this stage, I am content to find that the ownership evidence is sufficient and that the historic evidence is sufficient for proof of a risk of a trespass, of private nuisance or of public nuisance at the three airports or the approach roads included within the red circumference lines drawn on the three plans.

27. Next, I have to consider whether there is a realistic defence. Is there any defence to protestors entering, for instance Leeds Airport, intending to disrupt directly the activities at Leeds Airport by any physical method, or intending to protest in breach of the byelaws. The range of potential protests that has been used by environmental groups which involve themselves in unlawful direct action in the past, has been very wide. It has included trespass and then locking on, digging, climbing structures, damaging structures, spraying paint, blocking off structures, sit-ins and many others. For such activities, I do not foresee any realistic defence. I take into account, of course, that any injunction that will be granted, will be against unlawful activity, or activity in breach of the airport's byelaws, not against lawful activity.

28. I then come to the next part of this decision, which is the balance of convenience. That test is not the correct test on ex parte injunctions against persons unknown. The test is whether there is a "compelling justification" for granting the injunction. To assess that I need to look first at the key threats and historic events I have set out. The most relevant, it seems to me, is the threat made to the new Prime Minister of Great Britain, which is parallel with the threats made to a previous Prime Ministers in the last two years, relating to oil terminals. These threats have a history of not being lightly made and have a history

of being seen through by illegal, unlawful activity, including trespass, public and private nuisance.

29. The other direct activity which involved torts and crimes took place at Farnborough and Stansted. The threat in relation to other airports may well have been reduced or undermined by Police actions in carrying out substantial numbers of arrests around the country, including the one relation to the Gatwick bandages protesters. These are not fanciful concerns.

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 moment 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. I take into account the human rights of the passengers, adults and children, families and individuals, whose business trips and family holiday trips would be potentially catastrophically interrupted, delayed or cancelled by disruption at any of these airports in the summer season. Although not pleaded, it is not irrelevant to take into account the knock-on effect on employment, union members and the businesses which are run in the airport and which run the airport, financially. However, I do not have the financial aspects at the front of my mind because there is no pleaded economic torts claim.

32. I take into account that JSO and Extinction Rebellion have made good on their threats in the past, in a way which has caused enormous taxpayer and private financial expense and disruption, at oil terminals, on roads, at sporting events and has threatened airports. I also take into account that the evidence before me shows that previous High Court injunctions have been effective in preventing unlawful behaviour. I take into account the rights of the protestors, lawfully to express their views and how important it is that those rights are not fettered. Classic examples of those are the list of events set out in

the witness statement of Mr Hodder in and around Leeds, particularly at the City Council. Lawful protesting is the right of every English and Welsh person and is not to be restricted lightly.

33. I have come, at this stage, to the firm judgment that there is compelling justification for granting injunctions to prevent fossil fuel protestors from entering or staying at these three airports, and from protesting there and from any direct action which could cause chaos, danger and would constitute the torts set out in the particulars of claim.

34. Next, I have to consider whether damages would be an adequate remedy. In my judgment they would not be an adequate remedy for a number of reasons. Firstly, because the PU's are, by definition, unknown. Secondly, because there is no evidence before me and I know of no case in which a PU has stumped up damages for any of the protests carried out at oil terminals or motorways, at finals of sporting events for the chaos they have caused. Thirdly, because none of the Defendants in these cases have made any effort to disclose Just Stop Oil's bank accounts and whether they are in the names of Mr Hallam or Phoebe Plummer or Indigo Rumbelow or anybody else, nor to disclose how much money is within those accounts. Even if they did, I have no evidence that those sums would go anywhere near to compensating the aircraft carriers, the airport owners, the delayed or denied passengers, the shops or the emergency services for the chaos that would be caused by a direct action protest at an airport, for instance, on the tarmac. It seems to me that damages are plainly not going to be an adequate remedy, nor will there be adequate damages, to provide any remedy on the evidence before me. It is better to prevent the chaos than to fail to compensate for the chaos.

35. Coming then to partly substantive and partly procedural requirements, as to identifying PU's, I do not consider that the current definitions of PU's are satisfactory and I will require the definitions to qualify a protest by use of the words "About fossil fuels". I have listened carefully to the well-structured and persuasive submissions of Mr Morshead, but I am afraid I do not accept them. It is the duty of this Court, as required by the Appellate Courts, to make absolutely clear and in plain language, the definition of PU's. I consider that there is a potential lack of clarity in defining PU's just as "protestors". Many people protest to many aircraft carriers and airports about a huge range of things, including delayed luggage, dirty floors, poor announcements and other

matters. There may be protests, individually or by families or groups, that would otherwise be caught by the current, too broad, definition.

36. Having carefully listened to Mr Morshead's submissions about an injunction extending to the aircraft owned by other organisations who are not the Claimants, I am afraid I do not consider that there is a compelling justification for the injunction covering the flights going in and out of the airports. I consider that the injunctions should be restricted to the areas within the red boundary and that is sufficient to capture fossil fuel protestors who enter the boundary or go to the terminal. Any who get through security will most likely have their banners and/or their orange paint or lock-on devices, and they would have to go through the security gates, unless they cut their way in through the perimeter fencing. If they get out to walk across the tarmac, they will be caught by the injunction. If they wish only to protest by getting onto the flight, then I consider that whilst that protest is equally dangerous and would cause chaos, that it is insufficiently immediate for this to be covered by an injunction. It may be a different matter if one of the aircraft carriers wishes to join the proceedings and ask for the injunction to be extended to cover their aircraft, on the basis of actual perceived risks, but I would need to see the evidence of that.

37. In relation to the terms of the injunction as drafted, I consider that they are sufficient save, for instance in relation to Leeds, they say with immediate effect unless they are discharged or extended by a further order, the first defendant and each of them are forbidden from entering, occupying or remaining on any party of Leeds Bradford Airport without the consent of the first Claimant. I would add to that "for the purpose of protesting against fossil fuels" and I would add the word "prior" to “the consent of the first Claimant”. Subject to that, it seems to me that that matches the pleading for trespass and/or private or public nuisance. This of course would be a private nuisance if it was within the aircraft boundaries.

38. As for the geographic boundaries, I have looked very carefully at the helpfully coloured plans which show areas owned and possessed by the Claimants; areas which are owned but not possessed by the Claimants, for instance, those run by the private jet companies; and areas leased out to shops. Finally, the areas not owned by the Claimants on which they have equipment; I consider that for the areas within the Claimant's possession,

injunctions should be granted. I consider that, for the areas within the possession of the private jet operators, it is relevant for them to be asked whether they support the injunction. I have seen no email which says they directly do support it. I was given the submission by counsel that generally, they support it. It seems to me at this stage, in view of the fact of what happened at Stansted, which was direct action on private jets, that it is necessary for the good operation of these airports, that the injunction covers those private operations which are within at least the freehold ownership of the airports, even if they are let out to the private organisations.

39. Finally, in relation to the landing lights, I consider that the injunction should cover the them. They are equipment owned by the Claimant organisations and if protestors seek to disrupt night flights, they could disrupt the effective operation of those landing lights. That could be extremely chaotic and dangerous. The particular legal niceties of who owns the land, it seems to me, do not affect the necessity for those to be covered by the injunction. I rely in relation to that on paragraph 50 of the judgment of Leggatt LJ, in his judgment in *Cuadrilla*

40. In relation to the temporal limits, I consider that the request to review annually is an efficient, safe and fair way to protect the ECHR rights of Persons Unknown. In relation to service, I consider that the methods of alternative service, as set out in the draft order, namely a specific injunction page on the Claimants' website, sending emails to Just Stop Oil and Extinction Rebellion email addresses and affixing notices at and around the three airports, are sensible ways of bringing the injunctions to the attention of the Persons Unknown. What should be added to that is that the injunctions should be provided to the Judicial Press office and Reuters, so that they can be used by press organisations to publicise their existence. That should be added to the alternative service provisions.

41. The right to vary or set aside should of course be included in the order and that right, it seems to me, should also be granted specifically to Mr Hallam, Phoebe Plummer and Indigo Rumbelow. Those three persons should be served directly, either through any addresses given on Mr Hallam's website, or by alternative service on the Just Stop Oil and Extinction Rebellion's email addresses.

42. There are a couple of tidy up matters I should deal with in this judgment. The first is alternative remedies. I should make it plain that I have considered the enforcement of byelaws by criminal prosecution and the enforcement of the *Public Order Acts 1994 and 2023:* sections 1, 2 and 7. Whilst those have changed the landscape somewhat in this application for an injunction, I do not consider they undermine the need for a proactive approach in avoiding what could be catastrophic, tortious damage for the Claimants and to their customers. I should also say that I have granted permission to amend the claim to tidy up some defects in the plans and to consider economic torts, naming defendants and other matters. I do not restrict the amendment in any way, I have just given a general permission to amend the particulars of claim which have not yet been served.

43. To facilitate the freedom of speech of protestors I have invited the Claimants to put a recital in the quasi-final injunction, setting out the contact details for the staff members, who will offer to consider and, if appropriate, grant permission for controlled protest areas within the three airports. There was evidence before me that this has been done before, and it seems to me that it is appropriate for the contact details to be made available to those recitals.

END

(This judgment has been approved by the judge)

Claim no: KB-2024-002317

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) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMIED
(4) NIAL SERVICES LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

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 19 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025

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 Ritchie J Order

IT IS ORDERED that:

1. The Ritchie J Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 2 of the Ritchie J Order).

2. Paragraph 2 of the Ritchie J Order is amended so as to read:

"This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

KB-2024-001765 / KB-2024-002132 / KB-2024-002317 / KB-2024-002473

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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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 Dienne 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

N244

Application notice

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Name of court **The High Court of Justice** **King's Bench Division**	**Claim no.** KB-2024-002317
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
	H W F - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Leeds Bradford Airport Limited and others	
Defendant's name (including ref.) Persons unknown (as more particularly described in the Claim Form)	
Date	2 June 2026 02 Jun 2026

HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION

KB-2024-002317
Sub Event ID: 32

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

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 Ritchie J dated 18 July 2024 ("**the Ritchie 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.

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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 Ritchie J Orders are attached, together with the Bourne J Orders.

2. The Bourne J Orders and the Ritchie J Orders together provide that:

   a) the injunctions granted pursuant to the Ritchie 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 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

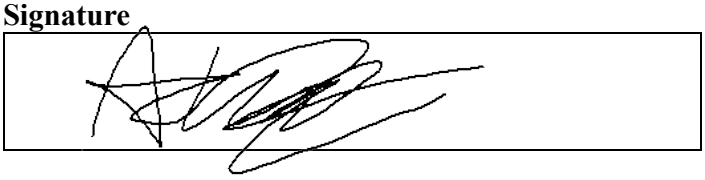
Statement of Truth

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	Month	Year
2	June	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

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BEFORE: MRS JUSTICE STACEY DBE

DATED: 16 JUNE 2026

BETWEEN:-

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants



- v -

PERSONS UNKNOWN AS DESCRIBED IN THE CLAIM FORM

Defendants

ORDER

UPON the Claimants' claim by the Claim Form dated 16 July 2024

AND UPON the Claimants' application for an injunction dated 16 July 2024

AND UPON the making of an injunction by order dated 18 July 2024 by Mr Justice Ritchie (as amended) ("**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 on 24 June 2026 or a date thereafter as soon as is convenient for the Court, together with the review hearing in claims KB-2024-002132 and KB-2024-002473, 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 9 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.

Wright, Alexander

From: KB Judges Listing Office <KBJudgesListingOffice@Justice.gov.uk>
Sent: 19 June 2026 15:43
To: Wright, Alexander; Owen, Elin; EvershedsCourtClerk; Stuart Wortley - New Mailbox (2026); 'NawaazAllybokus@eversheds-sutherland.com'; a@eversheds.com
Subject: KB-2024-002317 Leeds Bradford Airport Limited and others -v- Unknown and others

Dear all,

In accordance with the Order of Mrs Justice Stracey dated 16th 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

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Kind regards

Subash Vasudevan
Judges Listing Office Team Leader
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Party: Claimants
Name: A Wright
Number: Fifth
Date: 11.06.26
Exhibits: "AJW1 – AJW30"

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES 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 – AJW30**".

1.4 On 18 July 2024 (amended by the slip rule on 19 July 2024), Mr Justice Ritchie granted injunctions to restrain the Defendants from entering, occupying or remaining on Leeds Bradford Airport, London Luton Airport and Newcastle International Airport until varied, discharged or extended by further order ("**the 2024 Orders**") – copies of which are exhibited at **Exhibit AJW1**.

1.5 Paragraph 2 of the 2024 Orders provided for each of those injunctions 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 injunctions granted pursuant to the 2024 Orders were 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 Vincent John Hodder dated 15 July 2024 made on behalf of the First Claimant ("**the VJ Hodder Statement**");

1.8.2 the witness statement of Alberto Martin dated 15 July 2024 made on behalf of the Second Claimant ("**the A Martin Statement**");

1.8.3 the witness statement of Nicholas Jones dated 16 July 2024 made on behalf of the Third and Fourth Claimant ("**the N Jones Statement**");

1.8.4 my previous witness statements in these proceedings dated 16 July 2024, 17 July 2024, 17 July 2024 and 18 July 2024; and

1.8.5 the witness statements of Stuart Wortley dated 6 June 2025 ("**the First S Wortley Statement**") and 16 June 2025 ("**the Second S Wortley Statement**") which were both made on behalf of the Claimants for the purposes of the First Review Hearing (together "**the S Wortley Statements**").

2. BACKGROUND

2.1 The background to these proceedings is more particularly set out in the VJ Hodder Statement, the A Martin Statement, the N Jones Statement and the S Wortley Statements.

2.2 For present purposes it is sufficient to note that the injunctions were sought and obtained:

2.2.1 to protect Leeds Bradford Airport, London Luton Airport and Newcastle International 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 Orders in respect of Leeds Bradford Airport, London Luton Airport and Newcastle International 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 ORDERS AND THE 2025 ORDERS

3.1 The 2025 Orders are substantively on the same terms and provide:

3.1.1 at paragraph 1, that the 2024 Orders "*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 2 of the Ritchie J Order)*"; and

3.1.2 at paragraph 2 for a variation to paragraph 2 of the 2024 Orders.

3.2 The 2024 Orders, as varied by the 2025 Orders, are substantively on the same terms and provide:

3.2.1 for the injunction to take "*immediate effect*" and until "*unless varied, discharged or extended by further order…*"; and

3.2.2 at paragraph 4:

"*This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day*".

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 Orders and the 2024 Orders (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 Orders, in so far as they relate to Leeds Bradford Airport, London Luton Airport and Newcastle International Airport, were served in accordance with paragraph 9 of the 2024 Orders by:

4.1.1 a copy of the 2025 Order being uploaded to each of the individual airports' injunction websites. I have been informed by:

4.1.1.1 Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport, that a copy of the relevant 2025 Order was uploaded by a relevant member of staff to the Leeds Bradford Airport injunction website on 30 June 2025;

4.1.1.2 David Norris, Head of Legal for London Luton Airport, that a copy of the relevant 2025 Order was uploaded by a relevant member of staff to the London Luton Airport injunction website on 3 July 2025; and

4.1.1.3 Mark Hunt, Chief Financial Officer for Newcastle International Airport, that a copy of the relevant 2025 Order was uploaded by a relevant member of staff to the Newcastle International Airport injunction website on 30 June 2025.

Printouts from each of the individual airports' injunction websites are exhibited at **Exhibit AJW4**, confirming that a copy of the relevant 2025 Order was uploaded and continues to be available on those websites;

4.1.2 the continuing presence of warning notices at the locations marked with an "X" on the plans to the 2024 Orders (being the plans 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 Orders, a copy of the 2025 Orders was affixed at the locations marked with an "X" on the plans to the 2024 Order (being the plans at **Exhibit AJW5**) at London Luton Airport. I have been informed by:

4.1.3.1 David Norris, Head of Legal for London Luton Airport, that a copy of the 2025 Order was so affixed at the relevant locations at London Luton Airport on 1 July 2025; and

4.1.3.2 Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport and Mark Hunt, Chief Financial Officer for Newcastle International Airport, that a copy of the 2025 Order was not so affixed at Leeds Bradford Airport and Newcastle International Airport respectively.

4.2 In addition to the above steps, paragraph 9 of the 2024 Orders required a copy of the 2025 Orders to be served by an email sent to each of the email addresses listed in Schedule 3 to the 2024 Orders. 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 Orders by email on 9 June 2026, a copy of which is exhibited at **Exhibit AJW6**.

4.4 I am told by Mark Hunt, Chief Financial Officer for Newcastle International Airport that a regime is in place at Newcastle International 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 Orders.

4.5 I am told by Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport and David Norris, Head of Legal for London Luton Airport, that the original warning notices from 2024 were made of metal, so as to ensure their durability and that whilst such a regime as that adopted at Newcastle International Airport is not currently in place at their respective airports:

4.5.1 steps are being taken to confirm the continuing presence of the warning notices at the required locations ahead of the second review hearing; and

4.5.2 such a regime, as that adopted at Newcastle International Airport, will be put in place at their respective airports moving forward if the injunction is continued for a further twelve months at the second annual review hearing.

5. THE AIRPORT BYELAWS AND PLANS

5.1 The injunctions granted in this action and in actions 2 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) would not be entitled to legal possession – including for example highways land and areas which are demised to third parties).

5.2 The injunctions in this case currently extend to the land edged red on Plan 1 (Leeds Bradford Airport), Plan 2 (London Luton Airport) and Plan 3 (Newcastle International Airport) to the 2024 Orders – a copy of the relevant plans are exhibited at **Exhibit AJW7**.

5.3 I am informed by Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport and other members of her in-house legal team that:

5.3.1 there have been no changes to the Leeds Bradford Airport Byelaws 2022 and that the Plan attached to the Leeds Bradford Airport Order dated 18 July 2024 (as amended on 19 and 22 July 2024) remains accurate;

5.3.2 third party occupiers within the 'red line' of the injunction order boundary were informed on 9 June 2026 by Kunaal Wharfe, General Counsel for Leeds Bradford Airport that an application has been made to continue the injunction in respect of Leeds Bradford Airport for a further 12 months and that Mr Wharfe has received acknowledgments following that notification from Swissport and Border Force;

5.3.3 as part of the airport's LBA:REGEN project (a £100 million investment to expand the terminal and improve the customer experience through the airport), the First Claimant has granted its contractor a right to use and carry out works over an additional area in the vicinity of the terminal building (in addition to the area referred to in my first witness statement dated 16 July 2024), doing so as the First Claimant's agents pursuant to the Construction (Design and Management) Regulations 2015 and the First Claimant retains exclusive possession and control of this area of land.

5.3.4 it is now the case that:

5.3.4.1 17,000 travelling passengers each day are expected to pass through Leeds Bradford Airport during June, July and August 2026 (previously c.17,200 per day);

5.3.4.2 591 members of staff are now employed directly by the First Claimant (up from 515); and

5.3.4.3 8 airlines serve the leisure and business market from Leeds Bradford Airport rather than 10.

5.4 I am informed by Mark Hunt, Chief Financial Officer for Newcastle International Airport that:

5.4.1 there have been no changes to the Newcastle International Airport Byelaws 2021 and that the Plan attached to the Newcastle International Airport Order dated 18 July 2024 remains accurate; and

5.4.2 third party occupiers within the 'red line' of the injunction order boundary were informed by him on 1 June 2026 that an application has been made to continue the injunction in respect of Newcastle International Airport for a further 12 months - Mr Hunt has informed me that no responses have been received following that notification;

5.4.3 it is now the case that:

5.4.3.1 between 18,000 and 24,000 travelling passengers per day are anticipated to pass through Newcastle International Airport during June, July and August 2026 (up from c.15,000 – c.21,000);

5.4.3.2 c.650 members of staff are now employed directly by the Third Claimant (up from c.500); and

5.4.3.3 15 commercial airlines operate from Newcastle International Airport rather than 16.

5.5 I am informed by David Norris, Head of Legal at London Luton Airport and other members of his in-house legal team that:

5.5.1 the London Luton Airport Byelaws 2005 have been replaced with the London Luton Airport Byelaws 2025 – a copy of which is exhibited at **Exhibit AJW8** and that the extent of the land over which the London Luton Airport Byelaws 2025 apply differs from that over which the London Luton Airport Byelaws 2005 apply. I address the London Luton Airport Byelaws 2025 more fully in the next section immediately below.

5.5.2 key third party occupiers within the 'red line' of the injunction order boundary were informed on 9 June 2026 by email that an application has been made to continue the injunction in respect of London Luton Airport for a further 12 months and that steps are being taken to notify the remaining occupiers ahead of the second annual review hearing - Mr Norris has informed me that no responses have been received following that notification.

5.5.3 it is now the case that:

5.5.3.1 over 17 million passengers travelled through London Luton Airport in 2025 and over 18 million are expected to travel through it in 2026 (up from 16 million);

5.5.3.2 passenger numbers average c.47,000 per day, with highs now in excess of c.60,000 (up from c.45,000 and highs of up to c.60,000);

5.5.3.3 c.1,090 members of staff are now employed directly by the Second Claimant (up from c.950);

5.5.3.4 10 airlines now operate from London Luton Airport (up from 8);

5.5.3.5 daily revenue ranges from c.£670,000 to c.£1,146,000 (up from c.£450,000 to c.£850,000);

5.5.3.6 the Second Claimant's acquisition of the leasehold interest, by way of a transfer dated 29 February 2024, referred to in my first witness statement dated 16 July 2024 (at paragraph 10), has been registered at HM Land Registry under title number BD230068. A copy of the relevant registered title is exhibited at **Exhibit AJW9**; and

5.5.3.7 London Luton Airport is now the subject of a Development Consent Order ("**the DCO**"), to expand the airport to 32 million passengers per annum – the A Martin Statement referred to the application for the DCO.

6. THE LONDON LUTON AIRPORT BYELAWS 2025

6.1 A comparison of the London Luton Airport Byelaws 2005 and the London Luton Airport Byelaws 2025 has been undertaken and I attach as an Appendix to this witness statement a table detailing the relevant provision(s) in the London Luton Airport Byelaws 2025 as against the equivalent provision(s) from the London Luton Airport Byelaws 2005 as referred to in the A Martin Statement.

6.2 In addition to the above provisions, the following provisions of the London Luton Airport Byelaws 2025 are considered relevant and applicable and I therefore draw attention to them:

	London Luton Airport Byelaws 2025
4.1	*No person, without Permission, shall enter, or attempt to enter, an Airside location other than through an Airside Entrance Point (except if such entry occurs whilst being carried on board an Aircraft landing at the Airport*
4.2	*No person, without Permission, shall exit, or attempt to exit, an Airside location other than through an Airside Exit Point (except if such exit occurs whilst being carried on board an Aircraft taking off from the Airport).*
4.4	*No person, without Permission, shall enter or remain in an Airside location other than for a reasonable and proper purpose.*
5.2	*No person (other than an Exempt Person) shall enter, remain or work in any Airside location, unless:* *5.2.1 that person holds an Identity Pass which permits that person access to the relevant Airside location, or* *5.2.2 that person is escorted at all times by another person with an Identity Pass that permits that other person access to the relevant Airside location.*
7.1	*No person, without Permission, shall deface (whether by graffiti or otherwise) or damage any Airport Infrastructure, Airport Equipment, item, or any other property (including buildings, structures, fixtures, fittings, services, cables, pipes, drains and other conduits), equipment, machinery, tools or Vehicles which are owned by another person (other than with the consent of that owner).*
8.4	*No person, without Permission, shall behave in such a way so as to endanger themselves or any other person.*
8.5	*No person, without Permission, shall walk on any part of the Airport which is not designated by LLA for pedestrian use (including any road other than in the proper course of using a pedestrian crossing point marked for that purpose).*
8.8	*No person, without Permission, shall organise or take part in any public assembly, protest, demonstration or procession.*

6.3 The extent of the land over which the London Luton Airport Byelaws 2025 apply differs from that over which the London Luton Airport Byelaws 2005 apply. My colleague, Elin Owen, has overlaid the two plans and prepared the plan exhibited at **Exhibit AJW10** using the Orbital Witness platform to show the extent of the differences between them, which shows that:

6.3.1 three discrete areas are covered by the London Luton Airport Byelaws 2025 but not the London Luton Airport Byelaws 2005 ("**the LTN 2025 Areas**") shown on the plan at **Exhibit AJW10** shaded in purple; and

6.3.2 one discrete area is covered by the London Luton Airport Byelaws 2005 but not the London Luton Airport Byelaws 2025 ("**the LTN 2005 Area**") shown on the plan at **Exhibit AJW10** shaded in red.

6.4 In respect of the LTN 2025 Areas, I can confirm that:

6.4.1 the land making up the area shaded purple and marked 'Area 1' on the plan at **Exhibit AJW10** is:

6.4.1.1 let by the Second Claimant for a term of 21 years beginning on and including 7 February 2014 and ending on and including 6 February 2035. This lease is registered at HM Land Registry under title

number HD544934 and a copy of the applicable registered title and title plan is exhibited at **Exhibit AJW11**;

6.4.1.2 land on which the majority of London Luton Airport's landing lights, but not all, are located and which is not fenced off (i.e. this location is an open field), presenting practical difficulties for demarcation of the applicable boundary 'on the ground';

6.4.1.3 not land in respect of which the Second Claimant proposes to seek an amendment to the current London Luton Airport injunction plan – on the basis that (a) the physical footings of all airport landing lights are currently protected by and within the scope of the London Luton injunction; and (b) such protection is considered appropriate and sufficient.

6.4.2 I have been advised by David Norris, Head of Legal at London Luton Airport, that the land making up the area shaded purple and marked 'Area 2' on the plan at **Exhibit AJW10** is erroneously included within the scope of the London Luton Airport Byelaws 2025 and that steps are being taken to revise the plan appended to them to correct this. The Second Claimant therefore does not propose to seek an amendment to the current London Luton Airport injunction plan in respect of this area of land.

6.4.3 the land making up the area shaded purple and marked 'Area 3' on the plan at **Exhibit AJW10** is owned by the Second Claimant. The Second Claimant owns the freehold interest in this area of land, which is registered at HM Land Registry under title number BD146644 and a copy of the applicable registered title and title plan is exhibited at **Exhibit AJW12**. This area of land is used by the airport's car park operator (APCOA) to store cars using the airport's priority meet and greet service. I have been advised by David Norris, Head of Legal at London Luton Airport, that this area of land can only be accessed by passing through the wider airport estate. So as to ensure comprehensive protection for London Luton Airport and avoid an otherwise 'gap' within it which could potentially be exploited in the future, the Second Claimant proposes to seek an amendment to the current London Luton Airport injunction plan to include this area of land.

6.5 Noting the above, the Claimants will seek to re-amend the Claim Form by replacing plans 2, 2A and 2B with new plans, which at the date of this statement are anticipated to be in the form of those exhibited at **Exhibit AJW13**. The form of order the Claimants will seek will therefore include an amendment to the 2024 Orders.

6.6 The Claimants will also seek to re-amend paragraph 14 of the amended Particulars of Claim so as to refer to the provision in paragraph 8.8 of the London Luton Airport Byelaws 2025 and to otherwise update the amended Particulars of Claim so as reflect the terms of the London Luton Airport Byelaws 2025 more generally.

6.7 A formal application to make such re-amendment(s) will be made by the Claimants alongside or shortly following the filing/service of this witness statement.

7. HEALTH AND SAFETY RISK / RISK OF HARM

7.1 The health and safety risks and risks of harm presented by direct/unlawful protest activity at the airports in question are detailed in the VJ Hodder Statement, the A Martin Statement and the N Jones Statement. By way of summary, however, these include but are not limited to:

7.1.1 the Claimants' ability, at their respective airports, to ensure:

7.1.1.1 the safe operation of aircraft;

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

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

7.1.2 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;

7.1.3 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

7.1.4 impacting counter-terrorism and police operations at the respective airports.

7.2 I understand from Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport, David Norris, Head of Legal for London Luton Airport and Mark Hunt, Chief Financial Officer for Newcastle International Airport that the potential implications for counter-terrorism operations at their respective airports 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 AJW14**.

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

7.3.1 the previous evidence of Vincent John Hodder, Chief Executive Officer of Leeds Bradford Airport, in these proceedings as set out at paragraph 58 in the VJ Hodder Statement:

"*58. All airports are a potential target for terrorist activity (which explains why the airport is routinely patrolled by police carrying firearms) meaning:-*

58.1 there is heightened security and any activity which is out of the normal is particularly dangerous. Any protest activity could be interpreted (whether correctly or not) by the security services at airports as a potential threat, meaning that the police or security services may intervene with significant knock-on effects. If the protestors pose no security or counter-terrorism threat, that would be a distraction for the police and our security team and a diversion of resources which are necessary for the counter-terrorism work they carry out to keep members of the public safe; and

58.2 there is also always the potential that the protests are, or turn, violent or are, in fact, used as cover for actual terrorist attacks".

7.3.2 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 these proceedings 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…"

7.3.3 the recent incident at Southend Airport, referred to further below at paragraph 14.2, 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.

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

8.1 I am informed by Claire Acklam (Senior Legal Counsel for Leeds Bradford Airport), David Norris (Head of Legal at London Luton Airport) and Mark Hunt (Chief Financial Officer for Newcastle International Airport) respectively that there have been no incidents of protests (lawful or otherwise) at Leeds Bradford Airport, London Luton Airport or Newcastle International Airport since the 2025 Review Hearing.

8.2 I exhibit at **Exhibit AJW15** 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.

8.3 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.

9. **ENVIRONMENTAL / CLIMATE CAMPAIGN GROUPS**

9.1 *Just Stop Oil (JSO)*

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

9.1.1.1 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

9.1.1.2 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.

9.1.2 I note that:

9.1.2.1 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 AJW16**;

(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 9.2), 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 AJW17**.

(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 AJW18**.

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

9.1.2.3 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 AJW19**.

9.1.3 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 AJW20**, 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*".

9.2 <u>*Take Back Power*</u>

9.2.1 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 AJW21**).

9.2.2 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 AJW22**).

9.2.3 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 AJW23**.

9.2.4 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: • 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 AJW24**.

9.2.5 A clear target of the Take Back Power group is the 'super-rich'. This gives rise to particular concern for the Claimants and the subject airports because:

9.2.5.1 there are private jet facilities at all of the subject airports and indeed at all of the airports which are the subject of the Claims;

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

9.2.5.3 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 8.2 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 AJW25**); and

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

9.2.6 I am instructed that the Claimants are accordingly very concerned that their airports will become the focus of direct action by members of Take Back Power, given the presence of private jet facilities at their respective airports, in the absence of the continuation of the protection afforded by the injunction.

9.3 *Extinction Rebellion*

9.3.1 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.

9.4 *Fossil Free London*

9.4.1 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 AJW26**.

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

9.5 *Youth Demand*

9.5.1 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 AJW27**.

9.6 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.

9.7 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.

10. **OTHER AIRPORT INJUNCTION PROCEEDINGS**

10.1 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

10.2 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.

11. **WIDER INJUNCTION PROCEEDINGS**

11.1 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.

12. **DETERRENT EFFECT OF THE INJUNCTIONS**

12.1 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 Orders. In asking the Court to continue the injunctions granted by the 2024 Orders, 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 the airports in question.

12.2 Noting the continued lack of direct/unlawful protest activity at the airports in question, 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 injunctions so that they are not at risk of proceedings for contempt of court. I would also draw attention to:

12.2.1 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*".

12.2.2 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 injuncted area, in order to avoid the risk of associated penalties for breaching of the injunction."*

12.3 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:

12.3.1 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

12.3.2 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;

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

12.3.4 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;

12.3.5 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

12.3.6 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 AJW28**.

13. RESPONSE TO THE CLAIMS

13.1 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.

13.2 I am informed by Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport, David Norris, Head of Legal for London Luton Airport and Mark Hunt, Chief Financial Officer for Newcastle International Airport that the Claimants are not aware of the identity of any individuals who threaten to engage in direct/unlawful protest activity at their respective airports.

13.3 In relation to Leeds Bradford Airport, I am advised by Claire Acklam, Senior Legal Counsel, that protests have taken place by The Group for Action on Leeds Bradford Airport (GALBA) in respect of the planning application submitted in relation to nighttime flying at the airport. I understand that such protests have not taken place at the airport itself but rather at Leeds City Centre locations – copies of news articles reporting on such protests are exhibited at **Exhibit AJW29**.

14. FULL AND FRANK DISCLOSURE

14.1 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.

14.2 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 AJW30**. 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".

14.3 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 7 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.

15. CONCLUSION

15.1 I am informed by Claire Acklam, Senior Legal Counsel (on behalf of the First Claimant), David Norris, Head of Legal (on behalf of the Second Claimant) and Mark Hunt, Chief Financial Officer (on behalf of the Third and Fourth Claimants) that the Claimants' directors have concluded that they should respectfully request the Court to order that the injunctions remain in full force and effect, subject to a review in 12 months' time as provided by the 2024 Orders and subject to an amendment to plan 2 to the London Luton order. I understand that they reached this decision 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 injunctions are continued in full force and effect, subject to a review in 12 months' time, the Claimants will reassess matters afresh next year.

15.2 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 the subject airports and/or causing a private or public nuisance on or around them if the injunctions were now to be lifted.

15.3 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.

15.4 The Claimants consider that the injunctions have 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 their respective airports. It is for this reason that they seek the injunctions remain in full force.

15.5 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.

16. **NOTICE OF THE REVIEW HEARING**

16.1 The Claimants intend to give notice of the review hearing in the manner provided for in paragraph 9 of the 2024 Orders – namely by:

16.1.1 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;

16.1.2 sending copies of the documents referred to in the previous paragraph to the email addresses referred to in Schedule 3 to the 2024 Orders plus the following additional email addresses:

16.1.2.1 info@takebackpower.net and press@takebackpower.net which are understood to be linked to Take Back Power;

16.1.2.2 shut the system info@proton.me, which is understood to be linked to Shut the System;

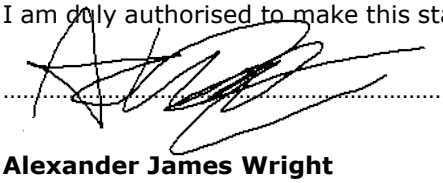
16.1.2.3 campaigner@fossilfreelondon.org and operations@fossilfreelondon.org which are understood to be linked to Fossil Free London; and

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

16.1.3 affixing a notice at each of the warning notice locations at each 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

Appendix 1

London Luton Airport Byelaws 2005		**London Luton Airport Byelaws 2025**	
2.24	*No person shall remain on the airport or any part thereof, after having been requested to leave by an airport official or by a constable, and no airport official or constable shall request a person to leave unless he has reasonable grounds to believe that that person has committed or is about to commit a breach of a byelaw or a criminal offence.*	19.1	*An Airport Official or Constable may make an oral or written request to a person, for that person to leave the Airport and not return for a period of 24 hours from the time of that request, if that Airport Official or Constable has reasonable grounds to believe that that person has committed or intends to commit a criminal offence (including a breach of these byelaws).*
		19.2	*No person, without Permission, shall fail to immediately leave the Airport, and not return for a period of at least 24 hours, if requested to do so by an Airport Official or Constable in accordance with byelaw 19.1.*
		19.4	*An Airport Manager or a Constable may issue an Exclusion Notice to a person by either handing that Exclusion Notice to that person or by posting or leaving it at the last known residential address of that person.*
		19.5	*No person issued with an Exclusion Notice in accordance with byelaw 19.4, without Permission, shall:* *19.5.1 if present at the Airport when issued with that Exclusion Notice, fail to immediately leave the Airport; or* *19.5.2 enter the Airport at any time during the Exclusion Period set out in that Exclusion Notice*
2.16	*No person shall organise or take part in any public assembly, demonstration or procession likely to obstruct or interfere with the proper use of the airport or obstruct or interfere with the comfort and convenience or safety of passengers or persons using the airport.*	8.8	*No person, without Permission, shall organise or take part in any public assembly, protest, demonstration or procession*
2.1	*No person shall tamper with any aircraft or anything that causes, or is likely to cause, damage to or interfere with the safe running or security of any aircraft.*	2.1	*No person, without Permission, shall operate, or interfere with, any Airport Infrastructure or Airport Equipment, or attempt to do so.*
		2.3	*No person shall damage, tamper with, intentionally or recklessly misuse, or intentionally or recklessly prevent the normal operation of, any Airport Infrastructure or Airport Equipment.*
		17.7	*No person shall tamper with any Aircraft or do anything that causes, or is likely to cause, damage to or interference with the safe running or security of any Aircraft.*
2.3	*No person shall enter or get on or attempt to enter or get on any vehicle or item of plant, machinery or other piece of equipment without permission.*	2.5	*No person shall enter, attempt to enter or mount, or use any Airport Equipment or Airport Infrastructure, other than in the ordinary course of its use and for a reasonable and proper purpose.*
2.12	*No person shall climb any wall, fence, barrier, railing, post, ladder or tower without permission.*	2.12	*No person, without Permission, shall climb any building, structure, wall, fence, barrier, railing, post, ladder or tower.*
2.21	*No person shall loiter on, frequent or remain on the airport or any part thereof without reasonable cause.*	8.2	*No person, without Permission, shall enter, loiter on frequent or remain at the Airport or any part of it other than for a reasonable and proper purpose.*

2.26	*No person shall distribute or display signs, advertisements, circulars or other printed or written matter without permission.*	8.9	*No person, without Permission, shall:* *8.9.1 display or erect any flags, banners, or signs; or* *8.9.2 wear or display any clothing, badges or emblems likely to cause harassment, alarm, distress or a breach of the peace.*
		8.10	*No persons (without lawful excuse) shall fail to remove from the Airport any flags, banners, signs or emblems displayed or erected by that person at the Airport after being asked to undertake such removal by an Airport Official or a Constable.*
		8.13	*No person, without Permission, shall distribute or display signs, advertisements, pamphlets, flyers, circulars or other printed or written matter.*

For ease of review, relevant definitions from the London Luton Airport Byelaws 2025 referred to above include:

1. **Airport Infrastructure**" means all buildings, structures, fixtures, fittings, services, cables, pipes, drains and other conduits, (whether portable or fixed) at the Airport including, but not limited to:

2.
   - 2.1 radio and other navigational aids for the purpose of controlling, guiding or assisting the operation of Aircraft either at the Airport or serving the Airport;
   - 2.2 walls, fences, railings, gates and barriers;
   - 2.3 lighting columns and lights;
   - 2.4 car park cameras, pay machines and entry or exit barriers;
   - 2.5 road traffic, no-waiting and unloading signs and other wayfinding;
   - 2.6 parking infringement enforcement equipment including cameras, Vehicles, automatic number plate recognition systems, and other equipment used for such purposes;
   - 2.7 public seating;
   - 2.8 fittings and equipment within toilets to which the public have access;
   - 2.9 fire alarm, fire detection, fire prevention, and fire-fighting equipment;
   - 2.10 closed circuit television cameras;
   - 2.11 baggage handling equipment;
   - 2.12 x-ray machines, conveyor systems, and all other equipment used for the purposes of security;
   - 2.13 any Vehicle used in connection with the operation of the Airport and any of its services or facilities;
   - 2.14 doors, escalators, lifts, and conveyor belts;
   - 2.15 telephone, radio, or other apparatus provided for transmitting and receiving messages;
   - 2.16 check-in desk and boarding gate desk equipment; and
   - 2.17 gas pipes, gas outlets, electric cables, fuse boxes and electric outlets.

3. "**Airport Equipment**" means all equipment, machinery, tools and Vehicles utilised by or on behalf of LLA, or another person, in connection with the operation of the Airport.

4. "**Airport Official**" means a person:
   - 4.1 employed or otherwise engaged by LLA, or by a contractor to LLA (including LLA's appointed air traffic controller), to work at the Airport from time to time;
   - 4.2 a person employed or otherwise engaged by Border Force or HM Revenue & Customs at the Airport from time to time; or
   - 4.3 a person otherwise authorised by LLA from time to time to act as an "airport official".

5. "**Airside**" means such parts of the Airport which are within the Security Perimeter from time to time, including those parts of a Public Terminal within the Security Perimeter and all gates, stands, aprons, taxiways and runways.

6. "**Landside**" means such parts of the Airport which are not within the Security Perimeter from time to time.

7. "**LLA**" means London Luton Airport Operations Limited or its successors as operator of the Airport.

8. "**Permission**" means the prior consent given by, or on behalf of, LLA (and such consent may include, where the context permits, permissions given verbally or in writing by Airport Officials, permissions set out in Notices, or consents or permission set out in agreements, permits, licences or leases entered into with, or issued by, LLA).

9. "**Security Area**" means each part of the Airport designated by LLA from time to time as a "security area", including all areas in which security screening and checking functions are undertaken by, or on behalf of, LLA.

10. "**Security Perimeter**" means the security perimeter at the Airport (as designated by LLA) which separates Airside locations (including "critical parts") from Landside locations.

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

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.

Schedule 1 ~~3~~ Plan Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-



(1) LEEDS BRADFORD AIRPORT LIMITED

AND THREE OTHERS

Claimants

- v -

KB-2024-002317

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex-parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the first witness statements: of Alexander James Wright dated 16 July 2024, 17 July 2024, (another) 17 July 2024; and 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden, Counsel for the Claimants and no one attending for the Defendants.

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

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to protestrequest@lba.co.uk.

DEFINITIONS

"**Leeds Bradford Airport**" means the land shown in red outlined in red on Plan 1 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

https://www.leedsbradfordairport.co.uk/injunction. at which copies of this Order may be viewed and downloaded).

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the First Defendant:

    a. Uploading a copy onto the following website: https://www.leedsbradfordairport.co.uk/injunction.

    b. Sending an email to each of the email addresses listed in Schedule 3 to this Order (1) stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and (2) attaching this Order.

    c. Affixing a notice at those locations marked with an "X" on Plan 1 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form of Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraph 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.

6. The Court will provide sealed copies of this Order to the First Claimant's solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3 and 4. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the First Defendant of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone 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 First Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.

13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE FIRST CLAIMANT

The First Claimant's solicitors and their contact details are:

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

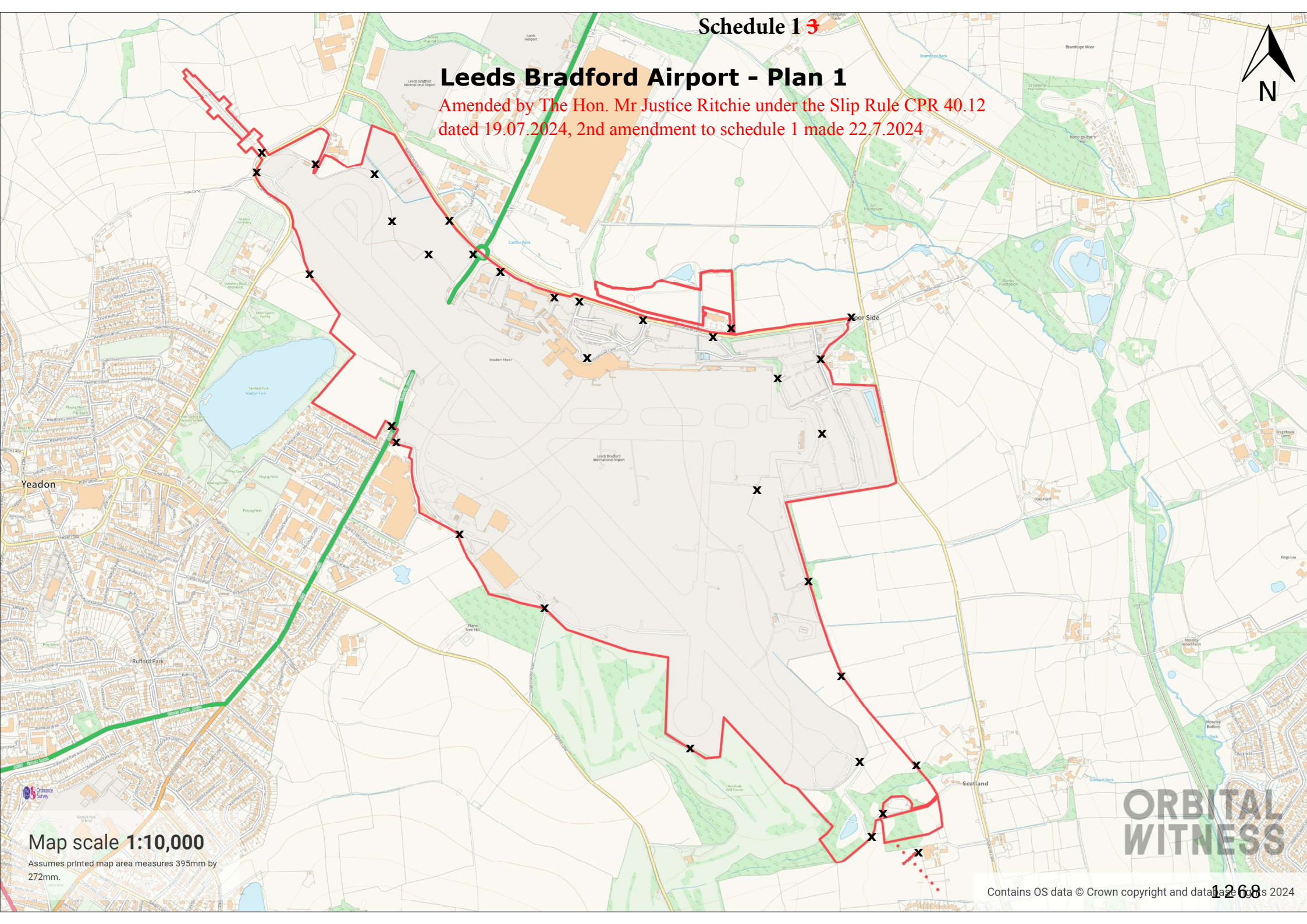
(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

Schedule 1 ~~3~~

Leeds Bradford Airport - Plan 1

Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12
dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024



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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant will take steps to serve the First Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The First Claimant 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Leeds Bradford Airport Limited (the "**First Claimant**")

This notice relates to the land known as Leeds Bradford Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

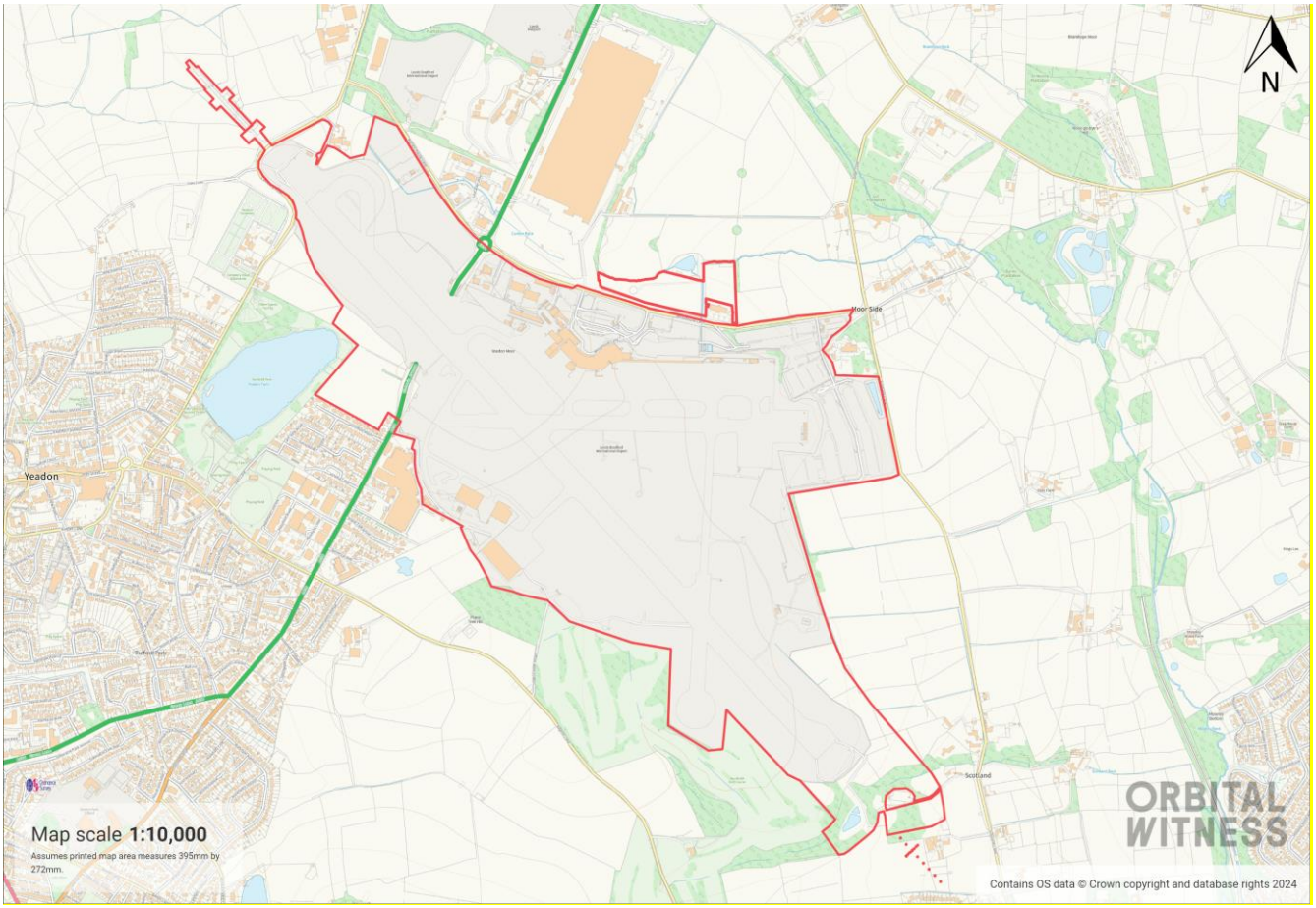
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: https://www.leedsbradfordairport.co.uk/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.


N
Yeadon
Moor Side
Scotland
Map scale 1:10,000
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
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CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-



(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

AND THREE OTHERS

Claimants

- v -

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 19 July 2024.

UPON the Claimants' claim by the Claim Form issued on 16 July 2024.

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, dated 17 July 2024, (and another) 17 July 2024 and dated 18 July 2024; Vincent Hodder dated 15 July 2024; Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants.

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

AND UPON the Second Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London Luton Airport, as defined by this Order, should be made by email to protestrequest@ltn.aero.

DEFINITIONS

"**London Luton Airport**" means the land shown in red outlined in red on Plan 2 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.london-luton.co.uk/corporate/lla-publications/injunction at which copies of this Order may be viewed and downloaded.

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of London Luton Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.

2. This Order is subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Second Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the Second Defendant:

    a. Uploading a copy onto the following website: https://www.london-luton.co.uk/corporate/lla-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 and attaching this Order.

    c. Affixing a notice at those locations marked with an "X" on Plan 2 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the Second Defendant and each of them.

6. The Court will provide sealed copies of this Order to the Second Claimant's solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the Second Defendant of any further applications or documents in the proceedings by the Second Claimant shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone 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 Second Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Second Claimant's solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second Claimant's solicitors.

13. The Second Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE SECOND CLAIMANT

The Second Claimant's solicitors and their contact details are:

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

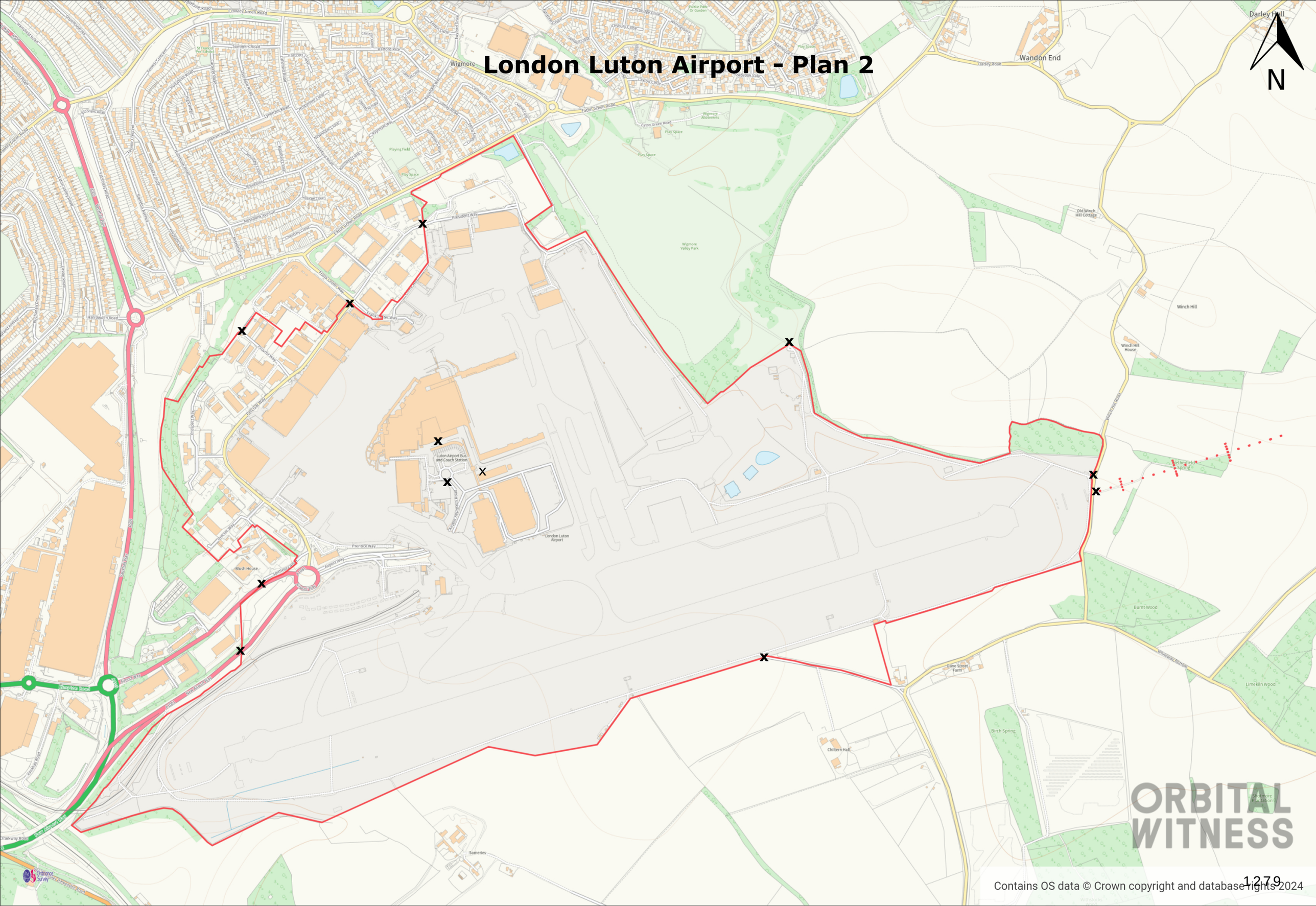
07712 881 393

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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

London Luton Airport - Plan 2



ORBITAL WITNESS

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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND CLAIMANT

(1) The Second Claimant will take steps to serve the Second Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The Second Claimant 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: London Luton Airport Operations Limited (the "**Second Claimant**")

This notice relates to the land known as London Luton Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.

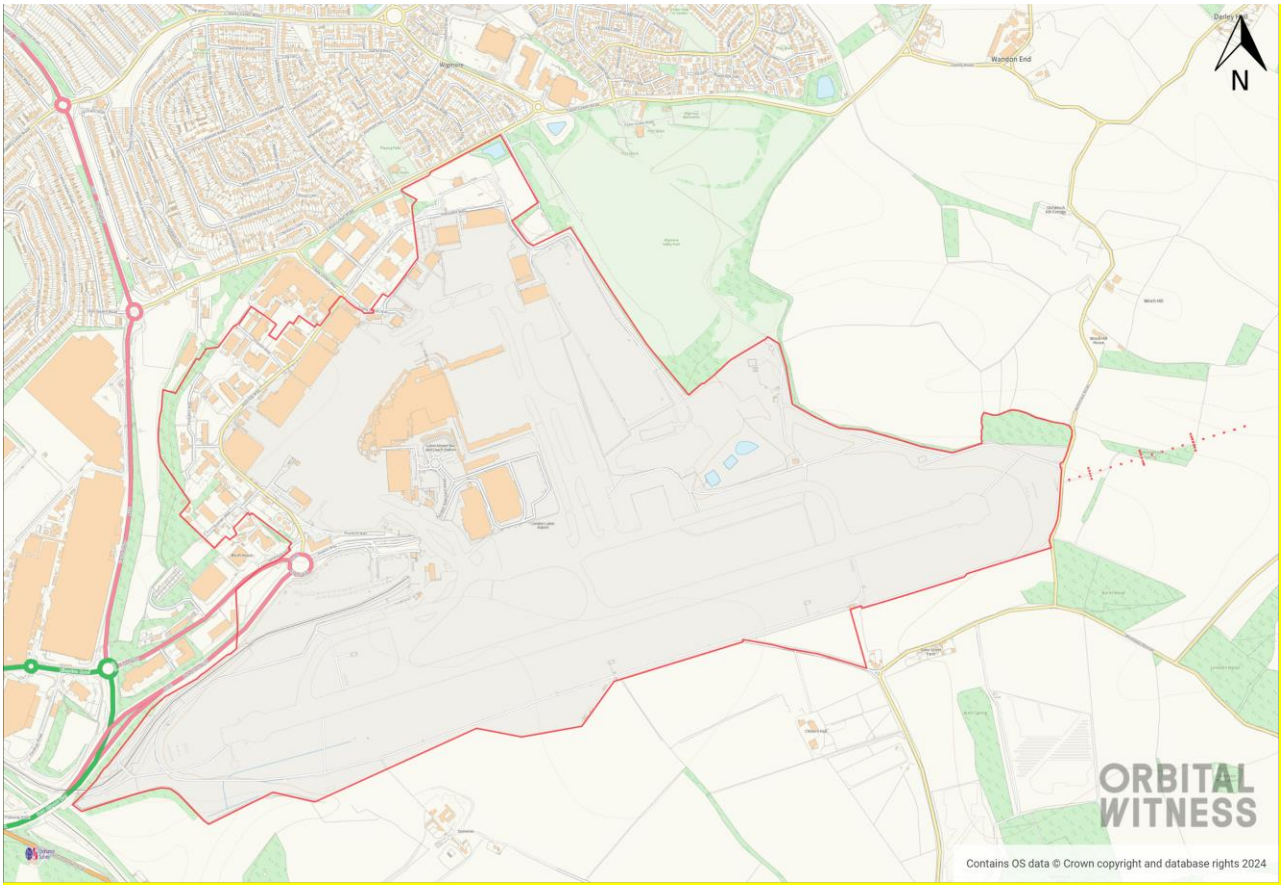
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Second Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: https://www.london-luton.co.uk/corporate/lla-publications/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.


N
Wandon End
ORBITAL
WITNESS
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CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-



(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

AND TWO OTHERS

Claimants

- v -

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE The Honourable Mr Justice Ritchie on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, 17 July 2024, (and another) 17 July 2024, dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants

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

AND UPON the Third and Fourth Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Newcastle International Airport, as defined by this Order, should be made by email to protestrequest@newcastleinternational.co.uk

DEFINITIONS

"**Newcastle International Airport**" means the land shown in red outlined in red on Plan 3 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.newcastleairport.com/about-your-airport/airport-company/injunction/ at which copies of this Order may be viewed and downloaded).

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Newcastle International Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants (or either of them).

2. This Order is subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Third and Fourth Claimants shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the Third Defendant:

    a. Uploading a copy onto the following website: https://www.newcastleairport.com/about-your-airport/airport-company/injunction/

    b. Sending an email with this Order attached 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. Affixing a notice at those locations marked with an "X" on Plan 3 setting out where these documents can be found and obtained in hard copy in the form of Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraph 3 shall be good and sufficient service of this Order and of the Claim Documents upon the Third Defendant and each of them.

6. The Court will provide sealed copies of this Order to the Third and Fourth Claimants' solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraphs 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the Third Defendant of any further applications or documents in the proceedings by the Third and Fourth Claimants shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone 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 Third and Fourth Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Third and Fourth Claimants' solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Third and Fourth Claimants' solicitors.

13. The Third and Fourth Claimants (or either of them) have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19.7.2024

COMMUNICATIONS WITH THE THIRD AND FOURTH CLAIMANTS

The Third and Fourth 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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Newcastle International Airport - Plan 3



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE THIRD AND FOURTH CLAIMANTS

(1) The Third and Fourth Claimants will take steps to serve the Third Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The Third and Fourth 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Newcastle International Airport Limited and NIAL Services Limited (the "**Third and Fourth Claimants**")

This notice relates to the land known as Newcastle International Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants.

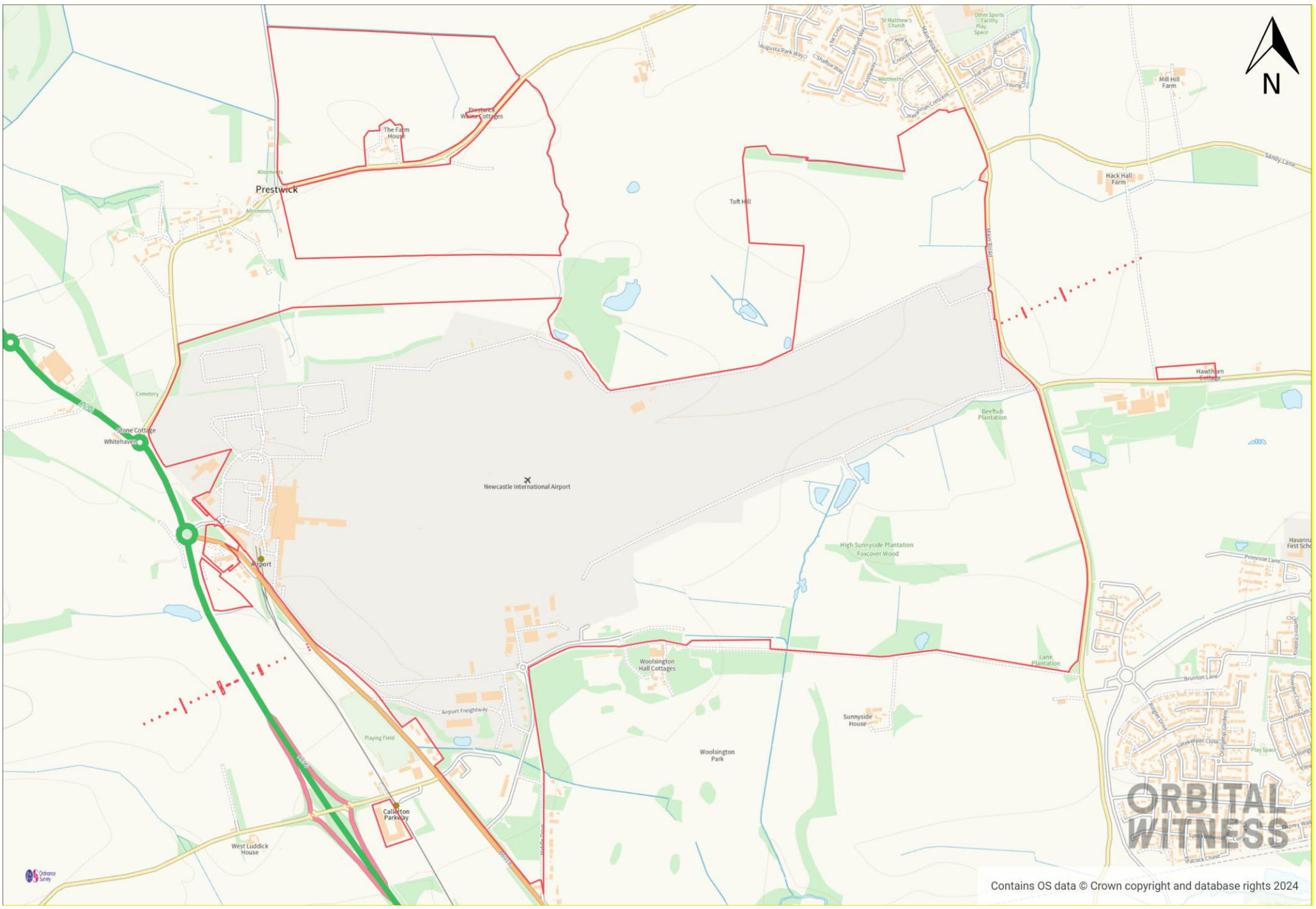
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Third and Fourth Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at:
https://www.newcastleairport.com/about-your-airport/airport-company/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

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.

Claim no: KB-2024-002317

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) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMIED
(4) NIAL SERVICES LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

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 19 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025

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 Ritchie J Order

IT IS ORDERED that:

1. The Ritchie J Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 2 of the Ritchie J Order).

2. Paragraph 2 of the Ritchie J Order is amended so as to read:

"This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-002317

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) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMIED
(4) NIAL SERVICES LIMITED

Claimants

-and-

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Defendants

ORDER

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Claim no: KB-2024-002317

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) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMIED
(4) NIAL SERVICES LIMITED

Claimants

-and-

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Defendants

ORDER

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AND UPON the Claimants' application dated 2 June 2025

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AND UPON reading the application and the witness evidence in support

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CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

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.

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)

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 Dienne 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

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

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

On 19 July 2024, the High Court granted us an injunction, which prohibits anyone from entering, occupying or remaining on Leeds Bradford Airport in connection with protesting about fossil fuels or the environment (whether in connection with Just Stop Oil or Extinction Rebellion or other campaign) without our permission.

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

1. Sealed Order
2. Hearing Bundle
3. Skeleton Argument
4. Note of the Hearing

2025 – Extension Application

On 24 June 2025, the High Court extended the injunction. Documents relating to the review hearing are available here.

1. Supplemental Hearing Bundle
2. Chronology
3. Skeleton Argument for Review Hearing
4. Sealed Order 24.06.2025
5. Judgement

Injunction

On 18 July 2024, the High Court granted an injunction which prohibits anyone from entering, occupying or remaining on London Luton Airport in connection with the Just Stop Oil campaign (or any other environmental campaign) without our permission.

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

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

Injunction Application 2024

Sealed Order 2024

Sealed Order granting permission to amend Claim Form etc.

Amended Claim Form

Plans 1-3 to the Claim Form

Amended Particulars of Claim

Hearing Bundle

Alex Wright - Second Witness Statement

Alex Wright - Third Witness Statement

Alex Wright - Fourth Witness Statement

Skeleton Argument

Note of the Hearing

Extension Application 2025

On 24 June 2025, the High Court extended the injunction.

Documents relating to the review hearing are available below.

Sealed Order 2025

Supplemental Hearing Bundle

Claimant's Skeleton Argument

Claimants' Chronology

Airport Injunction Renewal Transcript



Injunction

Injunction

Court Order 19.07.24

The Hearing Bundle Part 1

The Hearing Bundle Part 2

The Hearing Bundle Part 3

Skeleton Argument

Note of the Hearing

2025 Renewal Hearing

Court Order 24.06.25

Supplemental Hearing Bundle

Skeleton Argument

Chronology

Transcript of the Judgement

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
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(4) NIAL SERVICES LIMITED

Claimants

-and-

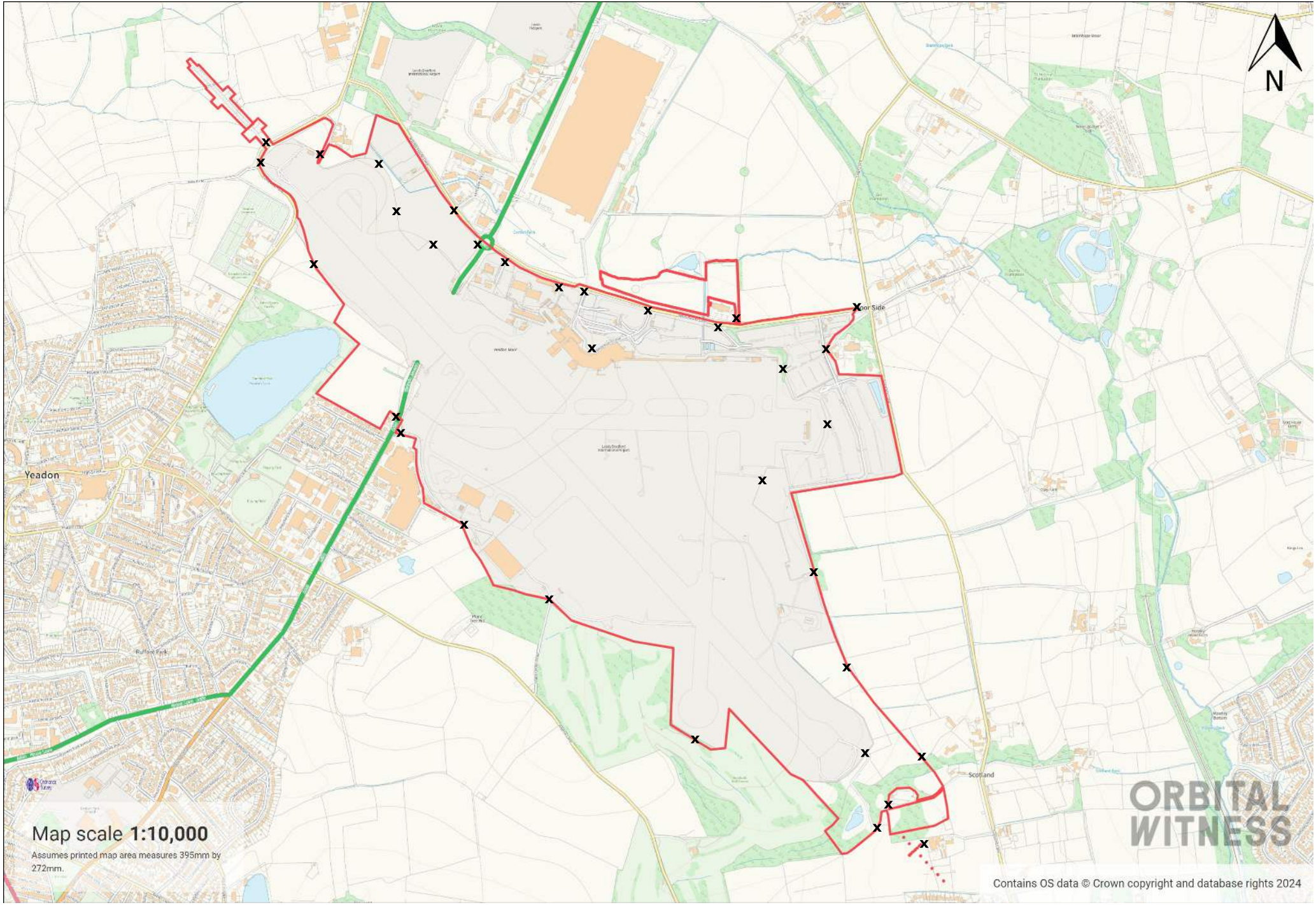
PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW5

This is the exhibit marked "AJW5" in the witness statement of Alexander James Wright.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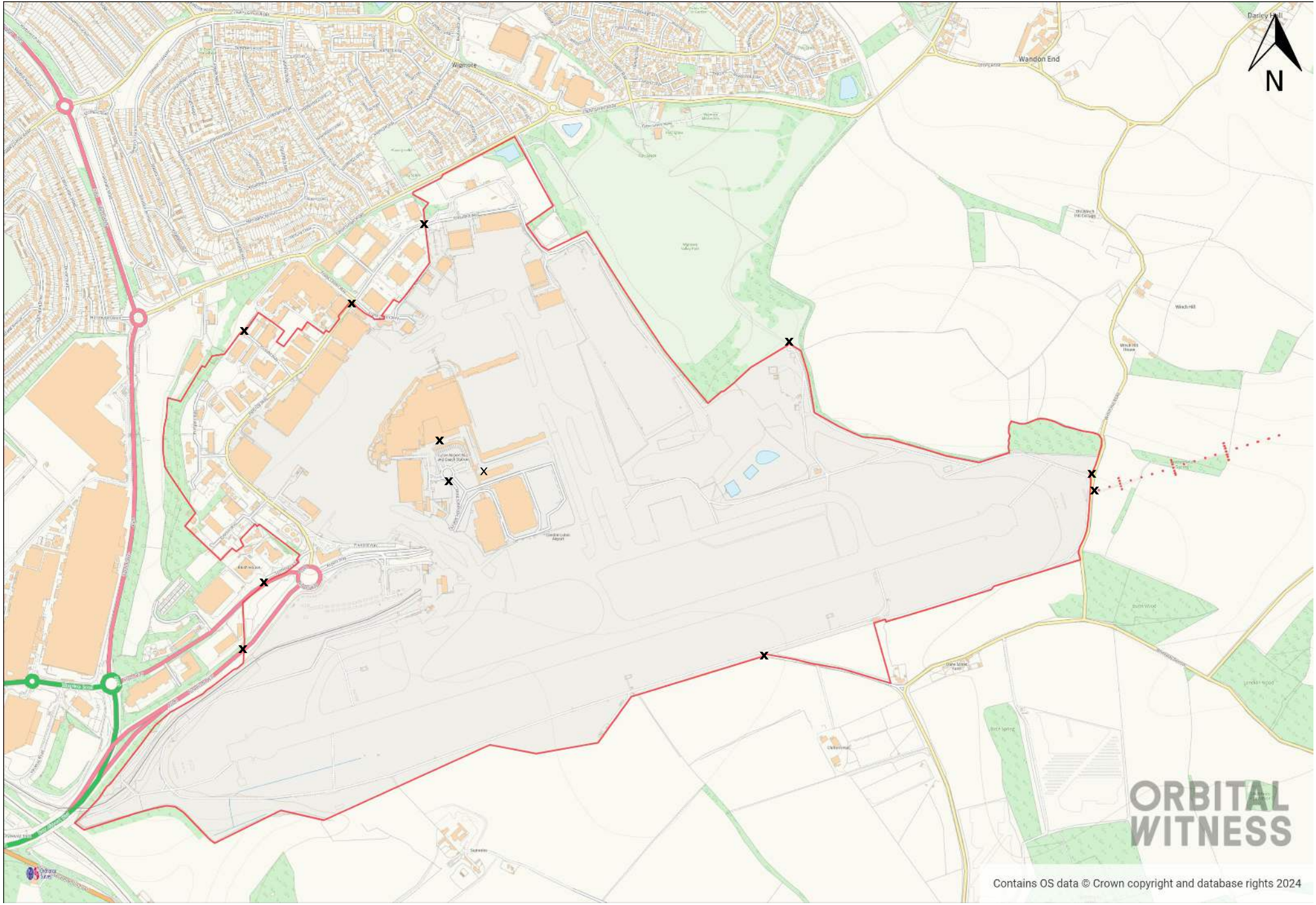
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Wandon End
Darley Hall
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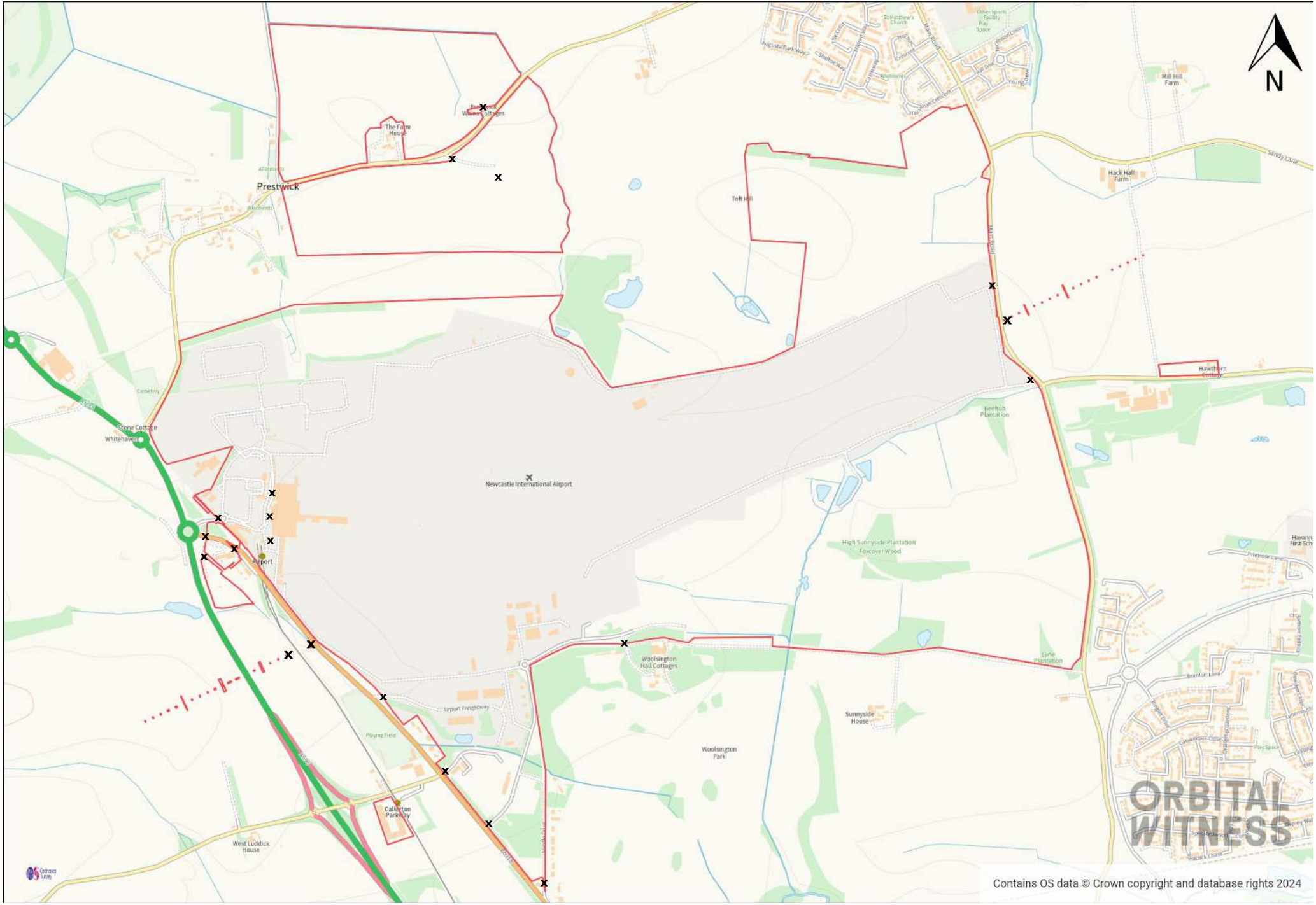
N
Prestwick
The Farm House
Toft Hill
Mill Hill Farm
Hack Hall Farm
Sandy Lane
Hawthorn Cottage
Beeftub Plantation
Newcastle International Airport
Stone Cottage
Whitehaven
Airport
High Sunnyside Plantation
Foxcover Wood
Woolsington Hall Cottages
Lane Plantation
Sunnyside House
Woolsington Park
Airport Freightway
Playing Field
Callerton Parkway
West Luddick House
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1323

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

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: Leeds Bradford Airport, London Luton Airport and Newcastle International Airport Injunction - Order from 2025 Review Hearing (24 June 2025)
Attachments: Leeds Bradford Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329804.1).pdf; London Luton Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329807.1).pdf; Newcastle International Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329809.1).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 injunctions granted in these proceedings by Order dated 19 July 2024 by Ritchie J.

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 each 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
Leeds Bradford Airport	KB-2024-2317	Injunction | Leeds Bradford Airport
London Luton Airport		Injunction | London Luton Airport
Newcastle International Airport		Injunction

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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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: Leeds Bradford Airport, London Luton Airport and Newcastle International Airport Injunction - Order from 2025 Review Hearing (24 June 2025)
Attachments: Leeds Bradford Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329804.1).pdf; London Luton Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329807.1).pdf; Newcastle International Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329809.1).pdf

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Leeds Bradford Airport	KB-2024-2317	Injunction | Leeds Bradford Airport
London Luton Airport		Injunction | London Luton Airport
Newcastle International Airport		Injunction

Regards

Alex Wright **|** Legal Director **|** Real Estate Disputes | Eversheds Sutherland

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www.eversheds-sutherland.com

Eversheds Sutherland
Helping our clients, our people and our communities to thrive

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

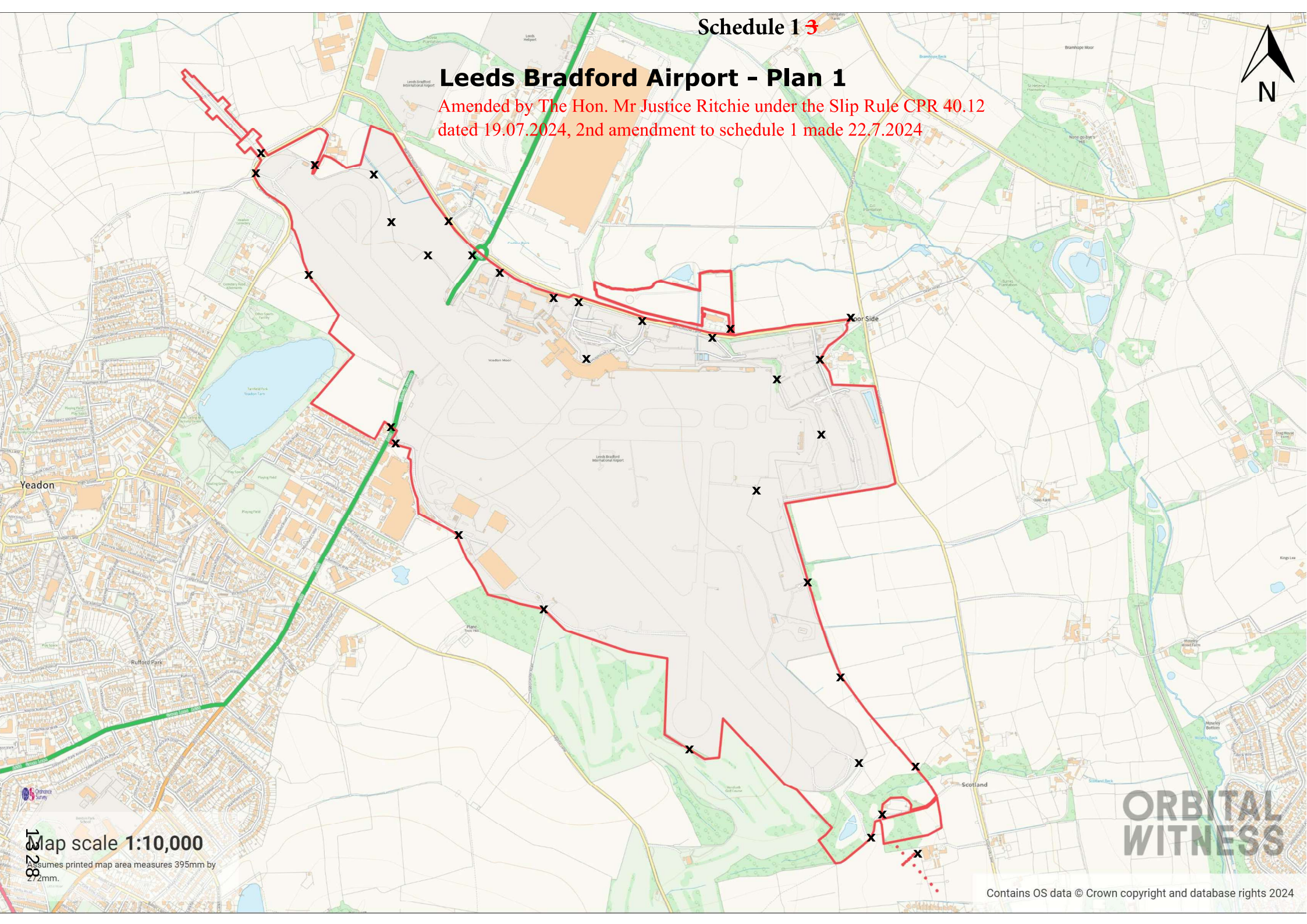
AJW7

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

Schedule 1 ~~3~~

Leeds Bradford Airport - Plan 1

Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12
dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024



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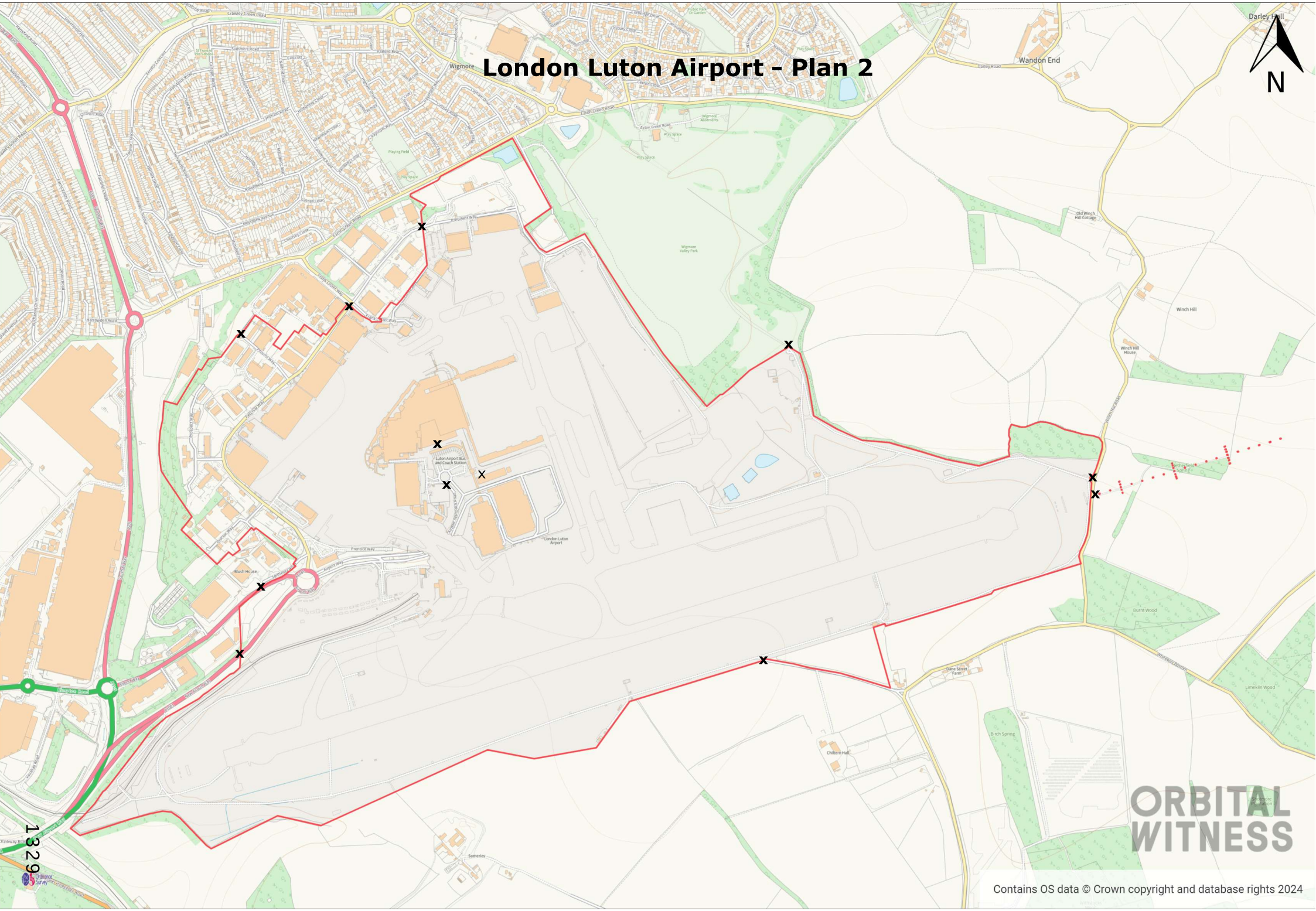
London Luton Airport - Plan 2



Newcastle International Airport - Plan 3



1330

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

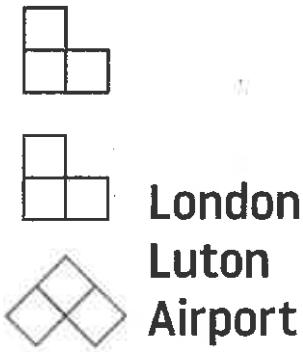
PERSONS UNKNOWN

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.



LONDON LUTON AIRPORT BYELAWS

July 2025

LONDON LUTON AIRPORT OPERATIONS LIMITED

BYELAWS 2025

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London Luton Airport Operations Limited, in exercise of the powers conferred on it by sections 63 and 64 of the Airports Act 1986, and in accordance with all other requirements, approvals and powers enabling it in that regard hereby makes the following byelaws which shall apply within the Airport.

PART 1 DEFINITIONS, INTERPRETATION AND APPLICATION

1.1 In these byelaws the following words shall have the following meanings:

1.1.1 "**Aeronautical Information Publication**" means the publication issued or otherwise made available by the United Kingdom's en-route air navigation service provider which sets out aeronautical information essential to air navigation in the United Kingdom;

1.1.2 **"Aircraft"** means a heavier than air power driven flying machine and includes, but is not limited to, aeroplane (land plane), aeroplane (seaplane), aeroplane (amphibian), aeroplane (self-launching motor glider), powered lift (tilt rotor) and rotorcraft (helicopter and gyroplane);

1.1.3 **"Aircraft Operator"** means in relation to any Aircraft the person who at the relevant time manages the operations of that Aircraft;

1.1.4 "**Aircraft Passenger**" means a person attending, or intending to attend, the Airport for the purpose of being carried on board an Aircraft which undertakes a flight that departs from, or arrives at, the Airport (except if that person is a member of the flight crew or cabin staff operating that Aircraft);

1.1.5 **"Airport"** means the area constituting London Luton Airport shown edged in red on the map at Schedule 1 of these byelaws;

1.1.6 **"Airport Infrastructure"** means all buildings, structures, fixtures, fittings, services, cables, pipes, drains and other conduits, (whether portable or fixed) at the Airport including, but not limited to:

1.1.6.1 radio and other navigational aids for the purpose of controlling, guiding or assisting the operation of Aircraft either at the Airport or serving the Airport;

1.1.6.2 walls, fences, railings, gates and barriers;

1.1.6.3 lighting columns and lights;

1.1.6.4 car park cameras, pay machines and entry or exit barriers;

1.1.6.5 road traffic, no-waiting and unloading signs and other wayfinding;

1.1.6.6 parking infringement enforcement equipment including cameras, Vehicles, automatic number plate recognition systems, and other equipment used for such purposes;

1.1.6.7 public seating;

1.1.6.8 fittings and equipment within toilets to which the public have access;

1.1.6.9 fire alarm, fire detection, fire prevention, and fire-fighting equipment;

1.1.6.10 closed circuit television cameras;

1.1.6.11 baggage handling equipment;

1.1.6.12 x-ray machines, conveyor systems, and all other equipment used for the purposes of security;

1.1.6.13 any Vehicle used in connection with the operation of the Airport and any of its services or facilities;

1.1.6.14 doors, escalators, lifts, and conveyor belts;

1.1.6.15 telephone, radio, or other apparatus provided for transmitting and receiving messages;

1.1.6.16 check-in desk and boarding gate desk equipment; and

1.1.6.17 gas pipes, gas outlets, electric cables, fuse boxes and electric outlets;

1.1.7 "**Airport Equipment**" means all equipment, machinery, tools and Vehicles utilised by or on behalf of LLA, or another person, in connection with the operation of the Airport;

1.1.8 **"Airport Manager"** means a person employed or otherwise engaged by LLA as an "airport manager", or in a senior management or executive position, from time to time;

1.1.9 **"Airport Official"** means a person:

1.1.9.1 employed or otherwise engaged by LLA, or by a contractor to LLA (including LLA's appointed air traffic controller), to work at the Airport from time to time;

1.1.9.2 a person employed or otherwise engaged by Border Force or HM Revenue & Customs at the Airport from time to time; or

1.1.9.3 a person otherwise authorised by LLA from time to time to act as an "airport official";

1.1.10 "**Airside**" means such parts of the Airport which are within the Security Perimeter from time to time, including those parts of a Public Terminal within the Security Perimeter and all gates, stands, aprons, taxiways and runways;

1.1.11 "**Airside Entrance Point**" means each part of the Airport as is designated by LLA from time to time (or a person authorised by LLA) for use as an entrance to an Airside location from a Landside location;

1.1.12 **"Airside Exit Point"** means each part of the Airport as is designated by LLA from time to time (or a person authorised by LLA) for use as an exit from an Airside location to a Landside location;

1.1.13 "**Animal**" means any animal, wild or domesticated, that is brought into the Airport;

1.1.14 "**Border Control Area**" each part of the Airport designated by LLA from time to time as a "border control area", including all areas in which border control and immigration checks

and functions are undertaken by UK Border Force;

1.1.15 **"Car Park"** means any area of the Airport designated by LLA:

1.1.15.1 for use by the public to wait in, or park, Vehicles; or

1.1.15.2 in which Vehicles are permitted to be used by the public to drop off or pick up any person;

1.1.16 **"Compliance Authority Identity Pass"** a valid and in date identification pass issued to a person who is categorised as Compliance Authority Personnel, which is issued in accordance with the requirements of Commission Implementing Regulation (EU) 2015/1998 of 5 November 2015 and the Single Consolidated Direction (Aviation) 2/2021;

1.1.17 **"Compliance Authority Personnel"** has the meaning set out in the Single Consolidated Direction (Aviation) 2/2021;

1.1.18 **"Constable"** means any person attested as such pursuant to section 29 of the Police Act 1996;

1.1.19 **"Crew Identity Pass"** a valid and in date crew identification pass issued to a member of crew working for an Aircraft operator operating at the Airport, which is issued in accordance with the requirements of Commission Implementing Regulation (EU) 2015/1998 of 5 November 2015 (and if the crew identification pass is issued by a UK registered airline, also in accordance with the Single Consolidated Direction (Aviation) 2/2021);

1.1.20 **"Customs Area"** each part of the Airport designated by LLA from time to time as a "customs area", including all areas in which customs checks and functions are undertaken by HM Revenue & Customs;

1.1.21 **"Emergency Services"** means the police, security, military, fire and ambulance services;

1.1.22 **"Emergency Vehicle"** means any Vehicle in use for operational purposes by any of the Emergency Services;

1.1.23 **"Exempt Person"** means a person who at the then current time:

1.1.23.1 is an Aircraft Passenger;

1.1.23.2 holds a Crew Identity Pass; or

1.1.23.3 holds a Compliance Authority Identity Pass;

1.1.24 **"Exclusion Notice"** means a written notice directing that a person not enter the Airport during the Exclusion Period set out in that written notice;

1.1.25 **"Exclusion Period"** such period, which may be indefinite, during which a person may not enter the Airport in accordance with byelaw 19.5, as determined by the Airport Manager or Constable issuing the relevant Exclusion Notice in accordance with byelaw 19.3;

1.1.26 **"Hazardous Substance"** means any substance (whether solid, liquid or gaseous) which is:

1.1.26.1 capable of causing an actionable nuisance whether alone or in combination

with one or more others; or

1.1.26.2 capable of polluting the environment or causing harm to human health, any living organism, ecosystem or property (including hydrocarbons);

1.1.27 "**ID Centre**" means the part of the Airport designated by LLA to be used in connection with the issue and collection of Identity Passes;

1.1.28 "**Identity Pass**" means a valid and in date Airport identification pass issued by LLA (or a person authorised by LLA) to the person identified on that identity pass;

1.1.29 "**Landside**" means such parts of the Airport which are not within the Security Perimeter from time to time;

1.1.30 **"LLA"** means London Luton Airport Operations Limited or its successors as operator of the Airport;

1.1.31 "**Lost Property Agent**" a person appointed by LLA to administer the collection and processing of Lost Property (and any other person engaged by that person to carry out such functions);

1.1.32 **"Lost Property"** means any item which is found on any part of the Airport operated by, or on behalf of, LLA, that is both unattended by a person who owns (or is otherwise in possession) of that item; and which does not have a proper purpose for being situated in the location in which it is found, but excluding:

1.1.32.1 any Vehicle;

1.1.32.2 any item found:

1.1.32.2.1 on board an Aircraft,

1.1.32.2.2 in a Vehicle not operated by or on behalf of LLA, or

1.1.32.2.3 on premises sublet to another person; or

1.1.32.3 any item that appears to have been thrown away, or otherwise discarded, as refuse;

1.1.33 **"Lost Property Office"** means the area designated by LLA for the collection of Lost Property;

1.1.34 "**Night**" means each period commencing at 23:00 on a day and ending at 07:00 on the following day;

1.1.35 "**NOTAM**" means a notice issued or otherwise made available by the United Kingdom's en-route air navigation service provider containing information concerning the establishment, condition or change in any aeronautical facility, service, procedure or hazard concerned with flight operations;

1.1.36 **"Notice"** means any method or means (whether fixed or moveable) of conveying warnings, information, requirements, terms, restrictions or prohibitions of any description including signs, display screens, road markings and written communications, issued by or on behalf of LLA, an Airport Official or a Constable;

1.1.37 "**Permission**" means the prior consent given by, or on behalf of, LLA (and such consent may include, where the context permits, permissions given verbally or in writing by Airport Officials, permissions set out in Notices, or consents or permission set out in agreements, permits, licences or leases entered into with, or issued by, LLA);

1.1.38 "**Pilot**" in relation to an Aircraft means the member of the flight crew designated as commander of that Aircraft by the relevant Aircraft Operator, or, if there is no such person, the person who is at the then current time the pilot in command of that Aircraft;

1.1.39 "**Private Hire Vehicle**" means a vehicle licensed by an appropriate licensing authority under section 48 of the Local Government (Miscellaneous Provisions) Act 1976 to be utilised as a private hire vehicle;

1.1.40 "**Public Terminal**" means the building or buildings at the Airport operated by LLA from which Aircraft Passengers transfer to and from Aircraft;

1.1.41 "**Regulator Standards**" means all standards, directions, rules, guidelines and codes (including "civil aviation publications") from time to time issued by the Civil Aviation Authority, UK Border Force, the Health and Safety Executive, the Department for Transport, and of any other relevant regulatory authority which apply to the operation of, or activities at, the Airport;

1.1.42 "**Road Traffic Enactments**" has the same meaning as in section 63(3) of the Airports Act 1986;

1.1.43 "**Security Area**" means each part of the Airport designated by LLA from time to time as a "security area", including all areas in which security screening and checking functions are undertaken by, or on behalf of, LLA;

1.1.44 "**Security Perimeter**" means the security perimeter at the Airport (as designated by LLA) which separates Airside locations (including "critical parts") from Landside locations;

1.1.45 "**Taxi**" means a hackney carriage licensed by the appropriate licensing authority under section 37 of the Town Police Clauses Act 1847 to be utilised to ply for hire within an area that includes the Airport; and

1.1.46 "**Vehicle**" means any mechanically or manually propelled vehicle or machinery, or any wheeled apparatus designed to be towed by another vehicle, including cars, vans, lorries, mobile homes, mobile plant, caravans, motorbikes, scooters, bicycles and trailers.

