

## C: Charges Register continued

of this covenant committed after the Purchaser shall have parted with all interest in the land in respect of which such breach shall occur as follows:-

(a) No pit heap of any kind shall be placed upon any part of the land hereby conveyed.

(b) No building or erection shall be built or erected on the land hereby conveyed unless the plans thereof shall have been previously submitted to and approved by the Vendor or his agent (Provided that such consent shall not be unreasonably withheld) and all such buildings shall be well and substantially built.

- 9 The parts of the land affected thereby are subject to the following rights granted by a Deed dated 4 October 1965 made between (1) Robert Graham Thompson (Grantor) and (2) Robert Wedderburn Walker and Thomas Edward Dixon (Grantees):-

THE Grantor hereby grants to the Grantees FIRST the right to have use maintain repair cleanse and renew in Prestwick West in the position indicated on the said plan by a red line a water pipe of a diameter not in excess of one inch at a depth of not less than two feet three inches for the purpose of supplying water to Prestwick East AND SECONDLY for the purposes aforesaid the right to enter upon Prestwick West the Grantees doing as little damage as may be and making good all damage done by the exercise of such right (except and reserved to the Grantor the full and free right to a supply of water for the trough constructed on Prestwick West by the Grantees at their expense in the position indicated in red on the said plan)

NOTE: Copy plan filed under ND95984.

- 10 A Conveyance of the land edged and numbered 16 in blue on the title plan dated 30 April 1968 made between (1) The National Coal Board and (2) The Lord Mayor Aldermen and Citizens of the City and Council of Newcastle upon Tyne contains restrictive covenants.

NOTE: Copy filed under TY424276.

- 11 The land edged and numbered 28 in blue on the title plan is subject to the following rights granted by a Deed dated 10 August 1970 made between (1) Robert Graham Thompson (Grantor) and (2) The Gas Council (Grantees):

the Grantor as beneficial owner (and to the intent that the easements hereby granted shall be appurtenant to the statutory gas undertaking of the Grantees) hereby grants unto the Grantees ALL THOSE easements to lay construct erect use maintain inspect alter enlarge renew replace or render unusable a main or pipe for the transmission or storage of gas or other materials connected with the exercise and performance of the functions of the Grantees and all necessary apparatus ancillary thereto (all hereinafter called "the said works") in through upon and over strips of land twenty feet in width indicated for identification purposes only by the lines marked A-B C-D and E-F drawn on the plan annexed hereto and thereon coloured pink (hereinafter called "the said strip of land") and to pass over the said strip of land and over strips of land ten feet wide adjoining the said strip of land for the purposes of the said works and of any works of the Grantees continuous therewith and over the said land for the purposes of access to the said strip of land at all reasonable times and in emergency at any time whether or not with workmen vehicles machinery and apparatus

The said Deed also contains restrictive covenants by the grantor details of which are set out in the schedule of restrictive covenants hereto.

NOTE: Copy plan filed under ND120151.

- 12 An Agreement under hand affecting the land edged and numbered 3 and 4 in blue on the title plan dated 22 December 1970 made between (1) Newcastle and Gateshead Water Company and (2) The National Coal Board relates to a water main.

NOTE: Copy filed under TY107669.

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- 13 The parts of the land affected thereby are subject to the following rights granted by a Deed dated 12 June 1972 made between (1) Robert Graham Thompson (Grantor) and (2) The Reo Stakis Organisation Limited (Grantee):-

the Grantor as beneficial owner hereby grants unto the Grantee full right and liberty for the Grantee to lay construct use maintain inspect take up cleanse renew and replace one pipe not exceeding Twelve inches in diameter between the points A and B on the plan with four manholes at the points numbered 2 3 4 and 5 on the plan such pipe to be laid at a depth from the surface of not less than Two feet and manholes numbered 2 and 3 to be laid at a depth of not less than Two feet six inches from the surface and to convey through the said pipe surface water only from the green land and also with or without agents servants machinery plant and vehicles to pass upon and over strips of land twelve feet wide adjoining and on either side of the said pipe for the purpose of exercising the rights hereby granted

*NOTE: Copy plan filed under ND79304.*

- 14 The land is subject to the rights granted by a Deed of Grant dated 7 August 1972 made between (1) Thomas Edward Dixon and Joseph William Norman Petty and (2) The Reo Stakis Organisation Limited.

*NOTE: Copy filed under TY424276.*

- 15 (27.06.2005) The land is subject to the rights granted by a Deed dated 13 August 1973 made between (1) The Lord Mayor Aldermen and Citizens of the City and County of Newcastle upon Tyne and (2) The Norwich Union Life Insurance Society.

The said Deed also contains restrictive covenants by the grantor.

*NOTE: Copy filed under TY198578.*

- 16 The land is subject to the rights granted by a Deed dated 11 October 1973 made between (1) The Lord Mayor Aldermen and Citizens of the City and County of Newcastle upon Tyne and (2) The Norwich Union Life Assurance Society.

The said Deed also contains restrictive covenants by the grantor.

*NOTE: Copy filed under TY198578.*

- 17 A Conveyance of the land tinted pink on the title plan dated 8 November 1973 made between (1) The National Coal Board and (2) Northern England Brick Company Limited contains restrictive covenants.

*NOTE: Copy filed under TY424276.*

- 18 A Deed affecting the land edged and numbered 1 and 2 in blue on the title plan dated 19 May 1975 made between (1) John Barron White and Barbara Ellen White (First Party) and (2) John T. Bell & Sons Limited (Second Party) contains covenants details of which are set out in the schedule of restrictive covenants hereto.

- 19 A Conveyance of the land edged and numbered 3 and 4 in blue on the title plan dated 8 April 1982 made between (1) The National Coal Board (2) Coal Industry Estates Limited and (3) Daleus Joan Vipond contains restrictive covenants.

*NOTE: Copy filed under TY107669.*

- 20 A Conveyance of the land edged and numbered 5 in blue on the title plan dated 14 June 1983 made between (1) The National Coal Board (Coal Board) (2) Coal Industry Estates Limited (Company) and (3) James Arthur Reed (Purchaser) contains covenants details of which are set out in the schedule of restrictive covenants hereto.

- 21 A Conveyance of the land edged and numbered 10 in blue on the title plan dated 16 September 1988 made between (1) The British Coal Corporation and (2) John Barron White and Barbara Ellen White contains restrictive covenants.

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NOTE 1: The provisions of the earlier documents referred to in the above deed are not relevant to the title

NOTE 2: Copy filed under TY213087.

- 22 A Conveyance of the land edged and numbered 18 in blue on the title plan dated 17 November 1992 made between (1) Robert Thompson and John William Thompson (2) John Richard Adamson and (3) Newcastle International Airport Limited contains restrictive covenants.

NOTE: Copy filed under ND79304.

- 23 The land is subject to the rights reserved by the Conveyance dated 17 November 1992 referred to above.
- 24 A Deed dated 17 November 1992 affecting the land edged and numbered 18 in blue on the title plan made between (1) John Richard Adamson and (2) Newcastle International Airport Limited relates to the granting of rights as therein mentioned.

NOTE: Copy filed under ND79304.

- 25 The parts of the land affected thereby are subject to the following rights granted by a Deed dated 14 January 1993 made between (1) Robert Thompson and John William Thompson (Grantor) and (2) British Gas plc:

the Grantor as trustee (and to the intent that the easements hereby granted shall be appurtenant to British Gas' gas undertaking and each and every part thereto) HEREBY GRANTS unto British Gas THE EASEMENTS to lay construct inspect maintain protect use replace remove or render unusable a pipeline for the transmission or storage of gas or other materials (whether such gas or materials are transmitted by British Gas on its own behalf or on behalf of other persons) and all necessary apparatus ancillary thereto (all hereinafter together called "the said Works") in upon and over strips of land twenty feet in width coloured pink for identification purposes only on the plan annexed hereto (hereinafter called "the said strips of land") and to pass over the said strips of land for the purposes of the said works and of any works of British Gas contiguous therewith and over the said land for the purpose of access to the said strips of land at all reasonable times and in an emergency at any time whether or not with workmen vehicles machinery and apparatus TO HOLD the same unto British Gas in fee simple

The said Deed also contains restrictive covenants by the grantor details of which are set out in the schedule of restrictive covenants hereto.

NOTE: Copy plan filed under ND120151.

- 26 Option to purchase affecting the land edged and numbered 2 in blue on the title plan and other land contained in an Agreement dated 15 February 1993 made between (1) John White and others and (2) Hassall Homes (Northumbria) Limited upon the terms and conditions therein mentioned.

NOTE: Copy filed under TY12502.

- 27 By a Transfer dated 3 October 1994 made between (1) William Scott Smith (Transferor) and (2) Newcastle United Football Company Limited (Transferees) the land edged and numbered 11 in blue on the title plan was conveyed subject as follows:-

"The property is transferred:

(i) Subject to the rights of the Local Authority of drains and sewers.

(ii) Subject to all rights of way water drainage watercourse light air and other easements and quasi or reputed easements rights of adjoining owners (if any) affecting the property and any liability to repair or contribute to the repair of roadways sewers drains gutters fences hedges and other like matters."

- 28 By a Transfer dated 3 October 1994 made between (1) William Scott Smith and Anthea Margaret Smith (Transferors) and (2) Newcastle United

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Football Company Limited (Transferees) the land edged and numbered 12 in blue on the title plan was conveyed subject as follows:-

"The property is transferred:

Subject to the rights of the Local Authority in respect of drains and sewers and to those of the Water Authority in respect of the Ouse Burn

Subject to all rights of way water drainage watercourse light air and other easements and quasi or reputed easements rights of adjoining owners (if any) affecting the property and any liability to repair or contribute to the repair of roadways sewers drains gutters fences hedges and other like matters."

- 29 A Conveyance of the land edged and numbered 19 in blue on the title plan dated 29 March 1996 made between (1) Robert Thompson and others (Vendors) and (2) Newcastle International Airport Limited (Purchaser) contains restrictive covenants.

NOTE 1: The Option Agreement dated 1 November 1991 and the Agreements dated 6 November 1992 and 26 September 1994 referred to do not necessitate additional entries on the register

NOTE 2: Copy filed under ND45984.

- 30 The Conveyance dated 29 March 1996 referred to above contains provisions relating to the payment of additional moneys as therein mentioned.
- 31 A Transfer of the land edged and numbered 3 and 4 in blue on the title plan dated 27 August 1997 made between (1) Christopher James Robson Hilton and others (Transferors) and (2) Newcastle International Airport Limited (Transferee) contains covenants details of which are set out in the schedule of restrictive covenants hereto.
- 32 The land is subject to the following rights reserved by the Transfer dated 27 August 1997 referred to above:-

"EXCEPT and RESERVED to the Transferors the right to enter upon the said land at all times between the date hereof and 31st October 1997 (both dates inclusive) with or without vehicles machinery or equipment for all purposes to do with the cultivation and harvesting of crops PROVIDED THAT in exercising this right the Transferors shall do as little damage as possible to the said land and shall make good all damage arising from the exercising of the same and shall indemnify the Transferee against all costs or actions arising therefrom"

- 33 The land is subject to the rights granted by a Deed of Grant dated 8 October 1997 made between (1) Newcastle International Airport Limited and (2) Prestwick Properties Limited.

NOTE: Copy filed under TY424276.

- 34 A Conveyance of the land edged and numbered 20, 21 and 22 in blue on the title plan dated 23 January 1998 made between (1) G C and V M Watson and Sons Limited and (2) Newcastle International Airport Limited contains restrictive covenants.

NOTE: Copy filed under ND105039.

- 35 The Conveyance dated 23 January 1998 referred to above contains provisions which relate to the payment of additional moneys as therein mentioned.
- 36 The land is subject to the rights reserved by the Conveyance dated 23 January 1998 referred to above.
- 37 A Transfer of the land edged and numbered 25 and 26 in blue on the title plan dated 23 March 1998 made between (1) Peter Thomas Morrison and (2) Newcastle International Airport Limited contains restrictive covenants.

NOTE: Copy filed under ND105308.

- 38 A Transfer which included the land edged and numbered 27 in blue on the



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title plan dated 4 December 1998 made between (1) Peter Thomas Morrison (Transferor) and (2) Newcastle International Airport Limited (Transferee) contains covenants details of which are set out in the schedule of restrictive covenants hereto.

- 39 The land is subject to the following rights reserved by the Transfer dated 4 December 1998 referred to above :-

"This Transfer excludes all (if any) rights advantages easements or quasi-easements whatsoever over through or otherwise affecting the Transferors adjoining or neighbouring land and Section 62 of The Law of Property Act 1925 shall not apply save that nothing herein contained shall remove or adversely affect the rights of the Buyer or its successors in title to use the existing field drains passing under or through the property and/or the adjoining or neighbouring land of the Transferor"

- 40 By a Deed dated 8 April 1999 made between (1) The Coal Authority and (2) Newcastle International Airport Limited the covenants contained in clauses 5 and 6 of the Fourth Schedule to the Conveyance dated 8 April 1982 referred to at entry 17 above were expressed to be released so far as they affect the land edged and numbered 4 in blue on the title plan. The said Deed also contains further covenants affecting the land edged and numbered 4 in blue on the title plan.

*NOTE: Copy filed under TY107669.*

- 41 By a Deed dated 8 April 1999 made between (1) Christopher James Robson Hilton and others and (2) Newcastle International Airport Limited the covenants contained in the Transfer dated 27 August 1997 referred to at entry 30 above were expressed to be released so far as they affect the land edged and numbered 4 in blue on the title plan. The said Deed also contains further covenants affecting the land edged and numbered 4 in blue on the title plan.

*NOTE: Copy filed under TY107669.*

- 42 A Transfer of the land edged and numbered 28 in blue on the title plan dated 19 December 2000 made between (1) Robert Thompson and others (Transferor) and (2) Newcastle International Airport Limited (Transferee) contains the following covenants:

"the Transferee hereby covenants with the Transferor that the Transferee will not use the Property or any part thereof for any purpose within Class C3 of the Town and Country Planning (Use Classes) Order 1987."

- 43 The land edged and numbered 1 and 2 in blue on the title plan is subject to the rights granted by a Deed of Grant dated 6 November 2003 made between (1) Newcastle International Airport Limited and (2) Transco PLC.

The said Deed also contains restrictive covenants by the grantor.

*NOTE: Copy filed under TY12502.*

- 44 (06.09.2005) Such parts of the land edged and numbered 15 in blue on the title plan as are affected thereby are subject to the rights granted by a Lease of Office 1 and Freight Module 25 in the Freight Agents Building dated 2 March 2005 made between (1) Newcastle International Airport Limited and (2) Kintetsu World Express (UK) Limited for a term of 3 years from 31 May 2005.

*NOTE: Copy filed.*

- 45 (14.02.2006) Such parts of the land edged and numbered 16 in brown on the title plan as are affected thereby are subject to the rights granted by a Lease of Room E0025 Level 0, Ticket Desks 1,2 and 3 Level 1 and Rooms E3018, E3019 and E3020 Level 3 Terminal Building dated 11 January 2005 made between (1) Newcastle International Airport Limited and (2) British Airways PLC for a term of 3 years from 1 April 2003.

*NOTE: Copy filed.*

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- 46 (14.02.2006) Such parts of the land edged and numbered 15 in brown on the title plan as are affected thereby are subject to the rights granted by a Lease of Unit 5 Airline Engineering Block dated 11 January 2005 made between (1) Newcastle International Airport Limited and (2) British Airways PLC for a term of 3 years from 1 April 2003.

*NOTE: Copy filed.*

- 47 (23.06.2006) By a Deed of Variation dated 19 May 2006 made between (1) Newcastle International Airport Limited and (2) Adelphi Grand Limited Liability Partnership the provisions contained in the Deed of Grant dated 13 August 1973 referred to above were expressed to be varied as therein mentioned.

*NOTE: Copy Deed of Variation filed.*

- 48 (23.06.2006) By a Deed of Surrender and Release dated 15 June 2006 made between (1) Newcastle International Airport Limited and (2) Adelphi Grand Limited Liability Partnership certain rights contained in the Deed of Grant dated 13 August 1973 were expressed to be surrendered and released as therein mentioned.

*NOTE: Copy Deed of Surrender and Release filed.*

- 49 (13.12.2006) The land is subject to the easements granted by a Lease dated 9 June 2006 of Rooms E00033-35, Level 0 Terminal Building for a term of 2 years from 12 March 2005.

*NOTE: Copy filed.*

- 50 (18.01.2007) UNILATERAL NOTICE in respect of two leases of ATM facilities both dated 22 September 2006 both made between (1) Newcastle International Airport Limited and (2) National Westminster Bank Plc.

- 51 (18.01.2007) BENEFICIARY: National Westminster Bank Plc of 135 Bishopsgate, London EC2N 3UR and care of Messrs Speechly Bircham LLP of 6 St Andrew Street, London EC4A 3LX (Reference: CDP/JWE/JDF/316588).

- 52 (14.06.2007) An Agreement dated 5 December 2006 made between (1) Northumbria Water Limited and (2) Newcastle International Airport Limited which relates to the diversion of a water main as therein mentioned.

