

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**

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**WITNESS STATEMENT OF ALEXANDER JAMES WRIGHT**

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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:

	<b>Airport(s)</b>	<b>Action Number</b>	<b>Judge / Date of Order</b>
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:

<b>London Luton Airport Byelaws 2025</b>	
4.1	<i>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)</i>
4.2	<i>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).</i>
4.4	<i>No person, without Permission, shall enter or remain in an Airside location other than for a reasonable and proper purpose.</i>
5.2	<i>No person (other than an Exempt Person) shall enter, remain or work in any Airside location, unless:</i>  <i>5.2.1 that person holds an Identity Pass which permits that person access to the relevant Airside location, or</i>  <i>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.</i>
7.1	<i>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).</i>
8.4	<i>No person, without Permission, shall behave in such a way so as to endanger themselves or any other person.</i>
8.5	<i>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).</i>
8.8	<i>No person, without Permission, shall organise or take part in any public assembly, protest, demonstration or procession.</i>

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:

<b>Date</b>	<b>Location</b>	<b>Brief Details</b>
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 Take Back Power

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: <ul style="list-style-type: none"> <li>• took various food items, without paying, from a supermarket in Brixton;</li> <li>• occupied the luxury department store Liberty; and</li> <li>• disrupted access to the luxury hotel, Claridge's.</li> </ul>

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:

	<b>Airport(s)</b>	<b>Action Number</b>	<b>Judge / Date of Order</b>
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:

<b>Claim Number</b>	<b>Property</b>	<b>Claimant(s)</b>	<b>Duration of Injunction</b>
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 injunctioned 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](mailto:info@takebackpower.net) and [press@takebackpower.net](mailto:press@takebackpower.net) which are understood to be linked to Take Back Power;

16.1.2.2 [shut\\_the\\_system\\_info@proton.me](mailto:shut_the_system_info@proton.me), which is understood to be linked to Shut the System;

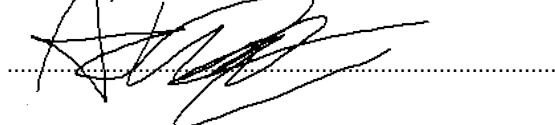
16.1.2.3 [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org) and [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org) which are understood to be linked to Fossil Free London; and

16.1.2.4 [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com) and [youthdemand@proton.me](mailto: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	<i>No person shall distribute or display signs, advertisements, circulars or other printed or written matter without permission.</i>	8.9	<i>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.</i>
		8.10	<i>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.</i>
		8.13	<i>No person, without Permission, shall distribute or display signs, advertisements, pamphlets, flyers, circulars or other printed or written matter.</i>

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:
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  - 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. **"Airsides"** 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.