1.2 These byelaws may be cited as the London Luton Airport Byelaws 2025.

1.3 These byelaws shall apply throughout the Airport, except to the extent otherwise set out in these byelaws.

1.4 In these byelaws:

1.4.1 the inclusion of a byelaw under a particular heading does not limit the scope of that byelaw to the subject matter of the heading; and

1.4.2 in every case where a byelaw permits a person to commit an act or omission if Permission is granted to that person, it shall be a breach of that byelaw if that act is committed, or that

omission occurs, contrary to the terms or extent of that Permission.

1.5 No provision in these byelaws shall apply to any Airport Official or any member of the Emergency Services when acting properly in the course of their duty, or to any Vehicle or Emergency Vehicle being used by any Airport Official or any member of the Emergency Services acting properly in the course of their duty.

1.6 In any proceedings concerning a defendant's contravention of these byelaws, it shall be a defence to prove that at the time of such contravention that the defendant:

1.6.1 was an Airport Official or a member of the Emergency Services acting properly in the course of their duty; or

1.6.2 was acting properly upon the instruction or with the authority of an Airport Official or a Constable.

PART 2 INTERFERENCE WITH AIRPORT INFRASTRUCTURE AND AIRPORT ACTIVITIES

2.1 No person, without Permission, shall operate, or interfere with, any Airport Infrastructure or Airport Equipment, or attempt to do so.

2.2 No person, without Permission, shall enter into any area in which construction works are being undertaken, or otherwise interfere with any construction works or attempt to do so.

2.3 No person shall damage, tamper with, intentionally or recklessly misuse, or intentionally or recklessly prevent the normal operation of, any Airport Infrastructure or Airport Equipment.

2.4 No person shall activate or use any alarm, emergency stop control switch or lever, emergency door release, fire-fighting equipment, or emergency equipment other than for a reasonable and proper purpose.

2.5 No person shall enter, attempt to enter or mount, or use any Airport Equipment or Airport Infrastructure, other than in the ordinary course of its use and for a reasonable and proper purpose.

2.6 No person shall operate or use any radio transmitter, or other thing capable of radiating or generating electrical interference, in such a way as to interfere with the operation of any Aircraft, Airport Infrastructure or Airport Equipment, other than with Permission (and only then, in the ordinary course of its use and for a reasonable and proper purpose).

2.7 No person, without Permission, shall undertake any works of construction, maintenance or repair to any Airport Infrastructure or Airport Equipment.

2.8 No person, without Permission, shall operate or use any item of Airport Infrastructure or Airport Equipment that that person knows, or ought reasonably to know, is in an unsafe condition.

2.9 No person shall take any baggage trolley, pushchair, wheelchair, or other mobility aid provided by LLA (or a person authorised by LLA) outside of the Airport, or leave or store any such item of equipment other than in a location designated by LLA (or a person authorised by LLA) for that purpose.

2.10 No person, without Permission, shall deface, displace, move, remove, or otherwise interfere with any Notice or advertisement.

2.11 No person, without Permission, shall operate, or cause to be operated, any vehicle, drone or aircraft which is unmanned (whether operated autonomously or controlled remotely).

2.12 No person, without Permission, shall climb any building, structure, wall, fence, barrier, railing, post, ladder or tower.

2.13 No person, without Permission, shall erect or place any structure, apparatus, container or equipment within three meters of the Security Perimeter.

PART 3 COMPLIANCE WITH THE PROPER FUNCTIONING OF THE AIRPORT

3.1 No person, without Permission, shall fail to comply with:

3.1.1 any reasonable instruction given to them by an Airport Official or by a Constable in connection with the proper functioning of the Airport (including the operation of an Aircraft);

3.1.2 all Regulator Standards; and

3.1.3 all Notices which are applicable to that person, or the activities undertaken, or intended to be undertaken, by that person.

3.2 No person shall fail to state their correct name, address and purpose for being at the Airport upon request by an Airport Official or Constable.

3.3 No Aircraft Passenger shall fail to produce on demand to an Airport Official or Constable:

3.3.1 proof of that Aircraft's Passenger's entitlement to be carried on board an Aircraft which is scheduled to undertake, or has undertaken, a flight that departs from, or arrives at, the Airport; and

3.3.2 a form of photographic identification issued by a national authority confirming that Aircraft Passenger's identity.

3.4 No person shall fail to immediately evacuate a part of the Airport if:

3.4.1 instructed to do so by an Airport Official, a member of the Emergency Services or by Notice; or

3.4.2 if an alarm is sounded to evacuate that part of the Airport.

3.5 No person shall obstruct an Airport Official or a member of the Emergency Services from acting properly in the course of their duty.

3.6 No person shall fail to submit to a personal search, or to a search of their belongings, Vehicle, or any other item under their control, on demand by an Airport Official or Constable, if that Airport Official or Constable:

3.6.1 has a reasonable suspicion that the individual is about to commit, has committed or is committing a criminal offence (including a breach of these byelaws); or

3.6.2 that search is properly required to be undertaken by that Airport Official or Constable in the course of their duty.

3.7 No person (without lawful excuse) shall fail to immediately remove from the Airport a Vehicle, Animal, or item which has been brought into the Airport by that person:

3.7.1 if its presence is forbidden by Notice; or

3.7.2 after having been instructed to remove it from the Airport by an Airport Official or a member of the Emergency Services.

3.8 No person (without lawful excuse) shall fail to immediately move a Vehicle, Animal or item brought into the Airport by that person, to such other part of the Airport as an Airport Official or member of the Emergency Services directs.

PART 4 RESTRICTED ACCESS

4.1 No person, without Permission, shall enter, or attempt to enter, an Airside location other than through an Airside Entrance Point (except if such entry occurs whilst being carried on board an Aircraft landing at the Airport).

4.2 No person, without Permission, shall exit, or attempt to exit, an Airside location other than through an Airside Exit Point (except if such exit occurs whilst being carried on board an Aircraft taking off from the Airport).

4.3 No person shall fail to submit themselves, or any items in their possession, for any properly conducted security checks, procedures or screening conducted by an Airport Official or a Constable.

4.4 No person, without Permission, shall enter or remain in an Airside location other than for a reasonable and proper purpose.

4.5 No person, without Permission, shall take an item into, or otherwise cause an item to enter or be left in, an Airside location, if that item, or type of item, is designated by LLA as being prohibited from being taken into, or otherwise entering, an Airside location.

PART 5 IDENTITY PASSES

5.1 LLA may at any time, at its discretion:

5.1.1 issue an Identity Pass to any person; or

5.1.2 remove or revoke an Identity Pass issued to any person;

and shall not be liable to any person for any loss or damage arising as a consequence of LLA's issue, removal or revocation of an Identity Pass in accordance with these byelaws.

5.2 No person (other than an Exempt Person) shall enter, remain or work in any Airside location, unless:

5.2.1 that person holds an Identity Pass which permits that person access to the relevant Airside location, or

5.2.2 that person is escorted at all times by another person with an Identity Pass that permits that other person access to the relevant Airside location.

5.3 No person, without Permission, may escort another person in any Airside location.

5.4 No person who holds an Identity Pass, Crew Identity Pass or Compliance Authority Identity Pass shall fail at all times to wear, each such pass at chest or shoulder height on outer clothing whilst present at the Airport.

5.5 No person, to the extent requested by an Airport Official or a Constable, shall fail to surrender or produce on demand an Identity Pass held by that person to that Airport Official or Constable.

5.6 No person who is issued with an Identity Pass shall fail to inform an Airport Official working in the ID Centre as soon as practicable if that Identity Pass is lost or stolen.

5.7 No person who is issued with an Identity Pass, without Permission, shall:

5.7.1 give that Identity Pass to any other person other than for a reasonable and proper purpose; or

5.7.2 permit that Identity Pass to be used by any other person.

PART 6 ALCOHOL, DRUGS AND INTOXICATION

6.1 No person shall consume alcohol, or be in possession of any open alcohol container, in any public areas of the Airport, except in such parts of the Airport as are designated by LLA for the sale or consumption of alcohol.

6.2 No person shall consume or continue to consume alcohol, or take or continue to take any non-prescribed intoxicating drug, when requested by an Airport Official or a Constable to desist, provided that that Airport Official or Constable has reasonable cause to believe that such person is intoxicated.

6.3 No person who holds an Identity Pass, Crew Identity Pass or Compliance Authority Identity Pass, shall attend the Airport, or continue to remain at the Airport, in the course of performing their duties whilst intoxicated with a quantity of alcohol or drugs which causes them to be unfit to properly perform their duties.

6.4 No person who holds an Identity Pass, Crew Identity Pass or Compliance Authority Identity Pass, whilst attending the Airport in the course of their duties, shall fail to submit to a test for alcohol or drugs on demand by an Airport Official or Constable, if:

6.4.1 that Airport Official or Constable has a reasonable suspicion that that person has alcohol or a drug in their body and is unfit to properly perform their duties; or

6.4.2 that person has been involved in an incident which caused, or gave rise to a danger of causing, injury to another person or damage to property.

PART 7 OFFENSIVE BEHAVIOUR

7.1 No person, without Permission, shall deface (whether by graffiti or otherwise) or damage any Airport Infrastructure, Airport Equipment, item, or any other property (including buildings, structures, fixtures, fittings, services, cables, pipes, drains and other conduits), equipment, machinery, tools or Vehicles which are owned by another person (other than with the consent of that owner).

7.2 No person shall use any language or make any gesture or commit any other act which is lewd, foul or offensive.

7.3 No person shall conduct themselves in a disorderly manner or behave in a manner which causes or may cause undue distress or offence to any other person.

7.4 No person shall intentionally spit, urinate or defecate other than in a functioning toilet.

7.5 No person shall cause any other person to reasonably suspect, by any language or behaviour, by wearing any clothing or emblems, or carrying any signs or items, that there is a threat of:

7.5.1 terrorism (as defined by the Terrorism Act 2000) or other security threat at the Airport (including falsely asserting that that person or another person has in their possession an item which is prohibited by Notice from being taken Airside); or

7.5.2 public protest, demonstration or procession (for which Permission has not been granted) or public disorder;

if that person has no reasonable cause to believe that such threat exists.

PART 8 PROHIBITED BEHAVIOUR

8.1 No person, without Permission, shall leave baggage, or any other item, which that person has brought into the Airport or which is otherwise in that person's possession, unattended in any part of the Airport (unless it is left in an area designated for that purpose by LLA, or if it has been properly given over to the possession of another person).

8.2 No person, without Permission, shall enter, loiter on, frequent or remain at the Airport or any part of it other than for a reasonable and proper purpose.

8.3 No person, without Permission, shall walk on any grassed or cultivated area.

8.4 No person, without Permission, shall behave in such a way so as to endanger themselves or any other person.

8.5 No person, without Permission, shall walk on any part of the Airport which is not designated by LLA for pedestrian use (including any road other than in the proper course of using a pedestrian crossing point marked for that purpose).

8.6 No person, without Permission, shall sing, dance, shout, play a musical instrument or erect or use any apparatus for transmission, receipt, recording, reproduction or amplification of sound, speech or images.

8.7 No person, without Permission, shall engage in, or facilitate, gambling, betting, wagering, bookmaking or other similar activity.

8.8 No person, without Permission, shall organise or take part in any public assembly, protest, demonstration or procession.

8.9 No person, without Permission, shall:

8.9.1 display or erect any flags, banners, or signs; or

8.9.2 wear or display any clothing, badges or emblems likely to cause harassment, alarm, distress or a breach of the peace.

8.10 No persons (without lawful excuse) shall fail to remove from the Airport any flags, banners, signs or emblems displayed or erected by that person at the Airport after being asked to undertake such removal by an Airport Official or a Constable.

8.11 No person, without Permission, shall take any photograph, or undertake any filming, live streaming, broadcast or recording activity in:

8.11.1 any area in the course of that person's trade or profession, for monetary reward, or for any other commercial or business purpose; or

8.11.2 any part of a Security Area, Customs Area, or Border Control Area for any purpose.

8.12 No person, without Permission, shall fail to permanently erase from an item under their control any recording or image of:

8.12.1 any part of a Security Area, Customs Area or Border Control Area; or

8.12.2 any Airport Official or Constable acting properly in the course of their duty;

including on demand by an Airport Official or Constable.

8.13 No person, without Permission, shall distribute or display signs, advertisements, pamphlets, flyers, circulars or other printed or written matter.

8.14 No person, without Permission, shall undertake any market research for any purpose.

8.15 No person, without Permission, shall beg or solicit funds or contributions of any kind.

8.16 No person, without Permission, may enter a Car Park or any other part of the Airport, except for the purposes of:

8.16.1 parking a Vehicle in that Car Park;

8.16.2 collecting a Vehicle from that Car Park; or

8.16.3 picking up or dropping off a person using a Vehicle in that Car Park.

8.17 No person, without Permission, shall charge any device, equipment or Vehicle utilising the Airport Infrastructure.

8.18 No person, without Permission, shall:

8.18.1 erect, or sleep in, a tent, or sleep in any Vehicle (including any trailer or caravan); or

8.18.2 sleep in any other part of the Airport (except for an Aircraft Passenger scheduled to depart the Airport on an Aircraft within the following 6 hours).

8.19 No person, without Permission, shall use skateboards, roller blades, roller skates, scooters or any similar device within a Public Terminal or any Airside area (except for mobility aids, mobility scooters and wheelchairs used by a person with reduced mobility).

PART 9 LITTER AND WASTE

9.1 No person, without Permission, shall drop or leave litter, waste or refuse except in a receptacle provided

for the purpose.

9.2 No person, without Permission, shall place any waste or refuse container on any part of the Airport and, if with Permission, only then in a location designated by LLA for such purpose.

9.3 No person, without Permission, shall, deposit any construction waste or excavated materials.

9.4 No person, without Permission, shall use any open refuse containers (other than litter bins for the disposal of litter) or skips.

9.5 No person, without Permission, shall cause anything other than surface water to be discharged into the surface water drains.

PART 10 ANIMALS

10.1 No person, without Permission, shall bring an Animal into a Public Terminal other than:

10.1.1 assistance dogs;

10.1.2 dogs under the control of an Airport Official or a member of the Emergency Services; or

10.1.3 Animals which have been approved for travel by an Aircraft Operator or an Airport Official.

10.2 No person in charge of an Animal shall:

10.2.1 fail to keep it under control, or permit it to foul on any part of the Airport (provided it shall be a defence for a person contravening this byelaw to demonstrate that they took all reasonable precautions and exercised all due diligence to avoid a contravention of this byelaw); or

10.2.2 fail to remove from the Airport, or dispose of in an appropriate waste receptacle, any faeces defecated by that Animal at the Airport.

10.3 No person, without Permission, shall bring a horse on to the Airport, or otherwise ride or lead a horse at the Airport.

10.4 No person in charge of an Animal, without Permission, shall allow that Animal to graze.

10.5 No person, without Permission, shall interfere with, trap, remove, harm or damage any wild fauna or flora.

PART 11 UNAUTHORISED TRADE

11.1 No person, without Permission, shall conduct any business or any form of trading activity at the Airport (including offering for sale, selling or distributing goods or services).

11.2 No person, without Permission, shall personally solicit or tout for business at the Airport.

PART 12 SMOKING AND HAZARDOUS SUBSTANCES

12.1 No person shall smoke or use an electronic cigarette other than in an area designated by LLA for such purpose.

12.2 No person shall smoke in or otherwise bring into or light any naked flame or create sparks in:

12.2.1 any place where any such act is prohibited by Notice;

12.2.2 any place within 15 metres of any Aircraft; or

12.2.3 any place where liquid fuel, gas, explosives or other highly flammable material is stored or used.

12.3 No person, without Permission, shall cause by any act or omission a fire to be lit.

12.4 No person, without Permission, shall fill or discharge liquid fuel, including in the course of refuelling any Vehicle or Aircraft, other than in a place designated for that purpose by LLA.

12.5 No person, without Permission, shall store, transport or handle any Hazardous Substance.

12.6 No person shall store, transport or handle any Hazardous Substance in a condition or manner likely to result in a discharge prohibited in accordance with byelaw 12.7.

12.7 No person, without Permission, shall cause or permit the discharge onto any surface of any:

12.7.1 Hazardous Substance, or

12.7.2 other substance of whatever nature which might obstruct or be or become a source of damage to drains, sewers or other Airport Infrastructure.

12.8 No person shall fail to adhere to any applicable safety requirements, including the use of suitable personal protective equipment, which they are directed to adhere to by an Airport Official, member of the Emergency Services or as out in any applicable Notice.

PART 13 PROHIBITED ACTS INVOLVING VEHICLES ON PARTS OF THE AIRPORT TO WHICH THE ROAD TRAFFIC ENACTMENTS DO NOT APPLY

13.1 No person in charge of a Vehicle, without Permission, shall on any part of the Airport to which the Road Traffic Enactments do not apply:

13.1.1 drive a Vehicle if it would be unlawful for that person to drive that Vehicle on a road to which the Road Traffic Enactments do apply; or

13.1.2 commit any act or omission whilst driving, parking or leaving that Vehicle which would be unlawful on a road to which the Road Traffic Enactments do apply.

PART 14 PROHIBITED ACTS INVOLVING VEHICLES ON ALL PARTS OF THE AIRPORT

14.1 No person, without Permission, shall:

14.1.1 wash any Vehicle other than in an area designated by LLA for such purpose; or

14.1.2 undertake maintenance or repair work to any Vehicle.

14.2 A person in charge of a Vehicle which is not in a roadworthy condition or has broken down shall as soon as reasonably practicable procure that such Vehicle is removed from the Airport.

14.3 No person, without Permission, shall wait in, leave or park a Vehicle:

14.3.1 within three metres of the Security Perimeter, except in a marked parking bay;

14.3.2 within three metres of a Public Terminal, except in a marked parking bay; and

14.3.3 other than in accordance with all applicable Notices.

14.4 No person, without Permission, in charge of a Vehicle shall:

14.4.1 bring that Vehicle into the Airport if it is in an unsafe condition;

14.4.2 park or leave that Vehicle:

14.4.2.1 in any part of the Airport, other than in a part of the Airport in which that type of Vehicle is permitted to be parked or left in in accordance with one or more applicable Notices;

14.4.2.2 other than in a marked parking space or in accordance with any applicable Notice; or

14.4.2.3 in an unsafe condition, or in such a way so as to create or likely to create a hazard or obstruction to other persons or Vehicles, an impairment to the operation of the Airport or a risk to the security of the Airport; or

14.4.3 permanently abandon that Vehicle;

14.4.4 drop off passengers from that Vehicle, other than in a part of the Airport in which that type of Vehicle is permitted to be used to drop-off passengers in accordance with one or more applicable Notices;

14.4.5 pick-up passengers with that Vehicle, other than in a part of the Airport in which that type of Vehicle is permitted to be used to pick-up passengers in accordance with one or more applicable Notices; or

14.4.6 drive that Vehicle, other than on a road to which the public has access or a part of the Airport in which that type of Vehicle is permitted to be driven in accordance with one or more applicable Notices.

14.5 Where an incident occurs which involves damage to a Vehicle, or a Vehicle causing injury to another person or damage to other property, if present at the time of that incident the person in charge of that Vehicle, and any other person involved in the incident, shall stop and give:

14.5.1 their name and address;

14.5.2 details of the incident; and

14.5.3 if that person is the person in charge of that Vehicle:

14.5.3.1 the name and address of the person who was the owner of the Vehicle at the time of the incident; and

14.5.3.2 the vehicle registration number of that Vehicle;

to an Airport Official or a Constable, as soon as practicable after the incident.

14.6 No person in charge of a Vehicle shall fail to produce to an Airport Official or a Constable, within seven

days of demand, details of the insurance for the operation of that Vehicle which is required to be in place in accordance with the Road Traffic Enactments.

14.7 No person in charge of a Vehicle shall fail to control or park that Vehicle other than in accordance with any applicable Notice, or a direction given by an Airport Official or a Constable.

PART 15 LAWFUL REMOVAL OF VEHICLES FROM THE AIRPORT

15.1 For the purposes of Section 54 of the Protection of Freedoms Act 2012, any Airport Official or Constable has authority, conferred by these byelaws, to move a Vehicle by any means if that Vehicle is:

15.1.1 situated in an area where that type of Vehicle is not permitted to be parked or left in, in accordance with one or more applicable Notices;

15.1.2 left in a manner (including outside of marked parking bay) contrary to any applicable Notices;

15.1.3 in the reasonable opinion of an Airport Official or Constable, is in an unsafe condition or creates or likely to creates a hazard or obstruction to other persons or Vehicles, an impairment to the operation of the Airport or a risk to the security of the Airport; or

15.1.4 in the reasonable opinion of any Airport Official or Constable has been permanently abandoned.

PART 16 TAXIS & PRIVATE HIRE VEHICLES

16.1 No person, without Permission, shall offer a Vehicle (including a Taxi or Private Hire Vehicle) for hire to another person at the Airport.

16.2 No person in charge of a Taxi or Private Hire Vehicle, without Permission, shall use that Vehicle to drop off passengers from that Vehicle, or pick-up passengers with that Vehicle.

16.3 No person in charge of a Vehicle, may:

16.3.1 permit that Vehicle to be used as a Taxi without that person holding a licence issued by an appropriate public authority which lawfully permits that person to operate that Vehicle as a Taxi within the area in which the Airport is situated; or

16.3.2 permit that Vehicle to be used as a Private Hire Vehicle without that person holding a licence issued by an appropriate public authority which lawfully permits that person to operate that Vehicle as a Private Hire Vehicle within the area in which the Airport is situated.

PART 17 AIRSIDE OPERATIONS

17.1 No person, other than an Aircraft Passenger (whilst being escorted by a person holding an Identity Pass), shall enter or remain in any outdoor area located Airside without wearing a high-visibility vest or jacket at all times.

17.2 No person, without Permission, shall drive a Vehicle in an Airside area without:

17.2.1 a reasonable and proper purpose for doing so;

17.2.2 holding an airside driving permit, issued by or on behalf of LLA, which permits that person

to drive a Vehicle in that Airside area; and

17.2.3 an airside vehicle permit having been issued by or on behalf of LLA in respect of that Vehicle, which permits that Vehicle to be driven in that Airside area.

17.3 No person in charge of a Vehicle being driven in an Airside area, shall fail to produce on demand to an Airport Official or a Constable:

17.3.1 airside driving permit, issued by or on behalf of LLA to that person; or

17.3.2 an airside vehicle permit which has been issued by or on behalf of LLA in respect of that Vehicle.

17.4 No person shall pass on foot or drive a Vehicle within close proximity to the rear of an Aircraft while it is displaying collision lights indicating that it is about to be pushed back.

17.5 No person shall loiter near, or climb upon, or enter any Aircraft, or attempt to do so, without Permission, lawful authority, or the permission of the Pilot of that Aircraft.

17.6 No person shall deliberately damage any Aircraft, without Permission, lawful authority, or the permission of the owner of that Aircraft.

17.7 No person shall tamper with any Aircraft or do anything that causes, or is likely to cause, damage to or interference with the safe running or security of any Aircraft.

17.8 No person, without Permission, shall:

17.8.1 move an Aircraft; or

17.8.2 park an Aircraft in a location, other than a location allocated by an Airport Official for that Aircraft to be parked (except in an emergency).

17.9 No person in charge of an Aircraft shall fail to ensure that whilst that Aircraft is parked, it is chocked properly, or otherwise properly secured, so that it remains stationary.

17.10 No person, without Permission, shall fuel, service, de-ice or maintain an Aircraft, Vehicle or other equipment.

17.11 No person, without Permission, shall run or test an Aircraft engine.

17.12 No person, without Permission, shall cause or permit the obstruction of the passage of a Vehicle used for the purposes of refuelling an Aircraft.

17.13 No person, without Permission, shall cause or permit the obstruction of the passage of an Aircraft.

17.14 No person, to the extent it is applicable to that person, shall fail to comply with any requirement, procedure, restriction or regulation set out in the Aeronautical Information Publication or any NOTAM which relates to the Airport, or the operation of Aircraft in and around the Airport.

17.15 Where an incident occurs which involves damage to an Aircraft, or an Aircraft causing injury to another person or damage to other property, if present at the time of that incident the Pilot of that Aircraft (or, if the Aircraft is being towed, the tug-driver), and any other person involved in the incident, shall stop and give:

17.15.1 their name and address;

17.15.2 details of that incident; and

17.15.3 if that person is the Pilot:

17.15.3.1 the name and address of the person who was the Aircraft Operator at the time of the incident; and

17.15.3.2 the identification marks of the Aircraft;

to an Airport Official or a Constable, as soon as practicable after the incident.

17.16 No person shall leave an item in any Airside location which may damage, or interfere with the operation of, any Aircraft, Airport Infrastructure or Airport Equipment, other than in the ordinary course of its use and for a reasonable and proper purpose.

PART 18 LOST PROPERTY

18.1 Except as required by any other applicable law (including in respect of customs and excise), a person who finds, or otherwise comes into possession of, Lost Property shall as soon as practicable, either:

18.1.1 hand it to any person reasonably claiming to be the owner of that Lost Property, or inform that person where it is located;

18.1.2 hand it to an Airport Official or Lost Property Agent, and inform that Airport Official or Lost Property Agent of the state and circumstances in which that Lost Property was found or otherwise came into their possession; or

18.1.3 inform an Airport Official where it is located.

18.2 Where any Lost Property is, or is contained in, a package, bag or other receptacle, an Airport Official, Lost Property Agent or Constable may cause such receptacle to be opened and the contents examined for the purposes of:

18.2.1 identifying and tracing the owner of the Lost Property;

18.2.2 ascertaining the nature of the contents; or

18.2.3 any other reasonable purpose.

18.3 All Lost Property handed to an Airport Official or Lost Property Agent shall be retained in safe custody by LLA (or a Lost Property Agent acting on its behalf) for a period of at least two months from the date on which LLA (or a Lost Property Agent acting on its behalf) first came into possession of that Lost Property, except:

18.3.1 if collected by, or delivered to, the owner of that Lost Property at an earlier time in accordance with these byelaws;

18.3.2 for Lost Property that LLA (or a Lost Property Agent acting on its behalf) reasonably considers to be relevant to the commission or intended commission of a criminal offence (including a breach of these byelaws), which LLA (or a Lost Property Agent acting on its behalf) may hand over to the police or an appropriate government agency at any time;

18.3.3 for Lost Property that is in the form of an official document, including but not limited to a driving licence or passport, which LLA (or a Lost Property Agent acting on its behalf) may hand over to the police or to the appropriate government department, local authority or other body or person responsible for issuing it or for controlling or dealing with it at any time;

18.3.4 for Lost Property that:

18.3.4.1 is perishable;

18.3.4.2 is, or contains, a Hazardous Substance;

18.3.4.3 is of negligible value;

18.3.4.4 may reasonably be considered to have been deliberately and permanently abandoned; or

18.3.4.5 is of a size or quantity which cannot be safely or adequately stored in the Lost Property Office;

which LLA (or a Lost Property Agent acting on its behalf) may sell, donate to charity, or otherwise dispose of as LLA (or a Lost Property Agent acting on its behalf) may think fit at any time.

18.4 If a person:

18.4.1 satisfies LLA (or a Lost Property Agent acting on its behalf) that they are the owner of Lost Property held by LLA (or a Lost Property Agent acting on its behalf); and

18.4.2 pays such charges as LLA (or a Lost Property Agent acting on its behalf) specify in respect of the storing, handling, and administration of the Lost Property and its return to that person;

then LLA (or a Lost Property Agent acting on its behalf) shall make that Lost Property available for collection to that person at the Lost Property Office for a period of at least two months from the date on which LLA (or a Lost Property Agent acting on its behalf) first came into possession of that Lost Property, or deliver that Lost Property to that person, by such means and to such address as LLA (or a Lost Property Agent acting on its behalf) may otherwise agree with that person.

18.5 LLA (or a Lost Property Agent acting on its behalf) shall not be required to identify or to trace the owner of Lost Property, except if the name and address of the owner of that Lost Property is readily ascertainable on the face of that Lost Property, in which case LLA (or a Lost Property Agent acting on its behalf) shall attempt to contact the owner of that Lost Property to inform them that the Lost Property is being held by LLA (or a Lost Property Agent acting on its behalf) and may be collected (or delivered) in accordance with these byelaws.

18.6 LLA (or a Lost Property Agent acting on its behalf) shall keep for a period of not less than twelve months a record showing particulars of the Lost Property, the circumstances in which it was found and recording the ultimate return or disposal of the Lost Property.

18.7 LLA (or a Lost Property Agent acting on its behalf) will not be liable to the owner of Lost Property for any loss of, or damage to, that Lost Property, arising as a consequence of:

18.7.1 LLA (or a Lost Property Agent acting on its behalf) selling, donating, or otherwise disposing of that Lost Property in accordance with these byelaws;

18.7.2 LLA (or a Lost Property Agent acting on its behalf) handing over or delivering that Lost Property to another person claiming to be the lawful owner of that Lost Property, as long as LLA (or a Lost Property Agent acting on its behalf) acted in good faith and had reasonable grounds to believe that that other person was the lawful owner of that Lost Property;

18.7.3 that Lost Property being damaged in the course of another person delivering it to an address which the owner of the Lost Property has requested it be delivered to, or a failure by another person to deliver that Lost Property to that address;

18.7.4 that item of Lost Property perishing whilst being held by LLA (or a Lost Property Agent acting on its behalf); or

18.7.5 the movement or storage of that item of Lost Property, if that item of Lost Property requires specialist equipment or careful handling to avoid loss or damage to that Lost Property whilst it is being moved or stored.

18.8 Any unclaimed Lost Property held by LLA (or a Lost Property Agent acting on its behalf) for more than two months, from the date on which LLA (or a Lost Property Agent acting on its behalf) first came into possession of that Lost Property, may be sold, donated to charity, or otherwise disposed of as LLA (or a Lost Property Agent acting on its behalf) may think fit, and any proceeds of sale obtained will first be applied towards the payment of LLA's (or a Lost Property Agent acting on its behalf) charges for the storage, handling and administration of the item of Lost Property concerned and the costs of disposal, and any surplus (if any) will be retained or distributed by LLA (or a Lost Property Agent acting on its behalf) as it thinks fit.

PART 19 AIRPORT EXCLUSION

19.1 An Airport Official or Constable may make an oral or written request to a person, for that person to leave the Airport and not return for a period of 24 hours from the time of that request, if that Airport Official or Constable has reasonable grounds to believe that that person has committed or intends to commit a criminal offence (including a breach of these byelaws).

19.2 No person, without Permission, shall fail to immediately leave the Airport, and not return for a period of at least 24 hours, if requested to do so by an Airport Official or Constable in accordance with byelaw 19.1.

19.3 An Airport Manager or Constable may issue an Exclusion Notice to a person, in accordance with byelaw 19.4, directing that that person may not enter or remain at the Airport during such reasonable Exclusion Period as is determined by that Airport Manager or Constable, if that Airport Manager or Constable has reasonable grounds to believe that that person has committed or intends to commit a criminal offence (including a breach of these byelaws).

19.4 An Airport Manager or a Constable may issue an Exclusion Notice to a person by either handing that Exclusion Notice to that person or by posting or leaving it at the last known residential address of that person.

19.5 No person issued with an Exclusion Notice in accordance with byelaw 19.4, without Permission, shall:

19.5.1 if present at the Airport when issued with that Exclusion Notice, fail to immediately leave the Airport; or

19.5.2 enter the Airport at any time during the Exclusion Period set out in that Exclusion Notice.

PART 20 PENALTIES

20.1 Any person contravening any of the following byelaws shall be liable on summary conviction to a fine, which in respect of a contravention of:

20.1.1 byelaw 2.9, 2.10, 5.4, 8.1, 8.2, 8.3, 8.5, 8.6, 8.7, 8.9, 8.13, 8.14, 8.15, 8.16, 8.17, 8.18, 9.1, 9.4, 10.2, 10.4, 10.5, 17.1, or 18.1 shall not exceed level 2 on the standard scale;

20.1.2 byelaw 6.1, 6.2, 7.2, 8.8, 8.10, 8.19, 9.2, 9.3, 10.1, 10.3, 11.1, 11.2, 12.1, 14.1, 14.2, 14.6, 16.1, 16.2 or 16.3 shall not exceed level 3 on the standard scale; and

20.1.3 byelaw 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 2.11, 2.12, 2.13, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 4.1, 4.2, 4.3, 4.4, 4.5, 5.2, 5.3, 5.5, 5.6, 5.7, 6.3, 6.4, 7.1, 7.3, 7.4, 7.5, 8.4, 8.11, 8.12, 9.5, 12.2, 12.3, 12.4, 12.5, 12.6, 12.7, 12.8, 13.1, 14.3, 14.4, 14.5, 14.7, 17.2, 17.3, 17.4, 17.5, 17.6, 17.7, 17.8, 17.9, 17.10, 17.11, 17.12, 17.13, 17.14, 17.15, 17.16, 19.2 or 19.5, shall not exceed level 4 on the standard scale[1]

PART 21 REVOCATION OF EARLIER BYELAWS

21.1 The byelaws which were made by LLA under sections 63 and 64 of the Airports Act 1986 on 3 October 2005 and which were confirmed by the Secretary of State for Transport on 20 November 2005 are hereby revoked.

[1] As at the date of these byelaws the relevant levels of the standard scale are, by virtue of section 37(2) of the Criminal Justice Act 1982, as follows: Level 2 - £500, Level 3 - £1,000, Level 4 - £2,500. These levels are, however, subject to amendment from time to time by statute or by order made under section 143 of the Magistrates' Court Act 1980.

THE COMMON SEAL of **LONDON LUTON AIRPORT OPERATIONS LIMITED** was hereunto affixed this 26th day of August 2025 in the presence of:

Alberto Martin
Director

Mee-Ling Sheffington
Company Secretary

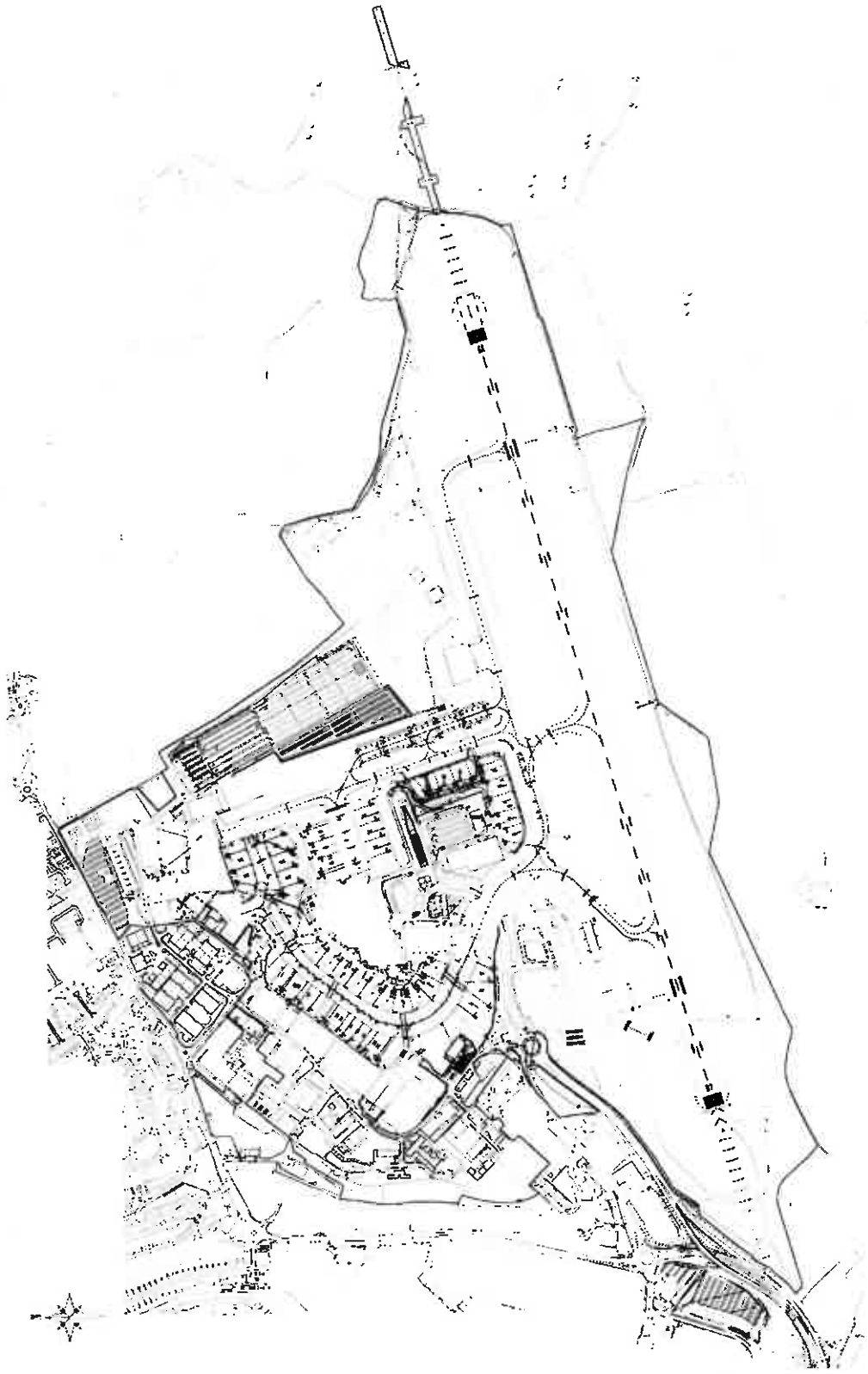
The foregoing byelaws are hereby confirmed by the Secretary of State for Transport and shall come into operation on 30th July 2025.

SIGNED BY

.....
Michael Stark
Deputy Director,
Aviation - Commercial, Strategy and Sponsorship
by authority of the Secretary of State for Transport

30th July 2025

Schedule 1 - Map



CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

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.

Official copy of register of title

Title number BD230068 | Edition date 04.11.2024

- This official copy shows the entries on the register of title on 14 MAR 2025 at 17:38:08.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 02 Jun 2026.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Peterborough Office.

A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

LUTON

1 (23.10.1992) The Leasehold land shown edged with red on the plan of the above Title filed at the Registry and being Hangar 60, Percival Way, London Luton Airport, Luton.

2 (23.10.1992) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:
Date : 6 October 1992
Term : 100 years from 24 April 1992
Rent : As therein mentioned
Parties : (1) London Luton Airport Limited
(2) Monarch Aircraft Engineering Limited
NOTE: Copy filed under BD173594.

3 (23.10.1992) There are excepted from the effect of registration all estates, rights, interests, powers and remedies arising upon, or by reason of, any dealing made in breach of the prohibition or restriction against dealings therewith inter vivos contained in the Lease.

4 Unless otherwise mentioned the title includes any legal easements granted by the registered lease(s) but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (03.04.2024) PROPRIETOR: LONDON LUTON AIRPORT OPERATIONS LIMITED (Co. Regn. No. 03491213) of Percival House, 134 Percival Way, London Luton Airport, Luton LU2 9NU.

B: Proprietorship Register continued

2 (03.04.2024) The price stated to have been paid on 29 February 2024 was £1,025,000 exclusive of VAT.

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

There is an/are application(s) pending in HM Land Registry and if we have only completed the mapping work for a pending application affecting the title concerned, such as a transfer of part:

- additional colour or other references, for example 'numbered 1', may appear on the title plan (or be referred to in the certificate of inspection in form CI), but may not yet be mentioned in the register
- colour or other references may also have been amended or removed from the title plan (or not be referred to in form CI), but this may not be reflected in the register at this stage.

This official copy is issued on 04 June 2026 shows the state of this title plan on 14 March 2025 at 17:38:08. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. This title is dealt with by the HM Land Registry, Peterborough Office .

HM Land Registry
Official copy of title plan

Title number **BD230068**
Ordnance Survey map reference **TL1121NE**
Scale **1:1250**
Administrative area **Luton**

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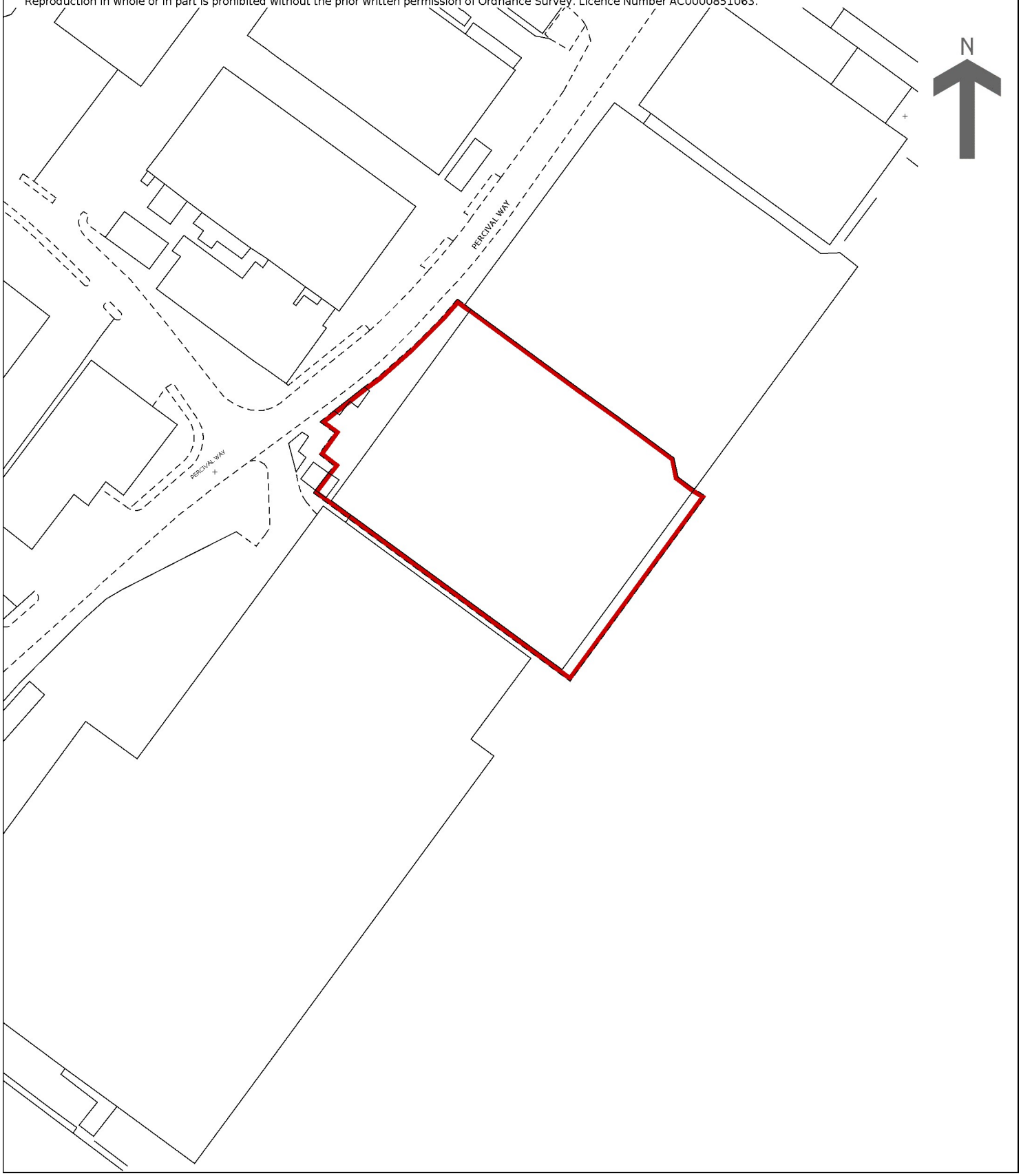


This official copy is incomplete without the preceding notes page.

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

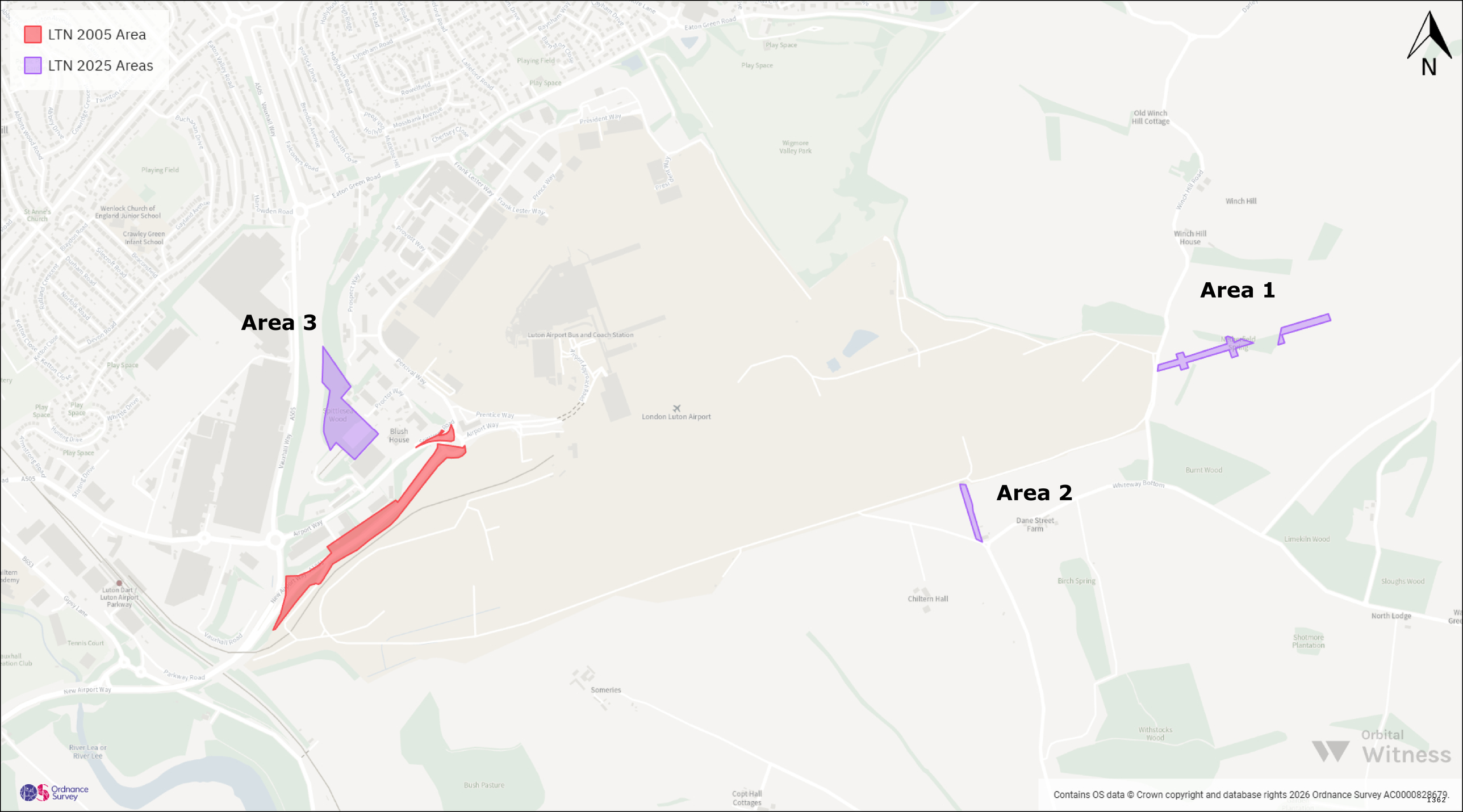
PERSONS UNKNOWN

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.


LTN 2005 Area
LTN 2025 Areas
N
Area 1
Area 2
Area 3
Luton Airport Bus and Coach Station
London Luton Airport
Blush House
Spittlesea Wood
Wigmore Valley Park
Old Winch Hill Cottage
Winch Hill
Winch Hill House
Burnt Wood
Dane Street Farm
Limekiln Wood
Birch Spring
Chiltern Hall
Sloughs Wood
North Lodge
Shotmore Plantation
Withstocks Wood
Someries
Bush Pasture
Copt Hall Cottages
Luton Dart / Luton Airport Parkway
Tennis Court
River Lea or River Lee
Wenlock Church of England Junior School
Crawley Green Infant School
Playing Field
Play Space
Eaton Green Road
Airport Way
Vauxhall Road
Parkway Road
New Airport Way
Whiteway Bottom
Orbital Witness
Ordnance Survey
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CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW11

This is the exhibit marked "AJW11" in the witness statement of Alexander James Wright.

Official copy of register of title

Title number HD544934 | Edition date 10.07.2015

- This official copy shows the entries on the register of title on 03 JUN 2026 at 15:06:05.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 03 Jun 2026.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Leicester Office.

A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

HERTFORDSHIRE : NORTH HERTFORDSHIRE

1 (10.07.2015) The Leasehold land demised by the lease referred to below which lies within the area shown edged with red on the plan of the above Title filed at the Registry and being Landing lights lying to the east of Airport Way, London Luton Airport, Luton.

2 (10.07.2015) The land edged yellow on the title plan has the benefit of but is subject to all rights of way public or private or of water drainage light and other easements and rights of adjoining owners.

3 (10.07.2015) The land edged brown on the title plan land has the benefit of the rights reserved by but is subject to the rights granted by a Deed of Gift dated 26 October 1990 made between (1) The Honourable Richard Oakley Pleydell-Bouverie and (2) Gillian Margaret Victoria Pleydell-Bouverie.

NOTE:-No copy of the deed is held by Land Registry. But see the entry in the Charges Register referring to this deed.

4 (10.07.2015) The land has the benefit of the rights reserved by but is subject to the rights granted by a Deed of Grant dated 21 January 1991 made between (1) Robert William Smith and Mark Iain Tennant (Grantors) and (2) Fina plc.

NOTE: Copy filed under HD511283.

5 (10.07.2015) The land has the benefit of and is subject to the rights contained in a Transfer of the freehold estate in the land edged and numbered 1 & 2 in blue on the title plan and other land dated 5 April 2005 made between (1) Mark Iain Tennant and Andrew Leslie Pym and (2) Harriot Isobel Pleydell-Bouverie and Bartholemew Richard Pleydell-Bouverie.

NOTE:-Copy filed under HD442451.

6 (10.07.2015) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:
Date : 6 July 2015

A: Property Register continued

Term : 21 years beginning on and including 7 February 2014 and ending on and including 6 February 2035
Parties : (1) Gillian Margaret Victoria Pleydell-Bouverie
(2) Bartholomew Richard Pleydell-Bouverie and Harriot Isobel Pleydell-Bouverie
(3) Richard Oakley Pleydell-Bouverie
(4) London Luton Airport Operations Limited

7 (10.07.2015) The Lease prohibits or restricts alienation.

8 (10.07.2015) The land has the benefit of any legal easements granted by clause LR11.1 of the registered lease dated 6 July 2015 referred to above.

9 (10.07.2015) The landlord's title is registered.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (10.07.2015) PROPRIETOR: LONDON LUTON AIRPORT OPERATIONS LIMITED (Co. Regn. No. 3491213) of Navigation House, Airport Way, London Luton Airport, Luton LU2 9LY.

C: Charges Register

This register contains any charges and other matters that affect the land.

1 (10.07.2015) The land edged yellow on the title plan is subject to the following rights reserved by a Deed of Gift of the freehold estate in the land edged yellow on the title plan and other land dated 26 October 1990 made between (1) The Honourable Richard Oakley Pleydell-Bouverie and (2) Gillian Margaret Victoria Pleydell-Bouverie:-

EXCEPTING AND RESERVING the right set out in the Second Schedule hereto

THE SECOND SCHEDULE

(Rights excepted or reserved)

1. A right of way in fee simple to the Donor and his successors in title the owners and occupiers for the time being of all or any part of OS 0025 shown edged blue on the Plan annexed hereto and his servants and licensees going to or from OS 0025 or any part thereof full right and liberty from time to time and at all times hereafter and for all purposes to pass and repass with or without animals and vehicles across through and over OS 7218 and every part thereof.

NOTE: Copy plan filed under HD511407.

End of register

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HM Land Registry
Official copy of title plan

Title number **HD544934**
Ordnance Survey map reference **TL1321SE**
Scale **1:2500**
Administrative area **Hertfordshire : North Hertfordshire**

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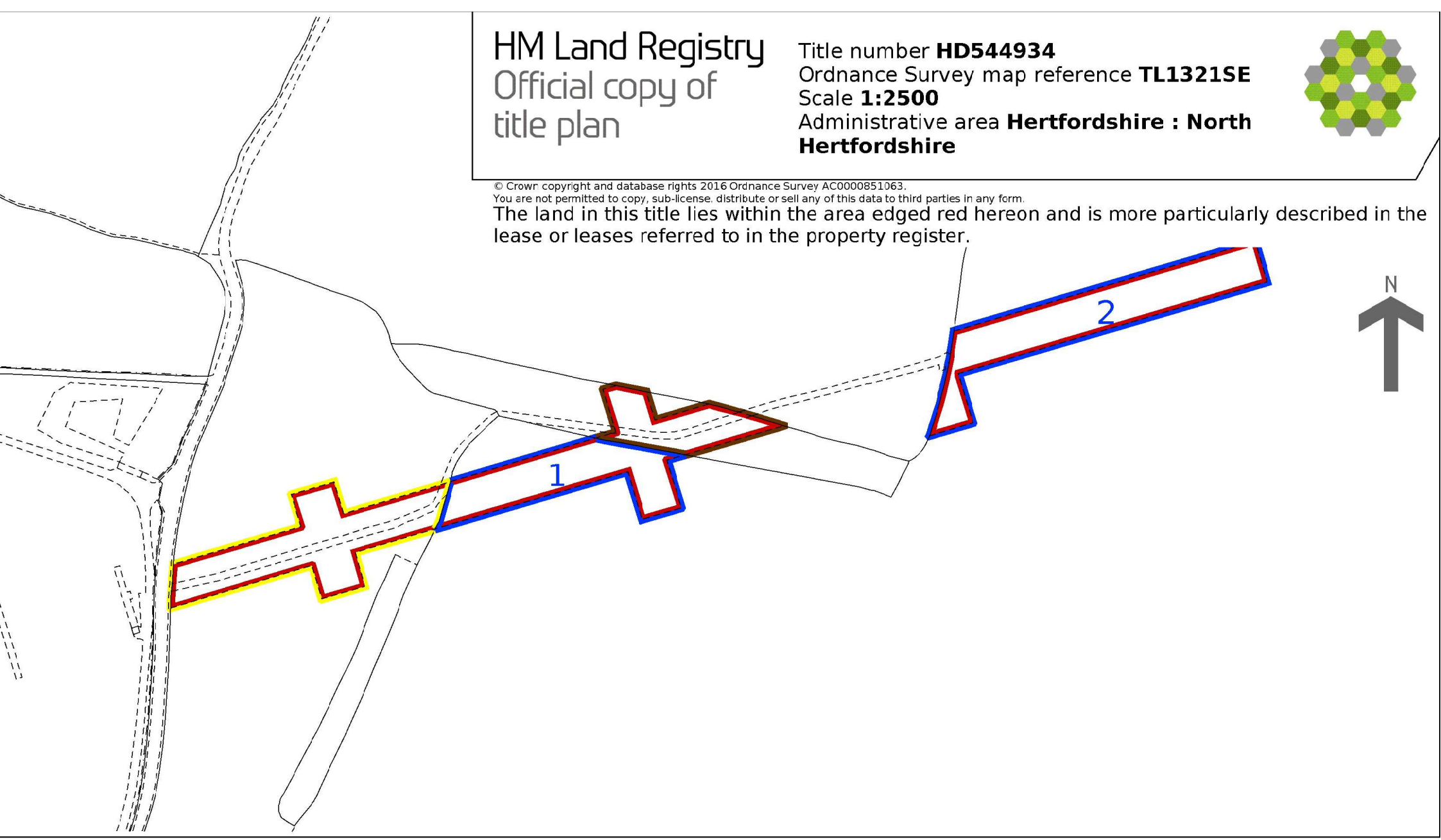
The land in this title lies within the area edged red hereon and is more particularly described in the lease or leases referred to in the property register.



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This official copy is incomplete without the preceding notes page.

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW12

This is the exhibit marked "AJW12" in the witness statement of Alexander James Wright.

Official copy of register of title

Title number BD146644 | Edition date 16.11.2017

- This official copy shows the entries on the register of title on 21 JUL 2025 at 21:47:18.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 03 Jun 2026.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Peterborough Office.

A: Property Register

This register describes the land and estate comprised in the title.

LUTON

1 (10.05.1989) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being land on the North East side of Spittlesea Road, Luton.

2 The land has the benefit of the rights granted by but is subject to the rights reserved by the Transfer dated 12 April 1989 referred to in the Charges Register.

3 The Transfer dated 12 April 1989 referred to above contains a provision as to boundary structures.

4 (12.09.1995) A Deed dated 31 July 1995 made between (1) London Luton Airport Limited and (2) St Modwen Developments Limited is expressed to grant rights as therein mentioned.

NOTE: Copy filed.

5 (20.02.1998) The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.

6 (20.02.1998) The land has the benefit of the following rights reserved by the Transfer dated 2 February 1998 referred to in the Charges Register:-

"subject to the exceptions and reservations set out in Schedule 3

Schedule 3

(Exceptions & Reservations)

Except and reserving in favour of the Retained Land and every part thereof for the benefit of the Seller and its successors in title and the persons deriving title under them and their servants agents licensees and invitees:-

1. the free and uninterrupted passage of water steam oil air gas electricity telephone communications and other services from and to any part of the Property through the drainage facility shown approximately on Plan 2 and any other Conducting Media commonly used for those

A: Property Register continued

purposes which may in the future but during the period of eighty years after the date hereof be in upon or under the Property and serving the Retained Land or any part thereof

2. the right on giving reasonable prior notice (except in emergency) to enter upon the Property in order to lay inspect maintain repair renew alter and construct in on over or under the external areas of the Property (but not the buildings constructed on the Property and avoiding so far as reasonably possible the service yard on the Property) new Conducting Media for the benefit of the Retained Land independent of any such Conducting Media serving the Property Provided That:

(A) the routes of any new Conducting Media shall be first approved by the owner for the time being of the Property (such approval not to be unreasonably withheld or delayed)

(B) all such works shall be carried out as quickly as reasonably possible and without causing unnecessary interference disruption or disturbance to the owners and occupiers of the Property

(C) all such works shall be carried out in a good and workmanlike manner and in accordance with all necessary consents and any other reasonable requirements of the owners and occupiers of the Property

(D) any damage caused by the said works to the Property is to be made good as soon as reasonably possible

(E) as regards the Option Land referred to in an Agreement ("Option Agreement") dated 15th December 1993 and made between (1) The Council of the Borough of Luton and (2) Allied Investment and Property Holdings Limited the rights in Paragraphs 1 and 2 of this Schedule shall cease to exist upon any transfer of the Option Land pursuant to the Option Agreement and shall be replaced by rights equivalent to those set out in clause 12(ii)(c) of the Option Agreement and the parties undertake that they or their successors in title will enter into such documentation as may be required to give effect to such variation in the rights hereby granted

3. the full and free right to repair rebuild alter demolish develop and alter and to carry out any other works upon or to the Retained Land and any buildings from time to time thereon in such manner as the Seller or its successors in title thinks fit notwithstanding any interference with the light or air to or in respect of the Property."

NOTE: Copy plan 2 filed.

7 (28.02.2000) The land has the benefit of the rights reserved by a Transfer dated 1 December 1999 referred to in the charges register.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (24.12.2013) PROPRIETOR: LONDON LUTON AIRPORT OPERATIONS LIMITED (Co. Regn. No. 3491213) of Navigation House, Airport Way, London Luton Airport, Luton LU2 9LY.

2 (28.02.2000) RESTRICTION: Except under an order of the registrar no transfer or grant of a lease for more than 25 years is to be registered unless a certificate by a solicitor is lodged that the provisions of clause 18.9.1 of the Transfer dated 1 December 1999 referred to in the Charges Register have been complied with.

3 (09.11.2001) A Transfer of the land in this title dated 19 October 2001 made between (1) St Modwen Ventures Limited and (2) TBI plc contains vendors personal covenant(s) details of which are set out in the schedule of personal covenants hereto.

B: Proprietorship Register continued

4 (24.12.2013) The price stated to have been paid on 22 November 2013 was £1,400,000 plus £280,000 VAT.

5 (24.12.2013) The Transfer to the proprietor contains a covenant to observe and perform the covenants referred to in the Charges Register and of indemnity in respect thereof.

6 (16.11.2017) RESTRICTION: No disposition of the registered estate by the proprietor of the registered estate is to be registered without a written consent signed by the proprietor for the time being of the Charge dated 16 August 2017 in favour of The Royal Bank of Scotland plc referred to in the Charges Register.

Schedule of personal covenants

1 The following are details of the personal covenants contained in the Transfer dated 19 October 2001 referred to in the Proprietorship Register:-

"The Transferor covenants with the Transferee and its successors in title to each and every part of the Property that the Transfor will keep the Transferee and its successors in title indemnified against all costs claims and liabilities arising out of any outstanding obligations on the part of "the Developer" contained or referred to in an Agreement dated 18 June 1996 made between (1) The Council of the Borough of Luton (2) St Modwen Developments Limited (3) Midland Bank Plc and (4) Allied Investment and Property Holdings Limited, as varied by an Agreement dated 3 June 1997 and made between the same parties."

C: Charges Register

This register contains any charges and other matters that affect the land.

1 A Transfer of the land in this title dated 12 April 1989 made between (1) Vauxhall Motors Limited and (2) Allied Investment and Property Holdings Limited contains restrictive covenants.

NOTE: Original filed.

2 (20.02.1998) The land is subject to the following rights granted by a Transfer of the land edged and numbered BD180840 in green on the filed plan dated 2 February 1998 made between (1) St. Modwen Developments Limited (Seller) and (2) Midland Bank Trust Company Limited (Buyer):-

"together with the rights set out in Schedule 2

Schedule 2

(Rights Granted)

In favour of the Property and every part thereof for the benefit of the Buyer and its successors in title and the persons deriving title under them and their servants agents licensees and invitees (but subject to the Buyer and its successors in title indemnifying the Seller and its successors in title and the occupiers for the time being of the Retained Land from and against all costs claims losses proceedings demands and expenses arising out of the exercise of such rights) the right upon giving reasonable prior written notice (except in the case of emergency) to the Seller or its successors in title and the occupiers for the time being of the Retained Land to enter only so far as necessay upon the Retained Land for the purpose od inspecting and executing repairs and other works to or on the Property so far as the same cannot otherwise reasonably be carried out the persons so entering causing as little damage disturbance or inconvenience as reasonably possible to the Retained Land the Seller and its successors and the said occupiers or the business being carried on upon the Retained Land and making good as soon as practicable all damage to the Retained Land by the exercise of this right Provided That the persons exercising such rights shall not carry out or permit to be carried out any works or other activity or activities which would or might damage the impermeable membrane installed by the Seller within the Retained Land"

C: Charges Register continued

3 (28.02.2000) A Transfer of the land edged and numbered BD213759 in green on the filed plan dated 1 December 1999 made between (1) St Modwen Ventures Limited and (2) Vauxhall Motors Limited contains restrictive covenants by the Transferor.

NOTE:- Copy in Certificate.

4 (16.11.2017) REGISTERED CHARGE contained in a Security Agreement dated 16 August 2017 affecting also other titles.

NOTE: Charge reference BD146644.

5 (16.11.2017) Proprietor: THE ROYAL BANK OF SCOTLAND PLC (Scot. Co. Regn. No. 090312) of Level 9, 250 Bishopsgate, London EC2M 4AA.

6 (16.11.2017) The proprietor of the Charge dated 16 August 2017 referred to above is under an obligation to make further advances. These advances will have priority to the extent afforded by section 49(3) Land Registration Act 2002.

End of register

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- colour or other references may also have been amended or removed from the title plan (or not be referred to in form CI), but this may not be reflected in the register at this stage.

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H.M. LAND REGISTRY

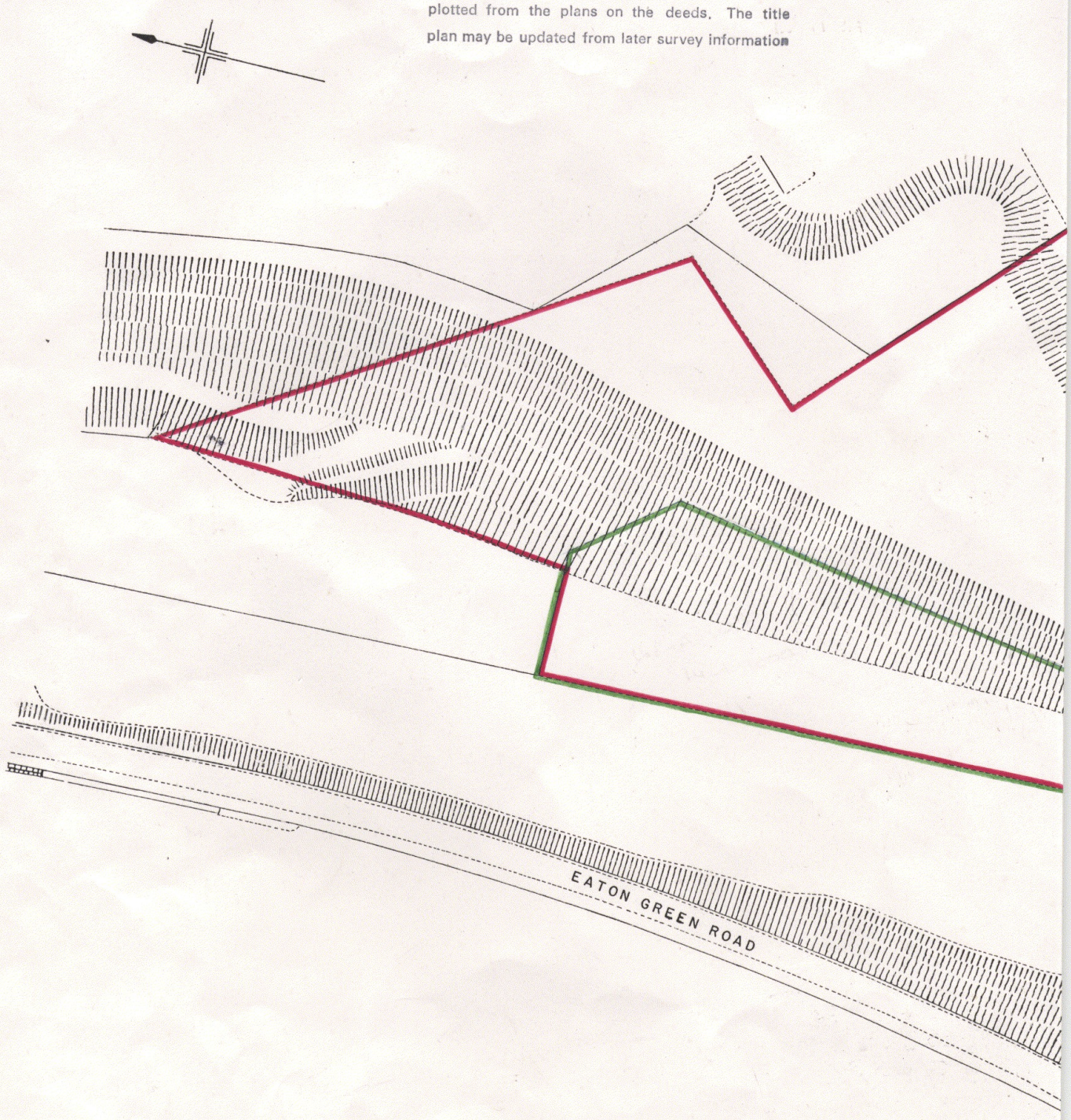
TITLE NUMBER

BD 146644

ORDNANCE SURVEY PLAN REFERENCE	TL 1120 NW TL 1121 SW	Scale 1/1250
COUNTY BEDFORDSHIRE	~~DISTRICT LUTON~~	© Crown copyright

ADMINISTRATIVE AREA LUTON

The boundaries shown by dotted lines have been plotted from the plans on the deeds. The title plan may be updated from later survey information



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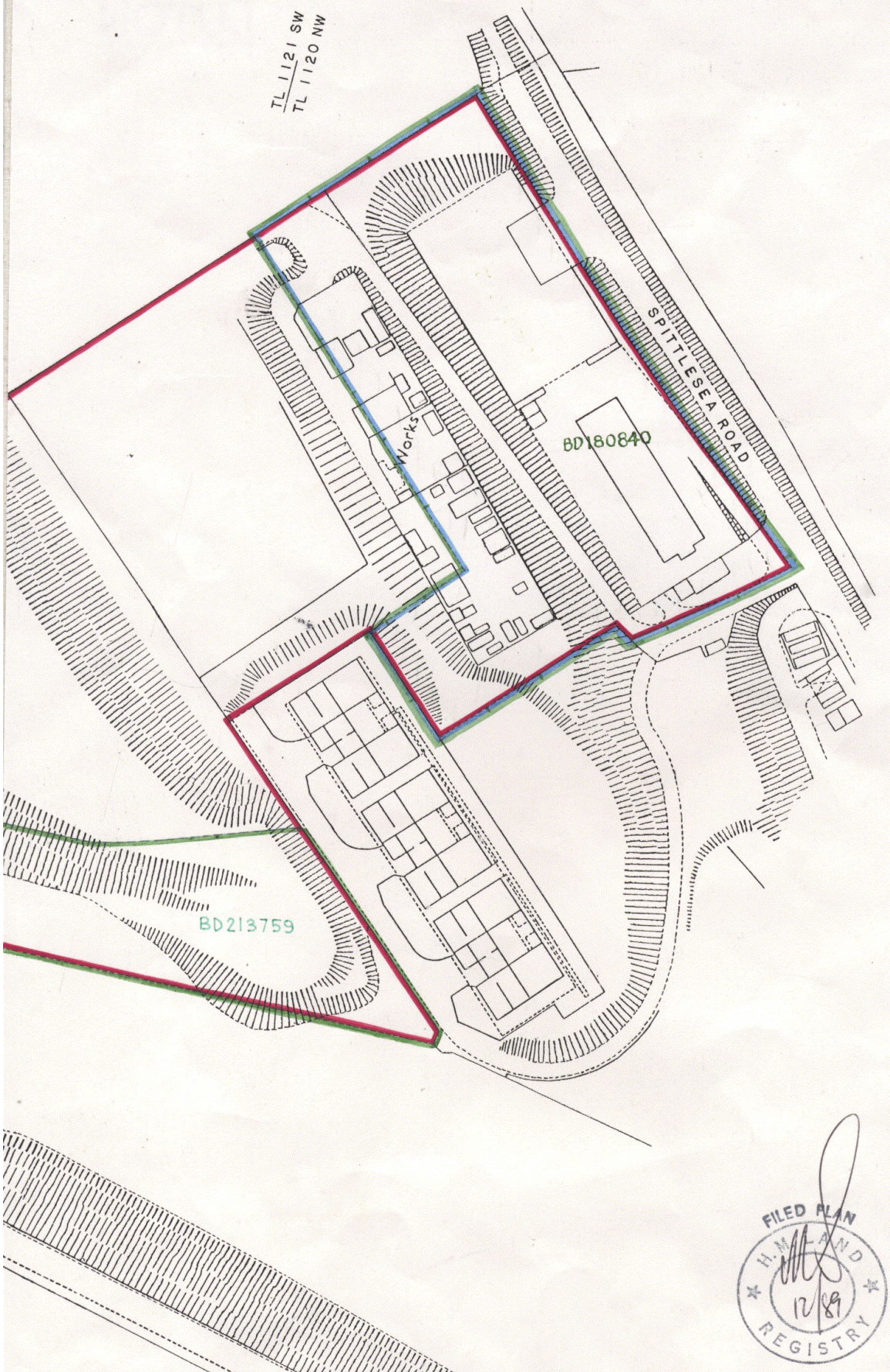

FILED PLAN
H.M. LAND
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REGISTRY

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CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

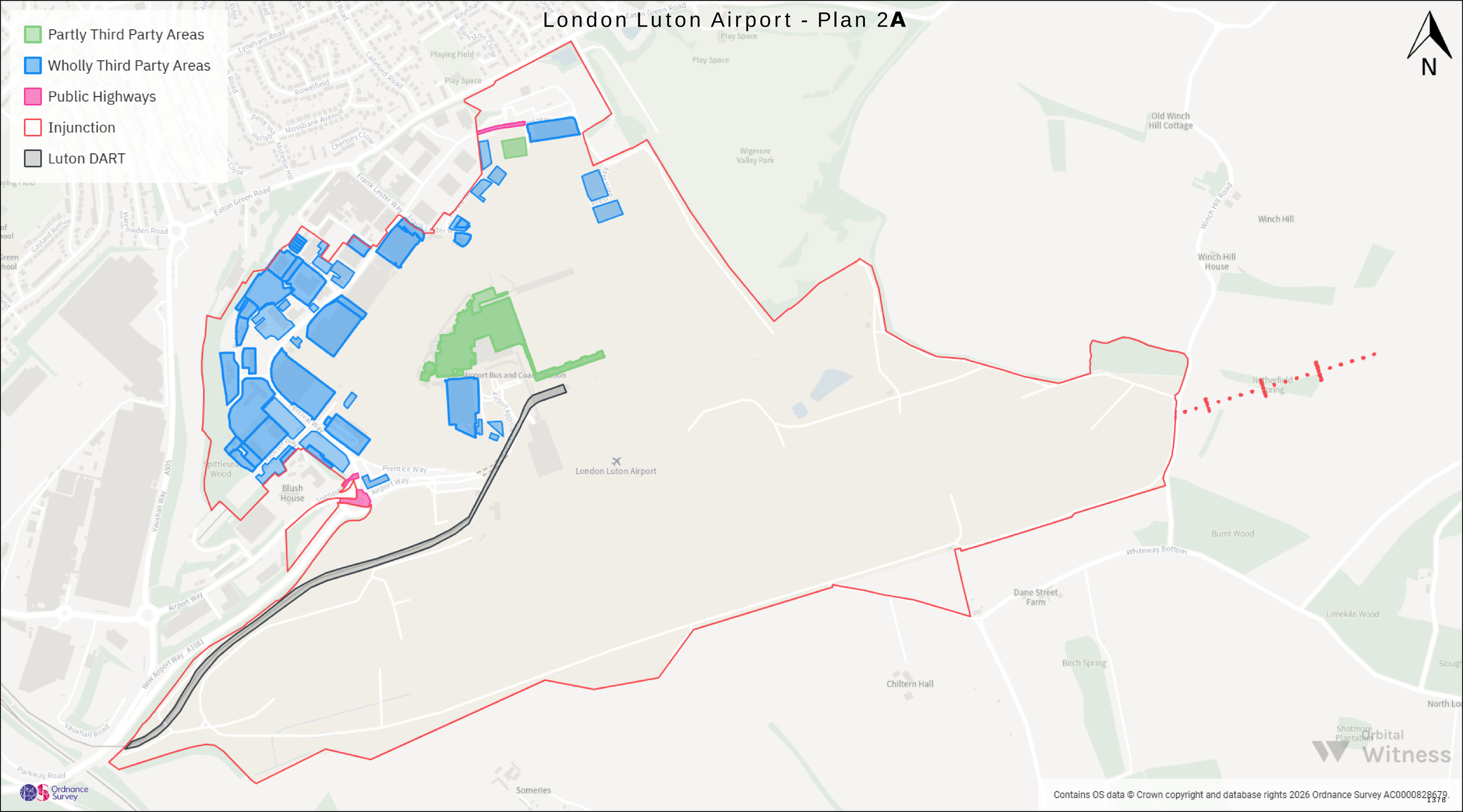
AJW13

This is the exhibit marked "AJW13" in the witness statement of Alexander James Wright.

London Luton Airport - Plan 2



London Luton Airport - Plan 2A



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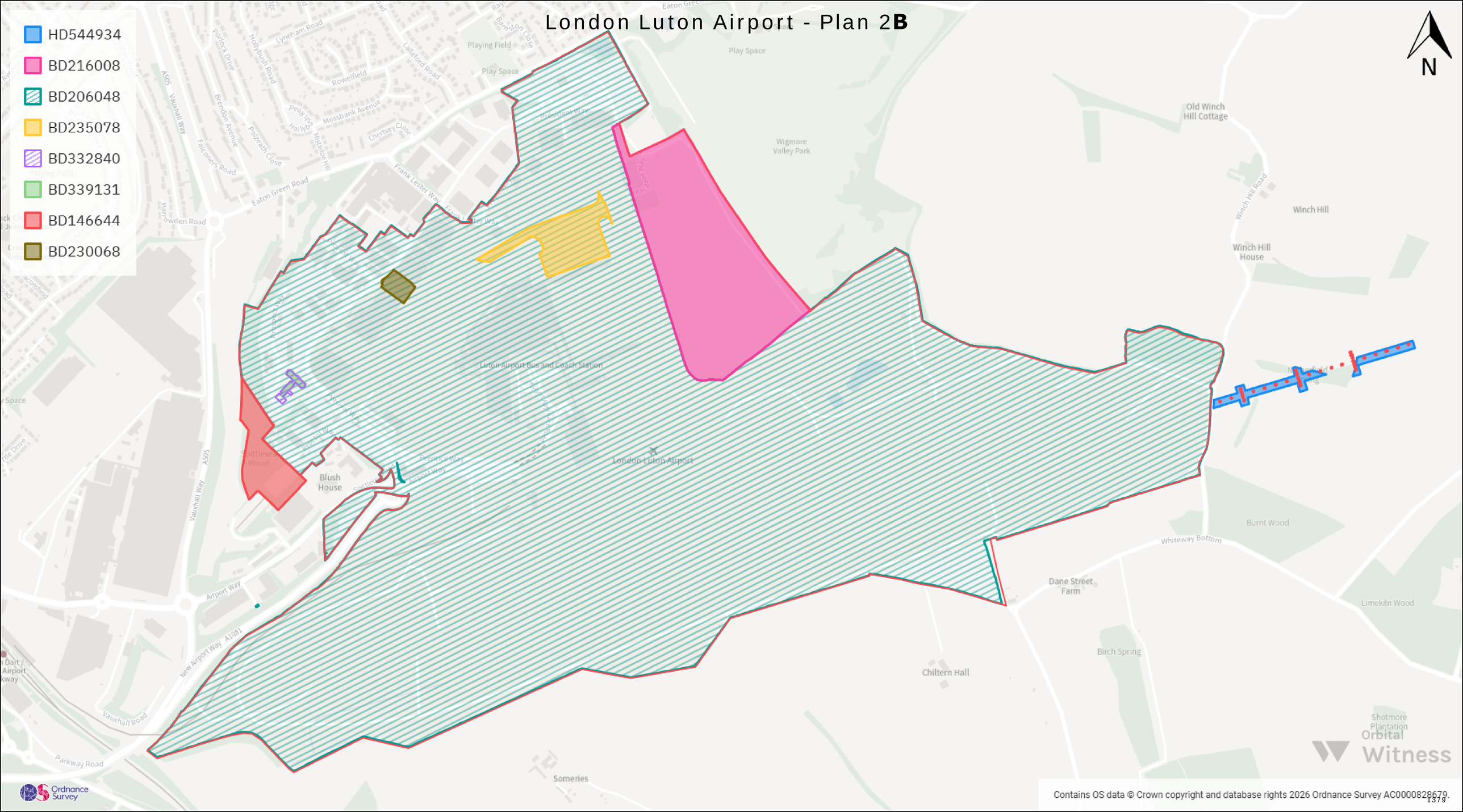
London Luton Airport - Plan 2**B**



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CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW14

This is the exhibit marked "AJW14" 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)		

■

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Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW15

This is the exhibit marked "AJW15" in the witness statement of Alexander James Wright.

Incidents from July 2025

Date of Event/press	Location	Brief details of event etc.	Link to source of informations
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.whtimes.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/dGFnOnJldXRlcnMuY29tLDIwMjY6bmV3c21sX01UMVNJUEEwMDBPRjlXU1k
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."



Extinction Rebellion outside Aviva, Pear Street, Sheffield.

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 it's 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

Media enquiries:
insureoursurvival@gmail.com
XR UK press team: press@extinctionrebellion.uk, 07756136396

For immediate release

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

Over the past 12 months, IOS has coordinated more than 150 actions, targeting 27 insurance firms in over 40 towns and cities. Now, the momentum is accelerating. From 2–14 July, a UK-wide Wave of Action will ramp up pressure on the insurers enabling climate destruction. Across the country, activists will expose the "dirty insurers" underwriting and brokering some of the world's most devastating fossil fuel projects—including the East African Crude Oil Pipeline (EACOP), Mozambique LNG, Arctic LNG 2, and Papua LNG.

Fossil fuel companies cannot operate without insurance. That makes insurers the hidden enablers of climate breakdown—profiting from disaster while claiming neutrality. But they're no longer in the shadows. They are a critical weak link in the fossil fuel chain—and campaigners are stepping up to break it.

GLOBAL PROJECTS, LOCAL CONSEQUENCES

EACOP is already displacing thousands in Uganda and Tanzania, violating human rights, threatening food and water supplies, and endangering protected ecosystems. LNG projects in Papua New Guinea, Mozambique, and the Russian Arctic are linked to militarisation, the destruction of Indigenous lands, and irreversible ecological damage [1, 2, 3, 4]. These are just a few of the 400+ carbon bombs currently in development [5].

But the impacts aren't confined to distant places.

"By backing these fossil fuel projects, insurers are not only fuelling climate breakdown and human rights abuses—they're also making life harder here in the UK," said Lucy Porter, a spokesperson for Insure Our Survival.

"When extreme weather floods our homes, when food prices surge, and when small businesses can no longer afford insurance, we must ask: who is enabling this chaos? Insurers who continue to underwrite new oil, gas, and coal projects are complicit—not just in destruction abroad, but in rising suffering at home."

LOCAL ACTION, GLOBAL RESISTANCE

Throughout the Wave of Action, communities across the UK will organise creative and disruptive protests outside the offices of targeted insurers and brokers. From city centres to rural high streets, IOS is calling on people to make visible the connection between fossil fuel insurance and the cost of climate chaos.



“Insurance giants like Lloyd’s, Liberty Mutual, AIG, Tokio Marine, Brit, Chaucer, and brokers like Marsh have the power to stop destructive fossil fuel projects like EACOP—but instead, they choose to back industries driving climate collapse, human rights abuses, hunger, war, and displacement.

Right now, 11 climate activists in Uganda have been brutally detained for speaking out against EACOP’s new funders. While insurers protect the profits of the richest 1%, communities around the world are paying the price—facing deadly heatwaves, floods, droughts, and devastation.

How long must we raise the alarm before they act? It’s time they chose people over profit, justice over destruction, and life over collapse. We can’t escape to Mars. This is our only home—and we will not stop fighting for it.”
— *Nicholas Omonuk, End Fossil Occupy Uganda*

WHAT’S NEXT: A GLOBAL ESCALATION

Following the UK Wave of Action, IOS will launch its international phase—escalating and expanding efforts worldwide. The campaign will work with global activists to confront dirty insurers and brokers in every region, turning scattered actions into a united front against the industry’s role in climate injustice.

“We don’t have 20 years to stop these projects. We barely have time to avoid irreversible collapse,” said Porter. “That’s why we’re escalating now—together, across borders, communities, and every dirty insurer’s threshold.”

📣 TAKE ACTION

- **Join the IOS Telegram** for updates, action support, and resources: https://t.me/+wV2EEWPpMJtlMzQ0
- **Visit the IOS website** and sign up to get involved: InsureOurSurvival.org
- **Socials**
  Instagram: https://xrb.link/GA8tN8nk5
  Bluesky: https://xrb.link/jz6Y7618
- **Media enquiries:** insureoursurvival@gmail.com

References

[1] ‘Monstrous’ east African oil project will emit vast amounts of carbon, data shows

[2] Death, violence and endless delay: Inside Africa’s most troubled energy project

[3] Explainer: Russia’s ambitions and challenges in Arctic

[4] More banks rule out support for TotalEnergies’ Papua LNG project

[5] Carbon bombs under the spotlight

London Oxford Airport: Extinction Rebellion to hold protest

Oxford Airport

Environmentalists at Extinction Rebellion will be protesting at London Oxford Airport near Kidlington against private jets.

The group claim it is the “most energy-intense form of flying” at the airport formerly known as Kidlington Airport, claiming each jet will emit “substantially more carbon per passenger than commercial flights”.

Taking place on Saturday, July 5, protesters will assemble at 10am for a march from the west end of Kidlington High Street to the entrance of the airport.

They say the demonstration will be peaceful.

It comes after protesters from Palestine Action were widely condemned by national politicians after breaking into RAF Brize Norton overnight on Thursday, June 19 and sprayed red paint into the engines of two Airbus Voyager aircrafts and onto the runway.

This prompted Prime Minister Sir Keir Starmer to condemn the actions of the protesters as "disgraceful".

He added: "Our Armed Forces represent the very best of Britain and put their lives on the line for us every day. It is our responsibility to support those who defend us."

Now another stunt is planned in the county by the Extinction Rebellion group.

A file image of Extinction Rebellion protesters. Image: PA Freya Chambers, an activist with Extinction Rebellion Oxford, said: “As global temperatures continue to rise, now is the time to drastically cut emissions – starting with luxury private flights.

“Instead, the UK is now being hailed as the private jet capital of Europe.

“Oxford Airport is a hub for private flights by the wealthy elite, while the local community pays the price in pollution and an accelerating climate crisis.”

She added: “According to Civil Aviation Authority data, 13,774 private flights went to or from Oxford Airport in 2024.

“This is an average of 38 private jets every single day. At least 28 per cent of those were empty of passengers.

“These private jets are used like taxis by the super-rich to make short, one-way journeys within the UK and Europe.

“Globally, almost half of all private flights in 2023 were shorter than 500 km - that’s about the same as London to Edinburgh - and Oxford follows this trend.”

A general view of London Oxford Airport. Picture: Richard Cave She said the group is calling for an end to private jet travel, and that the increase in air passenger duty for domestic private jet travel introduced by the government “is not enough”.

“We need decisive action to decarbonise aviation, starting with stopping unnecessary private flights that only benefit the wealthy one per cent,” she added.

Thames Valley Police and Oxford Airport have both been contacted for further comment on the planned protest.

■

Extinction Rebellion protest outside insurance brokers



Members of XR North Lakes are out on the streets of Penrith today, protesting outside the offices of insurance broker Marsh.

The placard-waving protestors are taking part in a national day of action against insurance businesses which they say are "enabling" the fossil fuel industry by insuring high profile global projects.

Protests also took place at the offices of Marsh Commercial in Carlisle and Kendal.

Allan Todd, former teacher and climate activist, of Keswick, said: "Marsh is one of a number of insurance brokers which continue to facilitate fossil-fuel projects that drive the climate and ecological crises.

"Our action today is also part of the wider Road to Belem campaign, run by the Climate Justice Coalition in the run-up to COP30. We need to act now to avert the worst impacts of climate change and make the planet as habitable as possible for future generations."

This national week of action will be followed by an international wave of action in September, in solidarity with activists on the front line of the new oil and gas projects.
■

extinction rebellion
SCOTLAND

EXTINCTION REBELLION SCOTLAND AND SCIENTIST REBELLION DENMARK PROTEST PRIVATE JETS COMPANY, BLACKBIRD

February 16, 2025

Extinction Rebellion Scotland and Scientist Rebellion Denmark protested at Inverness Airport in Scotland and Billund Airport in Denmark. They were highlighting the contradictions between Blackbird Air's CEO Anders Povlsen private jets enterprise and his Wildland commitment to nature.



Credit: Siobhan Chalmers @_schal

Protesters waved banners outside Inverness Airport in Scotland declaring 'Ban Private Jets' and 'Blackbird Nae mAir' accompanied by others dressed as "blackbirds". A huge banner was laid on the ground with words from the Wildland Ltd. company website "We're in a climate emergency. We need to step up and take action".

Watch Chris Packham's message to the protest.

The protestors were calling for Anders Povlsen "to step up and take action", close down Blackbird Air and invest in clean transportation.

The protests were connected by an innovative two-way live link displayed on monitors at both Inverness Airport and at the Blackbird HQ in Billund Airport Denmark.

XR Scotland and SR Denmark call into account the contradictory behaviours of a so-called "eco-billionaire". One of the largest landowners in Scotland, Povlsen owns Blackbird Air, a luxury private jet business which is set to expand. At the same time Povlsen operates Wildland, a private enterprise which acknowledges the urgent need to act on the climate emergency.



Credit: Siobhan Chalmers @_schal

The use of private jets has soared in recent years, with the resulting climate-heating emissions rising by 50%. Passengers in larger private jets caused more CO2 emissions in an hour than the average person did in a year. Aviation fuel remains untaxed while those using a car to get to work pay their taxes at the pumps.

The aviation industry is promoting Sustainable Aviation Fuel (SAF) but the UK SAF mandate only requires that 2% of the UK's total jet fuel demand be met by SAF in 2025, increasing to 10% in 2030. SAF is always blended with fossil fuels as around 65% of so-called sustainable fuel is kerosene.

However, some airlines and countries are changing. The Danish company, Lego, is closing its private jet division this year. Amsterdam's Schiphol airport announced a ban on private jets in April 2023. Belgium has introduced new taxes on private jets and France is expected to follow.

Dr Sarah Birkby from Extinction Rebellion Highlands and Islands and Moray said:
'It is completely contradictory to state the importance of acting on the climate emergency and at the same time run a private jet company. The time when people, no matter how rich, could say one thing and do the exact opposite is over. As Wildland Ltd itself declares, we need people to step up and take action".

Dr Anthony Graham from Scientists for Extinction Rebellion stated:
"The evidence is clear: our current emissions pathway is incompatible with a safe planet. Every tonne of CO_2 fuels climate change, yet private jets – used by the wealthiest 0.003% – emit disproportionate amounts, worsening both the climate crisis and inequality. Scientists for Extinction Rebellion urge action on luxury emissions, stressing that those with the most power must lead by example."

Finlay Asher, a spokesperson for Safe Landing, a global community of aviation workers, said:
"At Safe Landing, our aviation community are firmly of the position that there needs to be a rapid reduction in private jets in favour of cleaner and greener forms of travel. And as a Scottish aerospace engineer, I'd love to see Scotland lead the way and pioneer the genuinely sustainable future of flight. Rather than catering to carbon-intensive flying for an elite minority, Inverness Airport could instead become our green gateway for essential island air travel."

Alex Cochrane from Extinction Rebellion Scotland said:
"Private jets are the quickest way to burn fossil fuels and produce on average 10 times more CO_2 emissions per passenger than commercial flights. Though Blackbird Air states on their website 'Our private jets feature the latest safety innovations and energy-efficient engines', the aviation industry expects worldwide another 8,500 private jets will enter service by 2033 (including Blackbird), far outstripping any efficiency gains."



Climate Activists Detained at the “Oscars of the Insurance Industry”

July 09, 2025 by Extinction Rebellion

Early images

“INSURING DISASTER, NOT SURVIVAL”

LONDON 9th July — Climate activists with the Insure Our Survival campaign disrupted the “Oscars of the insurance industry” British Insurance Awards at the Royal Albert Hall tonight, calling out the industry for profiting from climate chaos and genocide in Gaza, while pushing ordinary people to the brink.

Two activists were detained for several hours after getting into the venue and planning to take to the stage to drop a banner. Both have now been released and stand by their actions, saying: "Stop funding ecoside. Stop funding genocide."

As the insurance elite gathered to celebrate their accomplishments this year, activists outside held a die-in on the red carpet, making it hard for attendees to enter. They added a theatrical "F***ing Up the Planet Awards" mocking the biggest insurers for backing oil pipelines, displacing communities, insuring arms exporters and ignoring the climate science.

"These companies talk about resilience, but they're the ones insuring oil pipelines while dropping cover for flood-hit homes," said Lucy Porter, a spokesperson for Insure Our Survival. "They're not part of the solution — they're complicit in the collapse."



Photo credit: Denise Baker

The income made for those in the industry does not come without a cost, at home and abroad. Even in their own communities, we are seeing flooding and destruction of homes. 5.7 million properties in England are currently at risk of flooding [1]. In 2024 alone, the UK saw over £1.6 billion in insured flood losses, with thousands of families displaced [2]. In Yorkshire, Cumbria, and South Wales, some households now face £2,000+ annual flood insurance premiums — or have been refused coverage entirely [3]. Meanwhile, insurers continue to back new fossil fuel infrastructure that worsens

the crisis, including the East African Crude Oil Pipeline (EACOP) and Arctic LNG 2 [4] [5].

AXA and Allianz have come under fire for financial and insurance ties to firms complicit in the Israeli occupation of Palestine, including companies supplying bulldozers, weapons, and surveillance tech used in home demolitions and military operations [6] [7].

“They insure against the destruction of homes abroad, and then leave homes here unprotected,” said another campaign spokesperson. “Their business model is a disaster — so long as it doesn’t affect their balance sheets.”

BRITISH INSURANCE AWARDS: A CELEBRATION OF CLIMATE HYPOCRISY

While the British Insurance Awards claim to reward “innovation and responsibility,” many winners continue to underwrite fossil fuel expansion — a direct violation of international climate goals [8].

Insurers and brokers being called out include:

- Lloyd’s of London — still insuring coal, tar sands, and Arctic oil through its syndicates [9].
- Chubb, AIG — major underwriters of extreme oil and gas projects around the world [10].
- AXA — linked to fossil fuel underwriting and arms-related human rights concerns [6].
- Marsh McLennan — brokers fossil fuel deals including pipelines and coal plants [11].

Many insurers at the British Insurance Awards — including Allianz, Aviva, AXA, Zurich, AIG, RSA, Chubb, QBE, and Liberty Mutual — are not only complicit in climate chaos, but also profit from militarised violence.

They insure or invest in companies supplying military equipment to Israel, including:

- Boeing
- Lockheed Martin
- Elbit Systems
- Maersk (used in military logistics) [12][13][14]

INSURE PEOPLE, NOT POLLUTION

This crisis is personal. Flooding, fires, and heatwaves are here, and insurers are abandoning households while enabling destruction abroad.

It's time to turn public anger into action.

👉 Join the campaign. Demand insurers drop fossil fuels.
👉 Expose their hypocrisy.
👉 Insure our survival — not collapse.

🔗 **[Insure our Survival website]**

NOTES FOR EDITORS

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Extinction Rebellion target Howden and Marsh offices in Shrewsbury

'We need insurers to stop making things worse and step up to be climate heroes,' says protester

Extinction Rebellion targeted the offices of brokers Marsh and Howden in Shrewsbury in an insurance-related protest.



The group went to Marsh's office in Abbey Foregate at 10am on 11 July 2025, before marching up Wyle Cop to visit Howden's branch on the High Street.

The protest was related to fossil fuels, with protesters calling for the support of new projects to be ended. It featured placards, banners and a Grim Reaper,

One protester said: "Here in Shrewsbury we're already feeling the effects of climate breakdown.

"Shropshire farmers are struggling with the current drought. Homes and businesses are suffering as once in a hundred year floods now happen annually.

“We need insurers to stop making things worse and step up to be climate heroes.”

Other protest

The protest came amid supporters of Extinction Rebellion’s Insure our Survival campaign targeting the offices of insurance companies up and down the country in a national wave of action last week.

During the week, Marsh’s Manchester office in Belvedere, Booth Street, was also targeted, with protesters holding a large Stop Eacop (East African Crude Oil Pipeline) banner.

Eacop is a pipeline that is set to transport oil produced from Uganda’s Lake Albert oilfields to the port of Tanga in Tanzania.

One protester said: “We are already seeing the catastrophic effects of climate chaos on our TV screens.

“Instead of displacing poor people to pipe oil across Africa so that big oil can make even more money, we should be leaving it in the ground. Our message is simple – oil companies need to stop drilling and start paying.”

■

Rebels target insurance HQ in solidarity with detained Ugandan protesters - Extinction Rebellion UK



Rebels target insurance HQ in solidarity with detained Ugandan protesters

July 16, 2025 by Extinction Rebellion

Press contacts: Dorothea Hackman 07710 269195 | XR UK press team 07756136396

BREAKING PHOTOS | PERMANENT ARCHIVE

Extinction Rebellion rebels target AIG as part of a national wave of Insure Our Survival actions against insurance companies fanning the flames of climate risk.

At 12 noon today, July 16th, 2025, protesters were at the offices of AIG in Fenchurch Street, London, demanding it does not insure the East Africa Crude Oil Pipeline (EACOP).

Two letters were delivered – one on behalf of local people directly affected by EACOP and another from the #StopEACOP campaign UK.



Outside AIG, activists in red #StopEACOP suits held a die-in by an EACOP pipeline, and others waved fans declaring 'FANNING THE FLAMES OF CLIMATE RISK' while throwing documents entitled 'UNDERWRITING FOSSIL FUELS' and 'INVESTING IN FOSSIL FUELS' into a mock fire.

Zaki Mamdoo, Campaign Coordinator at StopEACOP said: "Activists and defenders outside AIG's offices today stand shoulder-to-shoulder with communities whose lands, livelihoods, and futures have been sacrificed for the EACOP, its associated projects and the repressive conditions that have followed. This demonstration is a reminder that the destruction we face is not accidental; it is the result of a global system that prioritises profit over people, and places corporate power above human life. The struggle for climate justice demands that ordinary people everywhere confront the institutions responsible for this harm because those causing it operate globally, and so must our resistance."

73-year-old retired lecturer and grandmother from Camden Dorothea Hackman said: **"**Insurance companies like AIG wield immense power and could bring an end to the fossil fuel era. Instead, they collude with short-term profiteering polluters and fan the flames of climate risk."

As a result of global pressure, including from Extinction Rebellion, Insure our Future and the StopEACOP campaign [1], 30 major insurers have pulled out of EACOP to date[2]. However, AIG has still to rule out insuring EACOP.