*NOTE : Copy filed.*

- 53 (14.06.2007) The land is subject to the rights granted by a Deed of Grant dated 5 December 2006 made between (1) Newcastle International Airport Limited and (2) Northumbrian Water Limited.

The said Deed also contains restrictive covenants by the grantor.

*NOTE: Copy filed.*

- 54 (12.11.2007) UNILATERAL NOTICE in respect of a Lease dated 5 November 2007 made between (1) Newcastle International Airport Limited and (2) Journeys Friend Exports Limited for a term expiring on 31 December 2011.

- 55 (12.11.2007) BENEFICIARY: Journeys Friend Exports Limited of Prospect Place, 85 Great North Road, Hatfield, Hertfordshire AL9 5BS.

- 56 (18.01.2008) UNILATERAL NOTICE affecting the Gatehouse Building, Southside, Newcastle International Airport in respect of a Lease dated 11 December 2007 made between (1) Newcastle International Airport and (2) Royal Mail Group Limited from 1 June 2006 to 31 May 2011.

*NOTE: Copy filed.*

- 57 (18.01.2008) BENEFICIARY: Royal Mail Group Limited (Co. Regn. No 04138203) of 148 Old Street, London EC1V 9HQ.

- 58 (03.07.2008) The land is subject to the easements granted by a Lease dated 22 May 2008 of Rooms E3060-63 and E3049, Level 3 Terminal Building for a term from 7 April 2008 to 6 April 2010.

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*NOTE:- Copy filed.*

- 59 (12.08.2008) Contract affecting the land edged and numbered 16 in brown (part of) on the title plan dated 12 May 2008 in favour of Chisholm Bookmakers Limited.

*NOTE: Copy filed.*

- 60 (19.09.2008) The land is subject to the easements granted by a lease dated 11 September 2008 of Transit Unit No.1, Building No.1 for a term of 3 years from 7 February 2008.

*NOTE: Copy filed.*

- 61 (21.01.2009) The land is subject to the easements granted by a Lease dated 4 December 2008 of the Pier Room P0025, Level 0, Terminal Building, Newcastle International Airport for a term from 22 November 2008 to 21 November 2010.

*NOTE:- Copy filed.*

- 62 (05.10.2010) The parts of the land affected thereby are subject to the easements granted by the leases set out in the schedule of leases of easements hereto.

- 63 (10.11.2010) The land is subject to the easements granted by a lease dated 21 October 2010 of Rooms E3060-63 and E3049, Level 3, Terminal Building for a term of years from 7 April 2010 to 6 April 2012.

*NOTE: Copy filed.*

- 64 (17.01.2011) The land is subject to the rights granted by a Deed of Grant dated 10 January 2011 made between (1) Newcastle International Airport Limited and (2) Northumbrian Water Limited.

The said Deed also contains restrictive covenants by the grantor.

*NOTE: Copy filed.*

- 65 (20.01.2011) The land is subject to the rights granted by a Deed of Grant dated 11 January 2011 made between (1) Newcastle International Airport Limited and (2) Northumbrian Water Limited.

The said Deed also contains restrictive covenants by the grantor.

*NOTE: Copy filed.*

- 66 (28.07.2011) The land is subject to the easements granted by a lease dated 15 July 2011 of Warehouse 20, Freight Agents' Building 3, Airport Freightway for a term from and including 15 July 2011 to and including 14 July 2014.

*NOTE:- Copy filed.*

- 67 (01.08.2011) The land is subject for the term from and including 20 July 2011 to and including 19 July 2014 to the rights granted by a lease of Room G13, Ground Floor, Building 5, Airport Freightway, Newcastle International Airport made between (1) Newcastle International Airport Limited and (2) Concept Aero Limited.

*NOTE:-Copy filed.*

- 68 (25.08.2011) The Land is subject to the easements granted by a Lease of Rooms P0023 and P0024, Pier, Terminal Building dated 17 August 2011 for a term of years from 1 May 2011 to and including 30 April 2014.

*NOTE: Copy filed.*

- 69 (04.01.2012) The land is subject to the easements granted by a Lease dated 8 December 2011 of land at Newcastle International Airport, Woolsington made between (1) Newcastle International Airport Limited and (2) Journeys Friend Exports Limited for a term from and including 1 January 2012 to and including 31 December 2016.

*NOTE: Copy filed.*

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70 (21.03.2013) UNILATERAL NOTICE affecting the land edged and numbered 29 in mauve on the title plan in respect of an agreement relating to the installation of telecommunications equipment at Stand 14, Newcastle International Airport, Woolsington, Newcastle Upon Tyne dated 11 February 2013 and made between (1) Newcastle International Airport Limited (2) Everything Everywhere Limited and (3) Orange Personal Communications Services Limited.

71 (21.03.2013) BENEFICIARY: Everything Everywhere Limited (Co. Regn. No. 02382161) (for the attention of the Company Secretary) of Hatfield Business Park, Hatfield, Hertfordshire AL10 9BW.

72 (28.08.2013) The land is subject to the easements granted by a lease dated 16 August 2013 of Office 6 and Freight Module 21, Freight Agents' Building for a term from and including 16 November 2013 to and including 15 November 2019.

*NOTE: Copy filed.*

73 (05.09.2013) UNILATERAL NOTICE affecting Building 3, Southside, Newcastle International Airport, Woolsington NE13 8BH in respect of a lease dated 3 September 2013 made between (1) Newcastle International Airport Limited and (2) Airline Services Limited.

74 (05.09.2013) BENEFICIARY: Airline Services Limited (Co. Regn. No. 1685094) of Canberra House, Robeson Way, Sharston Green Business Park, Manchester M22 4SX.

75 (01.11.2013) The land is subject to the easements granted by a lease dated 14 October 2013 of Ticket Desk 30, Terminal Building for a term from and including 1 September 2013 to and including 31 August 2016.

*NOTE: Copy filed*

76 (01.11.2013) The land is subject to the easements granted by a lease dated 14 October 2013 of Rooms E3066-E3067, Level 3, Terminal Building for a term from and including 1 September 2013 to and including 31 August 2016.

*NOTE: Copy filed*

77 (01.11.2013) The land is subject to the easements granted by a lease dated 14 October 2013 of Room E0041, Level 0, Terminal Building for a term from and including 1 September 2013 to and including 31 August 2016.

*NOTE: Copy filed*

78 (08.11.2013) The land is subject to the easements granted by a lease dated 1 November 2013 of Building 1, Perimeter Road, Southside for a term from and including 28 August 2013 to and including 27 August 2016.

*NOTE: Copy filed.*

79 (27.02.2015) A Licence dated 25 February 2015 made between (1) Newcastle International Airport Limited and (2) Airwave Solutions Limited relates to an Agreement relating to a telecommunications site. The Agreement grants rights in Schedule 2 as therein mentioned.

*NOTE:-Copy filed.*

80 (14.03.2016) By a Deed dated 5 August 2015 made between (1) Newcastle International Airport Limited and (2) Minhoco 24 Limited the terms of the lease dated 11 March 2010 of Hilton Hotel referred to in the schedule of leases hereto were varied.

NOTE 1: The proprietor of the registered charge dated 4 December 2014 of the tenants title number TY490324 was not a party to the deed nor was evidence of its consent to the deed produced to the registrar.

*NOTE: Copy Deed filed.*

81 (21.07.2016) The land is subject to the easements granted by a lease of Unit 5 Airline Engineering Block dated 30 June 2016 made between (1) Newcastle International Airport Limited and (2) British Airways Plc for

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a term from and including 1 June 2016, to and including 31 May 2019.

*NOTE:-Copy filed.*

- 82 (19.10.2016) The land is subject to the easements granted by a lease of Building 1 dated 21 September 2016 made between (1) Newcastle International Airport Limited and (2) PCS Events Limited for a term from and including 28 August 2016 to and including 27 August 2018.

*NOTE:-Copy filed.*

- 83 (18.04.2017) UNILATERAL NOTICE affecting Room E0025, Level 0, Terminal Building in respect of a Lease dated 2 February 2017 made between (1) Newcastle International Airport Limited and (2) British Airways Plc.

*NOTE: Copy plan filed.*

- 84 (18.04.2017) BENEFICIARY: British Airways Plc (Co.Regn.No 01777777) of Waterside, PO Box 365, Harmondsworth, West Drayton UB7 0GB.

- 85 (16.05.2017) REGISTERED CHARGE contained in a Debenture dated 23 September 2016 affecting also other titles.

*NOTE: Charge reference ND96720.*

- 86 (30.07.2018) Proprietor: THE ROYAL BANK OF SCOTLAND PLC (Scot. Co. Regn. No. SC083026) of 250 Bishopsgate, London EC2M 4AA.

- 87 (16.05.2017) The proprietor of the Charge dated 23 September 2016 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.

- 88 (16.05.2017) UNILATERAL NOTICE affecting Unit 6, Building 2, Freight Village in respect of a Lease dated 31 March 2017 made between (1) Newcastle International Airport Limited and (2) Amitex LED Lighting Company Limited for a term from and including 31 March 2017 to and including 30 March 2022.

*NOTE: Copy filed.*

- 89 (16.05.2017) BENEFICIARY: Amitex LED Lighting Company Limited (Co. Regn. No. 04678268) of Unit 6, Building 2, Freight Village, Newcastle International Airport, Woolsington NE13 8BH.

- 90 (18.10.2017) UNILATERAL NOTICE in respect of legal easements contained in clause 4 of a Telecoms Rights Agreement dated 1 September 2017.

- 91 (18.10.2017) BENEFICIARY: Shared Access LTD (Co. Regn. No. 06345316) of Law Office, Wharfe House, Wharfe Bank Business Centre, Ilkley Road, Otley, West Yorkshire LS21 3JP.

- 92 (08.08.2018) The land is subject to the easements granted by a lease of Rooms E3025 to E3030, Level 3, Terminal Building, Newcastle International Airport dated 24 July 2018 made between (1) Newcastle International Airport Limited and (2) Thomas Cook Airlines Limited for a term from 1 July 2018 to 30 June 2022.

*NOTE:-Copy filed.*

- 93 (21.08.2018) The parts of the land affected thereby are subject to the rights granted by a Lease of Rooms P0023 and P0024, Pier, Terminal Building dated 9 August 2018 referred to in the schedule of leases hereto.

*NOTE: Copy lease filed.*

- 94 (07.11.2018) The land is subject to the easements granted by a lease of rooms E1046, E1047, E1048, E1049, E1050 and E1053, Level 1, Terminal Building dated 4 September 2018 made between (1) Newcastle International Airport Limited and (2) British Airways Plc for a term of years commencing on 1 January 2018 to and including 31 December 2020.

*NOTE: Copy filed.*

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- 95 (08.01.2019) The parts of the land affected thereby are subject to the rights granted by a Lease of General Aviation Terminal, Perimeter Road, Southside dated 2 January 2019 made between (1) Newcastle International Airport Limited and (2) Samson Aviation Services Limited for a term from and including 1 July 2018 to and including 30 June 2023.

*NOTE: Copy filed.*

- 96 (09.01.2019) UNILATERAL NOTICE affecting the land edged red on plan 1 and edged green on plan 2 in respect of a Phase Development Agreement dated 21 December 2018 made between (1) Newcastle International Airport Limited (2) Tynexe Commercial Limited (3) Bellway Homes Limited (4) Bellway Plc and (5) The Council of the City of Newcastle upon Tyne..

*NOTE: Copy plans 1 and 2 filed.*

- 97 (09.01.2019) BENEFICIARY: Bellway Homes Limited (Co. Regn. No. 00670176) of Seaton Burn House, Dudley Lane, Seaton Burn, Newcastle upon Tyne NE13 6BE.

- 98 (05.06.2019) The land is subject to the easements granted by a lease of Room E1010a, Level 1, Terminal Building dated 7 May 2019 made between (1) Newcastle International Airport Limited and (2) Swissport GB Limited for a term of years from and including 1 April 2019 to and including 31 March 2022.

*NOTE: Copy filed.*

- 99 (05.06.2019) The land is subject to the easements granted by a lease of Rooms E1067-68 and E1070, Level 1, Terminal Building dated 31 May 2019 made between (1) Newcastle International Airport Limited and (2) Swissport GB Limited for a term from and including 1 May 2019 to and including 30 April 2022.

*NOTE:-Copy filed.*

- 100 (05.06.2019) The land is subject to the easements granted by a lease of Land to place a de-icing tank at Newcastle International Airport dated 7 May 2019 made between (1) Newcastle International Airport Limited and (2) Swissport GB Limited for a term from and including 7 October 2018 to and including 6 October 2021.

*NOTE:-Copy filed.*

- 101 (05.06.2019) The land is subject to the easements granted by a lease of Land to place a de-icing tank at Newcastle International Airport dated 7 May 2019 made between (1) Newcastle International Airport Limited and (2) Swissport GB Limited for a term from and including 13 October 2017 to and including 12 October 2020.

*NOTE:-Copy filed.*

- 102 (29.07.2019) The land is subject to the easements granted by a lease of Room E3054, Level 3, Terminal Building, Newcastle International Airport dated 16 July 2019 made between (1) Newcastle International Airport Limited and (2) Swissport GB Limited for a term of 3 years from and including 5 May 2018.

*NOTE: Copy filed.*

- 103 (30.07.2019) The lease of Phase 1, Newcastle International Airport Business Park, (Site B,) South Side dated 3 July 2019 made between (1) Newcastle International Airport Limited (2) Tynexe Commercial Limited and (3) The Council of the City of Newcastle upon Tyne referred to in the schedule of leases hereto contains restrictive covenants by the landlord.

- 104 (30.07.2019) The land is subject to the easements granted by a lease a De-icing Tank Compound dated 16 July 2019 made between (1) Newcastle International Airport Limited and (2) Swissport GB Limited for a term of from and including 7 October 2018 to and including 6 October 2021.

*NOTE: Copy filed.*

- 105 (05.12.2019) Agreement for lease affecting the land edged and numbered

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31 in brown on the title plan dated 3 July 2019 in favour of Bellway Homes Limited.

*NOTE:-Copy filed.*

- 106 (10.06.2020) The lease of an Electricity substation dated 10 June 2020 made between (1) Newcastle International Airport Limited (2) Tynexe Commercial Limited (3) The Council Of The City Of Newcastle Upon Tyne (4) Bellway Homes Limited and (5) Northern Powergrid (Northeast) PLC referred to in the schedule of leases hereto contains restrictive covenants by the landlord.
- 107 (23.11.2022) The land is subject to the easements granted by a lease of an electricity substation, Airview Park dated 21 November 2022 made between (1) Tynexe Commercial Limited and (2) Northern Powergrid (Northeast) plc for a term of 60 years commencing on 21 November 2022.

*NOTE: Copy filed under TY593477.*

- 108 (21.02.2023) By a Deed dated 31 January 2023 made between (1) The Coal Authority and (2) Newcastle International Airport Limited the covenants contained in paragraphs 5 & 6 of the fourth schedule of the Conveyance dated 8 April 1982 referred to above were expressed to be varied in relation to the part of the land edged and numbered 3 in blue on the title plan.

*NOTE: Copy filed.*

- 109 (02.03.2023) The land is subject to the easements granted by a lease of Unit 5 Airline Engineering Block dated 19 January 2023 made between (1) Newcastle International Airport Limited and (2) British Airways Plc for a term of of years from and including 1 June 2022 to and including 31 May 2025.

*NOTE: Copy filed.*

## Schedule of restrictive covenants

- 1 The following are details of the covenants contained in the Conveyance dated 19 September 1924 referred to in the Charges Register:-

COVENANT by the Company for itself and its successors and assigns with the Vendors and as a separate covenant with each of them their and each of their heirs and assigns that

no bricks or tiles should at any time be made or burnt on the hereditaments thereby assured or any part thereof and no operative machinery should at any time be fixed or set thereon or in any buildings to be erected thereon as no manufacturer or operation of the noisome offensive dangerous or noisy kind should be carried on in or upon the same nor should anything be done thereon which might be or grow to be a nuisance or annoyance to the Vendors or the tenants or the neighbourhood and (c) for the purpose of insuring that the covenants lastly thereinbefore contained by the Company should continue to run with and bind the hereditaments premises thereby assured the Company its successors and assigns would upon every Conveyance Lease or other assurance of the same premises or any part thereof give to the Purchaser Lessee or Grantee express notice of that covenant.

- 2 The following are details of the covenants contained in the Deed dated 19 May 1975 referred to in the Charges Register:-

"THE First Party hereby covenants with the Second Party that

(a) Within twelve months from the date hereof at their own expense and in proper and workmanlike manner and to the satisfaction in all respects of the Surveyor for the time being of the Second Party to erect and make and thereafter maintain and keep in good repair a stock proof boundary fence around and between the points A B and C along the southern and eastern boundaries of field OS6580.

(b) For the benefit of the adjoining land of the Second Party and every part thereof and so as to bind as far as practicable the land comprised

## Schedule of restrictive covenants continued

in the Second Schedule no part thereof shall be used for any purpose other than agriculture or horticulture provided that this shall not prohibit the erection of a dwellinghouse in field OS9976 to be used for agricultural purposes only and in conjunction with the land described in the Second Schedule hereto

THE said Barbara Ellen White with the intent so as to bind (so far as practicable) the said land coloured yellow on the plan numbered 1 annexed hereto into whosoever hands the same may come and to the benefit and protection of the adjoining land coloured round with blue on the plan numbered 1 annexed hereto and conveyed to the Second Party hereby covenants with the Second Party that she will not for a period of three years from the date hereof use or permit to be used the said piece of land other than as garden ground appurtenant to her adjoining dwellinghouse and that no building of any description will be erected thereon

NOTE: The points A B and C referred to are reproduced in blue on the title plan.

- 3 (06.06.2005) The following are details of the covenants contained in the Conveyance dated 14 June 1983 referred to in the Charges Register:-

"THE Purchaser to the intent and so as to bind (so far as practicable) the Conveyed Land and any part or parts thereof into whosoever hands the same may come and to benefit and protect any mines and minerals in which the Coal Board have any interest and which provide subjacent or lateral support for the Conveyed Land or any part or parts thereof and any adjoining or neighbouring land belonging to the Coal Board or the Company and every part thereof or any part or parts thereof which is or are capable of being benefited hereby covenants with the Coal Board and the Company respectively that the Purchaser will at all times hereafter perform and observe the restrictions and stipulations contained in the Fourth Schedule to this Conveyance

### THE FOURTH SCHEDULE

#### Restrictions and Stipulations

1. Not to use or permit to be used the Conveyed Land or any part or parts thereof for any purposes other than as:-

(a) agriculture and

(b) grazing

or either of them

2. No building structure or works shall at any time be erected constructed placed or laid on or in the Conveyed land or any part or parts thereof except such building structure or works to be used in connection with or ancillary to the purposes mentioned in Paragraph 1 of this Schedule

3. Subject to the provisions of Paragraph 2 of this Schedule no building structure or works shall at any time be erected constructed placed or laid on or in the Conveyed Land or any part or parts thereof and no renewal or enlargement of or alteration to any building structure or works for the time being on or in the Conveyed Land shall at any time be carried out except in accordance with plans and specifications previously approved in writing by the Coal Board but such approval shall not be withheld unless the design or layout of such building structure or works or of any renewal or enlargement thereof or any alteration thereto or unless the method of erecting constructing placing laying renewing enlarging or altering such building structure or works or unless the materials to be used in connection therewith do not conform respectively to the reasonable requirements of the coal Board for minimising damage caused by subsidence Provided that if any dispute shall arise between the Coal Board and the Purchaser or any successor in title of the Purchaser as to whether such approval as aforesaid has been properly withheld such dispute shall in default of agreement be referred to the arbitration of a single arbitrator appointed by the Coal Board and the Purchaser or their successors in



## Schedule of restrictive covenants continued

title or in default of agreement on such appointment of two arbitrators one to be appointed by each of them the Coal Board and the Purchaser or their successors in title subject to and in accordance with the provisions of the Arbitration Act 1950 or any statutory modification or re-enactment thereof for the time being in force"

- 4 The following are details of the covenants contained in the Deed dated 14 January 1993 referred to in the Charges Register:-

THE Grantor (to the intent and so as to bind the said land and land of the Grantor adjoining thereto and every part thereof into whosoever hands the same may come and to benefit and protect the easements hereby granted) hereby covenants with British Gas as follows:

(i) The Grantor shall not do or cause or permit to be done on the said land or land of the Grantor adjoining thereto anything calculated or likely to cause damage or injury to the said works and will take all reasonable precautions to prevent such damage or injury

(ii) The Grantor shall not without the prior consent in writing of British Gas make or cause or permit to be made any material alteration to or cause or permit to be made any material alteration to or any deposit of any thing upon any part of the said strips of land so as to interfere with or obstruct the access thereto or to the said works by British Gas or so as to lessen or in any way interfere with the support afforded to the said works by the surrounding soil including minerals or so as materially to reduce the depth of soil above the said works

(iii) The Grantor shall not erect or install or cause or permit to be erected or installed any building or structure or permanent apparatus in through upon or over the said strips of land.

- 5 (06.06.2005) The following are details of the covenants contained in the Transfer dated 27 August 1997 referred to in the Charges Register:-

"3. The Transferee hereby covenants with the Transferors for the benefit of any other land belonging to the Transferors and forming part of the estate of the late Daleus Joan Vipond and every part of it and so as to bind (so far as practicable) the land comprised in this Transfer and each and every part of it that the Transferee will comply with the following covenants and stipulations:-

(a) not to use any land comprised in this Transfer other than for the purposes of agriculture (as defined in the Agricultural Tenancies Act 1995)

(b) not to erect construct place or lay any building structure or works on the land comprised in this Transfer or any part thereof other than buildings structures or works ancillary to the purpose of agriculture (as defined in the Agricultural Tenancies Act 1995)

(c) not to make any application (whether to the Lands Tribunal or otherwise) for any order releasing varying or modifying the covenants contained in this clause

(d) not to dispose of any estate or interest in all or any part of the land comprised in this Transfer except to a person who has first entered into a Deed of Covenant with the Transferors or their successors in title or assigns to the same effect as this clause"

- 6 (06.06.2005) The following are details of the covenants contained in the Transfer dated 4 December 1998 referred to in the Charges Register:-

"The Transferee hereby covenants with the Transferor so as to bind so far as possible the Property into whosoever hands it may come and for the benefit of so much of the property belonging to the Transferor as adjoins or is in the neighbourhood of the Property at the date hereof (including the remainder of the property comprised within the said Title Number ND68192) and each and every part thereof that it the Transferee and all persons deriving title under it shall observe and perform at all times hereafter the following restrictions covenants and stipulations:-

## Schedule of restrictive covenants continued

(a) not to use the property or permit the property or any part thereof to be used for any purpose other than for the surface parking of motor vehicles or associated internal roadways drainage and landscaping

(b) not to build erect or place any structure or building of any kind on the Property or develop the same in any way save always that nothing shall prevent the laying of a hard surface for parking with associated internal roadways ancillary drainage and associated landscaping works or the building erection or placing of any single storey structure or building in connection with the said surface car parking or internal roadways

The Transferee hereby covenants with the Transferor as follows:-

(a) that within three months of the date of this Transfer it will erect and thereafter maintain to the reasonable satisfaction of the Transferor a good and substantial stockproof fence along the boundary of the Property and the Transferor's retained land between the points marked "A" and "B" on the said plan annexed hereto

(b) that it will ensure that upon receiving a written request from the Transferor's successors in title the owner or owners for the time being of the Transferor's retained land (being the whole or any part or parts of the land remaining in title number ND68192 after this sale of the Property) ("the Owner") the Transferee and/or its successors in title to the Property or any part or parts thereof will covenant in terms reasonably acceptable to the Owner directly with the Owner to observe and perform the covenants set out in clauses 4(a) and (b) hereinabove and to pay and indemnify the Transferor and the Owner against all reasonable legal costs incurred in settling and completing such deed of covenant.

(c) neither the Transferee nor any successor in title of the Transferee shall apply to the Lands Tribunal or any other body for an order releasing varying or modifying the said restrictions and covenants detailed hereinabove".

NOTE: The points marked A and B referred to affect the northern boundary of the land in this title.

## Schedule of leases of easements

- 1 Benefiting land : Room P0012B, Level 0, Terminal Building  
Date of lease : 13 September 2010  
Term of lease : 3 years from 1.9.2010  
Registration date: 05.10.2010  
NOTE: Copy filed
- 2 Benefiting land : Cabin 9, Part A, Terminal Building  
Date of lease : 3 December 2010  
Term of lease : From and including 01.07.2010 to and including 30.06.2013  
Registration date: 13.12.2010  
NOTE: Copy filed
- 3 Benefiting land : edged and numbered 6 in brown  
Date of lease : 3 December 2010  
Term of lease : From 20.1.2010 to 19.1.2016  
Registration date: 18.01.2011
- 4 Benefiting land : Office 36 and Freight Modules 27 and 28  
Title Number of benefiting land : NOT REGISTERED  
Date of lease : 11 January 2011  
Term of lease : from 24 December 2010 to 23 December 2015  
Registration date: 15.02.2011  
NOTE: Copy filed
- 5 Benefiting land : Rooms E3043 - E3045, Level 3, Terminal Building  
Title Number of benefiting land : NOT REGISTERED  
Date of lease : 24 August 2011

## Schedule of leases of easements continued

Term of lease : From 13 June 2011 to 12 June 2014  
 Registration date: 25.10.2011  
 NOTE: Copy filed

6 Benefiting land : Room P0026, Level 0, Terminal Building  
 Title Number of  
 benefiting land : NOT REGISTERED  
 Date of lease : 24 August 2011  
 Term of lease : From 7 May 2011 to 6 May 2014  
 Registration date: 25.10.2011  
 NOTE: Copy Filed

## Schedule of notices of leases

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	04.04.1996 edged and numbered 2 in brown	land and buildings lying to the northeast of Middle Drive, Woolsington	17.09.1987 25 years from 8.11.1982	TY318856
2	02.04.1992 edged and numbered 3 in brown	Electricity Substation site, Mitford House	24.03.1992 60 years from 1.03.1992	ND75904
3	21.09.1992 edged and numbered 4 in brown	The Metro Sation, Newcastle Airport	25.08.1992 999 years from 17.11.1991	ND78236
4	24.03.1987 edged and numbered 1 in brown	land and buildings at Newcastle Airport	30.01.1997 50 years from 3.03.1986	TY187629
5	20.11.1997 edged and numbered 5 in brown	land and buildings lying to the East of A696, Woolsington	22.10.1997 125 years from 22.10.1997	TY336596
6	03.10.2001 edged and numbered 6 in brown	Electricity Substation site at Freight Village, Woolsington	19.09.2001 60 years from 01.01.1995	TY379810
7	13.05.2003 edged and numbered 7 in brown	Electricity Substation site at Newcastle Airport	24.04.2003 60 years from 24.04.2003	TY399957
8	22.09.2005 edged and numbered 8 in brown	Helicopter Accommodation, Newcastle International Airport	05.11.1992 30 years from and including 1.11.1992	TY437931
9	17.10.2005 edged and numbered 9 in brown (part of)	Office 4 and Freight Module 22 (ground floors)	10.10.2005 3 years from 1.3.2005	
NOTE: No copy of the Lease referred to is held by HM Land Registry.				
10	10.10.2006 Edged and numbered 17 in brown	Land on the north side of Coach Lane, Hazlerigg	03.10.2006 From 16.07.2006 to 17.07.2011	
11	26.02.2007 Edged and numbered 15 in	Unit 5 Airline Engineering Block	05.01.2007 From 01/06/2006 to	

## Schedule of notices of leases continued

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
	brown (part of)		31/05/2009	
12	26.02.2007 Edged and numbered 16 in brown (part of)	Room E0025 Level 0, Ticket Desks, 1, 2 and 3 and Rooms E3018, E3019 and E3020 Level 3 Terminal Building	05.01.2007 From 01/06/2006 to 31/05/2009	
13	02.05.2007 Edged and numbered 16 in brown (part of)	Rooms E3055-3059, Level 3 Terminal Building	23.04.2007 From 19/04/2007 to 18/04/2010	
14	13.08.2007 16 in brown (part of)	Rooms E1046, E1047, E1048, E1049, E1050 and E1053, Level 1 Terminal Building	13.06.2007 From 14 June 2007 to 13 June 2010	
15	23.11.2007 Edged and numbered 9 in brown (part of)	Office 6 and Freight Module 21 in the Freight Agents Building	16.11.2007 From 16/11/2007 to 15/11/2013	
16	28.11.2007 edged and numbered 16 in brown (part of)	Rooms E1069 and E1071, Level 1, Terminal Building	16.11.2007 From 01/09/2007 to 30/06/2010	
17	28.11.2007 edged and numbered 16 in brown (part of)	Ticket Desks 6, 7, 8 and 9 together with ancillary accomodation, Level 1, Terminal Building	16.11.2007 From 01/09/2007 to 30/06/2010	
18	29.11.2007 Edged and numbered 21 in brown (part of)	Unit 6, Building 2, Freight Village	27.09.2007 04/08/2007 to 03/08/2012	
19	03.12.2007 Edged and numbered 9 in brown (part of)	Office 37 and Freight Modules 14 and 15 in the Freight Agents Building	06.11.2007 From 01/11/2007 to 31/10/2010	
20	11.12.2007 Edged and no'd 21 in brown (part of)	Unit 4, Freight Building 2	10.10.2007 from 25.9.2006 until 24.9.2012	
21	05.12.2007 16 in Brown (Part of)	Ticket Desk in the Terminal Building	19.10.2007 From 01/09/2007 to 31/08/2010	
22	12.12.2007 16 in Brown (Part of)	Rooms E0041, Level 0, Terminal Building	19.10.2007 From 01/09/2007 to 31/08/2010	
23	12.12.2007 16 in Brown (Part of)	Room P0012B, Level 0, Terminal Building	19.10.2007 From 01/09/2007 to 31/08/2010	
24	10.03.2008	Rooms E0025, Level 0,	13.09.2007	

# Schedule of notices of leases continued

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
	Edged and numbered 16 in brown (part of)	Terminal Building	From 01/10/2007 to 30/09/2010	
25	10.03.2008 Edged and numbered 16 in brown (part of)	Rooms E3018, E3019 and E3020, Level 3, Terminal Building	13.09.2007 From 01/10/2007 to 30/09/2010	
26	02.05.2008 Edged and numbered 16 in brown (part of)	Rooms E3050, E3051, E3052, E3053 and E3054, Level 3, Terminal Building	24.04.2008 From 01/07/2007 to 30/06/2010	
27	02.05.2008 Edged and numbered 16 in brown (part of)	Rooms E3042, Level 3, Terminal Building	24.04.2008 From 01/09/2007 to 30/06/2010	
28	18.06.2008 Edged and numbered 16 in Brown (part of)	Rooms E3043-45, Level 3 Terminal Building	13.06.2008 From 13/06/2008 to 12/06/2011	
29	20.06.2008 Edged and numbered 16 in brown (part of)	Room P0026, Level 0 Terminal Building	07.05.2008 From 07/05/2008 to 06/05/2011	
30	20.06.2008 Edged and numbered 16 in brown (part of)	Business Lounge, Level 1 Terminal Building	05.06.2008 From 15/05/2008 to 14/05/2011	
31	06.11.2008 Edged and numbered 22 in brown	Land at South Side	16.10.2008 from and including 19 November 2007 to and including 18 November 2047	TY475190
32	20.01.2009 edged and numbered 23 in brown	Building 3, Southside	16.12.2008 From 01/03/2008 to 28/02/2013	
33	12.08.2009 edged and numbered 18 (part of), 19, 20 and 24 in brown	Refuelling Service Area	22.07.2009 From 03.06.2009 to 02.06.2108 inclusive	TY482887
	NOTE: See entry in the Charges Register relating to landlord's restrictive covenants.			
34	15.03.2010 edged and numbered 9 in brown (part of)	Freight module 25, building 3 freight Village (ground floor only)	02.03.2010 3 years from and including 2 March 2010	
35	24.06.2010 edged and	Hotel premises at Newcastle International Airport	11.03.2010 99 years from	TY490324

## Schedule of notices of leases continued

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
	numbered 10 in brown and 25 in brown on the title plan NOTE: See entry in the Charges Register relating to a Deed of variation dated 5 August 2015.		11.3.2010	
36	14.09.2010 edged and numbered 16 in brown (part of)	Ticket Desk 6, Level 1, Terminal Building	06.09.2010 from and including 01/07/2010 to and including 30/06/2013	
37	14.09.2010 edged and numbered 16 in brown (part of)	Rooms E1069 and E1071, Level 1, Terminal Building	06.09.2010 from and including 01/07/2010 to and including 30/06/2013	
38	28.11.2011 edged and numbered 27 in brown	Gatehouse Building	23.11.2011 from and including 1.6.2011 to and including 31.5.2016	
39	28.11.2012 edged and numbered 9 in brown (part of)	Office 7 and 8 Freight Agents Building 3 (ground floor)	01.11.2012 from and including 01/11/2012 to and including 31/10/2017	
40	17.10.2013 edged and numbered 28 in brown	Jet2.com site southside	23.09.2013 from and including 25.1.2013 to and including 24.1.2016	
41	21.11.2014 Tinted blue	Land on West side of Brunton Lane	04.11.2014 From 1.9.2013 and expiring on 30.9.2022	TY523208
42	04.03.2015 edged and numbered 29 in brown	Newcastle Aviation Academy	20.02.2015 From and including 1.12.2013 to and including 30.6.2022	TY525890
43	04.09.2015 edged and numbered 30 in brown	Transit Unit 2, Building 1, Freight Village	13.08.2015 from and including 18.12.2014 to and including 17.12.2019	
44	15.03.2016 Edged and numbered 16 in brown (part of)	Ticket Desk 30, Level 1, Terminal Building	24.02.2016 From and including 01/09/2016 To and including 31/08/2021	
45	16.03.2016 Edged and	Room E0041 Level 0 Terminal Building	24.02.2016 From and	