EACOP is a 'carbon bomb' [3], which would unleash 379 million tons of climate-heating pollution – more than 25 times the combined annual emissions of Uganda and Tanzania the host nations. [4] This will fuel extreme weather worldwide and intensify deadly flooding, landslides, heatwaves, and droughts that are already frequent even in the UK [5].

Insurers are complicit in the climate crisis as oil, gas, and coal industries are legally obliged to insure their operations.

In addition to profits from underwriting insurance, client premiums represent immense funds for insurance companies like AIG – globally, £27 trillion of assets are under management, with UK insurers having £1.8 trillion, and much of this is invested in fossil fuels. [6,7]

This is an unsustainable contradiction. While their investment and underwriting continue to give a lifeline to the fossil fuel companies, already over a third of weather-related claims are for climate-attributed losses.[8]

Meanwhile, climate change is doubling or even tripling the cost of home insurance for ordinary homeowners [9] and coverage is denied to many households impacted by climate change.[10]

Yet the size of the renewable energy insurance market is still under 30 per cent of the fossil fuel insurance market.[11] This mismatch of priorities is an obstacle to the urgently needed transition to clean energy. [12]

EACOP has already displaced thousands of families in Uganda and Tanzania and is threatening food and water security and violating human rights, while disturbing critical ecosystems including Lake Victoria and Murchison Falls National Park [13, 14].

TotalEnergies, the majority shareholder and investor of EACOP, is accused by the UN special rapporteur on environmental defenders of 'grave human rights violations against those opposing the projects and against the local communities, particularly in Kingfisher'. [15]

At time of writing, 11 activists, the KCB11, have been detained and refused bail for 84 days for attempting to deliver a letter to Kenya Commercial Bank in Kampala.

"It's hard to imagine a more vivid picture of corporate-state collusion than activists being led into a trap and arrested for trying to share their concerns about a fossil fuel project characterised by rights and environmental harms," said Brad Adams, Executive Director at Climate Rights International.[16]

These national days of action in July will be followed by a wave of international action in September, in solidarity with activists on the front line of new oil and gas projects.

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■

Reading: Extinction Rebellion protest above A329 motorway

The Tax the Rich banner by Extinction Rebellion activists dropped above the A329M between Reading, Wokingham and Bracknell. *(Image: Extinction Rebellion)*

Two mystery banners were seen on a bridge over a busy motorway.

The banners above the A329M bore the slogan 'Your Planet Needs You' while the other said 'Tax the Rich,' and both have since been claimed by Extinction Rebellion.

"Heatwaves are becoming fiercer and more frequent, and not addressing the climate crisis will be far more costly than tackling it," said an Extinction Rebellion spokesperson.

"There is also a growing call for the super-wealthy to be taxed. According to Oxfam, a 2% tax on extreme wealth over £10 million could raise £24 billion every year.

"78% of the British public say they support this. Money raised could supercharge the UK's efforts to tackle climate change."

Greenpeace has called for a one-off "National Renewal Tax" of 2.5% on individual wealth above £10m, to be paid annually over the five years of this parliamentary term, which could raise between £130bn and £183bn. This tax would be paid by 0.1% of the UK population.

The National Renewal Tax on the super-rich could raise between £26bn and £36.6bn on average each year.

"Funds raised would be 'more than enough' to pay for insulating homes, supporting vulnerable households with winter energy bills, providing free bus travel to under 25s, implementing a scrappage scheme for polluting vehicles, retraining works for green energy jobs, upgrading ports, and supporting farmers to clean up waters and return land to nature," the spokesperson said.

"According to a new report, the potential UK economic losses by 2040 due to stranded fossil-fuel assets is £113bn.

"Of the £88bn held in fossil fuel assets by UK pension funds, around £15.2bn is at risk of stranding by 2040.

"Yet BP and Shell are backing off from their 'green' promises, and other fossil fuel companies are still pushing ahead with projects."

A growing number of climate groups are campaigning for the introduction of a wealth tax.

The Pay Up campaign is calling on the government to bring in a series of wealth taxes as an alternative to spending cuts.

Climate groups say the revenue from the ultra-rich could fund investment, restore crumbling public services and help tackle the climate emergency. Opponents have raised concerns that such a move would result in the ultra-wealthy leaving the country.

However, experts say there is no evidence of a mass millionaire exodus from the UK, with the overall number of millionaires and billionaires having risen steadily over the past two decades.

At the same time, the government has little idea of how many billionaires pay tax.
■

Extinction Rebellion protesters 'die' during demonstration at bank



XR protesters 'die' during a demonstration at Barclays in Oxford *(Image: XR Oxford)*



Scientists for XR occupy the Bank of England

July 23, 2025 by Extinction Rebellion

Press contacts: Shana 07546 166787 | XR UK press team press@extinctionrebellion.uk

Photos: https://drive.proton.me/urls/WFVCDS5XJR#OEow1XVNSOdf

Early on Wednesday 23rd of July, five scientists occupied the lobby of the Prudential Regulation Authority (PRA), part of the Bank of England.

Five scientists remained in the PRA's lobby from 8am until 9am, during the morning arrival of employees, demanding capital requirements on fossil fuels in the insurance and banking sectors. Three more offered flyers to staff inviting them

to an international network of financial regulators working for an end to fossil fuels expansion projects. [Signal link]

This protest took place during the second to last week of the PRA's public consultation on climate risk in insurance and banking, entitled 'Enhancing banks' and insurers' approaches to managing climate-related risks' [1]. The protestors argued that the PRA should be doing more to regulate these industries in a way that mitigates climate-related risks, by introducing capital requirements that would discourage providing financial and insurance support to the fossil fuel industry that is leading us ever deeper into climate catastrophe.

Capital requirements are the amount of liquid capital that must be held by a firm, reflective of the risk of their assets, in order to help protect the economy from collapse. Capital requirements on fossil fuels would deem these assets riskier and increase the manditory amount to be held, thereby discouraging the holding of these assets.

The scientists taking part insist that climate and ecological breakdown must be central to discussions around mitigating economic breakdown – allowing insurance and banking sectors to continue to insure and loan to fossil fuel companies does not follow scientific consensus or economic logic. Signs were held with calls to action, "Climate tipping points = economic risk. Stop new fossil fuels, capital requirements now" and "Ecosystem collapse is financial collapse, capital requirements for fossil fuels now".

Signs also quoted Günther Thallinger, Allianz SE board chairman from his March 2025 article 'Climate, Risk, Insurance: The Future of Capitalism' [2] stating "This is about saving the conditions under which markets, finance, and civilization itself can continue to operate. [...] There is only one path forward [...] burning less carbon or capturing it at the point of combustion."

"*Those that work in insurance and at the PRA, like us scientists, know how dire the situation is,*" said Shana, Space Engineer and occupier of the lobby. "*To talk about 'managing climate-risk' in regard to banking and insurance operations whilst ignoring the fact that these same firms are enabling new oil and gas projects is baffling. They're advising companies on how to manage a crisis that these same companies are actively contributing to – it's like giving fire safety training to the person lighting the flames. Instead of just managing risk we need to actively be mitigating risk – something the PRA can do through capital requirements on fossil fuels for banks and insurers.*"

The PRA, in its latest paper on climate risks in the financial sector, admits that most banks and insurance companies are not properly analysing their climate related risks, and the industry requires work at a governance level to better understand climate risks including climate scenario analysis (eg. unprecedented, non linearity, tipping points) to

fully capture future risks [1]. A recent article in the Financial Times quotes senior Bank of England staff who resigned over the deprioritization of climate and nature risks [3].

Capital requirements on fossil fuels is not as radical an idea as it may seem – the European Insurance Authority (EIOPA) recommendeds capital requirements on fossil fuels "to accurately reflect the high risks of these assets" [4] and capital requirements are mentioned in the PRA consultation paper's current iteration. However the PRA still states that no new capital requirements will be imposed on top of what is required now. This results in little financial incentive for banking and insurance firms to reduce their involvement in new oil and gas expansion projects, missing a vital opportunity to incentivise meaningful change in our financial sector.

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Ten Greenpeace activists arrested after suspending themselves from bridge outside Edinburgh

The protesters dangled themselves 25m above the water line, stopping a tanker from delivering gas for 24 hours.

Saturday 26 July 2025 12:38, UK



Protesters suspended themselves from the Forth Road Bridge. Pic: Greenpeace

Ten Greenpeace activists have been arrested after suspending themselves from a bridge over a river to halt a tanker carrying fracked gas.

The Forth Road Bridge outside Edinburgh was closed on Friday due to the demonstration, with Police Scotland alerted shortly after 1pm.

The protesters ended up dangling around 25m above the water level at high tide.



The group said its activists had prevented the tanker from delivering gas. Pic: Greenpeace

Greenpeace announced it had ended the demonstration on Saturday morning, saying it had "achieved what we set out to do".

The group said its activists had prevented the Ineos tanker from delivering the gas for a full 24 hours, because the vessel could only travel to the Ineos petrochemical plant at nearby Grangemouth during high tides.

Its specially trained activists began climbing down their ropes on Saturday morning.

Greenpeace said all 10 descended safely and were voluntarily transported to Port Edgar in South Queensferry, where it said they were arrested by officers from Police Scotland on suspicion of culpable and reckless conduct.

Police Scotland confirmed five men aged between 35 and 40, as well as five women aged between 25 and 42, had been arrested.

It said further inquiries were ongoing and the Forth Road Bridge remained closed to traffic as of Saturday morning.

Read more:
25% of young children now malnourished in Gaza, charity says
Trump issues warning to leaders as he arrives in Scotland

Amy Cameron, programme director at Greenpeace UK, said: "By blocking Ineos, we've drawn global attention to the company's bottomless appetite for plastic production, false solutions and profit for its billionaire boss Jim Ratcliffe."

Describing the "plastic pollution problem" as "massive", she added: "Less than 10% of plastic is currently recycled globally, and this is set to rise to just 17% by 2060, while the amount of plastic we're producing is set to triple.

"The only solution is to address the problem at source which means securing a strong global plastics treaty that imposes legally-binding caps on plastic production."

Greenpeace insists its protest was safe and caused "minimal disruption".

It stressed the climbers had spent weeks training for the demonstration and pointed out the Forth Road Bridge carries low volumes of bus, cycle and pedestrian traffic.

Bank of England 'heist' as ministers face fresh anti-Rosebank oil field protests



Protesters outside the Bank of England. Photo: Fossil Free London

MINISTERS have faced a fresh protest against their possible renewal of permission for the Rosebank oil field, after the original decision was found to be unlawful in a landmark Supreme Court ruling last year.

Fossil Free London activists dressed as robbers emblazoned with the Norwegian flag staged a "heist" at the Bank of England on Monday evening to highlight the "daylight robbery" that approval of of the application for exploitation of the oil field would entail.

Rosebank is the largest undeveloped oil field in the North Sea. If its development goes ahead, this would lead to the release of carbon emissions equal to those produced by all of the world's 28 low-income countries, the activists said.

Chanting "Rosebank Oil is a scam. Labour, do you give a damn?" the campaigners carried sacks labelled "UK taxpayer money" filled with fake cash from a makeshift vault and held placards reading "£1.5 billion for Norway, net loss for UK."

Fossil Free London director Robin Wells said: "It's plain and simple, Rosebank is daylight robbery.

“If allowed, Equinor, a Norwegian oil giant, will rob us blind, hoarding massive profits for themselves and leaving behind nothing but a trail of climate chaos and a net loss for us.

“The UK government needs to stop this carbon bomb and act in the interests of the general public — scrap Rosebank and invest in a just transition.”

In January, the Court of Session in Edinburgh found that a Supreme Court ruling that planning authorities should consider the full climate impact of burning oil from new wells should apply retrospectively to the former Tory government’s decision to approve the Rosebank and Jackdaw oil and gas fields.

The environmental assessments for these projects did not count the greenhouse gases that would be released when the fossil fuels produced by them were eventually burned.

The January ruling said that work on both fields could continue while the new information was gathered, but no oil and gas could be extracted unless fresh approval was granted.

Ministers later confirmed that they would consider the significance of a project’s environmental impact, “while taking into account and balancing relevant factors on a case-by-case basis, such as the potential economic impact and other implications of the project.”

No decisions are expected until the autumn.

The Department for Energy Security and Net Zero was contacted for comment.

Morning Star for Peace and Socialism

Direct Action / 18 August 2025

Activists cut utilities to world's biggest fossil fuel investors declaring 'Summer of Sabotage'



Shut the System activists cut the electricity to Barclays' Barclaycard's Northampton headquarters, August 18, 2025

ACTIVISTS sabotaged utilities infrastructure at the offices of major fossil fuel investors today, declaring the start of “disruption like never before” against fossil fuel finance.

Shut The System cut cables and superglued electrical service cabinets at JPMorganChase and Allianz in London, demanding they stop financing the climate emergency and genocide in Gaza.

At Barclaycard’s Northampton headquarters, activists cut the 5G communications mast serving the building.

The underground climate campaign said the action marked the launch of a period of sustained sabotage against financial institutions deemed “key culprits” in the climate crisis, running until the end of September.

It urged civilians to join a “Summer of Sabotage” by destroying the property and operating systems of institutions providing “critical support to deadly industries globally.”

JPMorgan is the world’s largest fossil fuel investor, while Barclays is the biggest in Europe, according to a June report by Reclaim Finance.

And Allianz is the sixth-largest fossil fuel insurer and insures Elbit Systems, an Israeli arms firm supplying the majority of weapons used in Gaza.

A Shut The System statement said: “We have been forced underground by draconian anti-protest laws.

“The British state has recently shown how much they are willing to suppress peaceful protest.

“History shows direct action and sabotage are highly effective so we cannot stop while the climate emergency wages on and we see the most hopeful path forward is to operate beyond the state’s reach.”

The group has pledged to escalate its actions in October if demands are ignored.

Earlier this year, it cut fibre optic cables at insurance firms in Leeds and Birmingham, disrupted internet access, and carried out nationwide graffiti

actions at Barclays branches during its annual general meeting.

JPMorgan, Allianz and Barclays were approached for comment.

Extinction Rebellion 'unearth the truth' at Welwyn Garden City protest

The Welwyn & Hatfield Times

26 Aug 2025 13:00

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Author: Huw Richards
Print Edition: Welwyn Hatfield Times
Length: 391 words

Body

Extinction Rebellion claim to have "unearthed the truth" about a Welwyn Garden City insurance broker during a demonstration.

On Saturday, August 23, members of Hertfordshire Extinction Rebellion groups, dressed as oil workers and insurance executives, protested outside Howden Insurance in the town centre.

Extinction Rebellion members protest outside Howden, Welwyn Garden City. (Image: Derek Langley)

-The group called the protest due to its belief that Howden "supports the fossil fuel industry".

At the action on Saturday, an oil rig was set up outside the Howden branch, and members of the group dressed as oil workers allegedly "engaged" with Howden-s senior executives.

Phil from North Herts Extinction Rebellion said: "I hope people found our actions today both eye-opening and entertaining. Although there is widespread concern about the climate crisis among the public, the influence of the insurance companies on averting disaster may not be so well known.

"If a new oil or gas project can-t get insurance they simply can-t operate, so the insurance companies are in a uniquely powerful position.

"But companies like Howden are still actively supporting these industries, while at the same time home insurance premiums are doubling or even tripling to pay for the increased risks from extreme weather events like flooding and heatwaves. This is good business for them and a disaster for the rest of us."

(Image: Derek Langley)He added: "Many of us use Howden to insure our homes, cars, and even our pets. But they are secretly making millions by also acting as brokers for new oil, gas, and coal projects - despite dire warnings from scientists.

"We were asking Howden to do the right thing: pull the plug on insuring any new fossil fuel projects - this would send a powerful signal to the industry."

The demonstration was part of Extinction Rebellion's --Insure Our Survival" campaign, urges insurance companies to withdraw from insuring new fossil fuel operations which are believed to be worsening the climate crisis.

Insurance offices up and down the country have been targeted in a wave of nationwide actions, with activists demanding that key insurers stop backing destructive new fossil fuel projects and end their complicity in climate disaster and human rights abuses.

When contacted, Howden did not wish to comment.

(Image: Derek Langley)

Classification

Industry:
Insurance (92%), Insurance Overview (92%), Fossil Fuels (89%), Insurance Agencies & Brokerages (89%), Energy & Utilities (89%), Homeowners Insurance (78%), Property & Casualty Insurance (78%), Natural Gas Extraction (75%), Insurance Premiums (73%), Coal Industry (50%)

Subject:
Protests & Demonstrations (91%), Negative News (90%), Environmental Activism (90%), Negative Misc News (90%), Fossils (89%), Negative Environmental News (89%), Climate Change (89%), Severe Weather (88%), Environmental Accidents & Disasters (79%), Activism (78%), Negative Personal News (78%), Executives (77%), Floods & Flooding (73%), Heat Waves (68%), Weather (68%), Extreme Temperatures (68%), Human Rights Violations (63%), Human Rights (60%)

Climate protesters removed from Reform conference after heckling Nigel Farage

The protesters from Climate Resistance targeted the Reform leader to accuse him of working for super-rich donors.



A protester is removed from an address by Reform UK leader Nigel Farage during the party's annual conference (Jacob King/PA) (PA Wire)

Three climate protesters were carried out of the Reform UK party conference after shouting at Nigel Farage while he was on stage.

The protesters from Climate Resistance, a group calling for the government to tax the super-rich to fund public services and climate action, had planned to interrupt the Reform UK leader and Clacton MP during his keynote speech.

But he delivered it several hours earlier than originally planned after Angela Rayner resigned from the government.

They staged their protest as Mr Farage returned later to appear with special guest Preston Manning, the founder of Canada's now-defunct Reform party.

Climate Resistance targeted Mr Farage to accuse him of working for super-rich donors, such as property tycoon Nick Candy.

“You work for billionaires!” one shouted at Mr Farage.

Another said he was “paid by the super-rich to scapegoat migrants”.

Mr Farage paused to say: “Off you go, mate…boring!”

One shouted “f*** the fascists” and “tax the rich” as security guards carried her out.

The audience chanted “out out out” and booed her.

Sam Simons, spokesperson for Climate Resistance, said: “Farage will go on national TV and say how he cares about the people in the UK, and then vote to keep us from getting our sick pay.

“This grifter will scapegoat anyone just so we don’t talk about the oil barons and billionaire property tycoons who fund him.

“It’s really about keeping everyone so divided and downtrodden that we won’t even have time to think about taxing the super-rich.”

Mr Simons added: “Meanwhile, the super-rich are fanning the flames of climate collapse with their lavish lifestyles, and exploiting people and the planet for profit.

“The top 10% in the UK hold more wealth than all the rest of us combined, and pollute far more than ordinary people.

“The majority of Britain wants a wealth tax. It’s time to tax the super-rich and finally do what Reform never would: fund our schools, our hospitals, our climate and our futures.”
■

Campaigners around the country fight to stop Rosebank



CAMPAIGNERS to stop Rosebank took to the streets across the country on Saturday, protesting outside the offices of oil giants and in Prime Minister Sir Keir Starmer's backyard.

In Aberdeen, environmentalists joined forces with Scottish Palestine Solidarity Campaign (SPSC), protesting at the offices of Equinor and Ithaca to call for a ban on the development of the 300-million barrel field.

Speaking from the protest — one of almost 20 which took place around the country — Aberdeen SPSC activist, Kate Ramsden told the Star: "Rosebank isn't just an environmental disaster, Ithaca's involvement would generate hundreds of millions for Delek who are already literally fuelling the genocide in Gaza.

"Starmer needs to locate his conscience and stop Rosebank."

Four hundred miles away, campaign groups including Mothers Rise Up took that same message to the heart of Sir Keir's Holburn and St Pancras constituency.

Mothers Rise Up's Lorna Powell said: "Approving new fossil fuel projects like Rosebank in the context of an escalating, deadly climate crisis is simply unjustifiable."

The Department for Energy Security and Net Zero said its priority was to “deliver a fair, orderly and prosperous transition,” but could not comment on individual licences.

■

Two insurers named as targets in next Extinction Rebellion climate protest offensive

Two insurers are in the sights of Extinction Rebellion's next coordinated climate protest campaign

Insurers operating in the UK have been warned to expect a fresh wave of coordinated climate protests in September.

Activist group Extinction Rebellion (XR) has confirmed plans to target companies it says are enabling fossil fuel projects and arms trading.



Its campaign – dubbed *Insure Our Survival* – is set to run from 8 to 22 September 2025, with large-scale demonstrations confirmed for London on 8 and 9 September and further actions planned nationwide.

XR said the campaign would include coordinated actions in Europe, the Americas, Africa and Asia, with groups in the Global North working alongside those in the Global South to "amplify frontline voices" opposing fossil fuel and arms financing.

Targeted insurers

XR said the campaign will focus on international firms Axa and AIG, saying the call for action is an effort to draw attention to the broader insurance sector's role in underwriting high-carbon and defence projects.

The group claims fossil fuel and arms insurance represent just 2% to 3% of targeted firms' portfolios, arguing they could be removed without material financial harm.

Insurers have faced increasing scrutiny from climate campaigners in recent years, with several large players adopting restrictions on coal, oil and gas underwriting in response to public and shareholder pressure. However, XR maintains that such commitments remain inadequate to meet climate goals.

The September actions will form part of XR's ongoing global pressure campaign, which the group says will continue until targeted insurers commit to stopping fossil fuel and arms underwriting.

■

Protesters project ‘toxic’ images onto insurers’ City offices

‘Axa and AIG present themselves as protecting homes and families, yet continue to underwrite projects that accelerate climate breakdown and fuel conflict,’ says spokesperson

Activists staged protests at the City of London offices of Axa and AIG yesterday (8 September 2025), blocking access to the buildings and calling on insurers to stop underwriting fossil fuel and defence-related risks.



The demonstration formed part of a two-week wave of coordinated global actions led by campaign group Insure Our Survival, which is planning protests across more than 30 cities worldwide between 8 and 22 September. Demonstrations are also scheduled in London for today.

According to organisers, the London blockade began around 8am outside Axa’s offices, with campaigners dressed in suits and gas masks carrying placards urging a boycott of Axa and AIG. Activists also threw fake blood-stained £50 notes and projected images onto buildings as part of the action.

The campaigners accused both insurers of profiting from fossil fuel expansion and from companies linked to armed conflict. They argued that such underwriting activities account

for less than 2% of global insurance profits, suggesting that insurers could exit the sectors without significant financial impact.

Lucy Porter, UK spokesperson for Insure Our Survival, said: "Axa and AIG present themselves as protecting homes and families, yet continue to underwrite projects that accelerate climate breakdown and fuel conflict."

Carbon boycott

Yesterday's London action followed a weekend of projection protests at Axa and AIG offices in London, Paris, Cologne, Johannesburg, Manchester, Glasgow, Auckland and Ipswich. Images of senior executives wearing gas masks were projected onto buildings, which campaigners said symbolised insurers' exposure to "toxic" industries.

Research cited by organisers alleged that Axa holds investments in fossil fuel firms linked to so-called "carbon bomb" projects, including coal, oil sands and shale operations. At the same time, AIG has been identified as one of the world's largest coal insurers with more than $24bn (£17.73bn) invested in fossil fuel-related assets as of 2022.

Extinction Rebellion (XR) previously occupied AIG's office in London on October 30, 2024.

Speakers from climate and political groups, including Palestine-focused organisations, also scheduled addressed the demonstration throughout the day.

Insure Our Survival said it is also encouraging consumers and businesses to boycott other large insurers, including Allianz and Aviva.

Extinction Rebellion (XR) previously protested at the Premiership rugby final on June 14, 2025, to demand that the Rugby Football Union (RFU) end its sponsorship deal with Allianz.

■

Extinction Rebellion protesters stage ‘die in’ at Barclays Bank in Reading



Protesters from Extinction Rebellion performed a 'die-in' at Barclays Bank in Reading to link fossil fuel funding to climate change and global deaths.

Extinction Rebellion says: "Around the world, millions of people are dying as a result of heatwaves, wildfires, torrential rain, drought, flooding and landslides, all caused by changes in our climate brought about by the constant increase in greenhouse gas emissions.

"Barclays Bank is still funding fossil fuel projects which contribute to climate change, thus indirectly contributing to the deaths of humans and wildlife.

"Analyses from the World Weather Attribution organisation show that extreme weather is becoming more likely due to climate change.

"Heatwaves are the deadliest type of extreme weather globally, contributing to at least 500,00 deaths a year, including some in the UK. Researchers from the London School of Hygiene & Tropical Medicine (LSHTM) and Imperial College London, estimate that high heat killed 2,300 people across 12 major cities as temperatures soared across Europe this summer. They attributed 1,500 of the deaths to climate breakdown, which is heating the planet and making the worst extremes even hotter."

Dr Ben Clarke, researcher at the Centre for Environmental Policy at Imperial College London, said: "Heatwaves don't leave a trail of destruction like wildfires or storms. Their impacts are mostly invisible but quietly devastating – a change of just 2 or 3C can mean the difference between life and death for thousands of people.' He warned that countries need to speed up the transition from fossil fuels to renewable energy.

Greece, Turkey and Cyprus suffered devastating wildfires. Greece experienced a heatwave above 45C, drought and strong winds. At least 17 lives were lost, including 10 firefighters and rescue workers.

An intense two-week heatwave in Norway, Finland and Sweden was hotter, with temperatures of 30C and more, resulting in many more hospital admissions.

A new study, published in the medical journal JAMA, links more than 400 additional deaths to the wildfires in Los Angeles earlier this year. The study comes as hundreds of wildfires burn across the US and Canada.

Climate change not only increases the risk of wildfires around the world but also makes them particularly explosive. Relatively small blazes rapidly "blow up" so suddenly and with such ferocity that they become difficult to control.

Climate change also intensified heavy monsoon rain in Pakistan, which suffered its worst floods on record, killing hundreds of people.

In late June 2025, several days of heavy rainfall swept across Colombia and Venezuela, causing widespread flooding, overflowing rivers, and numerous landslides, one of which killed 27 people.

Moscow suffered its worst flooding since 1879, with some parts experiencing far more than the monthly average.

These extreme weather events will only continue to become worse if governments do not do more to reduce emissions from greenhouse gases such as carbon dioxide and methane·

Extinction Rebellion will pose as dead bodies (a 'die-in') to remind people of how they say that Barclays continues to fund projects that are contributing to over-heating planet Earth. Extinction Rebellion also says that they also hope to encourage visitors to the branch to move their accounts from Barclays to other banks with much 'greener' credentials.



■

Extinction Rebellion protestors spotted in Ipswich

Ipswich Star

15 Sep 2025 11:27

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Author: Paris Maben-Hume
Print Edition: Ipswich Star
Length: 271 words

Body

Extinction Rebellion protestors were seen outside a block of offices in Ipswich.

Local activists for the environmental movement in the Suffolk town and nearby Colchester are taking part in a coordinated global campaign targeting insurance giants AXA and AIG.

The campaign started on September 8 and will run until September 22.

It is calling for a boycott of the insurance giants and their sub-brand and is urging people to switch providers.

READ MORE: School pledges 'rapid' change after being issued with government warning

The protestors held up banners outside the entrance to the office block(Image: Newsquest)

On Monday morning, Extinction Rebellion Ipswich was protesting outside the AXA building at Brooke Lawrence House in Civic Drive.

The group held up banners which read: "We are all vulnerable. Stop insuring fossil fuels."

Blue and white tape saying "climate crime scene" was put up on the entrance steps to the office block.

They also handed out flyers to passers-by and AXA staff.

READ MORE: Hundreds of staff at housing association have data leaked in payroll breach

Tina, from Extinction Rebellion Ipswich, said: "Ipswich is on a tidal river, so people are already living with the risk of flooding, and this will only get worse as the climate gets hotter.

"New homes have just been built along the riverside. How long will it be before these become uninsurable?

"Knowing that AXA is not only profiting from these crises but exacerbating them while claiming to protect us is outrageous.

"As we have a large AXA office here in Ipswich, I thought it was important to join this global campaign to highlight this issue locally."

Classification

Industry:
Insurance (90%), Insurance Overview (90%), Energy & Utilities (73%), Data Breaches (66%), Fossil Fuels (54%)

Subject:
Negative Misc News (93%), Environmental Activism (92%), Protests & Demonstrations (91%), Negative News (90%), Activism (90%), Community Activism (90%), Environmentalism (78%), Environment & Natural Resources (78%), Negative Personal News (78%), Government & Public Administration (71%), Negative Technology News (68%), Rivers (66%), Data Breaches (66%), Crime, Law Enforcement & Corrections (53%)

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Wash It Off: Private jet sprayers found guilty



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 today. They took action with Just Stop Oil to demand the UK government negotiate a treaty to phase out oil and gas by 2030. [1]

Jennifer Kowalski, 29, from Dumbarton, and Cole Macdonald, 23, from Brighton, had cut through the wire perimeter fence and sprayed paint from a fire extinguisher onto two private jets parked at Stansted Airport, just hours after Taylor Swift's plane had landed. [2]

After the 4 day trial the jury returned a unanimous verdict of guilty. Sentencing will be on the 27th of October.

During the trial, the prosecution argued that extensive professional cleaning was required for the two planes after the action. The total cost of cleaning was assessed to be around £12,000.

The defendants told the jury they did not set out to cause damage. They explained that they had deliberately avoided spraying the engines and cockpits and believed the diluted

paint would wash off easily. They argued that they lacked the necessary criminal intent: they neither intended to cause damage nor realised that damage was a likely consequence of their actions.

In her defence Jennifer Kowalski explained that the action had been designed to target Taylor Swift's plane because of her personal interest in the famous singer and the immense influence that she carries. She said:

"She's one of the most famous people in the world; she's talked about everywhere, she's the only singer ever to be named Time Magazine Person of the Year; she earned 2 billion dollars last year; reporters devote their lives to covering her; if we devoted that much energy to tackling climate change we could change things.

"I thought a lot about what she might say – if we could get her attention – if she saw this it might get a reaction from her, from a place of care from a fan, instead of from a place of apathy – she's famous for saying how much she loves her fans, and yet her fans are dying because of climate change."

At trial, Judge Mill ruled that the damage was too serious for the rights to free expression and assembly under Articles 10 and 11 of the European Convention on Human Rights to apply. As a result, the jury was not asked to consider whether a restriction on the defendants rights to protest was proportionate response in the light of the alleged damage, and that defence was blocked from the trial.

Following the verdict Cole MacDonald said:

"We were released from remand the day before the general election that elected a left wing government and that under that government the country has slipped into fascism and has become continually more corrupt."

Jennifer Kowalski said:

"I broke into Stansted airport to spray paint Taylor Swift's private jet because this is a dangerous time – the era of global boiling. This era will not end when it's time for a new album – it's the era to end all others.

"*When I look out people's windows, I see entire settlements swept off the map and thousands killed by climate disasters. On this reckless path 1 billion people will be displaced by 2050. When you strip people of their basic rights and cram them into perilous conditions violence inevitably ensues.*

"But it's not too late to be brand new. I just think you are what you love. And I'll fight for the music and people I love. Won't you?"

While two young people face an uncertain penalty for taking action targeting private jet use, it is estimated that 80% of the world's population has never taken a flight. Just 1% of people cause 50% of global aviation emissions and private jet users are responsible for up to 14 times as much carbon emissions compared with a commercial flight. A single flight in a private jet can easily emit as much carbon dioxide as the average annual carbon footprint for an EU citizen – 8.2 tonnes. Private aviation contributed at least 15.6 Mt CO_2 in direct emissions in 2023, or about 3.6 t CO_2 per flight. Almost half of all flights (47.4%) are

shorter than 500 km. Private aviation is concentrated in the USA, where 68.7% of the aircraft are registered. [3] [4] [5][6]

Morning Star for Peace and Socialism

Scotland / 22 September 2025

Insurance giant accused of 'keeping killers safe' at Glasgow protest



Protesters outside AXA offices. Photo: Extinction Rebellion Scotland

GreenChristian
Responding to the Cry of the Earth

Stop Rosebank



Any day now, the UK government will face a major climate test. Equinor is expected to reapply to develop Rosebank: the biggest undeveloped oil field in the UK.

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Activists disrupt BP panel over hurricane-fuelling profits



[Pic: Fossil Free London]

ACTIVISTS have disrupted a panel event featuring senior BP executive Stewart Macfarlane, as the oil giant announced quarterly profits of $2.2 billion (£1.7bn), surpassing analysts' forecasts.

Campaigners from Fossil Free London interrupted the discussion on Tuesday evening, chanting: "As Hurricane Melissa tears down lives, do your profits help you sleep at night?" before being escorted out of the event hosted by the Association of International Energy Negotiators at Simmons & Simmons LLP's London office.

The protest came just days after Hurricane Melissa devastated Jamaica, with scientists warning that the climate crisis intensified the storm's impact.

BP has faced mounting criticism after scaling back its climate commitments.

Earlier this year, the company increased its annual investment in oil and gas to $10bn (£8.2bn) while cutting more than $5bn (£4.1bn) from its low-carbon spending plans.

A Global Witness analysis found that the rollback could cause around 72,000 additional heat-related deaths worldwide by the end of the century.

Fossil Free London director Robin Wells said the BP profits show that the company's "green mask has slipped to reveal the oily mouth behind," accusing the firm of fuelling global destruction while "CEOs and shareholders wine and dine in luxury."

■

Campaigners disrupt Oil Executive awards dinner in London

To highlight damage caused by the oil and gas industry, campaigners from Fossil Free London interrupted the World Energy Council Assembly's dinner at the Hilton in Mayfair on 3 December.

Oil and gas executives had gathered to present and receive industry "achievement awards". Award nominees and attendees included Shell, BP, and Ithaca Energy.

Campaigners chanted "no awards for climate criminals", as they were dragged out of the building by security.

The protest comes after devastating flooding has killed at least 1,250 people across much of southeast Asia in recent days. Human-caused climate breakdown has increased the intensity of such extreme weather events.

Oil damages

A report recently found that oil and gas giants are responsible for €25 trillion in climate damages. Now, survivors of Super Typhoon Odette in the Philippines are suing Shell for damages, in a legal first for holding big oil accountable for its role in climate destruction.

Robin Wells, Director of Fossil Free London said:

> *Whilst executives drink champagne in tuxedos, the world floods outside. They pat themselves on the back for the 'deal of the year', whilst their projects sign death warrants for communities in the Global South and future generations everywhere.*
>
> *How can it be that business as usual awards the fossil fuel corporations that depend on the systematic destruction of our life support systems? The science is clear: every new oil field is an act of violence. We crashed their party to remind them that history will not give them an award; it will put them on trial.*

Featured image via the Canary

■

DE Southern Daily Echo Follow 9.1K Followers

Arrest made as climate activists stage protest in Southampton

Story by Ross Marshall • 5mo • 1 min read



The protesters took to Threefiled Lane in Southampton (Image: NQ)

A woman has been arrested during a climate protest in Southampton today.

Campaign group, Cut The Ties To Fossil Fuels, have taken to Threefield Lane in Southampton to stage a demonstration today.

The group were seen holding signs and banners, reading 'cut ties to carbon pollution' and it is understood that police arrested one of the protesters at the scene.

Hampshire police have been approached for more information on the arrest.

A police spokesperson said: "We were called at 12:41pm today (Wednesday 10 December), to reports of a protest at a business on Threefield Lane in Southampton.

"Officers are in attendance.

"Policing these events requires us to balance the rights of those lawfully protesting, and the rights of others to go about their lives without being subject to unacceptable disruption, whilst keeping the public safe.

"Our priority with protests is always public safety."

Activists stage Extinction Rebellion protest against private jet expansion in London



Extinction Rebellion campaigners gather outside the Macquarie Group headquarters to protest the proposed expansion of Farnborough Airport. Two activists, dressed in airplane costumes, occupy the entrance canopy while unfurling a banner that calls for a ban on private jets and urges the investment firm to sever its connections to fossil fuels. The demonstration highlights the environmental impact of business aviation, as the Australian-based global financial services group faces criticism over its majority ownership of the airport and its plans to increase annual flight limits. (Photo by Joao Daniel Pereira/Sipa USA)

■

Cut ties to Big Oil to stop energy crisis sparked by Trump's war on Iran – protest footage

Outside the US Embassy in London on 1 April, two activists were tied by fuel hoses to a life-sized petrol pump in response to Donald Trump's war on Iran.

The protest criticised the increase in oil company profits in the wake of the war's destruction and trade disruption. The pump carried the label: "Oil Profit$$$ for Oil Bosses".

Campaigners from Fossil Free London held signs saying "Stop Trump Tying us Into Fossil Fuels", "Break Free from Climate Crisis" and "Break Free from Big Oil".

Thousands have died to date across the region following US and Israeli attacks on Iran. Trump has recently stated his intention to "take the oil in Iran" following major attacks on fossil fuel infrastructure.

Meanwhile, oil dependency is increasing the cost of living once again for families in the UK as petrol prices rise. Whilst fossil fuel companies stand to make a windfall of billions on the back of the price shock.

One of Reform's major donors, Jeremy Hoskings, has seen his fossil fuel and energy hedge fund investments rise by more than $25m since the war began in Iran.

This comes as Trump and Reform are using the oil price spike to call for our government to approve new UK oil and gas projects, like the controversial Rosebank oil field. Despite the fact that drilling in the North Sea would not make the UK more energy secure. If production began, Rosebank's oil would still go for export – like 80% of all UK oil.

Robin Wells, director of Fossil Free London said:

> *Right now we are seeing the horrors of Trump's war on Iran in the faces of dead schoolgirls and facing skyrocketing energy costs at home. And Big Oil cashes out big, with bumper profits.*

We're protesting today to say that for as long as the UK stays tied up in fossil fuels, we'll see more oil wars, more extreme weather deaths and more instability.

The UK needs to cut ties with Trump and Big Oil. We need to break free from this knot of violence.

That starts with scrapping new UK oil and gas and rejecting Rosebank. Until then, being tied into Big Oil's big disaster leaves us paying the price.

Featured image via Fossil Free London

■

FØSSIL FREE LONDON

PHOTOCALL: Body bags piled outside Equinor as Q1 profit spike expected from Iran war

When: 8.15am, Tuesday 5th May

Where: Equinor Offices, W2 6BD

Details: Activists from Fossil Free London will pile several life-sized body bags outside the offices of Rosebank co-owner Equinor, as one campaigner dressed as an oil executive stands on top of them.

The protest comes as the UK Government's decision on whether to approve or reject the Rosebank oil field approaches.

Equinor's quarterly profits are **also expected to jump** when announced on Wednesday 6th May, amidst the US-Iran war.

Photos can be used in coverage of Equinor's quarterly profit announcement.

(We will also stage a stunt ahead of Shell's Q1 profit results on Wednesday the 6th at 8:15 a.m. outside Shell's HQ, we will send a separate photocall tomorrow.)

For further information, to find us on the day, or to organise an interview please contact campaigner@fossilfreelondon.org, or 020 3886 2590.

Notes:

1. For further information, please contact Rosie, 020 3886 2590, **campaigner@fossilfreelondon.org**.

2. Fossil Free London is a grassroots climate group that protests Big Oil and campaigns for a London beyond fossil fuels. Instagram: **@fossilfreelondon** Twitter: **@fossilfreeldn**.

3. Photos from other Fossil Free London actions are available **here** and can be used in your journalism at any time without prior permission. Please credit Fossil Free London.

Protesters take aim at Aviva as shareholder meetings face disruption



The tie-up will create a significant force in the motor insurance sector (Alamy/PA)

Aviva's York offices were disrupted by protesters targeting the insurer's activities in the latest twist in a turbulent season for shareholder meetings.

It comes after NatWest's annual general meeting (AGM) was halted by activists accusing the bank of backtracking on climate commitments.

Campaign group Boycott Bloody Insurance claimed to be behind 12 people with shares in Aviva disrupting its AGM on Wednesday.

Several protesters shouting and chanting outside a boardroom were escorted or carried out of the building, delaying the start of the meeting.

The group claims Aviva underwrites or invests in companies profiting from immigration detention and surveillance, fossil fuel giants and weapons firms.

Andrew Taylor, a campaigner at Boycott Bloody Insurance said: "Aviva likes to present itself as an ethical business, but when you look at the companies it supports, that turns out to be a sham."

Aviva declined to comment on the protests.

Meanwhile, following a shareholder vote at the AGM, some 8.4% of votes were cast against the motion to approve Aviva's climate-related financial disclosures for 2025, while 5.5% of votes were against approving the pay policy for directors.

Aviva's chief executive Amanda Blanc took home a pay packet of £9.76 million last year.

The disruption comes a week after NatWest was forced to stop its AGM for about half-an-hour amid disruption during its chairman's opening speech.

Protesters were singing and making statements about NatWest's climate policies, while shareholder activists called on the banking group to address claims it had "reduced the ambition of its fossil fuel policy and climate targets".

Rick Haythornthwaite, NatWest's chairman, defended its policies and said the financing of oil and gas comprises 0.6% of the group's total lending.

Meanwhile, Barclays is expected to be targeted at its AGM in London on Thursday, with activist groups including the Palestine Solidarity Campaign and Campaign Against Arms Trade organising a protest outside the meeting.

■

Fossil Free London pours fake blood outside Shell offices as it ‘makes a killing’ from the Iran war



Fossil Free London campaigners protest outside Shell’s London headquarters against its giant profits from the Iran war [Pic: Fossil Free London]

FOSSIL Free London activists covered themselves in fake blood as they sat outside Shell’s London headquarters wrapped in a fuel pump today.

They erected a banner that read “BLOOD MONEY: No new oil & gas” amid expectations the fossil fuel giant will announce bumper quarterly profits today thanks to the Iran war.

Fossil Free London spokesperson Robin Wells said: “In these past few years, as our world becomes more unstable and the realities of climate breakdown set in, it’s never been clearer: Big Oil profits from, and locks in, mass death.

“And we’re feeling this so rawly right now. As we see thousands slaughtered in Iran and weep alongside those mothers who will never hold their children again, Shell is making a killing.”

More than 2,000 people have been killed by the US and Israel’s war in Iran, which has sent oil prices soaring due to a blockade on the Strait of Hormuz.

Barclays shareholder meeting targeted by Palestine and climate activists

Disruption broke out at the beginning of the shareholder meeting in Westminster on Thursday.



Protesters outside the Barclay's AGM in Westminster (Rebecca Speare-Cole/PA) (PA Wire)

Barclays faced a chaotic annual shareholder meeting as Palestine and climate activists repeatedly confronted the lender's board over its ties to Israel and fossil fuel financing.

The UK's biggest bank has come under fire in recent years for its links to Israeli government bonds and defence firms producing equipment used in attacks in the Gaza Strip, as well as companies driving large amounts of planet-heating emissions.

Disruption broke out at the beginning of the shareholder meeting in Westminster on Thursday, with groups of people being pulled out by security.

Chairman Nigel Higgins' opening remarks were repeatedly interrupted as protesters stood up holding Palestinian flags and shouting comments such as "Free, free Palestine" and "Everyone here is profiting from genocide".

Mr Higgins responded that the board had “heard your point” and would take questions on the topic during the meeting’s Q&A section.

A few minutes later, climate protesters rose from their seats and started singing: “Stop, in the name of love, before you break this Earth.”

One shouted: “This bank is financing the climate and nature crisis that we have to stop. Softly-softly, slowly-slowly is not good enough. You are endangering life on Earth.”

As the meeting moved to shareholder questions, the board was repeatedly quizzed about its recent fossil fuel financing.

Shareholders accused executives of failing to act with enough urgency over the climate crisis and criticised the board for leaving a key industry climate group, the Net Zero Banking Alliance.

A representative from ShareAction, which campaigns for responsible investment, called on the board to affirm that it will stick to its climate goals in light of its continued lending to oil and gas firms.

Mr Higgens said Barclays has “no intention of backtracking on its commitments” and remains on track to meet climate targets that it says are aligned with the UN Paris climate agreement to limit the worst impacts of global warming.

“I know this sometimes frustrates people who would like to see us move further, but we have got a big emphasis on consistency, not chopping, changing, going backwards, sideways,” he said.

On its oil and gas lending, Mr Higgins said the bank hit “quite demanding” targets for reducing financed emissions in the energy field and power sector early, although he also acknowledged that progress is “not going to be linear”.

In light of growing global energy demand and price shocks driven by the US-Israeli conflict with Iran, he said: “We feel we have to balance the planet with energy security, energy affordability and also ramping up our transition and sustainable financing activities.”

The board was also challenged about Barclays’ ties to the Israeli government after a UN report last year identified the bank as one of several firms implicated in profiting from a “genocidal economy” in Gaza.

Mr Higgins said the bank does not understand the “report”.

“We’ve read it and we don’t agree with the characterisation of the financial sector in it,” he said.

On its dealings with foreign governments, the chairman said the bank “tries to follow the policies set out by the British Government”, which continues to support Israel’s right to defend itself.

“These are deeply political and complicated questions and at one level, certainly, we take a steer from where our country’s Government is,” he said.

He added: “We do provide finance to a number of international defence companies who provide arms for the defence of this country, for the defence of Ukraine, and that is what the bank does.”

Asked if the bank will commit to supporting the sovereignty of the Palestinian people in any future dealings with Israel and its associated companies, Mr Higgins said: “The thing we all wish and pray for is peace in the region and reconciliation and an end to the appalling human cost on all sides of whichever frontiers you’re looking at.

“And all of the discussions around our policy, we shouldn’t lose sight of that fact – that is by far and away the most important thing to wish for.

“But I’m afraid I’m not going to go into our financing policies on specific clients.”

One shareholder shouted: “That’s not going to happen, Mr Chairman, unless commercial companies and banks stop financing Israel.”

City firms continue to face protests over their impact on people and planet, with NatWest’s AGM halted last week by activists accusing the bank of backtracking on climate commitments.

Wednesday also saw the London offices of insurance giant Aviva targeted by activists claiming the company underwrites or invests in companies profiting from immigration detention and surveillance, fossil fuel giants and weapons firms.

■

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW16

This is the exhibit marked "AJW16" in the witness statement of Alexander James Wright.

About us

Just Stop Oil was a nonviolent civil resistance group in the UK. In 2022 we started taking action to demand the UK Government stop licensing all new oil, gas and coal projects. We have won on this. **Civil resistance works.**

Just Stop Oil ended its street campaign in 2025, whilst we continue to support our action takers through the courts and in prison.



Two Just Stop Oil supporters found guilty for Heathrow paint spraying following retrial

Court & Prison, Press / May 14, 2026

Two Just Stop Oil Supporters who sprayed Heathrow departure boards with orange paint during the Oil Kills, international uprising to end fossil fuels in July 2024 have been found guilty in a retrial after the jury in an earlier trial failed to reach a majority decision. [1]

Phoebe Plummer and Jane Touil were appearing before Her Honour Judge Duncan at Isleworth Crown Court for the second time accused of criminal damage over £5,000 for their action on 30 July 2024 to demand a fossil fuel treaty to end oil and gas by 2030. [2] [3]

Following the verdict Jane Touil said:

"Since I took action, global fossil fuel use and emissions have continued to rise. More than ever, we need a global fossil fuel treaty to help governments rapidly phase out fossil fuels."

"What we do at this moment in history matters. But there is a difference between laws and morality. The courts apply the law made by powerful people. Morals come from within. It is our morals that give us our conscience. I have always tried to live according to my conscience."

Phoebe Plummer said:

"The climate crisis is the greatest injustice that humanity has ever faced. We should all consider what to do at this time. No individual caused this crisis and no one is solely responsible for stopping it. But we can choose what we do to alleviate suffering. I feel compelled to act to be a responsible citizen, a loving aunt and a good person. It compels me to hope for a better future and one where my nephew grows up. I didn't think the action would change government policy. But non violent civil resistance is a necessary part of tackling the climate crisis and I'm grateful and proud to have been part of that. "

Phoebe was remanded for 58 days and Jane for 14 days following the 2024 action in which the pair used fire extinguishers to spray diluted water-based paint in Terminal 5 including at the departure boards. The Crown alleged that the action caused £8,000 worth of damages and that three of the display screens needed to be replaced. [4]

At trial, Judge Duncan ruled out several legal defences for the action including those of 'reasonable excuse' under Articles 10 and 11 of the ECHR, 'necessity' and 'self defence' on the grounds that the threat from climate change was not proximate enough and the actions too far removed from the threat. The defendants were allowed to argue belief in consent : that they honestly believed the owners of Terminal 5 would have consented to the damage if they knew of its circumstances. However, evidence of the relevant circumstances was to be limited to the fact that it was a climate protest with all evidence about the scale and urgency of the climate crisis ruled *'irrelevant and therefore inadmissible'*.

In giving evidence, Jane Touil said:

"I genuinely and sincerely believed that if the shareholders [of Heathrow] had a full understanding of the situation we are in they would have given their consent to our action.

"Most people believe there is something that is wrong with climate but not many people have access to the full situation because the fossil fuel industry has used their immense wealth to ensure that governments do not act and it is not reported in the mainstream media.

"So I don't know if shareholders have a full understanding, but I know that if they did, they would be doing all in their power to stop fossil fuels because there will be no business as usual, no functioning society,

In her evidence Phoebe Plummer said:

"I want to make it very clear that this was not a protest against Heathrow, or anyone flying through Heathrow that day. It's true that the aviation industry is especially harmful to the climate in terms of emissions, though it is a small number of frequent fliers and private jet users who cause the vast majority of this harm, not families who save up for a holiday once a year.

"But this wasn't about getting people to stop flying…I made this individual change to live in line with my values, but honestly I know that it's pretty inconsequential. Even if we all woke up tomorrow and stopped flying and went vegan, it would be like mopping up a spill from an overflowing bath whilst leaving the tap on. All individual changes are like this when we are facing a systemic issue. If fossil fuels are extracted from the ground, then they will all be burnt, even if it's not on a flight that you're on. We need systemic change, that has always been Just Stop Oil's demand."

"My intention was not to cause damage. My intention was to take part in an act of nonviolent civil resistance, raising a serious alarm bell to the catastrophic future in store for us if we persist in our addiction to fossil fuels."

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.

ENDS

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW17

This is the exhibit marked "AJW17" in the witness statement of Alexander James Wright.


JUST STOP OIL
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Law
!! NEW PROJECT ALERT !!
The rich are killing us. To stop them and fix our broken country we need to...
Take back POWER
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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

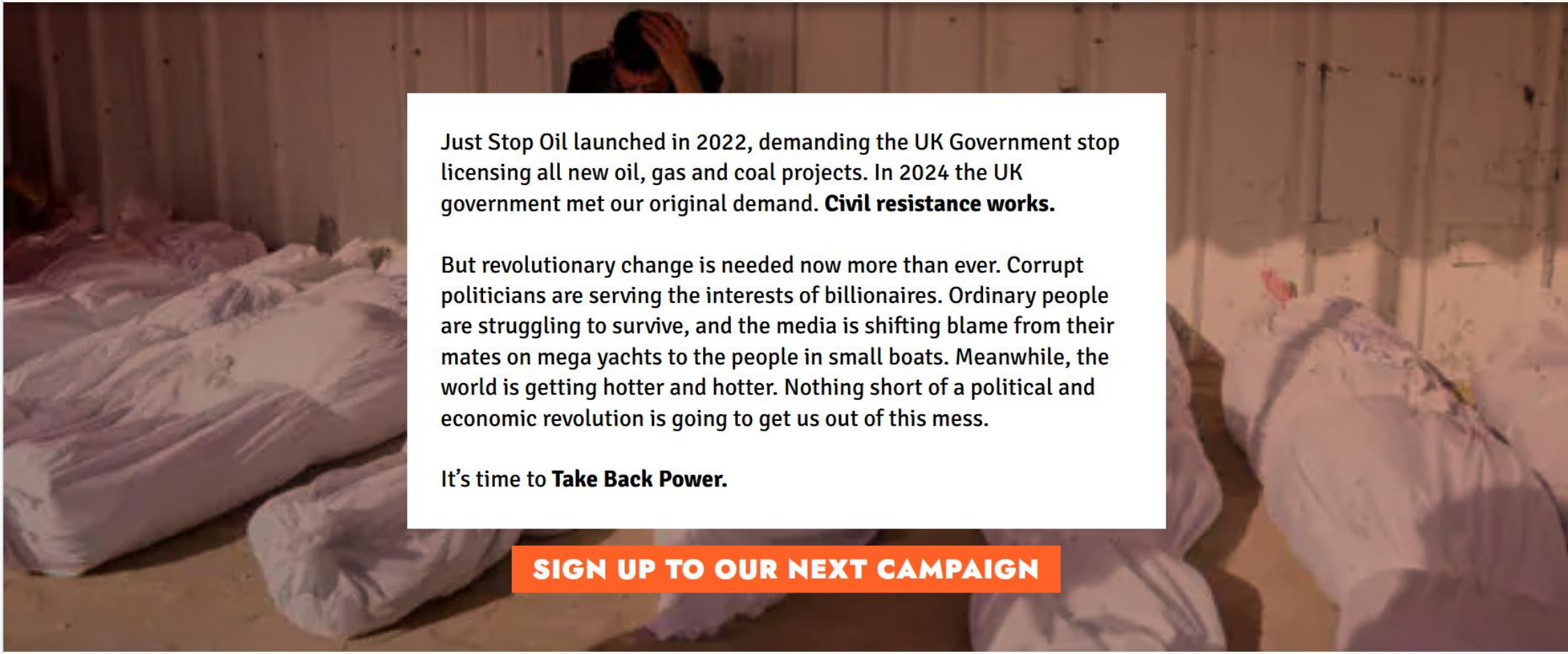
PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW18

This is the exhibit marked "AJW18" in the witness statement of Alexander James Wright.



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.**

SIGN UP TO OUR NEXT CAMPAIGN

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW19

This is the exhibit marked "AJW19" in the witness statement of Alexander James Wright.

just.stopoil and defendourjuries



973 92 47 48

just.stopoil 🚨 SLOW MARCHERS FOUND NOT GUILTY BY A JURY... more

17 April

17 April

just.stopoil



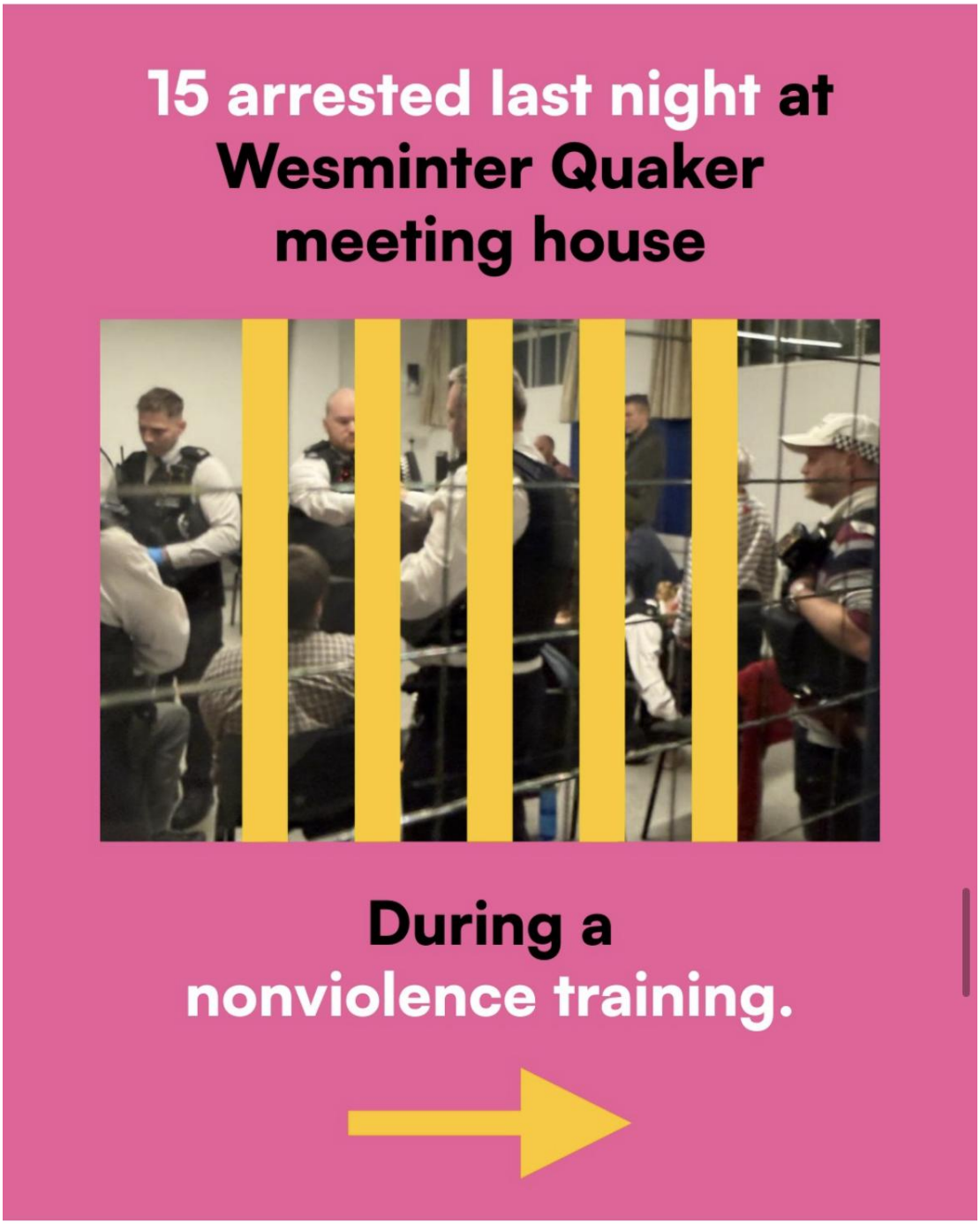
341 19 6 8

just.stopoil 🚨 BREAKING: JANE IS FREE!

Jane Touil, 60, has just been released from prison... more

7 April

takeback.power and 4 others



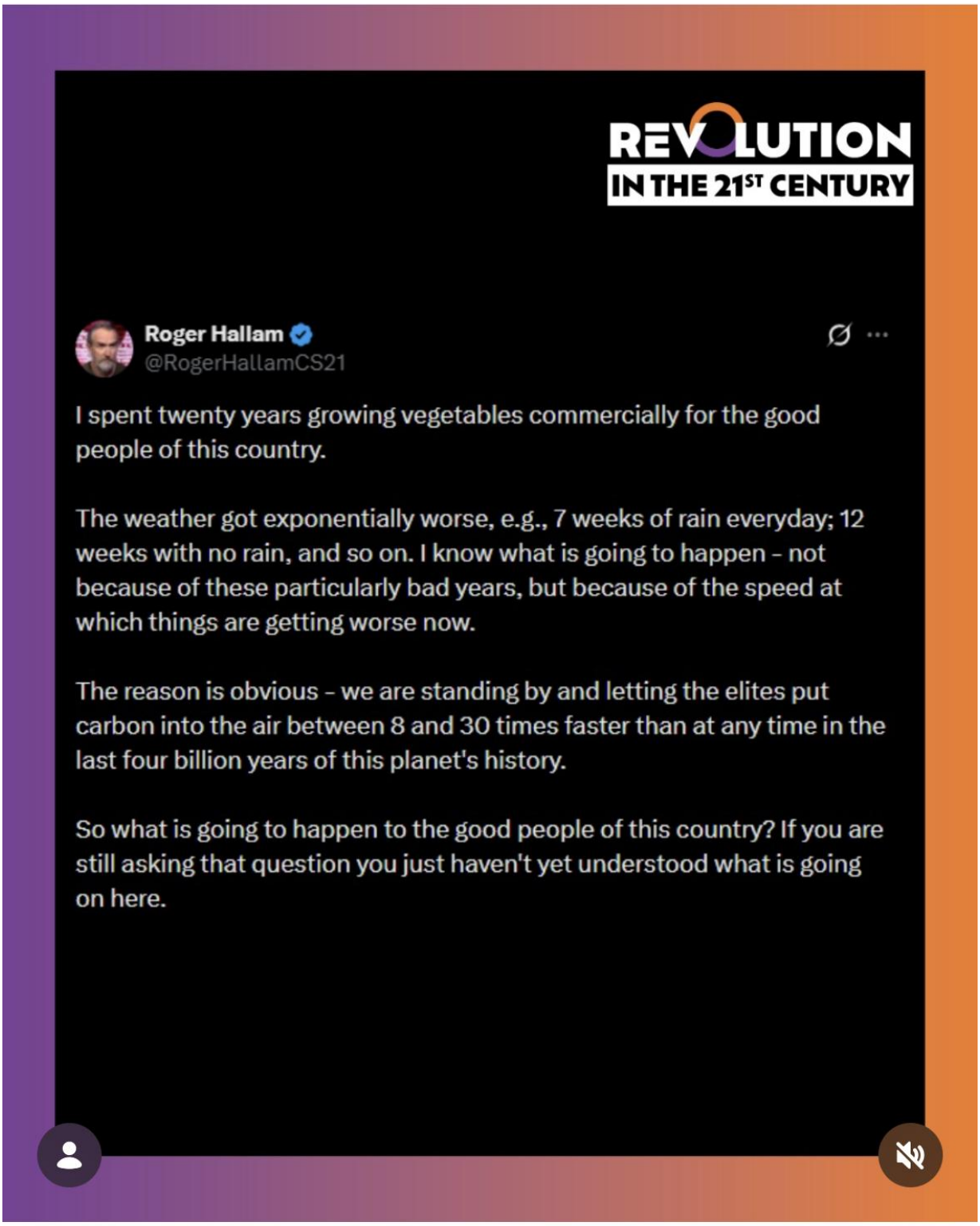
907 37 113 153

takeback.power Imagine being so deep in the pockets of CEOs and billionaires that you'd go to a Quaker Meeting House and arrest everyone at a nonviolence training.

@metpolice_uk really demonstrating the state's fear of peaceful resistance.

6 March

rogerhallamcs21 and 3 others
Wales, UK



298 18 28 31

rogerhallamcs21 With these numbers it's clear that revolution is inevitable. Sign up for it at rev21.earth.

3 March



69 3 2 3

takeback.power Another Just Stop Oil jury trial has just been adjourned to 2027.

Fact 1. All Section 7 jury trials bar one for nonviolent civil resistance have been adjourned in the 2 years since the Public Order Act came into law.

Fact 2. Lammy is planning to try and rush through scrapping jury trials.

There is no justice in our "Justice" Secretary.

23 February

Just Stop Oil
11.9K posts

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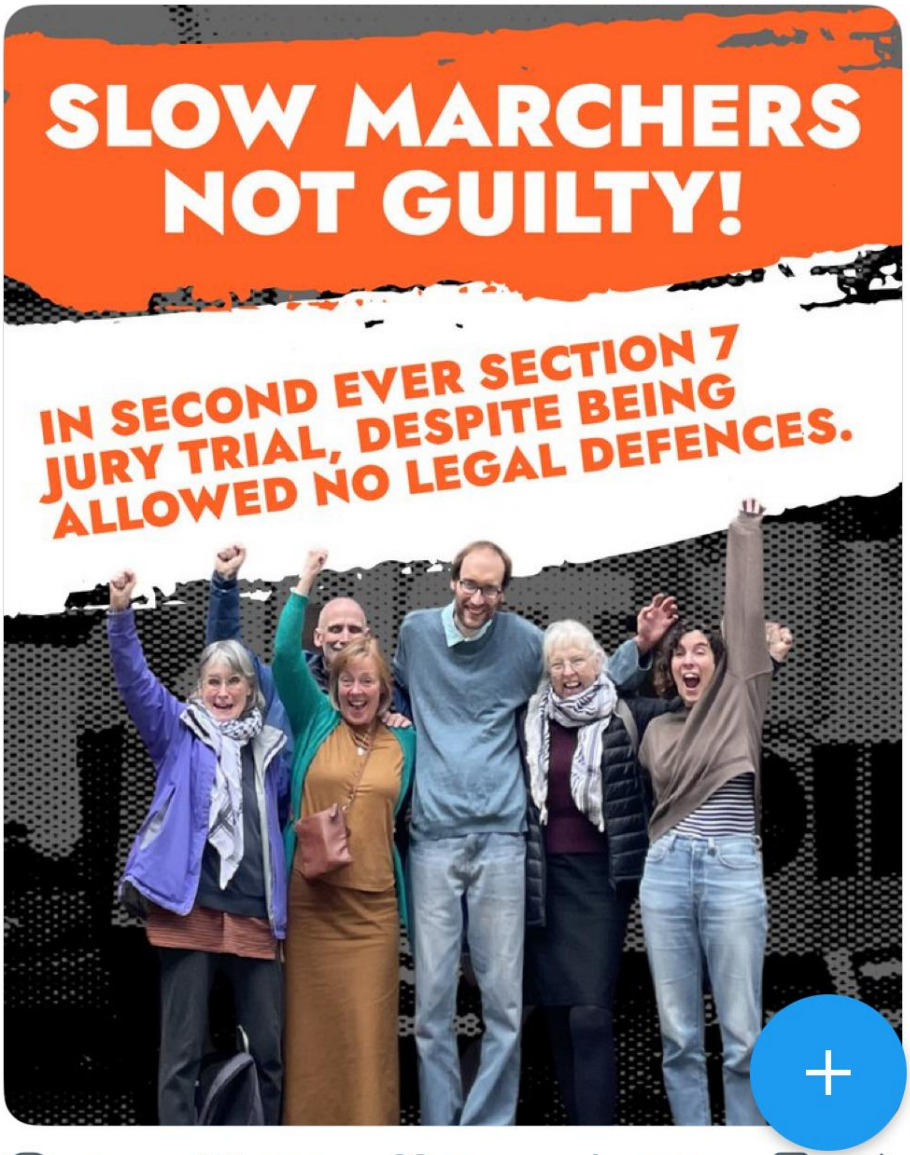
Just Stop Oil @JustSt... · 17/04/2026

🚨 SLOW MARCHERS FOUND NOT GUILTY BY A JURY

Hey @SuellaBraverman, turns out juries don't like when you invent anti-protest laws designed to imprison people for 12 months just for marching.

Six Just Stop Oil supporters were a Show more



42 568 1K 35K

Just Stop Oil
11.9K posts

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Just Stop Oil @JustSt... · 07/04/2026

🚨 BREAKING: JANE IS FREE!

Jane Touil, 60, has just been released from prison after serving 4 months of a 20 month sentence for climbing a gantry over the M25 in 2022 to demand an end to new oil and gas. She is partially sighted.

She will serve the rest of her sente Show more



21 105 294 5.5K

Just Stop Oil
11.9K posts

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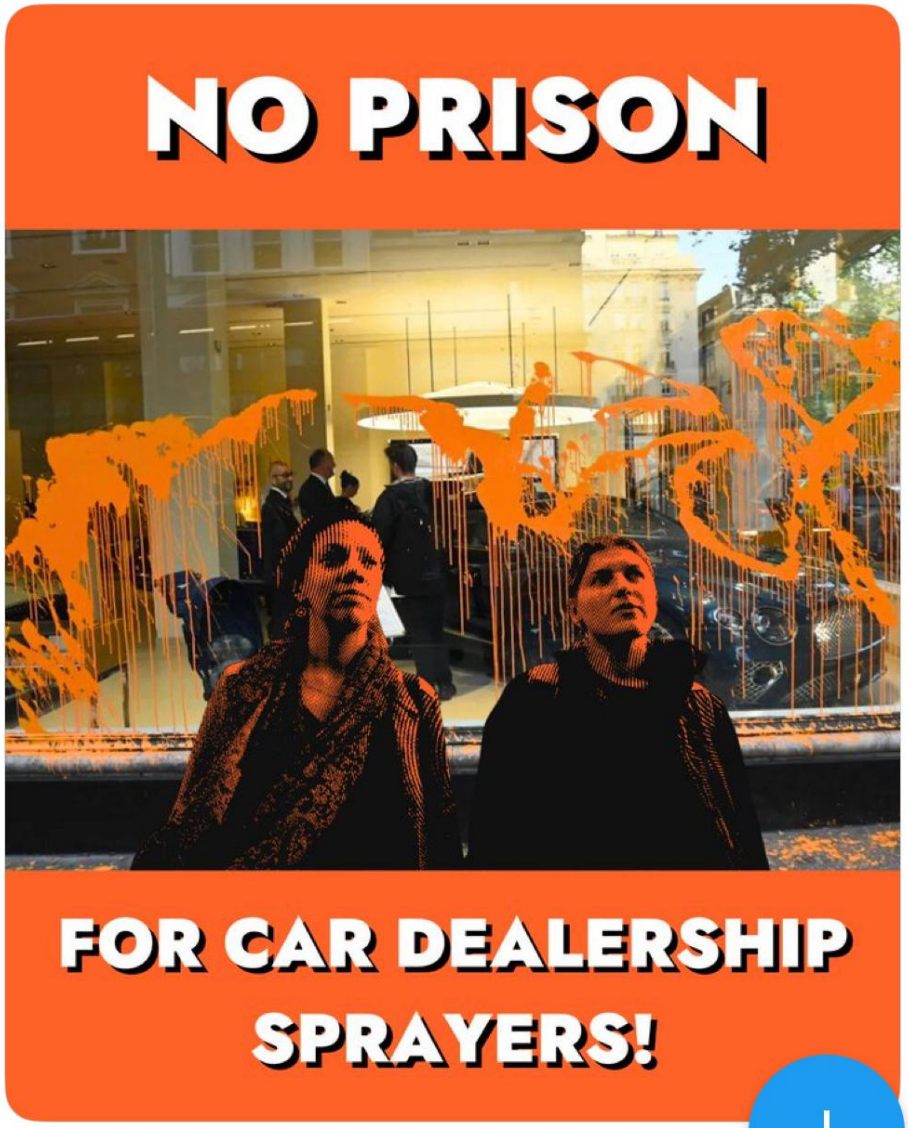
Just Stop Oil @JustSt... · 20/02/2026

🚨 BREAKING: NO PRISON FOR CAR DEALERSHIP SPRAYERS

In October 2022, Carmen and Emma sprayed orange paint over high end car dealerships including HR Owen, Jack Barclay and Ferrari Mayfair, demanding an end to new oil and gas licences Show more



13 10 24 4.1K

Just Stop Oil
17 Apr ·

🚨 SLOW MARCHERS FOUND NOT GUILTY BY A JURY... See more



Southwark Crown Court today, two and a half years after slow marching on Waterloo Bridge to demand an end to new oil and gas licensing.

On 8th November 2023, Sheila Shatford, Julia Mercer, David Kilroy, Geraldine James, Rosalind Bird and Gregory Sculthorpe were among approximately 50 supporters who joined a slow march around the IMAX roundabout before heading north over Waterloo Bridge. They were arrested and charged with Section 7 of the Public Order Act 2023: interference with key national infrastructure: an offence which was used for the first time only two days beforehand, and which carries a maximum penalty of 12 months imprisonment, an unlimited fine, or both.

The six appeared before Judge Hiddleston at Southwark Crown Court this week in a trial which had been restarted after one of the original jury fell ill. The jury delivered their

During the five day trial, the Judge denied the defendants all legal defences including reasonable excuse and necessity, and ruled that agreed facts on climate were "irrelevent". The defendants were, however, given around 20 minutes each to talk about their motivations for taking action.

The jury were asked to consider whether the defendents had caused a significant delay to other road users, and if so whether that was their intention or they were reckless as to whether that would have been the result.

The police produced a compilation of video evidence showing the march which demonstrated some traffic buildup, but no evidence of a normal traffic flow at that location. Laura Stockdale, acting for Greg Sculthorpe, questioned whether the jury could be sure that this buildup was more than would normally occur on a weekday in central London.

been less if the police had let the march continue to the other end of the Bridge and if they had not themselves closed the Southbound carriageway. DI Keven Pender for the Metropolitan Police responded that they could not be sure what the marchers were planning to do.

The defendants each emphasised their desire to draw attention to the climate crisis and the care and careful planning that was involved in undertaking a march. All denied that there was any intention to cause anything more than minor slowing of traffic.

In her defence evidence, Sheila Shatford spoke movingly of what inspired her to take action, including a childhood teacher whose family had been affected by the Aberfan disaster in which 116 children were killed. She said: "Only later did I understand that the slag heap belonged to the National Coal Board, and that warnings were given before the disaster, but

She went on to recount how she had learned about the climate emergency and said: "I realised that it's always the poorest and most vulnerable that are most affected and have the smallest voice. I read and found out the climate emergency was real - there is overwhelming evidence that it's happening now, and very soon we won't be able to stop it."

The 2023 Public Order Act was introduced specifically to target climate protest, and named groups such as Extinction Rebellion, Just Stop Oil and Insulate Britain as the reason for its introduction. Although hundreds of Just Stop Oil supporters have been charged with the Section 7 offence and are awaiting trial, as a result of the backlog in courts, this was only the second case to be heard since May 2024.

The first person to be convicted of the offence was Stephen Gingell who was jailed for 6 months after pleading guilty in December 2023.

61 comments 75 shares

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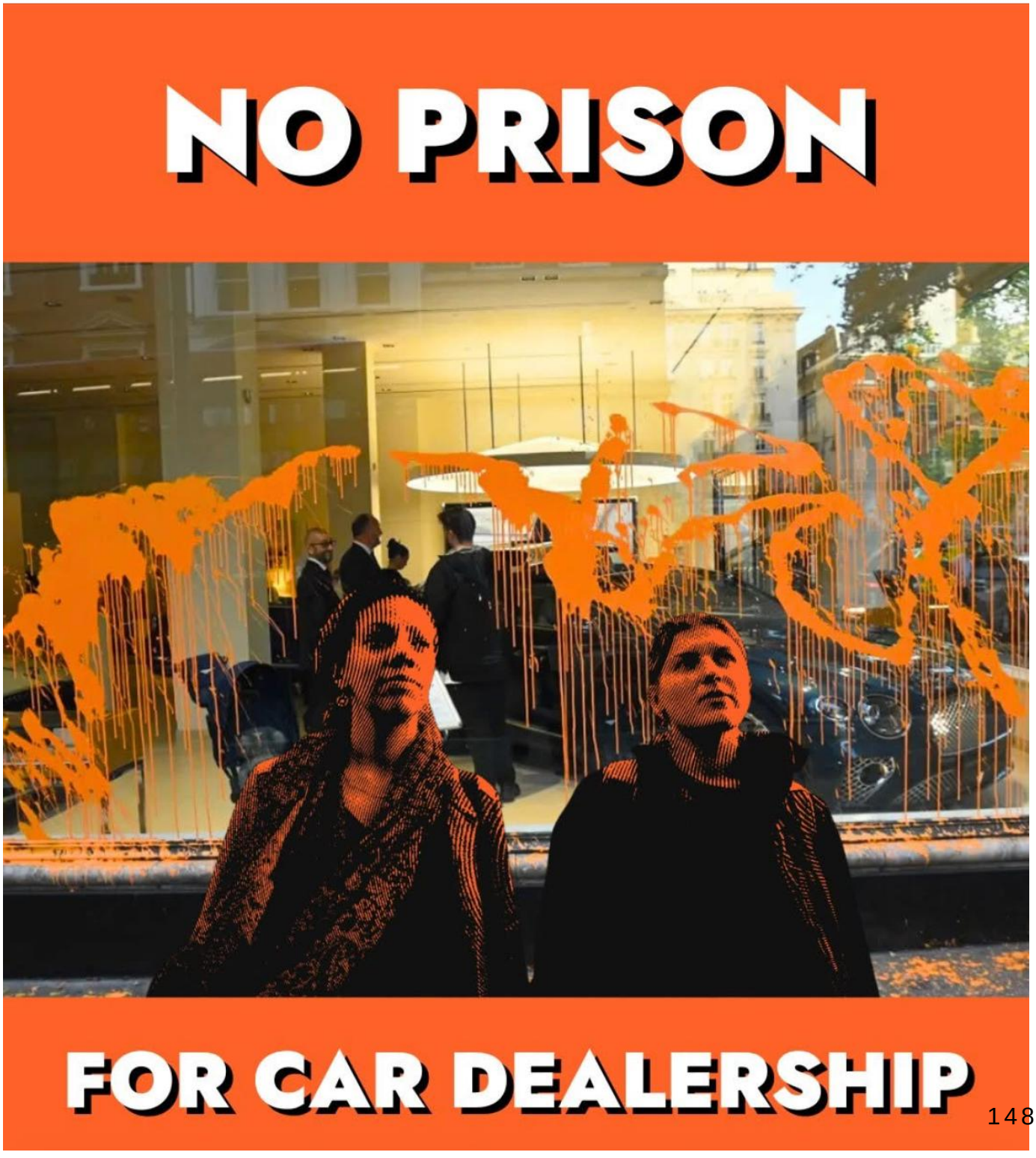
Just Stop Oil

All Photos Reels More

Just Stop Oil
20 Feb ·

🚨 BREAKING: NO PRISON FOR CAR DEALERSHIP SPRAYERS... See more



CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW20

This is the exhibit marked "AJW20" in the witness statement of Alexander James Wright.

Taking back power or taking the mickey? The activists ‘liberating’ food from big stores

A new UK civil resistance group has called for ‘mass shoplifting’ to focus attention on inequality, but recent stunts have led to arrests



Eve Middleton was sitting on a picnic blanket in a park, sharing out vegan biscuits with six fellow activists, when she saw a squad of police bearing down on them. About 30 officers, she said, surrounded the seven young people, and one officer told them: “Don’t run or you’ll be cuffed.”

Another officer focused on gathering evidence. “Whose Oreos are these?” they asked, seizing the biscuits.

“It was pretty farcical, but it’s still frightening when you see that amount of officers running towards you. It’s pretty scary,” said student Bridie Leggatt, another of the seven.

The seven activists had gathered for a “nonviolence training event” – meeting in the park to enjoy the sunny weather.

Leggatt, 22, and Middleton, 25, were among 13 people arrested last weekend in Salford and London as part of a national police crackdown on a new civil resistance group called Take Back Power.

A further 15 arrests had been made in March when police raided a “nonviolence training” event, this time at the Grade II-listed Quaker House in Westminster.

They were all held on suspicion of conspiracy to commit theft, police said, linked to Take Back Power’s campaign of “mass shoplifting” in supermarkets across Britain in a protest against inequality.

On TikTok, the group’s videos show activists of all ages “liberating” rice, pasta, beans, nappies, stock cubes and tinned fruit from supermarkets including Cornwall, London and Manchester.

They pile the goods into cardboard boxes branded with the message: “These things are going to those who need them.” The items are then distributed at local food banks – if they manage to get past security.

Even by today's standards of shoplifting, when supermarket thefts have reached record highs, the mass looting is quite brazen.

Steph Parker, an assistant chief constable at Greater Manchester police, said forces would take "robust action to disrupt this type of organised criminality and it will not be tolerated".

Middleton and her six comrades were held in custody for 24 hours before being released on Monday. For Middleton, like many of the activists, this is not her first encounter with the law.

Many of those involved with the group 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. Neither Middleton or Leggatt wanted to say how many times they had been arrested as they feared a telling off from their parents.

Take Back Power announced itself in December when activists threw custard and apple crumble at a case containing the crown jewels at the Tower of London.



Eight people were charged with criminal damage over the stunts, with four due to appear before Westminster magistrates court on Monday. The group said a total of 50 people had been arrested since December, with the majority detained while taking part in "nonviolence training" events.

On its website, activists are invited to join upcoming action in London "targeting the luxury lifestyle of the super-rich" by "occupying where they play and shop".

A spokesperson for Take Back Power, who would only give his name as James due to the risk of arrest, said the group planned further headline-grabbing stunts this year with the aim of focusing attention on Britain's deepening inequality.

James said the organisation, which wants to see higher taxes levied on the rich and a legally binding citizens' assembly, had no leader "as such". It has raised more than £65,000

in donations in the past four months, according to a fundraising page.

Another of those arrested last weekend, who would only give his name as Mark, said mass shoplifting would have "no real effect" on supermarkets who make billions of pounds in profit.

"Supermarkets are profiting off other people's misery and we can't put up with that," said Middleton, pointing out that Tesco's chief executive, Ken Murphy, was paid £9.2m last year, about 400 times that of the shop's typical worker.

What about the effect on low-paid staff? Will they not risk losing their jobs if mass shoplifting has an effect on company profits?

"It shouldn't be staff that get cut," said Mark, 44, who works in education. "What should get cut are the obscene profits and salaries of the chief executives."

The vegan picnic raided by police last weekend was in Salford's Peel Park – named after Sir Robert Peel, the founder of modern law enforcement whose philosophy of "policing by consent" is a guiding principle of forces today, recognising that those in uniform operate on the basis of public trust rather than fear or force.



Yet the arrests of activists at a training event – rather than for a specific act – appears to run counter to that principle, said Middleton.

Parliament's joint committee on human rights has condemned legislative changes in recent years that it said (pdf) have had "a chilling effect" on the right to protest in England and Wales.

Middleton said the arrests on suspicion of being involved in a conspiracy was part of a wider "repression" of civil resistance in Britain.

"Other groups were able to take part in training without everyone getting arrested," she said. "For doing not as much, the risk of prison is a lot higher."

James, the Take Back Power spokesperson, said the group planned to build up its action with the aim of pushing inequality to the top of the agenda by the next general election, which has to be held by August 2029.

Middleton believes the police crackdown is a sign that the authorities are scared.

“They can see that Take Back Power does speak to a lot of this country’s people [who are] fed up with inequality. They are scared of what it could become.”
■

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW21

This is the exhibit marked "AJW21" in the witness statement of Alexander James Wright.

Four taken into custard-y as Take Back Power ‘crumble and custard’ the Crown Jewels



Two supporters of Take Back Power have smothered dessert over the crown jewels. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen’s assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 09:50 this morning, two Take Back Power supporters covered the glass containing the crown jewels in custard and apple crumble. They then held a sign which read ‘DEMOCRACY HAS CRUMBLED- TAX THE RICH’. By around 10:30, the two action takers and two others had been taken into custard-y by police.

Today’s action comes as all donations to Take Back Power will be doubled until midnight on Sunday the 7th December! You can donate and have your donation doubled here. [2]

A Take Back Power spokesperson said:

"Since 2011, the poorest 10% of households have paid a combined tax rate of 44% on their income and wealth gains, while the richest paid 22%. Our political class, be it this government, Reform or Tory, serve the super-rich; they do not care about working people. That's why we must demand real democracy, with ordinary people at the heart of decision making, through a citizen-led assembly that has the power to tax the rich." [3]

One of those taking action today is Miriam Cranch, 21, a retail worker from Leeds, who said:

"Britain is broken because the super rich are pocketing billions, whilst working people struggle to get by."

"This wealth inequality is leading us towards civil unrest, and it doesn't have to be this way. Billionaires should not pay a lower tax rate on wealth they generate doing nothing, than those of us working jobs. It's time ordinary people get a say on how to tax wealth with a permanent House of the People."

Also taking action today is Zahra Ali, 19, a student from London, who said:

"Our country is crumbling before our eyes! We have homeless people dying on the very streets that King Charles passed on his way to the coronation, whilst there are more empty homes than unhoused people in this country."

"It's time the ultra rich pay their fair share. We demand a permanent House of the People. It's time to take back power, tax the rich and fix Britain! Join us at takebackpower.net."

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net.

ENDS

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW22

This is the exhibit marked "AJW22" in the witness statement of Alexander James Wright.

~~Wed, Jul 22, 2026, 8:00 pm~~ 8:00 pm	~~Welcome Event~~	~~London, E1~~ 5QJ	~~Register~~

Follow us on social media.

—

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, 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!**

—

Contact us
General: info@takebackpower.net
Press: press@takebackpower.net
Fundraising: giving@takebackpower.net

Get the newsletter

First name *

Email *

Postcode

Country

-

I agree to the privacy policy *

Register

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW23

This is the exhibit marked "AJW23" in the witness statement of Alexander James Wright.

What is Take Back Power and what does it want?



– 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.

+ What is Take Back Power's demand?

+ What is the House of the People?

+ What would the House of the People do?

+ Has an institution like this existed before?

+ Don't the super-rich already pay too much tax?

+ How rich are we talking about here?

+ How bad is inequality in the UK?

+ What sort of tax would you like to see?

+ Even if you tax the rich it won't be enough to fix Britain will it?

+ How would you spend the money raised?

+ Why does Take Back Power engage in disruptive direct action?

+ How is Take Back Power funded?

+ How can I get involved?

What is Take Back Power and what does it want?



+ What is Take Back Power?
+ What is Take Back Power's demand?
+ What is the House of the People?
+ What would the House of the People do?
+ Has an institution like this existed before?
+ Don't the super-rich already pay too much tax?
+ How rich are we talking about here?
+ How bad is inequality in the UK?
+ What sort of tax would you like to see?
+ Even if you tax the rich it won't be enough to fix Britain will it?
+ How would you spend the money raised?
– 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. You can read more about how this works here.

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW24

This is the exhibit marked "AJW24" in the witness statement of Alexander James Wright.

(https://takebackpower.net)

‘Inequality is shit’ — Take Back Power deliver crappy Christmas for the Ritz

December 3, 2025(https://takebackpower.net/2025/12/03/)



Three supporters of Take Back Power have delivered a pile of shit to the Ritz. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen’s assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 12:05 today, three Take Back Power supporters deposited a pile of manure below the Christmas tree at the iconic luxury hotel. The three were quickly removed from the lobby and then held signs outside the entrance which read: ‘INEQUALITY IS SHIT’ & ‘TAX THE RICH’.

A Take Back Power spokesperson said:

"The super-rich have more than doubled their wealth since the pandemic, while this Christmas, a third of UK children suffer and grow up in poverty. It's time ordinary people – those most affected by inequality, get a say in deciding how to tax wealth through the means of a legally binding citizen's assembly- a House of the People." [2][3]

One of those taking action today, Ellen Redwood-Brown, 23, an NHS worker, said:

"The billionaires, corporations, and corrupt politicians running Britain don't care about us. While working in the NHS I've seen people dying because they couldn't get appointments whilst doctors are working 15 hour shifts."

"The UK has 156 billionaires. We could take away 75% of that wealth to fix Britain and we'd still have 156 billionaires. We must let ordinary people decide how to tax the rich." [4]





Also taking action today is Tom Barber, 65, a former doctor, journalist and community worker from Nottingham, who said:

"Power is concentrated in the hands of a small group of obscenely wealthy and ruthless individuals. They are hell-bent on enriching themselves, forcing the gap between the haves and the have-nots ever wider."

"Everyday people must Take Back Power, compelling our government to create a permanent citizens' assembly- a House of the People. Only then can we start making decisions for everyone's benefit- taxing the rich, creating a fairer society and restoring our faith in our democracy."

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

(https://takebackpower.net)

Four taken into custard-y as Take Back Power ‘crumble and custard’ the Crown Jewels

December 6, 2025(https://takebackpower.net/2025/12/06/)



Two supporters of Take Back Power have smothered dessert over the crown jewels. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen’s assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 09:50 this morning, two Take Back Power supporters covered the glass containing the crown jewels in custard and apple crumble. They then held a sign which read ‘DEMOCRACY HAS CRUMBLED- TAX THE RICH’. By around 10:30, the two action takers and two others had been taken into custard-y by police.

Today's action comes as all donations to Take Back Power will be doubled until midnight on Sunday the 7th December! You can donate and have your donation doubled here (https://donorfed.org/project/take-back-power?utm_source=tbpnet&utm_medium=websitet&utm_content=tbphome&utm_term=doubletop) (https://takebackpower.net) [2]

A Take Back Power spokesperson said:

"Since 2011, the poorest 10% of households have paid a combined tax rate of 44% on their income and wealth gains, while the richest paid 22%. Our political class, be it this government, Reform or Tory, serve the super-rich; they do not care about working people. That's why we must demand real democracy, with ordinary people at the heart of decision making, through a citizen-led assembly that has the power to tax the rich." [3]

One of those taking action today is Miriam Cranch, 21, a retail worker from Leeds, who said:

"Britain is broken because the super rich are pocketing billions, whilst working people struggle to get by."

"This wealth inequality is leading us towards civil unrest, and it doesn't have to be this way. Billionaires should not pay a lower tax rate on wealth they generate doing nothing, than those of us working jobs. It's time ordinary people get a say on how to tax wealth with a permanent House of the People."

Also taking action today is Zahra Ali, 19, a student from London, who said:

"Our country is crumbling before our eyes! We have homeless people dying on the very streets that King Charles passed on his way to the coronation, whilst there are more empty homes than unhoused people in this country."

"It's time the ultra rich pay their fair share. We demand a permanent House of the People. It's time to take back power, tax the rich and fix Britain! Join us at takebackpower.net (https://takebackpower.net)."

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ENDS

(https://takebackpower.net)

Take Back Power supporters call on Starmer to cut the corruption and resign by ‘locking-on’ at Parliament

February 6, 2026(https://takebackpower.net/2026/02/06/)



Two young people have called on Keir Starmer to cut out corruption and resign by ‘locking-on’ outside Parliament. They are supporters of Take Back Power, a nonviolent civil-resistance group, demanding that the UK government establish a ‘House of the People’- a permanent citizen-led assembly with the power to tax extreme wealth. [1]

At 9am this morning, two young people carrying a giant Keir Starmer papier mache head locked themselves in front of Carriage Gate, blocking access to Parliament. They could be seen holding placards which read “Cut the Corruption”. By around 10am police arrived at the scene and had cut through the papier mache head.

A spokesperson for Take Back Power said:

"We're calling on Keir Starmer to resign. While Lord Mandelson is gone, the system that protected and empowered him remains. It's time to cut out the corruption at the heart of our democracy. While corporations and the super rich are splashing their cash to buy access to ministers and seats in the House of Lords, ordinary people are struggling to afford basic necessities."

"We need a radical overhaul so that democracy works for all of us, not just the privileged few. We have politicians in the pockets of billionaire pedophiles, they don't work for us. We need ordinary people in charge through a House of the People."

One of those taking action today is Alice Jones, 20, a student from Manchester, who said:

"It is absurd that we live in a country where 156 billionaires hoard wealth, splashing out on private jets, whilst ordinary people have to choose between heating their homes, or feeding their children; all while our country quickly descends into fascism."

"The politicians in our country are failing us. Ordinary people are being left to survive with the scraps: a crumbling NHS, extortionate food prices, and ever rising bills. The UK needs a permanent House of the People. It's time to take back power, tax the rich and fix Britain! Join us at takebackpower.net (https://takebackpower.net)."





(Left image credit to Jamie Lowe. Right image and main image credit to Will Colebourne.)

Also taking action is Bridie Leggatt, 22, who is also a student from Manchester, who said:

"Spiralling wealth inequality is leading us to societal collapse. Our country is the sixth richest nation and yet it is home to 4 million children living in poverty. Our political system doesn't function fairly. We need ordinary people in the decision making seats deciding how to fix this; not corrupt politicians in the pockets of the super rich."

“There IS a solution to inequality, but our government simply won’t do what’s necessary. We cannot let political parties use scapegoated minorities to distract us from what is needed: a tax on the super rich.”

(https://takebackpower.net/)





(Image credit to Will Colebourne.)

Today’s action comes just days after the MET police began criminal investigations into Peter Mandelson, Starmer’s former ambassador to the US, over allegations that he passed market-sensitive information to the pedophile financier Jeffrey Epstein.

New allegations from recently released Epstein files also allege that Peter Mandelson’s husband accepted money from Jeffrey Epstein after his prison sentence over child sexual offences. [2]

But the corruption doesn’t end there, recent research by the Guardian showed that almost a third (266 out of 800) members of the House of Lords have given donations to political parties, some 115 of them before they were given peerages. [3]

Recent media reports have revealed that Labour government ministers have met with the arms industry, banks and big oil hundreds of times, while half the cabinet have taken cash from pro-Israel lobbyists. The Party even offered sponsorship deals for £55,000 to allow businesses to host lunches for ministers at the Labour conference. [4][5][6]

Meanwhile, inequality is spiralling out of control. Student nurses say they are sleeping in their cars, going to food banks and relying on lecturers to buy them food, while nearly half of Brits would struggle to pay for basic necessities if they lost their jobs. Given this, it is not surprising that faith in political institutions has collapsed, with 87 per cent of Britons across all parties having either not very much trust in politicians or none at all. [7][8][9]

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen’s assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takepackpower.net).

ENDS

(https://takebackpower.net)

Police arrest 15 Take Back Power supporters at a nonviolence training event

March 5, 2026(https://takebackpower.net/2026/03/05/)



15 Take Back Power supporters were arrested during a nonviolence training this evening being held in the Westminster Quaker Meeting House. Take Back Power is a nonviolent campaign demanding a tax on extreme wealth, to be decided by a 'House of the People.' [1]

At around 18:35 a number of police officers forced entry into the Westminster Quakers meeting house. They proceeded to arrest 15 people on suspicion of conspiracy to commit theft. Two of those arrested were acting as legal observers. During the raid an ambulance had to be called as one person

suffered a panic attack after being arrested. Those arrested were sent to Brixton and Walworth police stations where one person was subsequently bailed. 14 remain in custody. [2]

(https://takebackpower.net)

A Take Back Power spokesperson said:

“The police arrested fifteen ordinary people in a place of worship for discussing nonviolent civil disobedience. This draconian overreach shows what the state is willing to do to protect corporate profits and billionaires, while ordinary people struggle to put food on the table.

The state is scared of civil disobedience because it works. But when the super-rich have captured our politics, nonviolent civil disobedience is the only choice we have to take back our power. Now more than ever, we need everyone to join us: sign up at takebackpower.net.”

In their statement, the MET police referenced last year’s unprecedented raid on Westminster Quakers and the arrests of Youth Demand supporters meeting about the genocide in Gaza, which drew widespread condemnation from faith groups. One of the people arrested this evening had also been previously arrested during last year’s raid on Westminster Quakers. [3]

ENDS

(https://takebackpower.net)

Take Back Power supporters redistribute food from supermarkets to those most in need

March 14, 2026(https://takebackpower.net/2026/03/14/)



Take Back Power supporters have been redistributing food from supermarkets to local foodbanks across the country this morning. Take Back Power is a nonviolent civil-resistance group, demanding that the UK government establish a ‘House of the People’- a permanent citizen-led assembly with the power to tax extreme wealth. [1]

From around 8:30 this morning, teams across four UK cities- Manchester, London, Exeter and Truro, entered supermarkets and began putting food and necessities into boxes emblazoned with ‘These things are going to those that need them’. The Take Back Power supporters left the shops without paying for the produce and then redistributed these items to local food-bank drop off points.

In Exeter, a team of five supporters took five boxes of produce from Morrison’s supermarket in Prince Charles Road, however were stopped by security who took away two of five boxes. The remaining three boxes were successfully

liberated and taken to a local food-bank drop off point.

From Take Back Power (https://takebackpower.net)

In London, on liberating boxes of food, two supporters set up a stall outside Sainsburys in the Lewisham centre, to give the food back to the local community. Security staff arrived by around 9:40 and police arrived onsite at around 9:50. No arrests have been made as of yet and the supporters left at around 10am.

In Manchester, three action takers filled boxes with food from Tesco, on Pars Wood Lane in Didsbury. All three left the store without incident and redistributed the food to a food-bank drop off point at a local Aldi.

In Truro, two supporters loaded boxes from the Sainsburys on Treyew Rd and left the produce at the foodbank drop-off point in the same store.

A spokesperson for Take Back Power said:

"It is sickening that 6.5 million people in the UK are forced to turn to food banks every year and a third of children under five are living in homes where there is insufficient access to nutritious food. This is because our country is in crisis, with billionaires hoarding wealth, whilst ordinary people suffer. We need to tax extreme wealth to fix Britain, and we need ordinary people to decide how."







(Credit for image on the left and far right to The Canary)

One of those taking action today is Eve Middleton 25, from Manchester, who said:

"I refuse to sit by while billionaires hoard wealth and capture our democracy. We can all see the impacts of inequality on our streets, in our schools and hospitals and in our own homes. Taxing the super rich is the first simple step to solving these crises. Yet our political system will not deliver a wealth tax, as it is rigged to

benefit parasitic billionaires instead of the masses. It's time for ordinary people to be put at the heart of decision making, through a House of the People with powers to tax the rich and fix Britain."
(https://takebackpower.net)



(Credit for image to The Canary)

Also taking action is Ruth Cook, 74, a company director from Somerset, who said:

"I'm taking this action and risking arrest because we have a terrible situation in this country. Families are struggling and children are going hungry, while the profits some companies make are obscene. The answer is to tax the super-rich. I'm taking this food and delivering it to a food bank collection point because we need to do something about this. We need to tax the super rich and give ordinary people a say in how our taxes are spent. Join us at takebackpower.net (https://takebackpower.net)."





Today's action comes in the wake of the raid of a Quakers meeting house and the arrest of 15 people during a nonviolence training last week. One other was arrested at their home on Thursday and the houses of seven supporters have been raided by police in connection with these actions so far. (https://takebackpower.net)

This occurs as the UK remains in crisis. Last year, 14 million people in the UK faced the prospect of going hungry due to a lack of money. Whilst in 2024, 6.5 million people turned to food banks. [2]

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Seven arrested at Nonviolence training event as Take Back Power supporters homes raided

April 19, 2026(https://takebackpower.net/2026/04/19/)



Seven people have been arrested at a nonviolence training event held in London. The training was held by Take Back Power, a nonviolent campaign demanding a tax on extreme wealth, to be decided by a 'House of the People.' [1]

At around 12:30 yesterday, dozens of officers raided Millman Street Community Centre in London. Officers arrived in three vans, arresting six people under suspicion of 'conspiracy to commit theft.' One of those arrested was an undercover Daily Mail journalist.

At around 15:20 on Saturday the home of Take Back Power supporter was also raided. The supporter wasn't home and on learning there was a warrant for their arrest they handed themselves in. The police subsequently raided their home for a second time at around 2am this morning.

This weekend's raids occur as Take Back Power supporters joined a counter demonstration in Manchester yesterday, opposing Britain First, a far-right demonstration which was marching in the city. Groups opposing fascist demonstrators were kettled, beaten with trunchons and pepper-sprayed by police.

A Take Back Power spokesperson said:

"Once again the police are raiding homes and community centres, arresting people for simply learning about nonviolence. Meanwhile, police protect fascists marching in Manchester and kettle and beat counter-protestors instead. Such is the state of civil liberties in the UK in 2026. The government and police care more about protecting the interests of corporations and billionaires than protecting the people of this country. We've got to make politics work for ordinary people. We need a House of the People with powers to tax the billionaires destroying this country. If you want to help us make it happen sign up at takebackpower.net (https://takebackpower.net)."