# Schedule of notices of leases continued

	Registration date and plan ref. numbered 16 in brown (part of)	Property description	Date of lease and term	Lessee's title
46	21.08.2018	Rooms P0023 and P0024, Pier, Terminal Building	including 01/09/2016 to and including 31/08/2021  09.08.2018 From and including 9 May 2018 to and including 8 May 2021	
47	23.10.2018 Edged and numbered 21 in brown (part of)	Transit Units 4 & 5 Transit Building 2	01.10.2018 From and including 1 October 2018 to and including 31 December 2026	TY560540
48	08.01.2019	General Aviation Terminal, Perimeter Road, Southside	02.01.2019 From and including 1 July 2018 to and including 30 June 2023	
49	30.07.2019 Edged and numbered 31 in brown	Phase 1, Newcastle International Airport Business Park, (Site B), South Side	03.07.2019 125 years from and including 3 July 2019 to and including 2 July 2144	TY567901
NOTE: See entry in the Charges Register relating to landlord's restrictive covenants.				
50	13.12.2019	Room E1113, Level 1, Terminal Building	04.12.2019 From and including 6 April 2018 To and including 5 April 2022	
51	10.06.2020 edged and numbered 32 in brown	Electricity substation, B6918, Woolsington	10.06.2020 60 years commencing on 10 June 2020	TY574523
NOTE: See entry in the Charges Register relating to landlords restrictive covenants.				
52	11.10.2021 Edged and numbered 16 in brown (part of)	Rooms E3066-E3067 Level 3 Terminal Building	20.09.2021 From and including 1 September 2021 to and including 31 August 2026	
53	09.11.2021	Transit Unit 1, Building 1, Freight Village	30.09.2021 From and including 30.9.2021 to and including 29.9.2026	
54	02.12.2021	Rooms E3009, E3010, E3011 and E3012, Level 3, Terminal Building	27.10.2021 5 years from and including 01.11.2019 to and including	

Schedule of notices of leases continued

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
			31.10.2024	
55	02.12.2021	Unit 4 Airline Engineering Block	27.10.2021 5 years from and including 01.11.2019 to and including 31.10.2024	
56	12.04.2022 Edged and numbered 33 in brown	Phase 2	16.02.2022 125 years from and including 16 February 2022	TY593061

End of register



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 PROTEST 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 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 PROTEST 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 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 PROTEST 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 ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

AW8

This is the exhibit marked “AW8” in the witness statement of Alexander James Wright.

- # ORBITAL WITNESS

HB-502

**HB-502**

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 PROTEST 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 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 PROTEST 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 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 PROTEST 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 ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants






AW9

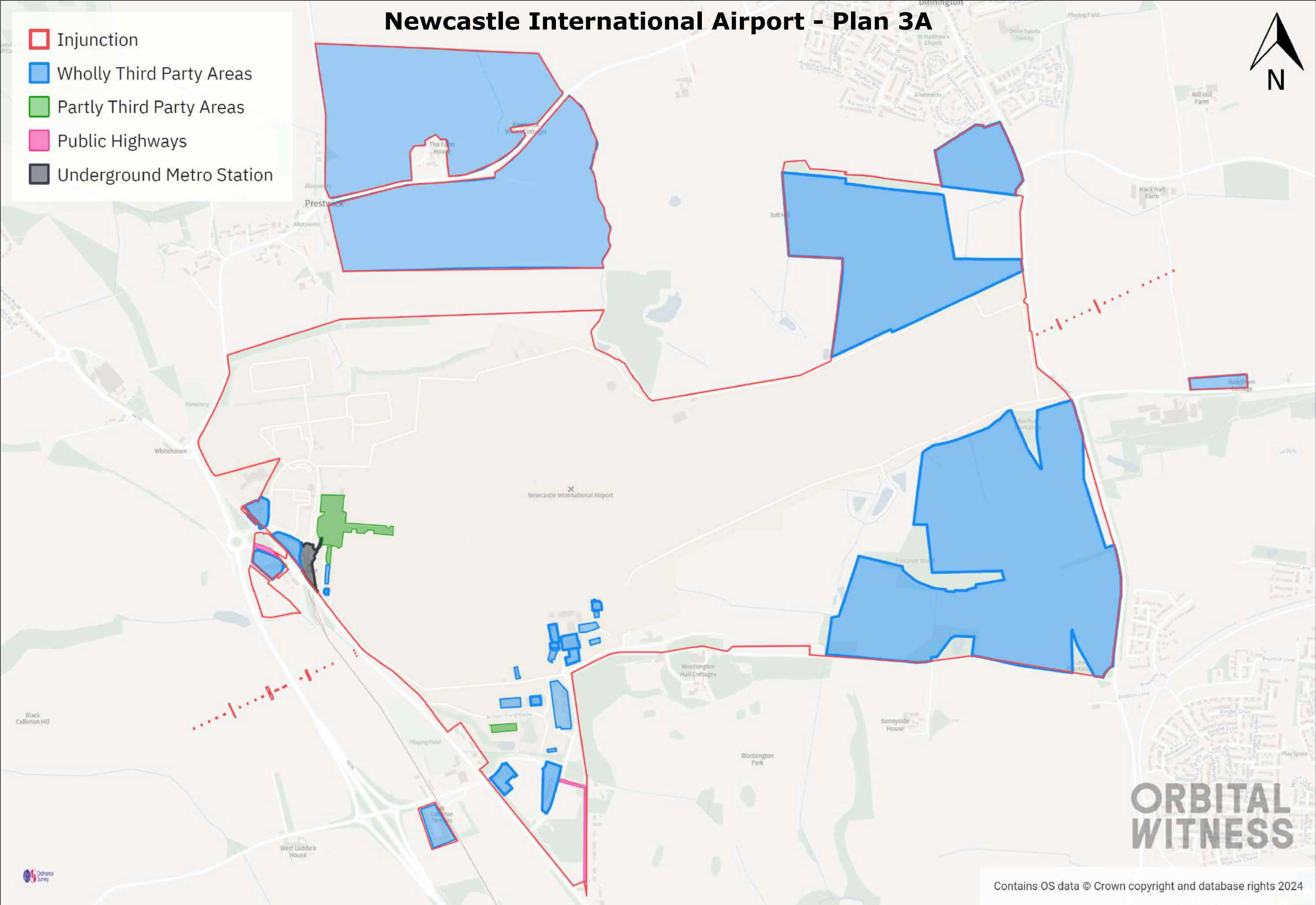
This is the exhibit marked “AW9” in the witness statement of Alexander James Wright.



# Newcastle International Airport - Plan 3A



-  Injunction
-  Wholly Third Party Areas
-  Partly Third Party Areas
-  Public Highways
-  Underground Metro Station



**ORBITAL  
WITNESS**

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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-

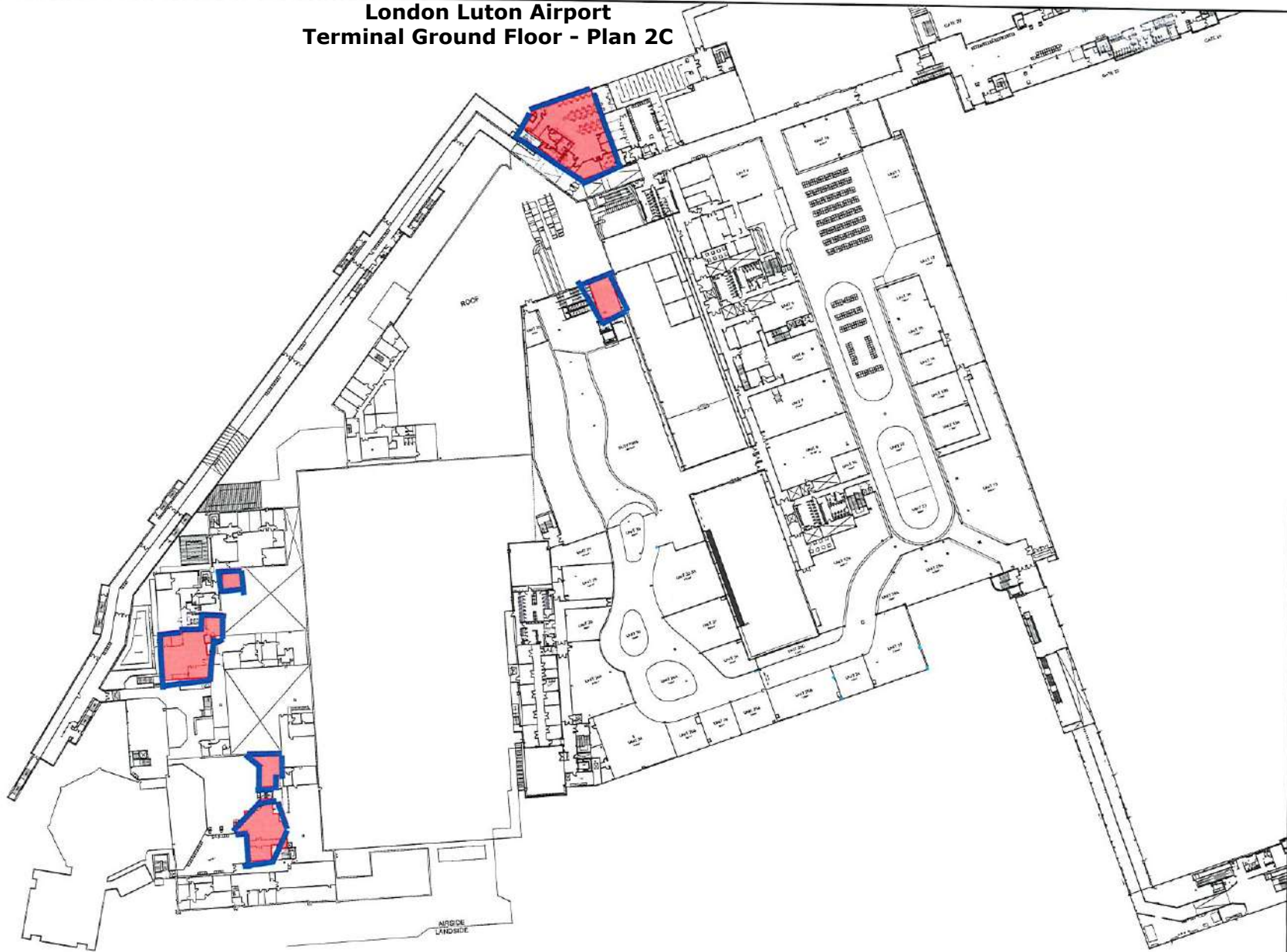
- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)
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Defendants

AW10

This is the exhibit marked “AW10” in the witness statement of Alexander James Wright.

London Luton Airport  
Terminal Ground Floor - Plan 2C



London Luton Airport

Rev	Date	Revision Note

Project Title:  
LONDON LUTON AIRPORT

Drawing Title:  
TERMINAL - GROUND FLOOR

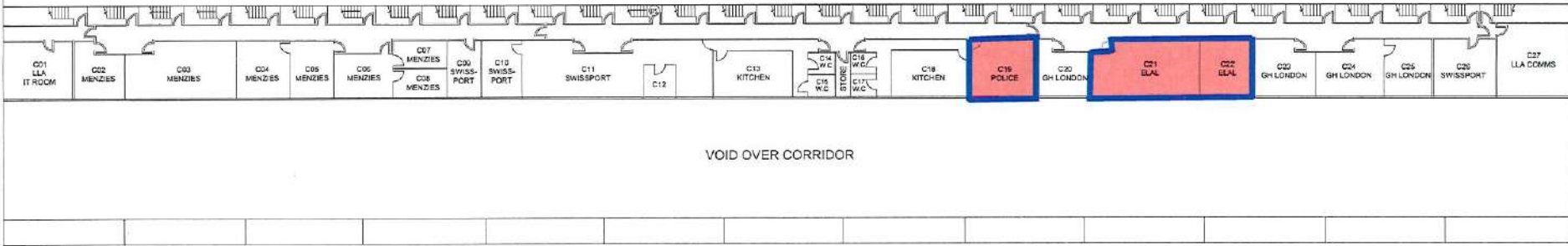
Status: INFORMATION		
Scale @A3: NTS	Date Created: 11/07/2024	Sheet: 1 of 1
Drawing Number: LTN-TRML005-C-001		Revision: 000

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London Luton Airport  
Terminal Ground Floor Mezz - Plan 2D

VOID OVER GROUND FLOOR CONCOURSE AND RETAIL AREA



VOID OVER CORRIDOR



London Luton Airport

Rev	Date	Revision Note

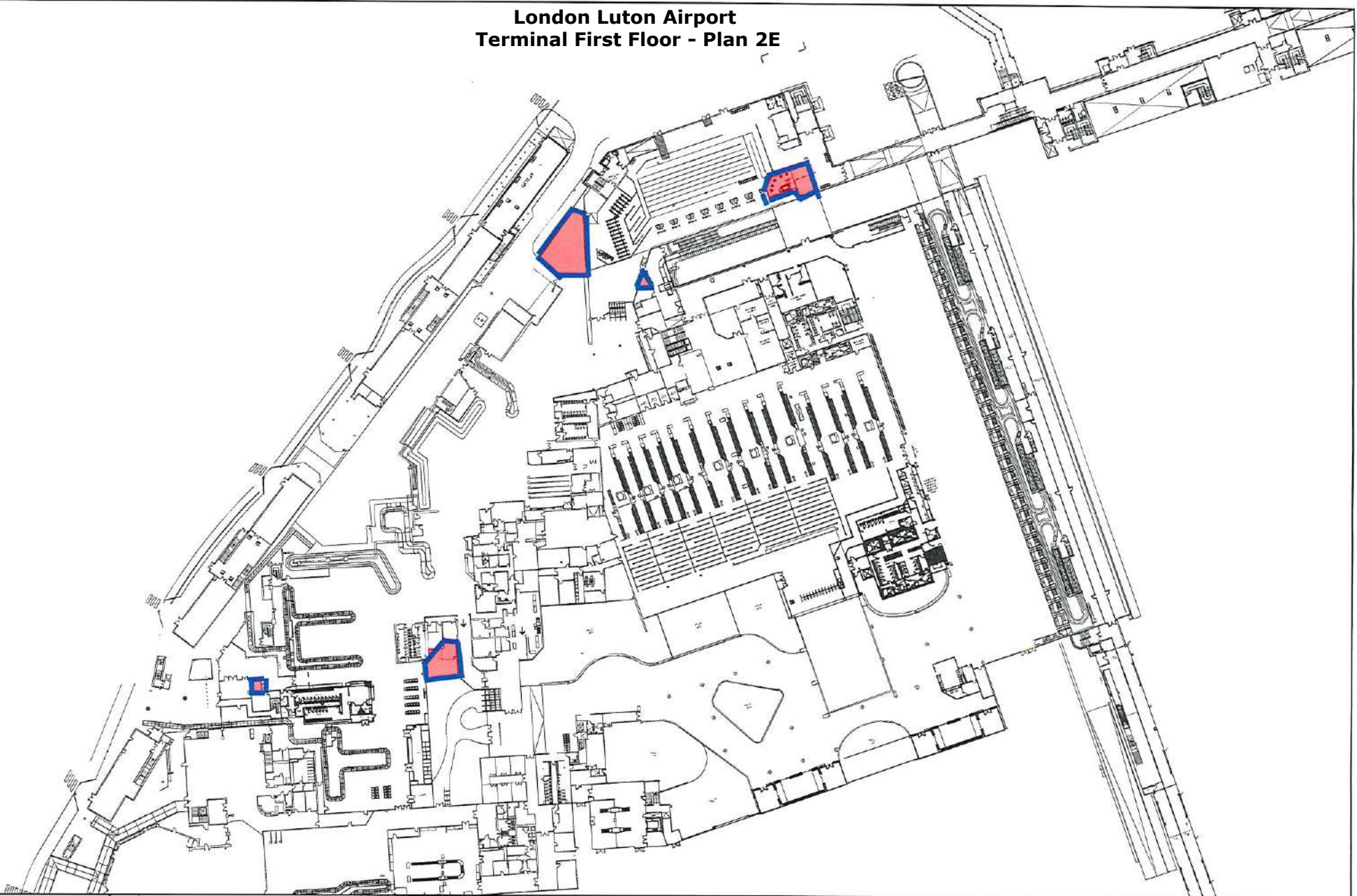
Project Title: LONDON LUTON AIRPORT

Drawing Title: TERMINAL - GROUND FLOOR MEZZANINE

Status: INFORMATION		
Scale @A3: NTS	Date Created: 18/05/2023	Sheet: 1 of 1
Drawing Number: LTN-TRML006-C-002	Revision: 000	

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London Luton Airport  
Terminal First Floor - Plan 2E