On Saturday, police also attended and shut down a nonviolence training being held in Falmouth, no arrests were made, however the event was cancelled.

Today's raids continue the escalating repression being imposed on nonviolent campaigns. Police have so far shut down four nonviolence trainings held by Take Back Power, in some instances raiding places of worship.

These raids echo the widely unpopular and unprecedented raid in 2025 on Westminster Quakers where Youth Demand supporters were meeting to discuss the genocide in Gaza, which drew widespread condemnation from faith groups. [2]

ENDS

(https://takebackpower.net)

“Nigel for Sale”- Take Back Power takes action at Sotheby’s

April 27, 2026(https://takebackpower.net/2026/04/27/)



Two Take Back Power supporters have taken action at Sotheby’s auction house. Take Back Power is a nonviolent campaign demanding a tax on extreme wealth, to be decided by a ‘House of the People.’ [1]

At around 11:15 this morning, two Take Back Power supporters covered a painting at Sotheby’s Orientalist art pre-auction exhibition, with a picture of Nigel Farage’s face. The image read *“Nigel for sale: £100,000- bought by Sotheby’s”*. The painting covered is King Wilhelm I’s Arabian Stallion ‘Tursi’ by Friedrich Nerly, which is expected to sell for between £80,000- £120,000.

By around 11:35 the action takers had been removed from the building by security, however police didn’t arrive on the scene. At around mid-day, the action takers attempted to hand themselves in at Charing Cross police station. Thus far, no arrests have been made.

Sotheby's describes itself as *the 'world's premier destination for art and luxury'.* Best known for its fine art auctions, it also has a luxury real estate company — Sotheby's realty which has donated £100,000 to Reform. [2] (https://takebackpower.net)

A Take Back Power spokesperson said:

"Reform claims to be on the side of working people. If that were true, why would the 'world's premier destination for art and luxury', be giving them a donation of £100,000 in exchange for yet more tax breaks on the super rich if they get into power?"

"Reform is another party of the same corrupt corporations and super-rich who are destroying our country, putting the burden of fixing Britain onto working people. In order to fix Britain we need a mass redistribution of wealth and power away from the 1%, back to working people. Help us fix Britain at takebackpower.net (https://takebackpower.net)."





One of those taking action today is Elvis, a delivery driver from Bolton, who said:

"I'm taking action with Take Back Power in order to highlight corruption and inequality in the UK. Sotheby's have donated 100,000 to Reform plc, in exchange for more tax breaks for the super wealthy if they get elected."

"Meanwhile millions of families still struggle to put food on the table every single day. We can make a change if we all come together and build a system that's fairer and more representative of the British people. To find out more go to takebackpower.net (https://takebackpower.net)."

Also taking action today is Jimmy, 74, a retired NGO worker, from London who said:

"There was a time when the super-rich would be taxed at a much higher rate than ordinary working people, and we had a functioning health system and affordable housing. Nowadays corporations and billionaires pay next to no tax through using loopholes and offshore accounts."

“Reform wants to give even more tax breaks to the super wealthy who are already breaking Britain. We need ordinary people at the heart of deciding how to tax extreme wealth to begin fixing Britain. This is why we are calling for a permanent citizen’s assembly, with the power to tax extreme wealth- a ***House of the People****.”*

Reform is backed primarily by the super-rich and corporations. This includes donations from crypto-billionaire Christopher Harborne, Claudia Harmsworth, wife of the owner of the Daily Mail- Lord Rothermere, and London’s leading luxury interior designers- Interior Architecture Landscape. [2]

We need to Take Back our Power from the super-rich, which is why Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen’s assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Take Back Power ‘take over’ the playgrounds of the super-rich

April 30, 2026(https://takebackpower.net/2026/04/30/)



Take Back Power supporters have been ‘taking over’ the playgrounds of the super-rich this morning. Take Back Power is a nonviolent campaign, demanding a tax on extreme wealth, to be decided by a ‘House of the People.’ [1]

At around 10 this morning, 22 Take Back Power supporters occupied a Ferrari dealership in Berkeley Square, they could be heard chanting “WE DEMAND EQUALITY!” and “THE BILLIONAIRES HAVE GOT TO GO!”. By around 10:30 the group left the store.

At around 11:30, the group reconvened at Burlington Arcade- the world’s first modern shopping mall, which positions itself as an ‘elegant and exclusive upmarket shopping venue’. The group could be seen holding signs which read “HOUSE OF THE PEOPLE” and “4 MILLION KIDS IN POVERTY”, which were quickly seized by door staff.

By around 12:20, the group had moved on to the food hall at the luxury department store, Harrod's. Security was much more reactive, dragging Take Back Power supporters from the building.

(https://takebackpower.net)

A Take Back Power spokesperson said:

"This country is in crisis and everyone knows it! The people to blame are the corporations and super-rich who are extracting every last penny from working people, and then using their ownership of the media to distract people into blaming the poor and migrants. Nothing short of a massive transfer of wealth and power away from the 1% and back to working people can hope to fix Britain. Join us at takebackpower.net (https://takebackpower.net)."





One of those taking action today is Robert Pembroke, 43, a builder and dad from Devon, who said:

It's time ordinary people take back our power from the super-rich. Inequality is spiralling out of control, 50 families in the UK hold more wealth than 50% of the country. Around the world, it's even worse with eight men holding more wealth than 50% of the world's population!"

"It is obscene to allow this, people are dying. We need ordinary people, taking part in a permanent citizens' assembly- a ***House of the People*** *deciding how to tackle this. To find out more go to takebackpower.net (https://takebackpower.net)."*





Also taking action today is Ana Heyatawin, 63, a grandmother from Somerset, who said:

"Inequality, which is being imposed on ordinary people by big business, billionaires and the politicians who work for them, is killing people right now. More than a third of people in the UK now don't earn enough to buy life's essentials."

*"We need ordinary people at the heart of deciding how to tax extreme wealth to begin fixing this mess. This is why we are calling for a permanent citizen's assembly, with the power to tax extreme wealth- a **House of the People**."*

It's time working people take back our power from the super-rich. This is why Take Back Power is demanding that the UK government establish a permanent **House of the People—** a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Take Back Power supporters redistribute essential items whilst occupying high-end stores and hotels

May 1, 2026(https://takebackpower.net/2026/05/01/)



Take Back Power supporters have been occupying the playgrounds of the wealthy this morning, and have liberated items from a superstore to redistribute them back to the communities that need them. Take Back Power is a nonviolent campaign, demanding a tax on extreme wealth, to be decided by a **'House of the People.'** [1]

At around 9 this morning, three Take Back Power supporters entered the Tesco Extra on Acre Lane in Brixton, and took essential items from the shelves and left without paying. The action takers then donated the items at a local food-bank

drop-off point. At around 10am, all three attempted to hand themselves in at Brixton Police Station. So far none have been arrested.

At 11:45, around a further 18 Take Back Power supporters occupied the luxury department store Liberty, on Regent Street in London. They could be seen holding signs which read '3 MILLION HOUSEHOLDS SKIPPING MEALS' and 'TAX THE SUPER-RICH NOW.'

At around 1pm, this group then reconvened, disrupting access to the luxury hotel, Claridges. The group could be heard chanting "WE DEMAND EQUALITY!' and 'HOW DO WE TAX THE SUPER RICH?- A HOUSE OF THE PEOPLE!' as security attempted to move the supporters away from the door.

A Take Back Power spokesperson said:

*"Take Back Power is calling for an emergency '**House of the People**' to deal with the cost of living crisis. When politicians are too busy lining their pockets to fix our problems, we need the people most impacted to have a seat at the table. A **House of the People** selected by democratic lottery, like a jury, is a no-brainer solution to cut out the corruption and decide how to redistribute wealth."*





One of those taking action redistributing food today is Moshe Dixon, 25, from Dundee said:

"My mother came from poverty and fought tooth and nail to give me a better future. Like so many mothers she was promised that hard work would be rewarded, yet we are living in a country where so many families can't make ends meet despite working multiple jobs."

"6.5 million people had to turn to foodbanks in 2024. Meanwhile the CEO of Tesco is taking home 430 times the pay of the average Tesco employee, and the rich are paying a smaller share of tax than working people. We need an assembly of ordinary people coming together to decide how to tax extreme wealth in order to fix our broken country. Join us at takebackpower.net (https://takebackpower.net)."



(https://takebackpower.net)



Also taking action today occupying high-end stores and hotels, is Hannah McDonald, 20, a student from Liverpool, who said:

"Fourteen million people last year were faced with the prospect of going hungry, in this, the 6th richest nation on earth! Now we have a cost of living tsunami on the way and the government is nowhere to be seen."

"This is broken Britain. We need a ***House of the People****— an assembly with real power, where ordinary mums, nurses, posties & cleaners, get a real say in how to take back our power from the super rich, and redistribute that wealth and power back to working people."*

Today's actions come as the UK braces for food shortages and soaring prices as a result of the war in Iran, as rising fuel, fertiliser and commodity prices begin to feed into business costs. [2]

It's time we take on the super-rich who are profiteering from a world in crisis. This is why Take Back Power is demanding that the UK government establish an emergency **House of the People—** a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW25

This is the exhibit marked "AJW25" in the witness statement of Alexander James Wright.

Look what you made me do.



Two young people received suspended sentences today for spray-painting two private jets at Stansted Airport in June 2024 to demand the UK government negotiate a treaty to phase out oil and gas by 2030. [1]

They were found guilty of criminal damage at Chelmsford Crown Court in September. Jennifer Kowalski, 29, from Dumbarton recieved a 5 month custodial sentence suspended for 12 month, Cole Macdonald, 23, from Brighton was handed a six week custodial sentence suspended for 8 months plus 20 days rehabilitative activity. The two had cut through the wire perimeter fence at Stansted and sprayed paint from a fire extinguisher onto two private jets parked at Stansted Airport, just hours after Taylor Swift's plane had landed. [2]

At trial, the prosecution claimed the planes required extensive professional cleaning costing about £12,000. Judge Mill ruled the damage too serious for the defendants to rely on their rights to free expression and assembly under Articles 10 and 11 of the European Convention on Human Rights. The jury was therefore not allowed to consider whether restricting those rights was a proportionate response to the alleged damage. [3]

After their arrest both were held for 11 days on remand, until released on bail. Cole then spent 39 weeks on curfewed tag (this equals a four month custodial sentences) While tagged Cole was arrested five times for breach of bail, approximately once every two months. Once she was being held in police custody, another time she was in hospital seeking treatment for back pain after informing the monitoring service. None of the five arrested resulted in breaching bail being proven.

Before sentencing Jennifer Kowalski, 29, a former sustainability manager from Dumbarton, said:

"Whilst Taylor and her fans have been celebrating her eras, we have entered a new one – the era of global boiling. This is an era that will not end with a rebrand; it will end all others. As a former Swiftie, I know what Taylor stands to lose, because there is no folklore without human culture, no music on a dead planet.

"The court system can take our freedom, our autonomy, our dignity, and deny us basic rights. But they can never take my convictions, to fight for a future for us all. Whatever happens in a court room, that is who I am today, and they can never change that."

A Just Stop Oil spokesperson said

This trial, the saga of mismanaged draconian bail conditions and the sentences demonstrates, again, the establishment will protect the wealthy and privileged while punishing those seeking to protect us and defend our freedoms and natural justice.

In just seven months of 2022, Taylor Swift's private jet logged 170 flights – 15.9 full days in the air, averaging 80 minutes and 139 miles per trip. Yard, the sustainability marketing firm that compiled the data, estimated her total carbon emissions at 8,293.54 tonnes of CO_2, more than 1,100 times that of an ordinary person over an entire year. [4]

A study published in Nature and reported by National Geographic found that private aviation generated at least 15.6 million tonnes of CO_2 in 2023, with an average of 3.6 tonnes emitted per flight. Almost half of all private-jet journeys were under 500 kilometres,

and around one in five covered less than 200 kilometres, distances that could often be travelled by rail or road. The researchers noted that some aircraft models can emit more carbon in a single hour than an average person produces in an entire year. [5] [6]

The music industry, and even artists of Taylor Swift's stature, are not shielded from the accelerating climate collapse. In November 2023, 23-year-old Ana Clara Benevides collapsed and later died from heat exhaustion while attending Swift's concert in Rio de Janeiro during a record-breaking heatwave that pushed temperatures above 40°C. [7]

In recent months, the musician Steve Miller cancelled his entire North American tour citing the growing threat of extreme weather, describing the decision as unavoidable in light of intensifying heat, floods and wildfires. Artists and organisers are already facing rising costs, cancellations and safety risks as performances are disrupted by record temperatures and severe storms. Extreme weather, driven by fossil fuel combustion, is already endangering lives and reshaping the conditions in which global entertainment operates. [8]

ENDS

CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW26

This is the exhibit marked "AJW26" in the witness statement of Alexander James Wright.

FØSSIL FREE LONDON



Fossil Free London is 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. We advocate for a rapid and just transition towards a sustainable and equitable society.

In London? **Sign up to a welcome talk.**

Or join our **mailing list** and follow us on social media.

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

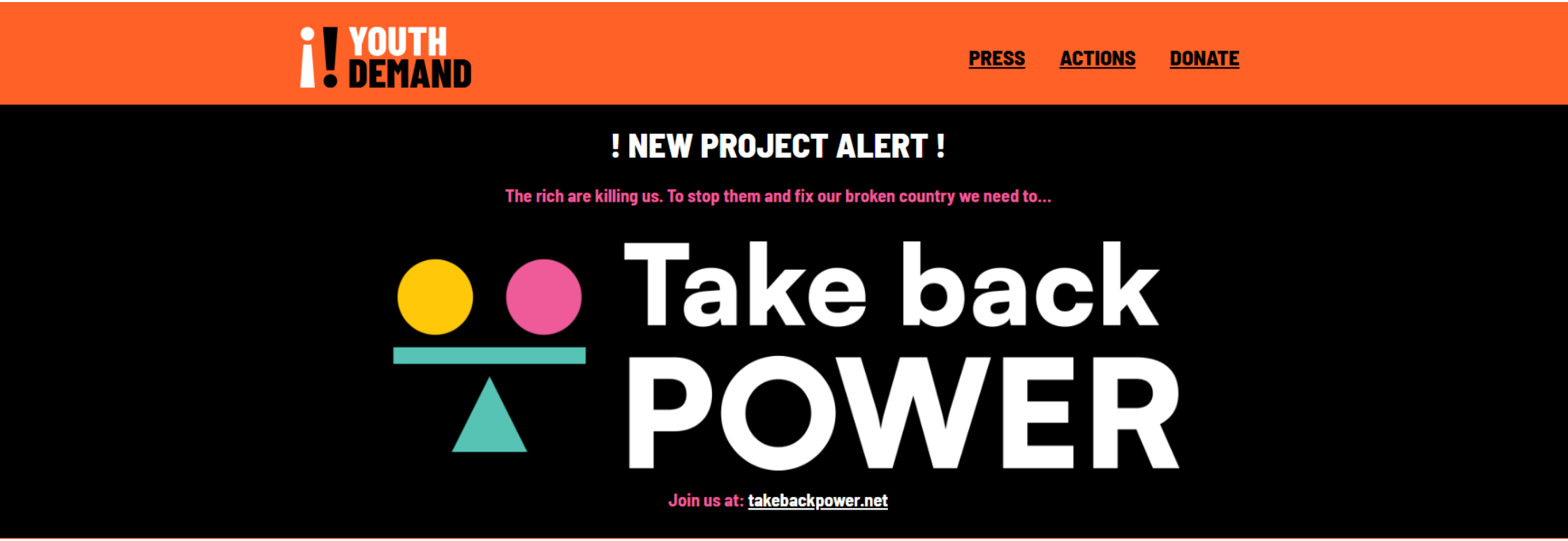
PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW27

This is the exhibit marked "AJW27" in the witness statement of Alexander James Wright.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CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW28

This is the exhibit marked "AJW28" in the witness statement of Alexander James Wright.

Two Just Stop Oil supporters found guilty for Heathrow paint spraying following retrial

by The Canary — 14 May 2026 in News, UK Reading Time: 4 mins read

202 10 AA 0

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Two Just Stop Oil supporters who sprayed Heathrow departure boards with orange paint during the Oil Kills international uprising to end fossil fuels in July 2024 have been found guilty in a retrial after the jury in an earlier trial failed to reach a majority decision.

Phoebe Plummer and Jane Touil were appearing before Judge Duncan at Isleworth Crown Court for the second time on a charge of criminal damage over £5,000 for their action on 30 July 2024 to demand a fossil fuel treaty to end oil and gas by 2030.

The jury took four-and-a-half hours to reach a majority verdict of 10-2. Following the verdict, Touil said:

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> *Since I took action, global fossil fuel use and emissions have continued to rise. More than ever, we need a global fossil fuel treaty to help governments rapidly phase out fossil fuels.*
>
> *What we do at this moment in history matters. But there is a difference between laws and morality. The courts apply the law made by powerful people. Morals come from within. It is our morals that give us our conscience. I have always tried to live according to my conscience.*

Plummer said:

> *The climate crisis is the greatest injustice that humanity has ever faced. We should all consider what to do at this time. No individual caused this crisis and no one is solely responsible for stopping it. But we can choose what we do to alleviate suffering.*
>
> *I feel compelled to act to be a responsible citizen, a loving aunt and a good person. It compels me to hope for a better future and one where my nephew grows up.*
>
> *I didn't think the action would change government policy. But non violent civil resistance is a necessary part of tackling the climate crisis and I'm grateful and proud to have been part of that.*

Plummer was remanded for 58 days and Touil for 14 days following the 2024 action in which the pair used fire extinguishers to spray diluted water-based paint in Heathrow Terminal 5 including at the departure boards. The Crown alleged that the action caused £8,000 worth of damages and that three of the display screens needed to be replaced.

Judge ruled out various defences for Heathrow action

At trial, Judge Duncan ruled out several legal defences for the action including those of 'reasonable excuse' under Articles 10 and 11 of the ECHR, 'necessity' and 'self defence' on the grounds that the threat from climate change was not proximate enough and the actions too far removed from the threat.

The defendants were allowed to argue belief in consent: that they honestly believed the owners of Heathrow would have consented to the damage if they knew of its circumstances. However, evidence of the relevant circumstances was to be limited to the fact that it was a climate protest with all evidence about the scale and urgency of the climate crisis ruled 'irrelevant and therefore inadmissible'.

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In giving evidence, Touil said:

> *I genuinely and sincerely believed that if the shareholders [of Heathrow] had a full understanding of the situation we are in they would have given their consent to our action.*
>
> *Most people believe there is something that is wrong with climate but not many people have access to the full situation because the fossil fuel industry has used their immense wealth to ensure that governments do not act and it is not reported in the mainstream media.*
>
> *So I don't know if shareholders have a full understanding, but I know that if they did, they would be doing all in their power to stop fossil fuels because there will be no business as usual, no functioning society, half the population could be wiped out along with 50% of global GDP. I think shareholders want to protect their investment but they also want a future for their kids.*

In her evidence Plummer said:

> *I want to make it very clear that this was not a protest against Heathrow, or anyone flying through Heathrow that day. It's true that the aviation industry is especially harmful to the climate in terms of emissions, though it is a small number of frequent fliers and private jet users who cause the vast majority of this harm, not families who save up for a holiday once a year.*
>
> *But this wasn't about getting people to stop flying. I made this individual change to live in line with my values, but honestly I know that it's pretty inconsequential. Even if we all woke up tomorrow and stopped flying and went vegan, it would be like mopping up a spill from an overflowing bath whilst leaving the tap on.*
>
> *All individual changes are like this when we are facing a systemic issue. If fossil fuels are extracted from the ground, then they will all be burnt, even if it's not on a flight that you're on. We need*

> *systemic change, that has always been Just Stop Oil's demand.*
>
> *My intention was not to cause damage. My intention was to take part in an act of nonviolent civil resistance, raising a serious alarm bell to the catastrophic future in store for us if we persist in our addiction to fossil fuels.*

Featured image via Just Stop Oil

Tags: climate crisis fossil fuels Just Stop Oil protest

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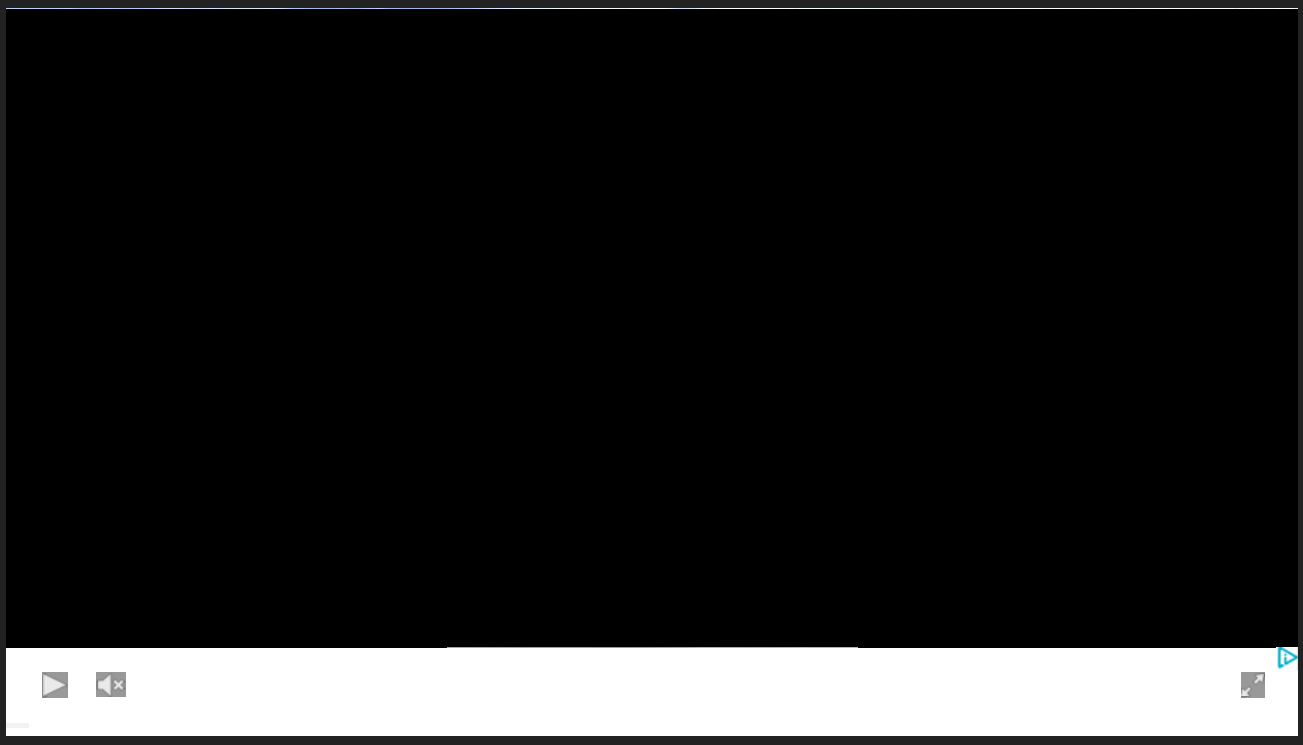
Just Stop Oil activists who sprayed Stonehenge with orange powder cleared of criminal damage

They cited human rights law in their defence

Rod Minchin
Friday 31 October 2025 17:12 GMT



Prosecutors release videos played in trial of Just Stop Oil activists accused of damaging Stonehenge

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Three Just Stop Oil activists who took part in a protest in which Stonehenge was sprayed with orange powder have been found not guilty of criminal damage and causing a public nuisance.

It follows a trial at Salisbury Crown Court where they cited human rights law in their defence.

Then-Oxford University student Niamh Lynch, 23, and Rajan Naidu, 74, had been accused of using two colour blasters filled with cornflour, talc and an orange dye to spray the monument.

Salisbury Crown Court was told the pair – along with a third activist, Luke Watson, 36 – targeted Stonehenge as part of an ongoing fossil fuel protest by the Just Stop Oil group the day before the 2024 summer solstice.

About 15,000 people were due to gather and celebrate at the monument.

Naidu and Lynch had crossed the boundary ropes and trespassed into the area around the monument before launching the attack.



Just Stop Oil protesters sit down after an orange substance was sprayed on Stonehenge *(PA Media)*

Watson had bought the equipment used in the attack and had driven his co-accused to Stonehenge that morning.

Prosecutors alleged the protest had been “carefully planned” and was filmed by other Just Stop Oil supporters with footage released publicly afterwards.

Simon Jones, prosecuting, said: “Putting it simply, we say they were all in it together.

“The prosecution say that this is an act of blatant and clear vandalism. The intention is undoubtedly to make a statement.”

After the attack, Naidu and Lynch, who were both wearing white Just Stop Oil T-shirts, sat down in silence in front of the stones until they were arrested.

The court heard the stones were promptly cleaned. The costs of removing the powder totalled £620.

Mr Jones added: “Stonehenge is arguably the best recognised and architecturally sophisticated prehistoric stone circle in the world, built around 5,000 years ago.

“The site in Wiltshire is visited by members of the public from all over the world, providing both an education and spiritual experience.

“The stones are a protected ancient monument.”





Judge Paul Dugdale told the jury in his legal directions they had to assess where the "balance lies" in the case and whether a conviction would be a "proportionate interference" with the defendants' rights.

RECOMMENDED

- Footage shows moment Just Stop Oil protesters spray orange paint on Stonehenge, court hears
- Just Stop Oil to end disruptive protests with final demonstration date announced
- Two deny charges over Just Stop Oil protest at Stonehenge
- Two people charged by police after orange paint was thrown at Stonehenge in Just Stop Oil protest

"In any society there will be those whose opinions we agree with and those whose opinions we disagree," he said.

"The essence of a free society and freedom of speech is that everyone's entitled to express their opinion even when we disagree with what they say.

"If individuals disagree with what our government is doing on certain matters, they are entitled to protest about the government's actions or inactions.

"All of this is the essence of our free society. It's how our society has developed over the centuries, and the reality is we are very fortunate to live in a free society.

"There are times when protecting the right to freedom of speech and freedom to protest can mean that activity that would otherwise be unlawful would be regarded as lawful by the court to protect those rights."

The jury found Naidu, of Gosford Street, Birmingham; Lynch, of Norfolk Road, Turvey, Bedford; and Watson, of The Street, Manuden, Essex, each not guilty of the two charges after deliberating for six hours.

More about: Stonehenge Just Stop Oil Salisbury Crown Court Human rights law Activists

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Three Just Stop Oil supporters walk free after trial for M25 gantry action

Court & Prison, Press / September 11, 2025

Three Just Stop Oil supporters were found not guilty of public nuisance at Guildford Crown Court today, after peacefully climbing gantries on the M25 in 2022, to demand an end to new fossil fuel projects.[1]

Sam Holland, Rachel Payne and Isabel Rock took action on the M25 on 9th November 2022. They were

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During the trial the prosecution emphasised that this was a planned and coordinated action that resulted in significant delays to the travelling public, that all three defendants were trespassing in a place that was forbidden to the public and that they had taken considerable risks with public safety. Giving evidence National Highways Ltd claimed that traffic was delayed by between 4 and 5 hours and that between 9,000 and 30,000 vehicles were impacted. None of the defendants denied the indictment, but they argued that they had a reasonable excuse for their actions.

Sam Holland argued that he had wanted to prevent harm. He had read academic papers which pointed to catastrophic consequences for humanity from burning fossil fuels, including food system collapse.

Rachel Payne explained that she took action because she was fearful for her children and grandchildren about government inaction on the climate crisis. She highlighted the government breaking its 2015 climate agreements by offering new fossil fuel licences.

Isabel Rock said that she felt a duty to look after people younger than herself and that the climate crisis is going to touch every single part of their lives. Taking action was something she weighed up very seriously and that as a self employed person, she knew how hard it was for people to earn money and to get by. However she felt that if they could see some of these agreed facts about the seriousness of the climate crisis, she hoped they would understand.

The Judge, Recorder L Harris, ruled that it was for the jury to decide whether or not the supporters had a reasonable excuse for their actions.

In their closing speeches, all the defendants were able to refer to the agreed facts in the case, which included several key facts relating to the climate crisis.

In his closing speech, Sam Holland said:

"We brought evidence on the largest evil committed in human history: the continued drilling and burning of oil and gas in full knowledge that large parts of humanity will be killed. The prosecution has said that these are beliefs. They are not beliefs. This is not a cause. This is not another 'issue'. This is billions of deaths. Not according to me, according to the world's leading scientists. These are the facts. If we hit 3C of warming by 2050, there could be four billion human deaths. Half of the world's current population.

"What was the UK government doing? It was issuing over 100 new licences for companies to explore and drill oil and gas in the North Sea. In the knowledge of everything I've just said, which is public knowledge and has been known for decades, the government was still wanting to drill. Unimaginable evil. We all talked about how we had extensively tried other methods for making change. Signing petitions, emailing MPs, going on conventional marches... So we had to turn to disruptive action.'

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"I thank the members of the Jury deeply for their 'common sense' verdict — they were actually permitted to hear the several climate related agreed facts, which were read out to them, about the severe threats the present emergency poses to our world and they listened!

I thank the prosecution for agreeing to those facts following earlier trials I attended in which the 'whole truth' was repeatedly denied to the Jury. I thank the Judge for allowing them to decide that we "more likely than not" had a reasonable excuse for what we did.

In my statement to the police, I urgently expressed my fears for my family and world and my hopes for an 'eco-U- turn'. With this acquittal, I feel this may be closer to being made possible. The tide may well be turning if the agreed facts on climate, allowed in this trial, can become widely known and acted upon internationally."

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.

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: https://juststopoil.org/press-media

Heathrow 10 images here:
https://drive.google.com/drive/folders/1mByhU4LBPB6t5pMAP_-5dJOkhvsxwTNX?usp=sharing

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Morning Star for Peace and Socialism

Britain / 29 August 2025

Eight JSO supporters acquitted of public nuisance after petrol station action



JSO activists blocking a service station on the M25 in August 2022. Photo: Just Stop Oil

EIGHT Just Stop Oil activists have been cleared of causing a public nuisance after disrupting Britain's largest petrol station.

Michael Davies, Charles Laurie, Phoebe Frewer, Sophie Sharples, Tez Burns, Peter Lay, Gareth Harper and Emma Ireland took action at Cobham motorway services in Surrey in August 2022.

As part of a wider campaign targeting petrol stations along the M25, the activists were among a group of 35 who also took action at Clacket Lane services in Kent and Thurrock services in Essex.

At Guildford Crown Court on Wednesday, all eight defendants were found not guilty of intentionally or recklessly causing a public nuisance by blocking the entrance to Cobham services.

However, Mx Burns and Mr Lay were found guilty of causing criminal damage, while Mr Laurie was found guilty of possession of a hammer with intent to damage property after two petrol pumps were damaged.

Following the verdict, Ms Ireland said: "I am grateful to the judge and the prosecution for allowing the agreed facts on the climate crisis to have played a part in this trial and for allowing us to speak to our motivations without fear of being found in contempt of court.

"The prosecution spoke about common sense and I was reminded that, in 2022, I felt that common sense would have been for the Conservative government to stop issuing new oil and gas licences, to show a commitment to reducing carbon emissions and, in turn, to offer some protection to humanity from the gravest predictions of climate collapse."



Elizabeth Short

Morning Star for Peace and Socialism

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Hung jury in latest Just Stop Oil gantry case

Court & Prison, Press / July 21, 2025

A Just Stop Oil supporter faces retrial after a jury was unable to reach a verdict in relation to her participation in the M25 gantry climbing actions in November 2022 demanding an end to new oil and gas licencing. [1]

A 12-member jury at Southwark Crown Court was unable to reach a verdict in the case of a Just Stop Oil supporter charged with the new statutory offence of 'causing a public nuisance' under the Police, Crime, Sentencing and Courts Act 2022, following more than 9 hours of deliberations over three days.

Theresa Norton, 66, a former councillor and carer, took part in a Just Stop Oil action on the M25 in November 2022, during which she climbed a gantry near junction 1b on 7 November, to demand an end to all new oil and gas projects – a demand that has since been adopted as official government policy. She did

The CPS has now been allowed 7 days by Judge Tomlinson to determine whether it will pursue a retrial.

In her evidence to the Jury, Norton said:

"I acted on my conscience. My despair turned into action into hope. Sadly, conscience is not a legal defence. Therefore, you'll be directed to ignore this evidence, all that I've said, and come to your verdict only on the evidence as presented by the prosecution. This leaves you with no choice, no agency, you have become part of the machinery of state. Accepting of the cognitive dissonance that can happily see a government declare such statements as seen in the Agreed Facts, whilst simultaneously issuing 130 new oil and gas licences, planning for extra runways at airports, building more roads, refusing to implement plans to insulate our badly designed cold and draughty homes, continuing with subsidies to fossil fuel companies to the tune of millions of pounds a week and delaying investment for sustainable green energy, because the fossil fuel lobby is powerful and generous with donations to influential think tanks.

The climate crisis was only getting worse in 2021. Talks by eminent climate scientists were telling us to act, do something. In 2022, a third of Pakistan was under flood water- 1700 dead, 13,000 injured, 8 million displaced. Portugal, Germany and France had rampant wildfires. In July there were wildfires in UK and 40 degrees in London for the first time. London Fire Brigade had its busiest day since WW2.

Civil resistance is a communicative act. It communicates that something is very wrong and needs to change. It is not trying to seize power in a violent armed revolution. It is nonviolent and peaceful. Facts, information and science do not motivate people to change. Tell a smoker that smoking kills and they'll carry on. Facts are not what powers the human heart. That's why just talking about science will not save us and quoting all the statistics in the world will not move us to change. You have to bring emotions into it. Nonviolent direct action has a history of effecting change. We've been vindicated. That oil and gas will stay in the sea. But I stand here because I maintain the courage of my convictions. I believe that when we see clearly through that state machinery, it is only our collective conscience that can truly be relied upon."

During the trial, the Crown prosecution acknowledged the findings of the 2020 Net Zero Interim report, which stated:

"Climate change is an existential threat to humanity. Without global action to limit greenhouse gas emissions, the climate will change catastrophically with almost unimaginable consequences for societies across the world." [3]

Additionally, the prosecution agreed upon the established scientific consensus that warming exceeding 1.5 degrees Celsius above pre-industrial levels poses 'catastrophic' and 'irreversible' risks to humanity. It was further accepted that the average global temperature rise for the year ending 2024 was 1.65 degrees Celsius, with projections indicating that warming would permanently surpass 1.5 degrees Celsius before 2030.

Just Stop Oil continues to stand by those prosecuted for peaceful resistance against fossil fuel expansion in the face of rapidly accelerating climate collapse.

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

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Notes to Editors

[1] Just Stop Oil is a member of the A22 Network of civil resistance projects.

April 26th 2025 was the last Just Stop Oil action, but our supporters will continue to tell the truth in the courts, speak out for our political prisoners, and call out the UK's oppressive anti-protest laws.

Just Stop Oil continues to rely on small donations from the public to make this happen.

[2] https://juststopoil.org/2023/10/30/no-prison-for-m25-injunction-breakers/

[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004025/210615_NZR_interim_report_Master_v4.pdf

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Palestine Action

This article is more than **4 months old**

Palestine Action activists cleared of aggravated burglary at Israeli defence firm site

None of the six activists were convicted of any offence over break-in at Elbit Systems factory near Bristol in 2024

Haroon Siddique *Legal affairs correspondent*

Wed 4 Feb 2026 13.54 GMT

Prefer the Guardian on Google

Six Palestine Action activists have been cleared of committing aggravated burglary over a break-in at an Israeli defence firm's UK site.

Charlotte Head, Samuel Corner, Leona Kamio, Fatema Rajwani, Zoe Rogers and Jordan Devlin were accused of threatening unlawful violence and using sledgehammers as weapons after a prison van was driven into Elbit Systems' factory in Filton, near Bristol, on 6 August 2024.

But after a trial at Woolwich crown court, south London, none were convicted of any offence.

All six were acquitted of aggravated burglary, which carries a maximum sentence of life imprisonment, and jurors found Rajwani, Rogers and Devlin not guilty of violent disorder.

The jury deliberated for 36 hours and 34 minutes but could not reach verdicts for charges of criminal damage against any of the six defendants. This was in spite of all of the defendants, except Devlin, telling jurors they had entered the factory without permission and damaged Elbit's equipment including computers and drones.

Additionally, no verdict was reached in the allegation that Corner, 23, inflicted grievous bodily harm on police sergeant Kate Evans, or on the charges of violent disorder against Head, Corner and Kamio.

Before the verdicts on Wednesday, Mr Justice Johnson told the jurors he was not going to ask them to deliberate further, because "you believe that you can go no further than you have got to already".

The activists hugged one another in the dock as a dozen of their supporters cheered from the public gallery above.

Deanna Heer KC, prosecuting, had told the jury that the defendants were all armed with sledgehammers, which she said were not only intended to be used to damage property but also as weapons "to be used if necessary to threaten and damage people".

Heer alleged security guards were sworn at, had sledgehammers swung at them and were whipped, while one was sprayed with a foam fire extinguisher.

Rajiv Menon KC, representing Head, said any violence by the defendants was clearly unplanned, that the defendants had not expected security guards to enter the factory and were "completely out of their depth".

He compared Head to the suffragettes, while describing Elbit Systems, of which Elbit Systems UK is a subsidiary, as a "dreadful company [that] has played a critical role in the killing of tens of thousands of Palestinians".

The defence also argued that the security team had used excessive force and pointed to missing CCTV footage.

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During the trial one juror asked the judge whether it would count as a lawful excuse if a defendant believed they were performing a life-saving action by destroying weapons used to kill civilians in an illegal genocide. Johnson said it would not, but Menon reminded the jurors of their absolute right to acquit.

Heer and Johnson both told the jurors, before they began deliberating, that they should disregard their views on the conflict in the Middle East.

After the verdicts, Rogers' mother, Clare, said: "Our loved one's action against Elbit Systems and the state's brutal response have exposed the true values of the government. The government is determined to do business with Israel and protect its weapons industry at any cost.

"Our loved ones dared to poke this beast - and no expense has been spared in policing, prosecuting and imprisoning them without trial. Imagine if the government had put the same amount of money, resources and political will into preventing a genocide."

A spokesperson for Defend Our Juries, which has organised rallies opposing the ban on Palestine Action, which took effect on 5 July last year, said the verdicts were "a huge blow to government ministers" who had "tried to portray Palestine Action as a violent group to justify banning it under badly drafted terrorism legislation".

Amnesty International also said it showed how disproportionate the proscription decision was.

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CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW29

This is the exhibit marked "AJW29" in the witness statement of Alexander James Wright.

Traffic and Travel

Climate campaigners react to 'mixed' CLUED outcome as Leeds Bradford Airport night flights debate rumbles on



By Alex Grant
Senior Reporter

Published 15th May 2026, 16:30 BST

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Leeds City Council are being urged to reconsider part of the ruling

Climate campaigners have reacted to a "mixed decision" on the future of Leeds Bradford Airport's night flights restrictions.

The Group for Action on Leeds Bradford Airport (GALBA) say they are pleased that Leeds City Council has ruled that Leeds Bradford Airport cannot fly an unlimited number of planes at night. This is the result of the council's decision to award a **Certificate of Lawful Existing Use or Development (CLEUD)** to the airport.

However, the climate campaigners say they strongly disagree with the City Council's view that LBA is **allowed to fly an additional 941 planes per year at night**.

Urging them to reconsider that part of the ruling, GALBA has sent a legal letter to the council and is exploring options to potentially challenge the ruling.



GALBA are unhappy that LBA is allowed to fly an additional 941 planes per year at night. | Simon Hulme

"Obviously, it's disappointing that the council has allowed the CLEUD but it's a mixed decision," said Nick Hodgkinson, Chair of GALBA. "The good news is that they did not allow unlimited night time flying at LBA. That's what the airport wanted and they failed.

"However, the council has allowed the airport to fly an additional 941 planes at night every year. We believe that part of the decision is legally incorrect and our lawyers have written to the council today, asking them to put it right.

"In practice, LBA will try to fly all of those additional planes during the summer months, causing a big increase in noise and pollution. That would be bad news for local people, the air we breathe and the climate we all depend on."

GALBA has called into question Leeds City Council's interpretation of the way that planning conditions 6 and 7 work after receiving updated legal advice.

Condition 6 lists all the types of aircraft that are lawfully allowed to fly at night. The council's decision has ruled that the aircraft covered by the CLEUD are now lawfully allowed to fly at night, and therefore they are part of Condition 6.

Meanwhile, Condition 7 places limits on the total number of night flights that can be made by all the types of aircraft listed in Condition 6. The limits are 2,800 in summer and 1,200 in winter. These limits apply to all the aircraft covered by Condition 6, including those now approved by the CLEUD.

Leeds City Council approved and confirmed as lawful up to 941 additional night-time aircraft movements per year by quieter aircraft, a figure which is in line with movement numbers previously operated by the airport.

A spokesperson for the local authority explained: "The council, acting as the local planning authority for Leeds, has determined a CLEUD application submitted by Leeds Bradford Airport. This provides increased clarity on the airport's operation regarding night-time flight numbers, which we are aware is a matter of local interest.

"Leeds Bradford Airport had asked the council to confirm that unlimited flights by these quieter aircraft during the night-time were lawful. The council did not agree to this.

"The 941 newly confirmed movements are in addition to the existing limits on night-time flights at the airport, which were established in a 2007 planning permission and are capped at 2,800 movements during British Summer Time and 1,200 during the winter season. Any additional night-time movements above the 941 figure will count towards these caps."

Local residents previously joined GALBA members to protest in front of Leeds Civic Hall. | Gerard Binks

The CLEUD application, which seeked to establish the lawfulness of take-offs and landings at the airport at night by certain types of aircraft, was **determined following a formal call for evidence by Leeds City Council**.

All flight data submitted by third parties was independently verified by the council and external sources. It is based on UK planning law and an assessment of the airport's flight records over a 10-year period.

Under a condition of Leeds Bradford Airport's planning permission in 2007, the night-time period is defined as running between 11pm and 7am each night. Any aircraft movements above the total capped movements would constitute a breach of planning permission and could be subject to enforcement action.

As part of the CLUED outcome, it was confirmed that the Yeadon-based airport **did not breach the movement limits governing night flights** during the 2023, 2024, and 2025 periods.

A spokesperson for Leeds Bradford Airport said: "We are pleased with the decision by Leeds City Council, which confirms our long-held position that LBA has operated responsibly and in full compliance with night flight regulations over the last three years. This decision provides much-needed certainty for our partners, our passengers, and the local community.

"LBA remains committed to being a responsible neighbour while continuing to serve as a vital economic gateway for the region.

"We look forward to continuing our constructive work with Leeds City Council to develop a sustainable long-term framework for flights that balances the region's connectivity needs with our environmental and local commitments."

It comes as LBA has embarked on LBA:REGEN, its most transformative period in decades including a **fundamental transformation and extension of the terminal building** and the launch of its new Together for Tomorrow sustainability strategy.

As part of its **Together for Tomorrow strategy**, LBA continues to work with airlines to deploy the latest generation of quieter, more fuel-efficient aircraft as part of its ongoing effort to modernise operations and reduce the noise footprint of its flight schedule.

City Council previously issued the airport with an **enforcement notice in September 2024** after they were found to have breached noise rules. Two of three subsequent appeals were dismissed.

The people v Leeds Bradford Airport – a new chapter begins

Night flights ruled illegal by a public enquiry continue to operate but Leeds City Council could now take action to restore control



by **Nick Hodgkinson** — 30-04-2026 06:57 in **Business**, **Region** Reading Time: 6 mins read

AA



Group for Action on Leeds Bradford Airport (GALBA) protest outside Leeds Civic Hall calling on Leeds City Council to immediately stop unlimited, unauthorised night flights. Credit: Neil Terry Photography/ Alamy News Live

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Leeds Bradford Airport (LBA) has submitted yet another planning application to increase nighttime flying. They want the airport's most frequently flown aircraft to be exempt from the cap on night flights. The Group for Action on Leeds Bradford Airport (GALBA) is opposing the application and thinks there's a simple way for Leeds City Council to put an end to the merry-go-round of planning applications.

Long term readers will be familiar with the ongoing struggle between local campaigners, GALBA, and LBA. Since 2020, the airport has been looking for ways to increase its annual passenger numbers from 4.5 million to 7 million by 2030 and 10 million by 2045. And since 2020, GALBA has successfully stopped them.

LBA specifically wants to increase nighttime flying to maximise the number of return flights that can be made to the Med and back in the same day by airlines using LBA. Why? Because a plane on the ground isn't making money.

GALBA wants to protect local people, air quality and the climate

GALBA strongly opposes expansion for three reasons: the health risks that additional night flights would pose to people who live (and try to sleep) under the flight path; the damage that would be done to local air quality from the rise in ultra-fine particles released by jet engines; and the increase in greenhouse gas emissions from extra flights, at a time when scientists warn that humanity is in the last chance saloon to prevent catastrophic climate breakdown.

As the Chair of GALBA, I feel the need to restate our aims because, over the years, these have been misunderstood – or even misrepresented – by some people. To be clear, GALBA does not say the airport should be closed down; nor do we say that people should never fly. We do say that LBA should not be allowed to expand, because the harms that would result far outweigh any benefit that might accrue.

Consistent with our stand on LBA, we also oppose all other proposed airport expansions, following the advice of the government's expert advisers on the Climate Change Committee.



ECONOMY

The People v Leeds Bradford Airport – the conflict continues

BY **NICK HODGKINSON** 1 OCTOBER 2025 - UPDATED ON 19 APRIL 2026

A public enquiry on night flights and its bizarre consequences

So what's been happening? In July last year, LBA's appeal against Leeds City Council's rejection of the airport's applications for Certificates of Lawful Existing Use or Development (CLEUDs) was heard at a public inquiry. LBA wanted to exempt its most commonly used planes from the

cap on night flights forever. The planning inspector ruled against LBA's two most important CLEUDs.

Although LBA's applications were rejected, the bizarre consequence of the public inquiry decision left LBA flying hundreds of aircraft at night that are not lawfully allowed to fly at night at all. However, precisely because they're not lawful, Leeds City Council hasn't counted them towards the limit on the number of flights allowed at night and, because LBA has appealed against the planning inspector's decision, the council hasn't taken any action to stop them.

Now LBA has come back with yet another CLEUD application that seeks to achieve the same result that it wanted previously – exemption from the night flight rules for its most frequently flown aircraft. Yes, it does sound odd, but LBA can keep on applying even though they lost last time.

What's even more frustrating is that a CLEUD is not decided by elected councillors on a planning committee but by an unelected council officer who can only consider the law and the figures. LBA say that if they can prove that the aircraft which are not allowed to fly at night at all have actually been flying at night for 10 continuous years, then those aircraft can fly as often as they want at night – forever – and no one can do anything about it.





A simple way to restore the council's control

Obviously, in GALBA's view that just looks like rewarding bad behaviour. We've submitted our legal and factual arguments to Leeds City Council and will wait for the decision. Our guess is that if LBA loses (again), the airport's managers will appeal (again) and the whole merry-go-

round will continue. But … there is something the council can do to restore control and stop LBA's rule breaking.

There are operating conditions in LBA's existing planning permission, which were set by, and can be used by, Leeds City Council. One of those conditions gives the council a power to approve (i.e. make lawful) nighttime flying by any aircraft that meet certain basic requirements. The aircraft that are the subject of LBA's CLEUD application meet those requirements, so it is within the council's power to approve them.

By doing that, the currently unlawful aircraft would become lawful and therefore have to be counted towards the cap on night flights. Moreover if – or more likely when – LBA next exceeds the night flight cap, Leeds City Council can take enforcement action to force the airport to stay within the limit on flight numbers set by the cap.

Legal support for GALBA's position

Last year, GALBA asked the council to use such powers but we were told that it wasn't possible without an application from LBA. Of course, LBA won't do that because they want no restriction on their aircraft. To confirm whether waiting for an application from LBA was truly necessary, GALBA consulted a leading planning and environment barrister. This barrister, Estelle Dehon KC, said no – the Council can just do it. You can read her legal opinion on GALBA's website. So, we asked the Council again to use their power and now we've been told that the current CLEUD application means they can't. Strange, that's not what they said the first time.

We really need to get to the bottom of this, so we've asked to meet soon with the council's lead elected member for LBA, along with the lawyers advising both GALBA and the council. As the regulator for LBA, we want to work with Leeds City Council to resolve what is frankly an absurd situation.

Hopefully, a meeting of lawyers will lead to a meeting of minds and better protection for local people and the planet.





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Tags: Bradford Environment Health Leeds

Airport seeking night exemption for quieter planes



DANNY LAWSON/PA WIRE

Leeds Bradford Airport wants quieter aircraft to be exempt from a night time flying cap

Spencer Stokes >

Yorkshire business correspondent

13 March 2026 · 52 Comments

Leeds Bradford Airport has defended its decision to apply for immunity from prosecution when it flies certain types of aircraft overnight.

The airport is currently limited to 2,920 aircraft movements between 23:00 and 07:00 BST annually.

But the Group for Action on Leeds Bradford Airport (GALBA) claimed the limit has been breached for four successive years between 2022 and 2025, with more than 500 additional flights each summer season.

GALBA's data is disputed by Leeds Bradford Airport, with chief executive Vincent Hodder suggesting that new aircraft that have a noise level of 87 dB or less shouldn't be included in the summertime night cap figures.

The airport's legal submission to Leeds City Council argued that aircraft below 87 dB operated continuously between 2010 and 2019 without enforcement and should, therefore, remain exempt now and in the future.

The airport is applying to the council for a certificate of lawful existing use or development (CLEUD) that would allow the quieter aircraft to remain outside the night quota.

Hodder said: "UK planning law lays out that if a breach of planning has existed continuously for a long period of time and that everybody has adjusted to the way restrictions on the airport apply, then those things become immune from enforcement.

"Our argument is for 10 years the airport continuously operated quieter aircraft during the night period that were in breach of the planning conditions in place at that time - we would argue that because that has happened it should be allowed to continue."



REUTERS

A growing number quieter aircraft like the Boeing 737 MAX have come into service in recent years

GALBA described the airport's application as "irresponsible and cowardly".

Ian Coatman, from the group, said: "LBA's argument is like a burglar being able to say, 'I've been stealing for 10 years and I haven't been caught, so now I can steal as often as I like forever and there's nothing anyone can do to stop me'."

He added: "To be clear, no one is saying people should never take holidays abroad, but frequent night noise is harmful to the many thousands of people who live under the flight path."

Horsforth resident Susan Ditchfield lives close the runway and moved into her home before night flying had been permitted.

"It's relentless, one after another after another, just in a short space of time during the night, then there's a lull and then it starts again, it's just dreadful and such a nuisance," she said.



GALBA campaigners have protested against night flights at Leeds Bradford Airport

The airport said in the longer term it wanted to fly more than the summer night limit and hoped to change the regulations to a noise-based system, rather than one that counts individual aircraft movements.

Hodder added: "What we want to do is to change the rules around the way that the night flights are counted to provide a foundation for monitoring and controlling the level of noise which is produced by the airport and which causes discomfort for people who live around the airport."

Leeds City Council is asking for third parties to submit relevant factual evidence, such as flight data, flight times, flight frequency and size of aircraft – relating to the specific operations at Leeds Bradford so that they can be considered as part of the CLEUD application.

A council spokesperson said: "A call for evidence from third parties is currently ongoing in relation to the flying of certain types of aircraft during the nighttime period at Leeds Bradford Airport between 1 January 2010 to 31 December 2019.

"This began earlier this month and ends on 26 March, so it would be inappropriate to comment further until this process has been concluded and the evidence provided has been assessed."

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20 November 2025

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CLAIM NO: KB–2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW30

This is the exhibit marked "AJW30" in the witness statement of Alexander James Wright.

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.

N244

Application notice

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Name of court **The High Court of Justice** **King's Bench Division**	**Claim no.** **KB-2024-002317**
Fee account no. (if applicable) **PBA0087211**	**Help with Fees – Ref. no.** (if applicable) H W F - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Leeds Bradford Airport Limited and others	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	18 June 2026 18 Jun 2026

HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION

KB-2024-002317

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

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?

The Claimants seek permission, pursuant to CPR 17.1, to amend the Amended Claim Form and Amended Particulars of Claim in the form accompanying this application, so as to amend:

1. the definition of the Defendants (Persons Unknown) in the Amended Claim Form and Amended Particulars of Claim;
2. the Claim Form by Substituting "Plan 2" with the annexed plan marked "Amended Plan 2";
3. the Amended Particulars of Claim by substituting "Plan 2", "Plan 2A" and "Plan 2B" with the annexed plans marked "Amended Plan 2", "Amended Plan 2A" and "Amended Plan 2B"; and
4. the Amended Particulars of Claim so as to update reference within them to the London Luton Airport Byelaws 2025, which have replaced the previously applicable London Luton Airport Byelaws 2005.

The Claimants ask that this application be considered and heard at the second annual review of the injunctions granted pursuant to the order of Ritchie J dated 18 July 2024, which has been listed to take place on 30 June 2026 (together with the second annual review of the injunctions granted in actions KB-2024-002132, KB-2024-002473 and KB-2024-001765).

The Claimants will file a draft form of order ahead of such hearing, which will provide for this application.

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	30 June 2026 (second annual review hearing)
8. What level of Judge does your hearing need?	High Court Judge
9. Who should be served with this application?	Defendants (Persons Unknown)
9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.	The Claimants will arrange for service on the Defendants (Persons Unknown)

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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.

We refer to the witness statement of Alexander James Wright dated 11 June 2026 ("**the 11 June 2026 Statement**") which has previously been filed with the Court in these proceedings.

1. Definition of the Defendants (Persons Unknown) in the Amended Claim Form and Amended Particulars of Claim

The Claimants apply for permission to amend the Amended Claim Form and Amended Particulars of Claim in the form enclosed with this application so as to amend the definition of the Defendants (Persons Unknown) in the light of the evidence contained within the the 11 June 2026 Statement - which the Claimants respectfully submit should be reflected in the statements of case and the definition of the Defendants (Persons Unknown).

2. Substitution of the Plans appended to the Amended Claim Form and the Amended Particulars of Claim

For the below reasons, the Claimants apply for permission to amend:

a) the Amended Claim Form by Substituting "Plan 2" with the annexed plan marked "Amended Plan 2".
b) the Amended Particulars of Claim by substituting "Plan 2", "Plan 2A" and "Plan 2B" with the annexed plans marked "Amended Plan 2", "Amended Plan 2A" and "Amended Plan 2B".

As is more fully explained at paragraph 6 of the 11 June 2026 Statement, the extent of the land over which the London Luton Airport Byelaws 2025 apply differs from that over which the London Luton Airport Byelaws 2005 apply – the extent of the differences between them is shown on the plan exhibited at Exhibit AJW10 of the 11 June 2026 Statement.

Adopting the same definitions used in the 11 June 2026 Statement, in respect of the LTN 2025 Areas:

1. the land making up the area shaded purple and marked 'Area 1' on the enclosed plan is land on which the majority of London Luton Airport's landing lights, but not all, are located. For the reasons explained at paragraph 6.4.1.3 of the 11 June 2026 Statement, such land is not land in respect of which the Second Claimant proposes to seek an amendment to the current London Luton Airport injunction plan;

2. the land making up the area shaded purple and marked 'Area 2' on the enclosed plan is land which is erroneously included within the scope of the London Luton Airport Byelaws 2025. It is therefore not land in respect of which the Second Claimant proposes to seek an amendment to the current London Luton Airport injunction plan; and

3. the land making up the area shaded purple and marked 'Area 3' on the enclosed plan is land which is used by the airport's car park operator (APCOA) to store cars. This is not land in respect of which the Second Claimant proposes to seek an amendment to the current London Luton Airport injunction plan – on the basis that (a) this area of land can only be accessed by passing through the wider airport estate; and (b) such protection is considered appropriate and sufficient.

Adopting the same definitions used in the 11 June 2026 Statement, in respect of the LTN 2005 Area, the Second Claimant proposes an amendment to the current London Luton Airport injunction plan, so as to reflect the extent of the land over which the London Luton Airport Byelaws 2025 applies, with a further minor amendment proposed in respect of the area within the immediate vicinity of the roundabout at this location, which the Second Claimant proposes in the interests of better demarcating the geographical extent of the injunction boundary than would otherwise be the case if the London Luton Airport Byelaws 2025 was adopted without amendment. The area to the west of the roundabout at this location is a car park area.

The Claimants respectfully submit that the above should be reflected in the plans appended to the statements of case.

3. The London Luton Airport Byelaws 2025

The Claimants apply for permission to amend the Amended Particulars of Claim in the form enclosed with this application so as to refer to the provisions of the the London Luton Airport Byelaws 2025, which have replaced the the London Luton Airport Byelaws 2005 - which the Claimants respectfully submit should be reflected in the statements of case.

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

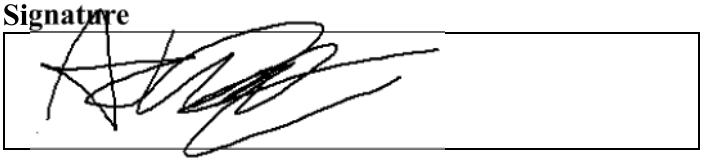
Statement of Truth

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
18	June	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

+44 750 057 8620

Fax phone number

DX number

Your Ref.

292659.000057/WRIGHTAX

Email

alexwright@eversheds-sutherland.com

Amended pursuant to the order of the Honourable Mr Justice Ritchie dated 23 July 2024

Draft Re-Amended Claim Form

Claim Form

In the	High Court of Justice Kings Bench Division
Fee Account no.	PBA 0087211
Help with Fees - Ref no. (if applicable)	H W F – –

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.

	For court use only
Claim no.	
Issue date	

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

(1) **LEEDS BRADFORD AIRPORT LIMITED**
of Leeds LS19 7TU
(2) **LONDON LUTON AIRPORT OPERATIONS LIMITED**
of Percival House, 134 Percival Way, London Luton Airport, Luton LU2 9NU
(3) **NEWCASTLE INTERNATIONAL AIRPORT LIMITED**
of Woolsington, Newcastle Upon Tyne, NE13 8BZ
(4) **NIAL SERVICES LIMITED**
of Unit 1,Prestwick Industrial Est., Ponteland, Newcastle Upon Tyne, NE20 9DA

HIGH COURT OF JUSTICE SEAL 23 Jul 2024 QUEEN'S BENCH DIVISION

KB-2024-002317
DATE OF ISSUE
16/07/24

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

Please refer to Schedule 1 attached to the Claim Form

Brief details of claim

The Claimants seek an injunction to restrain the Defendants from acts of trespass and/or private and/or public nuisance on the land edged red on Plans 1 - 3.

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.

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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

- [x] attached
- [ ] to follow

Statement of truth

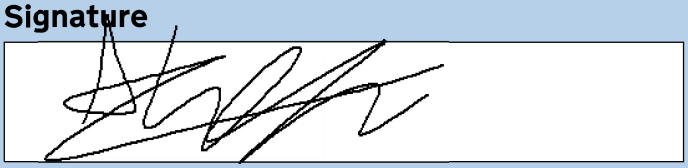
Note: you are reminded that a copy of this claim form must be served on all other parties.

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
16	0 7	2 0 2 4

Full name

Alexander James Wright

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

Principal Associate

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.

362090.000001

Email

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

SCHEDULE 1 TO THE CLAIM FORM

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE)

London Luton Airport - Amended Plan 2



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Amended pursuant to the order of the Honourable Mr Justice Ritchie dated 23 July 2024

Re-amended pursuant to the order of [ ] dated [ ]

CLAIM NO: KB – 2024 - 002317

IN THE HIGH COURT OF JUSTICE

KINGS BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

(4) NIAL SERVICES LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP

OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE)

Defendants

[DRAFT] RE-AMENDED PARTICULARS OF CLAIM
~~**PURSUANT TO THE ORDER OF THE HONOURABLE MR JUSTICE RITCHIE**~~

~~**DATED 23 JULY 2024**~~

Leeds Bradford Airport

1. The First Claimant is the operator of Leeds Bradford Airport, located in Leeds, LS19 7TU, shown outlined in red on Plan 1 ("**LBA**"). LBA serves around 4 million travelling passengers each year with an annual revenue of approximately £43 million.

2. The First Claimant is the registered proprietor of the land on which LBA is situated as shown in red on Plan 1, through a mixture of freehold and leasehold interests as shown in the Title Schedule hereto — but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas and subject also to certain highways.

3. Subject to those interests, the First Claimant is entitled to an immediate right of possession occupation and control of LBA by virtue of its titles as shown in the Title Schedule.

4. Plan 1A identifies the areas within LBA over which the First Claimant lacks (or does not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests ("**the LBA Third Party Areas**") or public rights of way ("**the LBA Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First Claimant does not assert that it is the person with an immediate right of occupation or possession.

    a. The LBA Third Party Areas are indicated by blue and green shading. The blue shading indicates areas within LBA which are the subject of leases or other occupational arrangements. The green shading indicates parts of LBA which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

b. The LBA Highways are indicated by pink and purple shading. The pink highways are located at ground level and provide access to LBA to the First Claimant and its licensees (including members of the public). The purple highway runs beneath the runway at the airport.

5. As indicated on Plan 1A, there is one area shaded in blue which directly abuts the red line on the southern boundary of LBA. At that location, the boundary of LBA is not in the possession or control of the First Claimant. Apart from that exception: access to or from the LBA Third Party Areas by the public from outside the airport, involves the use of areas of LBA which remain unencumbered by any such arrangement and in relation to which, accordingly, the First Claimant remains entitled to possession occupation and control by virtue of their interests shown in the Title Schedule.

6. Plan 1B identifies the various interests held by the First Claimant in the land on which LBA is situated. At the south east, abutting the land shown hatched in pink registered under title WYK232726 at HM Land Registry, are landing lights ("**the LBA Landing Lights**"). Title to the land on which those lights are situate is registered in a third party's name. By an agreement dated 10 December 1982, a predecessor in title to the First Claimant was granted the right to erect and maintain landing lights in the relevant area of land. That agreement is unregistered.

7. By virtue of s63 of the Airports Act 1998 6, the First Claimant has power to make byelaws with respect to LBA. Pursuant to the Leeds Bradford Airport Byelaws 2022, byelaw 3.24, no person has a right to use any part of LBA as defined therein for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. The plan which defines LBA for the purposes of the byelaws does not extend in the south to the LBA Landing Lights. Apart from that, it includes all the land outlined in red on Plan 1A together with other land (shaded in yellow on Plan 1A). As at the date of commencement of this claim, the First Claimant seeks no relief in relation to the yellow land, notwithstanding that such land is within the byelaws, because the yellow land is not within the operational boundary of LBA. The First Claimant does not, however, repudiate the right to seek relief in relation to such areas, should events materialise which make that course appropriate.

London Luton Airport

8. The Second Claimant is the operator of London Luton Airport, located in Luton, LU2 9LY, shown outlined in red on Plan 2 ("**Luton Airport**"). Luton Airport serves around 16.4 million travelling passengers each year with an annual revenue of approximately £296 million.

9. The Second Claimant is the proprietor of the land on which Luton Airport is situated as shown in red on Plan 2, through the interests shown in the Title Schedule hereto—— but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

10. Subject to those interests of third parties, the Second Claimant is entitled to an immediate right of possession occupation and control of Luton Airport, by virtue of its titles as shown in the Title Schedule.

11. Plan 2A identifies the areas within Luton Airport over which the Second Claimant lacks (or does not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the Luton Third Party Areas**") or public rights of way ("**the Luton Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Second Claimant does not assert that it is the person with an immediate right of occupation or possession.

    a. The Luton Third Party Areas are indicated in black, blue and green. The black land is a Direct Air-Rail Transit ("DART") and DART station. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

    b. The Luton Highways are indicated in pink. These provide access to Luton Airport to the Second Claimant and its licensees (including members of the public).

12. As indicated on Plan 2A, certain of the Luton Third Party Areas abut the red line on the western boundary of Plan 2A. At those locations, the boundary is not in the possession or control of the Second Claimant. Subject to that: access to or from the Luton Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Luton Airport which remain unencumbered

by any such arrangement and in relation to which, accordingly, the Second Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

13. Plan 2B identifies the various interests held by the Second Claimant in the land on which Luton Airport is situated. To the east of the land shown hatched green, are various landing lights some of which are situate on the land shown shaded in blue registered under title HD544934 at HM Land Registry (which the Second Claimant has a proprietary interest in). The remainder of the landing lights are shown in red but are not situate on the land shaded in blue ("**the Luton Landing Lights**"). Title to the land on which the Luton Landing Lights are situate is registered in a third party's name. The Second Claimant does not assert paper title to the land on which the Luton Landing Lights are situated. However, the Second Claimant has exclusive possession of the land in question by virtue of the installation of the lights, without consent from any person, and which have been in that location for around 20 years.

14. By virtue of s63 of the Airports Act 19~~9~~86, the Second Claimant has power to make byelaws with respect to Luton Airport. Pursuant to the London Luton Airport Byelaws 2025 ~~2005~~, byelaw 8.8 ~~2.16~~, no person, without permission, shall organise or take part in any public assembly, protest, demonstration or procession ~~no person has a right to use any part of Luton Airport for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport~~. Save for the Luton Landing Lights, the plan which defines Luton Airport for the purposes of the byelaws includes all the land outlined in red on Plan 2A.

Newcastle Airport

15. The Third Claimant is the operator of Newcastle International Airport, located in Woolsington, Newcastle upon Tyne, NE13 8BZ, shown outlined in red on Plan 3 ("**Newcastle Airport**"). Newcastle Airport serves around 5 million travelling passengers each year with an annual revenue of approximately £65 million.

16. The Third and Fourth Claimants are the proprietors of the land on which Newcastle Airport is situated as shown in red on Plan 3, through the interests shown in the Title Schedule hereto—but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

17. Subject to the aforesaid interests of third parties, the Third and Fourth Claimants are entitled to an immediate right of possession occupation and control of Newcastle Airport, by virtue of its titles as shown in the Title Schedule and the agreements dated 21 January 2005; 4 May 2023; 20 October 1999; and 31 August 2020.

18. Plan 3A identifies the areas within Newcastle Airport over which the Third and Fourth Claimants lack (or do not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the Newcastle Third Party Areas**") or public rights of way ("**the Newcastle Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Third and Fourth Claimants do not assert that they are the person with an immediate right of occupation or possession.

    a. The Newcastle Third Party Areas are indicated in black, blue and green. The black land is a railway station. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

    b. The Newcastle Highways are indicated in pink. These provide access to Newcastle Airport to the Third and Fourth Claimants and their licensees (including members of the public).

19. As indicated on Plan 3A, parts of the Newcastle Third Party Areas, being those areas shaded in blue which abut the red line at the north of Plan 3A and on the eastern and western boundary of Plan 3A. At those locations, the boundary is not in the possession or control of the Third and/or Fourth Claimants. Subject to that: access to or from the Newcastle Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Newcastle Airport which remain unencumbered by any such arrangement and in relation to which, accordingly, the Third and Fourth Claimant remain entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

20. Plan 3B identifies the Third and Fourth Claimants' various registered interests in the land on which Newcastle Airport is situated. On the western and eastern boundaries of the land registered under title number TY433695 at HM Land Registry, are landing lights ("**the Newcastle Landing Lights**"). Title to the land on which those lights are situate is registered in a third party's name. By agreements dated 21 January

2005; 4 May 2023; 20 October 1999; and 31 August 2020, the Third Claimant was granted rights to erect and maintain landing lights in the relevant areas of land. Such rights or interests thereby granted are unregistered.

21. By virtue of s63 of the Airports Act 19~~9~~86, the Third Claimant has power to make byelaws with respect to Newcastle Airport. Pursuant to the Newcastle Airport Byelaws 2021, byelaw 4.12 and 4.18, no person has a right to use any part of Newcastle Airport for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the Newcastle Landing Lights, the plan which defines Newcastle Airport for the purposes of the byelaws includes all the land outlined in red on Plan 3A.

The Claimants' claims

22. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management/ airline facilities, and (save at LBA) a railway station.

23. In relation to each airport:

    a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).

    b. No wider consent subsists; and (subject to the highways described above) no public right of access, or way, subsists over the airports.

    c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.

d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

24. In relation to the Third Party Areas at each airport:

a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the Court to make an order which does not distinguish between the airports generally (as shown outlined in red on the various plans) and the Third Party Areas within them;

b. Further or alternatively, protest which occurs on the Third Party Areas interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.

25. In relation to the landing lights:

a. For the LBA Landing Lights and/or the Newcastle Landing Lights, paragraph 23 above applies mutatis mutandis.

b. Alternatively and/or in respect of the LBA Landing Lights and/or the Luton Landing Lights and/or the Newcastle Landing Lights, paragraph 24a above applies mutatis mutandis and/or protest which occurs on the land on which the lights are situate interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the First and/or Second and/or Third Claimants' land, insofar as a need might arise to close off the runway for safety reasons in the event that the landing lights became compromised or threatened.

26. Further, in respect of the LBA Highways, the Luton Highways and the Newcastle Highways described above: protest which occurs on these highways interferes and/or threatens to interfere:

a. Unreasonably and substantially, with the Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;

b. Unreasonably and substantially, with (and/or to obstruct or hinder) the free passage along the highway, occasioning particular damage to the Claimants; and

c. Further, in respect of the tunnelled highway in pink on Plan 1A, unreasonably and substantially, with the First Claimant's ordinary use and enjoyment of LBA, insofar as a need might arise to close off the runway for safety reasons; and

d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the byelaws.

The threats

27. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:

28. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations…"

29. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").

30. 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.

31. Since that 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?"*

32. 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?"*

33. 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****.*
>
> *…"*

34. 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.*

[1] As of 11 July 2024, £24,275 had been raised on this website.

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/tZIoduqpqTMtE9dgMMhlaymvEZgO45jgJ19A)

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,

Just Stop Oil"

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

36. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at London Stansted Airport (in an area which is subject to an occupational arrangement with a third party), as part of a series of protests on climate change. This included:

    a. an individual using an angle grinder to cut a hole in the perimeter fence of the airport;

    b. two individuals trespassing the perimeter fence; and

    c. spray painting two aircrafts orange using a fire extinguisher.

37. As a result of this direct action:

    a. It was necessary to suspend operations on the runway at Stansted Airport for approximately 50 minutes: three aircraft departures were affected.

b. the two individuals (known as Jenifer Kowalski and Cole Macdonald) were arrested and charged with causing criminal damage, aggravated trespass and interference with the use or operation of national infrastructure.

38. Further, in respect of LBA and Luton Airport:

a. in the period between 2019 and 2022, Extinction Rebellion repeatedly carried out protests about the planned expansion of LBA, including on highways and/or accessways to LBA. In September 2023, the First Claimant commenced construction works at LBA in order to expand the airport.

b. in the period between 2020 and 30 May 2024, various environmental protest groups carried out protests against the expansion of Luton Airport.

39. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for LBA, Luton Airport and/or Newcastle Airport

a. trespass on the airports and/or

b. by protest conducted on or from the Third Party Areas and/or on or from the land on which the LBA Landing Lights, Luton Landing Lights and/or Newcastle Landing Lights are situate, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or

c. by protest conducted on or from the highways, obstruct those occasioning particular damage to the Claimants and/or interfere with the Claimants' right of access to the airports via those highways, so as to cause a nuisance actionable by the Claimants.

40. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.

41. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:

42. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively

modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.

43. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive — by which point harm may already have occurred.

44. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.

45. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.

46. The airports in the present case are all the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the Claimants are fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the Byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at Stansted Airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself

to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.

47. Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.

48. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND THE FIRST CLAIMANT CLAIMS AGAINST THE FIRST DEFENDANT:

(1) Subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months or such other period as the Court may determine, an order that the First Defendants must not, without the consent of the First Claimant enter, occupy or remain upon the land outlined in red on Plan 1.

AND THE SECOND CLAIMANT CLAIMS AS AGAINST THE SECOND DEFENDANT:

(2) Subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent of the Second Claimant, enter, occupy or remain upon the land outlined in red on Plan 2.

AND THE THIRD AND FOURTH CLAIMANTS CLAIM AGAINST THE THIRD DEFENDANT:

(3) Subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Third Defendants must not, without the consent of the Third and Fourth Claimants (or either of them), enter, occupy or remain upon the land outlined in red on Plan 3.

STATEMENT OF TRUTH

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

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

_____

Alexander James Wright

~~Principal Associate~~ Legal Director

Eversheds Sutherland (International) LLP

Claimants' solicitor

Dated: ~~16~~ ~~23 July 2024~~

TITLE SCHEDULE TO THE PARTICULARS OF CLAIM

1. **The First Claimant is the registered proprietor of the following titles:-**

Title number	Freehold / Leasehold
WYK232726	Freehold
WYK269721	Freehold
WYK275282	Freehold
WYK461796	Freehold
WYK500833	Freehold
WYK500834	Freehold
WYK512407	Freehold
WYK547070	Freehold
WYK547071	Freehold
WYK570873	Freehold
WYK574741	Freehold
WYK624715	Freehold
WYK657177	Freehold
WYK657180	Freehold
WYK698270	Freehold
WYK698436	Freehold
WYK706576	Freehold
WYK775942	Freehold
WYK723309	Freehold
WYK806314	Freehold
WYK831477	Freehold
WYK857105	Freehold
WYK857106	Freehold
WYK395678	Freehold
WYK657178	Leasehold
WYK501284	Leasehold

2. **The Second Claimant is the registered proprietor of the following titles:-**

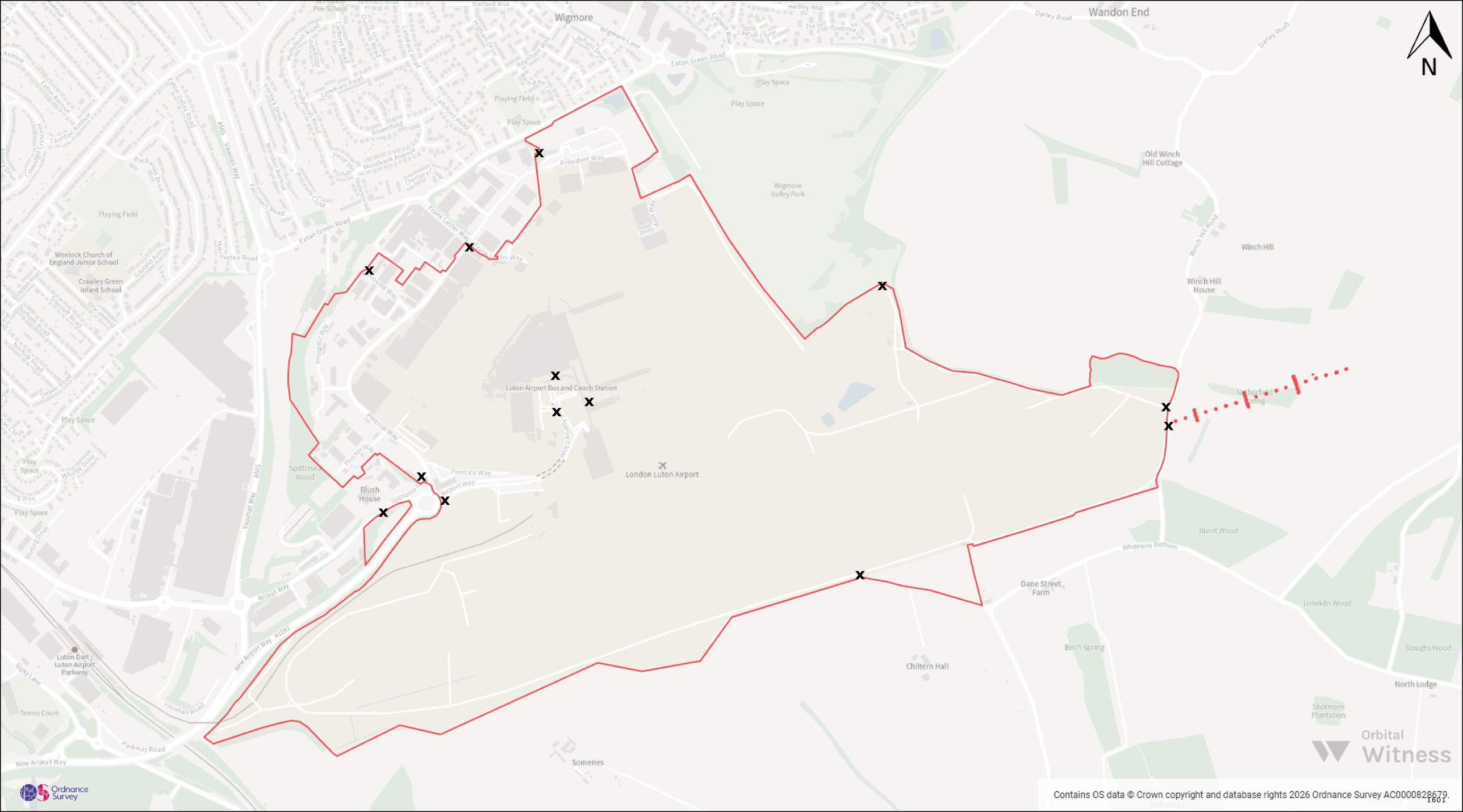
Title number	Freehold / Leasehold
BD235078	Leasehold
BD206048	Leasehold
BD339131	Leasehold
BD332840	Leasehold
BD216008	Leasehold
HD544934	Leasehold

3. **The Third Claimant is the registered proprietor of the following titles:-**

Title number	Freehold / Leasehold
TY349352	Freehold
TY476495	Freehold
TY433695	Freehold

4. **The Fourth Claimant is the registered proprietor of the following titles:-**

Title number	Freehold / Leasehold
ND75730	Freehold


N
Wigmore
Wandon End
Eaton Green Road
Play Space
Playing Field
President Way
Wigmore Valley Park
Old Winch Hill Cottage
Winch Hill
Winch Hill House
Luton Airport Bus and Coach Station
London Luton Airport
Percival Way
Prentice Way
Airport Way
Spittlesea Wood
Blush House
Burnt Wood
Whiteway Bottom
Dane Street Farm
Limekiln Wood
Sloughs Wood
North Lodge
Chiltern Hall
Birch Spring
Shotmore Plantation
Someries
Luton Dart / Luton Airport Parkway
Vauxhall Road
Parkway Road
New Airport Way
Wenlock Church of England Junior School
Crawley Green Infant School
Orbital Witness
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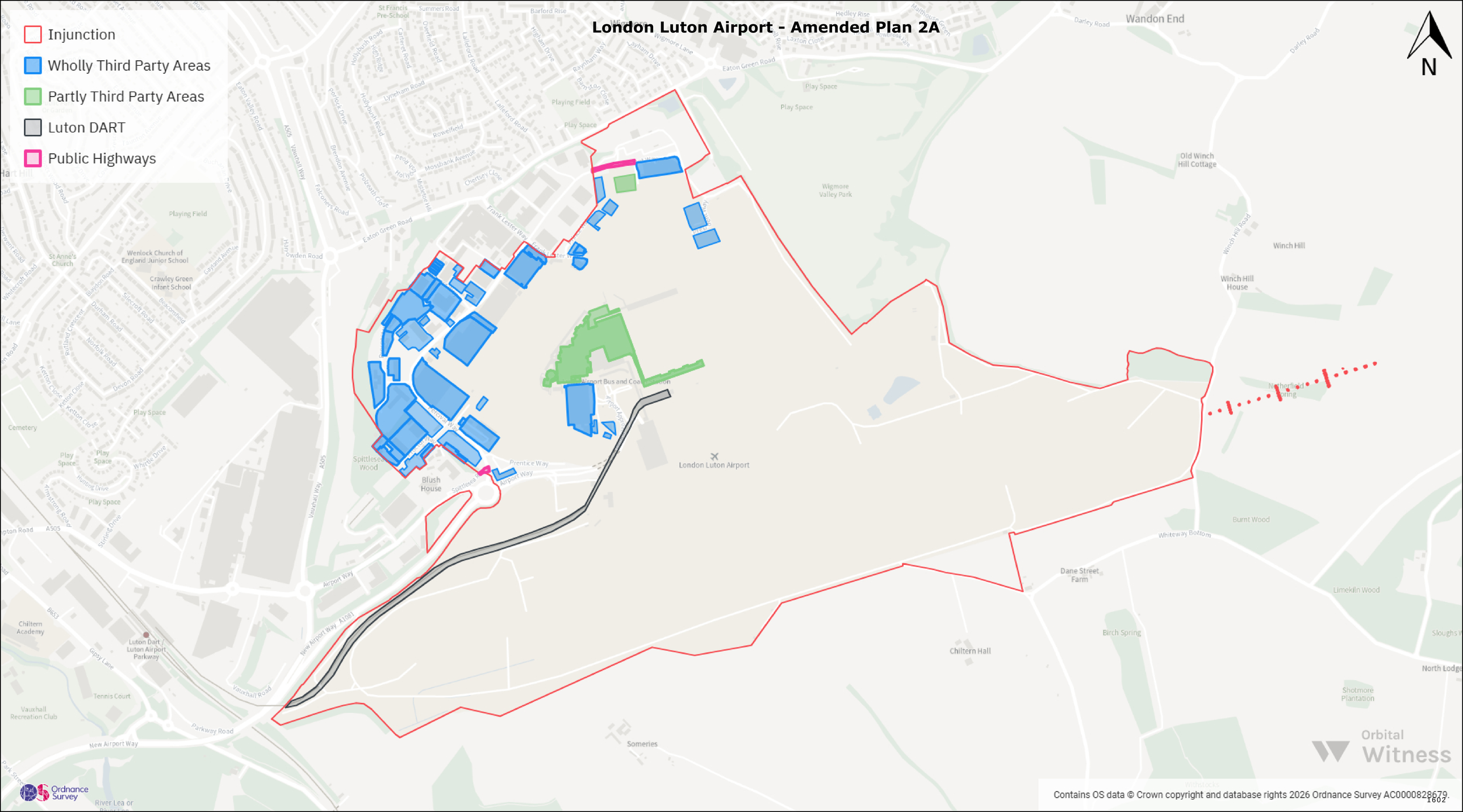
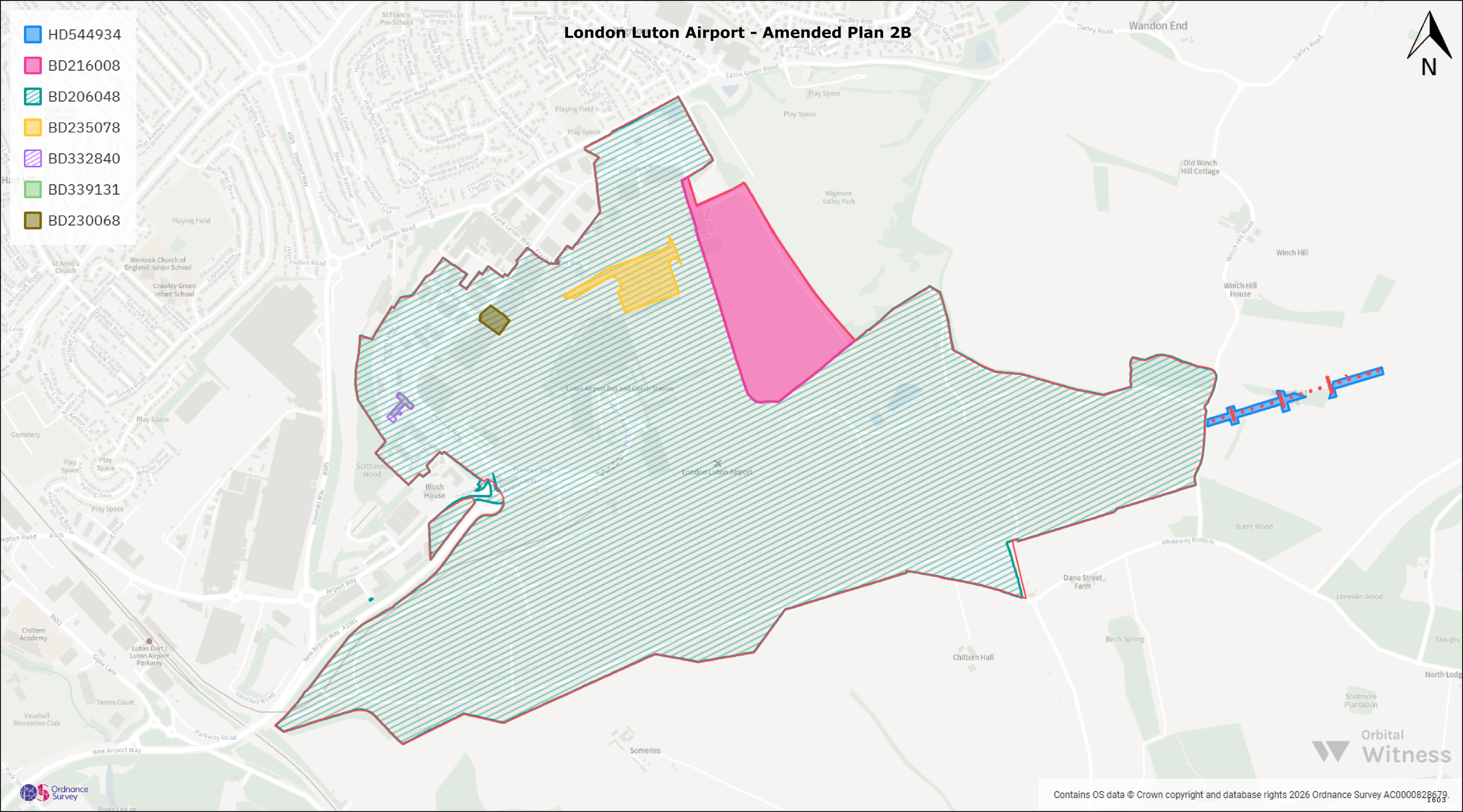
London Luton Airport - Amended Plan 2A



London Luton Airport - Amended Plan 2B



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CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

Draft Order

This exhibit appears at pages 2064 to 2100.

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Amended Pursuant to CPR 17.1(1)

Claim Form

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 – –

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.

For court use only	
Claim no.	KB-2024-002473
Issue date	31 July 2024

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

(1) BIRMINGHAM AIRPORT LIMITED of Diamond House, Birmingham Airport, Birmingham, West Midlands, B26 3QJ

(2) LIVERPOOL AIRPORT LIMITED of Venus Building 1 Old Park Lane, Traffordcity, Manchester M41 7HA

(3) PEEL L&P INVESTMENTS (NORTH) LIMITED of Venus Building 1 Old Park Lane, Traffordcity, Manchester M41 7HA

(4) BRISTOL AIRPORT LIMITED of Lulsgate House, Bristol Airport, Bristol BS48 3DW

(5) SOUTH WEST AIRPORTS LIMITED of Lulsgate House, Bristol Airport, Bristol BS48 3DW

(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED of Lulsgate House, Bristol Airport, Bristol BS48 3DW

SEAL
HIGH COURT OF JUSTICE
06 Aug 2024
QUEEN'S BENCH DIVISION
KB-2024-002473

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

Please refer to Schedule 1 attached to the Claim Form

Brief details of claim

The Claimants seek an injunction to restrain the Defendants from acts of trespass and/or private and/or public nuisance on the land edged red on Plan 1, Plan 2 and Plan 3.

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.

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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

- [x] 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
31	0 7	2 0 2 4

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.

AllyboM/362291.1

Email

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

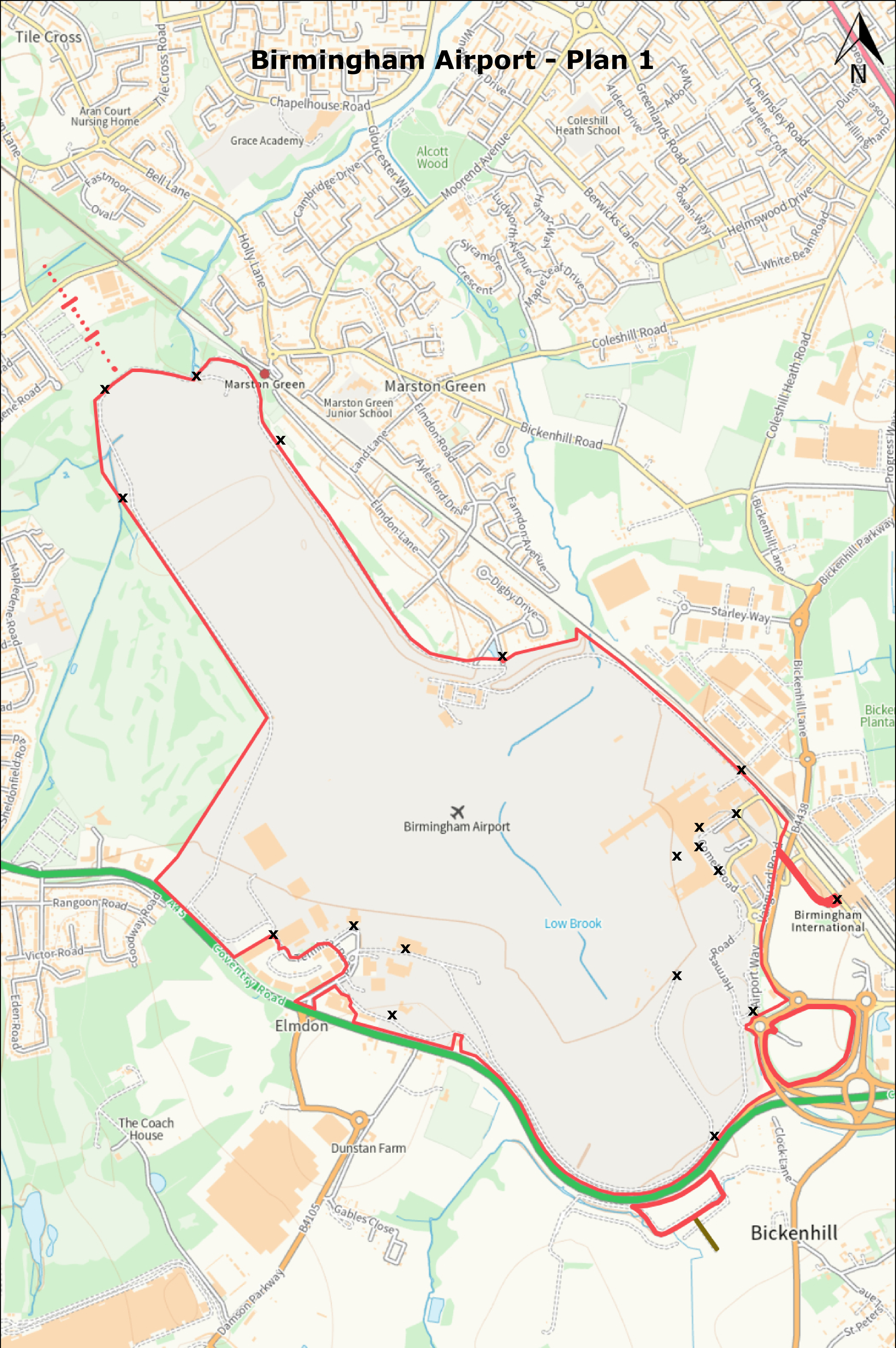
Amended Schedule 1 to Claim Form

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

Birmingham Airport - Plan 1



Birmingham Airport - Plan 1A

N

- 1 (MM18862)
- 2 (MM33687)
- 3 (WK106001)
- 4 (WM210117)
- 5 (WM533742)
- 6 (WM543119)
- 7 (WM580834)
- 8 (WM594837)
- 9 (WM613993)
- 10 (WM474034)
- 11 (WM836251)
- 12 (MM72387)
- 13 (WK2163)
- 14 (WM426768)
- 15 (WM503201)
- 16 (WM964966)
- 17 (WM933796)
- 18 (WM504259)
- 19 (WK8913)
- 20 (MM80239)
- 21 (MM14813)
- 22 (WK106592)
- WM836804
- MM14145
- MM20794
- WM941026
- WM940476
- WM141554
- WM203034
- WM225647
- WM442617
- WM484139
- WM642629
- WM772517
- WM765650
- Injunction

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Birmingham Airport - Plan 1B

- Injunction
- Third Party Areas
- Part Third Party Areas
- BHX Northern Landing Lights
- BHX Southern Landing Lights
- BHX Air Rail Link and Plaform

N

Chelmsley Road
Fordbridge
Chelmsley Wood
Moorend Avenue
Bosworth Drive
Kingshurst Brook
Chapelhouse Road
Alcott Wood
Greenlands Road
Tile Cross Road
Bell Lane
The Radleys
Holly Lane
Alcott Lane
Berwicks Lane
Helmswood Drive
Station Road
Coleshill Road
Marston Green
Bickenhill Road
Coleshill Heath Road
Bickenhill Parkway
Bickenhill Lane
Hatchford Brook
Birmingham Airport
Low Brook
Birmingham International
Coventry Road
Elmdon
B4105
The Coach House
Dunstan Farm
A45
Bickenhill
B4438
Damson Lane
Hampton Coppice
Elmdon Coppice

0 0.5 km 1 km

Ordnance Survey

ORBITAL WITNESS

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Liverpool Airport - Plan 2A

- CH384543
- CH384582
- CH418034
- CH577106
- CH577117
- CH596568
- MS294425
- MS297001
- MS307564
- MS321998
- MS402558
- MS436566
- MS447440
- MS517785

N



ORBITAL WITNESS

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Liverpool Airport - Plan 2B

- Injunction
- Third Party Areas
- Part Third Party Areas
- LJLA Western Landing Lights
- LJLA Eastern Landing Lights
- Public Highways

N

ORBITAL WITNESS

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Bristol Airport - Plan 3A

- ST371655
- ST180919
- ST351064
- ST337957
- ST355226
- ST355723
- ST358635
- ST358637
- ST359557
- ST370506
- ST370508
- ST283749
- ST331855

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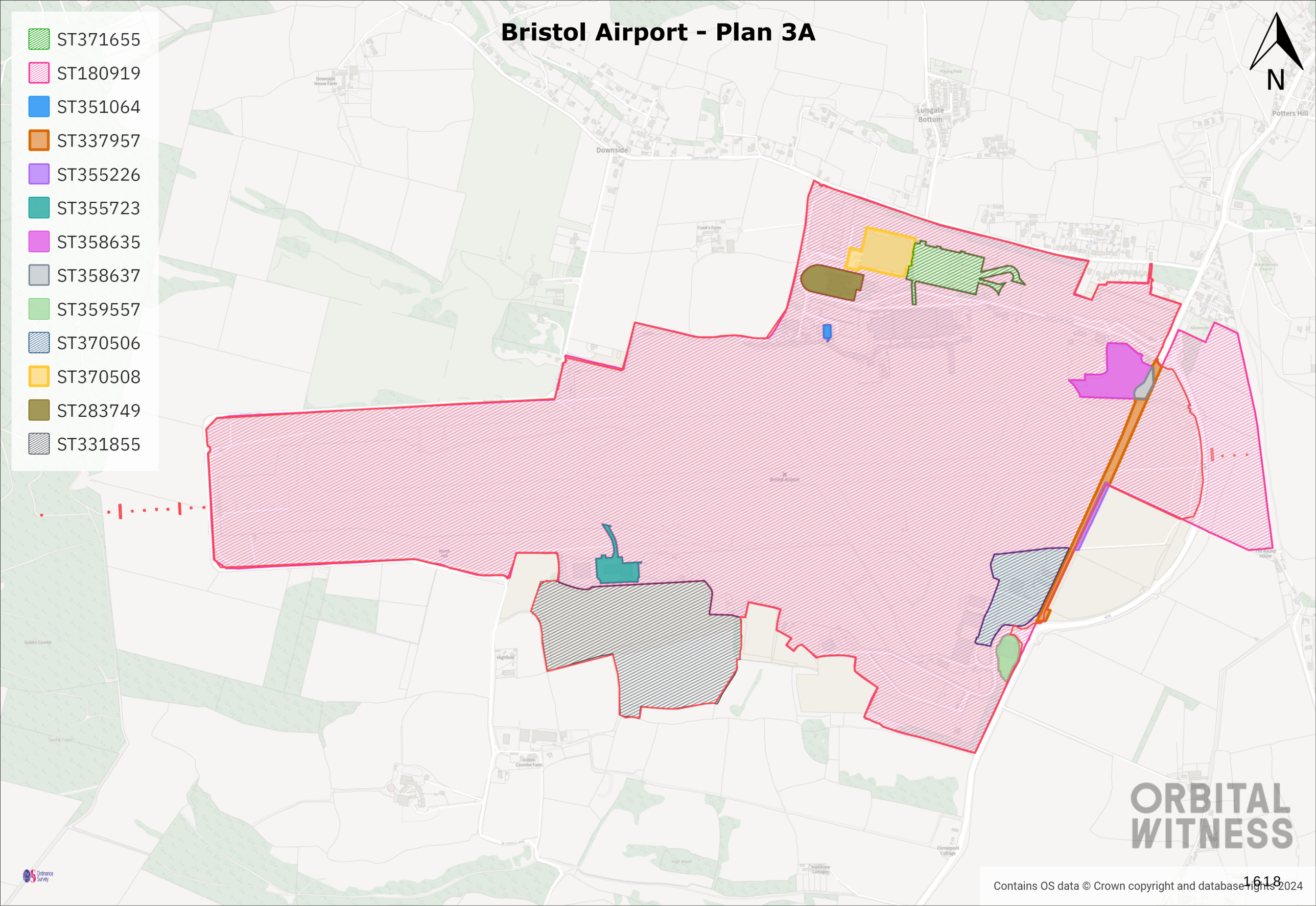

ORBITAL WITNESS

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Bristol Airport - Plan 3B

- Injunction
- Third Party Areas
- Part Third Party Areas
- BRS Western Landing Lights
- BRS Eastern Landing Lights

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ORBITAL WITNESS

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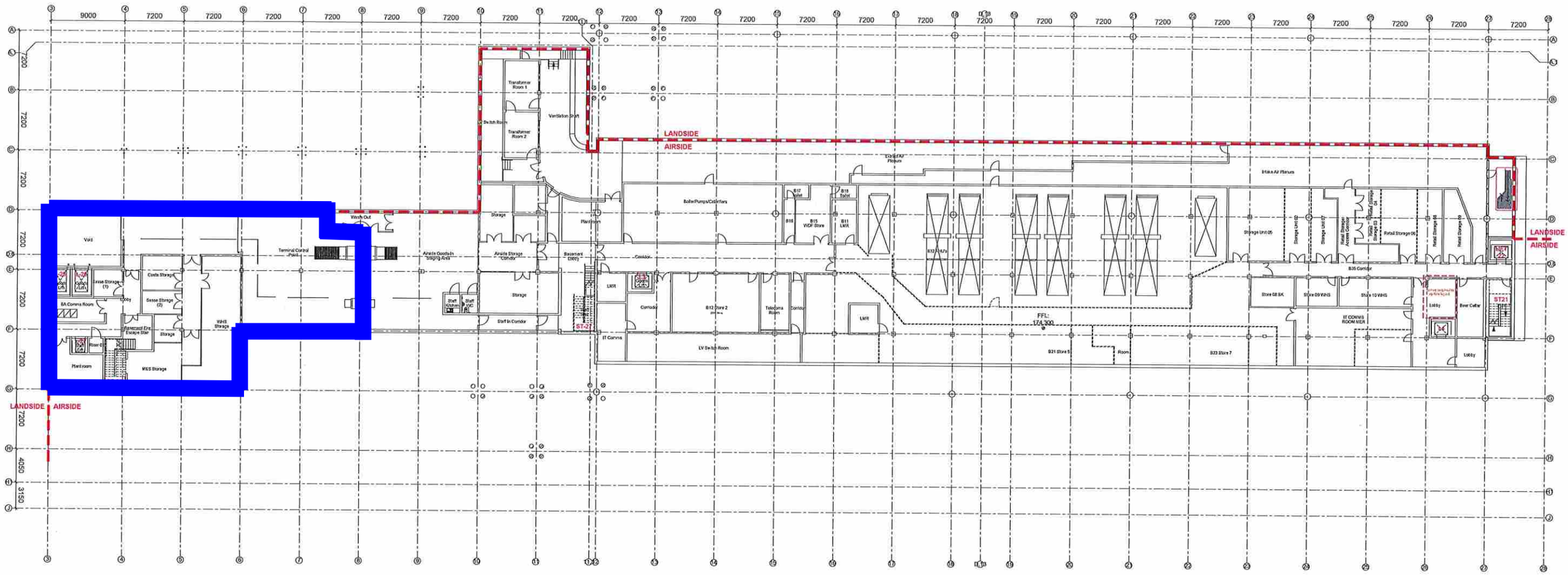
Bristol Airport **Terminal Basement** - Plan 3C



Rev no.	Date:	Amendment	Drawn by:	Ckd'd by:
19	13.05.21	Various updates	EH	EH

www.amp-arch.com

Status: Information	Client: BRISTOL AIRPORT
Date: 13/05/2021	Project Name: BRISTOL AIRPORT CURRENT DRAWINGS
Drawn by: EH / Ckd by: EH	Drawing Title: TERMINAL - EXISTING BASEMENT FLOOR PLAN
Scale: 1:250 / Paper: A0	Drawing No: 11-600 - S2-202 / Revision: 19

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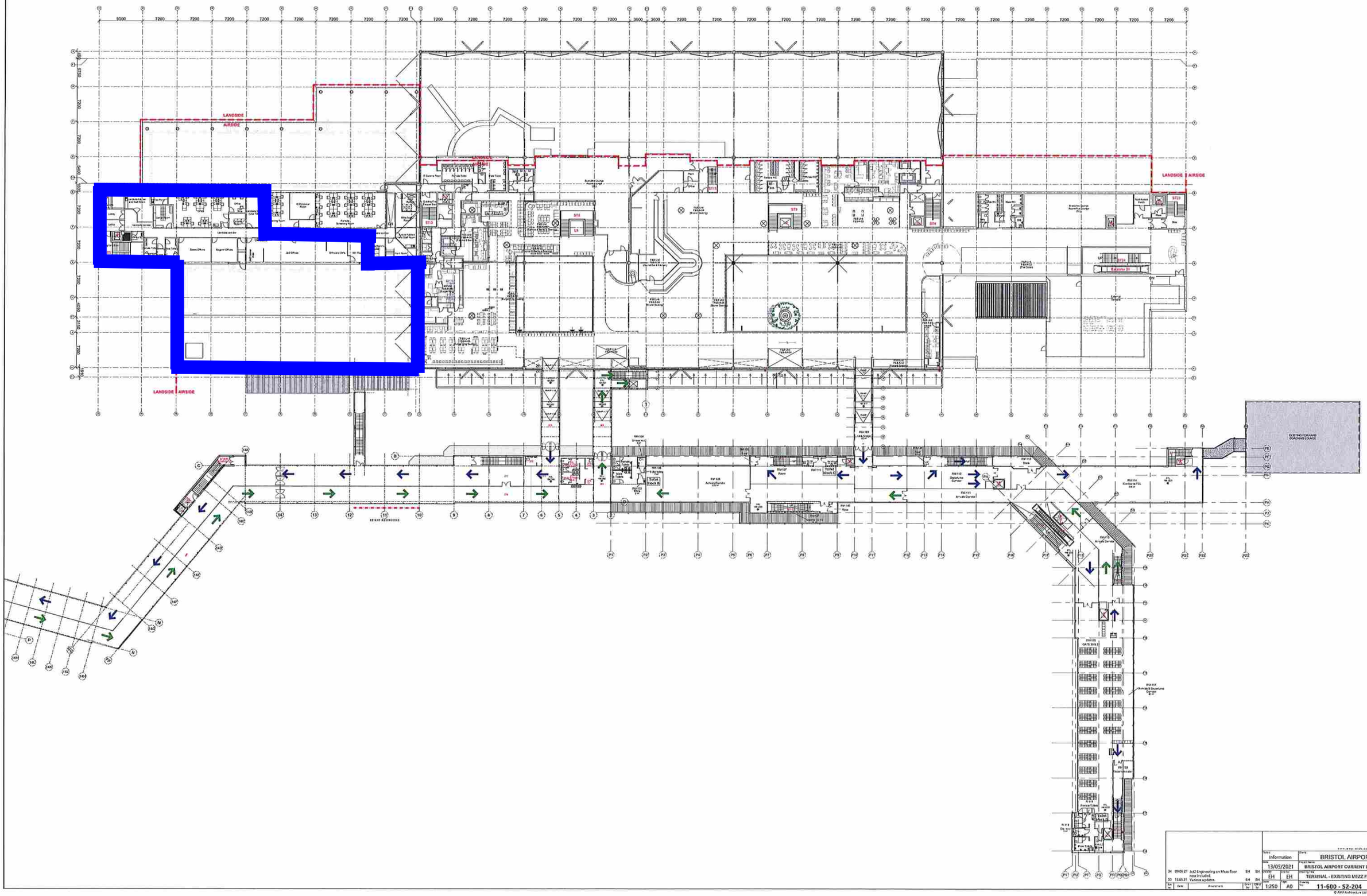
Bristol Airport Terminal **Mezzanine** - Plan 3**D**



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		Date: 13/05/2021	Project Name: BRISTOL AIRPORT CURRENT DRAWINGS
		Drawn: EH	Check: EH
		Scale: 1:250	Size: A0
			Drawing Title: TERMINAL - EXISTING MEZZ FLOOR PLAN
			Drawing No: 11-600 - S2-204
34	09.09.21	JoJ Engineering on Mezz floor now included.	EH EH
33	13.05.21	Various updates.	EH EH
Rev No.	Date	Amendments	Drawn by Check by

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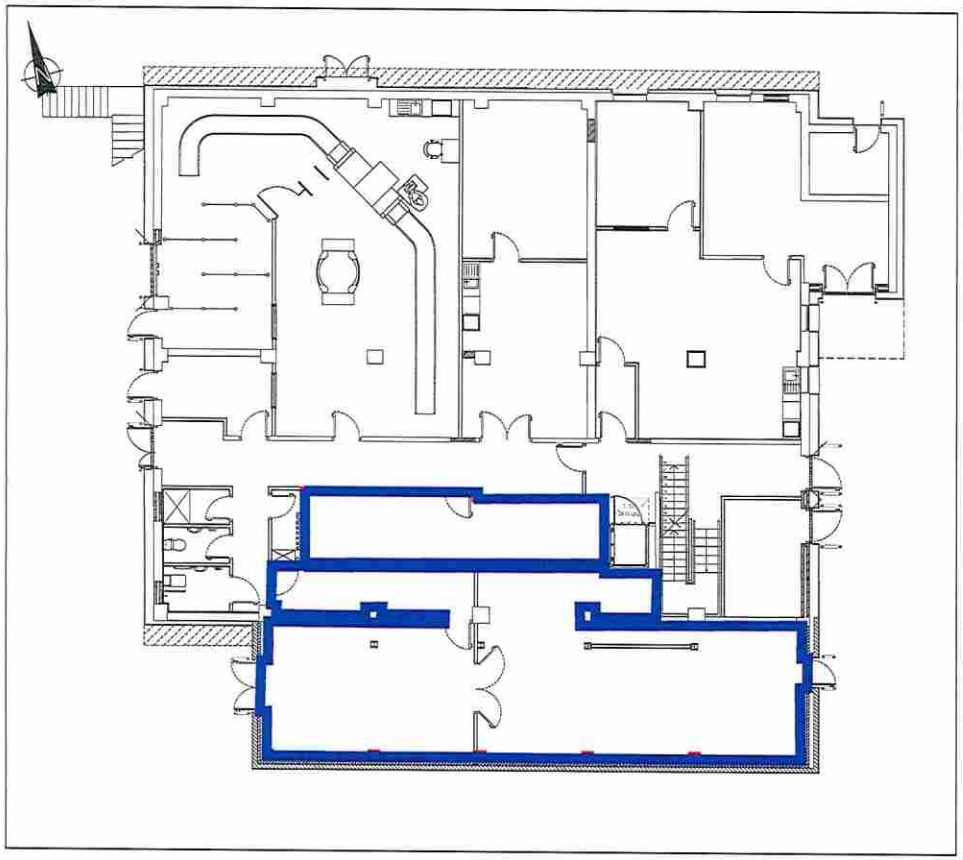
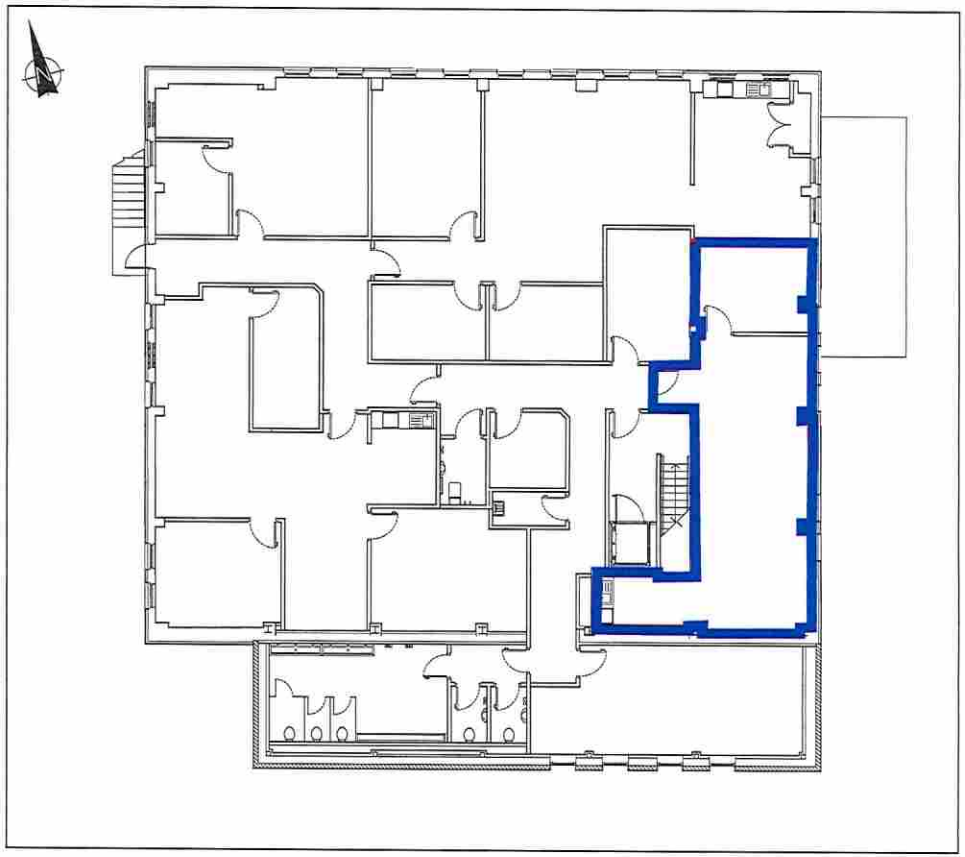
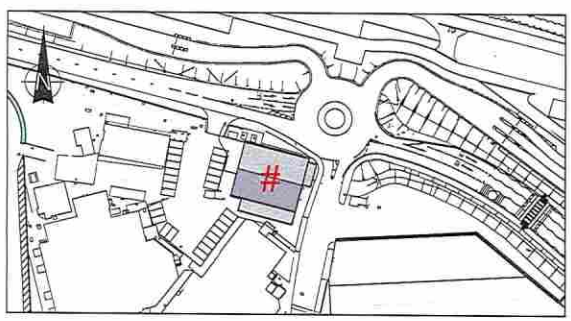
Bristol Airport **Northside House** - Plan 3**E**



LEASE PLAN - NSH GROUND FLOOR LEVEL
Scale 1:250



LEASE PLAN - NSH FIRST FLOOR LEVEL
Scale 1:250



SITE REFERENCE PLAN
Scale 1:2500

KEY

DENOTES LEASE DEMISE

TOTAL DEMISE AREA: **195.5m²**

\# DENOTES NORTHSIDE HOUSE (NSH) LOCATION

Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:

TODD ARCHITECTS
2ND FLOOR TITANIC HOUSE,
6 QUEENS ROAD, BELFAST
BT3 9DT,
T +44 (0) 28 9024 5587,
E INFO@TODDARCH.CO.UK

TODD

Status: INFORMATION	Client: BRISTOL AIRPORT
Date: 30/04/2019	Project Name: **NORTHSIDE HOUSE REFURB**
Dwn by: MM / Ckd by: EH	Drawing Title: SR TECHNICS
Scale: VARIES / Page: A4	Drawing No: **18034 - LE2-01** / Revision: **0**

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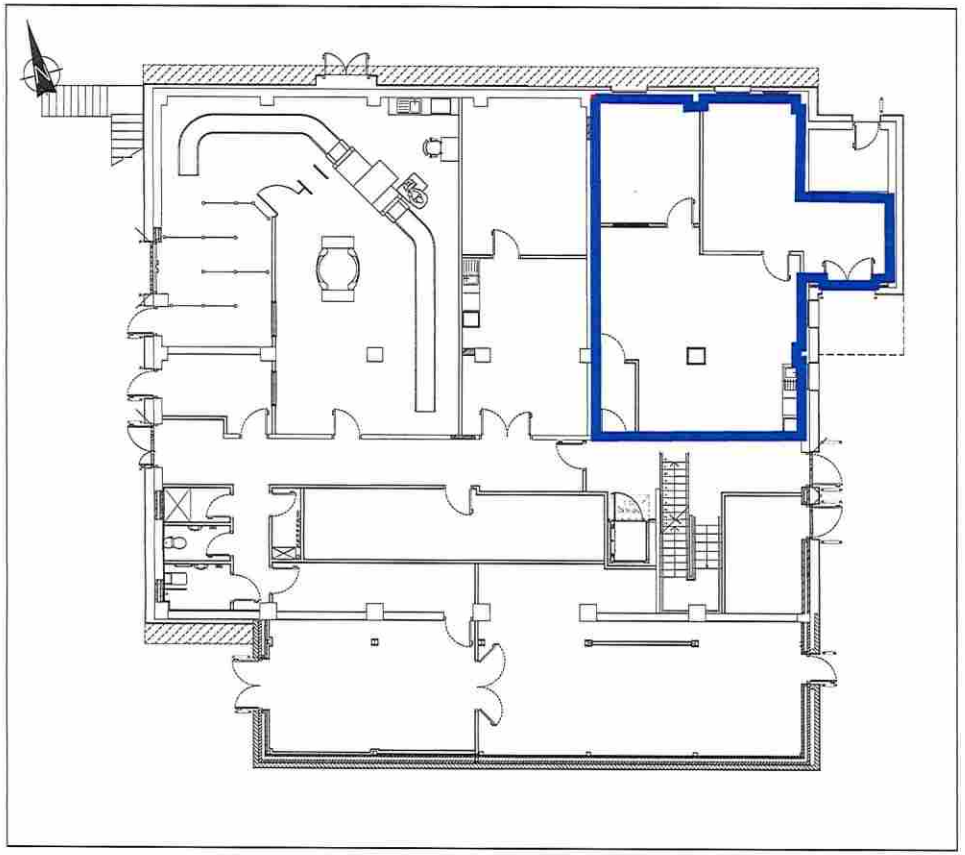
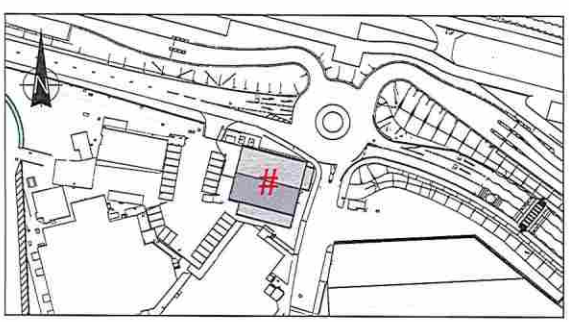
Bristol Airport Northside House - Plan 3F



LEASE PLAN - NSH GROUND FLOOR LEVEL

Scale 1:250



SITE REFERENCE PLAN

Scale 1:2500

KEY

DENOTES LEASE DEMISE

TOTAL DEMISE AREA: **91.7m²**

\# DENOTES NORTHSIDE HOUSE (NSH) LOCATION

Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:

TODD ARCHITECTS
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TODD

Status: INFORMATION	Client: BRISTOL AIRPORT
Date: 30/04/2019	Project Name: **NORTHSIDE HOUSE REFURB**
Dwn by: MM / Ckd by: EH	Drawing Title: TUI
Scale: VARIES / Page: A4	Drawing No: **18034 - LE2-03** / Revision: **0**

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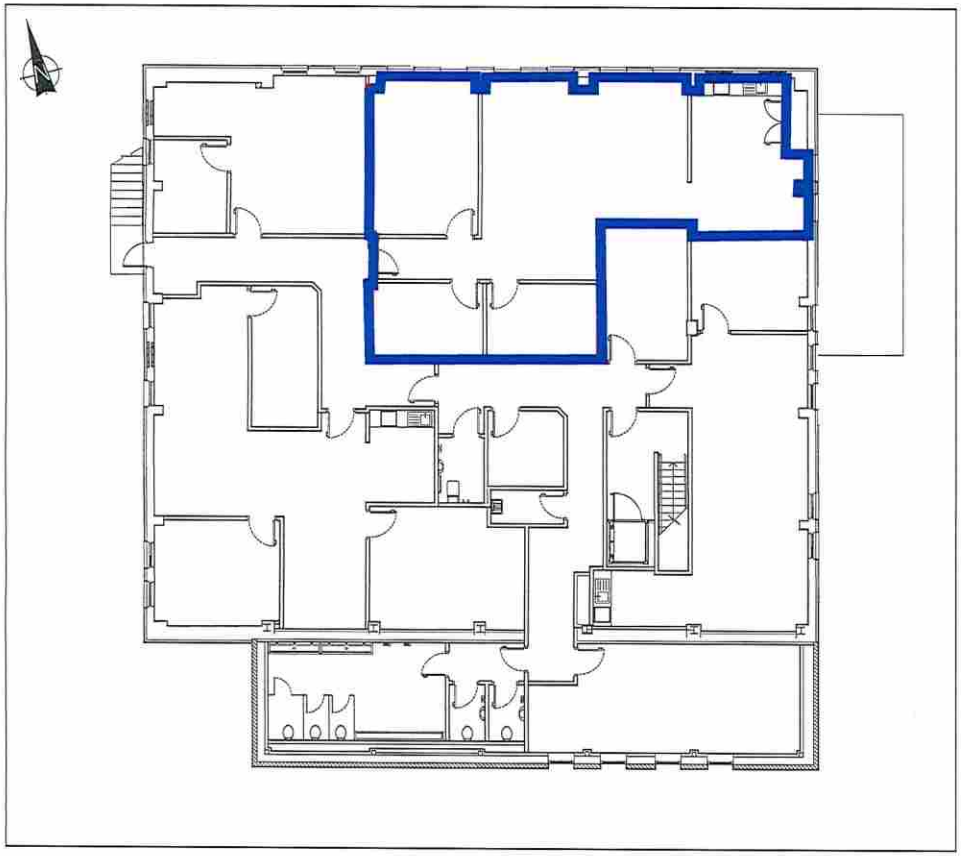
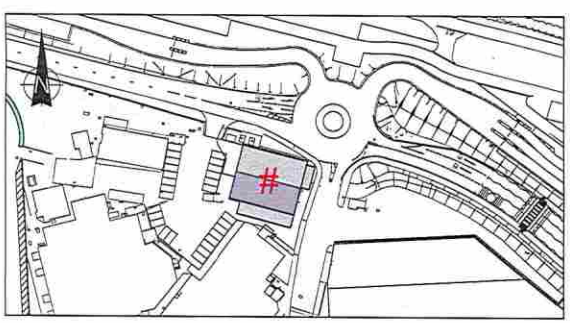
Bristol Airport Northside House - Plan 3G



LEASE PLAN - NSH FIRST FLOOR LEVEL

Scale 1:250



SITE REFERENCE PLAN

Scale 1:2500

KEY

DENOTES LEASE DEMISE

TOTAL DEMISE AREA: **112.3m²**

\# DENOTES NORTHSIDE HOUSE (NSH) LOCATION

Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:

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TODD

Status: INFORMATION	Client: BRISTOL AIRPORT
Date: 30/04/2019	Project Name: **NORTHSIDE HOUSE REFURB**
Dwn by: MM / Ckd by: EH	Drawing Title: SWISSPORT
Scale: VARIES / Page: A4	Drawing No: **18034 - LE2-05** / Revision: **0**

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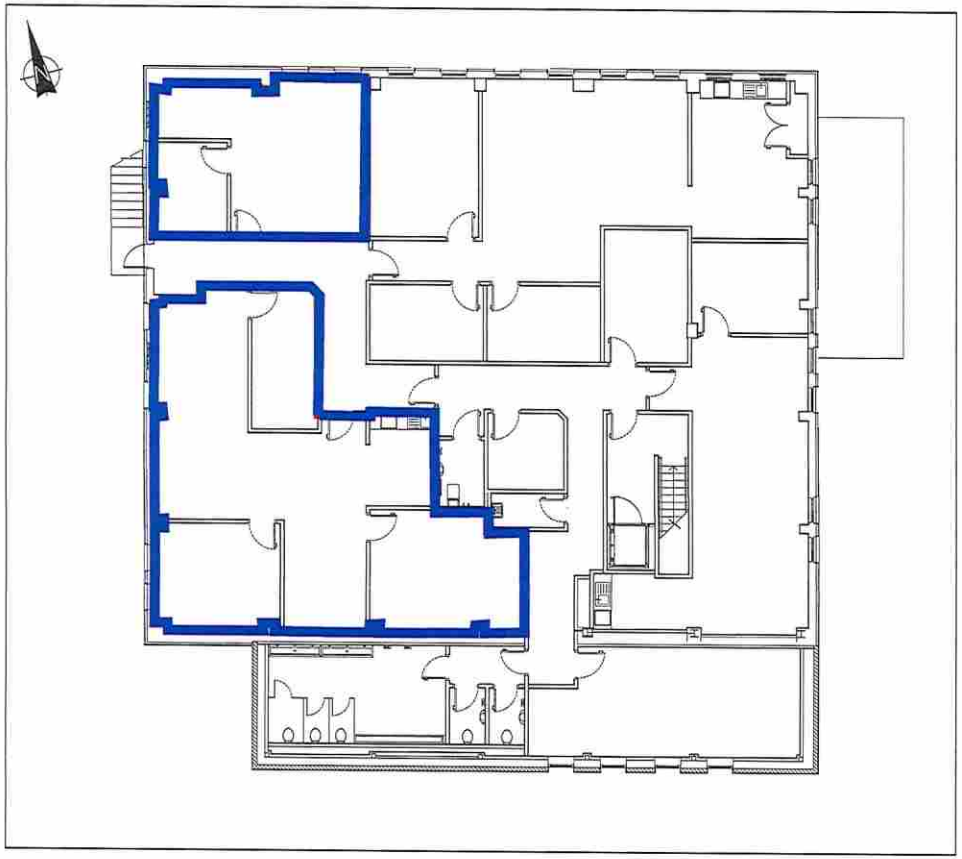
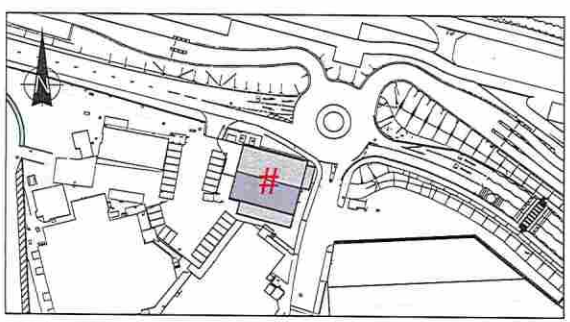
Bristol Airport Northside House - Plan 3**H**



LEASE PLAN - NSH FIRST FLOOR LEVEL

Scale 1:250



SITE REFERENCE PLAN

Scale 1:2500

KEY

DENOTES LEASE DEMISE

TOTAL DEMISE AREA: **147m²**

\# DENOTES NORTHSIDE HOUSE (NSH) LOCATION

Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:

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TODD

Status: INFORMATION	Client: BRISTOL AIRPORT
Date: 30/04/2019	Project Name: **NORTHSIDE HOUSE REFURB**
Dwn by: MM / Ckd by: EH	Drawing Title: easyJet (DHL)
Scale: VARIES / Page: A4	Drawing No: **18034 - LE2-04** / Revision: **0**

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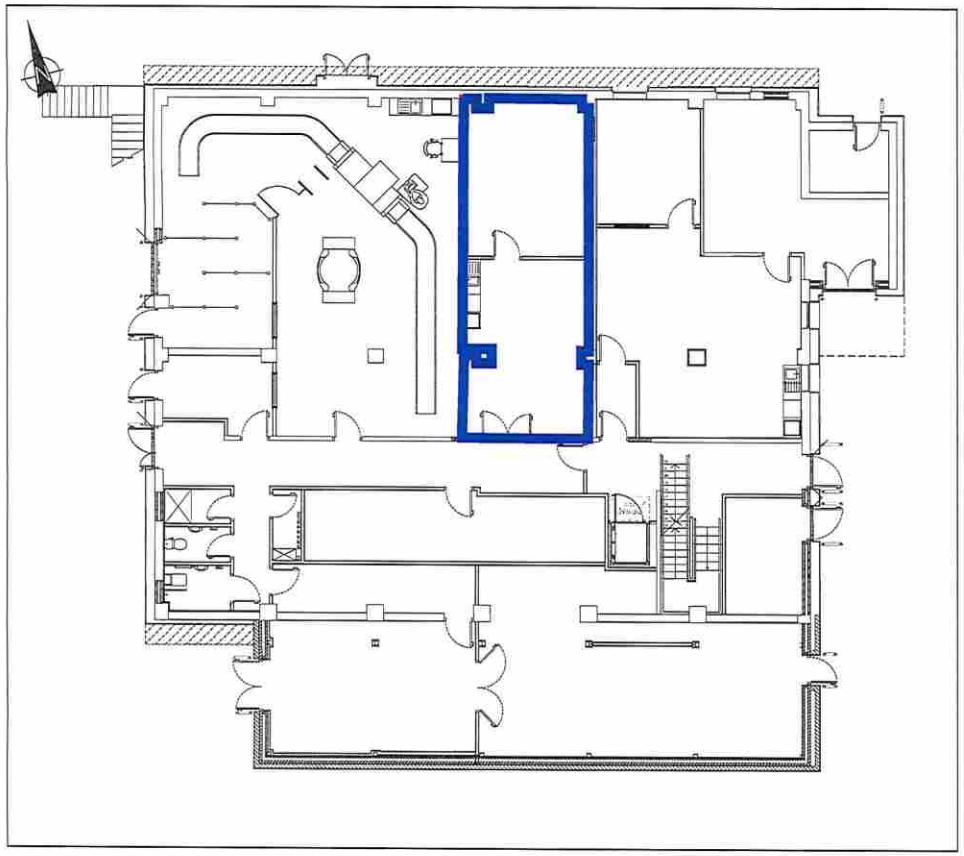
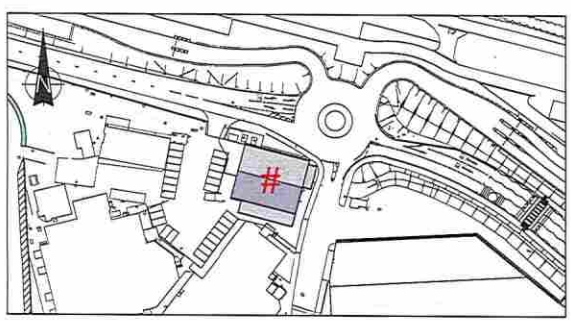
Bristol Airport Northside House - Plan 3I



LEASE PLAN - NSH GROUND FLOOR LEVEL

Scale 1:250



SITE REFERENCE PLAN

Scale 1:2500

KEY

DENOTES LEASE DEMISE

TOTAL DEMISE AREA: **49.7m²**

\# DENOTES NORTHSIDE HOUSE (NSH) LOCATION

Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:

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TODD

Status: INFORMATION	Client: BRISTOL AIRPORT
Date: 30/04/2019	Project Name: **NORTHSIDE HOUSE REFURB**
Dwn by: MM / Ckd by: EH	Drawing Title: MORSON
Scale: VARIES / Page: A4	Drawing No: **18034 - LE2-02** / Revision: **0**

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Amended pursuant to CPR 17.1(1)

CLAIM NO: KB – 2024 -002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

~~(1)~~ PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

Defendants

AMENDED PARTICULARS OF CLAIM

Birmingham Airport

1. The First Claimant is the operator of Birmingham Airport, located in Airport Way, Birmingham B26 3QJ, shown edged in red on Plan 1 ("**BHX**"). BHX serves around 11.8 million travelling passengers each year with an annual revenue of approximately £152 million.

2. With the exception of the parcels of land referred to in paragraph 9, the First Claimant is the registered proprietor of all of the land on which BHX is situated as shown in red on Plan 1, through the interests shown in the Title Schedule and on Plan 1A attached hereto - but subject to the interests referred to in paragraph 4.

3. Subject to the aforesaid interests, the First Claimant is entitled to an immediate right of possession occupation and control of BHX by virtue of its titles as shown in the Title Schedule and on Plan 1A.

4. Plan 1B identifies the areas within BHX over which the First Claimant lacks (or does not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests ("**the BHX Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First Claimant does not assert that it is the person with an immediate right of occupation or possession.

5. The BHX Third Party Areas are coloured blue and green on Plan 1B. The blue colouring indicates areas within BHX which are the subject of leases. The green colouring indicates parts of BHX which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

6. There are five areas coloured blue on Plan 1B (numbered 1-5) each of which directly abuts the red line boundary of BHX. In each of those locations, the boundary of BHX is not in the possession or control of the First Claimant.

7. With those exceptions, access to or from the BHX Third Party Areas by the public from outside the airport, necessarily involves the use of areas of BHX which remain unencumbered by any such arrangement and in relation to which, accordingly, the First Claimant remains entitled to possession occupation and control by virtue of their interests shown in the Title Schedule and on Plan 1A.

8. Within the BHX red line boundary, there are 3 parcels in respect of which the First Claimant is not the registered proprietor:-

    a. although the land on which the northern landing lights (coloured orange on Plan 1B) are situated is registered in the name of a third party company, the First Claimant asserts that it is entitled to the immediate right of occupation or possession of those lights and the structure which supports them. Some of the lights and some parts of the structure have been in place since around 1967 and others since 2008. All of the lights and structures have been maintained by the First Claimant or its predecessors throughout that period;

    b. on the south western boundary is an unregistered strip of land (coloured bright green on Plan 1A but omitted from the key on that plan) in respect of which the First Claimant asserts that it is entitled to the immediate right of occupation or possession; and

    c. on the eastern boundary is an Air Rail Link and an associated platform and station. By an agreement for lease dated 1 April 2013, Network Rail Infrastructure Limited agreed to grant and the First Claimant (then known as Birmingham International Airport Limited) agreed to take a lease of the land coloured purple on Plan 1B for a term of 199 years. The lease has not been completed but the First Claimant asserts that it is entitled to the immediate right of occupation or possession of the land coloured purple.

9. By virtue of s 63 of the Airports Act 1996, the First Claimant has power to make byelaws with respect to BHX. Pursuant to the Birmingham Airport Limited Byelaws 2021, byelaw 3.32, no person has a right to use any part of BHX as defined therein for demonstrations or public assemble which is likely to obstruct or interfere with the proper use of the airport or the safety or security of passengers or persons using the airport. The plan which defines BHX for the purposes of the byelaws does not extend to the landing lights. Apart from that, it includes all the land edged in red on Plan 1.

Liverpool Airport

10. The Second Claimant is the operator of Liverpool Airport, located in Speke Hall Avenue, Speke, Liverpool L24 1YD, shown edged in red on Plan 2 ("**LJLA**"). LJLA serves around 5 million travelling passengers each year with an annual revenue of approximately £35 million.

11. The Second Claimant is the proprietor of the land on which LJLA is situated as shown in red on Plan 2, through the interests shown in the Title Schedule and Plan 2A attached hereto - but subject to the interests referred to in paragraph 14.

12. The Third Claimant has been joined to the proceedings as it is the registered proprietor of the land on which the western landing lights (coloured brown on Plan 2B) are situated, which is registered under Title Number MS575438.

13. Subject to the aforesaid interests, the Second Claimant (and the Third Claimant in respect of the western landing lights) is entitled to an immediate right of possession occupation and control of LJLA, by virtue of its titles as shown in the Title Schedule and Plan 2A.

14. Plan 2B identifies the areas within LJLA over which the Second Claimant lacks (or does not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the LJLA Third Party Areas**") or public rights of way ("**the LJLA Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Second Claimant does not assert that it is the person with an immediate right of occupation or possession.

15. The LJLA Third Party Areas are coloured blue and green on Plan 2B. The blue colouring indicates areas within LJLA which are the subject of leases. The green colouring indicates parts of LJLA which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

16. The LJLA Highways are indicated in pink on Plan 2B. These provide access to LJLA to the Second Claimant and its licensees (including members of the public).

17. Access to or from the LJLA Third Party Areas by the public from outside the airport, necessarily involves the use of areas of LJLA which remain unencumbered by any such arrangement and in relation to which, accordingly, the Second Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule and on Plan 2A.

18. All except 2 of the eastern landing lights (coloured orange on Plan 2B) are situated on title numbers CH596568 and CH384543 in respect of which the Second Claimant is the registered proprietor. The Second Claimant asserts that it is entitled to the

immediate right of occupation or possession of the other 2 landing lights and the structure which supports them which are situated on unregistered land. The lights and the structure which supports them have been in this location since around 1960 and they have been maintained by the Second Claimant or its predecessors throughout that period.

19. By virtue of s 63 of the Airports Act 1996, the Second Claimant has power to make byelaws with respect to LJLA. Pursuant to the Liverpool John Lennon Airport Byelaws 2022, byelaw 2.18, no person has a right to use any part of LJLA for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the landing lights, the plan which defines LJLA for the purposes of the byelaws includes all of the land edged in red on Plan 2.

Bristol Airport

20. The Fourth Claimant is the operator of Bristol Airport, located in Bristol BS48 3DY, shown edged in red on Plan 3 ("**BRS**"). BRS serves around 10 million travelling passengers each year with an annual revenue of approximately £179 million.

21. The Fourth, Fifth and Sixth Claimants are the proprietors of the land on which BRS is situated as shown in red on Plan 3, through the interests shown in the Title Schedule and Plan 3A hereto - but subject to the interests referred to in paragraph 23.

22. Subject to the aforesaid interests, the Fourth, Fifth and Sixth Claimants are entitled to an immediate right of possession occupation and control of BRS, by virtue of its titles as shown in the Title Schedule and Plan 3A.

23. Plan 3B identifies the areas within BRS over which the Fourth, Fifth and Sixth Claimants lack (or do not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the BRS Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fourth, Fifth and Sixth Claimants do not assert that they are the person with an immediate right of occupation or possession.

24. The BRS Third Party Areas are coloured blue and green on Plan 3B. The blue colouring indicates areas within BRS which are the subject of leases. The green colouring indicates parts of BRS which include such areas. By way of example, the

blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

25. Access to or from the BRS Third Party Areas by the public from outside the airport, necessarily involves the use of areas of BRS which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fourth, Fifth and Sixth Claimants remain entitled to possession occupation and control by virtue of its interests shown in the Title Schedule and on Plan 3A.

26. Although the land on which the western landing lights (coloured brown on Plan 3B) are situated is registered in the name of a third party individual, the Fourth Claimant asserts that it is entitled to the immediate right of occupation or possession of those lights and the structure which supports them. The lights and structure have been in place since around 2004 and have been maintained by the Fourth Claimant or its predecessors throughout that period.

27. By virtue of s63 of the Airports Act 1996, the Fourth Claimant has power to make byelaws with respect to BRS. Pursuant to the Bristol Airport Byelaws 2012, byelaw 4.17, no person has a right to organise or take part in any protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the landing lights, the plan which defines BRS for the purposes of the byelaws includes all the land outlined in red on Plan 3.

The Claimants' claims

28. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management / airline facilities and (in the case of BHX) the Air Rail Link railway.

29. In relation to each airport:

    a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at

the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).

b. No wider consent subsists; and (subject to the highways described above) no public right of access, or way, subsists over the airports.

c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.

d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

30. In relation to the Third Party Areas at each airport:

a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the Court to make an order which does not distinguish between the airports generally (as shown outlined in red on the various plans) and the Third Party Areas within them; and

b. Further or alternatively, protest which occurs on the Third Party Areas interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.

a. The like considerations apply in in relation to those of the landing lights not in the outright possession of the Claimants.

31. Further, in respect of the LJLA Highways described above: protest which occurs on these highways interferes and/or threatens to interfere:

b. Unreasonably and substantially, with the Second and Third Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;

c. Unreasonably and substantially, with (and/or to obstruct or hinder) the free passage along the highway, occasioning particular damage to the Second and Third Claimants; and

d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the byelaws.

The threats

32. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:

33. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations…"

34. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").

35. 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.

36. Since that 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?"

37. 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?"

38. 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****.*

…"

39. 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.

[1] As of 29 July 2024, £24,519 had been raised on this website.

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/tZIoduqpqTMtE9dgMMhlaymvEZgO45jgJ19A)

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,

Just Stop Oil"

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

41. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at London Stansted Airport (in an area which is subject to an occupational arrangement with a third party), as part of a series of protests on climate change. This included:

    a. an individual using an angle grinder to cut a hole in the perimeter fence of the airport;

    b. two individuals trespassing the perimeter fence; and

    c. spray painting two aircrafts orange using a fire extinguisher.

42. As a result of this direct action:

    a. It was necessary to suspend operations on the runway at Stansted Airport for approximately 50 minutes.

    b. the two individuals (known as Jenifer Kowalski and Cole Macdonald) were arrested and charged with causing criminal damage, aggravated trespass and interference with the use or operation of national infrastructure.

43. On 25 June 2024, six JSO activists were arrested at Gatwick Airport and were found to be carrying luggage containing a large number of bandages thought to have been intended to interfere with jet engines or to block lavatories.

44. On 27 June 2024, six JSO activists were arrested by the Metropolitan Police whilst attending an event organised by JSO.

45. On 29 June 2024, JSO sent an email to subscribers in the following terms:-

> *"**Since Tuesday, 31 supporters of Just Stop Oil have now been arrested** for possessing the strong convictions that governments and corporations do not have the right to prioritise oil profits over the safety and wellbeing of our loved-ones, communities and the many millions already suffering the effects of runaway climate breakdown.*
>
> *In a sane society, it would be those who are setting the stage for an end to ordered society that would be having their doors barged down and dragged into the back of a police van to be interrogated about the catastrophic criminal damages they are imposing on every living thing and on every future generation. Instead, it is ordinary people- mothers, grandparents and young people who are having their futures stolen from them, that the police come for.*
>
> ***The incoherent pattern of arrests we have seen over the last 24 hours suggests a rattled system**. They know that as climate breakdown intensifies, civil unrest will increase and one day there will not be enough police to cope with the millions stepping into action, as the full betrayal of the political establishment becomes clearer.*
>
> ***We will not be intimidated by the death throes of a broken system**. Nothing the state can throw at us is worse than the realities that will be imposed on all of us if the breakdown of our climate carries on unabated. We WILL be stepping into action in the summer because when the lives of your family are at risk, there is no other choice than to protect them…"*

46. On 24 July 2024, a further ten JSO activists were arrested at Heathrow Airport following an intelligence led operation. According to media reports, some of those arrested were found to be carrying cutting gear and glue.

47. On 28 July 2024, a further eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with national infrastructure.

48. On 29 July 2024, a further two JSO activists were arrested at Heathrow Airport after spraying orange paint around the entrance hall to Terminal 5.

49. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for BHX, LJLA and/or BRS:

    c. trespass on the airports and/or

    d. by protest conducted on or from the Third Party Areas and/or on or from the land on which the landing lights (which are not within the Byelaw plans) are situate, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or

    e. by protest conducted on or from the highways, obstruct those occasioning particular damage to the Claimants and/or interfere with the Claimants' right of access to the airports via those highways, so as to cause a nuisance actionable by the Claimants.

50. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.

51. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:

52. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.

53. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive — by which point harm may already have occurred.

54. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.

55. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.

56. The airports in the present case are all the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the Claimants are fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the Byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at Stansted Airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.

57. Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.

58. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND THE FIRST CLAIMANT CLAIMS AGAINST THE FIRST DEFENDANT:

(1) Subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months or such other period as the Court may determine,

an order that the First Defendants must not, without the consent of the First Claimant enter, occupy or remain upon the land outlined in red on Plan 1.

AND THE SECOND AND THIRD CLAIMANTS CLAIM AS AGAINST THE SECOND DEFENDANT:

(2) Subject to periodic review by the Court on application by the Second and Third Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent of the Second and Third Claimant, enter, occupy or remain upon the land outlined in red on Plan 2.

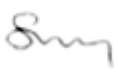
AND THE FOURTH, FIFTH AND SIXTH CLAIMANTS CLAIM AGAINST THE THIRD DEFENDANT:

(3) Subject to periodic review by the Court on application by the Fourth, Fifth and Sixth Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Third Defendants must not, without the consent of the Fourth, Fifth and Sixth Claimants (or either of them), enter, occupy or remain upon the land outlined in red on Plan 3.

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

Dated: 31 July 2024

Birmingham Airport - Plan 1A

N

- 1 (MM18862)
- 2 (MM33687)
- 3 (WK106001)
- 4 (WM210117)
- 5 (WM533742)
- 6 (WM543119)
- 7 (WM580834)
- 8 (WM594837)
- 9 (WM613993)
- 10 (WM474034)
- 11 (WM836251)
- 12 (MM72387)
- 13 (WK2163)
- 14 (WM426768)
- 15 (WM503201)
- 16 (WM964966)
- 17 (WM933796)
- 18 (WM504259)
- 19 (WK8913)
- 20 (MM80239)
- 21 (MM14813)
- 22 (WK106592)
- WM836804
- MM14145
- MM20794
- WM941026
- WM940476
- WM141554
- WM203034
- WM225647
- WM442617
- WM484139
- WM642629
- WM772517
- WM765650
- Injunction

Birmingham Airport - Plan 1B

- Injunction
- Third Party Areas
- Part Third Party Areas
- BHX Northern Landing Lights
- BHX Southern Landing Lights
- BHX Air Rail Link and Plaform

N

0 0.5 km 1 km

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Liverpool Airport - Plan 2A

- CH384543
- CH384582
- CH418034
- CH577106
- CH577117
- CH596568
- MS294425
- MS297001
- MS307564
- MS321998
- MS402558
- MS436566
- MS447440
- MS517785

N

ORBITAL WITNESS

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Liverpool Airport - Plan 2B

- Injunction
- Third Party Areas
- Part Third Party Areas
- LJLA Western Landing Lights
- LJLA Eastern Landing Lights
- Public Highways

N

ORBITAL WITNESS

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Bristol Airport - Plan 3A

- ST371655
- ST180919
- ST351064
- ST337957
- ST355226
- ST355723
- ST358635
- ST358637
- ST359557
- ST370506
- ST370508
- ST283749
- ST331855

N

ORBITAL WITNESS

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Bristol Airport - Plan 3B

- Injunction
- Third Party Areas
- Part Third Party Areas
- BRS Western Landing Lights
- BRS Eastern Landing Lights

N

ORBITAL WITNESS

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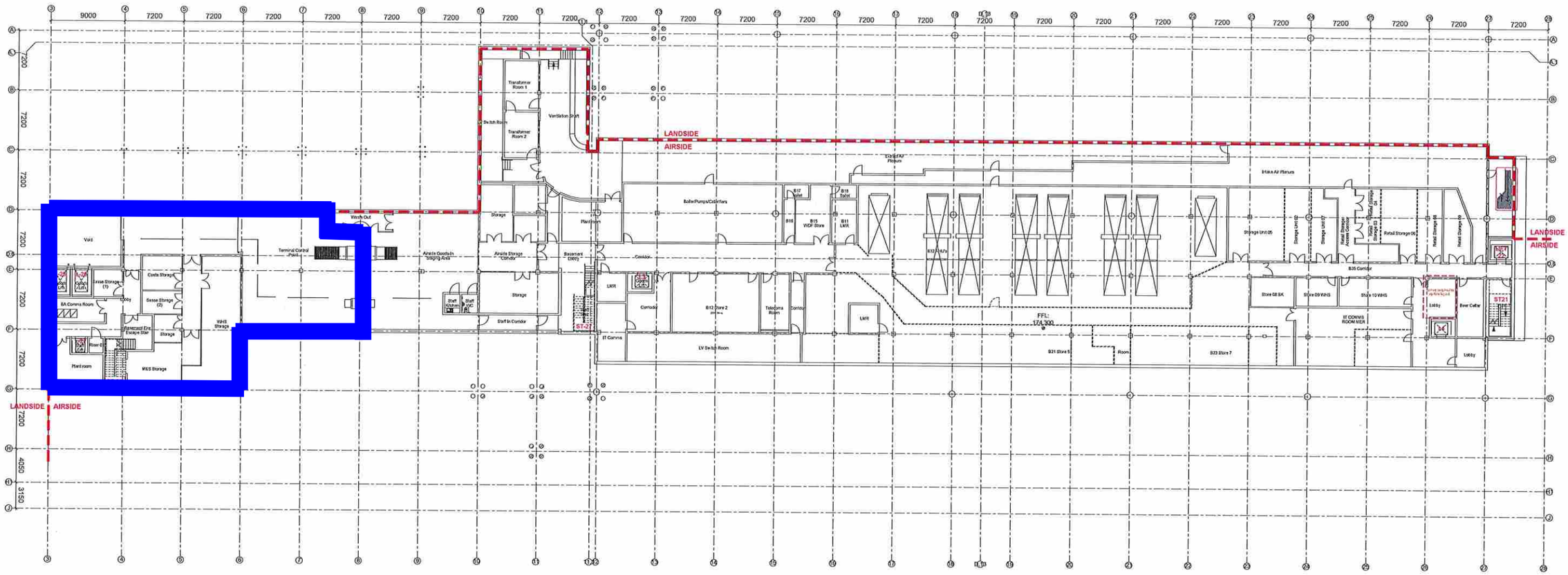
Bristol Airport **Terminal Basement** - Plan 3C



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					Date: 13/05/2021	Project Name: BRISTOL AIRPORT CURRENT DRAWINGS	
					Own by: EH	Ckd by: EH	Drawing Title: TERMINAL - EXISTING BASEMENT FLOOR PLAN
					Scale: 1:250	Page: A0	Drawing No: 11-600 - S2-202
Rev no.	Date:	Amendment	Drwn by:	Ckd by:			Revision: 19
19	13.05.21	Various updates	EH	EH			

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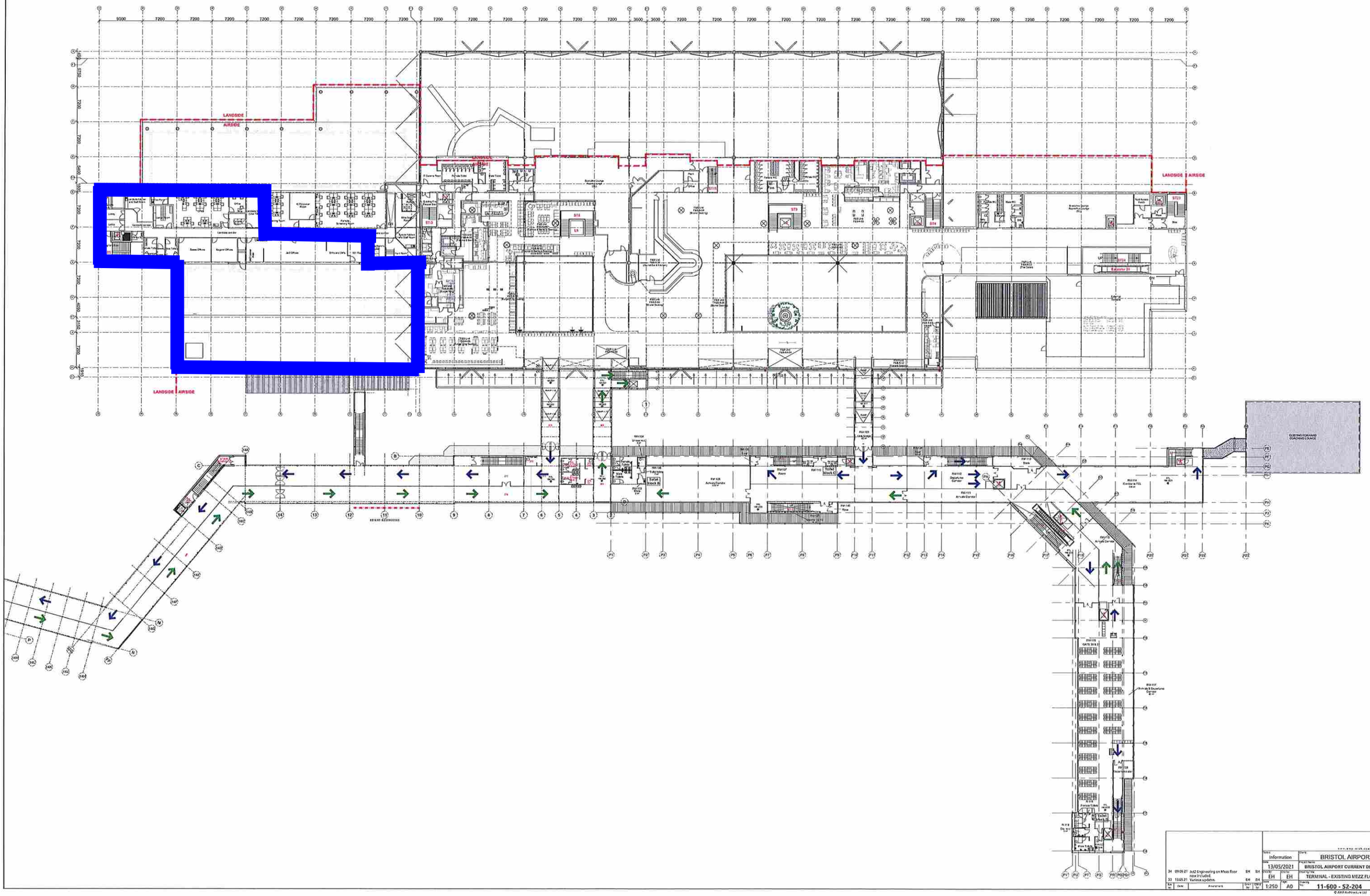
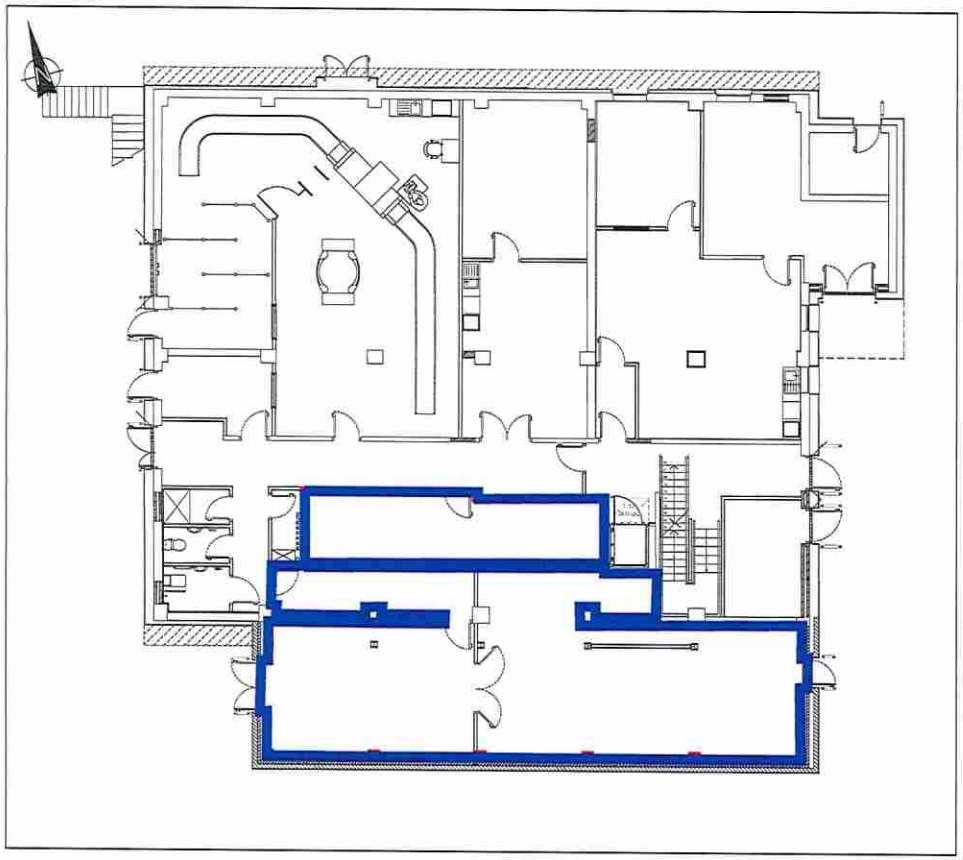
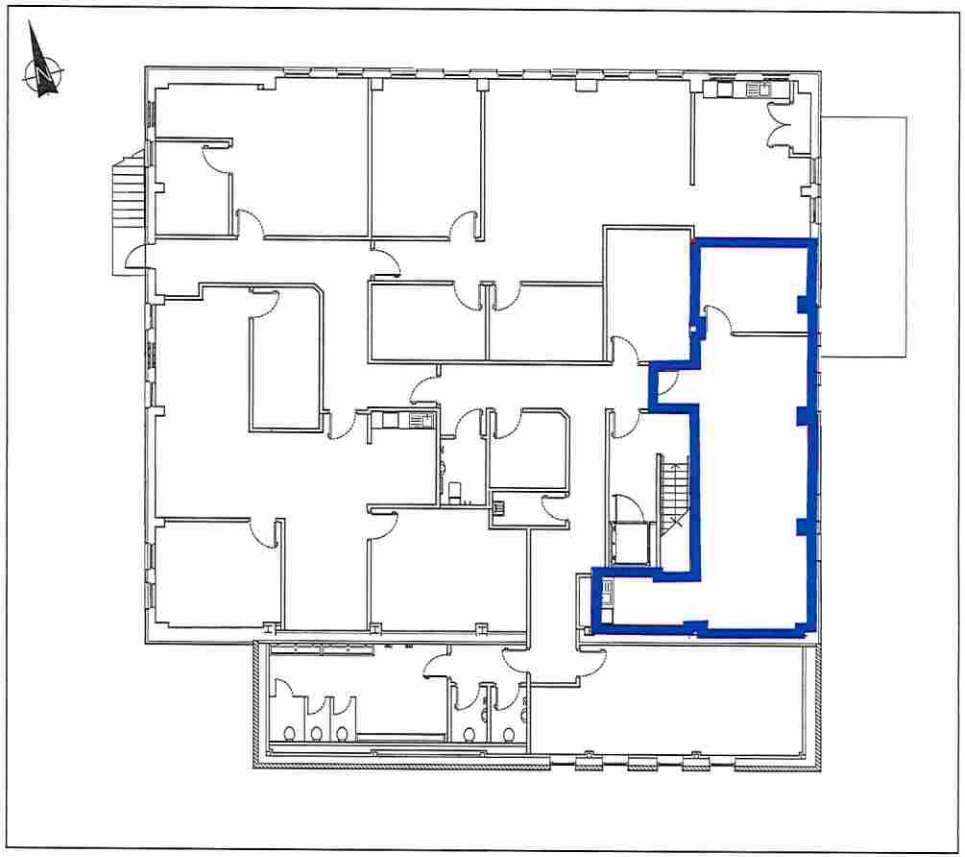
Bristol Airport Terminal **Mezzanine** - Plan 3**D**



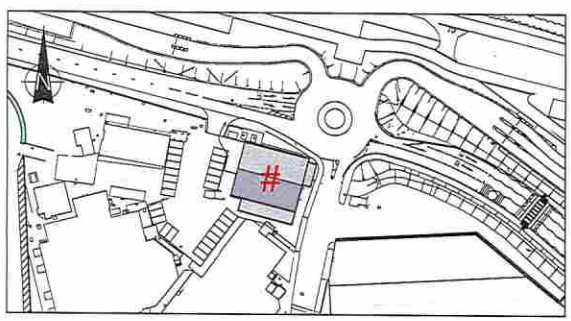
Bristol Airport **Northside House** - Plan 3**E**



LEASE PLAN - NSH GROUND FLOOR LEVEL
Scale 1:250



LEASE PLAN - NSH FIRST FLOOR LEVEL
Scale 1:250



SITE REFERENCE PLAN
Scale 1:2500

KEY

DENOTES LEASE DEMISE

TOTAL DEMISE AREA: **195.5m²**

\# DENOTES NORTHSIDE HOUSE (NSH) LOCATION

Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:

TODD ARCHITECTS
2ND FLOOR TITANIC HOUSE,
6 QUEENS ROAD, BELFAST
BT3 9DT,
T +44 (0) 28 9024 5587,
E INFO@TODDARCH.CO.UK

TODD

Status: INFORMATION	Client: BRISTOL AIRPORT
Date: 30/04/2019	Project Name: **NORTHSIDE HOUSE REFURB**
Dwn by: MM / Ckd by: EH	Drawing Title: SR TECHNICS
Scale: VARIES / Page: A4	Drawing No: **18034 - LE2-01** / Revision: **0**

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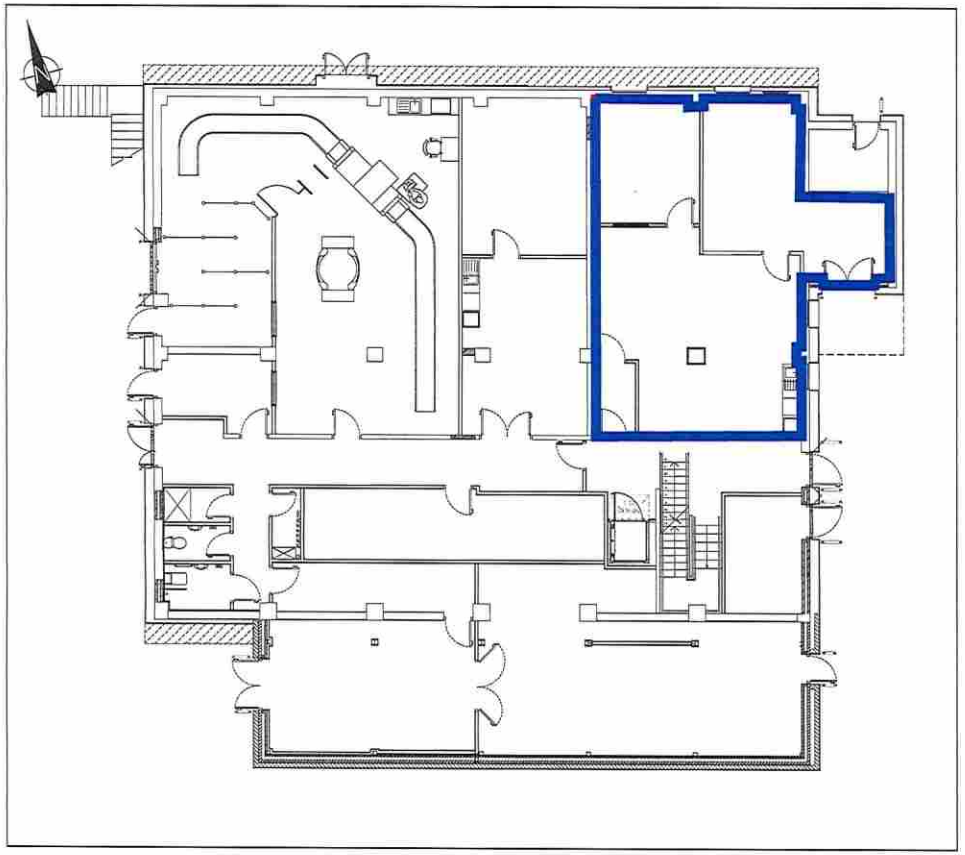
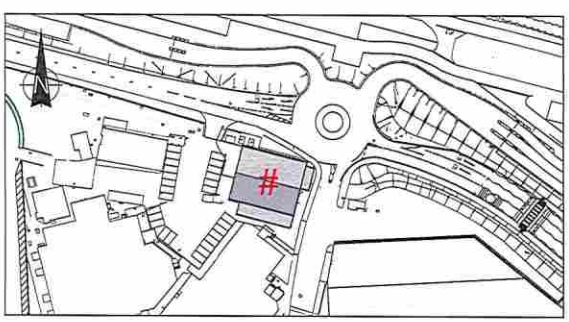
Bristol Airport Northside House - Plan 3F



LEASE PLAN - NSH GROUND FLOOR LEVEL

Scale 1:250



SITE REFERENCE PLAN

Scale 1:2500

KEY

DENOTES LEASE DEMISE

TOTAL DEMISE AREA: **91.7m²**

\# DENOTES NORTHSIDE HOUSE (NSH) LOCATION

Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:

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BT3 9DT,
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TODD

Status: INFORMATION	Client: BRISTOL AIRPORT
Date: 30/04/2019	Project Name: **NORTHSIDE HOUSE REFURB**
Dwn by: MM / Ckd by: EH	Drawing Title: TUI
Scale: VARIES / Page: A4	Drawing No: **18034 - LE2-03** / Revision: **0**

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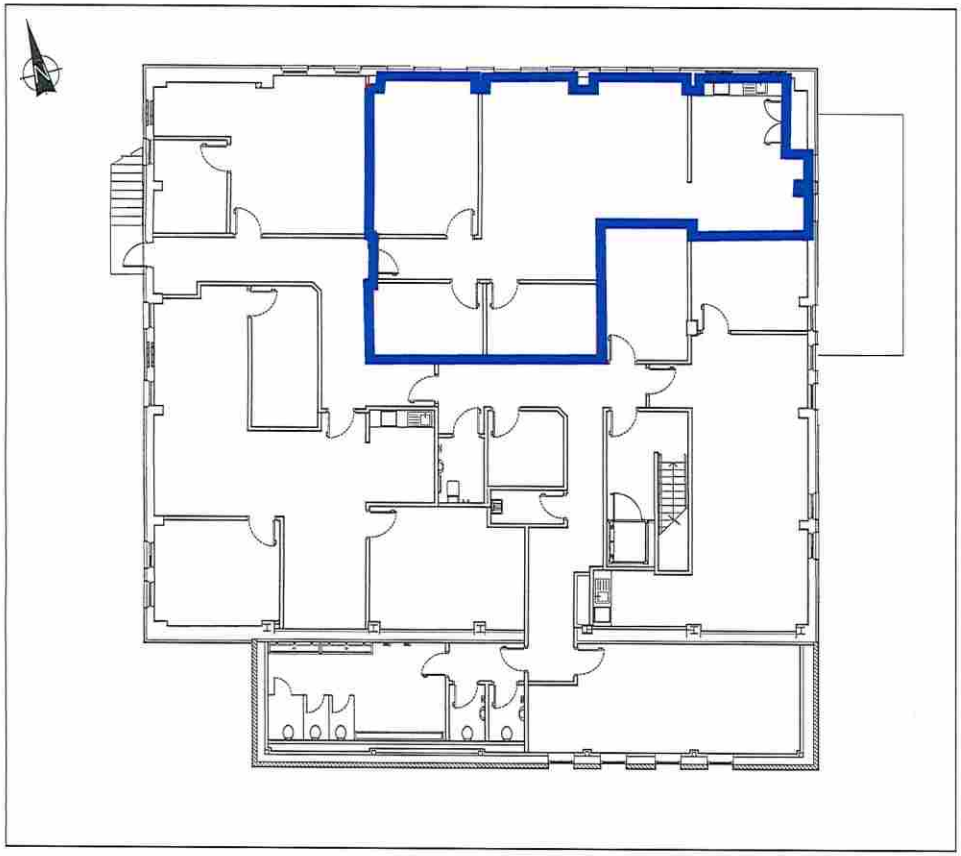
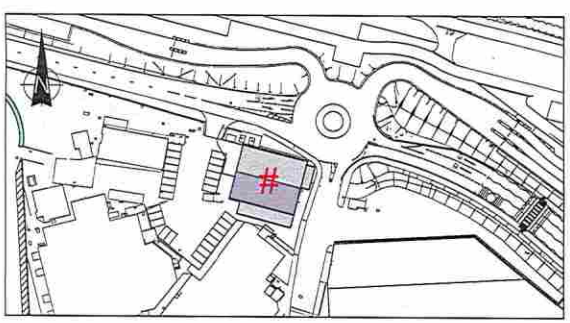
Bristol Airport Northside House - Plan 3**G**



LEASE PLAN - NSH FIRST FLOOR LEVEL

Scale 1:250



SITE REFERENCE PLAN

Scale 1:2500

KEY

DENOTES LEASE DEMISE

TOTAL DEMISE AREA: **112.3m²**

\# DENOTES NORTHSIDE HOUSE (NSH) LOCATION

Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:

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6 QUEENS ROAD, BELFAST
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T +44 (0) 28 9024 5587,
E INFO@TODDARCH.CO.UK

TODD

Status: INFORMATION	Client: BRISTOL AIRPORT
Date: 30/04/2019	Project Name: **NORTHSIDE HOUSE REFURB**
Dwn by: MM / Ckd by: EH	Drawing Title: SWISSPORT
Scale: VARIES / Page: A4	Drawing No: **18034 - LE2-05** / Revision: **0**

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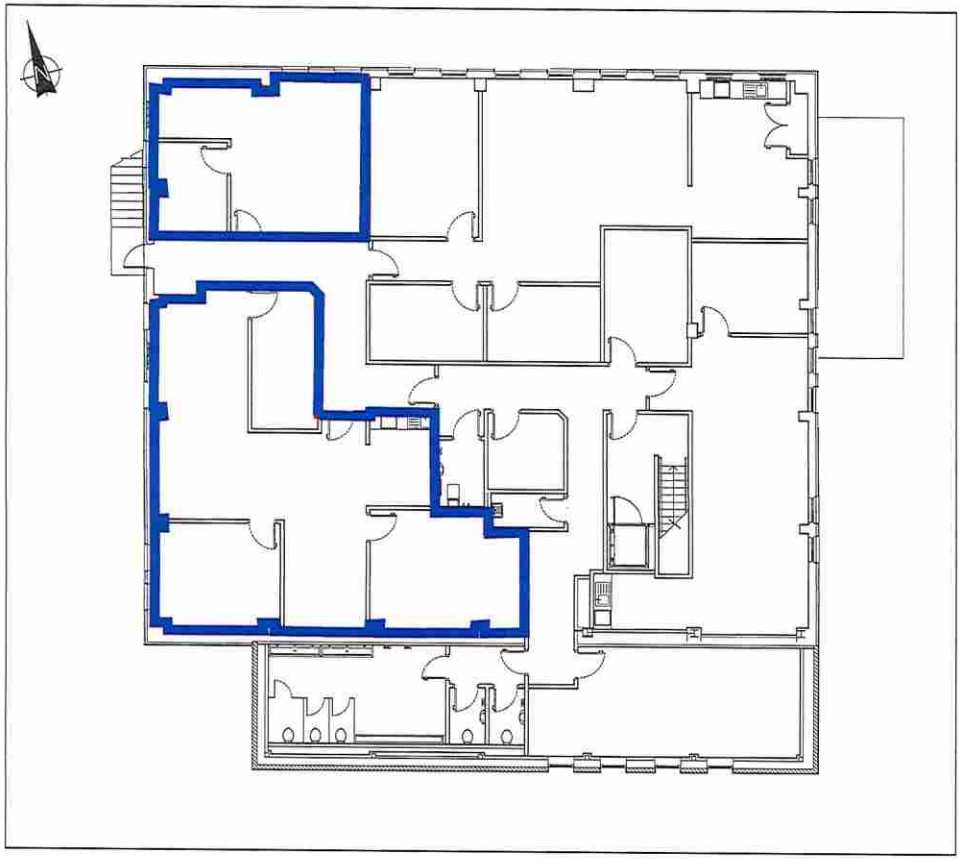
Bristol Airport Northside House - Plan 3**H**



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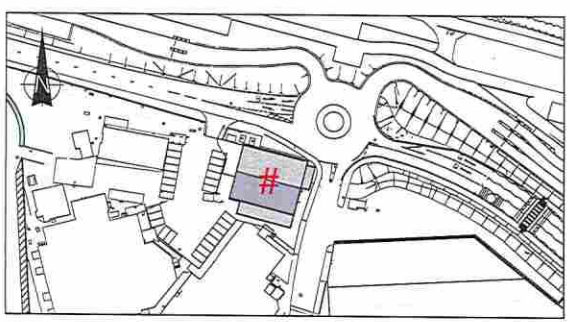
Scale 1:250



SITE REFERENCE PLAN

Scale 1:2500

KEY

DENOTES LEASE DEMISE

TOTAL DEMISE AREA: **147m²**

\# DENOTES NORTHSIDE HOUSE (NSH) LOCATION

Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:

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BT3 9DT,
T +44 (0) 28 9024 5587,
E INFO@TODDARCH.CO.UK

TODD

Status: INFORMATION	Client: BRISTOL AIRPORT
Date: 30/04/2019	Project Name: **NORTHSIDE HOUSE REFURB**
Dwn by: MM / Ckd by: EH	Drawing Title: easyJet (DHL)
Scale: VARIES / Page: A4	Drawing No: **18034 - LE2-04** / Revision: **0**

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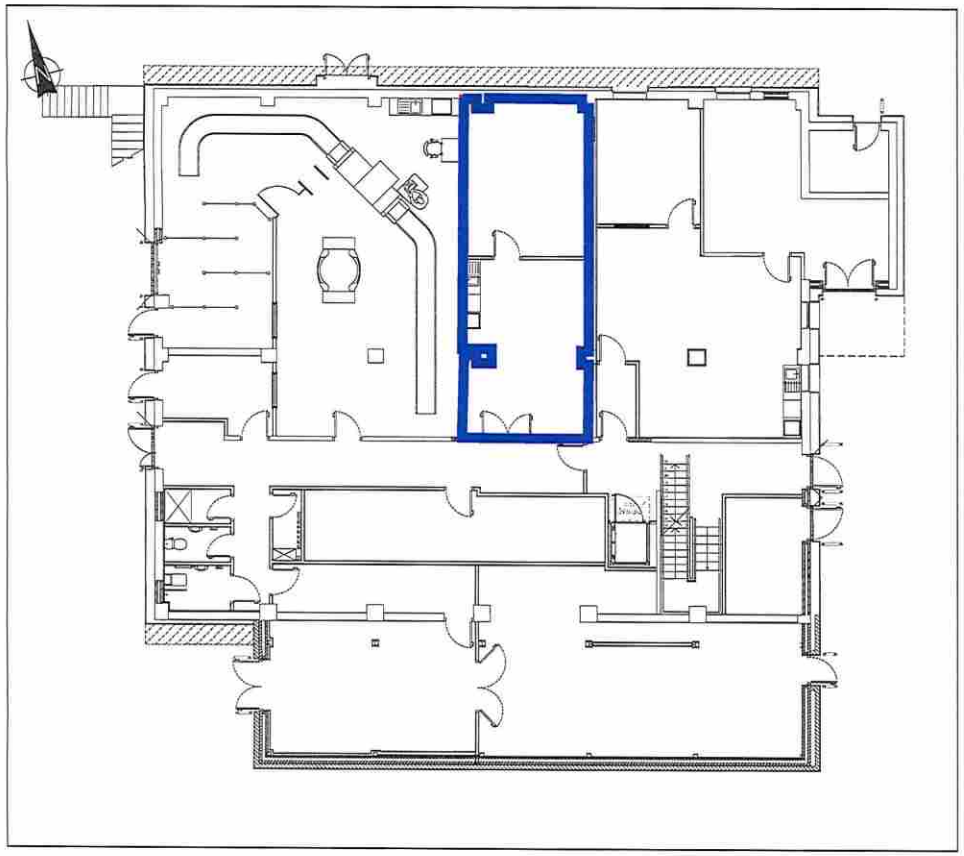
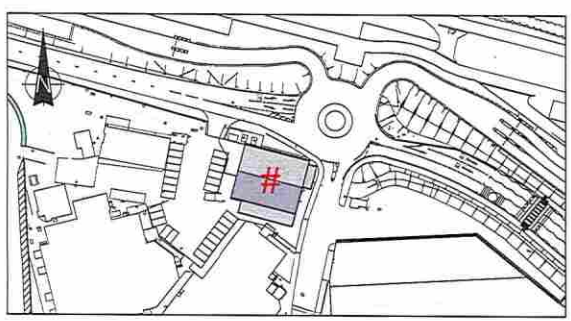
Bristol Airport Northside House - Plan 3I



LEASE PLAN - NSH GROUND FLOOR LEVEL

Scale 1:250



SITE REFERENCE PLAN

Scale 1:2500

KEY

DENOTES LEASE DEMISE

TOTAL DEMISE AREA: **49.7m²**

\# DENOTES NORTHSIDE HOUSE (NSH) LOCATION

Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:

TODD ARCHITECTS
2ND FLOOR TITANIC HOUSE,
6 QUEENS ROAD, BELFAST
BT3 9DT,
T +44 (0) 28 9024 5587,
E INFO@TODDARCH.CO.UK

TODD

Status: INFORMATION	Client: BRISTOL AIRPORT
Date: 30/04/2019	Project Name: **NORTHSIDE HOUSE REFURB**
Dwn by: MM / Ckd by: EH	Drawing Title: MORSON
Scale: VARIES / Page: A4	Drawing No: **18034 - LE2-02** / Revision: **0**

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CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(1) BIRMINGHAM AIRPORT LIMITED
AND FIVE OTHERS

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
06 Aug 2024
KB-2024-002473

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).

BEFORE THE HONOURABLE MR JUSTICE JACOBS

ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

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

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Birmingham Airport, as defined by this Order, should be made by email to protestrequest@birminghamairport.co.uk

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Birmingham Airport**" means the land outlined in red on Plan 1 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Birmingham Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.Birminghamairport.co.uk/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. Affixing a Warning Notice approximately at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.Birminghamairport.co.uk/injunction.

9. The Court will provide sealed copies of this Order to the First Claimant's solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone 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 First Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.

13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FIRST CLAIMANT

16. The First Claimant's solicitors and their contact details are:

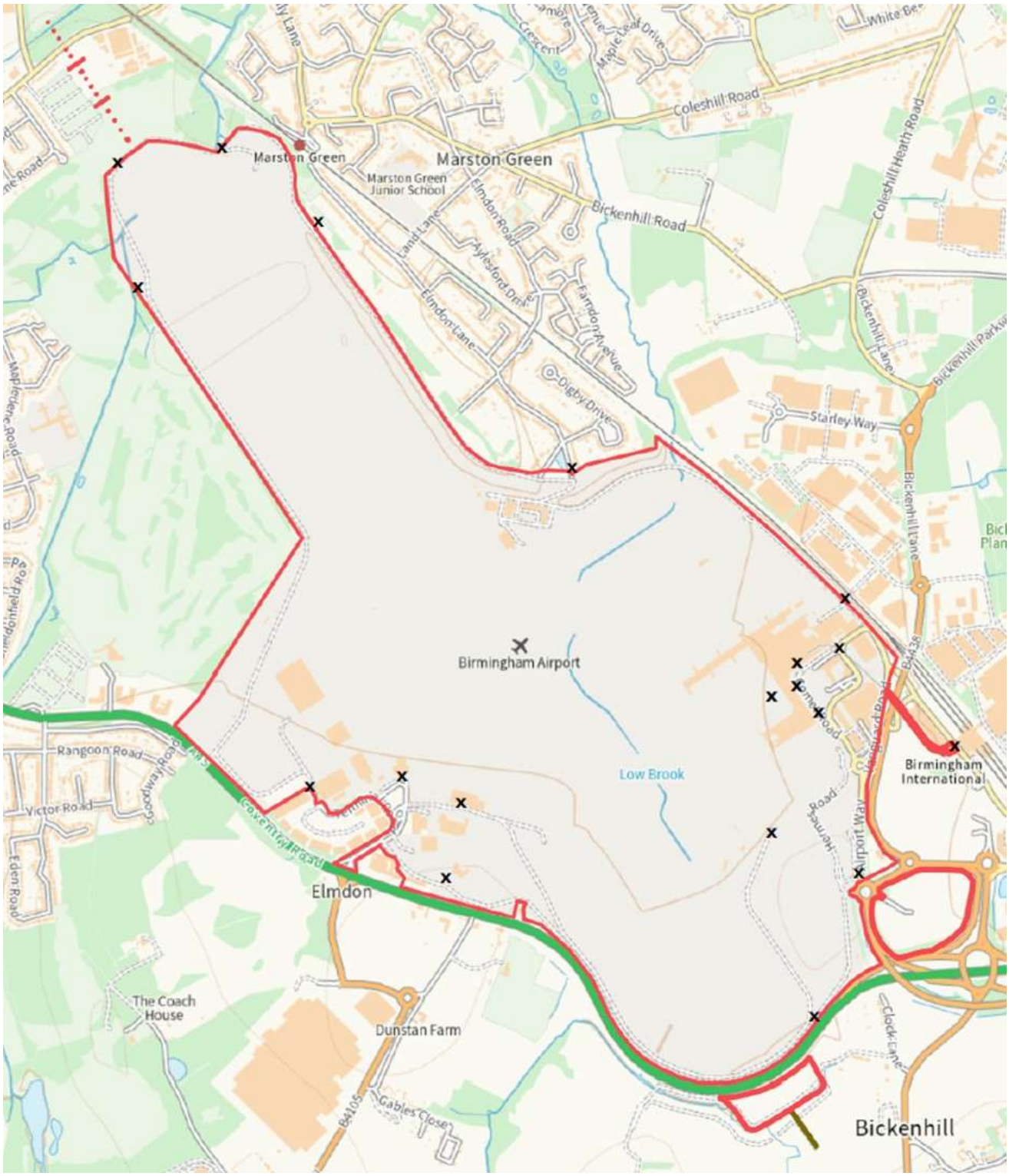
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Marston Green
Marston Green
Marston Green Junior School
Coleshill Road
Bickenhill Road
Elmdon Road
Sand Lane
Aylesford Drive
Elmdon Lane
Farndon Avenue
Digby Drive
Coleshill Heath Road
Bickenhill Lane
Starley Way
Birmingham Airport
Low Brook
Rangoon Road
Victor Road
Goodway Road
Eden Road
Elmdon
The Coach House
Dunstan Farm
Gables Close
B4105
Hermes Road
Birmingham International
Bickenhill

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Birmingham Airport Limited (the "**First Claimant**")

This notice relates to the land known as Birmingham Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

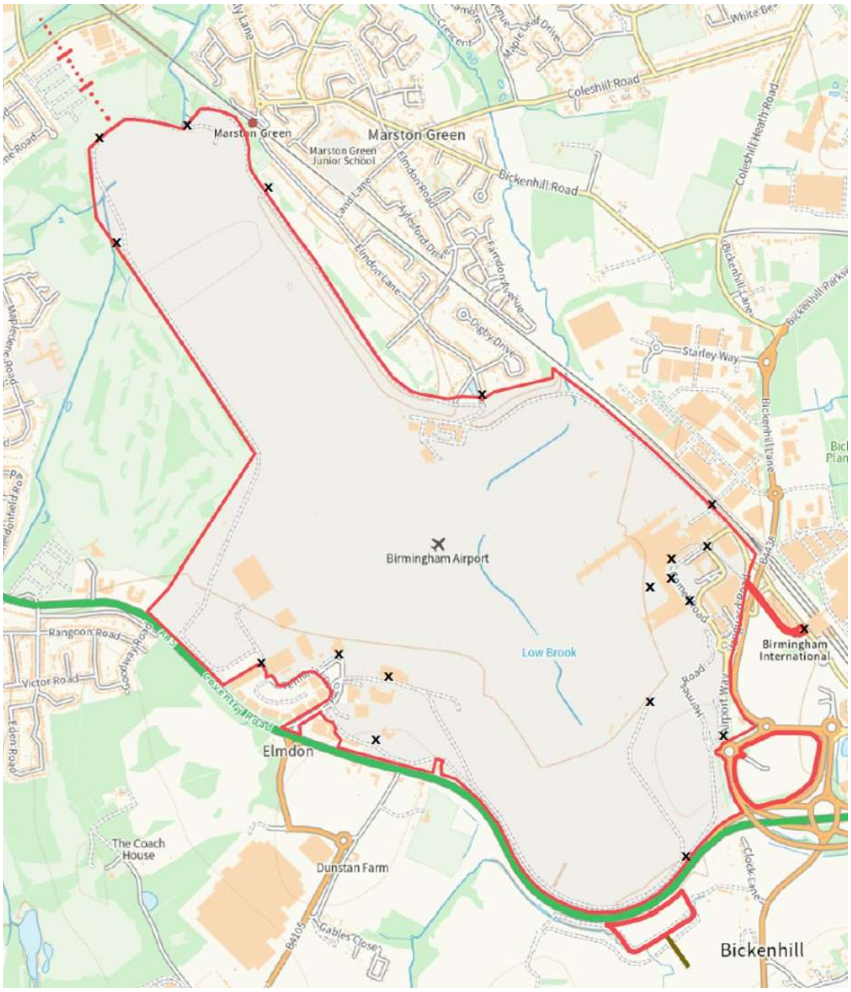
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at: https://www.Birminghamairport.co.uk/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED

AND FOUR OTHERS

Claimants



- v -

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

KB-2024-002473

AND TWO OTHERS

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).

BEFORE THE HONOURABLE MR JUSTICE JACOBS

ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

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

AND UPON the Second and Third Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Liverpool Airport, as defined by this Order, should be made by email to protestrequest@liverpoolairport.com

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Liverpool Airport**" means the land outlined in red on Plan 2 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of Liverpool Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second and Third Claimants.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.liverpoolairport.com/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. Affixing a Warning Notice approximately at those locations marked with an "X" on Plan 2 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.liverpoolairport.com/injunction.

9. The Court will provide sealed copies of this Order to the Second and Third Claimants' solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone 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 Second and Third Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Second and Third Claimants' solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second and Third Claimants' solicitors.

13. The Second and Third Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE SECOND AND THIRD CLAIMANTS

16. The Second and Third 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

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Liverpool Airport - Plan 2
N
Map scale 1:11,000
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

1671

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND AND THIRD CLAIMANTS

(1) The Second and Third 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

KB-2024-002473 High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Liverpool Airport Limited and Peel L&P Investments (North) Limited (the "**Second and Third Claimants**")

This notice relates to the land known as Liverpool Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second and Third Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Second and Third Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at: https://www.liverpoolairport.com/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

AND THREE OTHERS

Claimants

- v -

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

HIGH COURT OF JUSTICE
06 Aug 2024
QUEEN'S BENCH DIVISION

KB-2024-002473

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).

BEFORE THE HONOURABLE MR JUSTICE JACOBS

ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

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

AND UPON the Fourth, Fifth and Sixth Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Bristol Airport, as defined by this Order, should be made by email to protestrequest@Bristolairport.com

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Bristol Airport**" means the land shown outlined in red on Plan 3 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Bristol Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Fourth, Fifth and Sixth Claimants.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.Bristolairport.com/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. Affixing a Warning Notice approximately at those locations marked with an "X" on Plan 3 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.Bristolairport.com/injunction.

9. The Court will provide sealed copies of this Order to the Fourth, Fifth and Sixth Claimants' solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone 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 Fourth, Fifth and Sixth Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Fourth, Fifth and Sixth Claimants' solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Fourth, Fifth and Sixth Claimants' solicitors.

13. The Fourth, Fifth and Sixth Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FOURTH, FIFTH AND SIXTH CLAIMANTS

16. The Fourth, Fifth and Sixth 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

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Bristol Airport - Plan 3
N
Downside
Lulsgate Bottom
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

SCHEDULE 2 – UNDERTAKINGS GIVEN BY THE FOURTH, FIFTH AND SIXTH CLAIMANTS

(1) The Fourth, Fifth and Sixth 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Bristol Airport Limited, South West Airports Limited and Bristol Developments Limited (the "**Fourth, Fifth and Sixth Claimants**")

This notice relates to the land known as Bristol Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Fourth, Fifth and Sixth Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fourth, Fifth and Sixth Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at: https://www.Bristolairport.com/injunction.

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BEFORE MR JUSTICE JACOBS

DATED 6TH AUGUST 2024

BETWEEN:



(1) BIRMINGHAM AIRPORT LIMITED

(2) LIVERPOOL AIRPORT LIMITED

(3) PEEL L&P INVESTMENTS (NORTH) LIMITED

(4) BRISTOL AIRPORT LIMITED

(5) SOUTH WEST AIRPORTS LIMITED

(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

-and-

PERSONS UNKNOWN

As more particularly described in the Amended Claim Form

Defendant

ORDER

Before The Honourable Mr Justice Jacobs sitting at the Royal Courts of Justice, the Strand, London on 6 August 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for injunctions dated 31 July 2024 ("**the Application**")

AND UPON READING the Application, the first witness statement of Nick Barton dated 31 July 2024, the first witness statement of John Irving dated 31 July 2024, the first witness statement of Graeme Gamble dated 31 July 2024, and the first witness statement of Stuart Wortley dated 1 August 2024 and the witness statement dated 6 August 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley for the Claimants and no one attending for the Defendants

AND UPON the Court granting the Claimants injunctions on 6 August 2024 in respect of the land shown outlined in red on Plans 1, 2 and 3 to the Amended Claim Form (the "**Orders**")

IT IS ORDERED THAT:

PERMISSION TO AMEND

1. To the extent required, the Claimants have permission to amend the Claim Form and Particulars of Claim as:

    a. To the description of the Defendants.

    b. To substitute a new plan 1 for Birmingham Airport.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2024-002473

BETWEEN

(1) BIRMINGHAM AIPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

And

PERSONS UNKNOWN
as more particularly described in the Amended Claim Form

Defendants

NOTE OF "WITHOUT NOTICE" HEARING BEFORE MR JUSTICE JACOBS LISTED FOR 6 AUGUST 2024 AT 10:30

The hearing commenced at 10:30 on 6 August 2024. Appearing for the Claimant, Tim Morshead KC ("TM") and Peter Sibley ("PS") before Mr Justice Jacobs ("J").

1. TM thanked J for taking the matter in the vacation, and referred to how Cs were among the last airports not to be protected by an injunction. He commented that the injunctions still seem to be effective, and confirmed that this was the reason these proceedings were suitable vacation business.

2. TM outlined his proposed course, namely addressing preliminary matters, outlining the relevant facts and matters concerning the airports and the title position, highlighting the evidence of the threat including sweeping up alternative remedies, then addressing the legal framework and finally by making submissions. Finally, TM proposed to take J through the draft orders.

3. J indicated that he had read the witness evidence, the skeleton, some plans, the Valero decision, the Wolverhampton decision (although some time ago), the Gatwick decision and various airport injunction cases on Westlaw.

4. J noted that the case was listed, and that there had therefore been some notice to some extent.

5. TM confirmed this but referred to the need to keep notice of the hearing to a minimum.

Preliminary matters

6. TM handed up the Heathrow airport order and hearing note, along with a short supplementary witness statement from Stuart Wortley dated 6 August 2024.

7. J took time to read the statement.

8. TM explained the 6 August 2024 Stuart Wortley statement concerned the 2012 Bristol Byelaws.

9. J confirmed that this was not central to the case, the point being that the fact that there are byelaws does not prevent an injunction from being ordered.

10. TM further explained that the 2012 byelaws leave open as a question of fact what constitutes the airport. Mr Gamble in his witness statement simply attaches a plan without expressing a view or making this clear.

11. TM also drew J's attention to Mr Wortley's first witness statement ("Wortley 1") at pg 215, where there are three mistaken names in paragraph 99.

12. TM then referred to paragraph 20 of the skeleton, and the fact that relief is sought without distinguishing between the areas Cs can directly claim trespass in relation to, and those let out or occupied by 3rd parties. TM referred to how in fact, in the City Airport injunction proceedings, this approach was not adopted and the third party areas were carved out. However, the City Airport approach has not been followed in other similar airport cases since.

13. J asked if the issue of third party areas arises in respect of all of the other injunctions.

14. TM confirmed that it did. He explained that an airport has a general power and responsibilities for the airport as a whole, but as a matter of commerciality it lets out large areas, where private organisations conduct their operations. There are lots of arrangements the details of which it is inappropriate to get involved with. The activity Cs are seeking to stop is of a character that if allowed to take place fluidly on third party areas it would undermine substantially the effectiveness of the relief in relation to the generality of the areas. Also, there is the threat of nuisance arising from protest on third party areas. There are accordingly, two proper jurisprudential bases to restrain protest on the third party areas.

Factual position and title

15. TM then made submissions on the airports and the factual position on the ground. He referred to Wortley 1 which describes the title position in detail at paragraphs 10 to 22, and appends the title documents at pages 219 to 528 of the hearing bundle. TM said it was appropriate to trust

the exercise done by the solicitors. He noted that the product for each airport is the "A" series of plans for each airport.

16. J asked if the plans were annexed to the Particulars of Claim.

17. TM confirmed this.

18. TM explained that the title number on the legend on the left hand side of the A series of plans corresponds to the areas indicated on the plan itself. The upshot is to show that C1, with reference to the plan on pg 61, is the owner and prima facie entitled to maintain an action in trespass in relation to the red line area, on plan 1, most conveniently found on the draft order at page 9 of the bundle. TM explained that one of the odd features is that none of the airports have simple arrangements for landing lights. It is a mixture of outright ownership, long occupation and sometimes on unregistered land. Even assuming no paper title in relation to this, nevertheless the areas are occupied by the equipment. Relief is needed for effective protection, and or to prevent nuisance.

19. TM referred to plan 2A on page 63 of the bundle for the position in relation to Liverpool, and to plan 3A at page 65 of the bundle for the position for Bristol.

20. TM then referred to the next stage of the exercise carried out with reference to the "B" series of plans. Wortley 1 at paragraphs 25 - 31 deals with this, and pg 62 of the bundle shows the plan for Birmingham. This plan shows the areas in some sense carved out as third party rights. The blue areas on the plan are where everything is let out to a third party. The green areas of the plan indicate areas, typically terminals, where things are more complicated; some of that area is still retained by Cs, other parts are let out.

21. TM referred to the Birmingham Air Rail link and platform and the fact that C1 has an agreement for lease in respect of this and C1 is in fact the occupier.

22. J commented that he could not see the landing lights on plan 1B.

23. TM responded that the northern lights are shown, and the southern lights are in the area shaded in brown. The Liverpool plan at pg 64 of the bundle adopted the same convention concerning blue and green land. Liverpool airport, unlike the other two, has within it public highways. Prima facie, the public has a right of protest on this. In respect of Bristol airport, the equivalent plan is on pg 66, where the same colouring convention is used.

24. TM noted that it has been possible for Bristol airport to drill down and provide more minute detail as to what is found at the green areas, at pages 67, 68, 69 of the hearing bunlde. The parts outlined in blue are those bits within the green zones let out or licenced to third parties.

25. TM then addressed notification of intention to seek relief – he referred to Wortley 1 at paragraphs 32 to 37 – the major tenants were given notice. It is improbable that relief if granted would cause harm to anyone not notified but the liberty to apply provision can be relied on.

Airports

26. TM then referred to the sensitive features of airports – with reference to the witness statement of Mr Barton, at paragraphs 31 - 48, the witness statement of Mr Irving, at paragraphs 35 - 37, and the witness statement of Mr Gamble at paragraphs 36 - 38. The witnesses for Liverpool and Bristol, Gamble and Irving, follow the lead of the Birmingham witness, Barton.

27. TM summarised the evidence. He noted that it is clear from the evidence, that airports have a special sensitivity and vulnerability owing to the sheer volume of human and other traffic participating in airport activities. There is the movement of vast, delicate and dangerous machines, proximity to toxic and dangerous materials, and zones of interest for counter terrorism. It is a high stress high activity environment where there is a premium on normal behaviour and a strong interest in keeping unexpected behaviour to a minimum. There is a heightened risk as protest may be used as a mask for terrorism, with reference to pg 91 of the hearing bundle.

28. TM also noted another feature of airports, which has required other orders in airport injunction cases to have included reference to what amounts to intention or purpose in the definition of the defendants. A particular feature of airports makes this unavoidable, as one is not dealing with sealed sites, e.g. oil terminals, but sites where the public are allowed (some) access. There is no other practical way of dealing with this than by referring in some way to intention or purpose.

29. J asked what was done in previous cases in relation to the purpose point.

30. TM referred to how a distinctive feature of the draft orders in this case is that they follow the orders of Ritchie J, where he used the word purpose. The draft orders in this case respect this direction of travel from the judiciary but the wording in the Claim Form does not reflect this. The Claim Form is to be amended to ensure alignment between the descriptions in the orders and the pleadings.

31. TM also referred to another area of interest about airports, namely the economic and potential chaos factor and cascade impact of disruption and delays. Economic impacts are significant as the daily turnover is around £750,000. Airports are an integral part of life and when the wheels come off, the consequences are felt widely, as is well known.

Threat and compelling need

32. TM then turned to the next section of his submissions, namely the threat posed and the compelling need for the injunction – addressed at paragraphs 38 – 85 of Wortley 1. This sets out the history of JSO and provides a summary from 2022 onwards. The focus was on oil terminals, noting a shift in emphasis towards airports. TM quoted from an extract starting at pg 580 of the hearing bundle; a JSO post from 13 September 2023. TM noted that this was the start of a shift away from a focus on the oil industry and an admission that an injunction is an effective instrument. TM then referred to an article on pg 590 and 591 of the bundle being an article from the Mail Online relating to an undercover journalist from the Mail Online discovering JSO's airport plans. TM then referred to JSO coming clean about their airport plans following the Mail Online article at pg 604 of the bundle.

33. J commented that this was really as a result of the Mail Online exposure of their plans.

34. TM then referred to paragraphs 71 – 80 of Wortley 1 which describes, to the extent to which he is aware, that JSO's plan has materialised. TM referred to incidents on 2 June at Farnborough, 20 June at Stansted, 25 June at Gatwick, 27 June, 24 July at Heathrow, 29 July at Gatwick, and 30 July at Heathrow. This shows the threat specifically and on a sustained basis by campaigners. Wortley 1 describes other injunctions obtained by airports at paragraph 89.

35. J asked how similar the draft orders in this case were to the injunction order in Gatwick.

36. TM responded that Cs have laboured to align the relief sought in this case with what was granted by Ritchie J in Gatwick, which is the most refined order made in relation to airport protest injunctions.

37. One nuance noted by Ritchie J was in respect of the Gatwick railway station. Ritchie J was alive to people arriving at the rail station and not realising they were affected by the injunction, and so carved out the railway station. This had not been done here as C1 is in occupation of the whole of the railway station. TM noted that J might decide in this case that he should apply the injunction only outside of the precincts of the railway.

38. J asked why. He asked if this would be because would be protestors might not know of the injunction when stepping off a train.

39. TM responded that Ritchie J's nervousness was as a result of people getting off the train who might not have seen the notice. Ritchie J wanted to be clear of the moment beyond which someone cannot plausibly say they did not understand what they were told not to do.

40. TM commented that Wortley 1 explains injunctions granted previously appear to have been effective. This was evidenced by the September 23 admission by JSO and, as noted in Wortley

1, a protest scheduled for City airport on 27 July shifted to central London following the obtaining of an injunction.

Effectiveness of injunctions

41. J asked why injunctions are more effective than the general law.

42. TM ventured a guess, that some are willing to take their chances in front of a magistrate or jury, but are not willing to take their changes in front of a judge.

43. TM referred to the photo evidence at page 650 of the hearing bundle. He explained that this was the law working as it should. The general law may in these cases be treated without respect by the protestors that one would wish for. But at the moment, the principle that the courts are authoritative is as it should be, and is recognised as a sign that the activity which is enjoined must not happen. There cannot be a guarantee that there will be no breaches, but perfection must not be the enemy of the good.

Alternative remedies

44. TM noted that Cs are required by the Supreme Court in the Wolverhampton decision to have regard to alternative remedies, including Byelaws and the general law. The story is that the general law is not enough. It is part of the program of the protestors to risk arrest. Cs armed with an injunction have more control over the process than when enforcement is left to public authorities. The potential for delay is reduced with breach of injunctions. With Byelaws, the available sentences are generally modest with a maximum fine of £2500.

45. New offences are now on the statute book. Mr Hallam has now been sentenced to 5 years in prison. Once that sinks in the general law may have a greater deterrent effect.