London Luton Airport

Rev	Date	Revision Note

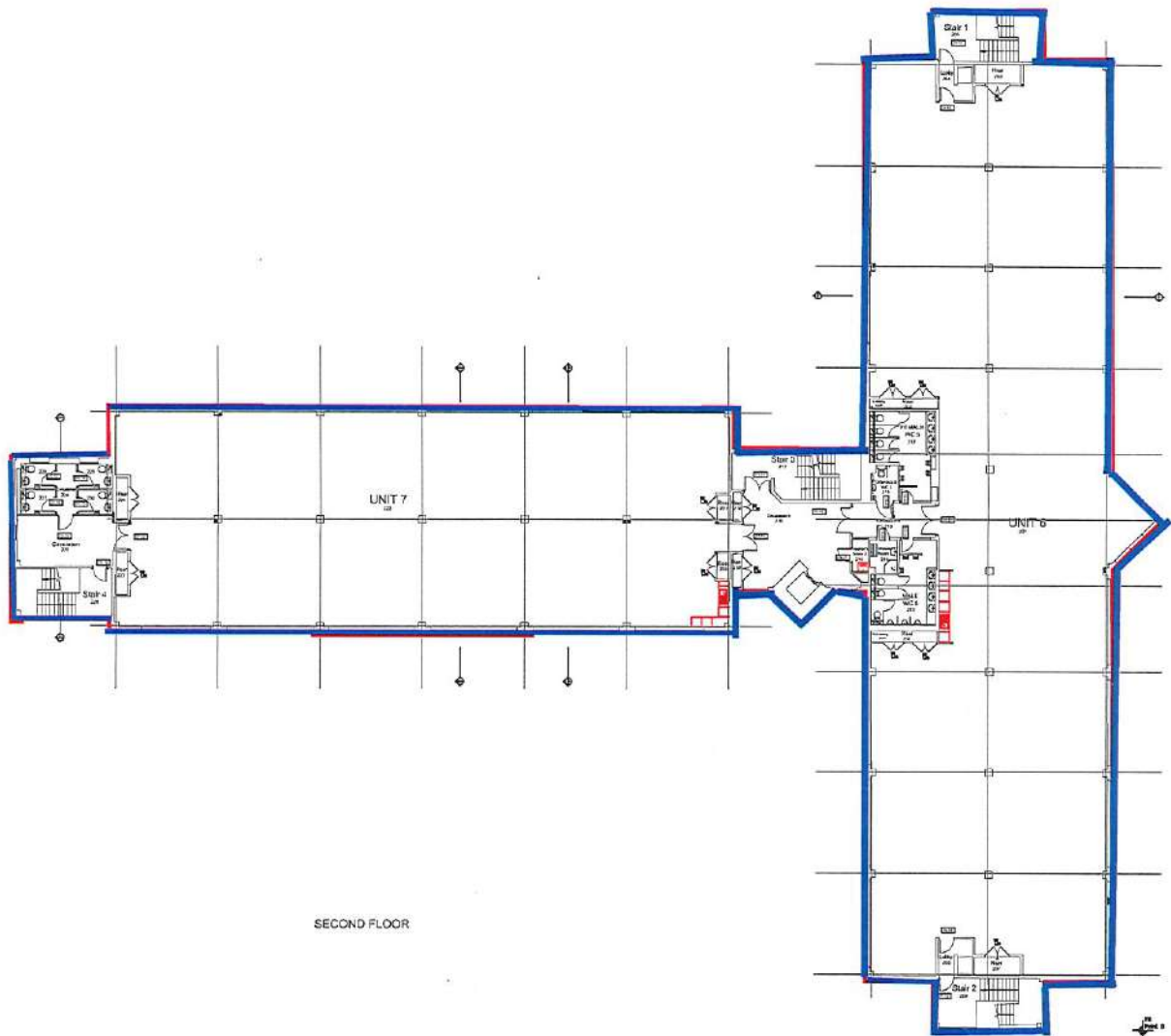
Project Title:	LONDON LUTON AIRPORT
Drawing Title:	TERMINAL - FIRST FLOOR

Status:	INFORMATION		
Scale @A3:	NTS	Date Created:	11/07/2024
Drawing Number:	LTN-PDAP001-C-001	Sheet:	1 of 1
		Revision:	000

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London Luton Airport  
Percival House 2nd Floor - Plan 2F



SECOND FLOOR



Rev	Date	Revision Note

Drawing Title:

Luton Airport - Percival House  
Second Floor (WizzAir)

Status: INFORMATION		
Scale @A3: NTS	Date Created: 11/07/2024	Sheet: 1 of 1
Drawing Number: LTN-PLAN017-C-001	Revision: 000	

**London Luton Airport  
Cargo Ground Floor - Plan 2G**

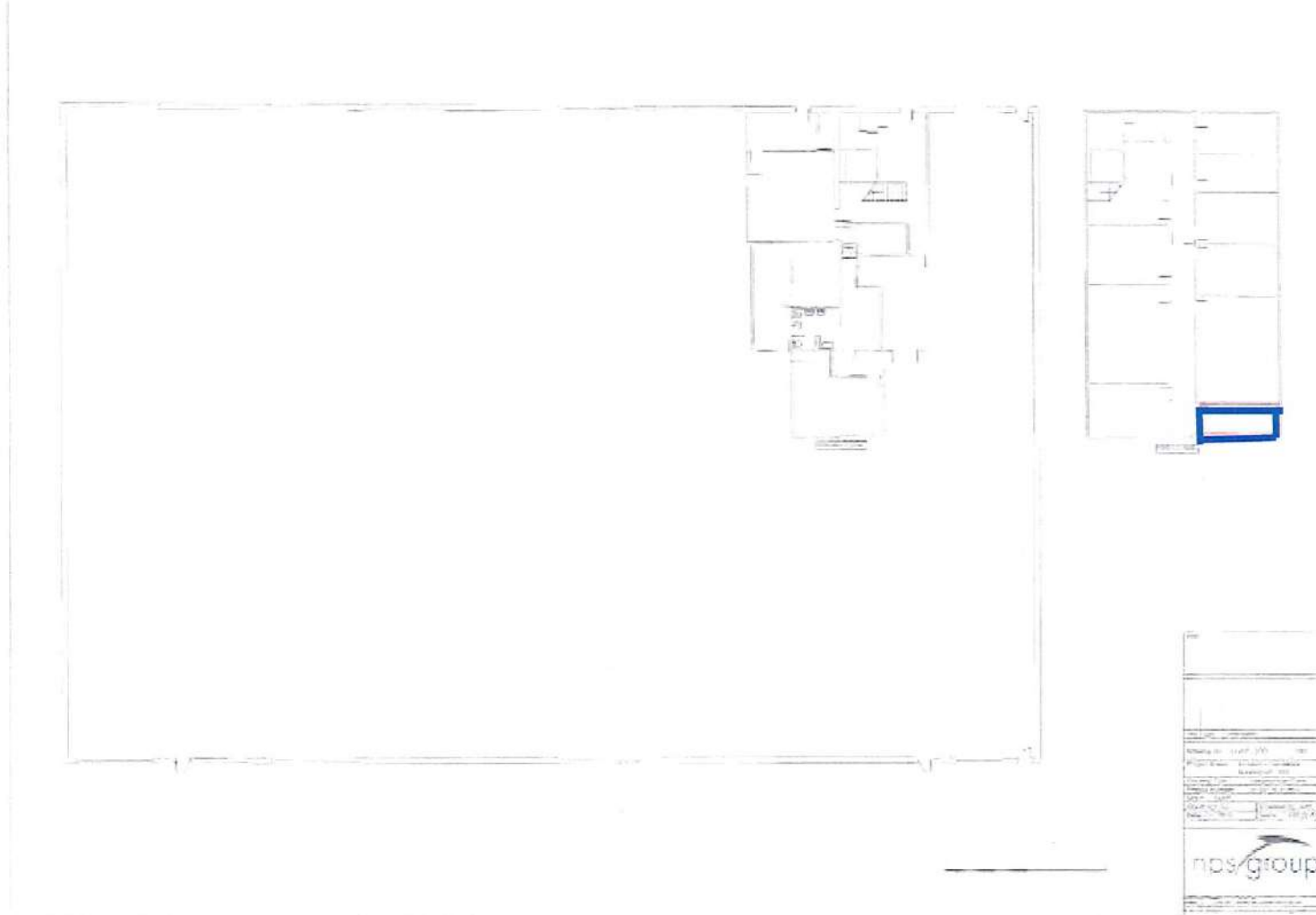
Cargo



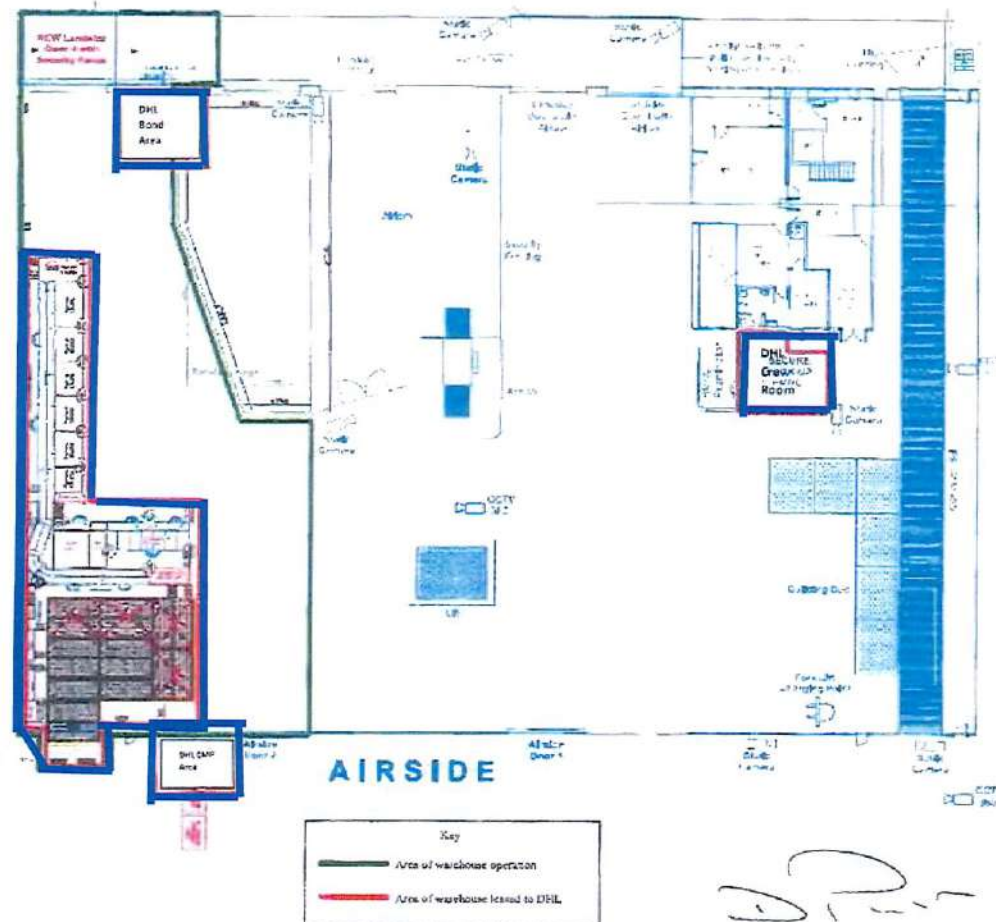
HB-510

**HB-510**

**London Luton Airport  
Cargo First Floor - Plan 2H**



**London Luton Airport  
Cargo Second Floor - Plan 2I**



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 PROTEST 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 ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)
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Defendants

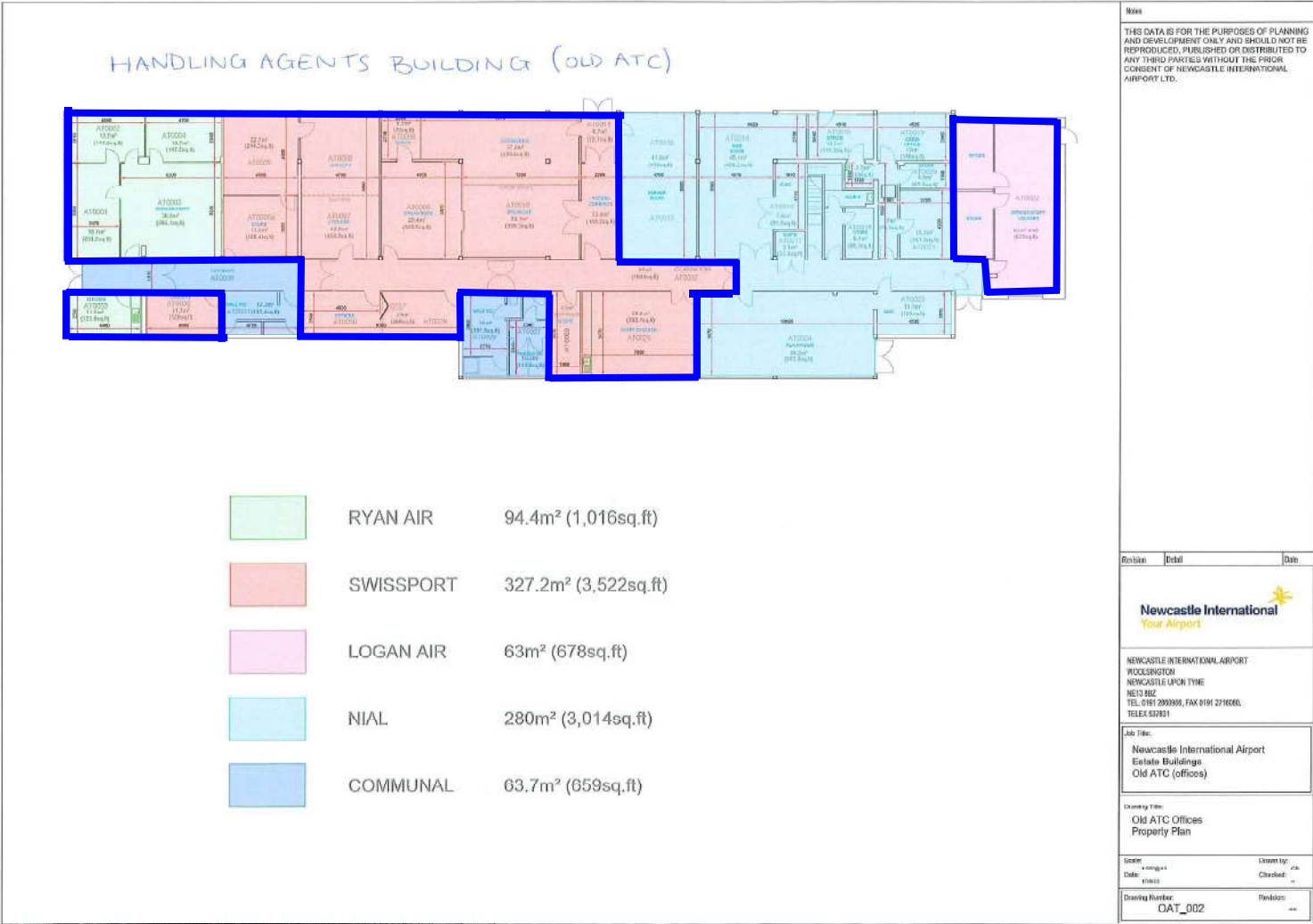
AW11

This is the exhibit marked “AW11” in the witness statement of Alexander James Wright.

The figure displays the architectural layout of Freight Building 3, showing the First Floor and Ground Floor. The Ground Floor plan includes a detailed room schedule table.

ROOM No.	STATUS	OCCUPANT
Office 1	Vacant	Vacant
Office 2	Occupied	NAL - Projects Archive Room
Office 3	Vacant	Vacant
Office 4	Occupied	DAVEY TURNER AIR CARGO
Office 5	Vacant	Vacant
Office 6	Vacant	Vacant
Office 7 & 8	Occupied	UKBA
Office 9 & 10	Vacant	Vacant
Office 11	Vacant	Vacant
Warehouse 12	Occupied	FAR LOGISTICS
Warehouse 13	Occupied	FAR LOGISTICS
Warehouse 14 & 15	Occupied	CASPER LOGISTICS
Warehouse 16, 17 & 18	Occupied	RUH
Warehouse 19	Occupied	NAL - Finance Archive
Warehouse 20	Occupied	NAL - Property & Planning Archive
Warehouse 21	Vacant	Vacant
Warehouse 22	Occupied	DAVEY TURNER AIR CARGO
Warehouse 23	Occupied	RUHNE & NAGEL
Warehouse 24	Occupied	RUHNE & NAGEL
Warehouse 25	Occupied	RUHNE & NAGEL
Warehouse 26	Vacant	Vacant (NAL Floor Tiles Storage)
Warehouse 27	Occupied	TRAVELLER AIR
Warehouse 28	Occupied	EAGLE COURBES
Warehouse 29	Occupied	EAGLE COURBES
Office 30	Occupied	RUHNE & NAGEL
Office 31	Occupied	RUHNE & NAGEL
Office 32	Occupied	RUHNE & NAGEL
Office 33	Occupied	RUHNE & NAGEL
Office 34 & 35	Occupied	RUHNE & NAGEL
Office 36	Occupied	CASPER LOGISTICS
Office 37	Occupied	FAR LOGISTICS
Office 38	Occupied	UKBA Customs

Newcastle International Airport  
Handling Agents Building 3 - Plan 3D



K:\Drawings\Estate Buildings\Old ATC Building\OAT\_001 Old ATC Building plans.dwg

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-

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Defendants

AW12

This is the exhibit marked “AW12” in the witness statement of Alexander James Wright.



**From:** [REDACTED]@lba.co.uk>  
**Sent:** 12 July 2024 11:19  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Just Stop Oil Protests

[REDACTED]

You may have read that Just Stop Oil activists are threatening to disrupt air travel this summer and you may have seen reports in the press about the incident at Stansted Airport on 20 June 2024 (in which 2 activists sprayed 2 private aircraft with orange paint).

We have recently decided to apply for a civil injunction to restrain incidents of trespass and nuisance by protesters at Leeds Bradford Airport.

We are not the only airport to have taken this decision. Injunctions are now in place at Heathrow, Manchester, Stansted, East Midlands and London City Airports.

We intend to make a joint application along with Newcastle and Luton Airports.

The application which we intend to make will extend to the whole of the airport which is covered by the airport's byelaws. This includes the land / buildings which are the subject of your leases. If the Court agrees to grant an injunction, the exact wording will be a matter for the Court's discretion. the intended effect of what we will be asking the Court to order, however, will be to prevent protest (including "peaceful" protest) on any part of the airport (or any flight departing from the airport) including the parts of the airport which have been leased to you. The need to prevent even "peaceful" protest arises acutely at airports because of their particular sensitivity, including in relation to matters of security, as we are confident you appreciate.

Please note that any order made by the Court will enable you to apply to the Court (on notice to us/our solicitors) to vary or discharge the injunction. So, if it turns out that the order creates some unforeseen problem for you, you will have the right to bring it to our attention and ask the Court to deal with the situation appropriately.

We do not propose to ask you to join in the proceedings as a joint Claimant, or to join you as named defendants.

We are aiming to apply to the Court for an injunction in the course of next week (week commencing 15/7/24), but we cannot provide a precise date.

If you have any queries, please let me know.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]@lba.co.uk>  
**Sent:** 12 July 2024 11:05  
**To:** [REDACTED]@westyorkshire.police.uk  
**Cc:** [REDACTED]  
**Subject:** Just Stop Oil Protests

Dear [REDACTED]

You may have read that Just Stop Oil activists are threatening to disrupt air travel this summer and you may have seen reports in the press about the incident at Stansted Airport on 20 June 2024 (in which 2 activists sprayed 2 private aircraft with orange paint).

We have recently decided to apply for a civil injunction to restrain incidents of trespass and nuisance by protesters at Leeds Bradford Airport.

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If you have any queries, please let me know.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]@lba.co.uk>  
**Sent:** 12 July 2024 11:03  
**To:** [REDACTED]@ryanair.com  
**Cc:** [REDACTED]  
**Subject:** Just Stop Oil Protests

Dear [REDACTED]

You may have read that Just Stop Oil activists are threatening to disrupt air travel this summer and you may have seen reports in the press about the incident at Stansted Airport on 20 June 2024 (in which 2 activists sprayed 2 private aircraft with orange paint).

We have recently decided to apply for a civil injunction to restrain incidents of trespass and nuisance by protesters at Leeds Bradford Airport.

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If you have any queries, please let me know.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]@lba.co.uk>  
**Sent:** 10 July 2024 20:57  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Just Stop Oil Protests

Dear [REDACTED]

You may have read that Just Stop Oil activists are threatening to disrupt air travel this summer and you may have seen reports in the press about the incident at Stansted Airport on 20 June 2024 (in which 2 activists sprayed 2 private aircraft with orange paint).

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If you have any queries, please let me know.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]@lba.co.uk>  
**Sent:** 10 July 2024 20:53  
**To:** [REDACTED]@swissport.com  
**Cc:** [REDACTED]  
**Subject:** Just Stop Oil Protests

Dear [REDACTED]

You may have read that Just Stop Oil activists are threatening to disrupt air travel this summer and you may have seen reports in the press about the incident at Stansted Airport on 20 June 2024 (in which 2 activists sprayed 2 private aircraft with orange paint).

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If you have any queries, please let me know.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]@lba.co.uk>  
**Sent:** 10 July 2024 20:44  
**To:** [REDACTED]@jet2.com  
**Cc:** [REDACTED]  
**Subject:** Just Stop Oil Protests

Dear [REDACTED]

You may have read that Just Stop Oil activists are threatening to disrupt air travel this summer and you may have seen reports in the press about the incident at Stansted Airport on 20 June 2024 (in which 2 activists sprayed 2 private aircraft with orange paint).

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If you have any queries, please let me know.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

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-

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Defendants

AW13

This is the exhibit marked “AW13” in the witness statement of Alexander James Wright.

---

**From:** [REDACTED]  
**Sent:** Thursday, July 11, 2024 3:45 PM  
**To:** [REDACTED]@menziesaviation.com>  
**Subject:** Incidents of Trespass

[REDACTED]  
You may have read that Just Stop Oil activists are threatening to disrupt air travel this summer and you may have seen reports in the press about the incident at Stansted Airport on 20 June 2024 (in which 2 activists sprayed 2 private aircraft with orange paint).

We have recently decided to apply for a civil injunction to restrain incidents of trespass and nuisance by protesters at London Luton Airport.

We are not the only airport operator to have taken this decision. Injunctions are now in place at Heathrow, Manchester, Stansted, East Midlands and London City Airports.

We intend to make a joint application along with Leeds Bradford Airport and Newcastle International Airport.

The application which we intend to make will extend to the whole of the airport which is covered by the airport's byelaws. This includes the land / buildings which are the subject of your lease. If the Court agrees to grant an injunction, the exact wording will be a matter for the Court's discretion. The intended effect of what we will be asking the Court to order, however, will be to prevent protest



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If you have any queries, please let me know.

Best

[Redacted]



[Redacted]

[Redacted]

London Luton Airport  
Percival House, Percival Way  
Luton, LU2 9NU

[Redacted]

[Redacted]

[Redacted]@ltn.aero  
W london-luton.co.uk

---

**From:** [REDACTED]  
**Sent:** Thursday, July 11, 2024 3:46 PM  
**To:** [REDACTED]@wfscorp.com>  
**Subject:** Incidents of Trespass

[REDACTED]  
You may have read that Just Stop Oil activists are threatening to disrupt air travel this summer and you may have seen reports in the press about the incident at Stansted Airport on 20 June 2024 (in which 2 activists sprayed 2 private aircraft with orange paint).

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We are aiming to apply to the Court for an injunction in the course of next week (week commencing 15/7/24), but we cannot provide a precise date.

If you have any queries, please let me know.

Best

[Redacted]



[Redacted]  
[Redacted]  
London Luton Airport  
Percival House, Percival Way  
Luton, LU2 9NU

[Redacted]  
[Redacted]  
[Redacted]@ltn.aero  
W london-luton.co.uk

**From:** [REDACTED]@ltn.aero>  
**Sent:** 11 July 2024 12:06  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Injunction

**Importance:** High

[REDACTED]

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If you have any queries, please let me know.

**If you are able to acknowledge receipt today via email and let me know if you have queries.**

Regards

[Redacted]



[Redacted]

[Redacted]

London Luton Airport  
Percival House, Percival Way  
Luton, LU2 9NU

[Redacted]

[Redacted]@ltn.aero  
[W london-luton.co.uk](http://london-luton.co.uk)

**From:** [REDACTED]@ltn.aero>  
**Sent:** 11 July 2024 11:51  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Injunction

**Importance:** High

[REDACTED]

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Regards

[Redacted]



[Redacted]

[Redacted]

London Luton Airport  
Percival House, Percival Way  
Luton, LU2 9NU

[Redacted]

[Redacted]@ltn.aero  
[W london-luton.co.uk](http://london-luton.co.uk)

**From:** [REDACTED]@ltn.aero>  
**Sent:** 11 July 2024 11:45  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Injunction

[REDACTED]

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If you are able to acknowledge receipt via email and let me know if you have queries.

Regards





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Luton, LU2 9NU



@ltn.aero  
[W london-luton.co.uk](http://london-luton.co.uk)

**From:** [REDACTED]@ltn.aero>  
**Sent:** 11 July 2024 11:40  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Injunction

[REDACTED]

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Percival House, Percival Way  
Luton, LU2 9NU

@ltn.aero  
[W london-luton.co.uk](http://london-luton.co.uk)

---

**From:** [REDACTED]  
**Sent:** Thursday, July 11, 2024 11:37 AM  
**To:** [REDACTED]@tui.co.uk>  
**Cc:** [REDACTED]@tui.co.uk>  
**Subject:** Injunction

[REDACTED]

You may have read that Just Stop Oil activists are threatening to disrupt air travel this summer and you may have seen reports in the press about the incident at Stansted Airport on 20 June 2024 (in which 2 activists sprayed 2 private aircraft with orange paint).

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If you have any queries, please let me know.

Regards

[Redacted signature]

[Redacted name]

[Redacted name]

London Luton Airport  
Percival House, Percival Way  
Luton, LU2 9NU

[Redacted name]

[Redacted name]@ltn.aero  
[W london-luton.co.uk](http://www.london-luton.co.uk)

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 PROTEST 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 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 PROTEST 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 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 PROTEST 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 ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

AW14

This is the exhibit marked “AW14” in the witness statement of Alexander James Wright.

**From:** [REDACTED]@newcastleinternational.co.uk>  
**Sent:** 11 July 2024 12:54  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Proposed Injunction

[REDACTED]

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Thanks.

**Kind Regards**

---

[REDACTED] **Chief Financial Officer** | Newcastle International  
DDI: [REDACTED] | Mobile: [REDACTED]



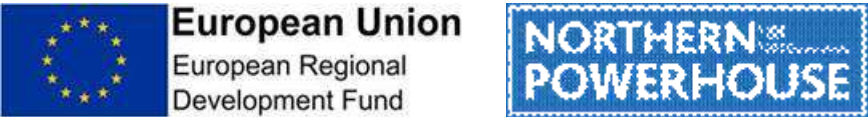
**From:** [redacted]@newcastleinternational.co.uk>  
**Sent:** 11 July 2024 12:53  
**To:** [redacted]@ctpne.police.uk  
**Subject:** FW: Proposed Injunction

Kind Regards

[redacted] | **Chief Financial Officer** | Newcastle International  
DDI: [redacted] | Mobile: [redacted]



[Newcastle Airport Solar Farm Project](#), supported by:



**From:** [redacted]  
**Sent:** Thursday, July 11, 2024 12:51 PM  
**To:** [redacted]@northumbria.police.uk  
**Subject:** Proposed Injunction

[redacted]

You may have read that Just Stop Oil activists are threatening to disrupt air travel this summer and you may have seen reports in the press about the incident at Stansted Airport on 20 June 2024 (in which 2 activists sprayed 2 private aircraft with orange paint).

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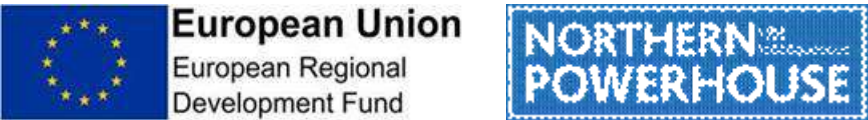
Thanks.

Kind Regards

\_\_\_\_\_  
[Redacted] | **Chief Financial Officer** | Newcastle International  
DDI: [Redacted] | Mobile: [Redacted]



[Newcastle Airport Solar Farm Project](#), supported by:



**From:** [REDACTED]@newcastleinternational.co.uk>  
**Sent:** 11 July 2024 12:52  
**To:** [REDACTED]@ncl-coll.ac.uk  
**Cc:** [REDACTED]  
**Subject:** Proposed Injunction

[REDACTED]

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Thanks.

**Kind Regards**

---

[REDACTED] **I Chief Financial Officer** | Newcastle International  
DDI: [REDACTED] | Mobile: [REDACTED]

**From:** [REDACTED]@newcastleinternational.co.uk>  
**Sent:** 11 July 2024 12:52  
**To:** [REDACTED]@homeoffice.gov.uk  
**Cc:** [REDACTED]  
**Subject:** Proposed Injunction

[REDACTED]

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**Kind Regards**

---

[REDACTED] **I Chief Financial Officer** | Newcastle International  
DDI: [REDACTED] | Mobile: [REDACTED]

**From:** [REDACTED]@newcastleinternational.co.uk>  
**Sent:** 11 July 2024 12:52  
**To:** [REDACTED]@swissport.com  
**Cc:** [REDACTED]  
**Subject:** Proposed Injunction

[REDACTED]

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**Kind Regards**

---

[REDACTED] **I Chief Financial Officer** | Newcastle International  
DDI: [REDACTED] | Mobile: [REDACTED]

**From:** [REDACTED]@newcastleinternational.co.uk>  
**Sent:** 11 July 2024 12:51  
**To:** [REDACTED]@dnata.com  
**Cc:** Karen Burns  
**Subject:** Proposed Injunction

[REDACTED]

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Thanks.

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---

[REDACTED] **I Chief Financial Officer** | Newcastle International  
DDI: [REDACTED] | Mobile: [REDACTED]

**From:** [REDACTED]@newcastleinternational.co.uk>  
**Sent:** 11 July 2024 12:51  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Proposed Injunction

[REDACTED]

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Please note that any order made by the Court will enable you to apply to the Court (on notice to us/our solicitors) to vary or discharge the injunction. So, if it turns out that the order creates some unforeseen problem for you, you will have the right to bring it to our attention and ask the Court to deal with the situation appropriately.

We do not propose to ask you to join in the proceedings as a joint Claimant, or to join you as named defendants.

We are aiming to apply to the Court for an injunction in the course of next week (week commencing 15/7/24), but we cannot provide a precise date.

If you have any queries, please let me know.

Thanks.

**Kind Regards**

---

[REDACTED] | **Chief Financial Officer** | Newcastle International  
DDI: [REDACTED] | Mobile: [REDACTED]

**From:** [REDACTED]@newcastleinternational.co.uk>  
**Sent:** 11 July 2024 12:50  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Proposed Injunction

Hi [REDACTED]

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DDI: [REDACTED] | Mobile: [REDACTED]

**From:** [REDACTED]@newcastleinternational.co.uk>  
**Sent:** 11 July 2024 12:50  
**To:** [REDACTED]@kuehne-nagel.com  
**Cc:** [REDACTED]  
**Subject:** Proposed Injunction

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[REDACTED] **I Chief Financial Officer** | Newcastle International  
DDI: [REDACTED] | Mobile: [REDACTED]

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-

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Defendants

AW15

This is the exhibit marked “AW15” in the witness statement of Alexander James Wright.

# Extinction Rebellion co-founder arrested at Heathrow protest

Group said that Roger Hallam had been apprehended for the second time in three days

One of Extinction Rebellion's co-founders has been arrested for the second time in three days after trying to fly a drone near Heathrow Airport during an environmental protest, the group said.

Roger Hallam was detained on Saturday while attempting to disrupt flights at Britain's busiest airport with the device.

The activist had been arrested on Thursday during a pre-emptive wave of arrests ahead of the climate change action, and was bailed with conditions not to be within five miles of any airport or possess drone equipment, Extinction Rebellion said.

Footage appears to show him being dragged into a van by several police officers.

A splinter group of Extinction Rebellion, called Heathrow Pause, has been trying to interrupt flights by flying drones in the 5km exclusion zone around the major transport hub.

The group wants to highlight the "dangerous folly of Heathrow expansion" and see the planned third runway cancelled.

Some of the toy drones appear to have been prevented from working by what the activists suspect were signal jammers.

As yet, the eco-protesters have failed to cause any delays and flights continued to land as normal on Friday and Saturday.

Nineteen people, aged between 19 and 69, have now been arrested since Thursday related to the protest, said Scotland Yard.

All were detained on suspicion of conspiring to commit a public nuisance or attempting to commit a public nuisance, with 16 since released on police bail.

A 53-year-old man arrested on Thursday was arrested again on Saturday and taken into police custody, the force added.

A dispersal order around the airport will remain in place until 4.30am on Sunday "to prevent criminal activity which poses a significant safety and security risk to the airport", the force said.

Heathrow Pause claimed one activist was "meditating in a garden when he was bitten on both legs by a police dog" on Thursday.

But the Metropolitan police said while they attempted to arrest a man in Hornsey, north [London](#), "he made off from them on foot".

A spokeswoman added: "He was pursued by officers and a police dog, which bit the man on the leg as he was subsequently detained.

"The man received minor injuries to his leg but declined to be taken to hospital. He was arrested on suspicion of conspiracy to commit public nuisance and taken to a police station, where he currently remains in police custody."

Heathrow and police refused to comment on specific measures they may have taken to stop the protesters' drones from working, but one expert said existing technology can jam signals between operators and drones.