46. J asked what Mr Hallam had been sentenced for, i.e. under what statute.

47. TM replied that it was a public order offence.

48. TM further commented that 5 years is a very long sentence, and it is possible that it will have a deterrent effect in the future, but that is not felt yet. Ritchie J in the Gatwick case noted that this was something to be assessed when the injunction is on for review. At the moment, there is no evidence that the general law is causing protests to abate. The answer to the requirement to consider alternative remedies, is that as matters stand, the evidence suggests that injunctions are doing what the general law cannot do. It is hoped that it will change but at the moment that is the position.

Legal Framework

49. TM then addressed the legal framework. As indicated in the Valero decision, Ritchie J's judgment is written on the basis that this is an emerging jurisdiction. No decision has a concrete description or prescribed set of questions. The court still has a part to play in working out the right response.

50. TM referred to the Wolverhampton decision at paragraph 167 where the court sets out the conclusions at that stage about the nature of the jurisdiction. TM submitted that the key controlling characteristic is compelling need. This is the key thing that attracts the eye of equity.

51. TM noted that the Supreme Court emphasised that this jurisdiction is at an early stage at para 185. He referred to paragraphs 222 and 224 of Wolverhampton where the Supreme Court dealt with the principle of the court enjoining lawful activity.

52. Then TM referred to paragraphs 225 - 226 where the Supreme Court dealt with the fact that the Supreme Court was dealing with traveller rather than protest cases.

53. TM then referred to the decision in Cuadrilla at paragraph 50.

54. TM then referred to the synthesis of the principles in Valero at paragraphs 57 to 58, a synthesis between the principles in Wolverhampton and established practice. He referred to the checklist but confirming that this is not the be all and end all.

55. TM also referred to paragraph 66 of Valero in relation to Articles 10 and 11. He submitted that Cs say the balancing exercise does not really fall to be applied in respect of the public highways in Liverpool, the only airport with public highway. TM invited the judge, if inclined to conduct the balancing exercise, to adopt Ritchie J's approach at paragraph 66 of Valero.

56. J asked if the highway point had arisen in other Airport cases.

57. TM responded that Leeds airport was an example.

Submissions

58. TM submitted that the court has the material before it from which to make an order.

59. TM referred to how if the protestors were present, they would likely invoke their strongly held beliefs, and an argument based on the convention.

60. TM referred in this regard to Ritchie J in Valero at para 66. Furthermore, he referred to the principle that the public has no right to be on private land except for purpose of the land owner's consent.

Note of judgment

61. J held that he was prepared to grant an injunction. This case is materially the same as other airport injunction cases and even if he is not strictly bound by those other cases, he ought to afford respect to those other cases and other decisions as a matter of precedent, unless there is some material point of distinction. J was of the view that the reasoning of Ritchie J is sufficient to persuade him to grant an injunction. J held that he did not need to find anything more. He noted that he has been taken through the law and tests and is satisfied on the main points of ownership, features of airports, the compelling need and that there is no substantial defence to be advanced. Ultimately following what has been said by Ritchie J, after giving careful consideration J considered it appropriate to grant an injunction.

62. TM commended this approach, and noted the danger of reinventing the wheel.

Order

63. J reviewed the draft orders against the order from the Gatwick decision at pg 728 of the hearing bundle.

64. TM commented that the descriptions of the defendants should be the same as in Gatwick with suitable amendments.

65. J considered that the shorter definition of "Warning Notice" in the Gatwick order should be used.

66. J queried whether there needed to be any carve out for the train station at Birmingham airport.

67. TM proposed inserting a new plan to the Birmingham airport order to address this point.

68. TM noted that paragraph 2 of the draft order should be amended in line with the Drax injunction order to include procedural machinery for the review hearing.

69. J noted that the draft order by paragraph 3 dispensed with service but referred to service in subsequent paragraphs.

70. TM referred to the nuance following Wolverhampton about how in these sui generis types of injunction cases, there is "notification" rather than service.

71. J proposed changing the "service and notification" wording in the draft order to "service or notification" to deal with this issue.

72. J proposed in respect of paragraph 11 of the draft order that reference to email service on Mr Hallam should be removed as he has been sentenced to 5 years in prison.

73. TM noted that although the points discussed were discussed in respect of Birmingham airport, save for the rail way station point, the same issues would apply to the other draft orders.

74. TM noted an issue common to all, namely that undertaking 1 in schedule 2 was duplicated in the body of the order and should be removed.

There was then a 15 minute adjournment between 12:15 and 12:30.

75. TM showed the judge an amended plan for Birmingham airport adjusting the red line boundary of the injunction around the railway station.

76. J approved this.

77. J asked for draft orders to be emailed to his clerk in red line and in final “clean” form.

The hearing concluded at 12:40.

Claim no: KB-2024-002473

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) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORT LIMITED
(6) BRISTOL AIRPORT DEVELOPMENT LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

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 6 August 2024 by Jacobs J ("**the Jacobs J Order**")

AND UPON the Claimants' application dated 2 June 2025

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 Jacobs J Order

IT IS ORDERED that:

1. The Jacobs J Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 2 of the Jacobs Order).

2. Paragraph 2 of the Jacobs J Order is amended so as to read:

"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 the Claims, 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. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

KB-2024-001765 / KB-2024-002132 / KB-2024-002317 / KB-2024-002473

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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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 Dienne 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

N244

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-2024-002473**
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
	H W F - - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Birmingham Airport Limited and others	
Defendant's name (including ref.) Persons unknown (as more particularly described in the Claim Form)	
Date	2 June 2026

HIGH COURT OF JUSTICE
02 Jun 2026
QUEEN'S BENCH DIVISION

KB-2024-002473
Sub Event ID: 28

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

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 Jacobs J dated 6 August 2024 ("**the Jacobs 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-2024-002473.

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.

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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 Jacobs J Orders are attached, together with the Bourne J Orders.

2. The Bourne J Orders and the Jacobs J Orders together provide that:

   a) the injunctions granted pursuant to the Jacobs 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 the Claims, 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	Month	Year
2	June	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

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BEFORE: MRS JUSTICE STACEY DBE

DATED: 16 JUNE 2026

BETWEEN:-

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENT LIMITED

Claimants

HIGH COURT OF JUSTICE
16 Jun 2026
QUEEN'S BENCH DIVISION
KB-2024-002473

- v -

PERSONS UNKNOWN AS DESCRIBED IN THE CLAIM FORM

Defendants

ORDER

UPON the Claimants' claim by the Claim Form dated 31 July 2024 (as amended)

AND UPON the Claimants' application for an injunction dated 31 July 2024

AND UPON the making of an injunction by order dated 6 August 2024 by Mr Justice Jacobs ("**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 on 24 June 2026 or a date thereafter as soon as is convenient for the Court, together with the review hearing in claims KB-2024-002132 and KB-2024-002317 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 5 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.

Wright, Alexander

From: KB Judges Listing Office <KBJudgesListingOffice@Justice.gov.uk>
Sent: 19 June 2026 15:45
To: Wright, Alexander; Owen, Elin; EvershedsCourtClerk; Stuart Wortley - New Mailbox (2026); 'NawaazAllybokus@eversheds-sutherland.com'; a@eversheds.com; Martin, Steve
Subject: KB-2024-002473 Birmingham Airport Limited and others -v- Unknown and others

Dear all,

In accordance with the Order of Mrs Justice Stracey dated 16th 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

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Party: Claimants
Name: A Wright
Number: First
Date: 11.06.26
Exhibits:
"AJW1 – AJW23"

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS 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 – AJW23**".

1.4 On 6 August 2024, Jacobs J granted injunctions to restrain the Defendants from entering, occupying or remaining on Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport until varied, discharged or extended by further order ("**the 2024 Orders**") – copies of which are exhibited at **Exhibit AJW1**.

1.5 Paragraph 4 of the 2024 Orders provided for each of those injunctions 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 injunctions granted pursuant to the 2024 Orders were 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 Nick Barton dated 31 July 2024 made on behalf of the First Claimant ("**the N Barton Statement**");

1.8.2 the witness statement of John Irving dated 31 July 2024 made on behalf of the Second and Third Claimants ("**the J Irving Statement**");

1.8.3 the witness statement of Graeme Gamble dated 31 July 2024 made on behalf of the Fourth, Fifth and Sixth Claimants ("**the G Gamble Statement**");

1.8.4 the witness statement of Stuart Wortley dated 1 August 2024 ("**the First S Wortley Statement**"); and

1.8.5 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 N Barton Statement, the J Irving Statement, the G Gamble Statement and the S Wortley Statements.

2.2 For present purposes it is sufficient to note that the injunctions were sought and obtained:

2.2.1 to protect Birmingham Airport, Liverpool John Lennon Airport and Bristol 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 Orders in respect of Birmingham Airport, Liverpool John Lennon Airport and Bristol 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 ORDERS AND THE 2025 ORDERS

3.1 The 2025 Orders are substantively on the same terms and provide:

3.1.1 at paragraph 1, that the 2024 Orders "*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 2 of the Jacobs Order)*"; and

3.1.2 at paragraph 2 for a variation to paragraph 2 of the 2024 Orders.

3.2 The 2024 Orders, as varied by the 2025 Orders, are substantively on the same terms and provide:

3.2.1 for the injunction to take "*immediate effect*" and until "*unless varied, discharged or extended by further order…*"; and

3.2.2 at paragraph 4:

"*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 the Claims, 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 Orders and the 2024 Orders (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 Orders, in so far as they relate to Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport, were served in accordance with paragraph 5 of the 2024 Orders by:

4.1.1 a copy of the 2025 Order being uploaded to each of the individual airports' injunction websites. I have been informed by:

4.1.1.1 Kristin Garrett, General Counsel for Birmingham Airport, that a copy of the relevant 2025 Order was uploaded by a relevant member of staff to the Birmingham Airport injunction website on 27 June 2025;

4.1.1.2 John Irving that a copy of the relevant 2025 Order was uploaded by a relevant member of staff to the Liverpool John Lennon Airport injunction website on 30 June 2025; and

4.1.1.3 Graeme Gamble that a copy of the relevant 2025 Order was uploaded by a relevant member of staff to the Bristol Airport injunction website on 1 July 2025.

Printouts from each of the individual airports' injunction websites are exhibited at **Exhibit AJW4**, confirming that a copy of the relevant 2025 Order was uploaded and continues to be available on those websites.

4.1.2 the continuing presence of warning notices at the locations marked with an "X" on the plans to the 2024 Orders (being the plans at **Exhibit AJW5**), which I cover further below at paragraph 4.4; and

4.1.3 whilst not strictly required under the terms of the 2024 Orders, a copy of the 2025 Order was affixed at the locations marked with an "X" on the plans to the 2024 Orders (being the plans at **Exhibit AJW5**) at Liverpool John Lennon Airport. I have been informed by:

4.1.3.1 John Irving that a copy of the 2025 Order was so affixed at the relevant locations at Liverpool John Lennon Airport on 30 June 2025; and

4.1.3.2 Kristin Garrett, General Counsel for Birmingham Airport, and Graeme Gamble, Chief Operating Officer for Bristol Airport that a copy of the 2025 Order was not so affixed at Birmingham Airport and Bristol Airport respectively.

4.2 In addition to the above steps, paragraph 5 of the 2024 Orders required a copy of the 2025 Orders to be served by an email sent to each of the email addresses listed in Schedule 3 to the 2024 Orders. 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 Orders by email on 9 June 2026, a copy of which is exhibited at **Exhibit AJW6**.

4.4 I am told by Kristin Garrett, General Counsel for Birmingham Airport, John Irving, Chief Executive Officer of Liverpool John Lennon Airport, and Graeme Gamble, Chief Operating Officer of Bristol Airport that a regime is in place at each of their respective airports 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 Orders.

5. THE AIRPORT BYELAWS AND PLANS

5.1 The injunctions granted in this action and in actions 2 and 4 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) would not be entitled to legal possession – including for example highways land and areas which are demised to third parties).

5.2 The injunctions in this case currently extend to the land edged red on Plan 1 (Birmingham Airport), Plan 2 (Liverpool John Lennon Airport) and Plan 3 (Bristol Airport) to the 2024 Orders – a copy of the relevant plans are exhibited at **Exhibit AJW7**.

5.3 I am informed by Kristin Garrett (General Counsel for Birmingham Airport) and other members of her in-house legal team that:

5.3.1 there have been no changes to the Birmingham Airport Byelaws 2021 and that the Plan attached to the Birmingham Airport Order dated 6 August 2024 remains 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 Birmingham Airport for a further 12 months; and

5.3.3 it is now the case that:

5.3.3.1 around 13.6 million passengers travelled through the airport in 2025;

5.3.3.2 c.1,000 members of staff are now employed directly by the First Claimant (up from c.900) and that c.9,300 are employed across Birmingham Airport more widely; and

5.3.3.3 31 commercial airlines operate from Birmingham Airport rather than 30.

5.4 I am informed by John Irving, Chief Executive Officer of Liverpool John Lennon Airport that:

5.4.1 there have been no changes to the Liverpool John Lennon Airport Byelaws 2022 and that the Plan attached to the Liverpool John Lennon Airport Order dated 6 August 2024 remains accurate; and

5.4.2 third party occupiers within the 'red line' of the injunction order boundary have been informed that an application has been made to continue the injunction in respect of Liverpool John Lennon Airport for a further 12 months – Mr Irving has informed me that no responses have been received following that notification.

5.5 I am informed by Graeme Gamble, Chief Operating Officer of Bristol Airport that:

5.5.1 there have been no changes to the Bristol Airport Byelaws 2012 and that the Plan attached to the Bristol Airport Order dated 6 August 2024 remains accurate; and

5.5.2 third party occupiers within the 'red line' of the injunction order boundary have been informed that an application has been made to continue the injunction in respect of Bristol Airport for a further 12 months – Mr Gamble has informed me that no responses have been received following that notification.

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 the airports in question are detailed in the N Barton Statement, the J Irving Statement and the G Gamble Statement. By way of summary, however, these include but are not limited to:

6.1.1 the Claimants' ability, at their respective airports, 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 the respective airports.

6.2 I understand from Kristin Garrett, General Counsel for Birmingham Airport, John Irving, Chief Executive Officer of Liverpool John Lennon Airport, and Graeme Gamble, Chief Operating Officer of Bristol Airport, that the potential implications for counter-terrorism operations at their respective airports 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 AJW8**.

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

6.3.1 the previous evidence of Nicholas Barton, Chief Executive Officer of Birmingham Airport, in these proceedings as set out at paragraph 37 in the N Barton Statement:

"*37. All airports are a potential target for terrorist activity (which explains why they are routinely patrolled by police carrying firearms) meaning:-*

37.1. there is heightened security and any activity which is out of the normal is particularly dangerous. Any protest activity could be interpreted (whether correctly or not) by the security services at airports as a potential threat, meaning that the police or security services may intervene with significant knock-on effects. If the protestors pose no security or counter-terrorism threat, that would be a distraction for the police and our security team and a diversion of resources which are necessary for the counter-terrorism work they carry out to keep members of the public safe; and

37.2 there is also always the potential that the protests are, or turn, violent or are, in fact, used as cover for actual terrorist attacks".

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 Kristin Garrett (General Counsel for Birmingham Airport), John Irving (Chief Executive Officer of Liverpool John Lennon Airport) and Graeme Gamble (Chief Operating Officer of Bristol Airport) respectively that there have been no incidents of protests (lawful or otherwise) at Birmingham Airport, Liverpool John Lennon Airport or Bristol Airport since the 2025 Review Hearing.

7.2 I exhibit at **Exhibit AJW9** 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 AJW10**;

(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 8.2), 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 AJW11**.

(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 AJW12**.

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 AJW13**.

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 AJW14**, 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 <u>*Take Back Power*</u>

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 AJW15**).

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 AJW16**).

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 AJW17**.

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: • 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 AJW18**.

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 the subject airports because:

8.2.5.1 there are private jet facilities at all of the subject airports 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 AJW19**); 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 their airports will become the focus of direct action by members of Take Back Power, given the presence of private jet facilities at their respective airports, 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 AJW20**.

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 AJW21**.

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	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

	compound at Holybourne		the Court continued the injunction. A further review hearing has been listed to be heard on 22 July 2026.

11. **DETERRENT EFFECT OF THE INJUNCTIONS**

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 Orders. In asking the Court to continue the injunctions granted by the 2024 Orders, 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 the airports in question.

11.2 Noting the continued lack of direct/unlawful protest activity at the airports in question, 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 injunctions 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 injuncted 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 AJW22**.

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 Kristin Garrett, General Counsel for Birmingham Airport, John Irving, Chief Executive Officer of Liverpool John Lennon Airport, and Graeme Gamble, Chief Operating Officer of Bristol Airport that the Claimants are not aware of the identity of any individuals who threaten to engage in direct/unlawful protest activity at their respective airports.

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 AJW23**. 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 Kristin Garrett, General Counsel for Birmingham Airport, John Irving, Chief Executive Officer of Liverpool John Lennon Airport and Graeme Gamble, Chief Operating Officer of Bristol Airport that the Claimants' directors have concluded that they should respectfully request the Court to order that the injunctions remain in full force and effect, subject to a review in 12 months' time as provided by the 2024 Orders. I understand that they reached this decision 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 injunctions are 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 the subject airports and/or causing a private or public nuisance on or around them if the injunctions 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 injunctions have 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 their respective airports. It is for this reason that they seek the injunctions 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 5 of the 2024 Orders – 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 Orders 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;

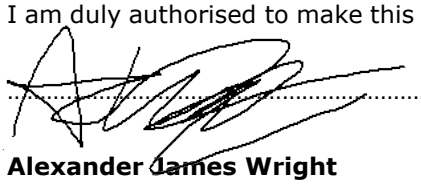
15.1.2.3 campaigner@fossilfreelondon.org and operations@fossilfreelondon.org which are understood to be linked to Fossil Free London; and

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 each 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

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS 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.

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(1) BIRMINGHAM AIRPORT LIMITED
AND FIVE OTHERS

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
06 Aug 2024
KB-2024-002473

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).

BEFORE THE HONOURABLE MR JUSTICE JACOBS

ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

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

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Birmingham Airport, as defined by this Order, should be made by email to protestrequest@birminghamairport.co.uk

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Birmingham Airport**" means the land outlined in red on Plan 1 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Birmingham Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.Birminghamairport.co.uk/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. Affixing a Warning Notice approximately at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.Birminghamairport.co.uk/injunction.

9. The Court will provide sealed copies of this Order to the First Claimant's solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone 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 First Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.

13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FIRST CLAIMANT

16. The First Claimant's solicitors and their contact details are:

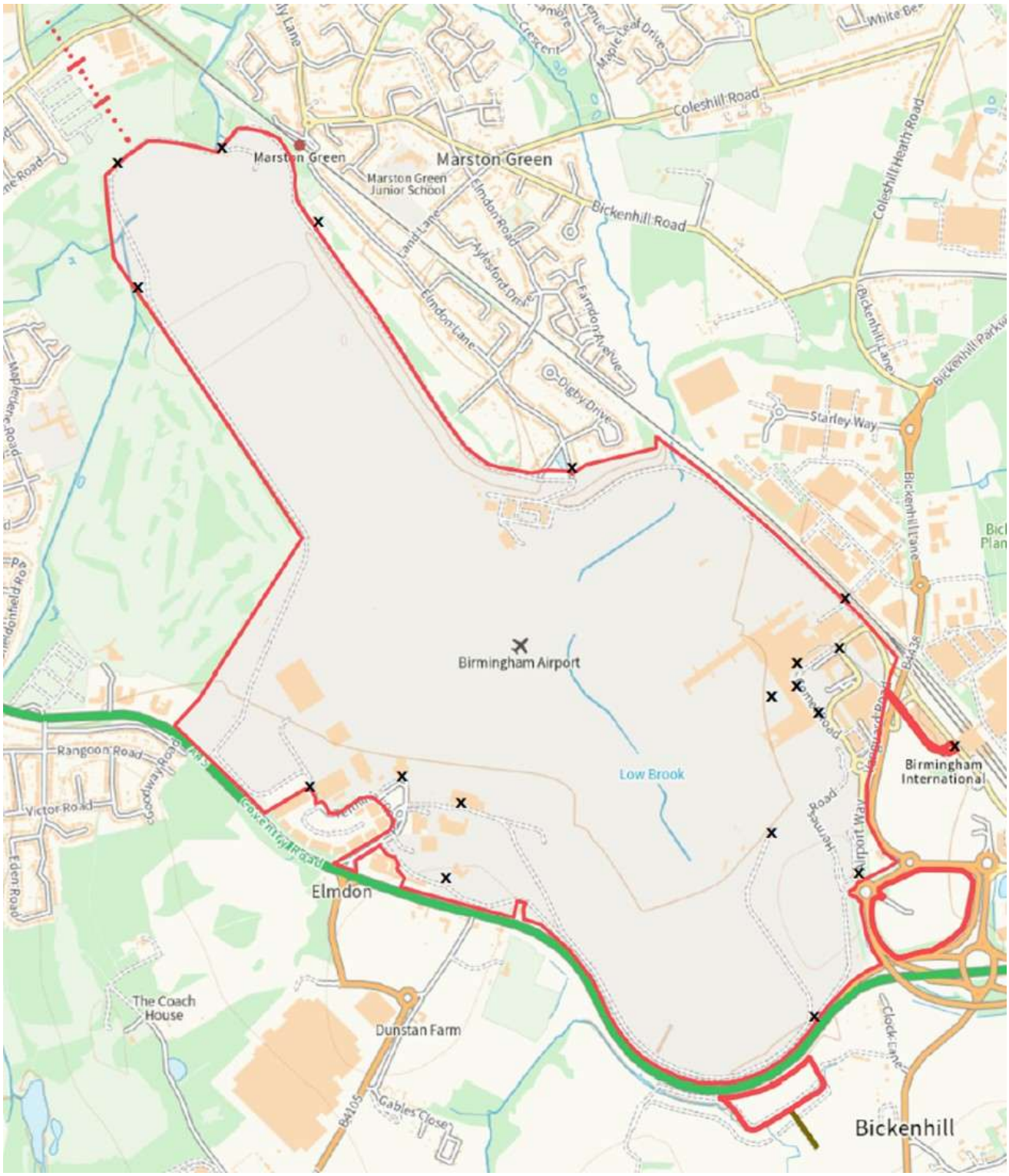
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Marston Green
Marston Green
Marston Green Junior School
Coleshill Road
Bickenhill Road
Elmdon Road
Sand Lane
Aylesford Drive
Elmdon Lane
Farndon Avenue
Digby Drive
Coleshill Heath Road
Bickenhill Lane
Starley Way
Birmingham Airport
Low Brook
Rangoon Road
Victor Road
Goodway Road
Eden Road
Elmdon
The Coach House
Dunstan Farm
B4105
Gables Close
Birmingham International
Bickenhill

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Birmingham Airport Limited (the "**First Claimant**")

This notice relates to the land known as Birmingham Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

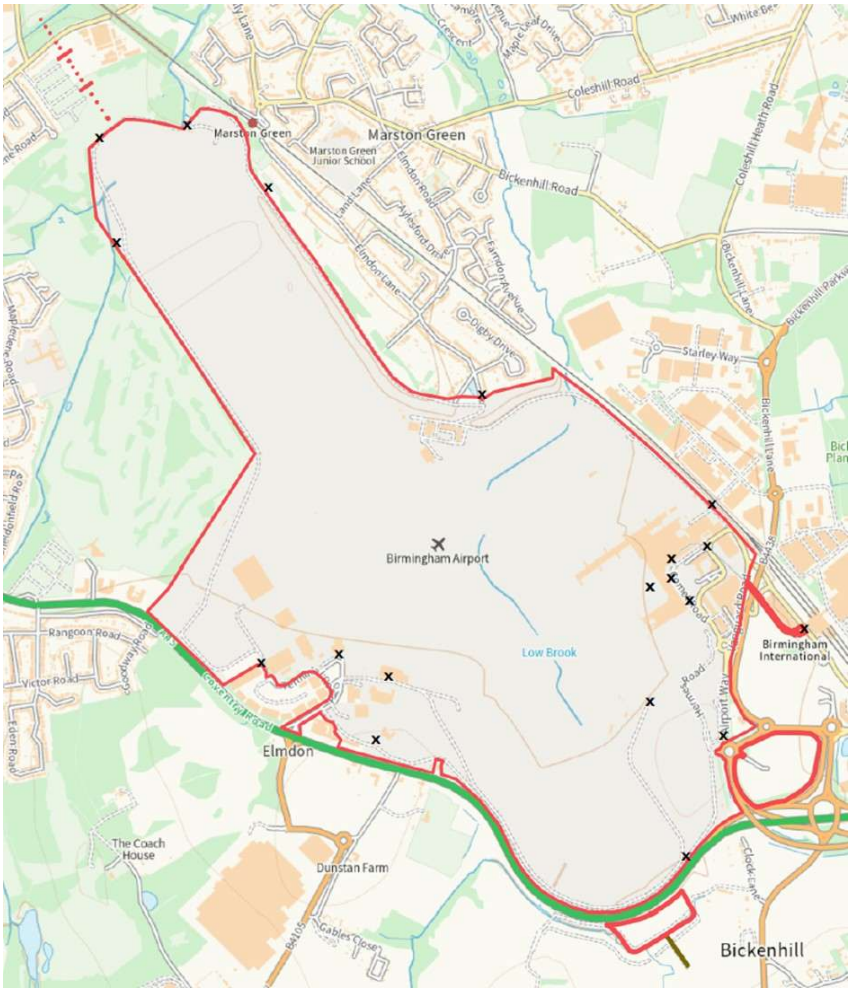
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at: https://www.Birminghamairport.co.uk/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED

AND FOUR OTHERS

Claimants



- v -

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

KB-2024-002473

AND TWO OTHERS

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).

BEFORE THE HONOURABLE MR JUSTICE JACOBS

ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

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

AND UPON the Second and Third Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Liverpool Airport, as defined by this Order, should be made by email to protestrequest@liverpoolairport.com

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Liverpool Airport**" means the land outlined in red on Plan 2 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of Liverpool Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second and Third Claimants.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.liverpoolairport.com/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. Affixing a Warning Notice approximately at those locations marked with an "X" on Plan 2 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.liverpoolairport.com/injunction.

9. The Court will provide sealed copies of this Order to the Second and Third Claimants' solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone 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 Second and Third Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Second and Third Claimants' solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second and Third Claimants' solicitors.

13. The Second and Third Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE SECOND AND THIRD CLAIMANTS

16. The Second and Third 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

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Liverpool Airport - Plan 2
N
Map scale 1:11,000
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

1760

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND AND THIRD CLAIMANTS

(1) The Second and Third 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

KB-2024-002473 High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Liverpool Airport Limited and Peel L&P Investments (North) Limited (the "**Second and Third Claimants**")

This notice relates to the land known as Liverpool Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second and Third Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Second and Third Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at: https://www.liverpoolairport.com/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

AND THREE OTHERS

Claimants

- v -

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

HIGH COURT OF JUSTICE
06 Aug 2024
QUEEN'S BENCH DIVISION

KB-2024-002473

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).

BEFORE THE HONOURABLE MR JUSTICE JACOBS

ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

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

AND UPON the Fourth, Fifth and Sixth Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Bristol Airport, as defined by this Order, should be made by email to protestrequest@Bristolairport.com

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Bristol Airport**" means the land shown outlined in red on Plan 3 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Bristol Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Fourth, Fifth and Sixth Claimants.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.Bristolairport.com/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. Affixing a Warning Notice approximately at those locations marked with an "X" on Plan 3 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.Bristolairport.com/injunction.

9. The Court will provide sealed copies of this Order to the Fourth, Fifth and Sixth Claimants' solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone 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 Fourth, Fifth and Sixth Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Fourth, Fifth and Sixth Claimants' solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Fourth, Fifth and Sixth Claimants' solicitors.

13. The Fourth, Fifth and Sixth Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FOURTH, FIFTH AND SIXTH CLAIMANTS

16. The Fourth, Fifth and Sixth 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

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Bristol Airport - Plan 3
N
Downside
Lulsgate Bottom
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

SCHEDULE 2 – UNDERTAKINGS GIVEN BY THE FOURTH, FIFTH AND SIXTH CLAIMANTS

(1) The Fourth, Fifth and Sixth 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Bristol Airport Limited, South West Airports Limited and Bristol Developments Limited (the "**Fourth, Fifth and Sixth Claimants**")

This notice relates to the land known as Bristol Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Fourth, Fifth and Sixth Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fourth, Fifth and Sixth Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at: https://www.Bristolairport.com/injunction.

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS 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.

Claim no: KB-2024-002473

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) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORT LIMITED
(6) BRISTOL AIRPORT DEVELOPMENT LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

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 6 August 2024 by Jacobs J ("**the Jacobs J Order**")

AND UPON the Claimants' application dated 2 June 2025

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 Jacobs J Order

IT IS ORDERED that:

1. The Jacobs J Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 2 of the Jacobs Order).

2. Paragraph 2 of the Jacobs J Order is amended so as to read:

"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 the Claims, 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. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS 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.

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)

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 Dienne 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

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS 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

Birmingham Airport Injunction Order

On 6 August 2024 the High Court granted Birmingham Airport Limited an injunction, which prohibits anyone from entering, occupying or remaining upon any part of Birmingham Airport for the purpose of protesting about fossil fuels or the environment without our permission.

Anyone found to be in breach of the Order could be sent to prison, fined or have assets seized for contempt of Court.

Documents relating to the Injunction and hearing on 6 August 2024 can be found on the links of this page:

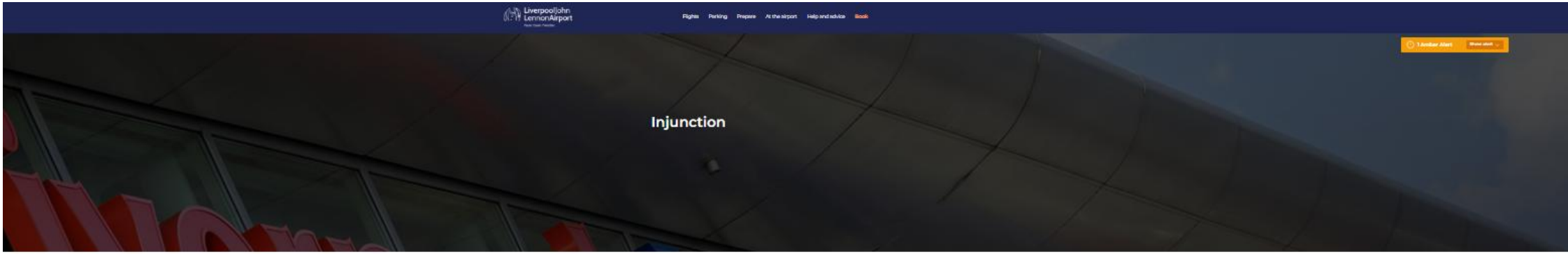
- Sealed Order
- Sealed Order granting permission to amend Claim Form
- Amended Claim Form
- Plan 1 to the Claim Form
- Amended Particulars of Claim
- Plans 1A and 1B
- Hearing Bundle
- Skeleton Argument
- Note of the Hearing

On 24th June 2025 the High Court extended the injunction

- Sealed Order

Documents relating to the Injunction Review hearing on 24th June 2025 can be found below:

- Supplemental Hearing Bundle
- Airports - Skeleton
- Airports - Chronology
- Airport Injunction Renewal



Liverpool John Lennon Airport injunction

On 6 August 2024, the High Court granted the airport an injunction which prohibits anyone from entering, occupying or remaining on Liverpool Airport in connection with any fossil fuel or other environmental campaign.

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

Documents relating to the Injunction can be found on this page via the links below:

1. the Sealed Order
2. the Sealed Order granting permission to amend Claim Form etc.
3. the Amended Claim Form
4. Liverpool Airport – Plan 2
5. the Amended PoC
6. the Hearing Bundle (Part 1 | Part 2)
7. the Skeleton Argument
8. the Note of the Hearing

On 24 June 2025 the High Court extended the injunction:

1. the Sealed Order
2. the Injunction renewal

Documents relating to the Injunction Review Hearing on 24th June 2025 can be found below:

1. the Supplemental Hearing Bundle
2. the Claimants' chronology
3. the Claimants' skeleton argument



Bristol Airport Injunction

On 6 August 2024, the High Court granted Bristol Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on Bristol Airport (as shown in Bristol Airport-Plan3 attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign or protest groups) without the consent of Bristol Airport Limited.

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

On 24 June 2025 the High Court extended the injunction.

Documents relating to the Injunction and the Hearing on 6 August 2024 can be obtained using the links below:

The Sealed Order dated 6 August 2024

The Sealed Order granting permission to amend claim form dated 7 August 2024

The Sealed Order granting permission to change the Bristol Airport Injunction web address dated 12 August 2024

The Amended Claim form

Bristol Airport-Plan 3

Amended PoC

The Hearing Bundle (Part 1)

The Hearing Bundle (Part 2)

The Skeleton Argument

The Note of the Hearing

Documents relating to the Injunction Review Hearing on 24 June 2025 can be found below:

BHX N244 Renewal 02.06.25 Part 1

BHX N244 Renewal 02.06.25 Part 2

Sealed Order 24.06.25

The Skeleton Argument

Chronology

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
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(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

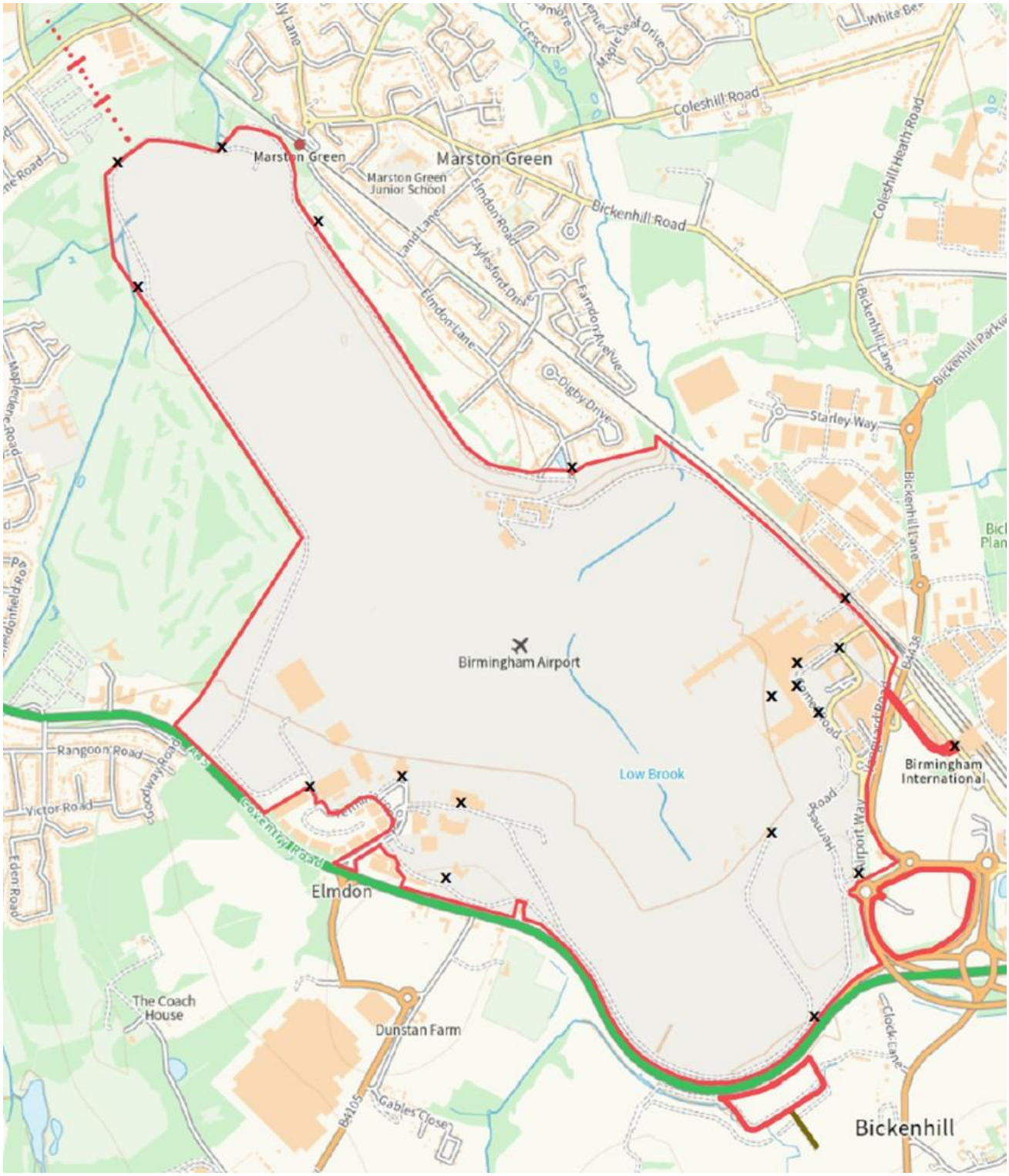
Defendants

AJW5

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

Liverpool Airport - Plan 2




Marston Green
Marston Green Junior School
Coleshill Road
Bickenhill Road
Elmdon Road
Aylesford Drive
Farndon Avenue
Elmdon Lane
Digby Drive
Coleshill Heath Road
Bickenhill Lane
Starley Way
Birmingham Airport
Low Brook
Rangoon Road
Victor Road
Coventry Road
Elmdon
The Coach House
Dunstan Farm
Gables Close
B4105
Hermes Road
Airport Way
Birmingham International
Clock Lane
Bickenhill


Bristol Airport - Plan 3
N
Downside
Lulsgate Bottom
ORBITAL WITNESS
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CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
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(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS 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: Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport Injunction - Order from 2025 Review Hearing (24 June 2025)
Attachments: Bristol Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329812.1).pdf; Liverpool Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329806.1).pdf; Birmingham Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329811.1).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 injunctions granted in these proceedings by Order dated 6 August 2024 by Jacobs J.

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 each 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
Birmingham Airport	KB-2024-2473	Injunction | Birmingham Airport Website
Liverpool John Lennon Airport		Liverpool John Lennon Airport
Bristol Airport		Bristol Airport Injunction

Regards

Alex Wright | Legal Director | Real Estate Disputes | Eversheds Sutherland

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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: Birmingham Airport, Liverpool John Lennon Airport and Bristol Airport Injunction - Order from 2025 Review Hearing (24 June 2025)
Attachments: Bristol Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329812.1).pdf; Liverpool Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329806.1).pdf; Birmingham Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329811.1).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 injunctions granted in these proceedings by Order dated 6 August 2024 by Jacobs J.

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 each 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
Birmingham Airport	KB-2024-2473	Injunction | Birmingham Airport Website
Liverpool John Lennon Airport		Liverpool John Lennon Airport
Bristol Airport		Bristol Airport Injunction

Regards

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Helping our clients, our people and our communities to thrive

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

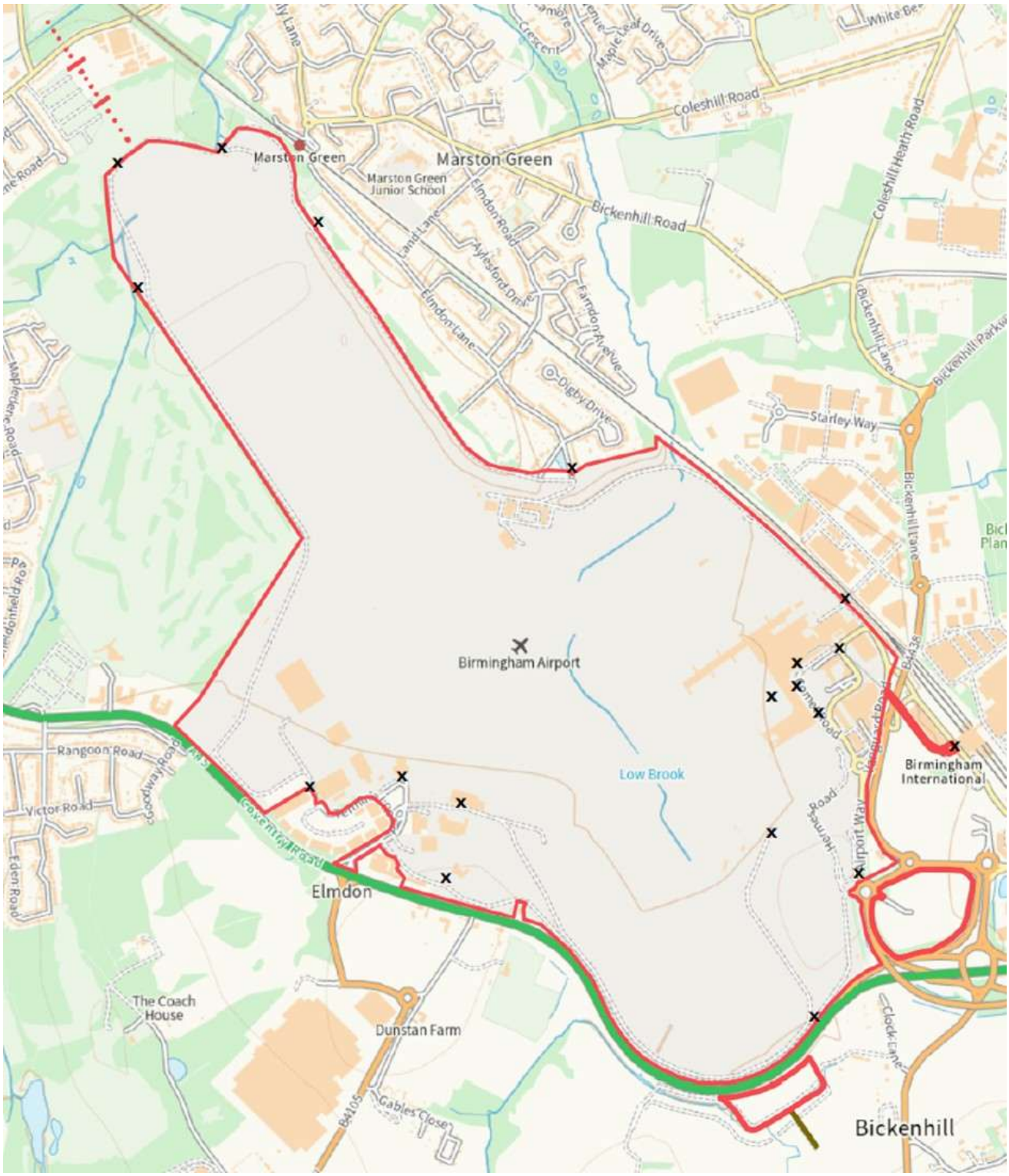
- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW7

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


Marston Green
Marston Green
Marston Green Junior School
Coleshill Road
Bickenhill Road
Coleshill Heath Road
Bickenhill Lane
Starley Way
Digby Drive
Farndon Avenue
Elmdon Road
Elmdon Lane
Birmingham Airport
Low Brook
Birmingham International
Rangoon Road
Victor Road
Elmdon
The Coach House
Dunstan Farm
Gables Close
Bickenhill


Liverpool Airport - Plan 2
N
Map scale 1:11,000
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024


Bristol Airport - Plan 3
N
Downside
Lulsgate Bottom
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

CLAIM NO: KB-2024-002473

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Defendants

AJW8

This is the exhibit marked "AJW8" 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)		

■

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Claimants

- v –

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Defendants

AJW9

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

Incidents from July 2025

Date of Event/press	Location	Brief details of event etc.	Link to source of informations
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.whtimes.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/dGFnOnJldXRlcnMuY29tLDIwMjY6bmV3c21sX01UMVNJUEEwMDBPRjlXU1k
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."



Extinction Rebellion outside Aviva, Pear Street, Sheffield.

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.

■

Not in the UK? Visit the Global Website.

Change Font



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 it's 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

Media enquiries:
insureoursurvival@gmail.com
XR UK press team: press@extinctionrebellion.uk, 07756136396

For immediate release

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

Over the past 12 months, IOS has coordinated more than 150 actions, targeting 27 insurance firms in over 40 towns and cities. Now, the momentum is accelerating. From 2–14 July, a UK-wide Wave of Action will ramp up pressure on the insurers enabling climate destruction. Across the country, activists will expose the "dirty insurers" underwriting and brokering some of the world's most devastating fossil fuel projects—including the East African Crude Oil Pipeline (EACOP), Mozambique LNG, Arctic LNG 2, and Papua LNG.

Fossil fuel companies cannot operate without insurance. That makes insurers the hidden enablers of climate breakdown—profiting from disaster while claiming neutrality. But they're no longer in the shadows. They are a critical weak link in the fossil fuel chain—and campaigners are stepping up to break it.

GLOBAL PROJECTS, LOCAL CONSEQUENCES

EACOP is already displacing thousands in Uganda and Tanzania, violating human rights, threatening food and water supplies, and endangering protected ecosystems. LNG projects in Papua New Guinea, Mozambique, and the Russian Arctic are linked to militarisation, the destruction of Indigenous lands, and irreversible ecological damage [1, 2, 3, 4]. These are just a few of the 400+ carbon bombs currently in development [5].

But the impacts aren't confined to distant places.

"By backing these fossil fuel projects, insurers are not only fuelling climate breakdown and human rights abuses—they're also making life harder here in the UK," said Lucy Porter, a spokesperson for Insure Our Survival.

"When extreme weather floods our homes, when food prices surge, and when small businesses can no longer afford insurance, we must ask: who is enabling this chaos? Insurers who continue to underwrite new oil, gas, and coal projects are complicit—not just in destruction abroad, but in rising suffering at home."

LOCAL ACTION, GLOBAL RESISTANCE

Throughout the Wave of Action, communities across the UK will organise creative and disruptive protests outside the offices of targeted insurers and brokers. From city centres to rural high streets, IOS is calling on people to make visible the connection between fossil fuel insurance and the cost of climate chaos.



“Insurance giants like Lloyd’s, Liberty Mutual, AIG, Tokio Marine, Brit, Chaucer, and brokers like Marsh have the power to stop destructive fossil fuel projects like EACOP—but instead, they choose to back industries driving climate collapse, human rights abuses, hunger, war, and displacement.

Right now, 11 climate activists in Uganda have been brutally detained for speaking out against EACOP’s new funders. While insurers protect the profits of the richest 1%, communities around the world are paying the price—facing deadly heatwaves, floods, droughts, and devastation.

How long must we raise the alarm before they act? It’s time they chose people over profit, justice over destruction, and life over collapse. We can’t escape to Mars. This is our only home—and we will not stop fighting for it.”
— *Nicholas Omonuk, End Fossil Occupy Uganda*

WHAT’S NEXT: A GLOBAL ESCALATION

Following the UK Wave of Action, IOS will launch its international phase—escalating and expanding efforts worldwide. The campaign will work with global activists to confront dirty insurers and brokers in every region, turning scattered actions into a united front against the industry’s role in climate injustice.

“We don’t have 20 years to stop these projects. We barely have time to avoid irreversible collapse,” said Porter. “That’s why we’re escalating now—together, across borders, communities, and every dirty insurer’s threshold.”

📣 TAKE ACTION

- **Join the IOS Telegram** for updates, action support, and resources: https://t.me/+wV2EEWPpMJtlMzQ0
- **Visit the IOS website** and sign up to get involved: InsureOurSurvival.org
- **Socials**
  Instagram: https://xrb.link/GA8tN8nk5
  Bluesky: https://xrb.link/jz6Y7618
- **Media enquiries:** insureoursurvival@gmail.com

References

[1] ‘Monstrous’ east African oil project will emit vast amounts of carbon, data shows

[2] Death, violence and endless delay: Inside Africa’s most troubled energy project

[3] Explainer: Russia’s ambitions and challenges in Arctic

[4] More banks rule out support for TotalEnergies’ Papua LNG project

[5] Carbon bombs under the spotlight

London Oxford Airport: Extinction Rebellion to hold protest

Oxford Airport

Environmentalists at Extinction Rebellion will be protesting at London Oxford Airport near Kidlington against private jets.

The group claim it is the “most energy-intense form of flying” at the airport formerly known as Kidlington Airport, claiming each jet will emit “substantially more carbon per passenger than commercial flights”.

Taking place on Saturday, July 5, protesters will assemble at 10am for a march from the west end of Kidlington High Street to the entrance of the airport.

They say the demonstration will be peaceful.

It comes after protesters from Palestine Action were widely condemned by national politicians after breaking into RAF Brize Norton overnight on Thursday, June 19 and sprayed red paint into the engines of two Airbus Voyager aircrafts and onto the runway.

This prompted Prime Minister Sir Keir Starmer to condemn the actions of the protesters as "disgraceful".

He added: "Our Armed Forces represent the very best of Britain and put their lives on the line for us every day. It is our responsibility to support those who defend us."

Now another stunt is planned in the county by the Extinction Rebellion group.

A file image of Extinction Rebellion protesters. Image: PA Freya Chambers, an activist with Extinction Rebellion Oxford, said: “As global temperatures continue to rise, now is the time to drastically cut emissions – starting with luxury private flights.

“Instead, the UK is now being hailed as the private jet capital of Europe.

“Oxford Airport is a hub for private flights by the wealthy elite, while the local community pays the price in pollution and an accelerating climate crisis.”

She added: “According to Civil Aviation Authority data, 13,774 private flights went to or from Oxford Airport in 2024.

“This is an average of 38 private jets every single day. At least 28 per cent of those were empty of passengers.

“These private jets are used like taxis by the super-rich to make short, one-way journeys within the UK and Europe.

“Globally, almost half of all private flights in 2023 were shorter than 500 km - that’s about the same as London to Edinburgh - and Oxford follows this trend.”

A general view of London Oxford Airport. Picture: Richard Cave She said the group is calling for an end to private jet travel, and that the increase in air passenger duty for domestic private jet travel introduced by the government “is not enough”.

“We need decisive action to decarbonise aviation, starting with stopping unnecessary private flights that only benefit the wealthy one per cent,” she added.

Thames Valley Police and Oxford Airport have both been contacted for further comment on the planned protest.

■

Extinction Rebellion protest outside insurance brokers



Members of XR North Lakes are out on the streets of Penrith today, protesting outside the offices of insurance broker Marsh.

The placard-waving protestors are taking part in a national day of action against insurance businesses which they say are "enabling" the fossil fuel industry by insuring high profile global projects.

Protests also took place at the offices of Marsh Commercial in Carlisle and Kendal.

Allan Todd, former teacher and climate activist, of Keswick, said: "Marsh is one of a number of insurance brokers which continue to facilitate fossil-fuel projects that drive the climate and ecological crises.

"Our action today is also part of the wider Road to Belem campaign, run by the Climate Justice Coalition in the run-up to COP30. We need to act now to avert the worst impacts of climate change and make the planet as habitable as possible for future generations."

This national week of action will be followed by an international wave of action in September, in solidarity with activists on the front line of the new oil and gas projects.
■

extinction rebellion
SCOTLAND

EXTINCTION REBELLION SCOTLAND AND SCIENTIST REBELLION DENMARK PROTEST PRIVATE JETS COMPANY, BLACKBIRD

February 16, 2025

Extinction Rebellion Scotland and Scientist Rebellion Denmark protested at Inverness Airport in Scotland and Billund Airport in Denmark. They were highlighting the contradictions between Blackbird Air's CEO Anders Povlsen private jets enterprise and his Wildland commitment to nature.



Credit: Siobhan Chalmers @_schal

Protesters waved banners outside Inverness Airport in Scotland declaring 'Ban Private Jets' and 'Blackbird Nae mAir' accompanied by others dressed as "blackbirds". A huge banner was laid on the ground with words from the Wildland Ltd. company website "We're in a climate emergency. We need to step up and take action".

Watch Chris Packham's message to the protest.

The protestors were calling for Anders Povlsen "to step up and take action", close down Blackbird Air and invest in clean transportation.

The protests were connected by an innovative two-way live link displayed on monitors at both Inverness Airport and at the Blackbird HQ in Billund Airport Denmark.

XR Scotland and SR Denmark call into account the contradictory behaviours of a so-called "eco-billionaire". One of the largest landowners in Scotland, Povlsen owns Blackbird Air, a luxury private jet business which is set to expand. At the same time Povlsen operates Wildland, a private enterprise which acknowledges the urgent need to act on the climate emergency.



Credit: Siobhan Chalmers @_schal

The use of private jets has soared in recent years, with the resulting climate-heating emissions rising by 50%. Passengers in larger private jets caused more CO2 emissions in an hour than the average person did in a year. Aviation fuel remains untaxed while those using a car to get to work pay their taxes at the pumps.

The aviation industry is promoting Sustainable Aviation Fuel (SAF) but the UK SAF mandate only requires that 2% of the UK's total jet fuel demand be met by SAF in 2025, increasing to 10% in 2030. SAF is always blended with fossil fuels as around 65% of so-called sustainable fuel is kerosene.

However, some airlines and countries are changing. The Danish company, Lego, is closing its private jet division this year. Amsterdam's Schiphol airport announced a ban on private jets in April 2023. Belgium has introduced new taxes on private jets and France is expected to follow.

Dr Sarah Birkby from Extinction Rebellion Highlands and Islands and Moray said:
'It is completely contradictory to state the importance of acting on the climate emergency and at the same time run a private jet company. The time when people, no matter how rich, could say one thing and do the exact opposite is over. As Wildland Ltd itself declares, we need people to step up and take action".

Dr Anthony Graham from Scientists for Extinction Rebellion stated:
"The evidence is clear: our current emissions pathway is incompatible with a safe planet. Every tonne of CO_2 fuels climate change, yet private jets – used by the wealthiest 0.003% – emit disproportionate amounts, worsening both the climate crisis and inequality. Scientists for Extinction Rebellion urge action on luxury emissions, stressing that those with the most power must lead by example."

Finlay Asher, a spokesperson for Safe Landing, a global community of aviation workers, said:
"At Safe Landing, our aviation community are firmly of the position that there needs to be a rapid reduction in private jets in favour of cleaner and greener forms of travel. And as a Scottish aerospace engineer, I'd love to see Scotland lead the way and pioneer the genuinely sustainable future of flight. Rather than catering to carbon-intensive flying for an elite minority, Inverness Airport could instead become our green gateway for essential island air travel."

Alex Cochrane from Extinction Rebellion Scotland said:
"Private jets are the quickest way to burn fossil fuels and produce on average 10 times more CO_2 emissions per passenger than commercial flights. Though Blackbird Air states on their website 'Our private jets feature the latest safety innovations and energy-efficient engines', the aviation industry expects worldwide another 8,500 private jets will enter service by 2033 (including Blackbird), far outstripping any efficiency gains."



Climate Activists Detained at the “Oscars of the Insurance Industry”

July 09, 2025 by Extinction Rebellion

Early images

“INSURING DISASTER, NOT SURVIVAL”

LONDON 9th July — Climate activists with the Insure Our Survival campaign disrupted the “Oscars of the insurance industry” British Insurance Awards at the Royal Albert Hall tonight, calling out the industry for profiting from climate chaos and genocide in Gaza, while pushing ordinary people to the brink.

Two activists were detained for several hours after getting into the venue and planning to take to the stage to drop a banner. Both have now been released and stand by their actions, saying: "Stop funding ecoside. Stop funding genocide."

As the insurance elite gathered to celebrate their accomplishments this year, activists outside held a die-in on the red carpet, making it hard for attendees to enter. They added a theatrical "F***ing Up the Planet Awards" mocking the biggest insurers for backing oil pipelines, displacing communities, insuring arms exporters and ignoring the climate science.

"These companies talk about resilience, but they're the ones insuring oil pipelines while dropping cover for flood-hit homes," said Lucy Porter, a spokesperson for Insure Our Survival. "They're not part of the solution — they're complicit in the collapse."



Photo credit: Denise Baker

The income made for those in the industry does not come without a cost, at home and abroad. Even in their own communities, we are seeing flooding and destruction of homes. 5.7 million properties in England are currently at risk of flooding [1]. In 2024 alone, the UK saw over £1.6 billion in insured flood losses, with thousands of families displaced [2]. In Yorkshire, Cumbria, and South Wales, some households now face £2,000+ annual flood insurance premiums — or have been refused coverage entirely [3]. Meanwhile, insurers continue to back new fossil fuel infrastructure that worsens

the crisis, including the East African Crude Oil Pipeline (EACOP) and Arctic LNG 2 [4] [5].

AXA and Allianz have come under fire for financial and insurance ties to firms complicit in the Israeli occupation of Palestine, including companies supplying bulldozers, weapons, and surveillance tech used in home demolitions and military operations [6] [7].

“They insure against the destruction of homes abroad, and then leave homes here unprotected,” said another campaign spokesperson. “Their business model is a disaster — so long as it doesn’t affect their balance sheets.”

BRITISH INSURANCE AWARDS: A CELEBRATION OF CLIMATE HYPOCRISY

While the British Insurance Awards claim to reward “innovation and responsibility,” many winners continue to underwrite fossil fuel expansion — a direct violation of international climate goals [8].

Insurers and brokers being called out include:

- Lloyd’s of London — still insuring coal, tar sands, and Arctic oil through its syndicates [9].
- Chubb, AIG — major underwriters of extreme oil and gas projects around the world [10].
- AXA — linked to fossil fuel underwriting and arms-related human rights concerns [6].
- Marsh McLennan — brokers fossil fuel deals including pipelines and coal plants [11].

Many insurers at the British Insurance Awards — including Allianz, Aviva, AXA, Zurich, AIG, RSA, Chubb, QBE, and Liberty Mutual — are not only complicit in climate chaos, but also profit from militarised violence.

They insure or invest in companies supplying military equipment to Israel, including:

- Boeing
- Lockheed Martin
- Elbit Systems
- Maersk (used in military logistics) [12][13][14]

INSURE PEOPLE, NOT POLLUTION

This crisis is personal. Flooding, fires, and heatwaves are here, and insurers are abandoning households while enabling destruction abroad.

It's time to turn public anger into action.

👉 Join the campaign. Demand insurers drop fossil fuels.
👉 Expose their hypocrisy.
👉 Insure our survival — not collapse.

🔗 **[Insure our Survival website]**

NOTES FOR EDITORS

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Extinction Rebellion target Howden and Marsh offices in Shrewsbury

'We need insurers to stop making things worse and step up to be climate heroes,' says protester

Extinction Rebellion targeted the offices of brokers Marsh and Howden in Shrewsbury in an insurance-related protest.



The group went to Marsh's office in Abbey Foregate at 10am on 11 July 2025, before marching up Wyle Cop to visit Howden's branch on the High Street.

The protest was related to fossil fuels, with protesters calling for the support of new projects to be ended. It featured placards, banners and a Grim Reaper,

One protester said: "Here in Shrewsbury we're already feeling the effects of climate breakdown.

"Shropshire farmers are struggling with the current drought. Homes and businesses are suffering as once in a hundred year floods now happen annually.

“We need insurers to stop making things worse and step up to be climate heroes.”

Other protest

The protest came amid supporters of Extinction Rebellion’s Insure our Survival campaign targeting the offices of insurance companies up and down the country in a national wave of action last week.

During the week, Marsh’s Manchester office in Belvedere, Booth Street, was also targeted, with protesters holding a large Stop Eacop (East African Crude Oil Pipeline) banner.

Eacop is a pipeline that is set to transport oil produced from Uganda’s Lake Albert oilfields to the port of Tanga in Tanzania.

One protester said: “We are already seeing the catastrophic effects of climate chaos on our TV screens.

“Instead of displacing poor people to pipe oil across Africa so that big oil can make even more money, we should be leaving it in the ground. Our message is simple – oil companies need to stop drilling and start paying.”

■

Rebels target insurance HQ in solidarity with detained Ugandan protesters - Extinction Rebellion UK



Rebels target insurance HQ in solidarity with detained Ugandan protesters

July 16, 2025 by Extinction Rebellion

Press contacts: Dorothea Hackman 07710 269195 | XR UK press team 07756136396

BREAKING PHOTOS | PERMANENT ARCHIVE

Extinction Rebellion rebels target AIG as part of a national wave of Insure Our Survival actions against insurance companies fanning the flames of climate risk.

At 12 noon today, July 16th, 2025, protesters were at the offices of AIG in Fenchurch Street, London, demanding it does not insure the East Africa Crude Oil Pipeline (EACOP).

Two letters were delivered – one on behalf of local people directly affected by EACOP and another from the #StopEACOP campaign UK.



Outside AIG, activists in red #StopEACOP suits held a die-in by an EACOP pipeline, and others waved fans declaring 'FANNING THE FLAMES OF CLIMATE RISK' while throwing documents entitled 'UNDERWRITING FOSSIL FUELS' and 'INVESTING IN FOSSIL FUELS' into a mock fire.

Zaki Mamdoo, Campaign Coordinator at StopEACOP said: "Activists and defenders outside AIG's offices today stand shoulder-to-shoulder with communities whose lands, livelihoods, and futures have been sacrificed for the EACOP, its associated projects and the repressive conditions that have followed. This demonstration is a reminder that the destruction we face is not accidental; it is the result of a global system that prioritises profit over people, and places corporate power above human life. The struggle for climate justice demands that ordinary people everywhere confront the institutions responsible for this harm because those causing it operate globally, and so must our resistance."

73-year-old retired lecturer and grandmother from Camden Dorothea Hackman said: **"**Insurance companies like AIG wield immense power and could bring an end to the fossil fuel era. Instead, they collude with short-term profiteering polluters and fan the flames of climate risk."

As a result of global pressure, including from Extinction Rebellion, Insure our Future and the StopEACOP campaign [1], 30 major insurers have pulled out of EACOP to date[2]. However, AIG has still to rule out insuring EACOP.

EACOP is a 'carbon bomb' [3], which would unleash 379 million tons of climate-heating pollution – more than 25 times the combined annual emissions of Uganda and Tanzania the host nations. [4] This will fuel extreme weather worldwide and intensify deadly flooding, landslides, heatwaves, and droughts that are already frequent even in the UK [5].

Insurers are complicit in the climate crisis as oil, gas, and coal industries are legally obliged to insure their operations.

In addition to profits from underwriting insurance, client premiums represent immense funds for insurance companies like AIG – globally, £27 trillion of assets are under management, with UK insurers having £1.8 trillion, and much of this is invested in fossil fuels. [6,7]

This is an unsustainable contradiction. While their investment and underwriting continue to give a lifeline to the fossil fuel companies, already over a third of weather-related claims are for climate-attributed losses.[8]

Meanwhile, climate change is doubling or even tripling the cost of home insurance for ordinary homeowners [9] and coverage is denied to many households impacted by climate change.[10]

Yet the size of the renewable energy insurance market is still under 30 per cent of the fossil fuel insurance market.[11] This mismatch of priorities is an obstacle to the urgently needed transition to clean energy. [12]

EACOP has already displaced thousands of families in Uganda and Tanzania and is threatening food and water security and violating human rights, while disturbing critical ecosystems including Lake Victoria and Murchison Falls National Park [13, 14].

TotalEnergies, the majority shareholder and investor of EACOP, is accused by the UN special rapporteur on environmental defenders of 'grave human rights violations against those opposing the projects and against the local communities, particularly in Kingfisher'. [15]

At time of writing, 11 activists, the KCB11, have been detained and refused bail for 84 days for attempting to deliver a letter to Kenya Commercial Bank in Kampala.

"It's hard to imagine a more vivid picture of corporate-state collusion than activists being led into a trap and arrested for trying to share their concerns about a fossil fuel project characterised by rights and environmental harms," said Brad Adams, Executive Director at Climate Rights International.[16]

These national days of action in July will be followed by a wave of international action in September, in solidarity with activists on the front line of new oil and gas projects.

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■

Reading: Extinction Rebellion protest above A329 motorway

The Tax the Rich banner by Extinction Rebellion activists dropped above the A329M between Reading, Wokingham and Bracknell. *(Image: Extinction Rebellion)*

Two mystery banners were seen on a bridge over a busy motorway.

The banners above the A329M bore the slogan 'Your Planet Needs You' while the other said 'Tax the Rich,' and both have since been claimed by Extinction Rebellion.

"Heatwaves are becoming fiercer and more frequent, and not addressing the climate crisis will be far more costly than tackling it," said an Extinction Rebellion spokesperson.

"There is also a growing call for the super-wealthy to be taxed. According to Oxfam, a 2% tax on extreme wealth over £10 million could raise £24 billion every year.

"78% of the British public say they support this. Money raised could supercharge the UK's efforts to tackle climate change."

Greenpeace has called for a one-off "National Renewal Tax" of 2.5% on individual wealth above £10m, to be paid annually over the five years of this parliamentary term, which could raise between £130bn and £183bn. This tax would be paid by 0.1% of the UK population.

The National Renewal Tax on the super-rich could raise between £26bn and £36.6bn on average each year.

"Funds raised would be 'more than enough' to pay for insulating homes, supporting vulnerable households with winter energy bills, providing free bus travel to under 25s, implementing a scrappage scheme for polluting vehicles, retraining works for green energy jobs, upgrading ports, and supporting farmers to clean up waters and return land to nature," the spokesperson said.

"According to a new report, the potential UK economic losses by 2040 due to stranded fossil-fuel assets is £113bn.

"Of the £88bn held in fossil fuel assets by UK pension funds, around £15.2bn is at risk of stranding by 2040.

"Yet BP and Shell are backing off from their 'green' promises, and other fossil fuel companies are still pushing ahead with projects."

A growing number of climate groups are campaigning for the introduction of a wealth tax.

The Pay Up campaign is calling on the government to bring in a series of wealth taxes as an alternative to spending cuts.

Climate groups say the revenue from the ultra-rich could fund investment, restore crumbling public services and help tackle the climate emergency. Opponents have raised concerns that such a move would result in the ultra-wealthy leaving the country.

However, experts say there is no evidence of a mass millionaire exodus from the UK, with the overall number of millionaires and billionaires having risen steadily over the past two decades.

At the same time, the government has little idea of how many billionaires pay tax.
■

Extinction Rebellion protesters 'die' during demonstration at bank



XR protesters 'die' during a demonstration at Barclays in Oxford *(Image: XR Oxford)*



Scientists for XR occupy the Bank of England

July 23, 2025 by Extinction Rebellion

Press contacts: Shana 07546 166787 | XR UK press team press@extinctionrebellion.uk

Photos: https://drive.proton.me/urls/WFVCDS5XJR#OEow1XVNSOdf

Early on Wednesday 23rd of July, five scientists occupied the lobby of the Prudential Regulation Authority (PRA), part of the Bank of England.

Five scientists remained in the PRA's lobby from 8am until 9am, during the morning arrival of employees, demanding capital requirements on fossil fuels in the insurance and banking sectors. Three more offered flyers to staff inviting them

to an international network of financial regulators working for an end to fossil fuels expansion projects. [Signal link]

This protest took place during the second to last week of the PRA's public consultation on climate risk in insurance and banking, entitled 'Enhancing banks' and insurers' approaches to managing climate-related risks' [1]. The protestors argued that the PRA should be doing more to regulate these industries in a way that mitigates climate-related risks, by introducing capital requirements that would discourage providing financial and insurance support to the fossil fuel industry that is leading us ever deeper into climate catastrophe.

Capital requirements are the amount of liquid capital that must be held by a firm, reflective of the risk of their assets, in order to help protect the economy from collapse. Capital requirements on fossil fuels would deem these assets riskier and increase the manditory amount to be held, thereby discouraging the holding of these assets.

The scientists taking part insist that climate and ecological breakdown must be central to discussions around mitigating economic breakdown – allowing insurance and banking sectors to continue to insure and loan to fossil fuel companies does not follow scientific consensus or economic logic. Signs were held with calls to action, "Climate tipping points = economic risk. Stop new fossil fuels, capital requirements now" and "Ecosystem collapse is financial collapse, capital requirements for fossil fuels now".

Signs also quoted Günther Thallinger, Allianz SE board chairman from his March 2025 article 'Climate, Risk, Insurance: The Future of Capitalism' [2] stating "This is about saving the conditions under which markets, finance, and civilization itself can continue to operate. [...] There is only one path forward [...] burning less carbon or capturing it at the point of combustion."

"*Those that work in insurance and at the PRA, like us scientists, know how dire the situation is,*" said Shana, Space Engineer and occupier of the lobby. "*To talk about 'managing climate-risk' in regard to banking and insurance operations whilst ignoring the fact that these same firms are enabling new oil and gas projects is baffling. They're advising companies on how to manage a crisis that these same companies are actively contributing to – it's like giving fire safety training to the person lighting the flames. Instead of just managing risk we need to actively be mitigating risk – something the PRA can do through capital requirements on fossil fuels for banks and insurers.*"

The PRA, in its latest paper on climate risks in the financial sector, admits that most banks and insurance companies are not properly analysing their climate related risks, and the industry requires work at a governance level to better understand climate risks including climate scenario analysis (eg. unprecedented, non linearity, tipping points) to

fully capture future risks [1]. A recent article in the Financial Times quotes senior Bank of England staff who resigned over the deprioritization of climate and nature risks [3].

Capital requirements on fossil fuels is not as radical an idea as it may seem – the European Insurance Authority (EIOPA) recommendeds capital requirements on fossil fuels "to accurately reflect the high risks of these assets" [4] and capital requirements are mentioned in the PRA consultation paper's current iteration. However the PRA still states that no new capital requirements will be imposed on top of what is required now. This results in little financial incentive for banking and insurance firms to reduce their involvement in new oil and gas expansion projects, missing a vital opportunity to incentivise meaningful change in our financial sector.

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Ten Greenpeace activists arrested after suspending themselves from bridge outside Edinburgh

The protesters dangled themselves 25m above the water line, stopping a tanker from delivering gas for 24 hours.

Saturday 26 July 2025 12:38, UK



Protesters suspended themselves from the Forth Road Bridge. Pic: Greenpeace

Ten Greenpeace activists have been arrested after suspending themselves from a bridge over a river to halt a tanker carrying fracked gas.

The Forth Road Bridge outside Edinburgh was closed on Friday due to the demonstration, with Police Scotland alerted shortly after 1pm.

The protesters ended up dangling around 25m above the water level at high tide.



The group said its activists had prevented the tanker from delivering gas. Pic: Greenpeace

Greenpeace announced it had ended the demonstration on Saturday morning, saying it had "achieved what we set out to do".

The group said its activists had prevented the Ineos tanker from delivering the gas for a full 24 hours, because the vessel could only travel to the Ineos petrochemical plant at nearby Grangemouth during high tides.

Its specially trained activists began climbing down their ropes on Saturday morning.

Greenpeace said all 10 descended safely and were voluntarily transported to Port Edgar in South Queensferry, where it said they were arrested by officers from Police Scotland on suspicion of culpable and reckless conduct.

Police Scotland confirmed five men aged between 35 and 40, as well as five women aged between 25 and 42, had been arrested.

It said further inquiries were ongoing and the Forth Road Bridge remained closed to traffic as of Saturday morning.

Read more:
25% of young children now malnourished in Gaza, charity says
Trump issues warning to leaders as he arrives in Scotland

Amy Cameron, programme director at Greenpeace UK, said: "By blocking Ineos, we've drawn global attention to the company's bottomless appetite for plastic production, false solutions and profit for its billionaire boss Jim Ratcliffe."

Describing the "plastic pollution problem" as "massive", she added: "Less than 10% of plastic is currently recycled globally, and this is set to rise to just 17% by 2060, while the amount of plastic we're producing is set to triple.

"The only solution is to address the problem at source which means securing a strong global plastics treaty that imposes legally-binding caps on plastic production."

Greenpeace insists its protest was safe and caused "minimal disruption".

It stressed the climbers had spent weeks training for the demonstration and pointed out the Forth Road Bridge carries low volumes of bus, cycle and pedestrian traffic.

Bank of England 'heist' as ministers face fresh anti-Rosebank oil field protests



Protesters outside the Bank of England. Photo: Fossil Free London

MINISTERS have faced a fresh protest against their possible renewal of permission for the Rosebank oil field, after the original decision was found to be unlawful in a landmark Supreme Court ruling last year.

Fossil Free London activists dressed as robbers emblazoned with the Norwegian flag staged a "heist" at the Bank of England on Monday evening to highlight the "daylight robbery" that approval of of the application for exploitation of the oil field would entail.

Rosebank is the largest undeveloped oil field in the North Sea. If its development goes ahead, this would lead to the release of carbon emissions equal to those produced by all of the world's 28 low-income countries, the activists said.

Chanting "Rosebank Oil is a scam. Labour, do you give a damn?" the campaigners carried sacks labelled "UK taxpayer money" filled with fake cash from a makeshift vault and held placards reading "£1.5 billion for Norway, net loss for UK."

Fossil Free London director Robin Wells said: "It's plain and simple, Rosebank is daylight robbery.

“If allowed, Equinor, a Norwegian oil giant, will rob us blind, hoarding massive profits for themselves and leaving behind nothing but a trail of climate chaos and a net loss for us.

“The UK government needs to stop this carbon bomb and act in the interests of the general public — scrap Rosebank and invest in a just transition.”

In January, the Court of Session in Edinburgh found that a Supreme Court ruling that planning authorities should consider the full climate impact of burning oil from new wells should apply retrospectively to the former Tory government’s decision to approve the Rosebank and Jackdaw oil and gas fields.

The environmental assessments for these projects did not count the greenhouse gases that would be released when the fossil fuels produced by them were eventually burned.

The January ruling said that work on both fields could continue while the new information was gathered, but no oil and gas could be extracted unless fresh approval was granted.

Ministers later confirmed that they would consider the significance of a project’s environmental impact, “while taking into account and balancing relevant factors on a case-by-case basis, such as the potential economic impact and other implications of the project.”

No decisions are expected until the autumn.

The Department for Energy Security and Net Zero was contacted for comment.

Morning Star for Peace and Socialism

Direct Action / 18 August 2025

Activists cut utilities to world's biggest fossil fuel investors declaring 'Summer of Sabotage'



Shut the System activists cut the electricity to Barclays' Barclaycard's Northampton headquarters, August 18, 2025

ACTIVISTS sabotaged utilities infrastructure at the offices of major fossil fuel investors today, declaring the start of “disruption like never before” against fossil fuel finance.

Shut The System cut cables and superglued electrical service cabinets at JPMorganChase and Allianz in London, demanding they stop financing the climate emergency and genocide in Gaza.

At Barclaycard’s Northampton headquarters, activists cut the 5G communications mast serving the building.

The underground climate campaign said the action marked the launch of a period of sustained sabotage against financial institutions deemed “key culprits” in the climate crisis, running until the end of September.

It urged civilians to join a “Summer of Sabotage” by destroying the property and operating systems of institutions providing “critical support to deadly industries globally.”

JPMorgan is the world’s largest fossil fuel investor, while Barclays is the biggest in Europe, according to a June report by Reclaim Finance.

And Allianz is the sixth-largest fossil fuel insurer and insures Elbit Systems, an Israeli arms firm supplying the majority of weapons used in Gaza.

A Shut The System statement said: “We have been forced underground by draconian anti-protest laws.

“The British state has recently shown how much they are willing to suppress peaceful protest.

“History shows direct action and sabotage are highly effective so we cannot stop while the climate emergency wages on and we see the most hopeful path forward is to operate beyond the state’s reach.”

The group has pledged to escalate its actions in October if demands are ignored.

Earlier this year, it cut fibre optic cables at insurance firms in Leeds and Birmingham, disrupted internet access, and carried out nationwide graffiti

actions at Barclays branches during its annual general meeting.

JPMorgan, Allianz and Barclays were approached for comment.

Extinction Rebellion 'unearth the truth' at Welwyn Garden City protest

The Welwyn & Hatfield Times

26 Aug 2025 13:00

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Author: Huw Richards
Print Edition: Welwyn Hatfield Times
Length: 391 words

Body

Extinction Rebellion claim to have "unearthed the truth" about a Welwyn Garden City insurance broker during a demonstration.

On Saturday, August 23, members of Hertfordshire Extinction Rebellion groups, dressed as oil workers and insurance executives, protested outside Howden Insurance in the town centre.

Extinction Rebellion members protest outside Howden, Welwyn Garden City. (Image: Derek Langley)

-The group called the protest due to its belief that Howden "supports the fossil fuel industry".

At the action on Saturday, an oil rig was set up outside the Howden branch, and members of the group dressed as oil workers allegedly "engaged" with Howden-s senior executives.

Phil from North Herts Extinction Rebellion said: "I hope people found our actions today both eye-opening and entertaining. Although there is widespread concern about the climate crisis among the public, the influence of the insurance companies on averting disaster may not be so well known.

"If a new oil or gas project can-t get insurance they simply can-t operate, so the insurance companies are in a uniquely powerful position.

"But companies like Howden are still actively supporting these industries, while at the same time home insurance premiums are doubling or even tripling to pay for the increased risks from extreme weather events like flooding and heatwaves. This is good business for them and a disaster for the rest of us."

(Image: Derek Langley)He added: "Many of us use Howden to insure our homes, cars, and even our pets. But they are secretly making millions by also acting as brokers for new oil, gas, and coal projects - despite dire warnings from scientists.

"We were asking Howden to do the right thing: pull the plug on insuring any new fossil fuel projects - this would send a powerful signal to the industry."

The demonstration was part of Extinction Rebellion's --Insure Our Survival" campaign, urges insurance companies to withdraw from insuring new fossil fuel operations which are believed to be worsening the climate crisis.

Insurance offices up and down the country have been targeted in a wave of nationwide actions, with activists demanding that key insurers stop backing destructive new fossil fuel projects and end their complicity in climate disaster and human rights abuses.

When contacted, Howden did not wish to comment.

(Image: Derek Langley)

Classification

Industry:
Insurance (92%), Insurance Overview (92%), Fossil Fuels (89%), Insurance Agencies & Brokerages (89%), Energy & Utilities (89%), Homeowners Insurance (78%), Property & Casualty Insurance (78%), Natural Gas Extraction (75%), Insurance Premiums (73%), Coal Industry (50%)

Subject:
Protests & Demonstrations (91%), Negative News (90%), Environmental Activism (90%), Negative Misc News (90%), Fossils (89%), Negative Environmental News (89%), Climate Change (89%), Severe Weather (88%), Environmental Accidents & Disasters (79%), Activism (78%), Negative Personal News (78%), Executives (77%), Floods & Flooding (73%), Heat Waves (68%), Weather (68%), Extreme Temperatures (68%), Human Rights Violations (63%), Human Rights (60%)

Climate protesters removed from Reform conference after heckling Nigel Farage

The protesters from Climate Resistance targeted the Reform leader to accuse him of working for super-rich donors.



A protester is removed from an address by Reform UK leader Nigel Farage during the party's annual conference (Jacob King/PA) (PA Wire)

Three climate protesters were carried out of the Reform UK party conference after shouting at Nigel Farage while he was on stage.

The protesters from Climate Resistance, a group calling for the government to tax the super-rich to fund public services and climate action, had planned to interrupt the Reform UK leader and Clacton MP during his keynote speech.

But he delivered it several hours earlier than originally planned after Angela Rayner resigned from the government.

They staged their protest as Mr Farage returned later to appear with special guest Preston Manning, the founder of Canada's now-defunct Reform party.

Climate Resistance targeted Mr Farage to accuse him of working for super-rich donors, such as property tycoon Nick Candy.

“You work for billionaires!” one shouted at Mr Farage.

Another said he was “paid by the super-rich to scapegoat migrants”.

Mr Farage paused to say: “Off you go, mate…boring!”

One shouted “f*** the fascists” and “tax the rich” as security guards carried her out.

The audience chanted “out out out” and booed her.

Sam Simons, spokesperson for Climate Resistance, said: “Farage will go on national TV and say how he cares about the people in the UK, and then vote to keep us from getting our sick pay.

“This grifter will scapegoat anyone just so we don’t talk about the oil barons and billionaire property tycoons who fund him.

“It’s really about keeping everyone so divided and downtrodden that we won’t even have time to think about taxing the super-rich.”

Mr Simons added: “Meanwhile, the super-rich are fanning the flames of climate collapse with their lavish lifestyles, and exploiting people and the planet for profit.

“The top 10% in the UK hold more wealth than all the rest of us combined, and pollute far more than ordinary people.

“The majority of Britain wants a wealth tax. It’s time to tax the super-rich and finally do what Reform never would: fund our schools, our hospitals, our climate and our futures.”
■

Campaigners around the country fight to stop Rosebank



CAMPAIGNERS to stop Rosebank took to the streets across the country on Saturday, protesting outside the offices of oil giants and in Prime Minister Sir Keir Starmer's backyard.

In Aberdeen, environmentalists joined forces with Scottish Palestine Solidarity Campaign (SPSC), protesting at the offices of Equinor and Ithaca to call for a ban on the development of the 300-million barrel field.

Speaking from the protest — one of almost 20 which took place around the country — Aberdeen SPSC activist, Kate Ramsden told the Star: "Rosebank isn't just an environmental disaster, Ithaca's involvement would generate hundreds of millions for Delek who are already literally fuelling the genocide in Gaza.

"Starmer needs to locate his conscience and stop Rosebank."

Four hundred miles away, campaign groups including Mothers Rise Up took that same message to the heart of Sir Keir's Holburn and St Pancras constituency.

Mothers Rise Up's Lorna Powell said: "Approving new fossil fuel projects like Rosebank in the context of an escalating, deadly climate crisis is simply unjustifiable."

The Department for Energy Security and Net Zero said its priority was to “deliver a fair, orderly and prosperous transition,” but could not comment on individual licences.

■

Two insurers named as targets in next Extinction Rebellion climate protest offensive

Two insurers are in the sights of Extinction Rebellion's next coordinated climate protest campaign

Insurers operating in the UK have been warned to expect a fresh wave of coordinated climate protests in September.

Activist group Extinction Rebellion (XR) has confirmed plans to target companies it says are enabling fossil fuel projects and arms trading.



Its campaign – dubbed *Insure Our Survival* – is set to run from 8 to 22 September 2025, with large-scale demonstrations confirmed for London on 8 and 9 September and further actions planned nationwide.

XR said the campaign would include coordinated actions in Europe, the Americas, Africa and Asia, with groups in the Global North working alongside those in the Global South to "amplify frontline voices" opposing fossil fuel and arms financing.

Targeted insurers

XR said the campaign will focus on international firms Axa and AIG, saying the call for action is an effort to draw attention to the broader insurance sector's role in underwriting high-carbon and defence projects.

The group claims fossil fuel and arms insurance represent just 2% to 3% of targeted firms' portfolios, arguing they could be removed without material financial harm.

Insurers have faced increasing scrutiny from climate campaigners in recent years, with several large players adopting restrictions on coal, oil and gas underwriting in response to public and shareholder pressure. However, XR maintains that such commitments remain inadequate to meet climate goals.

The September actions will form part of XR's ongoing global pressure campaign, which the group says will continue until targeted insurers commit to stopping fossil fuel and arms underwriting.

■

Protesters project ‘toxic’ images onto insurers’ City offices

‘Axa and AIG present themselves as protecting homes and families, yet continue to underwrite projects that accelerate climate breakdown and fuel conflict,’ says spokesperson

Activists staged protests at the City of London offices of Axa and AIG yesterday (8 September 2025), blocking access to the buildings and calling on insurers to stop underwriting fossil fuel and defence-related risks.



The demonstration formed part of a two-week wave of coordinated global actions led by campaign group Insure Our Survival, which is planning protests across more than 30 cities worldwide between 8 and 22 September. Demonstrations are also scheduled in London for today.

According to organisers, the London blockade began around 8am outside Axa’s offices, with campaigners dressed in suits and gas masks carrying placards urging a boycott of Axa and AIG. Activists also threw fake blood-stained £50 notes and projected images onto buildings as part of the action.

The campaigners accused both insurers of profiting from fossil fuel expansion and from companies linked to armed conflict. They argued that such underwriting activities account

for less than 2% of global insurance profits, suggesting that insurers could exit the sectors without significant financial impact.

Lucy Porter, UK spokesperson for Insure Our Survival, said: "Axa and AIG present themselves as protecting homes and families, yet continue to underwrite projects that accelerate climate breakdown and fuel conflict."

Carbon boycott

Yesterday's London action followed a weekend of projection protests at Axa and AIG offices in London, Paris, Cologne, Johannesburg, Manchester, Glasgow, Auckland and Ipswich. Images of senior executives wearing gas masks were projected onto buildings, which campaigners said symbolised insurers' exposure to "toxic" industries.

Research cited by organisers alleged that Axa holds investments in fossil fuel firms linked to so-called "carbon bomb" projects, including coal, oil sands and shale operations. At the same time, AIG has been identified as one of the world's largest coal insurers with more than $24bn (£17.73bn) invested in fossil fuel-related assets as of 2022.

Extinction Rebellion (XR) previously occupied AIG's office in London on October 30, 2024.

Speakers from climate and political groups, including Palestine-focused organisations, also scheduled addressed the demonstration throughout the day.

Insure Our Survival said it is also encouraging consumers and businesses to boycott other large insurers, including Allianz and Aviva.

Extinction Rebellion (XR) previously protested at the Premiership rugby final on June 14, 2025, to demand that the Rugby Football Union (RFU) end its sponsorship deal with Allianz.

■

Extinction Rebellion protesters stage ‘die in’ at Barclays Bank in Reading



Protesters from Extinction Rebellion performed a ‘die-in’ at Barclays Bank in Reading to link fossil fuel funding to climate change and global deaths.

Extinction Rebellion says: “Around the world, millions of people are dying as a result of heatwaves, wildfires, torrential rain, drought, flooding and landslides, all caused by changes in our climate brought about by the constant increase in greenhouse gas emissions.

“Barclays Bank is still funding fossil fuel projects which contribute to climate change, thus indirectly contributing to the deaths of humans and wildlife.

“Analyses from the World Weather Attribution organisation show that extreme weather is becoming more likely due to climate change.

“Heatwaves are the deadliest type of extreme weather globally, contributing to at least 500,00 deaths a year, including some in the UK. Researchers from the London School of Hygiene & Tropical Medicine (LSHTM) and Imperial College London, estimate that high heat killed 2,300 people across 12 major cities as temperatures soared across Europe this summer. They attributed 1,500 of the deaths to climate breakdown, which is heating the planet and making the worst extremes even hotter.”

Dr Ben Clarke, researcher at the Centre for Environmental Policy at Imperial College London, said: “Heatwaves don’t leave a trail of destruction like wildfires or storms. Their impacts are mostly invisible but quietly devastating – a change of just 2 or 3C can mean the difference between life and death for thousands of people.’ He warned that countries need to speed up the transition from fossil fuels to renewable energy.

Greece, Turkey and Cyprus suffered devastating wildfires. Greece experienced a heatwave above 45C, drought and strong winds. At least 17 lives were lost, including 10 firefighters and rescue workers.

An intense two-week heatwave in Norway, Finland and Sweden was hotter, with temperatures of 30C and more, resulting in many more hospital admissions.

A new study, published in the medical journal JAMA, links more than 400 additional deaths to the wildfires in Los Angeles earlier this year. The study comes as hundreds of wildfires burn across the US and Canada.

Climate change not only increases the risk of wildfires around the world but also makes them particularly explosive. Relatively small blazes rapidly “blow up” so suddenly and with such ferocity that they become difficult to control.

Climate change also intensified heavy monsoon rain in Pakistan, which suffered its worst floods on record, killing hundreds of people.

In late June 2025, several days of heavy rainfall swept across Colombia and Venezuela, causing widespread flooding, overflowing rivers, and numerous landslides, one of which killed 27 people.

Moscow suffered its worst flooding since 1879, with some parts experiencing far more than the monthly average.

These extreme weather events will only continue to become worse if governments do not do more to reduce emissions from greenhouse gases such as carbon dioxide and methane·

Extinction Rebellion will pose as dead bodies (a 'die-in') to remind people of how they say that Barclays continues to fund projects that are contributing to over-heating planet Earth. Extinction Rebellion also says that they also hope to encourage visitors to the branch to move their accounts from Barclays to other banks with much 'greener' credentials.



■

Extinction Rebellion protestors spotted in Ipswich

Ipswich Star

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Author: Paris Maben-Hume
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Length: 271 words

Body

Extinction Rebellion protestors were seen outside a block of offices in Ipswich.

Local activists for the environmental movement in the Suffolk town and nearby Colchester are taking part in a coordinated global campaign targeting insurance giants AXA and AIG.

The campaign started on September 8 and will run until September 22.

It is calling for a boycott of the insurance giants and their sub-brand and is urging people to switch providers.

READ MORE: School pledges 'rapid' change after being issued with government warning

The protestors held up banners outside the entrance to the office block(Image: Newsquest)

On Monday morning, Extinction Rebellion Ipswich was protesting outside the AXA building at Brooke Lawrence House in Civic Drive.

The group held up banners which read: "We are all vulnerable. Stop insuring fossil fuels."

Blue and white tape saying "climate crime scene" was put up on the entrance steps to the office block.

They also handed out flyers to passers-by and AXA staff.

READ MORE: Hundreds of staff at housing association have data leaked in payroll breach

Tina, from Extinction Rebellion Ipswich, said: "Ipswich is on a tidal river, so people are already living with the risk of flooding, and this will only get worse as the climate gets hotter.

"New homes have just been built along the riverside. How long will it be before these become uninsurable?

"Knowing that AXA is not only profiting from these crises but exacerbating them while claiming to protect us is outrageous.

"As we have a large AXA office here in Ipswich, I thought it was important to join this global campaign to highlight this issue locally."

Classification

Industry:
Insurance (90%), Insurance Overview (90%), Energy & Utilities (73%), Data Breaches (66%), Fossil Fuels (54%)

Subject:
Negative Misc News (93%), Environmental Activism (92%), Protests & Demonstrations (91%), Negative News (90%), Activism (90%), Community Activism (90%), Environmentalism (78%), Environment & Natural Resources (78%), Negative Personal News (78%), Government & Public Administration (71%), Negative Technology News (68%), Rivers (66%), Data Breaches (66%), Crime, Law Enforcement & Corrections (53%)

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Wash It Off: Private jet sprayers found guilty



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 today. They took action with Just Stop Oil to demand the UK government negotiate a treaty to phase out oil and gas by 2030. [1]

Jennifer Kowalski, 29, from Dumbarton, and Cole Macdonald, 23, from Brighton, had cut through the wire perimeter fence and sprayed paint from a fire extinguisher onto two private jets parked at Stansted Airport, just hours after Taylor Swift's plane had landed. [2]

After the 4 day trial the jury returned a unanimous verdict of guilty. Sentencing will be on the 27th of October.

During the trial, the prosecution argued that extensive professional cleaning was required for the two planes after the action. The total cost of cleaning was assessed to be around £12,000.

The defendants told the jury they did not set out to cause damage. They explained that they had deliberately avoided spraying the engines and cockpits and believed the diluted

paint would wash off easily. They argued that they lacked the necessary criminal intent: they neither intended to cause damage nor realised that damage was a likely consequence of their actions.

In her defence Jennifer Kowalski explained that the action had been designed to target Taylor Swift's plane because of her personal interest in the famous singer and the immense influence that she carries. She said:

"She's one of the most famous people in the world; she's talked about everywhere, she's the only singer ever to be named Time Magazine Person of the Year; she earned 2 billion dollars last year; reporters devote their lives to covering her; if we devoted that much energy to tackling climate change we could change things.

"I thought a lot about what she might say – if we could get her attention – if she saw this it might get a reaction from her, from a place of care from a fan, instead of from a place of apathy – she's famous for saying how much she loves her fans, and yet her fans are dying because of climate change."

At trial, Judge Mill ruled that the damage was too serious for the rights to free expression and assembly under Articles 10 and 11 of the European Convention on Human Rights to apply. As a result, the jury was not asked to consider whether a restriction on the defendants rights to protest was proportionate response in the light of the alleged damage, and that defence was blocked from the trial.

Following the verdict Cole MacDonald said:

"We were released from remand the day before the general election that elected a left wing government and that under that government the country has slipped into fascism and has become continually more corrupt."

Jennifer Kowalski said:

"I broke into Stansted airport to spray paint Taylor Swift's private jet because this is a dangerous time – the era of global boiling. This era will not end when it's time for a new album – it's the era to end all others.

"*When I look out people's windows, I see entire settlements swept off the map and thousands killed by climate disasters. On this reckless path 1 billion people will be displaced by 2050. When you strip people of their basic rights and cram them into perilous conditions violence inevitably ensues.*

"But it's not too late to be brand new. I just think you are what you love. And I'll fight for the music and people I love. Won't you?"

While two young people face an uncertain penalty for taking action targeting private jet use, it is estimated that 80% of the world's population has never taken a flight. Just 1% of people cause 50% of global aviation emissions and private jet users are responsible for up to 14 times as much carbon emissions compared with a commercial flight. A single flight in a private jet can easily emit as much carbon dioxide as the average annual carbon footprint for an EU citizen – 8.2 tonnes. Private aviation contributed at least 15.6 Mt CO_2 in direct emissions in 2023, or about 3.6 t CO_2 per flight. Almost half of all flights (47.4%) are

shorter than 500 km. Private aviation is concentrated in the USA, where 68.7% of the aircraft are registered. [3] [4] [5][6]

Morning Star for Peace and Socialism

Scotland / 22 September 2025

Insurance giant accused of 'keeping killers safe' at Glasgow protest



Protesters outside AXA offices. Photo: Extinction Rebellion Scotland

Stop Rosebank



Any day now, the UK government will face a major climate test. Equinor is expected to reapply to develop Rosebank: the biggest undeveloped oil field in the UK.

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Activists disrupt BP panel over hurricane-fuelling profits



[Pic: Fossil Free London]

ACTIVISTS have disrupted a panel event featuring senior BP executive Stewart Macfarlane, as the oil giant announced quarterly profits of $2.2 billion (£1.7bn), surpassing analysts' forecasts.

Campaigners from Fossil Free London interrupted the discussion on Tuesday evening, chanting: "As Hurricane Melissa tears down lives, do your profits help you sleep at night?" before being escorted out of the event hosted by the Association of International Energy Negotiators at Simmons & Simmons LLP's London office.

The protest came just days after Hurricane Melissa devastated Jamaica, with scientists warning that the climate crisis intensified the storm's impact.

BP has faced mounting criticism after scaling back its climate commitments.

Earlier this year, the company increased its annual investment in oil and gas to $10bn (£8.2bn) while cutting more than $5bn (£4.1bn) from its low-carbon spending plans.

A Global Witness analysis found that the rollback could cause around 72,000 additional heat-related deaths worldwide by the end of the century.

Fossil Free London director Robin Wells said the BP profits show that the company's "green mask has slipped to reveal the oily mouth behind," accusing the firm of fuelling global destruction while "CEOs and shareholders wine and dine in luxury."

■

Campaigners disrupt Oil Executive awards dinner in London

To highlight damage caused by the oil and gas industry, campaigners from Fossil Free London interrupted the World Energy Council Assembly's dinner at the Hilton in Mayfair on 3 December.

Oil and gas executives had gathered to present and receive industry "achievement awards". Award nominees and attendees included Shell, BP, and Ithaca Energy.

Campaigners chanted "no awards for climate criminals", as they were dragged out of the building by security.

The protest comes after devastating flooding has killed at least 1,250 people across much of southeast Asia in recent days. Human-caused climate breakdown has increased the intensity of such extreme weather events.

Oil damages

A report recently found that oil and gas giants are responsible for €25 trillion in climate damages. Now, survivors of Super Typhoon Odette in the Philippines are suing Shell for damages, in a legal first for holding big oil accountable for its role in climate destruction.

Robin Wells, Director of Fossil Free London said:

> *Whilst executives drink champagne in tuxedos, the world floods outside. They pat themselves on the back for the 'deal of the year', whilst their projects sign death warrants for communities in the Global South and future generations everywhere.*
>
> *How can it be that business as usual awards the fossil fuel corporations that depend on the systematic destruction of our life support systems? The science is clear: every new oil field is an act of violence. We crashed their party to remind them that history will not give them an award; it will put them on trial.*

Featured image via the Canary

■

Southern Daily Echo Follow 9.1K Followers

Arrest made as climate activists stage protest in Southampton

Story by Ross Marshall • 5mo • 1 min read



The protesters took to Threefiled Lane in Southampton (Image: NQ)

A woman has been arrested during a climate protest in Southampton today.

Campaign group, Cut The Ties To Fossil Fuels, have taken to Threefield Lane in Southampton to stage a demonstration today.

The group were seen holding signs and banners, reading 'cut ties to carbon pollution' and it is understood that police arrested one of the protesters at the scene.

Hampshire police have been approached for more information on the arrest.

A police spokesperson said: "We were called at 12:41pm today (Wednesday 10 December), to reports of a protest at a business on Threefield Lane in Southampton.

"Officers are in attendance.

"Policing these events requires us to balance the rights of those lawfully protesting, and the rights of others to go about their lives without being subject to unacceptable disruption, whilst keeping the public safe.

"Our priority with protests is always public safety."

Activists stage Extinction Rebellion protest against private jet expansion in London



Extinction Rebellion campaigners gather outside the Macquarie Group headquarters to protest the proposed expansion of Farnborough Airport. Two activists, dressed in airplane costumes, occupy the entrance canopy while unfurling a banner that calls for a ban on private jets and urges the investment firm to sever its connections to fossil fuels. The demonstration highlights the environmental impact of business aviation, as the Australian-based global financial services group faces criticism over its majority ownership of the airport and its plans to increase annual flight limits. (Photo by Joao Daniel Pereira/Sipa USA)

■

Cut ties to Big Oil to stop energy crisis sparked by Trump's war on Iran – protest footage

Outside the US Embassy in London on 1 April, two activists were tied by fuel hoses to a life-sized petrol pump in response to Donald Trump's war on Iran.

The protest criticised the increase in oil company profits in the wake of the war's destruction and trade disruption. The pump carried the label: "Oil Profit$$$ for Oil Bosses".

Campaigners from Fossil Free London held signs saying "Stop Trump Tying us Into Fossil Fuels", "Break Free from Climate Crisis" and "Break Free from Big Oil".

Thousands have died to date across the region following US and Israeli attacks on Iran. Trump has recently stated his intention to "take the oil in Iran" following major attacks on fossil fuel infrastructure.

Meanwhile, oil dependency is increasing the cost of living once again for families in the UK as petrol prices rise. Whilst fossil fuel companies stand to make a windfall of billions on the back of the price shock.

One of Reform's major donors, Jeremy Hoskings, has seen his fossil fuel and energy hedge fund investments rise by more than $25m since the war began in Iran.

This comes as Trump and Reform are using the oil price spike to call for our government to approve new UK oil and gas projects, like the controversial Rosebank oil field. Despite the fact that drilling in the North Sea would not make the UK more energy secure. If production began, Rosebank's oil would still go for export – like 80% of all UK oil.

Robin Wells, director of Fossil Free London said:

> *Right now we are seeing the horrors of Trump's war on Iran in the faces of dead schoolgirls and facing skyrocketing energy costs at home. And Big Oil cashes out big, with bumper profits.*

We're protesting today to say that for as long as the UK stays tied up in fossil fuels, we'll see more oil wars, more extreme weather deaths and more instability.

The UK needs to cut ties with Trump and Big Oil. We need to break free from this knot of violence.

That starts with scrapping new UK oil and gas and rejecting Rosebank. Until then, being tied into Big Oil's big disaster leaves us paying the price.

Featured image via Fossil Free London

■

FØSSIL FREE LONDON

PHOTOCALL: Body bags piled outside Equinor as Q1 profit spike expected from Iran war

When: 8.15am, Tuesday 5th May

Where: Equinor Offices, W2 6BD

Details: Activists from Fossil Free London will pile several life-sized body bags outside the offices of Rosebank co-owner Equinor, as one campaigner dressed as an oil executive stands on top of them.

The protest comes as the UK Government's decision on whether to approve or reject the Rosebank oil field approaches.

Equinor's quarterly profits are **also expected to jump** when announced on Wednesday 6th May, amidst the US-Iran war.

Photos can be used in coverage of Equinor's quarterly profit announcement.

(We will also stage a stunt ahead of Shell's Q1 profit results on Wednesday the 6th at 8:15 a.m. outside Shell's HQ, we will send a separate photocall tomorrow.)

For further information, to find us on the day, or to organise an interview please contact campaigner@fossilfreelondon.org, or 020 3886 2590.

Notes:

1. For further information, please contact Rosie, 020 3886 2590, **campaigner@fossilfreelondon.org**.

2. Fossil Free London is a grassroots climate group that protests Big Oil and campaigns for a London beyond fossil fuels. Instagram: **@fossilfreelondon** Twitter: **@fossilfreeldn**.

3. Photos from other Fossil Free London actions are available **here** and can be used in your journalism at any time without prior permission. Please credit Fossil Free London.

Protesters take aim at Aviva as shareholder meetings face disruption



The tie-up will create a significant force in the motor insurance sector (Alamy/PA)

Aviva's York offices were disrupted by protesters targeting the insurer's activities in the latest twist in a turbulent season for shareholder meetings.

It comes after NatWest's annual general meeting (AGM) was halted by activists accusing the bank of backtracking on climate commitments.

Campaign group Boycott Bloody Insurance claimed to be behind 12 people with shares in Aviva disrupting its AGM on Wednesday.

Several protesters shouting and chanting outside a boardroom were escorted or carried out of the building, delaying the start of the meeting.

The group claims Aviva underwrites or invests in companies profiting from immigration detention and surveillance, fossil fuel giants and weapons firms.

Andrew Taylor, a campaigner at Boycott Bloody Insurance said: "Aviva likes to present itself as an ethical business, but when you look at the companies it supports, that turns out to be a sham."

Aviva declined to comment on the protests.

Meanwhile, following a shareholder vote at the AGM, some 8.4% of votes were cast against the motion to approve Aviva's climate-related financial disclosures for 2025, while 5.5% of votes were against approving the pay policy for directors.

Aviva's chief executive Amanda Blanc took home a pay packet of £9.76 million last year.

The disruption comes a week after NatWest was forced to stop its AGM for about half-an-hour amid disruption during its chairman's opening speech.

Protesters were singing and making statements about NatWest's climate policies, while shareholder activists called on the banking group to address claims it had "reduced the ambition of its fossil fuel policy and climate targets".

Rick Haythornthwaite, NatWest's chairman, defended its policies and said the financing of oil and gas comprises 0.6% of the group's total lending.

Meanwhile, Barclays is expected to be targeted at its AGM in London on Thursday, with activist groups including the Palestine Solidarity Campaign and Campaign Against Arms Trade organising a protest outside the meeting.

■

Fossil Free London pours fake blood outside Shell offices as it ‘makes a killing’ from the Iran war



Fossil Free London campaigners protest outside Shell’s London headquarters against its giant profits from the Iran war [Pic: Fossil Free London]

FOSSIL Free London activists covered themselves in fake blood as they sat outside Shell’s London headquarters wrapped in a fuel pump today.

They erected a banner that read “BLOOD MONEY: No new oil & gas” amid expectations the fossil fuel giant will announce bumper quarterly profits today thanks to the Iran war.

Fossil Free London spokesperson Robin Wells said: “In these past few years, as our world becomes more unstable and the realities of climate breakdown set in, it’s never been clearer: Big Oil profits from, and locks in, mass death.

“And we’re feeling this so rawly right now. As we see thousands slaughtered in Iran and weep alongside those mothers who will never hold their children again, Shell is making a killing.”

More than 2,000 people have been killed by the US and Israel’s war in Iran, which has sent oil prices soaring due to a blockade on the Strait of Hormuz.

Barclays shareholder meeting targeted by Palestine and climate activists

Disruption broke out at the beginning of the shareholder meeting in Westminster on Thursday.



Protesters outside the Barclay's AGM in Westminster (Rebecca Speare-Cole/PA) (PA Wire)

Barclays faced a chaotic annual shareholder meeting as Palestine and climate activists repeatedly confronted the lender's board over its ties to Israel and fossil fuel financing.

The UK's biggest bank has come under fire in recent years for its links to Israeli government bonds and defence firms producing equipment used in attacks in the Gaza Strip, as well as companies driving large amounts of planet-heating emissions.

Disruption broke out at the beginning of the shareholder meeting in Westminster on Thursday, with groups of people being pulled out by security.

Chairman Nigel Higgins' opening remarks were repeatedly interrupted as protesters stood up holding Palestinian flags and shouting comments such as "Free, free Palestine" and "Everyone here is profiting from genocide".

Mr Higgins responded that the board had “heard your point” and would take questions on the topic during the meeting’s Q&A section.

A few minutes later, climate protesters rose from their seats and started singing: “Stop, in the name of love, before you break this Earth.”

One shouted: “This bank is financing the climate and nature crisis that we have to stop. Softly-softly, slowly-slowly is not good enough. You are endangering life on Earth.”

As the meeting moved to shareholder questions, the board was repeatedly quizzed about its recent fossil fuel financing.

Shareholders accused executives of failing to act with enough urgency over the climate crisis and criticised the board for leaving a key industry climate group, the Net Zero Banking Alliance.

A representative from ShareAction, which campaigns for responsible investment, called on the board to affirm that it will stick to its climate goals in light of its continued lending to oil and gas firms.

Mr Higgens said Barclays has “no intention of backtracking on its commitments” and remains on track to meet climate targets that it says are aligned with the UN Paris climate agreement to limit the worst impacts of global warming.

“I know this sometimes frustrates people who would like to see us move further, but we have got a big emphasis on consistency, not chopping, changing, going backwards, sideways,” he said.

On its oil and gas lending, Mr Higgins said the bank hit “quite demanding” targets for reducing financed emissions in the energy field and power sector early, although he also acknowledged that progress is “not going to be linear”.

In light of growing global energy demand and price shocks driven by the US-Israeli conflict with Iran, he said: “We feel we have to balance the planet with energy security, energy affordability and also ramping up our transition and sustainable financing activities.”

The board was also challenged about Barclays’ ties to the Israeli government after a UN report last year identified the bank as one of several firms implicated in profiting from a “genocidal economy” in Gaza.

Mr Higgins said the bank does not understand the “report”.

“We’ve read it and we don’t agree with the characterisation of the financial sector in it,” he said.

On its dealings with foreign governments, the chairman said the bank “tries to follow the policies set out by the British Government”, which continues to support Israel’s right to defend itself.

“These are deeply political and complicated questions and at one level, certainly, we take a steer from where our country’s Government is,” he said.

He added: “We do provide finance to a number of international defence companies who provide arms for the defence of this country, for the defence of Ukraine, and that is what the bank does.”

Asked if the bank will commit to supporting the sovereignty of the Palestinian people in any future dealings with Israel and its associated companies, Mr Higgins said: “The thing we all wish and pray for is peace in the region and reconciliation and an end to the appalling human cost on all sides of whichever frontiers you’re looking at.

“And all of the discussions around our policy, we shouldn’t lose sight of that fact – that is by far and away the most important thing to wish for.

“But I’m afraid I’m not going to go into our financing policies on specific clients.”

One shareholder shouted: “That’s not going to happen, Mr Chairman, unless commercial companies and banks stop financing Israel.”

City firms continue to face protests over their impact on people and planet, with NatWest’s AGM halted last week by activists accusing the bank of backtracking on climate commitments.

Wednesday also saw the London offices of insurance giant Aviva targeted by activists claiming the company underwrites or invests in companies profiting from immigration detention and surveillance, fossil fuel giants and weapons firms.

■

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS 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.

About us

Just Stop Oil was a nonviolent civil resistance group in the UK. In 2022 we started taking action to demand the UK Government stop licensing all new oil, gas and coal projects. We have won on this. **Civil resistance works.**

Just Stop Oil ended its street campaign in 2025, whilst we continue to support our action takers through the courts and in prison.



Two Just Stop Oil supporters found guilty for Heathrow paint spraying following retrial

Court & Prison, Press / May 14, 2026

Two Just Stop Oil Supporters who sprayed Heathrow departure boards with orange paint during the Oil Kills, international uprising to end fossil fuels in July 2024 have been found guilty in a retrial after the jury in an earlier trial failed to reach a majority decision. [1]

Phoebe Plummer and Jane Touil were appearing before Her Honour Judge Duncan at Isleworth Crown Court for the second time accused of criminal damage over £5,000 for their action on 30 July 2024 to demand a fossil fuel treaty to end oil and gas by 2030. [2] [3]

Following the verdict Jane Touil said:

"Since I took action, global fossil fuel use and emissions have continued to rise. More than ever, we need a global fossil fuel treaty to help governments rapidly phase out fossil fuels."

"What we do at this moment in history matters. But there is a difference between laws and morality. The courts apply the law made by powerful people. Morals come from within. It is our morals that give us our conscience. I have always tried to live according to my conscience."

Phoebe Plummer said:

"The climate crisis is the greatest injustice that humanity has ever faced. We should all consider what to do at this time. No individual caused this crisis and no one is solely responsible for stopping it. But we can choose what we do to alleviate suffering. I feel compelled to act to be a responsible citizen, a loving aunt and a good person. It compels me to hope for a better future and one where my nephew grows up. I didn't think the action would change government policy. But non violent civil resistance is a necessary part of tackling the climate crisis and I'm grateful and proud to have been part of that. "

Phoebe was remanded for 58 days and Jane for 14 days following the 2024 action in which the pair used fire extinguishers to spray diluted water-based paint in Terminal 5 including at the departure boards. The Crown alleged that the action caused £8,000 worth of damages and that three of the display screens needed to be replaced. [4]

At trial, Judge Duncan ruled out several legal defences for the action including those of 'reasonable excuse' under Articles 10 and 11 of the ECHR, 'necessity' and 'self defence' on the grounds that the threat from climate change was not proximate enough and the actions too far removed from the threat. The defendants were allowed to argue belief in consent : that they honestly believed the owners of Terminal 5 would have consented to the damage if they knew of its circumstances. However, evidence of the relevant circumstances was to be limited to the fact that it was a climate protest with all evidence about the scale and urgency of the climate crisis ruled *'irrelevant and therefore inadmissible'*.

In giving evidence, Jane Touil said:

"I genuinely and sincerely believed that if the shareholders [of Heathrow] had a full understanding of the situation we are in they would have given their consent to our action.

"Most people believe there is something that is wrong with climate but not many people have access to the full situation because the fossil fuel industry has used their immense wealth to ensure that governments do not act and it is not reported in the mainstream media.

"So I don't know if shareholders have a full understanding, but I know that if they did, they would be doing all in their power to stop fossil fuels because there will be no business as usual, no functioning society,

In her evidence Phoebe Plummer said:

"I want to make it very clear that this was not a protest against Heathrow, or anyone flying through Heathrow that day. It's true that the aviation industry is especially harmful to the climate in terms of emissions, though it is a small number of frequent fliers and private jet users who cause the vast majority of this harm, not families who save up for a holiday once a year.

"But this wasn't about getting people to stop flying…I made this individual change to live in line with my values, but honestly I know that it's pretty inconsequential. Even if we all woke up tomorrow and stopped flying and went vegan, it would be like mopping up a spill from an overflowing bath whilst leaving the tap on. All individual changes are like this when we are facing a systemic issue. If fossil fuels are extracted from the ground, then they will all be burnt, even if it's not on a flight that you're on. We need systemic change, that has always been Just Stop Oil's demand."

"My intention was not to cause damage. My intention was to take part in an act of nonviolent civil resistance, raising a serious alarm bell to the catastrophic future in store for us if we persist in our addiction to fossil fuels."

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.

ENDS

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW11

This is the exhibit marked "AJW11" in the witness statement of Alexander James Wright.

JUST STOP OIL

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!! NEW PROJECT ALERT !!

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



Take back POWER

Join us at: takebackpower.net

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

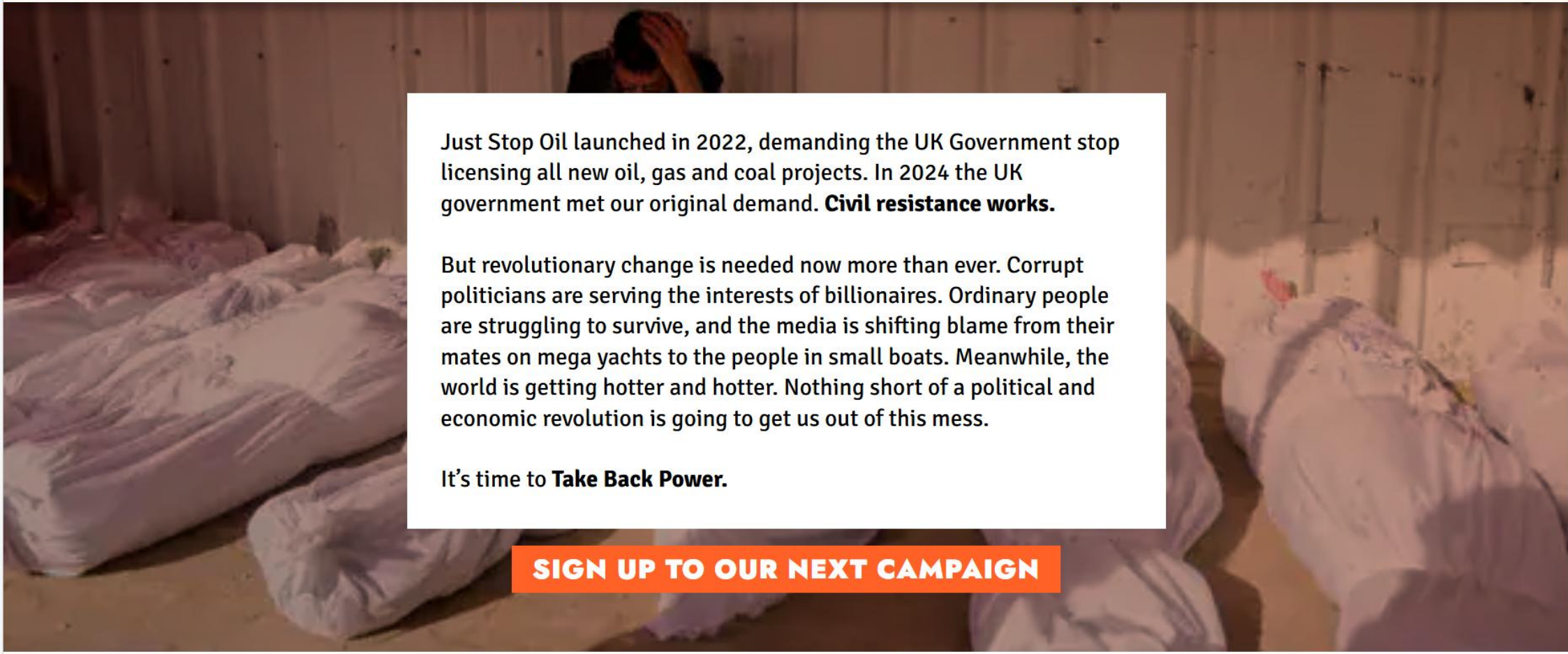
- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW12

This is the exhibit marked "AJW12" in the witness statement of Alexander James Wright.



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.**

SIGN UP TO OUR NEXT CAMPAIGN

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW13

This is the exhibit marked "AJW13" in the witness statement of Alexander James Wright.

just.stopoil and defendourjuries



973 92 47 48

just.stopoil 🚨 SLOW MARCHERS FOUND NOT GUILTY BY A JURY... more

17 April

17 April

just.stopoil



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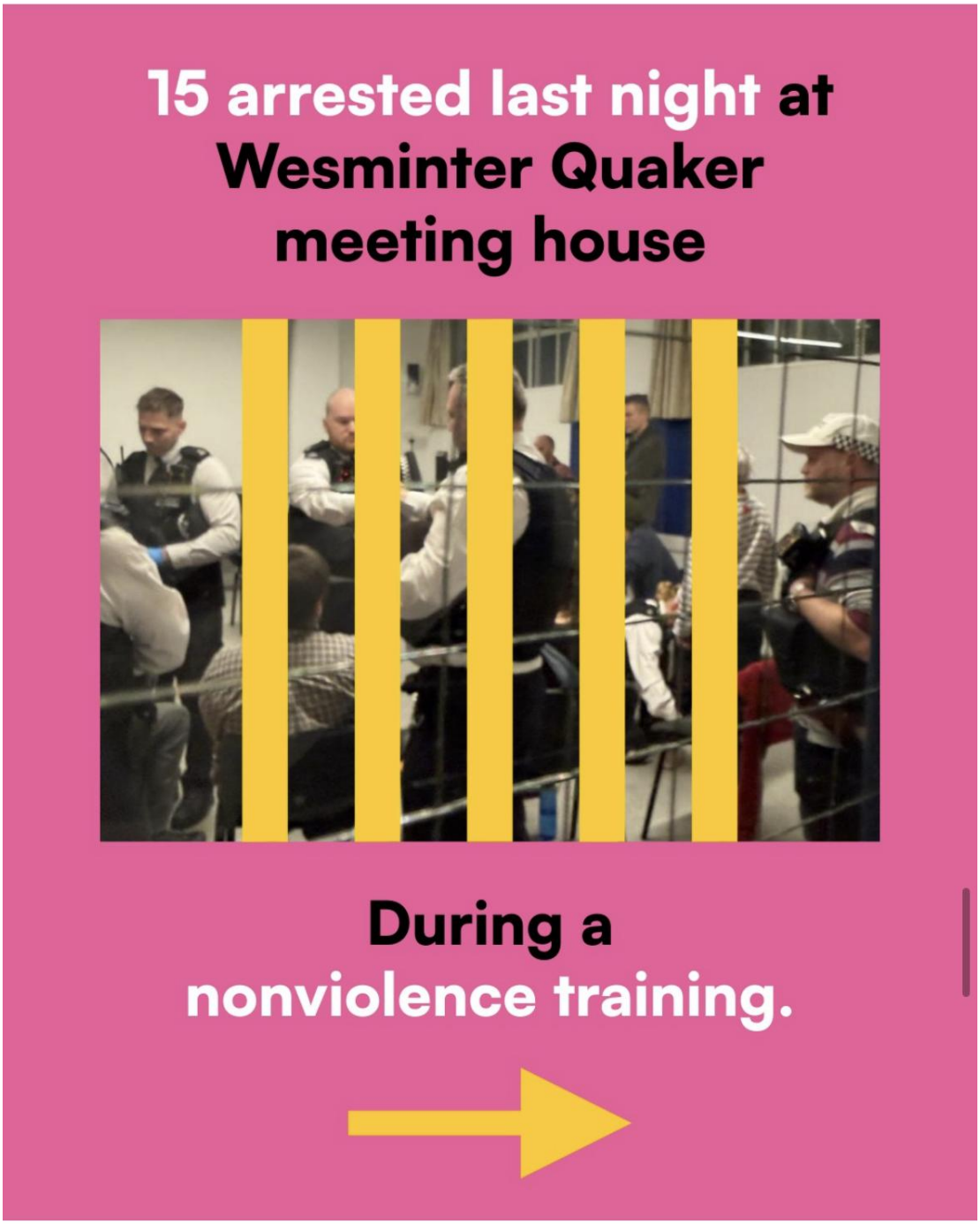
just.stopoil 🚨 BREAKING: JANE IS FREE!

Jane Touil, 60, has just been released from prison... more

7 April

takeback.power and 4 others



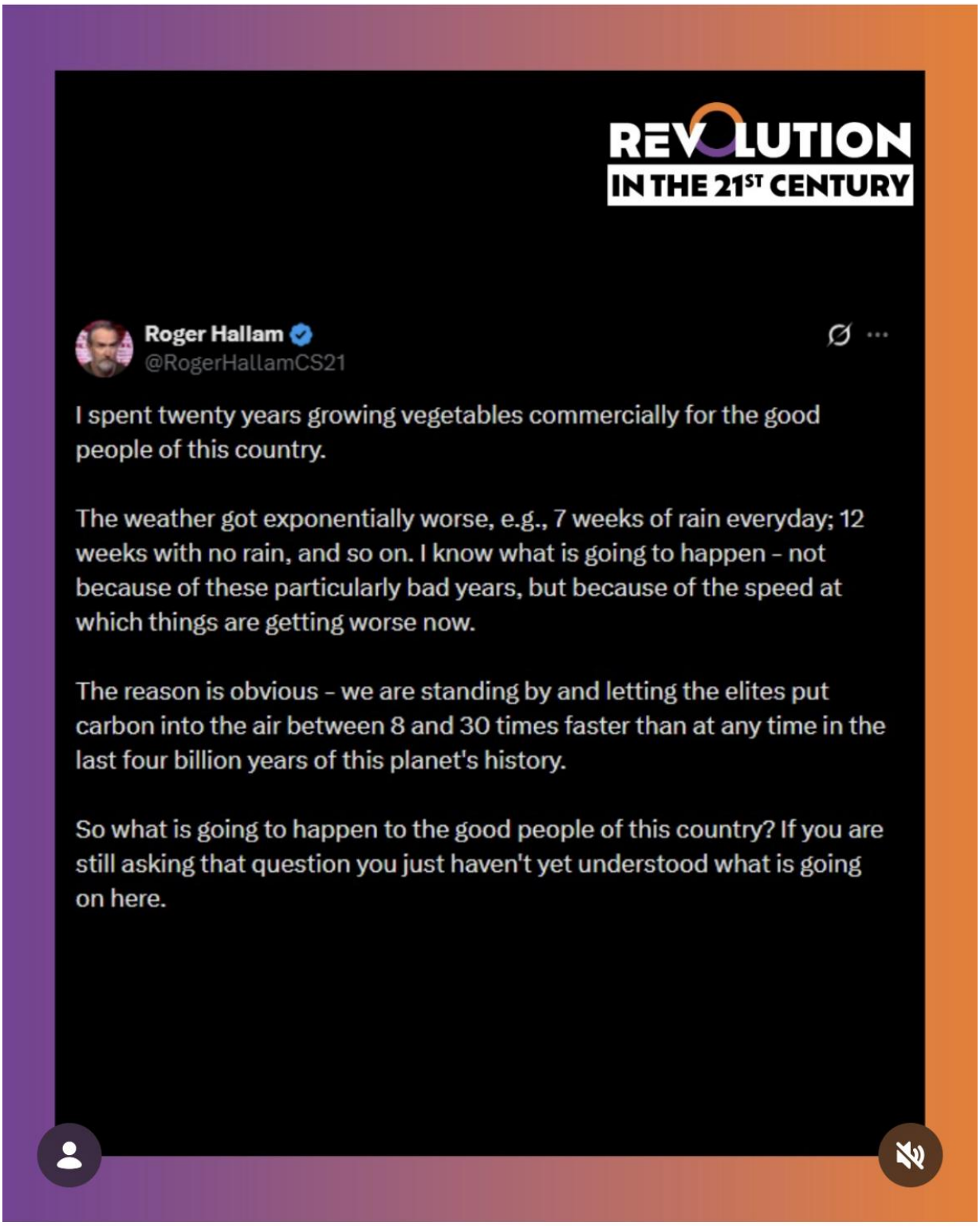
907 37 113 153

takeback.power Imagine being so deep in the pockets of CEOs and billionaires that you'd go to a Quaker Meeting House and arrest everyone at a nonviolence training.

@metpolice_uk really demonstrating the state's fear of peaceful resistance.

6 March

rogerhallamcs21 and 3 others
Wales, UK



298 18 28 31

rogerhallamcs21 With these numbers it's clear that revolution is inevitable. Sign up for it at rev21.earth.

3 March



69 3 2 3

takeback.power Another Just Stop Oil jury trial has just been adjourned to 2027.

Fact 1. All Section 7 jury trials bar one for nonviolent civil resistance have been adjourned in the 2 years since the Public Order Act came into law.

Fact 2. Lammy is planning to try and rush through scrapping jury trials.

There is no justice in our "Justice" Secretary.

23 February

Just Stop Oil
11.9K posts

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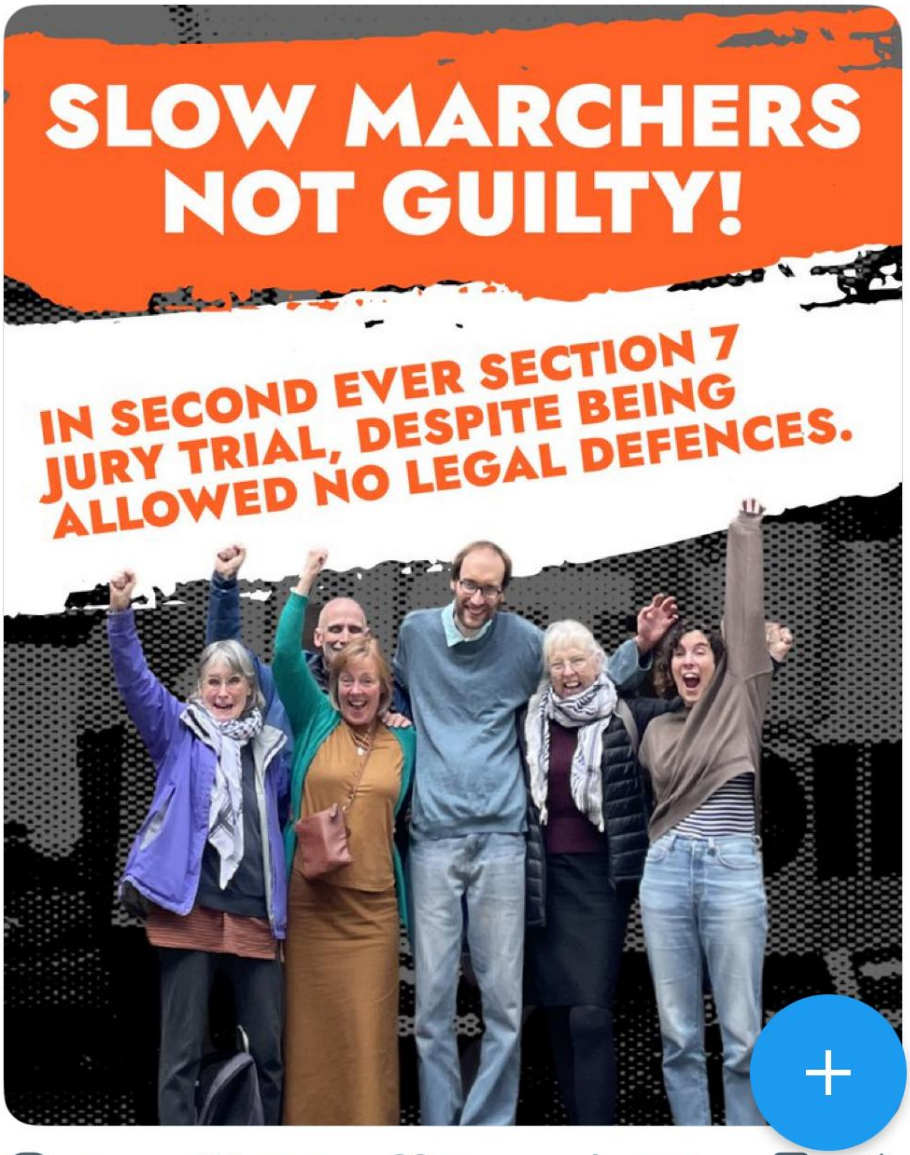
Posts Replies Highlights Videos Photos

Just Stop Oil @JustSt... · 17/04/2026

🚨 SLOW MARCHERS FOUND NOT GUILTY BY A JURY

Hey @SuellaBraverman, turns out juries don't like when you invent anti-protest laws designed to imprison people for 12 months just for marching.

Six Just Stop Oil supporters were a Show more



42 568 1K 35K

Just Stop Oil
11.9K posts

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Just Stop Oil @JustSt... · 07/04/2026

🚨 BREAKING: JANE IS FREE!

Jane Touil, 60, has just been released from prison after serving 4 months of a 20 month sentence for climbing a gantry over the M25 in 2022 to demand an end to new oil and gas. She is partially sighted.

She will serve the rest of her sente Show more



21 105 294 5.5K

Just Stop Oil
11.9K posts

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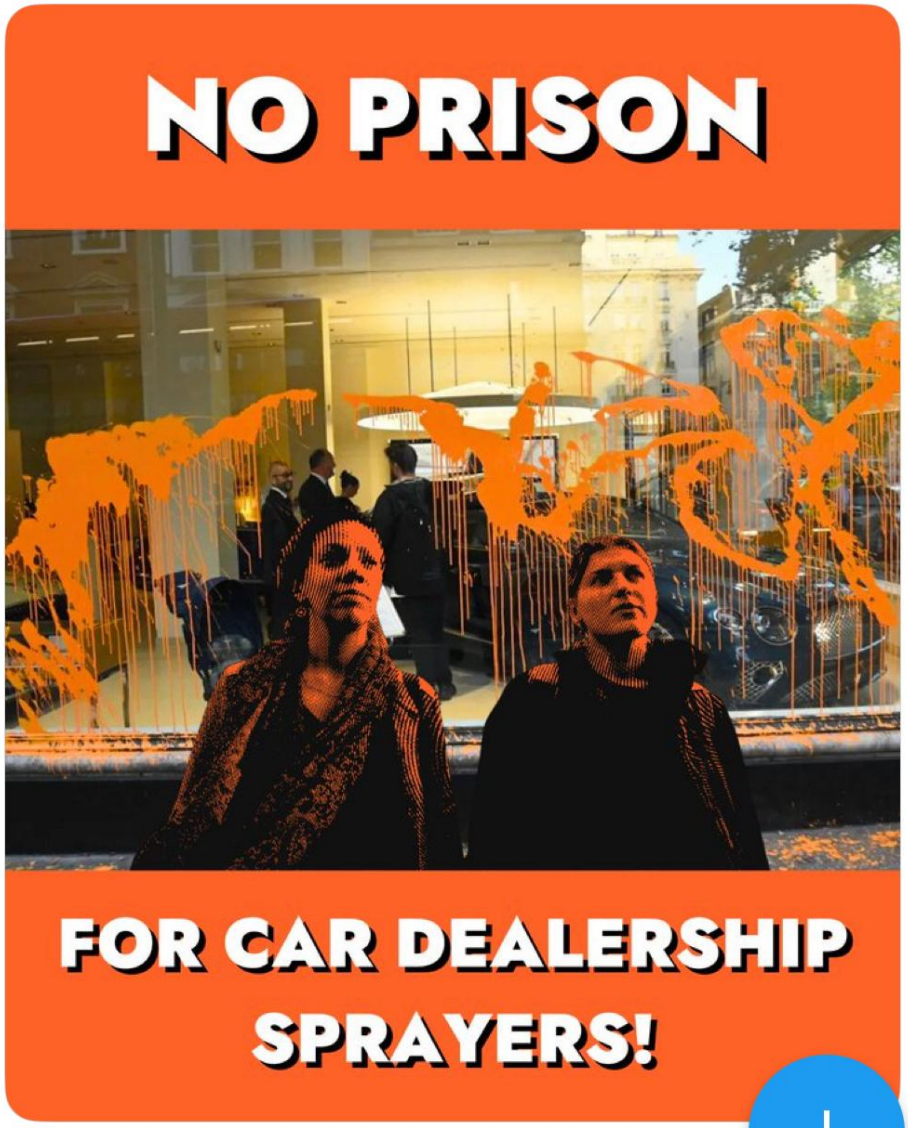
Just Stop Oil @JustSt... · 20/02/2026

🚨 BREAKING: NO PRISON FOR CAR DEALERSHIP SPRAYERS

In October 2022, Carmen and Emma sprayed orange paint over high end car dealerships including HR Owen, Jack Barclay and Ferrari Mayfair, demanding an end to new oil and gas licences Show more



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Just Stop Oil
17 Apr ·

🚨 SLOW MARCHERS FOUND NOT GUILTY BY A JURY... See more



Southwark Crown Court today, two and a half years after slow marching on Waterloo Bridge to demand an end to new oil and gas licensing.

On 8th November 2023, Sheila Shatford, Julia Mercer, David Kilroy, Geraldine James, Rosalind Bird and Gregory Sculthorpe were among approximately 50 supporters who joined a slow march around the IMAX roundabout before heading north over Waterloo Bridge. They were arrested and charged with Section 7 of the Public Order Act 2023: interference with key national infrastructure: an offence which was used for the first time only two days beforehand, and which carries a maximum penalty of 12 months imprisonment, an unlimited fine, or both.

The six appeared before Judge Hiddleston at Southwark Crown Court this week in a trial which had been restarted after one of the original jury fell ill. The jury delivered their

During the five day trial, the Judge denied the defendants all legal defences including reasonable excuse and necessity, and ruled that agreed facts on climate were "irrelevent". The defendants were, however, given around 20 minutes each to talk about their motivations for taking action.

The jury were asked to consider whether the defendents had caused a significant delay to other road users, and if so whether that was their intention or they were reckless as to whether that would have been the result.

The police produced a compilation of video evidence showing the march which demonstrated some traffic buildup, but no evidence of a normal traffic flow at that location. Laura Stockdale, acting for Greg Sculthorpe, questioned whether the jury could be sure that this buildup was more than would normally occur on a weekday in central London.

been less if the police had let the march continue to the other end of the Bridge and if they had not themselves closed the Southbound carriageway. DI Keven Pender for the Metropolitan Police responded that they could not be sure what the marchers were planning to do.

The defendants each emphasised their desire to draw attention to the climate crisis and the care and careful planning that was involved in undertaking a march. All denied that there was any intention to cause anything more than minor slowing of traffic.

In her defence evidence, Sheila Shatford spoke movingly of what inspired her to take action, including a childhood teacher whose family had been affected by the Aberfan disaster in which 116 children were killed. She said: "Only later did I understand that the slag heap belonged to the National Coal Board, and that warnings were given before the disaster, but

She went on to recount how she had learned about the climate emergency and said: "I realised that it's always the poorest and most vulnerable that are most affected and have the smallest voice. I read and found out the climate emergency was real - there is overwhelming evidence that it's happening now, and very soon we won't be able to stop it."

The 2023 Public Order Act was introduced specifically to target climate protest, and named groups such as Extinction Rebellion, Just Stop Oil and Insulate Britain as the reason for its introduction. Although hundreds of Just Stop Oil supporters have been charged with the Section 7 offence and are awaiting trial, as a result of the backlog in courts, this was only the second case to be heard since May 2024.

The first person to be convicted of the offence was Stephen Gingell who was jailed for 6 months after pleading guilty in December 2023.

61 comments 75 shares

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Just Stop Oil

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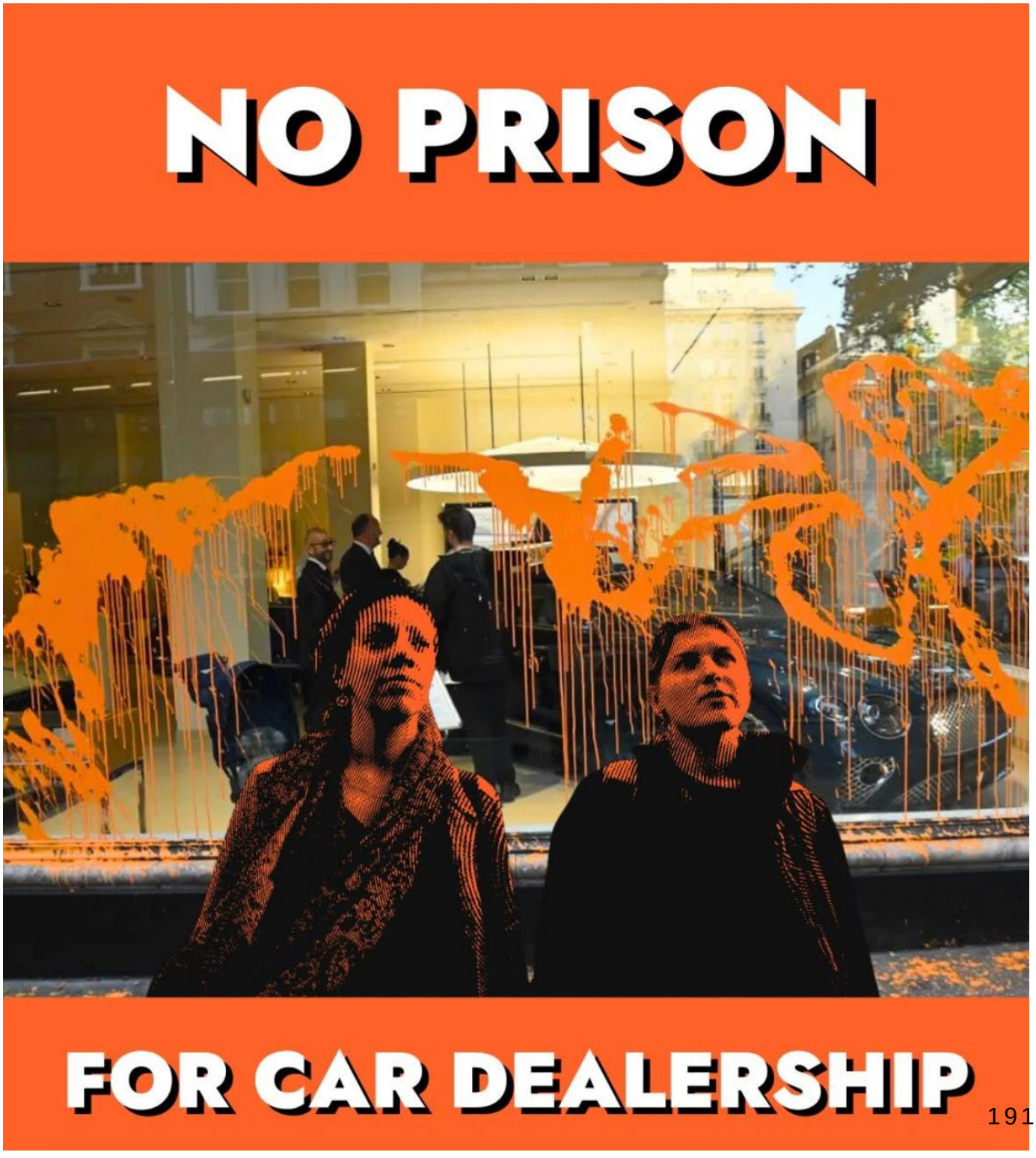
Just Stop Oil
20 Feb ·

🚨 BREAKING: NO PRISON FOR CAR DEALERSHIP SPRAYERS... See more



CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW14

This is the exhibit marked "AJW14" in the witness statement of Alexander James Wright.

Taking back power or taking the mickey? The activists ‘liberating’ food from big stores

A new UK civil resistance group has called for ‘mass shoplifting’ to focus attention on inequality, but recent stunts have led to arrests



Eve Middleton was sitting on a picnic blanket in a park, sharing out vegan biscuits with six fellow activists, when she saw a squad of police bearing down on them. About 30 officers, she said, surrounded the seven young people, and one officer told them: “Don’t run or you’ll be cuffed.”

Another officer focused on gathering evidence. “Whose Oreos are these?” they asked, seizing the biscuits.

“It was pretty farcical, but it’s still frightening when you see that amount of officers running towards you. It’s pretty scary,” said student Bridie Leggatt, another of the seven.

The seven activists had gathered for a “nonviolence training event” – meeting in the park to enjoy the sunny weather.

Leggatt, 22, and Middleton, 25, were among 13 people arrested last weekend in Salford and London as part of a national police crackdown on a new civil resistance group called Take Back Power.

A further 15 arrests had been made in March when police raided a “nonviolence training” event, this time at the Grade II-listed Quaker House in Westminster.

They were all held on suspicion of conspiracy to commit theft, police said, linked to Take Back Power’s campaign of “mass shoplifting” in supermarkets across Britain in a protest against inequality.

On TikTok, the group’s videos show activists of all ages “liberating” rice, pasta, beans, nappies, stock cubes and tinned fruit from supermarkets including Cornwall, London and Manchester.

They pile the goods into cardboard boxes branded with the message: “These things are going to those who need them.” The items are then distributed at local food banks – if they manage to get past security.

Even by today's standards of shoplifting, when supermarket thefts have reached record highs, the mass looting is quite brazen.

Steph Parker, an assistant chief constable at Greater Manchester police, said forces would take "robust action to disrupt this type of organised criminality and it will not be tolerated".

Middleton and her six comrades were held in custody for 24 hours before being released on Monday. For Middleton, like many of the activists, this is not her first encounter with the law.

Many of those involved with the group 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. Neither Middleton or Leggatt wanted to say how many times they had been arrested as they feared a telling off from their parents.

Take Back Power announced itself in December when activists threw custard and apple crumble at a case containing the crown jewels at the Tower of London.



Eight people were charged with criminal damage over the stunts, with four due to appear before Westminster magistrates court on Monday. The group said a total of 50 people had been arrested since December, with the majority detained while taking part in "nonviolence training" events.

On its website, activists are invited to join upcoming action in London "targeting the luxury lifestyle of the super-rich" by "occupying where they play and shop".

A spokesperson for Take Back Power, who would only give his name as James due to the risk of arrest, said the group planned further headline-grabbing stunts this year with the aim of focusing attention on Britain's deepening inequality.

James said the organisation, which wants to see higher taxes levied on the rich and a legally binding citizens' assembly, had no leader "as such". It has raised more than £65,000

in donations in the past four months, according to a fundraising page.

Another of those arrested last weekend, who would only give his name as Mark, said mass shoplifting would have "no real effect" on supermarkets who make billions of pounds in profit.

"Supermarkets are profiting off other people's misery and we can't put up with that," said Middleton, pointing out that Tesco's chief executive, Ken Murphy, was paid £9.2m last year, about 400 times that of the shop's typical worker.

What about the effect on low-paid staff? Will they not risk losing their jobs if mass shoplifting has an effect on company profits?

"It shouldn't be staff that get cut," said Mark, 44, who works in education. "What should get cut are the obscene profits and salaries of the chief executives."

The vegan picnic raided by police last weekend was in Salford's Peel Park – named after Sir Robert Peel, the founder of modern law enforcement whose philosophy of "policing by consent" is a guiding principle of forces today, recognising that those in uniform operate on the basis of public trust rather than fear or force.



Yet the arrests of activists at a training event – rather than for a specific act – appears to run counter to that principle, said Middleton.

Parliament's joint committee on human rights has condemned legislative changes in recent years that it said (pdf) have had "a chilling effect" on the right to protest in England and Wales.

Middleton said the arrests on suspicion of being involved in a conspiracy was part of a wider "repression" of civil resistance in Britain.

"Other groups were able to take part in training without everyone getting arrested," she said. "For doing not as much, the risk of prison is a lot higher."

James, the Take Back Power spokesperson, said the group planned to build up its action with the aim of pushing inequality to the top of the agenda by the next general election, which has to be held by August 2029.

Middleton believes the police crackdown is a sign that the authorities are scared.

“They can see that Take Back Power does speak to a lot of this country’s people [who are] fed up with inequality. They are scared of what it could become.”
■

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW15

This is the exhibit marked "AJW15" in the witness statement of Alexander James Wright.

Four taken into custard-y as Take Back Power ‘crumble and custard’ the Crown Jewels



Two supporters of Take Back Power have smothered dessert over the crown jewels. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen’s assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 09:50 this morning, two Take Back Power supporters covered the glass containing the crown jewels in custard and apple crumble. They then held a sign which read ‘DEMOCRACY HAS CRUMBLED- TAX THE RICH’. By around 10:30, the two action takers and two others had been taken into custard-y by police.

Today’s action comes as all donations to Take Back Power will be doubled until midnight on Sunday the 7th December! You can donate and have your donation doubled here. [2]

A Take Back Power spokesperson said:

"Since 2011, the poorest 10% of households have paid a combined tax rate of 44% on their income and wealth gains, while the richest paid 22%. Our political class, be it this government, Reform or Tory, serve the super-rich; they do not care about working people. That's why we must demand real democracy, with ordinary people at the heart of decision making, through a citizen-led assembly that has the power to tax the rich." [3]

One of those taking action today is Miriam Cranch, 21, a retail worker from Leeds, who said:

"Britain is broken because the super rich are pocketing billions, whilst working people struggle to get by."

"This wealth inequality is leading us towards civil unrest, and it doesn't have to be this way. Billionaires should not pay a lower tax rate on wealth they generate doing nothing, than those of us working jobs. It's time ordinary people get a say on how to tax wealth with a permanent House of the People."

Also taking action today is Zahra Ali, 19, a student from London, who said:

"Our country is crumbling before our eyes! We have homeless people dying on the very streets that King Charles passed on his way to the coronation, whilst there are more empty homes than unhoused people in this country."

"It's time the ultra rich pay their fair share. We demand a permanent House of the People. It's time to take back power, tax the rich and fix Britain! Join us at takebackpower.net."

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net.

ENDS

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW16

This is the exhibit marked "AJW16" in the witness statement of Alexander James Wright.

~~Wed, Jul 22, 2026, 8:00 pm~~ 8:00 pm	~~Welcome Event~~	~~London, E1~~ 5QJ	~~Register~~

Follow us on social media.

—

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, 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!**

—

Contact us
General: info@takebackpower.net
Press: press@takebackpower.net
Fundraising: giving@takebackpower.net

Get the newsletter

First name *

Email *

Postcode

Country

-

I agree to the privacy policy *

Register

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW17

This is the exhibit marked "AJW17" in the witness statement of Alexander James Wright.

What is Take Back Power and what does it want?



– 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.

+ What is Take Back Power's demand?

+ What is the House of the People?

+ What would the House of the People do?

+ Has an institution like this existed before?

+ Don't the super-rich already pay too much tax?

+ How rich are we talking about here?

+ How bad is inequality in the UK?

+ What sort of tax would you like to see?

+ Even if you tax the rich it won't be enough to fix Britain will it?

+ How would you spend the money raised?

+ Why does Take Back Power engage in disruptive direct action?

+ How is Take Back Power funded?

+ How can I get involved?

What is Take Back Power and what does it want?



+ What is Take Back Power?
+ What is Take Back Power's demand?
+ What is the House of the People?
+ What would the House of the People do?
+ Has an institution like this existed before?
+ Don't the super-rich already pay too much tax?
+ How rich are we talking about here?
+ How bad is inequality in the UK?
+ What sort of tax would you like to see?
+ Even if you tax the rich it won't be enough to fix Britain will it?
+ How would you spend the money raised?
– 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. You can read more about how this works here.

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
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(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW18

This is the exhibit marked "AJW18" in the witness statement of Alexander James Wright.

(https://takebackpower.net)

‘Inequality is shit’ — Take Back Power deliver crappy Christmas for the Ritz

December 3, 2025(https://takebackpower.net/2025/12/03/)



Three supporters of Take Back Power have delivered a pile of shit to the Ritz. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen’s assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 12:05 today, three Take Back Power supporters deposited a pile of manure below the Christmas tree at the iconic luxury hotel. The three were quickly removed from the lobby and then held signs outside the entrance which read: ‘INEQUALITY IS SHIT’ & ‘TAX THE RICH’.

A Take Back Power spokesperson said:

"The super-rich have more than doubled their wealth since the pandemic, while this Christmas, a third of UK children suffer and grow up in poverty. It's time ordinary people – those most affected by inequality, get a say in deciding how to tax wealth through the means of a legally binding citizen's assembly- a House of the People." [2][3]

One of those taking action today, Ellen Redwood-Brown, 23, an NHS worker, said:

"The billionaires, corporations, and corrupt politicians running Britain don't care about us. While working in the NHS I've seen people dying because they couldn't get appointments whilst doctors are working 15 hour shifts."

"The UK has 156 billionaires. We could take away 75% of that wealth to fix Britain and we'd still have 156 billionaires. We must let ordinary people decide how to tax the rich." [4]





Also taking action today is Tom Barber, 65, a former doctor, journalist and community worker from Nottingham, who said:

"Power is concentrated in the hands of a small group of obscenely wealthy and ruthless individuals. They are hell-bent on enriching themselves, forcing the gap between the haves and the have-nots ever wider."

"Everyday people must Take Back Power, compelling our government to create a permanent citizens' assembly- a House of the People. Only then can we start making decisions for everyone's benefit- taxing the rich, creating a fairer society and restoring our faith in our democracy."

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

(https://takebackpower.net)

Four taken into custard-y as Take Back Power ‘crumble and custard’ the Crown Jewels

December 6, 2025(https://takebackpower.net/2025/12/06/)



Two supporters of Take Back Power have smothered dessert over the crown jewels. Take Back Power is a new nonviolent civil-resistance group, demanding that the UK government establish a permanent citizen’s assembly- a House of the People, which has the power to tax extreme wealth and fix Britain. [1]

At around 09:50 this morning, two Take Back Power supporters covered the glass containing the crown jewels in custard and apple crumble. They then held a sign which read ‘DEMOCRACY HAS CRUMBLED- TAX THE RICH’. By around 10:30, the two action takers and two others had been taken into custard-y by police.

Today's action comes as all donations to Take Back Power will be doubled until midnight on Sunday the 7th December! You can donate and have your donation doubled here (https://donorfed.org/project/take-back-power?utm_source=tbpnet&utm_medium=websitet&utm_content=tbphome&utm_term=doubletop) (https://takebackpower.net) [2]

A Take Back Power spokesperson said:

"Since 2011, the poorest 10% of households have paid a combined tax rate of 44% on their income and wealth gains, while the richest paid 22%. Our political class, be it this government, Reform or Tory, serve the super-rich; they do not care about working people. That's why we must demand real democracy, with ordinary people at the heart of decision making, through a citizen-led assembly that has the power to tax the rich." [3]

One of those taking action today is Miriam Cranch, 21, a retail worker from Leeds, who said:

"Britain is broken because the super rich are pocketing billions, whilst working people struggle to get by."

"This wealth inequality is leading us towards civil unrest, and it doesn't have to be this way. Billionaires should not pay a lower tax rate on wealth they generate doing nothing, than those of us working jobs. It's time ordinary people get a say on how to tax wealth with a permanent House of the People."

Also taking action today is Zahra Ali, 19, a student from London, who said:

"Our country is crumbling before our eyes! We have homeless people dying on the very streets that King Charles passed on his way to the coronation, whilst there are more empty homes than unhoused people in this country."

"It's time the ultra rich pay their fair share. We demand a permanent House of the People. It's time to take back power, tax the rich and fix Britain! Join us at takebackpower.net (https://takebackpower.net)."

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ENDS

(https://takebackpower.net)

Take Back Power supporters call on Starmer to cut the corruption and resign by ‘locking-on’ at Parliament

February 6, 2026(https://takebackpower.net/2026/02/06/)



Two young people have called on Keir Starmer to cut out corruption and resign by ‘locking-on’ outside Parliament. They are supporters of Take Back Power, a nonviolent civil-resistance group, demanding that the UK government establish a ‘House of the People’- a permanent citizen-led assembly with the power to tax extreme wealth. [1]

At 9am this morning, two young people carrying a giant Keir Starmer papier mache head locked themselves in front of Carriage Gate, blocking access to Parliament. They could be seen holding placards which read “Cut the Corruption”. By around 10am police arrived at the scene and had cut through the papier mache head.

A spokesperson for Take Back Power said:

"We're calling on Keir Starmer to resign. While Lord Mandelson is gone, the system that protected and empowered him remains. It's time to cut out the corruption at the heart of our democracy. While corporations and the super rich are splashing their cash to buy access to ministers and seats in the House of Lords, ordinary people are struggling to afford basic necessities."

"We need a radical overhaul so that democracy works for all of us, not just the privileged few. We have politicians in the pockets of billionaire pedophiles, they don't work for us. We need ordinary people in charge through a House of the People."

One of those taking action today is Alice Jones, 20, a student from Manchester, who said:

"It is absurd that we live in a country where 156 billionaires hoard wealth, splashing out on private jets, whilst ordinary people have to choose between heating their homes, or feeding their children; all while our country quickly descends into fascism."

"The politicians in our country are failing us. Ordinary people are being left to survive with the scraps: a crumbling NHS, extortionate food prices, and ever rising bills. The UK needs a permanent House of the People. It's time to take back power, tax the rich and fix Britain! Join us at takebackpower.net (https://takebackpower.net)."





(Left image credit to Jamie Lowe. Right image and main image credit to Will Colebourne.)

Also taking action is Bridie Leggatt, 22, who is also a student from Manchester, who said:

"Spiralling wealth inequality is leading us to societal collapse. Our country is the sixth richest nation and yet it is home to 4 million children living in poverty. Our political system doesn't function fairly. We need ordinary people in the decision making seats deciding how to fix this; not corrupt politicians in the pockets of the super rich."

“There IS a solution to inequality, but our government simply won’t do what’s necessary. We cannot let political parties use scapegoated minorities to distract us from what is needed: a tax on the super rich.”

(https://takebackpower.net/)





(Image credit to Will Colebourne.)

Today’s action comes just days after the MET police began criminal investigations into Peter Mandelson, Starmer’s former ambassador to the US, over allegations that he passed market-sensitive information to the pedophile financier Jeffrey Epstein.

New allegations from recently released Epstein files also allege that Peter Mandelson’s husband accepted money from Jeffrey Epstein after his prison sentence over child sexual offences. [2]

But the corruption doesn’t end there, recent research by the Guardian showed that almost a third (266 out of 800) members of the House of Lords have given donations to political parties, some 115 of them before they were given peerages. [3]

Recent media reports have revealed that Labour government ministers have met with the arms industry, banks and big oil hundreds of times, while half the cabinet have taken cash from pro-Israel lobbyists. The Party even offered sponsorship deals for £55,000 to allow businesses to host lunches for ministers at the Labour conference. [4][5][6]

Meanwhile, inequality is spiralling out of control. Student nurses say they are sleeping in their cars, going to food banks and relying on lecturers to buy them food, while nearly half of Brits would struggle to pay for basic necessities if they lost their jobs. Given this, it is not surprising that faith in political institutions has collapsed, with 87 per cent of Britons across all parties having either not very much trust in politicians or none at all. [7][8][9]

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen’s assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takepackpower.net).

ENDS

(https://takebackpower.net)

Police arrest 15 Take Back Power supporters at a nonviolence training event

March 5, 2026(https://takebackpower.net/2026/03/05/)



15 Take Back Power supporters were arrested during a nonviolence training this evening being held in the Westminster Quaker Meeting House. Take Back Power is a nonviolent campaign demanding a tax on extreme wealth, to be decided by a 'House of the People.' [1]

At around 18:35 a number of police officers forced entry into the Westminster Quakers meeting house. They proceeded to arrest 15 people on suspicion of conspiracy to commit theft. Two of those arrested were acting as legal observers. During the raid an ambulance had to be called as one person

suffered a panic attack after being arrested. Those arrested were sent to Brixton and Walworth police stations where one person was subsequently bailed. 14 remain in custody. [2]

(https://takebackpower.net)

A Take Back Power spokesperson said:

“The police arrested fifteen ordinary people in a place of worship for discussing nonviolent civil disobedience. This draconian overreach shows what the state is willing to do to protect corporate profits and billionaires, while ordinary people struggle to put food on the table.

The state is scared of civil disobedience because it works. But when the super-rich have captured our politics, nonviolent civil disobedience is the only choice we have to take back our power. Now more than ever, we need everyone to join us: sign up at takebackpower.net.”

In their statement, the MET police referenced last year’s unprecedented raid on Westminster Quakers and the arrests of Youth Demand supporters meeting about the genocide in Gaza, which drew widespread condemnation from faith groups. One of the people arrested this evening had also been previously arrested during last year’s raid on Westminster Quakers. [3]

ENDS

(https://takebackpower.net)

Take Back Power supporters redistribute food from supermarkets to those most in need

March 14, 2026(https://takebackpower.net/2026/03/14/)



Take Back Power supporters have been redistributing food from supermarkets to local foodbanks across the country this morning. Take Back Power is a nonviolent civil-resistance group, demanding that the UK government establish a ‘House of the People’- a permanent citizen-led assembly with the power to tax extreme wealth. [1]

From around 8:30 this morning, teams across four UK cities- Manchester, London, Exeter and Truro, entered supermarkets and began putting food and necessities into boxes emblazoned with ‘These things are going to those that need them’. The Take Back Power supporters left the shops without paying for the produce and then redistributed these items to local food-bank drop off points.

In Exeter, a team of five supporters took five boxes of produce from Morrison’s supermarket in Prince Charles Road, however were stopped by security who took away two of five boxes. The remaining three boxes were successfully

liberated and taken to a local food-bank drop off point.

Food Bank, in London, on liberating boxes of food, two supporters set up a stall outside Sainsburys in the Lewisham centre, to give the food back to the local community. Security staff arrived by around 9:40 and police arrived onsite at around 9:50. No arrests have been made as of yet and the supporters left at around 10am.

(https://takebackpower.net)

In Manchester, three action takers filled boxes with food from Tesco, on Pars Wood Lane in Didsbury. All three left the store without incident and redistributed the food to a food-bank drop off point at a local Aldi.

In Truro, two supporters loaded boxes from the Sainsburys on Treyew Rd and left the produce at the foodbank drop-off point in the same store.

A spokesperson for Take Back Power said:

"It is sickening that 6.5 million people in the UK are forced to turn to food banks every year and a third of children under five are living in homes where there is insufficient access to nutritious food. This is because our country is in crisis, with billionaires hoarding wealth, whilst ordinary people suffer. We need to tax extreme wealth to fix Britain, and we need ordinary people to decide how."







(Credit for image on the left and far right to The Canary)

One of those taking action today is Eve Middleton 25, from Manchester, who said:

"I refuse to sit by while billionaires hoard wealth and capture our democracy. We can all see the impacts of inequality on our streets, in our schools and hospitals and in our own homes. Taxing the super rich is the first simple step to solving these crises. Yet our political system will not deliver a wealth tax, as it is rigged to

benefit parasitic billionaires instead of the masses. It's time for ordinary people to be put at the heart of decision making, through a House of the People with powers to tax the rich and fix Britain."
(https://takebackpower.net)



(Credit for image to The Canary)

Also taking action is Ruth Cook, 74, a company director from Somerset, who said:

"I'm taking this action and risking arrest because we have a terrible situation in this country. Families are struggling and children are going hungry, while the profits some companies make are obscene. The answer is to tax the super-rich. I'm taking this food and delivering it to a food bank collection point because we need to do something about this. We need to tax the super rich and give ordinary people a say in how our taxes are spent. Join us at takebackpower.net (https://takebackpower.net)."





Today's action comes in the wake of the raid of a Quakers meeting house and the arrest of 15 people during a nonviolence training last week. One other was arrested at their home on Thursday and the houses of seven supporters have been raided by police in connection with these actions so far. (https://takebackpower.net)

This occurs as the UK remains in crisis. Last year, 14 million people in the UK faced the prospect of going hungry due to a lack of money. Whilst in 2024, 6.5 million people turned to food banks. [2]

Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Seven arrested at Nonviolence training event as Take Back Power supporters homes raided

April 19, 2026(https://takebackpower.net/2026/04/19/)



Seven people have been arrested at a nonviolence training event held in London. The training was held by Take Back Power, a nonviolent campaign demanding a tax on extreme wealth, to be decided by a 'House of the People.' [1]

At around 12:30 yesterday, dozens of officers raided Millman Street Community Centre in London. Officers arrived in three vans, arresting six people under suspicion of 'conspiracy to commit theft.' One of those arrested was an undercover Daily Mail journalist.

At around 15:20 on Saturday the home of Take Back Power supporter was also raided. The supporter wasn't home and on learning there was a warrant for their arrest they handed themselves in. The police subsequently raided their home for a second time at around 2am this morning.

This weekend's raids occur as Take Back Power supporters joined a counter demonstration in Manchester yesterday, opposing Britain First, a far-right demonstration which was marching in the city. Groups opposing fascist demonstrators were kettled, beaten with trunchons and pepper-sprayed by police.

A Take Back Power spokesperson said:

"Once again the police are raiding homes and community centres, arresting people for simply learning about nonviolence. Meanwhile, police protect fascists marching in Manchester and kettle and beat counter-protestors instead. Such is the state of civil liberties in the UK in 2026. The government and police care more about protecting the interests of corporations and billionaires than protecting the people of this country. We've got to make politics work for ordinary people. We need a House of the People with powers to tax the billionaires destroying this country. If you want to help us make it happen sign up at takebackpower.net (https://takebackpower.net)."





On Saturday, police also attended and shut down a nonviolence training being held in Falmouth, no arrests were made, however the event was cancelled.

Today's raids continue the escalating repression being imposed on nonviolent campaigns. Police have so far shut down four nonviolence trainings held by Take Back Power, in some instances raiding places of worship.

These raids echo the widely unpopular and unprecedented raid in 2025 on Westminster Quakers where Youth Demand supporters were meeting to discuss the genocide in Gaza, which drew widespread condemnation from faith groups. [2]

ENDS

(https://takebackpower.net)

“Nigel for Sale”- Take Back Power takes action at Sotheby’s

April 27, 2026(https://takebackpower.net/2026/04/27/)



Two Take Back Power supporters have taken action at Sotheby’s auction house. Take Back Power is a nonviolent campaign demanding a tax on extreme wealth, to be decided by a ‘House of the People.’ [1]

At around 11:15 this morning, two Take Back Power supporters covered a painting at Sotheby’s Orientalist art pre-auction exhibition, with a picture of Nigel Farage’s face. The image read *“Nigel for sale: £100,000- bought by Sotheby’s”*. The painting covered is King Wilhelm I’s Arabian Stallion ‘Tursi’ by Friedrich Nerly, which is expected to sell for between £80,000- £120,000.

By around 11:35 the action takers had been removed from the building by security, however police didn’t arrive on the scene. At around mid-day, the action takers attempted to hand themselves in at Charing Cross police station. Thus far, no arrests have been made.

Sotheby's describes itself as *the 'world's premier destination for art and luxury'.* Best known for its fine art auctions, it also has a luxury real estate company — Sotheby's realty which has donated £100,000 to Reform. [2] (https://takebackpower.net)

A Take Back Power spokesperson said:

"Reform claims to be on the side of working people. If that were true, why would the 'world's premier destination for art and luxury', be giving them a donation of £100,000 in exchange for yet more tax breaks on the super rich if they get into power?"

"Reform is another party of the same corrupt corporations and super-rich who are destroying our country, putting the burden of fixing Britain onto working people. In order to fix Britain we need a mass redistribution of wealth and power away from the 1%, back to working people. Help us fix Britain at takebackpower.net (https://takebackpower.net)."





One of those taking action today is Elvis, a delivery driver from Bolton, who said:

"I'm taking action with Take Back Power in order to highlight corruption and inequality in the UK. Sotheby's have donated 100,000 to Reform plc, in exchange for more tax breaks for the super wealthy if they get elected."

"Meanwhile millions of families still struggle to put food on the table every single day. We can make a change if we all come together and build a system that's fairer and more representative of the British people. To find out more go to takebackpower.net (https://takebackpower.net)."

Also taking action today is Jimmy, 74, a retired NGO worker, from London who said:

"There was a time when the super-rich would be taxed at a much higher rate than ordinary working people, and we had a functioning health system and affordable housing. Nowadays corporations and billionaires pay next to no tax through using loopholes and offshore accounts."

“Reform wants to give even more tax breaks to the super wealthy who are already breaking Britain. We need ordinary people at the heart of deciding how to tax extreme wealth to begin fixing Britain. This is why we are calling for a permanent citizen’s assembly, with the power to tax extreme wealth- a ***House of the People****.”*

Reform is backed primarily by the super-rich and corporations. This includes donations from crypto-billionaire Christopher Harborne, Claudia Harmsworth, wife of the owner of the Daily Mail- Lord Rothermere, and London’s leading luxury interior designers- Interior Architecture Landscape. [2]

We need to Take Back our Power from the super-rich, which is why Take Back Power is demanding that the UK government establish a permanent House of the People- a citizen’s assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Take Back Power ‘take over’ the playgrounds of the super-rich

April 30, 2026(https://takebackpower.net/2026/04/30/)



Take Back Power supporters have been ‘taking over’ the playgrounds of the super-rich this morning. Take Back Power is a nonviolent campaign, demanding a tax on extreme wealth, to be decided by a ‘House of the People.’ [1]

At around 10 this morning, 22 Take Back Power supporters occupied a Ferrari dealership in Berkeley Square, they could be heard chanting “WE DEMAND EQUALITY!” and “THE BILLIONAIRES HAVE GOT TO GO!”. By around 10:30 the group left the store.

At around 11:30, the group reconvened at Burlington Arcade- the world’s first modern shopping mall, which positions itself as an ‘elegant and exclusive upmarket shopping venue’. The group could be seen holding signs which read “HOUSE OF THE PEOPLE” and “4 MILLION KIDS IN POVERTY”, which were quickly seized by door staff.

By around 12:20, the group had moved on to the food hall at the luxury department store, Harrod's. Security was much more reactive, dragging Take Back Power supporters from the building.

(https://takebackpower.net)

A Take Back Power spokesperson said:

"This country is in crisis and everyone knows it! The people to blame are the corporations and super-rich who are extracting every last penny from working people, and then using their ownership of the media to distract people into blaming the poor and migrants. Nothing short of a massive transfer of wealth and power away from the 1% and back to working people can hope to fix Britain. Join us at takebackpower.net (https://takebackpower.net)."





One of those taking action today is Robert Pembroke, 43, a builder and dad from Devon, who said:

It's time ordinary people take back our power from the super-rich. Inequality is spiralling out of control, 50 families in the UK hold more wealth than 50% of the country. Around the world, it's even worse with eight men holding more wealth than 50% of the world's population!"

"It is obscene to allow this, people are dying. We need ordinary people, taking part in a permanent citizens' assembly- a ***House of the People*** *deciding how to tackle this. To find out more go to takebackpower.net (https://takebackpower.net)."*





Also taking action today is Ana Heyatawin, 63, a grandmother from Somerset, who said:

"Inequality, which is being imposed on ordinary people by big business, billionaires and the politicians who work for them, is killing people right now. More than a third of people in the UK now don't earn enough to buy life's essentials."

"We need ordinary people at the heart of deciding how to tax extreme wealth to begin fixing this mess. This is why we are calling for a permanent citizen's assembly, with the power to tax extreme wealth- a ***House of the People****."*

It's time working people take back our power from the super-rich. This is why Take Back Power is demanding that the UK government establish a permanent **House of the People—** a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

(https://takebackpower.net)

Take Back Power supporters redistribute essential items whilst occupying high-end stores and hotels

May 1, 2026(https://takebackpower.net/2026/05/01/)



Take Back Power supporters have been occupying the playgrounds of the wealthy this morning, and have liberated items from a superstore to redistribute them back to the communities that need them. Take Back Power is a nonviolent campaign, demanding a tax on extreme wealth, to be decided by a **'House of the People.'** [1]

At around 9 this morning, three Take Back Power supporters entered the Tesco Extra on Acre Lane in Brixton, and took essential items from the shelves and left without paying. The action takers then donated the items at a local food-bank

drop-off point. At around 10am, all three attempted to hand themselves in at Brixton Police Station. So far none have been arrested.

At 11:45, around a further 18 Take Back Power supporters occupied the luxury department store Liberty, on Regent Street in London. They could be seen holding signs which read '3 MILLION HOUSEHOLDS SKIPPING MEALS' and 'TAX THE SUPER-RICH NOW.'

At around 1pm, this group then reconvened, disrupting access to the luxury hotel, Claridges. The group could be heard chanting "WE DEMAND EQUALITY!' and 'HOW DO WE TAX THE SUPER RICH?- A HOUSE OF THE PEOPLE!' as security attempted to move the supporters away from the door.

A Take Back Power spokesperson said:

*"Take Back Power is calling for an emergency '**House of the People**' to deal with the cost of living crisis. When politicians are too busy lining their pockets to fix our problems, we need the people most impacted to have a seat at the table. A **House of the People** selected by democratic lottery, like a jury, is a no-brainer solution to cut out the corruption and decide how to redistribute wealth."*





One of those taking action redistributing food today is Moshe Dixon, 25, from Dundee said:

"My mother came from poverty and fought tooth and nail to give me a better future. Like so many mothers she was promised that hard work would be rewarded, yet we are living in a country where so many families can't make ends meet despite working multiple jobs."

"6.5 million people had to turn to foodbanks in 2024. Meanwhile the CEO of Tesco is taking home 430 times the pay of the average Tesco employee, and the rich are paying a smaller share of tax than working people. We need an assembly of ordinary people coming together to decide how to tax extreme wealth in order to fix our broken country. Join us at takebackpower.net (https://takebackpower.net)."



(https://takebackpower.net)



Also taking action today occupying high-end stores and hotels, is Hannah McDonald, 20, a student from Liverpool, who said:

"Fourteen million people last year were faced with the prospect of going hungry, in this, the 6th richest nation on earth! Now we have a cost of living tsunami on the way and the government is nowhere to be seen."

"This is broken Britain. We need a ***House of the People****— an assembly with real power, where ordinary mums, nurses, posties & cleaners, get a real say in how to take back our power from the super rich, and redistribute that wealth and power back to working people."*

Today's actions come as the UK braces for food shortages and soaring prices as a result of the war in Iran, as rising fuel, fertiliser and commodity prices begin to feed into business costs. [2]

It's time we take on the super-rich who are profiteering from a world in crisis. This is why Take Back Power is demanding that the UK government establish an emergency **House of the People—** a citizen's assembly chosen by democratic lottery, that has the power to tax extreme wealth and fix Britain.

Until the government makes a meaningful statement in response to our demand, we will undertake nonviolent action to resist the super-rich, who are driving us towards social collapse. Donate or sign up to take action at TakeBackPower.net (https://takebackpower.net).

ENDS

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW19

This is the exhibit marked "AJW19" in the witness statement of Alexander James Wright.

Look what you made me do.



Two young people received suspended sentences today for spray-painting two private jets at Stansted Airport in June 2024 to demand the UK government negotiate a treaty to phase out oil and gas by 2030. [1]

They were found guilty of criminal damage at Chelmsford Crown Court in September. Jennifer Kowalski, 29, from Dumbarton recieved a 5 month custodial sentence suspended for 12 month, Cole Macdonald, 23, from Brighton was handed a six week custodial sentence suspended for 8 months plus 20 days rehabilitative activity. The two had cut through the wire perimeter fence at Stansted and sprayed paint from a fire extinguisher onto two private jets parked at Stansted Airport, just hours after Taylor Swift's plane had landed. [2]

At trial, the prosecution claimed the planes required extensive professional cleaning costing about £12,000. Judge Mill ruled the damage too serious for the defendants to rely on their rights to free expression and assembly under Articles 10 and 11 of the European Convention on Human Rights. The jury was therefore not allowed to consider whether restricting those rights was a proportionate response to the alleged damage. [3]

After their arrest both were held for 11 days on remand, until released on bail. Cole then spent 39 weeks on curfewed tag (this equals a four month custodial sentences) While tagged Cole was arrested five times for breach of bail, approximately once every two months. Once she was being held in police custody, another time she was in hospital seeking treatment for back pain after informing the monitoring service. None of the five arrested resulted in breaching bail being proven.

Before sentencing Jennifer Kowalski, 29, a former sustainability manager from Dumbarton, said:

"Whilst Taylor and her fans have been celebrating her eras, we have entered a new one – the era of global boiling. This is an era that will not end with a rebrand; it will end all others. As a former Swiftie, I know what Taylor stands to lose, because there is no folklore without human culture, no music on a dead planet.

"The court system can take our freedom, our autonomy, our dignity, and deny us basic rights. But they can never take my convictions, to fight for a future for us all. Whatever happens in a court room, that is who I am today, and they can never change that."

A Just Stop Oil spokesperson said

This trial, the saga of mismanaged draconian bail conditions and the sentences demonstrates, again, the establishment will protect the wealthy and privileged while punishing those seeking to protect us and defend our freedoms and natural justice.

In just seven months of 2022, Taylor Swift's private jet logged 170 flights – 15.9 full days in the air, averaging 80 minutes and 139 miles per trip. Yard, the sustainability marketing firm that compiled the data, estimated her total carbon emissions at 8,293.54 tonnes of CO_2, more than 1,100 times that of an ordinary person over an entire year. [4]

A study published in Nature and reported by National Geographic found that private aviation generated at least 15.6 million tonnes of CO_2 in 2023, with an average of 3.6 tonnes emitted per flight. Almost half of all private-jet journeys were under 500 kilometres,

and around one in five covered less than 200 kilometres, distances that could often be travelled by rail or road. The researchers noted that some aircraft models can emit more carbon in a single hour than an average person produces in an entire year. [5] [6]

The music industry, and even artists of Taylor Swift's stature, are not shielded from the accelerating climate collapse. In November 2023, 23-year-old Ana Clara Benevides collapsed and later died from heat exhaustion while attending Swift's concert in Rio de Janeiro during a record-breaking heatwave that pushed temperatures above 40°C. [7]

In recent months, the musician Steve Miller cancelled his entire North American tour citing the growing threat of extreme weather, describing the decision as unavoidable in light of intensifying heat, floods and wildfires. Artists and organisers are already facing rising costs, cancellations and safety risks as performances are disrupted by record temperatures and severe storms. Extreme weather, driven by fossil fuel combustion, is already endangering lives and reshaping the conditions in which global entertainment operates. [8]

ENDS

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW20

This is the exhibit marked "AJW20" in the witness statement of Alexander James Wright.

FØSSIL FREE LONDON



Fossil Free London is 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. We advocate for a rapid and just transition towards a sustainable and equitable society.

In London? **Sign up to a welcome talk.**

Or join our **mailing list** and follow us on social media.

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CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

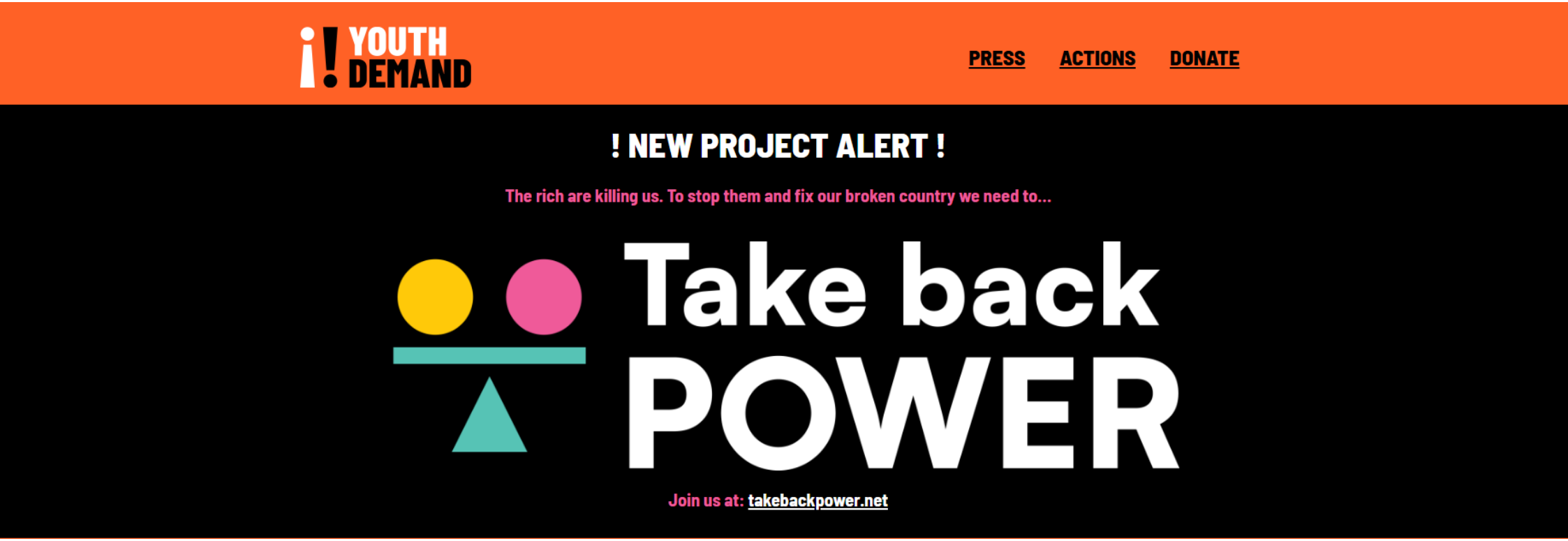
- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW21

This is the exhibit marked "AJW21" in the witness statement of Alexander James Wright.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CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW22

This is the exhibit marked "AJW22" in the witness statement of Alexander James Wright.

Two Just Stop Oil supporters found guilty for Heathrow paint spraying following retrial

by **The Canary** — 14 May 2026 in **News**, **UK** Reading Time: 4 mins read

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Two Just Stop Oil supporters who sprayed Heathrow departure boards with orange paint during the Oil Kills international uprising to end fossil fuels in July 2024 have been found guilty in a retrial after the jury in an earlier trial failed to reach a majority decision.

Phoebe Plummer and Jane Touil were appearing before Judge Duncan at Isleworth Crown Court for the second time on a charge of criminal damage over £5,000 for their action on 30 July 2024 to demand a fossil fuel treaty to end oil and gas by 2030.

The jury took four-and-a-half hours to reach a majority verdict of 10-2. Following the verdict, Touil said:

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> *Since I took action, global fossil fuel use and emissions have continued to rise. More than ever, we need a global fossil fuel treaty to help governments rapidly phase out fossil fuels.*
>
> *What we do at this moment in history matters. But there is a difference between laws and morality. The courts apply the law made by powerful people. Morals come from within. It is our morals that give us our conscience. I have always tried to live according to my conscience.*

Plummer said:

> *The climate crisis is the greatest injustice that humanity has ever faced. We should all consider what to do at this time. No individual caused this crisis and no one is solely responsible for stopping it. But we can choose what we do to alleviate suffering.*
>
> *I feel compelled to act to be a responsible citizen, a loving aunt and a good person. It compels me to hope for a better future and one where my nephew grows up.*
>
> *I didn't think the action would change government policy. But non violent civil resistance is a necessary part of tackling the climate crisis and I'm grateful and proud to have been part of that.*

Plummer was remanded for 58 days and Touil for 14 days following the 2024 action in which the pair used fire extinguishers to spray diluted water-based paint in Heathrow Terminal 5 including at the departure boards. The Crown alleged that the action caused £8,000 worth of damages and that three of the display screens needed to be replaced.

Judge ruled out various defences for Heathrow action

At trial, Judge Duncan ruled out several legal defences for the action including those of 'reasonable excuse' under Articles 10 and 11 of the ECHR, 'necessity' and 'self defence' on the grounds that the threat from climate change was not proximate enough and the actions too far removed from the threat.

The defendants were allowed to argue belief in consent: that they honestly believed the owners of Heathrow would have consented to the damage if they knew of its circumstances. However, evidence of the relevant circumstances was to be limited to the fact that it was a climate protest with all evidence about the scale and urgency of the climate crisis ruled 'irrelevant and therefore inadmissible'.

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In giving evidence, Touil said:

> *I genuinely and sincerely believed that if the shareholders [of Heathrow] had a full understanding of the situation we are in they would have given their consent to our action.*
>
> *Most people believe there is something that is wrong with climate but not many people have access to the full situation because the fossil fuel industry has used their immense wealth to ensure that governments do not act and it is not reported in the mainstream media.*
>
> *So I don't know if shareholders have a full understanding, but I know that if they did, they would be doing all in their power to stop fossil fuels because there will be no business as usual, no functioning society, half the population could be wiped out along with 50% of global GDP. I think shareholders want to protect their investment but they also want a future for their kids.*

In her evidence Plummer said:

> *I want to make it very clear that this was not a protest against Heathrow, or anyone flying through Heathrow that day. It's true that the aviation industry is especially harmful to the climate in terms of emissions, though it is a small number of frequent fliers and private jet users who cause the vast majority of this harm, not families who save up for a holiday once a year.*
>
> *But this wasn't about getting people to stop flying. I made this individual change to live in line with my values, but honestly I know that it's pretty inconsequential. Even if we all woke up tomorrow and stopped flying and went vegan, it would be like mopping up a spill from an overflowing bath whilst leaving the tap on.*
>
> *All individual changes are like this when we are facing a systemic issue. If fossil fuels are extracted from the ground, then they will all be burnt, even if it's not on a flight that you're on. We need*

> *systemic change, that has always been Just Stop Oil's demand.*
>
> *My intention was not to cause damage. My intention was to take part in an act of nonviolent civil resistance, raising a serious alarm bell to the catastrophic future in store for us if we persist in our addiction to fossil fuels.*

Featured image via Just Stop Oil

Tags: climate crisis fossil fuels Just Stop Oil protest

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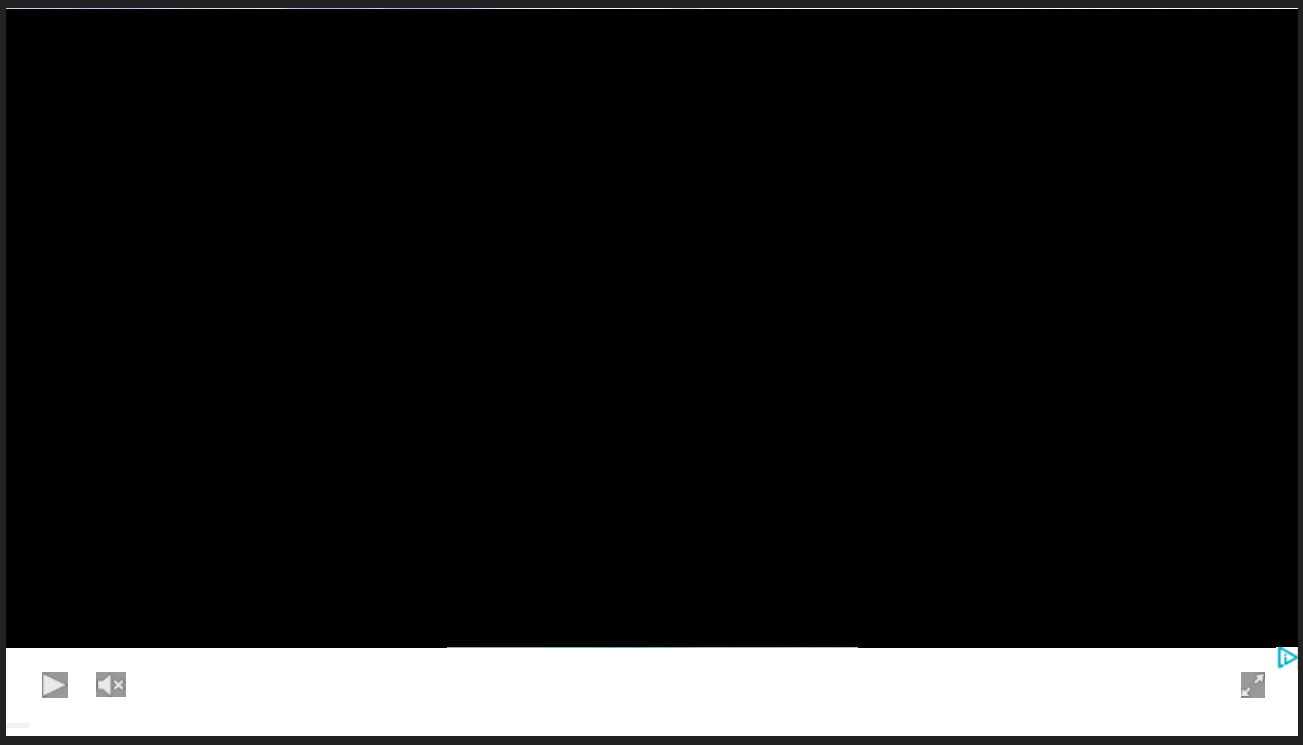
Just Stop Oil activists who sprayed Stonehenge with orange powder cleared of criminal damage

They cited human rights law in their defence

Rod Minchin
Friday 31 October 2025 17:12 GMT



Prosecutors release videos played in trial of Just Stop Oil activists accused of damaging Stonehenge

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Three Just Stop Oil activists who took part in a protest in which Stonehenge was sprayed with orange powder have been found not guilty of criminal damage and causing a public nuisance.

It follows a trial at Salisbury Crown Court where they cited human rights law in their defence.

Then-Oxford University student Niamh Lynch, 23, and Rajan Naidu, 74, had been accused of using two colour blasters filled with cornflour, talc and an orange dye to spray the monument.

Salisbury Crown Court was told the pair – along with a third activist, Luke Watson, 36 – targeted Stonehenge as part of an ongoing fossil fuel protest by the Just Stop Oil group the day before the 2024 summer solstice.

About 15,000 people were due to gather and celebrate at the monument.

Naidu and Lynch had crossed the boundary ropes and trespassed into the area around the monument before launching the attack.



Just Stop Oil protesters sit down after an orange substance was sprayed on Stonehenge *(PA Media)*

Watson had bought the equipment used in the attack and had driven his co-accused to Stonehenge that morning.

Prosecutors alleged the protest had been “carefully planned” and was filmed by other Just Stop Oil supporters with footage released publicly afterwards.

Simon Jones, prosecuting, said: “Putting it simply, we say they were all in it together.

“The prosecution say that this is an act of blatant and clear vandalism. The intention is undoubtedly to make a statement.”

After the attack, Naidu and Lynch, who were both wearing white Just Stop Oil T-shirts, sat down in silence in front of the stones until they were arrested.

The court heard the stones were promptly cleaned. The costs of removing the powder totalled £620.

Mr Jones added: “Stonehenge is arguably the best recognised and architecturally sophisticated prehistoric stone circle in the world, built around 5,000 years ago.

“The site in Wiltshire is visited by members of the public from all over the world, providing both an education and spiritual experience.

“The stones are a protected ancient monument.”





Judge Paul Dugdale told the jury in his legal directions they had to assess where the “balance lies” in the case and whether a conviction would be a “proportionate interference” with the defendants’ rights.

RECOMMENDED

- Footage shows moment Just Stop Oil protesters spray orange paint on Stonehenge, court hears
- Just Stop Oil to end disruptive protests with final demonstration date announced
- Two deny charges over Just Stop Oil protest at Stonehenge
- Two people charged by police after orange paint was thrown at Stonehenge in Just Stop Oil protest

“In any society there will be those whose opinions we agree with and those whose opinions we disagree,” he said.

“The essence of a free society and freedom of speech is that everyone’s entitled to express their opinion even when we disagree with what they say.

“If individuals disagree with what our government is doing on certain matters, they are entitled to protest about the government’s actions or inactions.

“All of this is the essence of our free society. It’s how our society has developed over the centuries, and the reality is we are very fortunate to live in a free society.

“There are times when protecting the right to freedom of speech and freedom to protest can mean that activity that would otherwise be unlawful would be regarded as lawful by the court to protect those rights.”

The jury found Naidu, of Gosford Street, Birmingham; Lynch, of Norfolk Road, Turvey, Bedford; and Watson, of The Street, Manuden, Essex, each not guilty of the two charges after deliberating for six hours.

More about: Stonehenge Just Stop Oil Salisbury Crown Court Human rights law Activists

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Three Just Stop Oil supporters walk free after trial for M25 gantry action

Court & Prison, Press / September 11, 2025

Three Just Stop Oil supporters were found not guilty of public nuisance at Guildford Crown Court today, after peacefully climbing gantries on the M25 in 2022, to demand an end to new fossil fuel projects.[1]

Sam Holland, Rachel Payne and Isabel Rock took action on the M25 on 9th November 2022. They were

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During the trial the prosecution emphasised that this was a planned and coordinated action that resulted in significant delays to the travelling public, that all three defendants were trespassing in a place that was forbidden to the public and that they had taken considerable risks with public safety. Giving evidence National Highways Ltd claimed that traffic was delayed by between 4 and 5 hours and that between 9,000 and 30,000 vehicles were impacted. None of the defendants denied the indictment, but they argued that they had a reasonable excuse for their actions.

Sam Holland argued that he had wanted to prevent harm. He had read academic papers which pointed to catastrophic consequences for humanity from burning fossil fuels, including food system collapse.

Rachel Payne explained that she took action because she was fearful for her children and grandchildren about government inaction on the climate crisis. She highlighted the government breaking its 2015 climate agreements by offering new fossil fuel licences.

Isabel Rock said that she felt a duty to look after people younger than herself and that the climate crisis is going to touch every single part of their lives. Taking action was something she weighed up very seriously and that as a self employed person, she knew how hard it was for people to earn money and to get by. However she felt that if they could see some of these agreed facts about the seriousness of the climate crisis, she hoped they would understand.

The Judge, Recorder L Harris, ruled that it was for the jury to decide whether or not the supporters had a reasonable excuse for their actions.

In their closing speeches, all the defendants were able to refer to the agreed facts in the case, which included several key facts relating to the climate crisis.

In his closing speech, Sam Holland said:

"We brought evidence on the largest evil committed in human history: the continued drilling and burning of oil and gas in full knowledge that large parts of humanity will be killed. The prosecution has said that these are beliefs. They are not beliefs. This is not a cause. This is not another 'issue'. This is billions of deaths. Not according to me, according to the world's leading scientists. These are the facts. If we hit 3C of warming by 2050, there could be four billion human deaths. Half of the world's current population.

"What was the UK government doing? It was issuing over 100 new licences for companies to explore and drill oil and gas in the North Sea. In the knowledge of everything I've just said, which is public knowledge and has been known for decades, the government was still wanting to drill. Unimaginable evil. We all talked about how we had extensively tried other methods for making change. Signing petitions, emailing MPs, going on conventional marches... So we had to turn to disruptive action.'

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"I thank the members of the Jury deeply for their 'common sense' verdict — they were actually permitted to hear the several climate related agreed facts, which were read out to them, about the severe threats the present emergency poses to our world and they listened!

I thank the prosecution for agreeing to those facts following earlier trials I attended in which the 'whole truth' was repeatedly denied to the Jury. I thank the Judge for allowing them to decide that we "more likely than not" had a reasonable excuse for what we did.

In my statement to the police, I urgently expressed my fears for my family and world and my hopes for an 'eco-U- turn'. With this acquittal, I feel this may be closer to being made possible. The tide may well be turning if the agreed facts on climate, allowed in this trial, can become widely known and acted upon internationally."

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.

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: https://juststopoil.org/press-media

Heathrow 10 images here:
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Morning Star for Peace and Socialism

Britain / 29 August 2025

Eight JSO supporters acquitted of public nuisance after petrol station action



JSO activists blocking a service station on the M25 in August 2022. Photo: Just Stop Oil

EIGHT Just Stop Oil activists have been cleared of causing a public nuisance after disrupting Britain's largest petrol station.

Michael Davies, Charles Laurie, Phoebe Frewer, Sophie Sharples, Tez Burns, Peter Lay, Gareth Harper and Emma Ireland took action at Cobham motorway services in Surrey in August 2022.

As part of a wider campaign targeting petrol stations along the M25, the activists were among a group of 35 who also took action at Clacket Lane services in Kent and Thurrock services in Essex.

At Guildford Crown Court on Wednesday, all eight defendants were found not guilty of intentionally or recklessly causing a public nuisance by blocking the entrance to Cobham services.

However, Mx Burns and Mr Lay were found guilty of causing criminal damage, while Mr Laurie was found guilty of possession of a hammer with intent to damage property after two petrol pumps were damaged.

Following the verdict, Ms Ireland said: "I am grateful to the judge and the prosecution for allowing the agreed facts on the climate crisis to have played a part in this trial and for allowing us to speak to our motivations without fear of being found in contempt of court.

"The prosecution spoke about common sense and I was reminded that, in 2022, I felt that common sense would have been for the Conservative government to stop issuing new oil and gas licences, to show a commitment to reducing carbon emissions and, in turn, to offer some protection to humanity from the gravest predictions of climate collapse."



Elizabeth Short

Morning Star for Peace and Socialism

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Hung jury in latest Just Stop Oil gantry case

Court & Prison, Press / July 21, 2025

A Just Stop Oil supporter faces retrial after a jury was unable to reach a verdict in relation to her participation in the M25 gantry climbing actions in November 2022 demanding an end to new oil and gas licencing. [1]

A 12-member jury at Southwark Crown Court was unable to reach a verdict in the case of a Just Stop Oil supporter charged with the new statutory offence of 'causing a public nuisance' under the Police, Crime, Sentencing and Courts Act 2022, following more than 9 hours of deliberations over three days.

Theresa Norton, 66, a former councillor and carer, took part in a Just Stop Oil action on the M25 in November 2022, during which she climbed a gantry near junction 1b on 7 November, to demand an end to all new oil and gas projects – a demand that has since been adopted as official government policy. She did

The CPS has now been allowed 7 days by Judge Tomlinson to determine whether it will pursue a retrial.

In her evidence to the Jury, Norton said:

"I acted on my conscience. My despair turned into action into hope. Sadly, conscience is not a legal defence. Therefore, you'll be directed to ignore this evidence, all that I've said, and come to your verdict only on the evidence as presented by the prosecution. This leaves you with no choice, no agency, you have become part of the machinery of state. Accepting of the cognitive dissonance that can happily see a government declare such statements as seen in the Agreed Facts, whilst simultaneously issuing 130 new oil and gas licences, planning for extra runways at airports, building more roads, refusing to implement plans to insulate our badly designed cold and draughty homes, continuing with subsidies to fossil fuel companies to the tune of millions of pounds a week and delaying investment for sustainable green energy, because the fossil fuel lobby is powerful and generous with donations to influential think tanks.

The climate crisis was only getting worse in 2021. Talks by eminent climate scientists were telling us to act, do something. In 2022, a third of Pakistan was under flood water- 1700 dead, 13,000 injured, 8 million displaced. Portugal, Germany and France had rampant wildfires. In July there were wildfires in UK and 40 degrees in London for the first time. London Fire Brigade had its busiest day since WW2.

Civil resistance is a communicative act. It communicates that something is very wrong and needs to change. It is not trying to seize power in a violent armed revolution. It is nonviolent and peaceful. Facts, information and science do not motivate people to change. Tell a smoker that smoking kills and they'll carry on. Facts are not what powers the human heart. That's why just talking about science will not save us and quoting all the statistics in the world will not move us to change. You have to bring emotions into it. Nonviolent direct action has a history of effecting change. We've been vindicated. That oil and gas will stay in the sea. But I stand here because I maintain the courage of my convictions. I believe that when we see clearly through that state machinery, it is only our collective conscience that can truly be relied upon."

During the trial, the Crown prosecution acknowledged the findings of the 2020 Net Zero Interim report, which stated:

"Climate change is an existential threat to humanity. Without global action to limit greenhouse gas emissions, the climate will change catastrophically with almost unimaginable consequences for societies across the world." [3]

Additionally, the prosecution agreed upon the established scientific consensus that warming exceeding 1.5 degrees Celsius above pre-industrial levels poses 'catastrophic' and 'irreversible' risks to humanity. It was further accepted that the average global temperature rise for the year ending 2024 was 1.65 degrees Celsius, with projections indicating that warming would permanently surpass 1.5 degrees Celsius before 2030.

Just Stop Oil continues to stand by those prosecuted for peaceful resistance against fossil fuel expansion in the face of rapidly accelerating climate collapse.

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: https://juststopoil.org/press-media

Website: https://juststopoil.org/

Facebook: https://www.facebook.com/JustStopOil/

Instagram: https://www.instagram.com/just.stopoil/

Twitter: https://twitter.com/JustStop_Oil

Youtube: https://juststopoil.org/youtube

TikTok: https://www.tiktok.com/@juststopoil

Notes to Editors

[1] Just Stop Oil is a member of the A22 Network of civil resistance projects.

April 26th 2025 was the last Just Stop Oil action, but our supporters will continue to tell the truth in the courts, speak out for our political prisoners, and call out the UK's oppressive anti-protest laws.

Just Stop Oil continues to rely on small donations from the public to make this happen.

[2] https://juststopoil.org/2023/10/30/no-prison-for-m25-injunction-breakers/

[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004025/210615_NZR_interim_report_Master_v4.pdf

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Palestine Action

This article is more than **4 months old**

Palestine Action activists cleared of aggravated burglary at Israeli defence firm site

None of the six activists were convicted of any offence over break-in at Elbit Systems factory near Bristol in 2024

Haroon Siddique *Legal affairs correspondent*

Wed 4 Feb 2026 13.54 GMT

Prefer the Guardian on Google

Six Palestine Action activists have been cleared of committing aggravated burglary over a break-in at an Israeli defence firm's UK site.

Charlotte Head, Samuel Corner, Leona Kamio, Fatema Rajwani, Zoe Rogers and Jordan Devlin were accused of threatening unlawful violence and using sledgehammers as weapons after a prison van was driven into Elbit Systems' factory in Filton, near Bristol, on 6 August 2024.

But after a trial at Woolwich crown court, south London, none were convicted of any offence.

All six were acquitted of aggravated burglary, which carries a maximum sentence of life imprisonment, and jurors found Rajwani, Rogers and Devlin not guilty of violent disorder.

The jury deliberated for 36 hours and 34 minutes but could not reach verdicts for charges of criminal damage against any of the six defendants. This was in spite of all of the defendants, except Devlin, telling jurors they had entered the factory without permission and damaged Elbit's equipment including computers and drones.

Additionally, no verdict was reached in the allegation that Corner, 23, inflicted grievous bodily harm on police sergeant Kate Evans, or on the charges of violent disorder against Head, Corner and Kamio.