Richard Gill, chief executive of Drone Defence, told the Press Association: "That technology is definitely available and can do exactly that. When a drone is operated remotely it relies on a radio connection between the drone and the pilot. Interference can cut that connection between the operator and the drone."

Former Paralympian James Brown was arrested at Terminal 2 on Friday after he took part in the protest, and he told PA that there were up to 35 people willing to fly the devices in an attempt to cause disruption.

Mr Brown, who is partially sighted, did not actually fly a drone and said he held it above his head.

Despite the minimal disruption, Heathrow Pause said it is happy about the "conversation" triggered by its action.

It said on Friday: "The real objective was always to trigger a sensible, honest conversation, throughout society, on the dangerous folly of Heathrow expansion, with the ultimate objective of cancelling the third runway.

"That conversation is now happening. It is incumbent on all of us to keep it going."

Heathrow Airport confirmed its runways were open and said they were committed to addressing climate change.

It said in a statement on Friday: "We will continue to work with the authorities to carry out dynamic risk assessment programmes and keep our passengers flying safely on their journeys today.

"We agree with the need for climate change action but illegal protest activity, designed with the intention of disrupting thousands of people, is not the answer.

"The answer to climate change is in constructive engagement and working together to address the issue, something that Heathrow remains strongly committed to do."

Earlier this week, Metropolitan police deputy assistant commissioner Laurence Taylor advised Heathrow passengers to travel as normal and said they were "confident" disruption would be kept to a minimum.

This action is the latest in a string of climate change protests this year, including the widespread action in London in April, which saw Extinction Rebellion bring sites including Oxford Circus and Waterloo Bridge to a standstill.

# Extinction Rebellion co-founder ‘plotted to ground Heathrow traffic with drones’



Extinction Rebellion’s co-founder plotted with others to fly drones near Heathrow in order to ‘paralyse’ the transport hub and ‘embarrass’ the Government into abandoning plans for a third runway at the airport, a court has been told (PA)  
PA Wire



# West End Final

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Extinction Rebellion's co-founder plotted with others to fly drones near [Heathrow](#) in order to "paralyse" the airport and "embarrass" the [Government](#) into abandoning plans for a third runway there, a court has been told.

[Roger Hallam](#) and other eco-activists wanted backing for the protest, launched under the name Heathrow Pause, to go viral and shut down the airport while also triggering arrests and lots of publicity, London's [Isleworth Crown Court](#) was told.

Hallam told detectives in his police interview that the aim of the September 2019 protest was to "close Heathrow for the foreseeable future", the jury heard.

Hallam, 57, of Wandsworth, south London, Larch Maxey, 51, of no fixed abode, and Valerie Milner-Brown, 71, of Islington, north London, have pleaded not guilty to a charge of conspiracy to cause a public nuisance.

Another man, Michael Lynch-White, who is not appearing at this trial, has pleaded guilty to the same charge, jurors were told.

It was to put the operators on alert of the risk of potential catastrophe. As operators concerned primarily with safety, they would have to scramble their ultimate safety measure

Prosecutor James Curtis KC

Hallam, Maxey and Milner-Brown are accused of conspiring with Lynch-White and others on or before September 14 2019 to close the transport hub to air traffic by the “unauthorised and unlawful flying” of drones within Heathrow’s 5km (3.1-mile) flight restriction zone.

A media campaign was launched and “random people” who believed in the cause were invited to “pop up” and make sure the “threat was multi-headed and compelling”, prosecutor James Curtis KC said.

He said: “It was to put the operators on alert of the risk of potential catastrophe. As operators concerned primarily with safety, they would have to scramble their ultimate safety measure.”

Mr Curtis added: “This case is not about the merits of the various measures which are desired to save the planet nor is it about the beliefs of the people who want to achieve those ends.

“This case is about the closure of Heathrow airport in the short term or, as they contemplated, in the long term, closing it down to world traffic.”

Mr Curtis said the defendants’ “stated aim, made in note after note, public pronouncement after public pronouncement, was to paralyse the major transport hub of Great Britain which is also the busiest in Europe” and to do it “not just for an hour or so but a week, two weeks” or “an indistinct period”.

There is terrible danger for aircraft being struck or nearly struck by flying objects

Prosecutor James Curtis KC

The court was told the protesters’ “agreed plan” came from the “most laudable aims – to save the planet from imminent destruction” – and the deaths they predict could come from carbon emissions.

Mr Curtis said the protest was aimed at “forcing the Government and Parliament to reverse the go-ahead for Heathrow’s third runway project” and they sought to do this “by paralysing a major organ of the country and forcing Heathrow to shut down”.

It is not suggested the activists plotted to kill anybody or cause an aircraft to crash.

Mr Curtis said their aim was to force operators to face a “potential catastrophe” so they would ground flights.

He said: “There is terrible danger for aircraft being struck or nearly struck by flying objects. It would be a risk that the operators would not be able to afford to take with human beings or vital cargo on board and with homes nearby on the ground beneath.”

People joining the protest would also have posed a risk because “most of them were new to drone flying, with little or no experience of flying machines”, the court heard.

Claims by the protest group that they hoped passengers could have made alternative arrangements and that stringent safety measures were taken by the activists were described by the prosecution as “pie in the sky”.

The court was also told the environmental activists met police before the protest to discuss their plans to fly toy drones in the Heathrow exclusion zone.

Mr Curtis said they ignored the “misery and inconvenience” to passengers, which could have included holidaymakers, people visiting dying relatives or the vital transport of medical cargo.

He said they ignored “the vast economic damage” that could have been caused worldwide because “what mattered was in their hearts – they were on a mission of ideals”.



The hearing was adjourned to Tuesday at 10am.

# Extinction Rebellion co-founder avoids jail term for drone action near Heathrow

Roger Hallam and two other activists given suspended sentences at Isleworth crown court in London

Extinction Rebellion and Just Stop Oil's co-founder Roger Hallam has avoided imprisonment after attempting to bring disruption to Heathrow airport by getting involved in [an action to fly toy drones](#) in the vicinity.

Climate activists said the aim of the plan was to raise awareness about the impact of the airport's proposed third runway on the climate.

Hallam, along with Dr Larch Maxey, had previously been found guilty of conspiracy to cause public nuisance in relation to the Heathrow drones action. A third man, Mike Lynch-White, pleaded guilty.

At a sentencing hearing at Isleworth crown court in west [London](#) on Friday, Hallam and Maxey were both given two-year sentences suspended for 18 months. Lynch-White was given a 17-month sentence suspended for 18 months. All are required to carry out hundreds of hours of community service.

Climate activists who attended court welcomed the fact that the men received non-custodial sentences.

The drones were in the air between 14 and 18 September 2019 and in the words of Judge Edmunds, when passing sentence on Friday, "the action fizzled out, with no more than 20 drones within a five-day period" flown.

The drone flights were within the 5km exclusion zone around the airport.

While the judge said he was satisfied that all three men were committed to the principle of non-violence, he found them to be "naive" about the risks of the action.

In November 2023 the court heard that Hallam and others planned to fly drones near Heathrow in order to "paralyse" the airport and "embarrass" the government into abandoning plans for a third runway there.

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Defendants

AW16

This is the exhibit marked “AW16” in the witness statement of Alexander James Wright.

# About

## DISRUPTION WORKS.

## DISRUPTION IS JUSTIFIED.

Only mass civil resistance can stop the top global 1% imposing mass death on billions of people.

We are out of time for anything else.

“The essence of what is human is the ability to make a decision, a conscious decision, about what is right in life.”

As an organic farmer for over 20 years, I could no longer sustain my vegetable growing. The impacts of climate change were decimating the livelihoods of farmers such as myself. Something was very wrong with the world; I could feel it, I could see it and I knew that something had to be done about it as our entire food production system was at stake.

I studied the science and realized beyond unequivocal doubt that the extinction crisis was upon us and that our impending annihilation was being perpetuated by psychopathological criminals who have no

interest in the wellbeing of the average human being or the natural world.

Something needed to be done; I gave up everything I had and left for Kings College where I spent the next 4 years sleeping in my car in order to complete my studies in the science of mass mobilization in the tradition of Martin Luther King and Gandhi. I found the answers to the questions I had been seeking. I discovered the actions that we need to take in order to buy ourselves as much time as possible and mitigate indescribable suffering that awaits us as most of the planet becomes uninhabitable and we risk unspeakable horrors such as mass slaughter, starvation and rape, and the rise of fascistic regimes as the scramble for water and land takes off.

## HOPE DIES, ACTION BEGINS.



My arrest for flying toy drones outside Heathrow Airport

I've been accused of many things, most of them are true.

Some of them however are carefully crafted media propaganda, which even my own movement has used against me.

This is something that you can expect unfortunately when you use your voice and stand out from the crowd. The only way we're going to sort ourselves out is if we realise that this is not about us, but about our children and everything we hold sacred. Something bigger than us. About all that we hold to be sacred.

We've got to get ourselves and our egos out the way if we are going to make a change. We are going to have to be willing to make sacrifices because what we are facing is worse than World Wars. It threatens all life on this planet.

We have to let go of who we thought we were and how we thought life would turn out, and be willing to step into service for the sake of all that we hold to be precious. We need a revolution.

In 2018 I co-founded [Extinction Rebellion](#). I have lost count of the number of times I have been arrested. I have been on two hunger strikes

I have been to prison three times in the last three years and I am waiting for three jury crown court trials in the UK.

I started [Burning Pink](#) in 2019 to create a direct action movement which would stand in elections to create a political revolution: legally binding citizens assemblies to take over from politicians. We have painted the buildings of NGOs and political parties that refuse to tell the truth and act upon it.

## The Manifesto: What is to be done

It is clear that catastrophe is now locked in. Short of a technological miracle being rolled out in the next five years, global heating will force around a billion people to leave their homes within the next two

decades as the world heads over 2C – that’s 7C in inland areas, 15C on a “hot day”. The global economic system will collapse and impoverishment will hit billions of people. Revolutions are now inevitable. Functional human extinction – only around a billion people located about the polar regions – is not. The key question for humanity now is whether the revolutions will be fascistic or democratic – based upon hate or popular deliberation, enacting escapist nihilism or compassionate realism. So what is to be done?

### **Exit reformism to begin the revolution**

Reformism makes sense when the structure of society is sound. When it is about to collapse then it becomes at best a displacement activity and at worst an active block to effective collective action. Preparing for the revolution means two things: first to give up our jobs and “go to the people”, working 60-70 hours a week – leafleting, setting up stalls, door knocking, creating public meetings for working class orators who can move people to tears, and also people’s assemblies where people reconnect and discover the ecstasy of solidarity. Second, a growing alliance of the willing needs to shut down “the economy” – that is, the death machine that is taking us to extinction – blocking roads and transport infrastructure, city centres and financial districts, week after week until arrests lead to violence by the state and imprisonment. Absolute nonviolent discipline will need to be maintained so that an internal open democratic culture can flourish, and we can appeal to the general population to join with us. The revolution will be led by women and the young and old, not by aggressive men, or it will turn into civil war and fascism.

### **Enact a radical democratic takeover of the state and institute citizens’ assemblies**

Only a revolution can save us now because what objectively needs to be done to slash carbon emissions cannot be done by the gradualist



carbon addicted regimes. This is not a “radical” position. It is a position held privately by government insiders and experts all round the world. The present regime has utterly failed and it will not save us. Going to more COPs is fucked! What is needed is a pincer movement – to stand in elections as ordinary people to uncompromisingly tell the truth and call for legally binding citizens’ assemblies to take over from politicians, and at the same time to organise mass civil disobedience in capital cities to last for two to four weeks – until the central demand for citizens’ assemblies is agreed to. This how rapid political change takes place.

**Citizens’ assemblies – legally binding and independently organised, followed by a second revolution on the streets.**

Permanent citizens’ assemblies need to become the new legislative arm of the state. This is the precise constitutional definition of a democratic revolution in the twenty-first century. They are legally binding so they cannot be ignored by parliaments and are organised by independent civil society groups and social movements rather than by the government and elites. When they announce their decisions, the carbon elites and their political administrators will break the rules and use lies and violence to try to take back power. This happens in all revolutionary episodes. We have to be prepared for this. As soon as citizens’ decisions are made millions will have to come back onto the streets to ensure the people’s will is done. That we demand life not death. And nothing will stop us.

**All hands on deck for zero emissions and geo engineering**

Citizens’ assemblies need to be asked how to get to zero emissions within 2-4 years, an 80% cut in two years. Not “net zero” which enables the carbon addicts a get out clause of “over shooting” and bringing down the temperature with technologies that do not yet exist. People in the citizens’ assemblies will be selected randomly

from the population and will need to have their deliberations shown live on TV so that the whole population can learn about the horrors of our situation. Cities and regions should hold their own assemblies and debates so legitimacy for a complete emergency draw down of the carbon economy wins popular patriotic support – that is, our country, all our traditions, are at stake unless we completely change course. Outcomes will involve decisions such as:

- Halving of the total national energy requirements within weeks: through banning of flying, fossil fuel car use, non-essential consumption, with all ongoing material production designed to last for the longest period possible (similar to a covid lockdown scenario but with local people being able to meet, socialise, and be politically active).
- The reappropriation of 90% of the assets of the top 10% income bracket of the population to fund this emergency transformation, as would happen in wartime.
- Massive investment in renewable energy and retrofitting of housing to the extent of removing all fossil fuel inputs into the economy within two years. A ban on all new construction and the appropriation of all empty housing to give to those in housing need.
- Massive investment in creating natural carbon sinks and geoengineering – the latter being used to the extent necessary to return to 350 parts per million of CO<sub>2</sub> in the atmosphere.

All of this is beyond politics, it is objectively necessary. It will only be opposed by carbon psychopaths on the left and right whose pursuit of their private interests undermine the common good – that is, the need for our families, communities and nations to continue to exist. The situation is like a war or a national emergency – like covid. Everyone will have to come together. Otherwise we are done for. It's as simple as that.

This is what needs to be done.



On BBC's Hardtalk

# THE CLIMATE REVOLUTION IS BEYOND POLITICS

At 2°C above pre-industrial temperatures it will be 4C or more inland, 10°C hotter on a “hot day”; too hot for billions of people to grow food. A thousand million people will be forced to leave their homes ( ref: [Future of the human climate niche](#) )

The climate crisis is creating social collapse which will get worse and worse each decade.

**Conservatives:**

Allowing this to happen violates all our traditions, destroys families and communities, destroys our nations.

### **Liberals:**

We face the destruction of all the progress towards freedom and prosperity built up over hundreds of years.

### **Radicals:**

Corporate capitalism doesn't just create vile inequality, it now creates global mass death. It has to be stopped.

Only a revolution can bring us together. Only when we remember that we are all connected, only when we remember we are not separate from nature but part of it, only then can we come together on the basis of the one human value on which we all can unite: that life is good and we must preserve it at all cost. Whatever it takes.

## **“We face a stark choice: Resistance or Complicity”**

### **TAKE ACTION**

“Only by engaging in civil resistance: breaking the laws of governments, leading to arrest and prison, will we force them to change. It's too late for anything else”

Sign up

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-

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Defendants

AW17

This is the exhibit marked “AW17” in the witness statement of Alexander James Wright.

RESTRICTED (when complete)

Page 1 of 5

**WITNESS STATEMENT**

(Criminal Procedure Rules, r27.2; Criminal Justice Act 1967, s.9; Magistrates' Courts Act 1980, s.5B)

URN: 

Statement of: Benjamin David Smith

Age if under 18: 0/18

Occupation: T/Assistant Chief Constable

This statement (consisting of 5 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I may be required to attend court and that I shall be liable to prosecution if I have wilfully stated anything in it, which I know to be false, or do not believe to be true.

Signature:  ACC 1618

Date: 10/04/22

I am the above named person and have worked as a police officer for Warwickshire Police for the last 18 years. I am currently Temporary Assistant Chief Constable with responsibility for Local Policing, but I am also Gold Commander, and the senior policing lead, for the response to protest activity linked to the Kingsbury Oil Terminal. Warwickshire Police, in terms of forces nationally, is a relatively small force. It has 1050 officers currently policing a population 570,000 people spread across an area just under 2,000 sq km.

Prior to 1<sup>st</sup> April 2022, I had received a number of briefings on Just Stop Oil, who are a protest group and describe themselves as a coalition of groups working together to ensure the Government commits to halting new fossil fuel licensing and production.

In responding to protest, the police have two main duties; to not prevent, hinder or restrict peaceful protest; and in certain circumstances, take reasonable steps to protect those who want to exercise their rights peacefully.

As Gold for the operation I wrote a strategy with the overall aim being:

**to provide an impartial and proportionate policing response to protests in relation to the lawful activities at Kingsbury Oil Terminal, protecting life and minimising the risk of harm to all those connected to it.**

Although plans were made to police potential protest activity linked to Just Stop Oil, the scale and frequency of the activity that has been experienced over the last 10 days has created a real challenge for the force and indeed UK policing. In addition it is important to make clear that although policing has a duty to protect the rights of those who wish to protest peacefully, the Just Stop Oil protest activity has not been peaceful or lawful. The group has engaged in direct unlawful action to prevent the lawful activity of the oil depot and its distribution partners.