Before the verdicts on Wednesday, Mr Justice Johnson told the jurors he was not going to ask them to deliberate further, because "you believe that you can go no further than you have got to already".

The activists hugged one another in the dock as a dozen of their supporters cheered from the public gallery above.

Deanna Heer KC, prosecuting, had told the jury that the defendants were all armed with sledgehammers, which she said were not only intended to be used to damage property but also as weapons "to be used if necessary to threaten and damage people".

Heer alleged security guards were sworn at, had sledgehammers swung at them and were whipped, while one was sprayed with a foam fire extinguisher.

Rajiv Menon KC, representing Head, said any violence by the defendants was clearly unplanned, that the defendants had not expected security guards to enter the factory and were "completely out of their depth".

He compared Head to the suffragettes, while describing Elbit Systems, of which Elbit Systems UK is a subsidiary, as a "dreadful company [that] has played a critical role in the killing of tens of thousands of Palestinians".

The defence also argued that the security team had used excessive force and pointed to missing CCTV footage.

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During the trial one juror asked the judge whether it would count as a lawful excuse if a defendant believed they were performing a life-saving action by destroying weapons used to kill civilians in an illegal genocide. Johnson said it would not, but Menon reminded the jurors of their absolute right to acquit.

Heer and Johnson both told the jurors, before they began deliberating, that they should disregard their views on the conflict in the Middle East.

After the verdicts, Rogers' mother, Clare, said: "Our loved one's action against Elbit Systems and the state's brutal response have exposed the true values of the government. The government is determined to do business with Israel and protect its weapons industry at any cost.

"Our loved ones dared to poke this beast - and no expense has been spared in policing, prosecuting and imprisoning them without trial. Imagine if the government had put the same amount of money, resources and political will into preventing a genocide."

A spokesperson for Defend Our Juries, which has organised rallies opposing the ban on Palestine Action, which took effect on 5 July last year, said the verdicts were "a huge blow to government ministers" who had "tried to portray Palestine Action as a violent group to justify banning it under badly drafted terrorism legislation".

Amnesty International also said it showed how disproportionate the proscription decision was.

More on this story

Palestine Action trial lawyer wins appeal against contempt of court charge

12 May 2026



Palestine Action ban created 'culture of fear', UK appeal court hears

28 Apr 2026



Greta Thunberg, Sally Rooney and Brian Eno defy Palestine Action ban in letter to judges

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Palestine Action activist who hit officer with sledgehammer 'panicked', court told

22 Apr 2026



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Most viewed

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

AJW23

This is the exhibit marked "AJW23" in the witness statement of Alexander James Wright.

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.

N244

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 **The High Court of Justice** **King's Bench Division**	**Claim no.** **KB-2024-002473**
Fee account no. (if applicable) **PBA0087211**	**Help with Fees – Ref. no.** (if applicable) H W F - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Birmingham Airport Limited and others	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	18 June 2026 18 Jun 2026

HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION

KB-2024-002473

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

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?
   The Claimants seek permission, pursuant to CPR 17.1, to amend the Amended Claim Form and Amended Particulars of Claim in the form accompanying this application, so as to amend the definition of the Defendants (Persons Unknown).

   The Claimants ask that this application be considered and heard at the second annual review of the injunctions granted pursuant to the order of Jacobs J dated 6 August 2024, which has been listed to take place on 30 June 2026 (together with the second annual review of the injunctions granted in actions KB-2024-002132, KB-2024-002317 and KB-2024-001765).

   The Claimants will file a draft form of order ahead of such hearing, which will provide for this application.

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: 30 June 2026 (second annual review hearing)

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

9. Who should be served with this application?	Defendants (Persons Unknown)
9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.	The Claimants will arrange for service on the Defendants (Persons Unknown)

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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.

We refer to the witness statement of Alexander James Wright dated 11 June 2026 which has previously been filed with the Court in these proceedings.

The Claimants apply for permission to amend the Amended Claim Form and Amended Particulars of Claim in the form enclosed with this application so as to amend the definition of the Defendants (Persons Unknown) in the light of the evidence contained within such witness statement - which the Claimants respectfully submit should be reflected in the statements of case and the definition of the Defendants (Persons Unknown).

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
18	June	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

+44 750 057 8620

Fax phone number

DX number

Your Ref.

292659.000057/WRIGHTAX

Email

alexwright@eversheds-sutherland.com

Amended Pursuant to CPR 17.1(1)

Draft Re-Amended Claim Form

Claim Form

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 – –

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.

For court use only	
Claim no.	KB-2024-002473
Issue date	31 July 2024

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

(1) BIRMINGHAM AIRPORT LIMITED of Diamond House, Birmingham Airport, Birmingham, West Midlands, B26 3QJ
(2) LIVERPOOL AIRPORT LIMITED of Venus Building 1 Old Park Lane, Traffordcity, Manchester M41 7HA
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED of Venus Building 1 Old Park Lane, Traffordcity, Manchester M41 7HA
(4) BRISTOL AIRPORT LIMITED of Lulsgate House, Bristol Airport, Bristol BS48 3DW
(5) SOUTH WEST AIRPORTS LIMITED of Lulsgate House, Bristol Airport, Bristol BS48 3DW
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED of Lulsgate House, Bristol Airport, Bristol BS48 3DW

HIGH COURT OF JUSTICE SEAL 06 Aug 2024 QUEEN'S BENCH DIVISION
KB-2024-002473

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

Please refer to Schedule 1 attached to the Claim Form

Brief details of claim

The Claimants seek an injunction to restrain the Defendants from acts of trespass and/or private and/or public nuisance on the land edged red on Plan 1, Plan 2 and Plan 3.

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.

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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

- [x] 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
31	0 7	2 0 2 4

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.

AllyboM/362291.1

Email

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

Re-Amended Schedule 1 to Claim Form

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

Amended pursuant to CPR 17.1(1)

Re-amended pursuant to the order of [ ] dated [ ]

CLAIM NO: KB – 2024 -002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

Defendants

[DRAFT] RE-AMENDED PARTICULARS OF CLAIM

Birmingham Airport

1. The First Claimant is the operator of Birmingham Airport, located in Airport Way, Birmingham B26 3QJ, shown edged in red on Plan 1 ("**BHX**"). BHX serves around 11.8 million travelling passengers each year with an annual revenue of approximately £152 million.

2. With the exception of the parcels of land referred to in paragraph 9, the First Claimant is the registered proprietor of all of the land on which BHX is situated as shown in red on Plan 1, through the interests shown in the Title Schedule and on Plan 1A attached hereto - but subject to the interests referred to in paragraph 4.

3. Subject to the aforesaid interests, the First Claimant is entitled to an immediate right of possession occupation and control of BHX by virtue of its titles as shown in the Title Schedule and on Plan 1A.

4. Plan 1B identifies the areas within BHX over which the First Claimant lacks (or does not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests ("**the BHX Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First Claimant does not assert that it is the person with an immediate right of occupation or possession.

5. The BHX Third Party Areas are coloured blue and green on Plan 1B. The blue colouring indicates areas within BHX which are the subject of leases. The green colouring indicates parts of BHX which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

6. There are five areas coloured blue on Plan 1B (numbered 1-5) each of which directly abuts the red line boundary of BHX. In each of those locations, the boundary of BHX is not in the possession or control of the First Claimant.

7. With those exceptions, access to or from the BHX Third Party Areas by the public from outside the airport, necessarily involves the use of areas of BHX which remain unencumbered by any such arrangement and in relation to which, accordingly, the First Claimant remains entitled to possession occupation and control by virtue of their interests shown in the Title Schedule and on Plan 1A.

8. Within the BHX red line boundary, there are 3 parcels in respect of which the First Claimant is not the registered proprietor:-

   a. although the land on which the northern landing lights (coloured orange on Plan 1B) are situated is registered in the name of a third party company, the First Claimant asserts that it is entitled to the immediate right of occupation or possession of those lights and the structure which supports them. Some of the lights and some parts of the structure have been in place since around 1967 and others since 2008. All of the lights and structures have been maintained by the First Claimant or its predecessors throughout that period;

   b. on the south western boundary is an unregistered strip of land (coloured bright green on Plan 1A but omitted from the key on that plan) in respect of which the First Claimant asserts that it is entitled to the immediate right of occupation or possession; and

   c. on the eastern boundary is an Air Rail Link and an associated platform and station. By an agreement for lease dated 1 April 2013, Network Rail Infrastructure Limited agreed to grant and the First Claimant (then known as Birmingham International Airport Limited) agreed to take a lease of the land coloured purple on Plan 1B for a term of 199 years. The lease has not been completed but the First Claimant asserts that it is entitled to the immediate right of occupation or possession of the land coloured purple.

9. By virtue of s 63 of the Airports Act 19~~9~~86, the First Claimant has power to make byelaws with respect to BHX. Pursuant to the Birmingham Airport Limited Byelaws 2021, byelaw 3.32, no person has a right to use any part of BHX as defined therein for demonstrations or public assemble which is likely to obstruct or interfere with the proper use of the airport or the safety or security of passengers or persons using the airport. The plan which defines BHX for the purposes of the byelaws does not extend to the landing lights. Apart from that, it includes all the land edged in red on Plan 1.

Liverpool Airport

10. The Second Claimant is the operator of Liverpool Airport, located in Speke Hall Avenue, Speke, Liverpool L24 1YD, shown edged in red on Plan 2 ("**LJLA**"). LJLA serves around 5 million travelling passengers each year with an annual revenue of approximately £35 million.

11. The Second Claimant is the proprietor of the land on which LJLA is situated as shown in red on Plan 2, through the interests shown in the Title Schedule and Plan 2A attached hereto - but subject to the interests referred to in paragraph 14.

12. The Third Claimant has been joined to the proceedings as it is the registered proprietor of the land on which the western landing lights (coloured brown on Plan 2B) are situated, which is registered under Title Number MS575438.

13. Subject to the aforesaid interests, the Second Claimant (and the Third Claimant in respect of the western landing lights) is entitled to an immediate right of possession occupation and control of LJLA, by virtue of its titles as shown in the Title Schedule and Plan 2A.

14. Plan 2B identifies the areas within LJLA over which the Second Claimant lacks (or does not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the LJLA Third Party Areas**") or public rights of way ("**the LJLA Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Second Claimant does not assert that it is the person with an immediate right of occupation or possession.

15. The LJLA Third Party Areas are coloured blue and green on Plan 2B. The blue colouring indicates areas within LJLA which are the subject of leases. The green colouring indicates parts of LJLA which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

16. The LJLA Highways are indicated in pink on Plan 2B. These provide access to LJLA to the Second Claimant and its licensees (including members of the public).

17. Access to or from the LJLA Third Party Areas by the public from outside the airport, necessarily involves the use of areas of LJLA which remain unencumbered by any such arrangement and in relation to which, accordingly, the Second Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule and on Plan 2A.

18. All except 2 of the eastern landing lights (coloured orange on Plan 2B) are situated on title numbers CH596568 and CH384543 in respect of which the Second Claimant is the registered proprietor. The Second Claimant asserts that it is entitled to the immediate right of occupation or possession of the other 2 landing lights and the

structure which supports them which are situated on unregistered land. The lights and the structure which supports them have been in this location since around 1960 and they have been maintained by the Second Claimant or its predecessors throughout that period.

19. By virtue of s 63 of the Airports Act 19~~9~~86, the Second Claimant has power to make byelaws with respect to LJLA. Pursuant to the Liverpool John Lennon Airport Byelaws 2022, byelaw 2.18, no person has a right to use any part of LJLA for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the landing lights, the plan which defines LJLA for the purposes of the byelaws includes all of the land edged in red on Plan 2.

Bristol Airport

20. The Fourth Claimant is the operator of Bristol Airport, located in Bristol BS48 3DY, shown edged in red on Plan 3 ("**BRS**"). BRS serves around 10 million travelling passengers each year with an annual revenue of approximately £179 million.

21. The Fourth, Fifth and Sixth Claimants are the proprietors of the land on which BRS is situated as shown in red on Plan 3, through the interests shown in the Title Schedule and Plan 3A hereto - but subject to the interests referred to in paragraph 23.

22. Subject to the aforesaid interests, the Fourth, Fifth and Sixth Claimants are entitled to an immediate right of possession occupation and control of BRS, by virtue of its titles as shown in the Title Schedule and Plan 3A.

23. Plan 3B identifies the areas within BRS over which the Fourth, Fifth and Sixth Claimants lack (or do not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the BRS Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fourth, Fifth and Sixth Claimants do not assert that they are the person with an immediate right of occupation or possession.

24. The BRS Third Party Areas are coloured blue and green on Plan 3B. The blue colouring indicates areas within BRS which are the subject of leases. The green colouring indicates parts of BRS which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

25. Access to or from the BRS Third Party Areas by the public from outside the airport, necessarily involves the use of areas of BRS which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fourth, Fifth and Sixth Claimants remain entitled to possession occupation and control by virtue of its interests shown in the Title Schedule and on Plan 3A.

26. Although the land on which the western landing lights (coloured brown on Plan 3B) are situated is registered in the name of a third party individual, the Fourth Claimant asserts that it is entitled to the immediate right of occupation or possession of those lights and the structure which supports them. The lights and structure have been in place since around 2004 and have been maintained by the Fourth Claimant or its predecessors throughout that period.

27. By virtue of s63 of the Airports Act 1998, the Fourth Claimant has power to make byelaws with respect to BRS. Pursuant to the Bristol Airport Byelaws 2012, byelaw 4.17, no person has a right to organise or take part in any protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the landing lights, the plan which defines BRS for the purposes of the byelaws includes all the land outlined in red on Plan 3.

The Claimants' claims

28. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management / airline facilities and (in the case of BHX) the Air Rail Link railway.

29. In relation to each airport:

    a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).

    b. No wider consent subsists; and (subject to the highways described above) no public right of access, or way, subsists over the airports.

c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.

d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

30. In relation to the Third Party Areas at each airport:

a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the Court to make an order which does not distinguish between the airports generally (as shown outlined in red on the various plans) and the Third Party Areas within them; and

b. Further or alternatively, protest which occurs on the Third Party Areas interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.

a. The like considerations apply in in relation to those of the landing lights not in the outright possession of the Claimants.

31. Further, in respect of the LJLA Highways described above: protest which occurs on these highways interferes and/or threatens to interfere:

b. Unreasonably and substantially, with the Second and Third Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;

c. Unreasonably and substantially, with (and/or to obstruct or hinder) the free passage along the highway, occasioning particular damage to the Second and Third Claimants; and

d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the byelaws.

The threats

32. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:

33. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations…"

34. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").

35. 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.

36. Since that 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?"

37. 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?"

38. 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***.

…"

39. 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.

[1] As of 29 July 2024, £24,519 had been raised on this website.

PICTURE OF AIRPORT ACTIONS SYMBOLISING INTERNATIONAL COMMUNITY (https://us02web.zoom.us/meeting/register/tZIoduqpqTMtE9dgMMhlaymvEZgO45jgJ19A)

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,

Just Stop Oil"

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

41. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at London Stansted Airport (in an area which is subject to an occupational arrangement with a third party), as part of a series of protests on climate change. This included:

    a. an individual using an angle grinder to cut a hole in the perimeter fence of the airport;

    b. two individuals trespassing the perimeter fence; and

    c. spray painting two aircrafts orange using a fire extinguisher.

42. As a result of this direct action:

    a. It was necessary to suspend operations on the runway at Stansted Airport for approximately 50 minutes.

    b. the two individuals (known as Jenifer Kowalski and Cole Macdonald) were arrested and charged with causing criminal damage, aggravated trespass and interference with the use or operation of national infrastructure.

43. On 25 June 2024, six JSO activists were arrested at Gatwick Airport and were found to be carrying luggage containing a large number of bandages thought to have been intended to interfere with jet engines or to block lavatories.

44. On 27 June 2024, six JSO activists were arrested by the Metropolitan Police whilst attending an event organised by JSO.

45. On 29 June 2024, JSO sent an email to subscribers in the following terms:-

> "***Since Tuesday, 31 supporters of Just Stop Oil have now been arrested*** *for possessing the strong convictions that governments and corporations do not have the right to prioritise oil profits over the safety and wellbeing of our loved-ones, communities and the many millions already suffering the effects of runaway climate breakdown.*
>
> *In a sane society, it would be those who are setting the stage for an end to ordered society that would be having their doors barged down and dragged into the back of a police van to be interrogated about the catastrophic criminal damages they are imposing on every living thing and on every future generation. Instead, it is ordinary people- mothers, grandparents and young people who are having their futures stolen from them, that the police come for.*
>
> ***The incoherent pattern of arrests we have seen over the last 24 hours suggests a rattled system****. They know that as climate breakdown intensifies, civil unrest will increase and one day there will not be enough police to cope with the millions stepping into action, as the full betrayal of the political establishment becomes clearer.*
>
> ***We will not be intimidated by the death throes of a broken system****. Nothing the state can throw at us is worse than the realities that will be imposed on all of us if the breakdown of our climate carries on unabated. We WILL be stepping into action in the summer because when the lives of your family are at risk, there is no other choice than to protect them…*"

46. On 24 July 2024, a further ten JSO activists were arrested at Heathrow Airport following an intelligence led operation. According to media reports, some of those arrested were found to be carrying cutting gear and glue.

47. On 28 July 2024, a further eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with national infrastructure.

48. On 29 July 2024, a further two JSO activists were arrested at Heathrow Airport after spraying orange paint around the entrance hall to Terminal 5.

49. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for BHX, LJLA and/or BRS:

    c. trespass on the airports and/or

    d. by protest conducted on or from the Third Party Areas and/or on or from the land on which the landing lights (which are not within the Byelaw plans) are situate, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or

e. by protest conducted on or from the highways, obstruct those occasioning particular damage to the Claimants and/or interfere with the Claimants' right of access to the airports via those highways, so as to cause a nuisance actionable by the Claimants.

50. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.

51. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:

52. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.

53. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive - by which point harm may already have occurred.

54. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.

55. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.

56. The airports in the present case are all the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the

Claimants are fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the Byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at Stansted Airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.

57. Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.

58. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND THE FIRST CLAIMANT CLAIMS AGAINST THE FIRST DEFENDANT:

(1) Subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months or such other period as the Court may determine, an order that the First Defendants must not, without the consent of the First Claimant enter, occupy or remain upon the land outlined in red on Plan 1.

AND THE SECOND AND THIRD CLAIMANTS CLAIM AS AGAINST THE SECOND DEFENDANT:

(2) Subject to periodic review by the Court on application by the Second and Third Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent

of the Second and Third Claimant, enter, occupy or remain upon the land outlined in red on Plan 2.

AND THE FOURTH, FIFTH AND SIXTH CLAIMANTS CLAIM AGAINST THE THIRD DEFENDANT:

(3) Subject to periodic review by the Court on application by the Fourth, Fifth and Sixth Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Third Defendants must not, without the consent of the Fourth, Fifth and Sixth Claimants (or either of them), enter, occupy or remain upon the land outlined in red on Plan 3.

STATEMENT OF TRUTH

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

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

_____

~~Stuart Sherbrooke Wortley~~

~~Partner~~

Eversheds Sutherland (International) LLP

Dated: ~~31 July 2024~~

Claim no: KB-2024-001765

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR/S JUSTICE [ ]

ON: 30 June 2026

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 OR THE TAKE BACK POWER CAMPAIGN OR OTHER WEATH 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 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 review of the Knowles J Order on 24 June 2025 by Mr Justice Bourne and the order of 24 June 2025 ("**the Bourne J Order**")

AND UPON the Claimants' application dated 2 June 2026

AND UPON the Claimants' application dated 18 June 2026 to re-amend the claim form and amend the particulars of claim

AND UPON the review hearings in each of the following claims having been listed on 30 June 2026 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 by the Bourne J Order (and subject to review, as provided for in paragraph 3 of the Knowles J Order).

2. The Knowles J Order, as varied by the Bourne J Order, shall be varied in the form set out in the schedule to this Order.

3. The Claimants have permission to re-amend the claim form and amend the particulars of claim to amend the description of the Defendants and otherwise in the form annexed to the application notice dated 18 June 2026.

4. 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.

SCHEDULE

Varied pursuant to the order of Bourne J dated 24 June 2025
Further varied pursuant to the order [ ] dated 30 June 2026

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

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 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

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~~

Alexander Wright

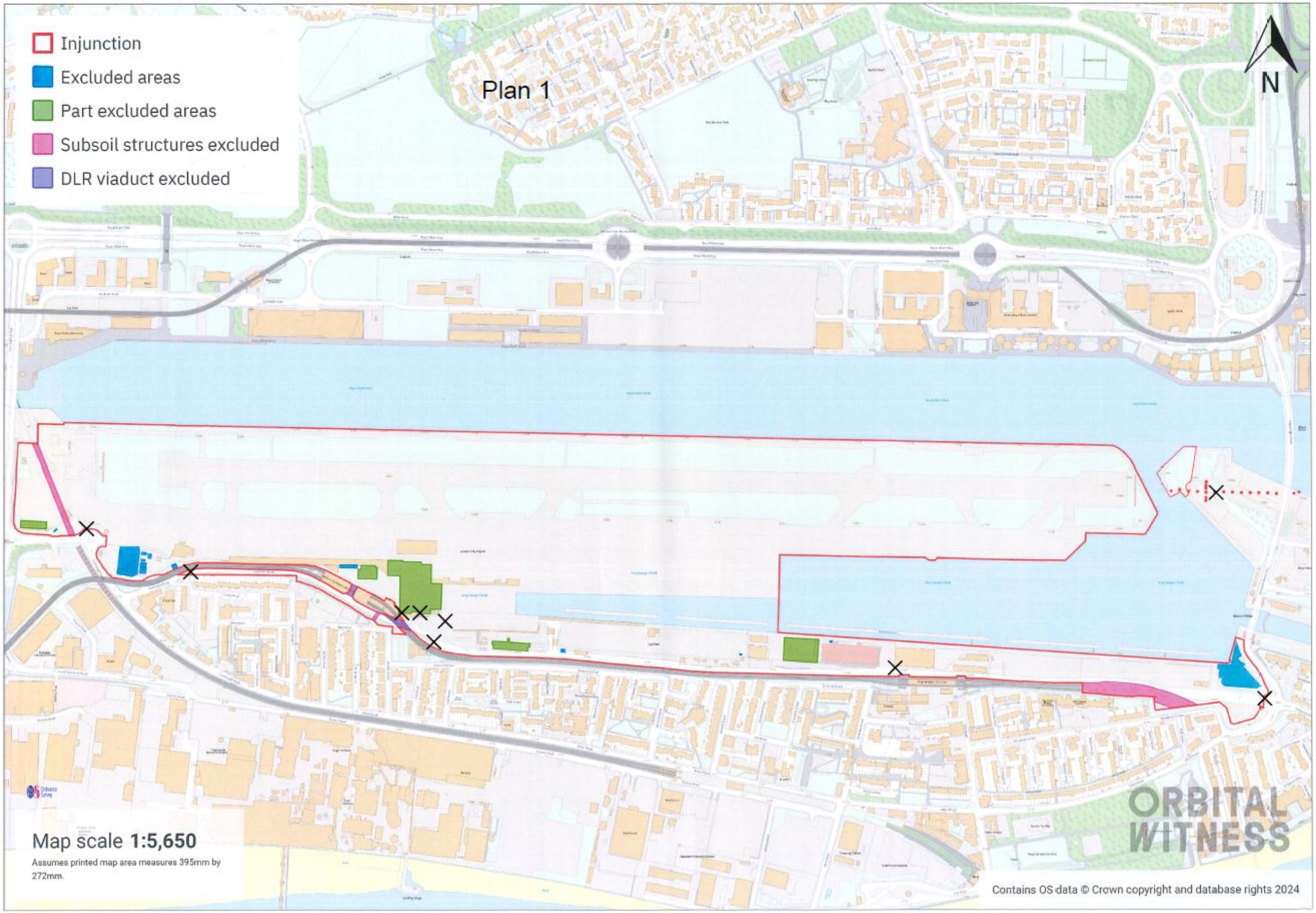
Eversheds Sutherland (International) LLP

alex.wright@eversheds-sutherland.com

07500 578620

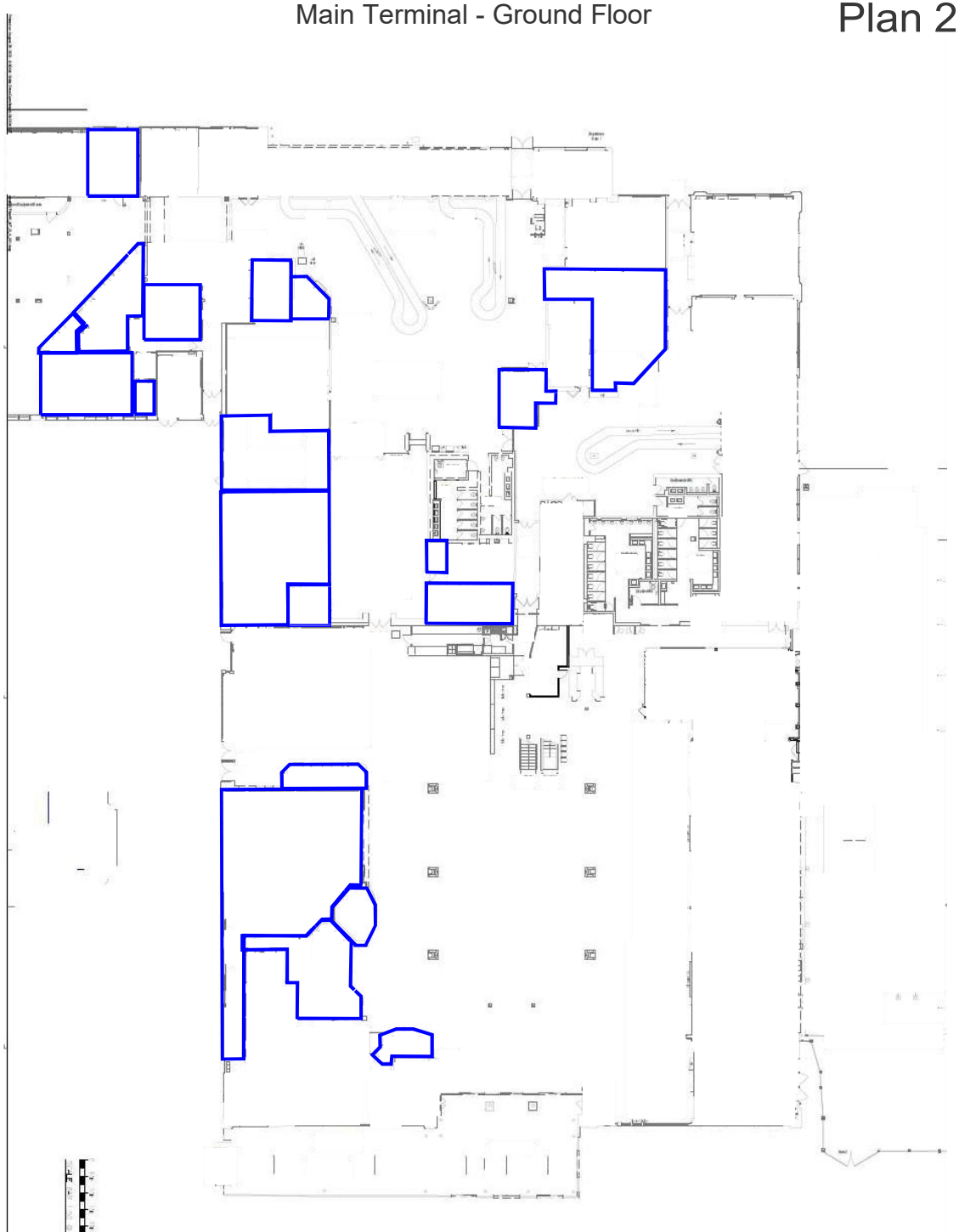
Dated: 20 June 2024

SCHEDULE 1 – PLANS


Injunction
Excluded areas
Part excluded areas
Subsoil structures excluded
DLR viaduct excluded
Plan 1
N
Map scale 1:5,650
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

Main Terminal - Ground Floor

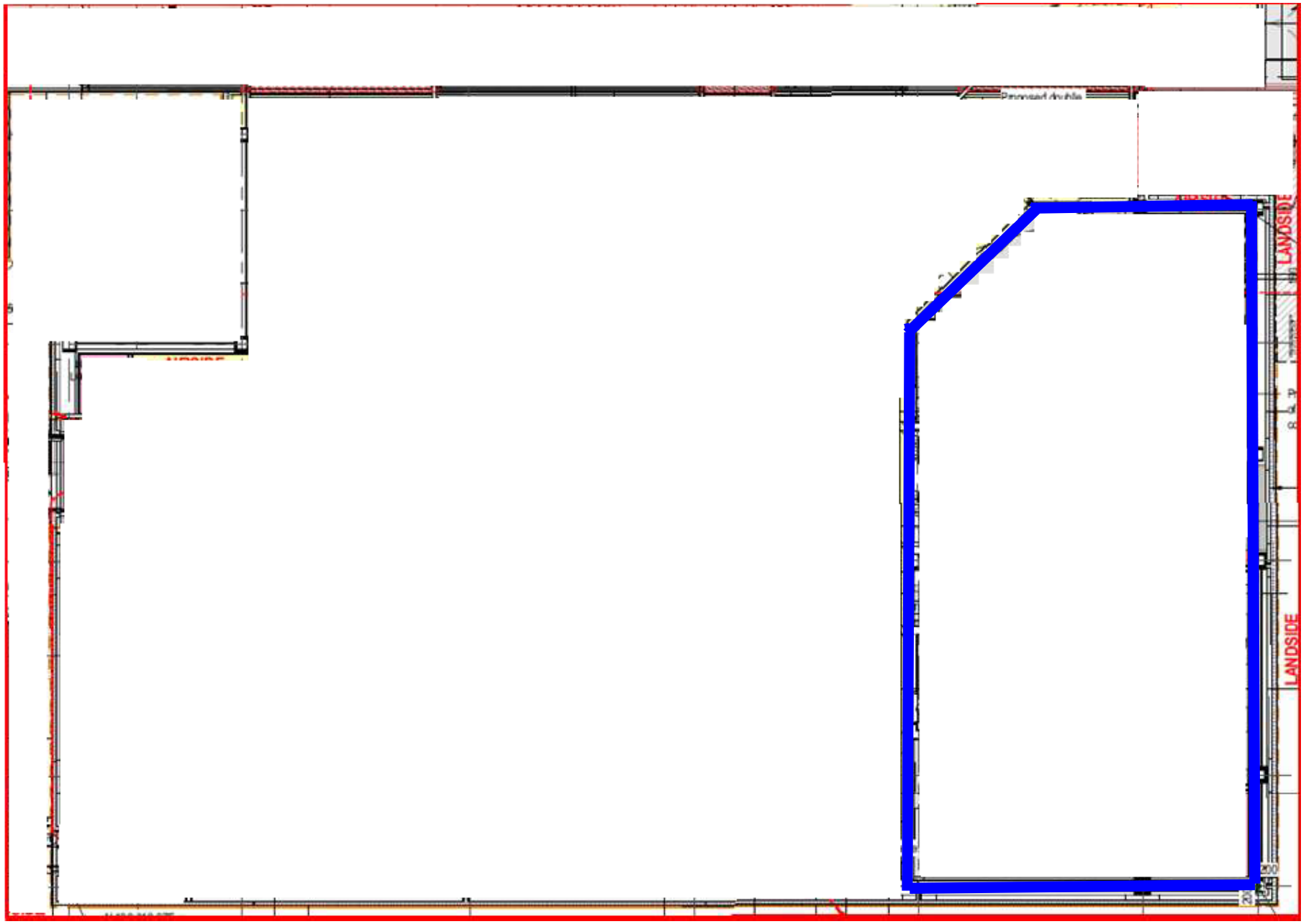
Plan 2



2017

Terminal Immigration Facilities - Ground Floor

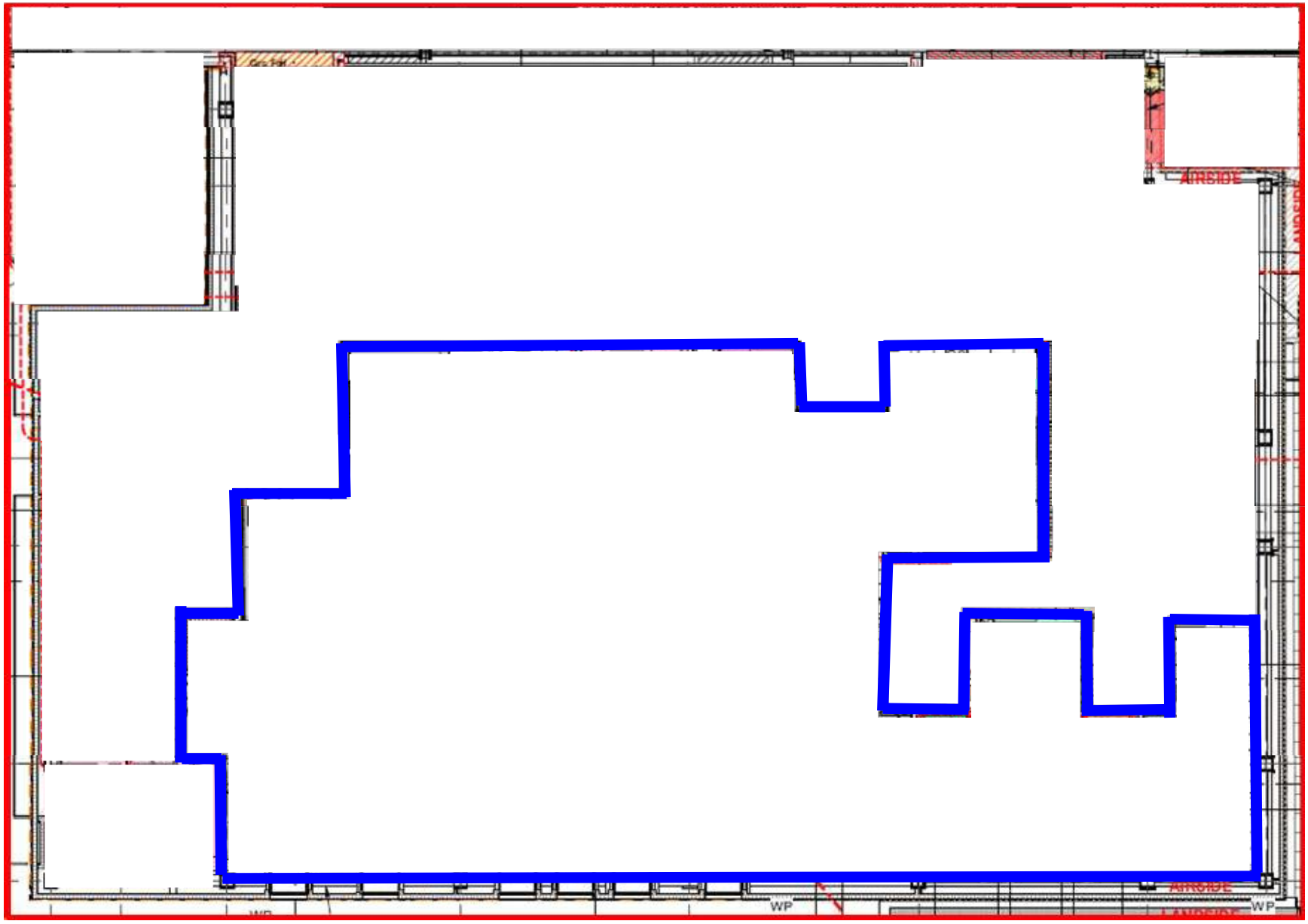
Plan 3



2018

Terminal Immigration Facilities - First Floor

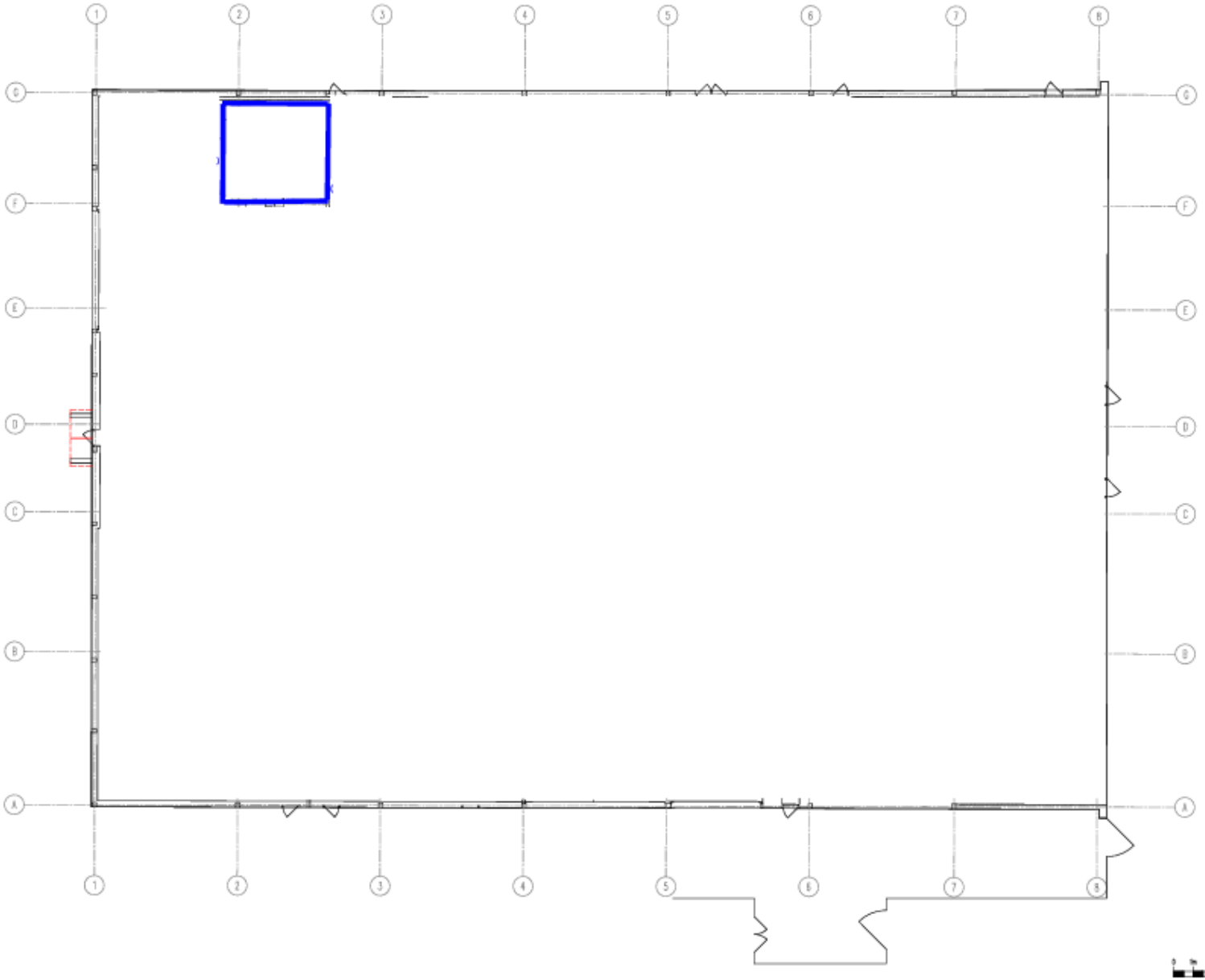
Plan 4



2019

Blue Shed - Ground Floor

Plan 5

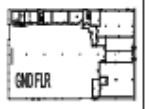


SCALE BAR 1:100 @ A1

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:



RECORD DRAWING

BLUE SHED

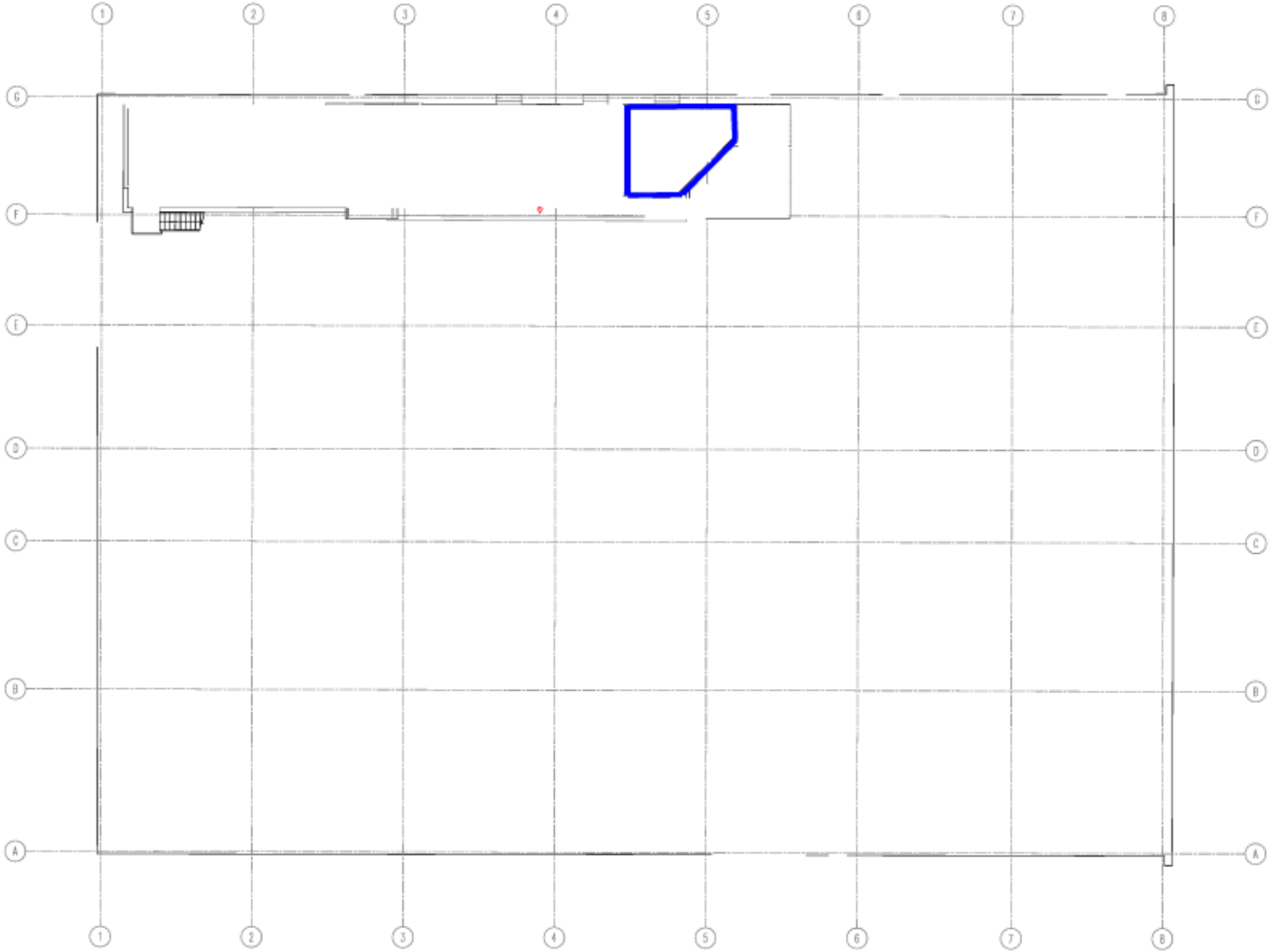
Ground Floor
General Arrangement Plan

R/BS/G/A/001

2020

Blue Shed - First Floor

Plan 6



SCALE BAR 1:100 @ A1

DO NOT SCALE - IF IN DOUBT ASK
Associated Drawings

General Notes:

LEGEND
FIRE DOOR
STANDARD DOOR

1ST FLR

London City Airport
Get closer.

RECORD DRAWING

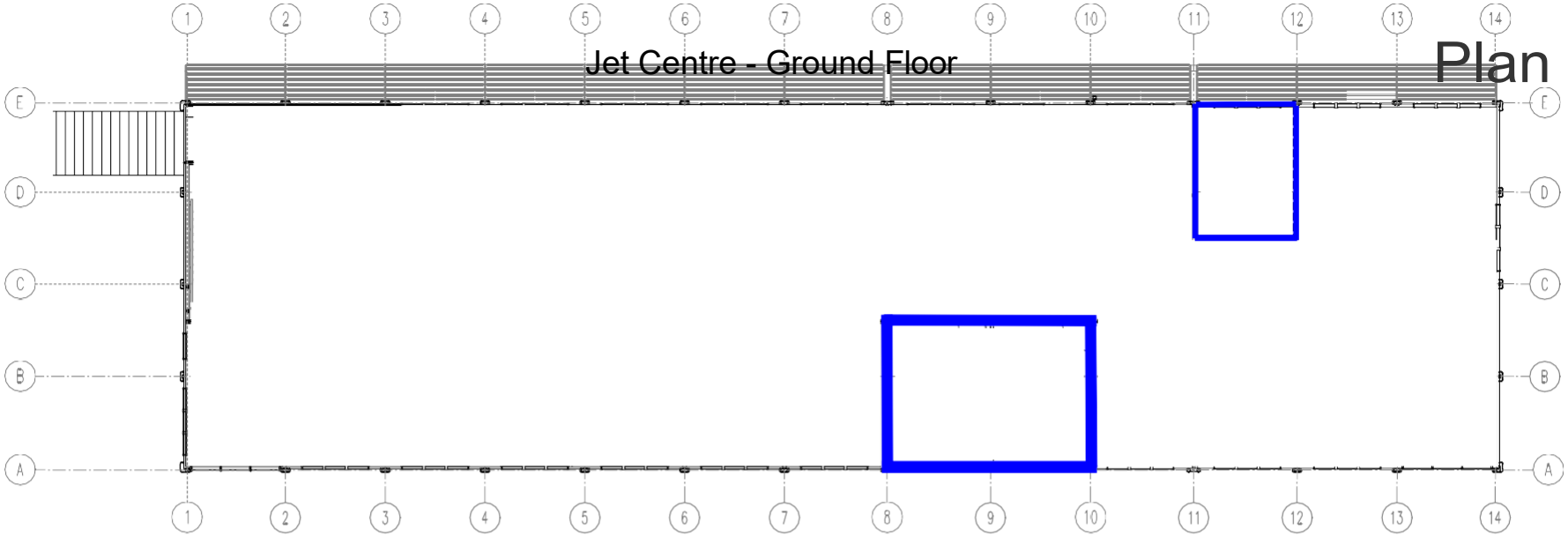
BLUE SHED

R/BS/1.0/A/001

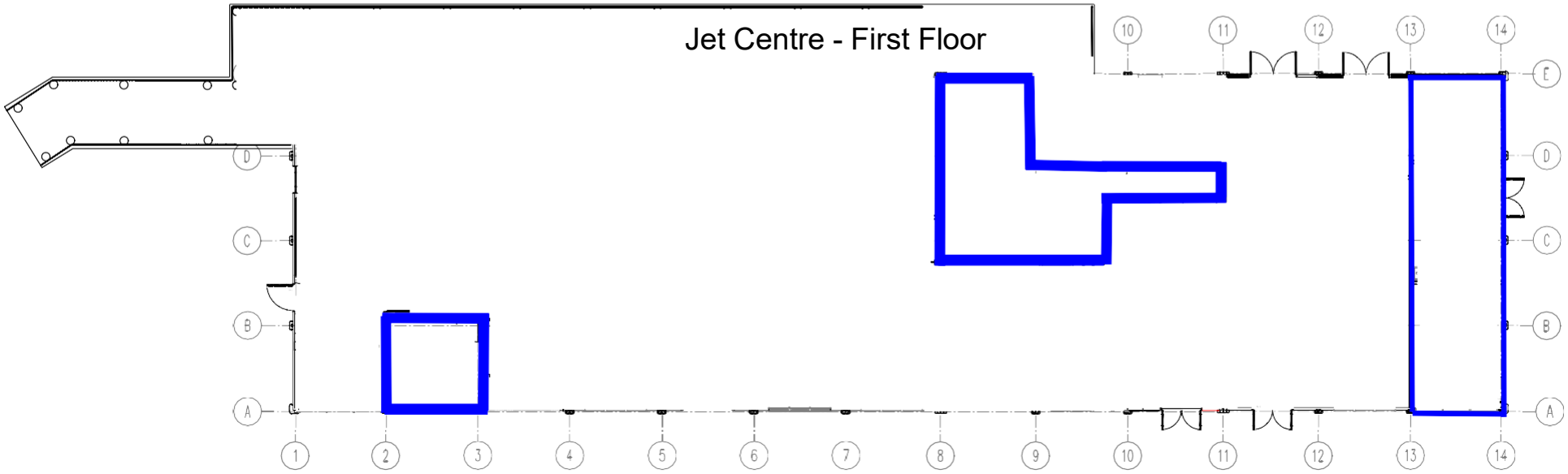
2021

Plan 7

Jet Centre - Ground Floor



Jet Centre - First Floor



LEGEND

X/XXX Fire Door

X/XXX Standard Door

C	Room Numbers Added	16/08/18
B	Layout amended	18/04/18
C	04/04/18	04/03/16
B	Door Numbers Added	04/03/16
A	Modified as indicated	12/08/15

G-I FLRS

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

RECORD DRAWING

JET CENTRE

Ground to First Floor
General Arrangement Plan

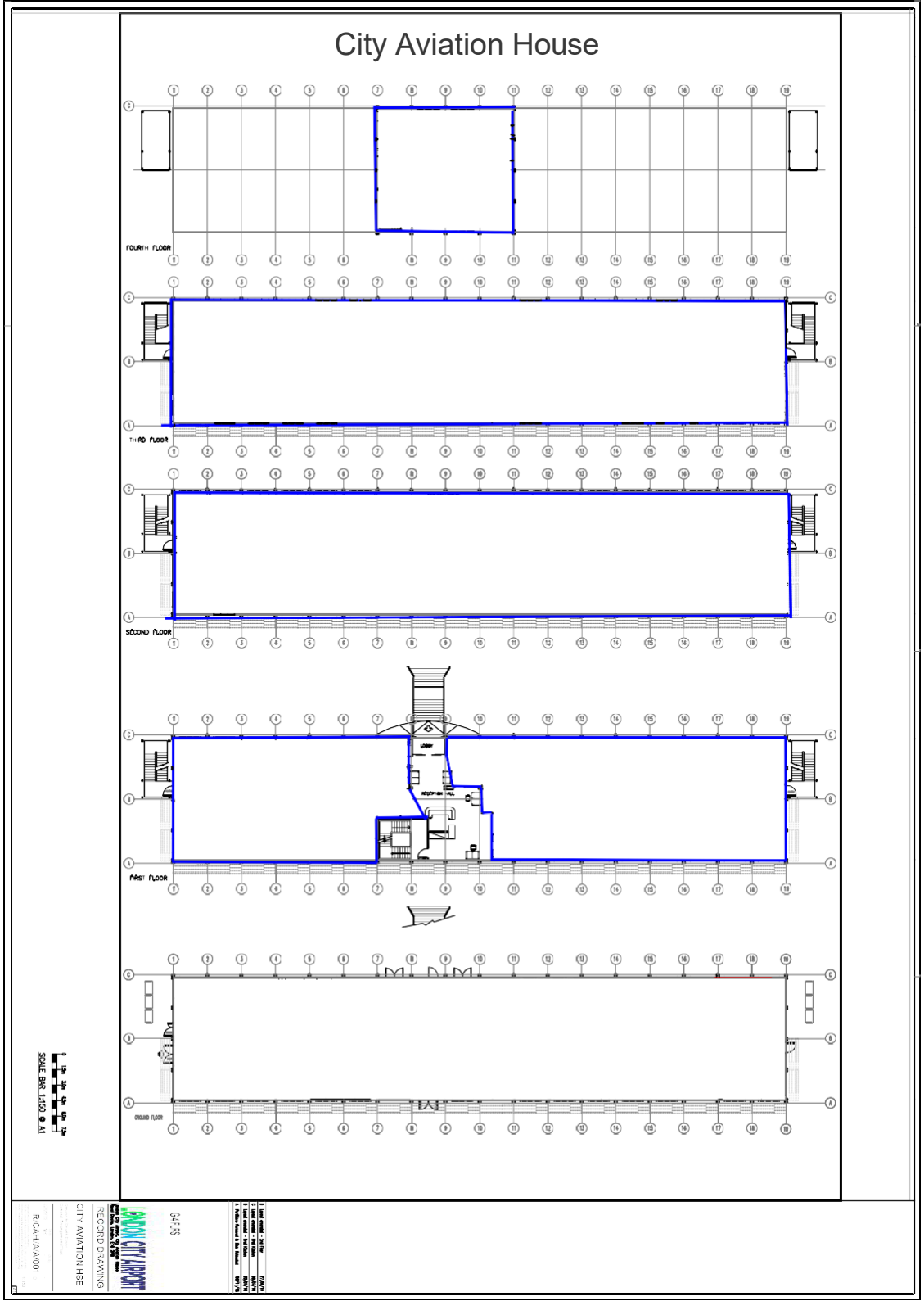
24/07/15 VR

R/JC/A/A/001 C

2022

SCALE BAR 1:75 @ A1

Plan 8


City Aviation House
FOURTH FLOOR
THIRD FLOOR
SECOND FLOOR
FIRST FLOOR
GROUND FLOOR
SCALE BAR 1:150 @ A1
LONDON CITY AIRPORT
RECORD DRAWING
CITY AVIATION HSE
RICAH/AA/001

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
- info@takebackpower.net
- press@takebackpower.net
- shut_the_system_info@proton.me
- campaigner@fossilfreelondon.org
- operations@fossilfreelondon.org
- YouthDemandPress@protonmail.com
- youthdemand@proton.me
- enquiries@extinctionrebellion.uk

Claim no: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR/S JUSTICE [ ]

ON: 30 June 2026

B E T W E E N : -

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) PLC
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

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 5 July 2024 by HHJ Coe KC ("**the HHJ Coe KC Orders**")

AND UPON the review of the HHJ Coe KC Order on 24 June 2025 by Mr Justice Bourne and the order of 24 June 2025 ("**the Bourne J Order**")

AND UPON the Claimants' application dated 2 June 2026

AND UPON the Claimants' application dated 18 June 2026 to re-amend the particulars of claim

AND UPON the review hearings in each of the following claims having been listed on 30 June 2026 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 HHJ Coe KC Order

IT IS ORDERED that:

1. The HHJ Coe KC Orders, as varied by the Bourne J Order, shall remain in full force and effect and subject to review, as provided for in paragraph 4 of the HHJ Coe KC Orders, subject to paragraph 3 of this Order.

2. The Claimants have permission to re-amend the particulars of claim in the form annexed to the application notice dated 18 June 2026.

3. The HHJ Coe KC Orders shall be varied by:

    a. the removal of paragraphs 16(1) and (2); and
    b. the replacement of the email addresses at Schedule 3 with the following list of email addresses:
        - juststopoil@protonmail.com
        - juststopoilpress@protonmail.com
        - info@juststopoil.org
        - info@takebackpower.net
        - press@takebackpower.net
        - shut_the_system_info@proton.me
        - campaigner@fossilfreelondon.org
        - operations@fossilfreelondon.org
        - YouthDemandPress@protonmail.com
        - youthdemand@proton.me
        - enquiries@extinctionrebellion.uk

4. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-002137

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR/S JUSTICE [ ]
ON: 30 June 2026

B E T W E E N : -

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMIED
(4) NIAL SERVICES LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT NEWCASTLE AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

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 injunctions made by Order dated 19 July 2024 by Ritchie J ("**the Ritchie J Orders**")

AND UPON the review of the Ritchie J Order on 24 June 2025 by Mr Justice Bourne and the order of 24 June 2025 ("**the Bourne J Order**")

AND UPON the Claimants' application dated 2 June 2026

AND UPON the Claimants' application dated 18 June 2026 to re-amend the claim form and re-amend the particulars of claim

AND UPON the review hearings in each of the following claims having been listed on 30 June 2026 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 Ritchie J Order

IT IS ORDERED that:

1. The Ritchie J Orders shall remain in full force and effect subject to review, as provided for in paragraph 2 of the Ritchie J Orders, subject to the amendments shown in Annexes 1 to 3 to this Order (which includes the variation as ordered by paragraph 2 of the Bourne J Order).

2. The Claimants have permission to re-amend the claim form and particulars of claim to:
   a. Re-amend the description of the Defendants.
   b. Substitute Plan 2, Plan 2A and Plan 2B with the plans annexed to the application dated 18 June 2026 marked Plan 2, Plan 2A and Plan 2b.
   c. Re-amend paragraph 14 of the amended particulars of claim to refer to the London Luton Airport Byelaws 2025 and the correct byelaws therein and otherwise in the form annexed to the application notice dated 18 June 2026.

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 Ritchie J Orders and by affixing this order at the locations marked "X" on the applicable Ritchie J Order (Plan 1, Plan 2 and Plan 3).

Annex 1

Amended by the order of The Hon. Dated [ ]

Schedule 1 ~~3~~ Plan Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(1) LEEDS BRADFORD AIRPORT LIMITED

AND THREE OTHERS

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex-parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the first witness statements: of Alexander James Wright dated 16 July 2024, 17 July 2024, (another) 17 July 2024; and 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden, Counsel for the Claimants and no one attending for the Defendants.

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

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to protestrequest@lba.co.uk.

DEFINITIONS

"**Leeds Bradford Airport**" means the land shown in red outlined in red on Plan 1 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

"**Amended Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.leedsbradfordairport.co.uk/injunction. at which copies of this Order may be viewed and downloaded).

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the First Defendant:

    a. Uploading a copy onto the following website: https://www.leedsbradfordairport.co.uk/injunction.

    b. Sending an email to each of the email addresses listed in Schedule 3 to this Order (1) stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and (2) attaching this Order.

    c. Affixing a notice at those locations marked with an "X" on Plan 1 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form of Schedule 4 and, in the case of any further applications or documents served pursuant to paragraph 9 of this Order, affixing a notice at

the locations marked with an "X" on Plan 1 setting out where the relevant application(s) or document(s) can be found and obtained in hard copy.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraph 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.

6. The Court will provide sealed copies of this Order to the First Claimant's solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3 and 4. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the First Defendant of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone 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 First Claimant's solicitors 72 hours' notice of such application by email to ~~StuartWortley~~alexwright@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.

13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

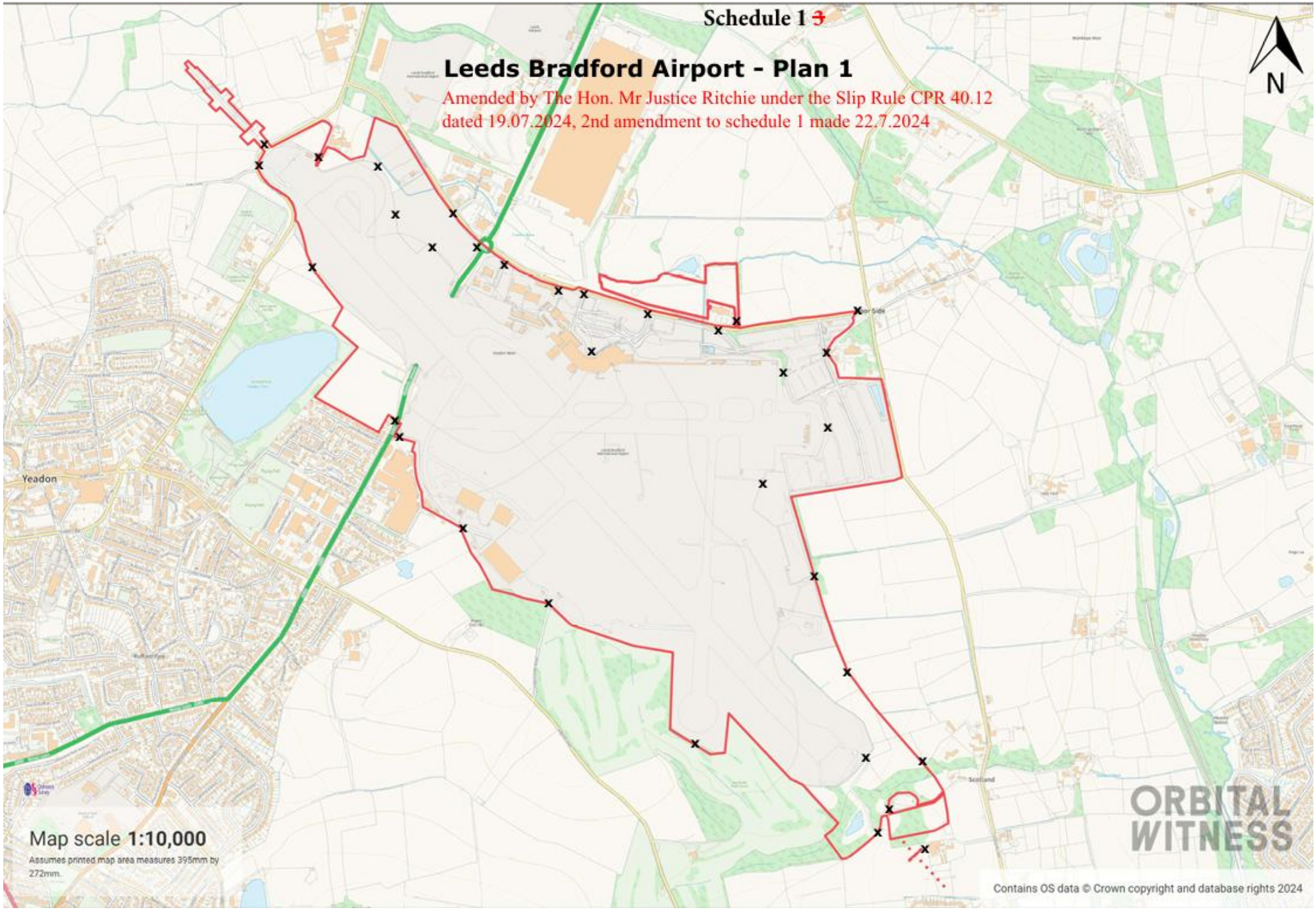
COMMUNICATIONS WITH THE FIRST CLAIMANT

The First Claimant's 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~~

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620


Schedule 1 ~~3~~
Leeds Bradford Airport - Plan 1
Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12
dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024
N
Yeadon
Map scale 1:10,000
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant will take steps to serve the First Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The First Claimant 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- ~~enquiries@extinctionrebellion.co.uk~~
- info@takebackpower.net
- press@takebackpower.net
- shut_the_system_info@proton.me
- campaigner@fossilfreelondon.org
- operations@fossilfreelondon.org
- YouthDemandPress@protonmail.com
- youthdemand@proton.me
- enquiries@extinctionrebellion.uk

SCHEDULE 4 – AMENDED WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Leeds Bradford Airport Limited (the "**First Claimant**")

This notice relates to the land known as Leeds Bradford Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the First Claimant.

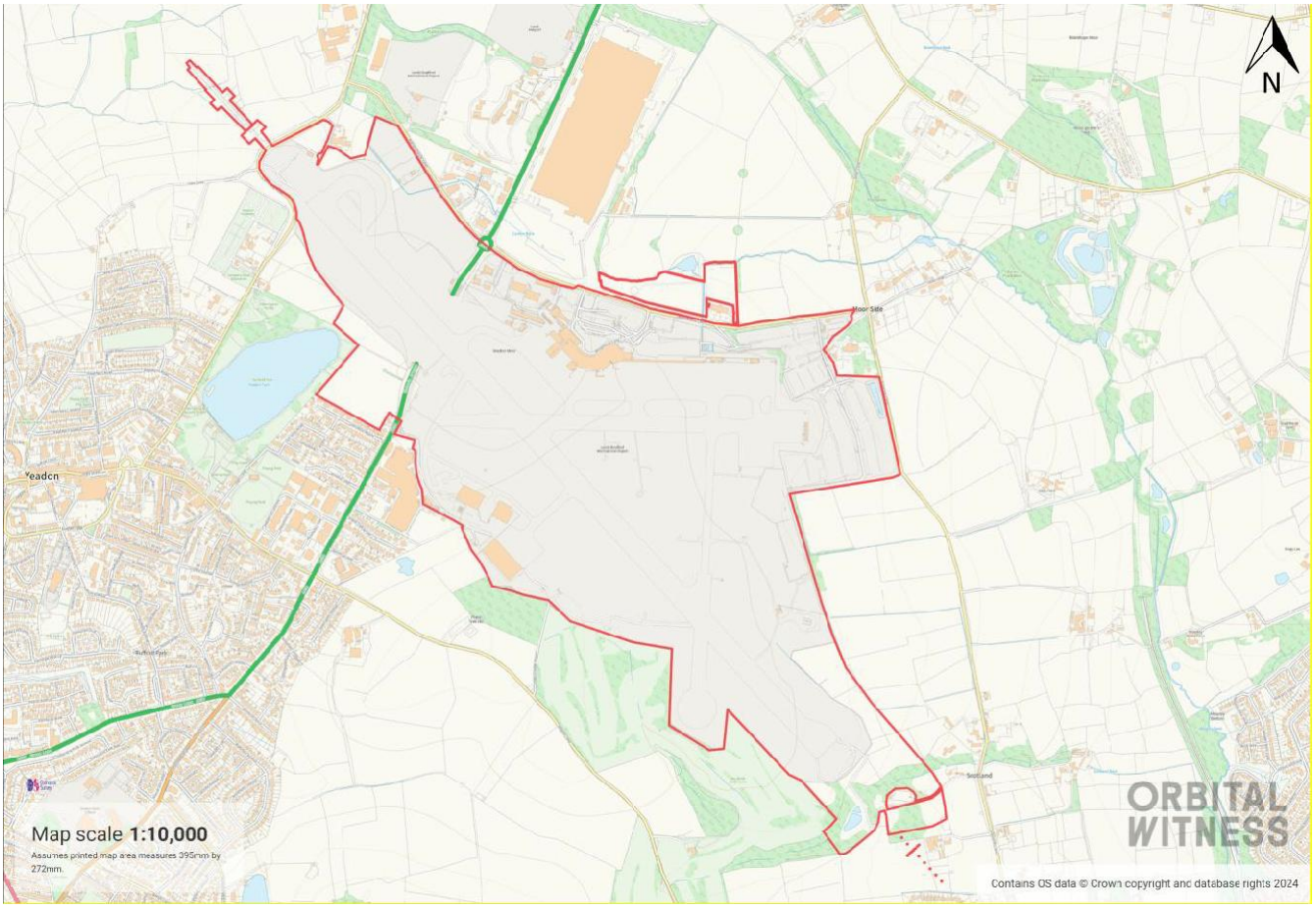
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: https://www.leedsbradfordairport.co.uk/injunction

Copies may also be obtained from the Information Desk or by contacting Alexander Wright ~~Stuart Wortley~~ of Eversheds Sutherland on ~~0771 288 1393~~ 07500578620 or by email alexwright@eversheds-sutherland.com ~~stuartwortley@eversheds-sutherland.com~~.


N
Yeadon
Moor Side
Scotland
Map scale 1:10,000
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
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Annex 2

Amended by the order of The Hon. Dated [ ]

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

AND THREE OTHERS

Claimants

- v -

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 19 July 2024.

UPON the Claimants' claim by the Claim Form issued on 16 July 2024.

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, dated 17 July 2024, (and another) 17 July 2024 and dated 18 July 2024; Vincent Hodder dated 15 July 2024; Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants.

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

AND UPON the Second Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London Luton Airport, as defined by this Order, should be made by email to protestrequest@ltn.aero.

DEFINITIONS

"**London Luton Airport**" means the land shown in red outlined in red on Plan 2 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

"**Amended Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.london-luton.co.uk/corporate/lla-publications/injunction at which copies of this Order may be viewed and downloaded.

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of London Luton Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.

2. This Order is subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Second Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the Second Defendant:

    a. Uploading a copy onto the following website: https://www.london-luton.co.uk/corporate/lla-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 and attaching this Order.

    c. Affixing a notice at those locations marked with an "X" on Plan 2 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form in Schedule 4 and, in the case of any further applications or documents served pursuant to paragraph 9 of this Order, affixing a notice at the locations marked with an "X" on Plan 2 setting out where the relevant application(s) or document(s) can be found and obtained in hard copy.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the Second Defendant and each of them.

6. The Court will provide sealed copies of this Order to the Second Claimant's solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the Second Defendant of any further applications or documents in the proceedings by the Second Claimant shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone 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 Second Claimant's solicitors 72 hours' notice of such application by email to ~~StuartWortley~~alexwright@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Second Claimant's solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second Claimant's solicitors.

13. The Second Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE SECOND CLAIMANT

The Second Claimant's solicitors and their contact details are:

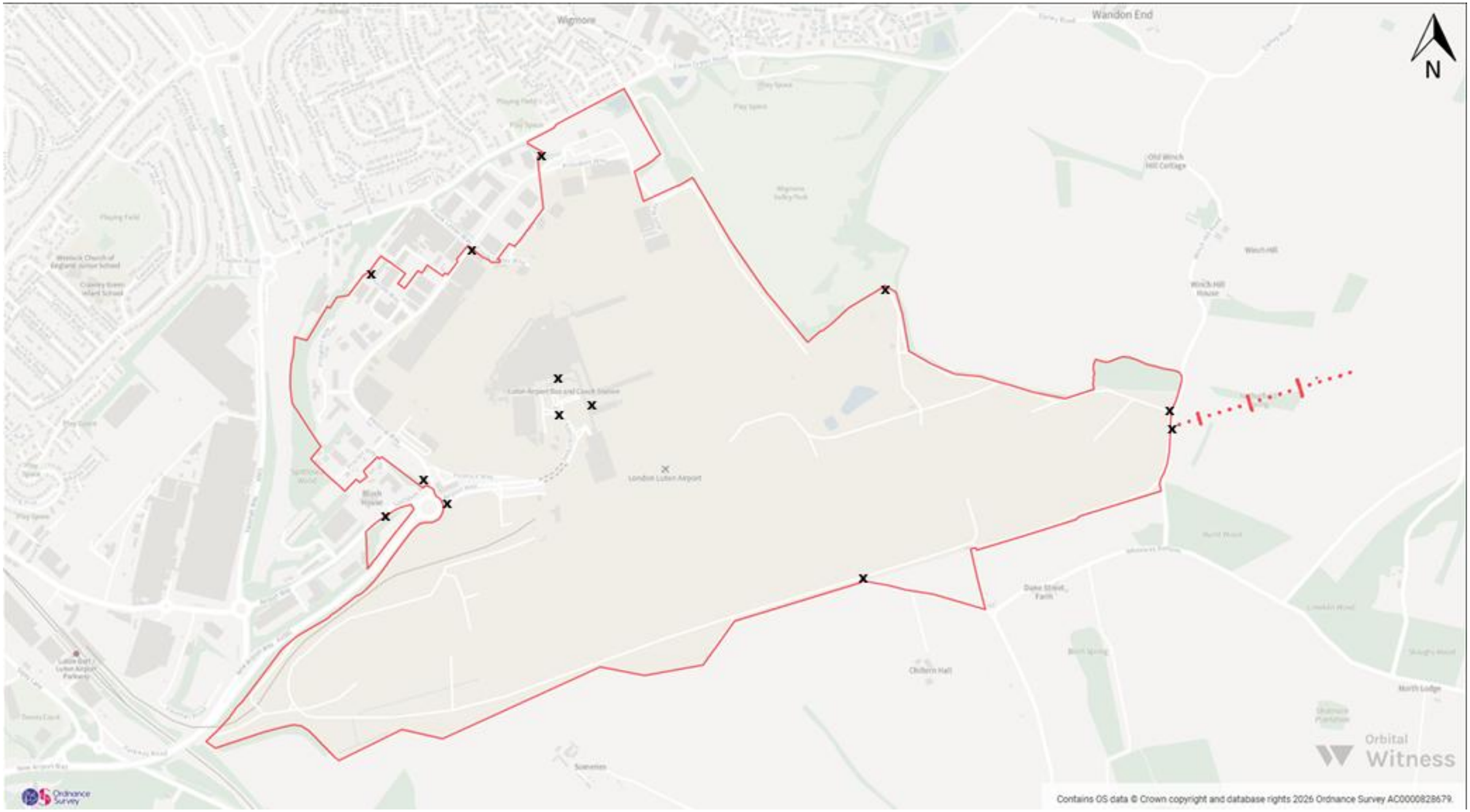
~~(1) Stuart Wortley~~
~~Eversheds Sutherland (International) LLP~~
~~StuartWortley@eversheds-sutherland.com~~
~~07712 881 393~~

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

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

LONDON LUTON AIRPORT PLAN 2



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND CLAIMANT

(1) The Second Claimant will take steps to serve the Second Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The Second Claimant 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- ~~enquiries@extinctionrebellion.co.uk~~
- info@takebackpower.net
- press@takebackpower.net
- shut_the_system_info@proton.me
- campaigner@fossilfreelondon.org
- operations@fossilfreelondon.org
- YouthDemandPress@protonmail.com
- youthdemand@proton.me
- enquiries@extinctionrebellion.uk

SCHEDULE 4 – AMENDED WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: London Luton Airport Operations Limited (the "**Second Claimant**")

This notice relates to the land known as London Luton Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the Second Claimant.

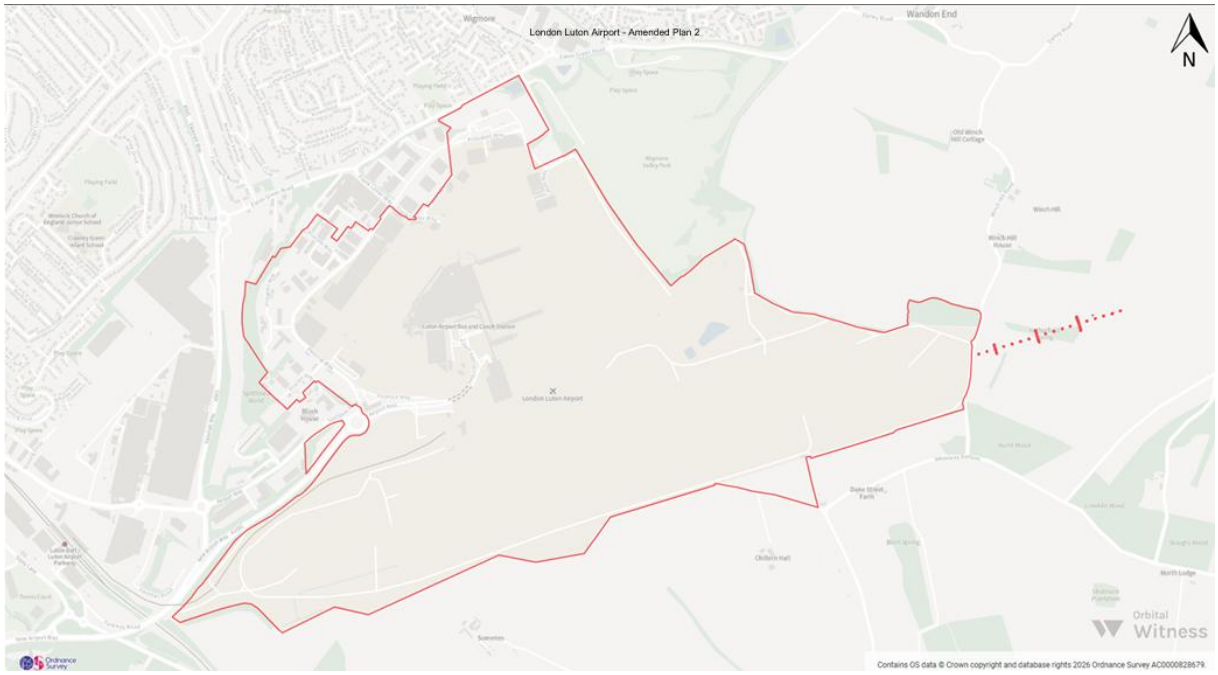
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Second Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: https://www.london-luton.co.uk/corporate/lla-publications/injunction

Copies may also be obtained from the Information Desk or by contacting Alexander Wright ~~Stuart Wortley~~ of Eversheds Sutherland ~~on 0771 288 1393~~ on 07500578620 or by email alexwright@eversheds-sutherland.com ~~stuartwortley@eversheds-sutherland.com~~.


London Luton Airport - Amended Plan 2
N
Wigmore
Wandon End
Orbital Witness
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Annex 3

Amended by the order of The Hon. Dated [ ]

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

AND TWO OTHERS

Claimants

- v -

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE The Honourable Mr Justice Ritchie on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, 17 July 2024, (and another) 17 July 2024, dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants

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

AND UPON the Third and Fourth Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Newcastle International Airport, as defined by this Order, should be made by email to protestrequest@newcastleinternational.co.uk

DEFINITIONS

"**Newcastle International Airport**" means the land shown in red outlined in red on Plan 3 to

the Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

"**Amended Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.newcastleairport.com/about-your-airport/airport-company/injunction/ at which copies of this Order may be viewed and downloaded).

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Newcastle International Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants (or either of them).

2. This Order is subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Third and Fourth Claimants shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the Third Defendant:

    a. Uploading a copy onto the following website: https://www.newcastleairport.com/about-your-airport/airport-company/injunction/

    b. Sending an email with this Order attached 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. Affixing a notice at those locations marked with an "X" on Plan 3 setting out where these documents can be found and obtained in hard copy in the form of Schedule 4 and, in the case of any further applications or documents served pursuant to paragraph 9 of this Order, affixing a notice at the locations

marked with an "X" on Plan 1 setting out where the relevant application(s) or document(s) can be found and obtained in hard copy.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraph 3 shall be good and sufficient service of this Order and of the Claim Documents upon the Third Defendant and each of them.

6. The Court will provide sealed copies of this Order to the Third and Fourth Claimants' solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraphs 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the Third Defendant of any further applications or documents in the proceedings by the Third and Fourth Claimants shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone 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 Third and Fourth Claimants' solicitors 72 hours' notice of such application by email to ~~StuartWortley~~ alexwright @eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Third and Fourth Claimants' solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Third and Fourth Claimants' solicitors.

13. The Third and Fourth Claimants (or either of them) have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19.7.2024

COMMUNICATIONS WITH THE THIRD AND FOURTH CLAIMANTS

The Third and Fourth 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~~

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1


Newcastle International Airport - Plan 3
N
Prestwick
Newcastle International Airport
ORBITAL WITNESS
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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE THIRD AND FOURTH CLAIMANTS

(1) The Third and Fourth Claimants will take steps to serve the Third Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The Third and Fourth 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- ~~enquiries@extinctionrebellion.co.uk~~
- info@takebackpower.net
- press@takebackpower.net
- shut_the_system_info@proton.me
- campaigner@fossilfreelondon.org
- operations@fossilfreelondon.org
- YouthDemandPress@protonmail.com
- youthdemand@proton.me
- enquiries@extinctionrebellion.uk

SCHEDULE 4 – AMENDED WARNING NOTICE

HIGH COURT CLAIM NO: KB-2024-002317

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Newcastle International Airport Limited and NIAL Services Limited (the "**Third and Fourth Claimants**")

This notice relates to the land known as Newcastle International Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the Third and Fourth Claimants.

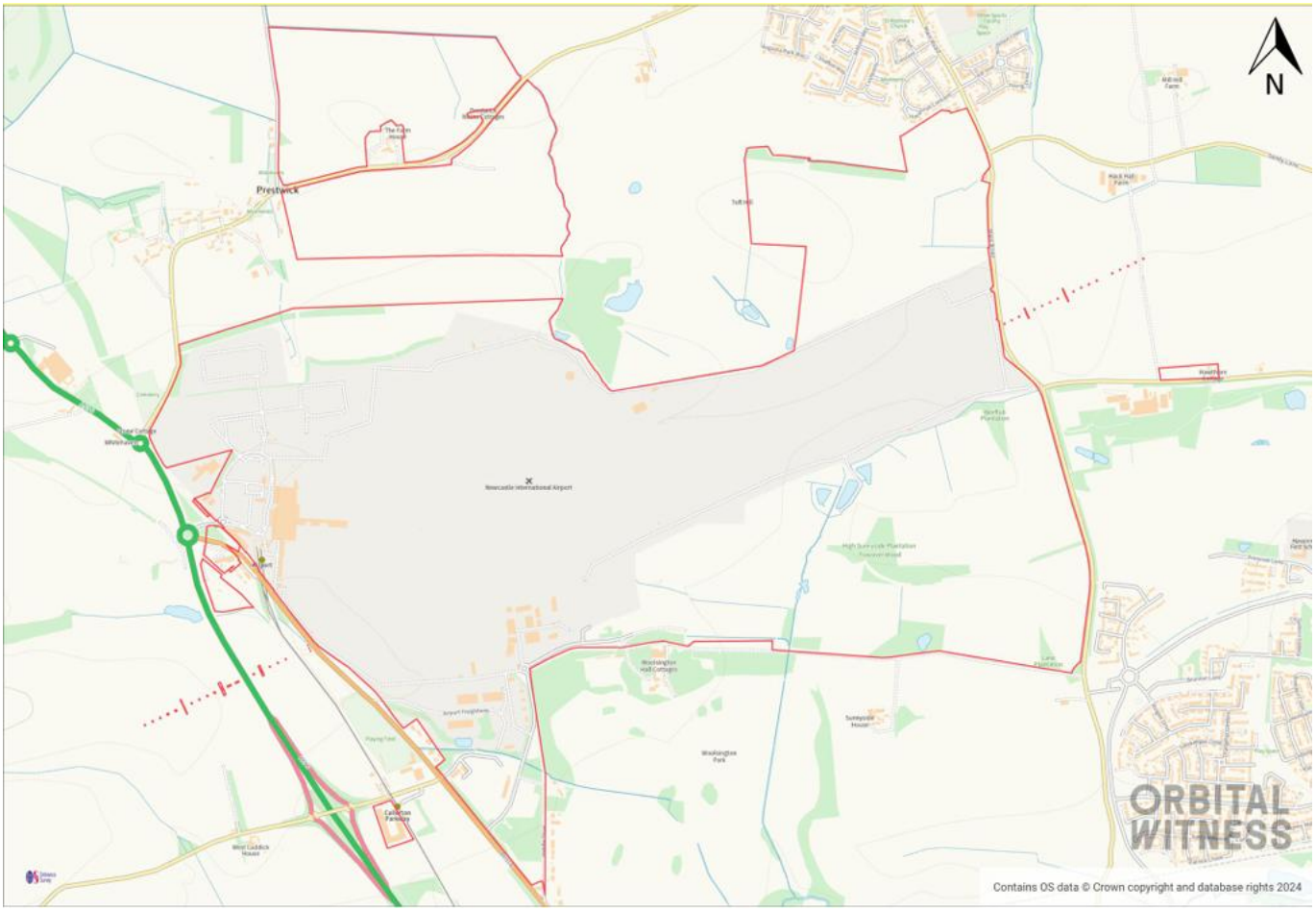
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Third and Fourth Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at:
https://www.newcastleairport.com/about-your-airport/airport-company/injunction/

Copies may also be obtained from the Information Desk or by contacting Alexander Wright ~~Stuart Wortley~~ of Eversheds Sutherland on ~~0771 288 1393~~ 07500578620 or by email alexwright@eversheds-sutherland.com ~~stuartwortley@eversheds-sutherland.com~~


N
Prestwick
Newcastle International Airport
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR/S JUSTICE [ ]
ON: 30 June 2026

B E T W E E N : -

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORT LIMITED
(6) BRISTOL AIRPORT DEVELOPMENT LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

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 6 August 2024 by Jacobs J ("**the Jacobs J Orders**")

AND UPON the review of the Jacobs J Orders on 24 June 2025 by Mr Justice Bourne and the order of 24 June 2025 ("**the Bourne J Order**")

AND UPON the Claimants' application dated 2 June 2026

AND UPON the Claimants' application dated 18 June 2026 to re-amend the claim form and re-amend the particulars of claim

AND UPON the review hearings in each of the following claims having been listed on 30 June 2026 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 Jacobs J Order

IT IS ORDERED that:

1. The Jacobs J Orders shall remain in full force and effect subject to review, as provided for in paragraph 2 of the Jacobs Order, and subject to the amendments shown in Annexes 1 to 3 of this Order.

2. The Claimants have permission to re-amend the claim form and particulars of claim to amend the description of the Defendants and otherwise in the form annexed to the application notice dated 18 June 2026.

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Annex 1

Amended by order of [ ] dated [ ]

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(1) BIRMINGHAM AIRPORT LIMITED

AND FIVE OTHERS

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE THE HONOURABLE MR JUSTICE

JACOBS ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

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

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Birmingham Airport, as defined by this Order, should be made by email to protestrequest@birminghamairport.co.uk

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Birmingham Airport**" means the land outlined in red on Plan 1 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

"**Amended Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Birmingham Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list). Such hearing shall be listed to be heard with the review of any injunctions made in all or any of the claims with the Claims, with a time estimate of 1 day ~~with a time estimate of 2 ½ hours~~. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.Birminghamairport.co.uk/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. Affixing a Warning Notice approximately at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.Birminghamairport.co.uk/injunction.

9. The Court will provide sealed copies of this Order to the First Claimant's solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone 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 First Claimant's solicitors 72 hours' notice of such application by email to ~~StuartWortley~~alexwright@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.

13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for

further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FIRST CLAIMANT

16. The First Claimant's 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~~

Alexander Wright

Eversheds Sutherland (International) LLP

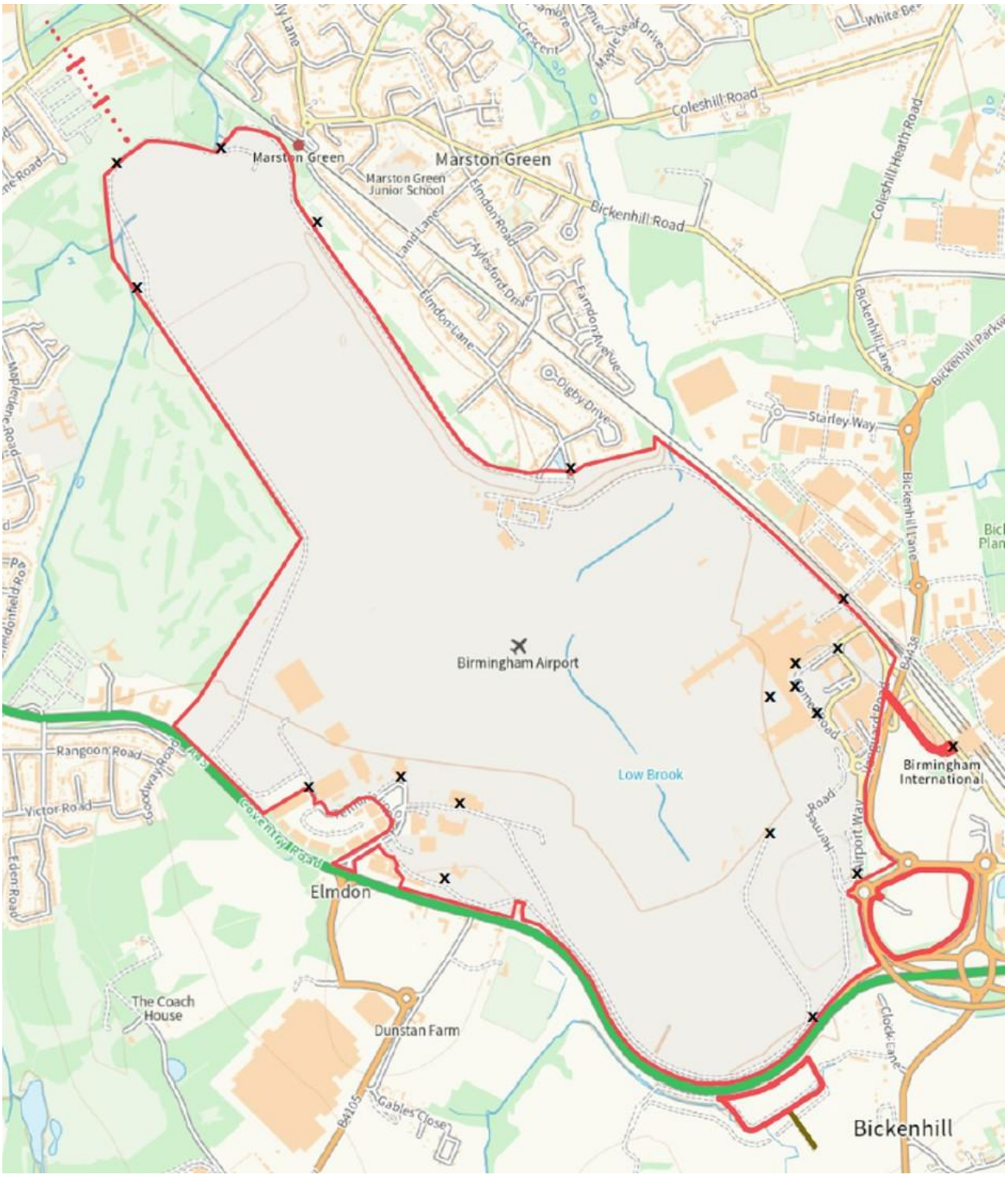
alex.wright@eversheds-sutherland.com

07500 578620

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Marston Green
Marston Green
Marston Green Junior School
Coleshill Road
Bickenhill Road
Coleshill Heath Road
Elmdon Road
Aylesford Drive
Elmdon Lane
Fanshaw Avenue
Digby Drive
Starley Way
Bickenhill Lane
Birmingham Airport
Low Brook
Birmingham International
Rangoon Road
Victor Road
Goodway Road
Coventry Road
Elmdon
The Coach House
Dunstan Farm
B4105
Gables Close
Bickenhill

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- ~~enquiries@extinctionrebellion.co.uk~~
- info@takebackpower.net
- press@takebackpower.net
- shut_the_system_info@proton.me
- campaigner@fossilfreelondon.org
- operations@fossilfreelondon.org
- YouthDemandPress@protonmail.com
- youthdemand@proton.me
- enquiries@extinctionrebellion.uk

SCHEDULE 4 – AMENDED WARNING NOTICE

KB-2024-002473 High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Birmingham Airport Limited (the "**First Claimant**")

This notice relates to the land known as Birmingham Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the First Claimant.

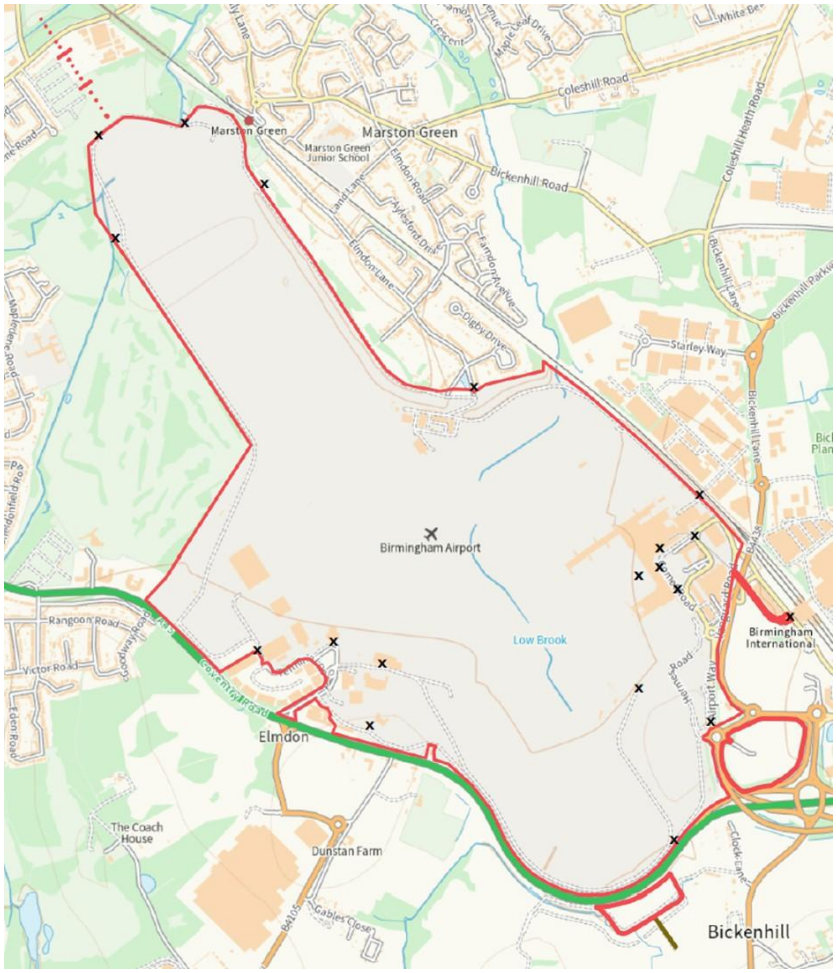
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at:
https://www.Birminghamairport.co.uk/injunction

Copies may also be obtained from the Information Desk or by contacting Alexander Wright ~~Stuart Wortley~~ of Eversheds Sutherland on ~~0771 288 1393~~ 07500578620 or by email alexwright@eversheds-sutherland.com ~~stuartwortley@eversheds-sutherland.com~~.


Marston Green
Marston Green Junior School
Coleshill Road
Bickenhill Road
Coleshill Heath Road
Starley Way
Birmingham Airport
Low Brook
Rangoon Road
Victor Road
Elmdon
The Coach House
Dunstan Farm
Gables Close
Birmingham International
Bickenhill

ANNEX 2

Amended by order of [ ] dated [ ]

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED

AND FOUR OTHERS

- v -

Claimants

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE THE HONOURABLE MR JUSTICE

JACOBS ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

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

AND UPON the Second and Third Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Liverpool Airport, as defined by this Order, should be made by email to protestrequest@liverpoolairport.com

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Liverpool Airport**" means the land outlined in red on Plan 2 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

"**Amended Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of Liverpool Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second and Third Claimants.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list). Such hearing shall be listed to be heard with the review of any injunctions made in all or any of the claims with the Claims, with a time estimate of 1 day ~~with a time estimate of 2 ½ hours~~. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.liverpoolairport.com/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. Affixing an Amended Warning Notice approximately at those locations marked with an "X" on Plan 2 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.liverpoolairport.com/injunction.

9. The Court will provide sealed copies of this Order to the Second and Third Claimants' solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone 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 Second and Third Claimants' solicitors 72 hours' notice of such application by email to ~~StuartWortley~~alexwright@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Second and Third Claimants' solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second and Third Claimants' solicitors.

13. The Second and Third Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE SECOND AND THIRD CLAIMANTS

16. The Second and Third 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~~

Alexander Wright
Eversheds Sutherland (International) LLP
alex.wright@eversheds-sutherland.com
07500 578620

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Liverpool Airport - Plan 2
N
Map scale 1:11,000
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND AND THIRD CLAIMANTS

(1) The Second and Third 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- ~~enquiries@extinctionrebellion.co.uk~~
- info@takebackpower.net
- press@takebackpower.net
- shut_the_system_info@proton.me
- campaigner@fossilfreelondon.org
- operations@fossilfreelondon.org
- YouthDemandPress@protonmail.com
- youthdemand@proton.me
- enquiries@extinctionrebellion.uk

SCHEDULE 4 – AMENDED WARNING NOTICE
KB-2024-002473 High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Liverpool Airport Limited and Peel L&P Investments (North) Limited (the "**Second and Third Claimants**")

This notice relates to the land known as Liverpool Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the Second and Third Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Second and Third Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at: https://www.liverpoolairport.com/injunction

Copies may also be obtained from the Information Desk or by contacting Alexander Wright ~~Stuart Wortley~~ of Eversheds Sutherland on ~~0771 288 1393~~ 07500578620 or by email alexwright@eversheds-sutherland.com ~~stuartwortley@eversheds-sutherland.com~~.


Liverpool Airport - Plan 2
N

ANNEX 3

Amended by order of [ ] dated [ ]

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

AND THREE OTHERS

Claimants

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

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).

BEFORE THE HONOURABLE MR JUSTICE

JACOBS ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

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

AND UPON the Fourth, Fifth and Sixth Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Bristol Airport, as defined by this Order, should be made by email to protestrequest@Bristolairport.com

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Bristol Airport**" means the land shown outlined in red on Plan 3 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

"**Amended Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Bristol Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Fourth, Fifth and Sixth Claimants.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list). Such hearing shall be listed to be heard with the review of any injunctions made in all or any of the claims with the Claims, with a time estimate of 1 day ~~with a time estimate of 2 ½ hours~~. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.Bristolairport.com/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. Affixing an Amended Warning Notice approximately at those locations marked with an "X" on Plan 3 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.Bristolairport.com/injunction.

9. The Court will provide sealed copies of this Order to the Fourth, Fifth and Sixth Claimants' solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone 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 Fourth, Fifth and Sixth Claimants' solicitors 72 hours' notice of such application by email to ~~StuartWortley~~alexwright@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Fourth, Fifth and Sixth Claimants' solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Fourth, Fifth and Sixth Claimants' solicitors.

13. The Fourth, Fifth and Sixth Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

COMMUNICATIONS WITH THE FOURTH, FIFTH AND SIXTH CLAIMANTS

16. The Fourth, Fifth and Sixth 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~~

Alexander Wright

Eversheds Sutherland (International) LLP

alex.wright@eversheds-sutherland.com

07500 578620

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Bristol Airport - Plan 3
N
Downside
Lulsgate Bottom
ORBITAL WITNESS
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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FOURTH, FIFTH AND SIXTH CLAIMANTS

(1) The Fourth, Fifth and Sixth 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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- ~~enquiries@extinctionrebellion.co.uk~~
- info@takebackpower.net
- press@takebackpower.net
- shut_the_system_info@proton.me
- campaigner@fossilfreelondon.org
- operations@fossilfreelondon.org
- YouthDemandPress@protonmail.com
- youthdemand@proton.me
- enquiries@extinctionrebellion.uk

SCHEDULE 4 –AMENDED WARNING NOTICE

KB-2024-002473 High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Bristol Airport Limited, South West Airports Limited and Bristol Developments Limited (the "**Fourth, Fifth and Sixth Claimants**")

This notice relates to the land known as Bristol Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the Fourth, Fifth and Sixth Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fourth, Fifth and Sixth Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at:
https://www.Bristolairport.com/injunction.

Copies may also be obtained from the Information Desk or by contacting Alexander Wright ~~Stuart Wortley~~ of Eversheds Sutherland on ~~0771 288 1393~~ 07500578620 or by email alexwright@eversheds-sutherland.com ~~stuartwortley@evershedssutherland.com~~.


Bristol Airport - Plan 3
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Downside
Lulsgate Bottom