At the time of writing there have been 180 arrests in Warwickshire alone.

I will now provide a summary of the protest activity the force has dealt with since 1<sup>st</sup> April.

Signature:  ACC 1618

Signature witnessed by:

2017

Ben Smith/04/22

RESTRICTED (when complete)

Page 2 of 5

Statement of Benjamin David Smith

URN: 31<sup>st</sup> March – 1<sup>st</sup> April

Approximately 40 protestors attended the site at Kingsbury in possession of various devices to lock on to each other, vehicles or infrastructure. They were also in possession of glue to glue themselves to the carriageway. The protestors stopped and then climbed on oil tankers, glued themselves to the road and sat in the main entrance roadway. Distribution operations at the site were suspended and a significant police operation was instigated. 42 arrests were made and distribution operations at the site recommenced at 2030hrs.

2<sup>nd</sup> April – 3<sup>rd</sup> April

At approximately 1930hrs, 40 protestors attended the Kingsbury site, blocking the main entrance. They glued themselves to the carriageway and locked onto each other. A number also climbed on top of oil tankers. Protest activity continued throughout the night and into 3<sup>rd</sup> April. Distribution Operations at the site were suspended and only partially re-opened at 1730hrs. Protestors remained at the site till 0000hrs before dispersing. Total arrest numbers at 68.

5<sup>th</sup> April

At 0730 hrs, 20 protestors attended the site and blocked the main entrance, again locking onto each other and gluing themselves to the carriageway. Operations at the depot were suspended. 10 arrests were made and the site was operational by 1100hrs.

A second wave of protestors attended the site at 1130hrs and targetted Junction 9 and Junction 10 of the M42, climbing onto oil tankers as they moved slowly off the slip roads. Operations at the depot were suspended and some tailbacks encroached onto the M42, creating risk to other road users. The protestors were removed and roads reopened at 1430hrs, with operations recommencing at the site. Total arrest numbers at 78.

7<sup>th</sup> April

At 0030 hrs, a small group of protestors approached the main entrance to the site and attempted to glue themselves to the carriageway. While police resources were distracted, 40 protestors approached across the fields to the rear of the site. They sawed through an exterior gate and scaled the fences to gain access to the oil terminal. Once on site, the protestors dispersed to a number of different locations including: the tops of three large fuel storage tanks containing unleaded petrol, diesel and fuel additives; two insecure cabs of fuel tankers locking themselves in with keys; the tops of two fuel tankers; onto the floating roof of another large fuel storage tank; into a half constructed fuel storage tank. They also used various lock on devices to secure themselves to the structures.

Signature: 

Acc 16 JF

Signature witnessed by:

2017

Ben Smith/04/22

RESTRICTED (when complete)

Page 3 of 5

Statement of: Benjamin David Smith

URN: 

An extremely complex and challenging policing operation was initiated, utilising a variety of specialist teams, working alongside staff from the oil terminal and the fire service. The site was cleared of protestors by approximately 1700hrs. Total arrest numbers at 127.

#### 9<sup>th</sup> April – 10<sup>th</sup> April

At 1050hrs, 4 protestors arrived at the main entrance and attempted to glue themselves to the carriageway. Three were arrested immediately. A short while later a male was arrested trying to abseil from a road bridge over Trinity Road to the north of the site, attempting to block the road. At 1530hrs, a caravan was deposited at the side of the road on Piccadilly Way, to the South of the site and 20 protestors glued themselves to the sides and top of the caravan. It was discovered that occupants within the caravan were attempting to dig, via a false floor, a tunnel under the road which would have blocked it for a considerable period. The caravan was forcibly entered at 0200hrs on the 10<sup>th</sup> April and 6 occupants arrested. An additional 22 were arrested from outside the caravan. Protestors continued to target the site on the 10<sup>th</sup> April, scaling tankers and gluing themselves to the carriageway. By the end of the day the total arrest numbers was at 180.

It is also important to note that Kingsbury has not experienced a constant level of peaceful or lawful protest. The protest activity has manifested as periods of high intensity, high volume and unlawful protest, followed by no protest over the next 24 hours. The activity has been highly coordinated, specifically targetted, and immediately unlawful in nature.

#### **Policing Operation**

The scale and duration of the policing operation has been one of the most significant that I have experienced in my career. Large numbers of officers, drawn from right across the force, have been deployed to Kingsbury day and night since the 1<sup>st</sup> April. This has meant that we have had to scale down some non-emergency policing services, including those that serve North Warwickshire. Although core policing services have been effectively maintained across the County during this period, the protests have undoubtedly impacted on the quality and level of the policing services that we are able to deliver. Officers who may have ordinarily been policing the communities of North Warwickshire, the road networks of North Warwickshire, or supporting victims of crime in North Warwickshire have had to be redeployed to support the policing operation linked to Kingsbury. It has also meant that we have had to bring in additional officers from other regional forces, in addition to more specialist teams such as working at heights teams and protest removal teams. All of these will come at significant additional cost to the force and ultimately the public of Warwickshire.

#### **Community Impact**

Signature:  Acc 1618

Signature witnessed by:

2017

Ben Smith/0422



RESTRICTED (when complete)

Page 4 of 6

Statement of: Benjamin David Smith


URN: 

The impact on the local community has been substantial. There have been almost daily road closures of the roads around the oil terminal which has created disruption and inconvenience. The M42 has also been disrupted on occasions as a result of the protest activity. There has been a significant policing presence since the 1<sup>st</sup> April which I am sure has created a level of fear and anxiety for the local community. The policing operation has also extended into unsociable hours, with regular essential use of the police helicopter overnight disrupting sleep. The reckless actions of the protestors has also created increased risk of potential fire or explosion at the site which would likely have catastrophic implications for the local community including the risk of widespread pollution of both the ground, waterways and air. Finally, the actions of the protestors has impacted the supply of fuel to petrol forecourts in the region leading to some shortages, impacting upon not only local residents but the broader West Midlands region.

### Investigation

A significant police investigation is underway to deal with all those protestors who have been arrested as part of the operation. Although large numbers of arrests have been made, the offences for which they can be arrested (obstruction of the highway etc) are generally low level and summary only offences which means the criminal justice options can be limited. We have also utilised bail conditions to try and prevent protestors returning to the site but these have largely proved to be unsuccessful with many of the protestors already being arrested multiple times from the Kingsbury site. Even when protestors breach their bail conditions, unless arrested for a further substantive offence, that are merely dealt with for the original offence for which they were arrested prior to the bail conditions being set. As stated, these are low level summary offences and therefore charge and remand in custody is not an option open to us. We have considered other potential options, including attempting to seek a threshold test charge on conspiracy offences on the evening of the 10<sup>th</sup> April. This did not meet the CPS bar, and therefore the detainees were bailed again with conditions. Other potential police powers have been considered but none that we are aware of would give us the weight of severity that would allow us to seek a charge and remand in custody. An Injunction would allow us to put the detainee immediately before a court to seek a remedy which may help to disrupt the enduring unlawful protest cycle that we currently find ourselves in.

Warwickshire Police would be fully supportive of this injunction as we consider that it would be expedient for the promotion or protection of the interests of the inhabitants of the local area. A power of arrest would allow my officers to deal with protestors effectively and robustly and then place them immediately before the court. We have considered all other options. This may then provide some deterrent to the ongoing unlawful behaviour and may help to protect the local community from the tortuous ordeal that they are currently experiencing.

Signature:  A.C. 1618

Signature witnessed by:

2017

Ben Smith/D4/22

RESTRICTED (when complete)

Page 5 of 5

Statement of: Benjamin David Smith

URN: 

I have grave concerns for public safety should the behaviour of the protestors continue in its current form. The Kingsbury site is an extremely hazardous site where the very presence of certain items and clothing on site is restricted because of the potential dangers of explosion or fire. The protestors have had no regard for their own or others safety with actions including the use of mobile phones on site (strictly prohibited), the scaling and locking on to very volatile fuel storage tanks, the tunnelling activity in close proximity to high pressure fuel pipes, and the forced stopping, and then scaling, of fuel tankers on the public highway. Not only does this cause unacceptable levels of risk to themselves and the public, it also puts my officers in significant danger as they have to attempt to remove them from the places they have decided to put themselves.

To support this application I have provided exhibit BDS1, which is a selection of Section 9 statements from my officers who have been at Kingsbury Oil Terminal and witnessed the protest activity first hand. I also exhibit BDS2, which are a number of video clips which illustrate the unlawful activity that the protestors are engaging in.

 ACC 1618
Signature: 

ACC 1618

Signature witnessed by:

2017

Ben Smith/04/22

IN THE HIGH COURT OF JUSTICE  
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Defendants

AW18

This is the exhibit marked “AW18” in the witness statement of Alexander James Wright.

# The Mail on Sunday can Just Stop Oil activists plan to storm terminal buildings to hold sit-ins, glue themselves to runways and even climb on to jets to paralyse the travel industry

Eco-zealots are plotting to ruin family holidays this summer by wreaking havoc at airports across the country.

An undercover investigation by The Mail on Sunday can reveal mobs of [Just Stop Oil](#) activists plan to storm terminal buildings to hold sit-ins, glue themselves to runways and even climb on to jets to paralyse the travel industry.

[Tory](#) MPs last night accused the group of harming their cause by 'targeting happiness with misery' and warned their cavalier plans could risk lives.

Blueprints for the summer of chaos – which aims to bring flights to a standstill day after day and destroy the holidays of 'ordinary people' – were unveiled at a strategy meeting of 100 hardcore campaigners in [Birmingham](#) last week.

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.









She said a blind friend of hers was jailed after he 'stood on top of a plane, disrupting tens of flights', and also hailed German eco-activists who 'went on to runways, gluing their hands to the ground'.

'So, close your eyes for a moment, be imaginative, and think about what we could do together,' Ms Rumbelow said. 'We can make this happen at scale this summer.'

## Who will pay if my flight is cancelled?

Airlines have to compensate passengers if a flight is cancelled or delayed by more than three hours – but only if they are responsible.

And unfortunately, in the case of activists targeting an airport, they would unlikely to be considered at fault, says consumer champion Martyn James. In some cases the airline will still be required to get passengers to their destination – though this will depend on what the activists do.

If Just Stop Oil force cancellations by gluing themselves to runways or scaling planes, then under the law airlines are obliged to get travellers on the next available flight.

If, however, campaigners block terminals and stop passengers being able to board planes and the flight simply leaves without them, airlines are not responsible.

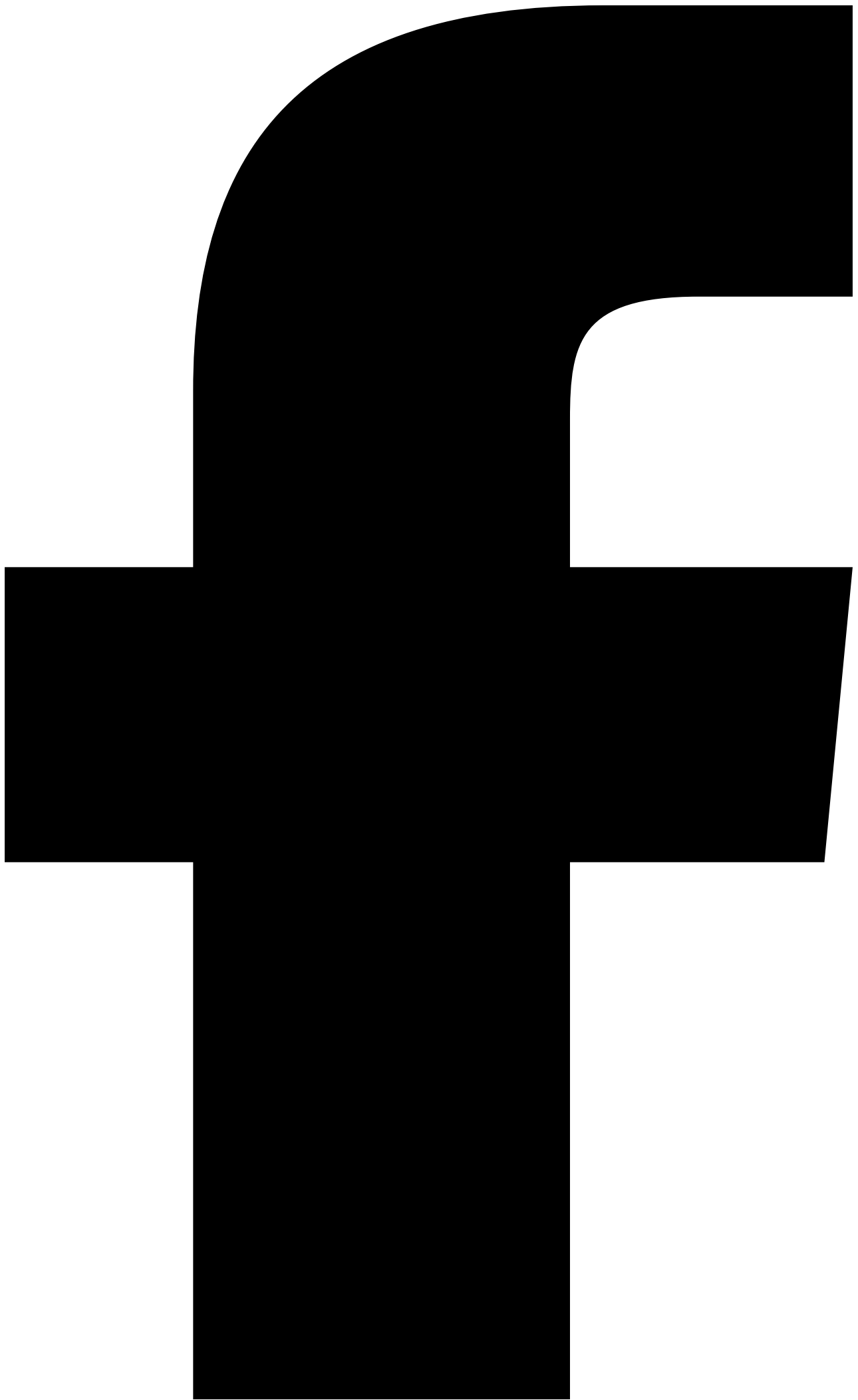
The other alternative is to claim for the lost holiday on insurance but this will be more complex because of the variety of policies.

Many policies won't cover you for not getting to the airport on time – which could be an issue if activists block entrances or roads leading to them.

But Mr James said it would be 'outrageous' if they did refuse to pay out in such a scenario.

'Insurance policies are here to cover you for situations like this,' he said.

'If they refuse, take it to a financial ombudsman.'







Previous protests by the group have included halting traffic on busy roads, targeting an Ashes Test match at Lords and vandalising paintings at the National Gallery.

Ms Rumbelow said: 'We've all in this room disrupted ordinary people in the roads... disrupted ordinary people seeing cultural events, theatre, art shows, football games.

'The plan... could involve disrupting people on their holidays as well as business flights. It's not comfortable to disrupt ordinary people, but it's completely necessary because without that disruption we don't get anywhere.'

She concluded: 'Hope to see you in the summer on the runway.'

The Mail on Sunday recently exposed the activists' sinister plan to target MPs outside their homes. Last year, the MoS thwarted the plot by Animal Rebellion extremists to halt the Grand National at Aintree by storming the racetrack.

The latest plot is part of an overhaul of the structure of Just Stop Oil (JSO), with the formation of a new organisation called 'Umbrella' under which JSO will be one of four wings. It will also include a youth wing called Youth Demand, a political wing – Assemble – and one for socio-economic issues called Robin Hood.

Speaking about Youth Demand, JSO member Sam revealed: 'We're going to bring the fight to the politicians and the political parties.'

'High-profile actions are going to be happening in March against politicians... and in April we've got this four-day action phase. I'm not going to say the details because we want them to be nice and unprepared waiting for us.'

Private jets and newspapers could be targets under the Robin Hood actions.

One activist, Mel, said: 'Ideas are maybe mass actions at financial institutions, maybe hitting places where billionaires go [such as] private airports and other eye-catching locations... yacht showrooms, is that a thing?'

'The final idea is something around the failings of the billionaire-owned press. We should be blocking the printworks or marching on News International... I'm sure you've got some ideas.'

JSO's political 'pillar', Assemble, is looking at standing independent MPs at key constituencies that Labour needs to win in the General Election, and forming a 'House of the People' to be sworn in on the same day as the House of Commons.

Last night, Tory MP Gareth Johnson accused the group of 'targeting happiness with misery'.





'They are creating misery for people trying to go about their daily life and get a well-earned break with their family and children.'

'All it will do will make people angry with them and their cause. Everyone wants a clean environment but this is not the way. Running on to runways and climbing on the planes also sounds extremely dangerous and could risk lives.'

A JSO spokesman said: 'This summer, we will take action at airports to create enormous disruption and do what the rich and powerful won't: face the climate emergency and end fossil fuels.'

A spokesman for the Airport Operators Association, the trade body for UK airports, said: 'Aviation is working hard to decarbonise its activities... Instead of engaging in damaging and disruptive stunts like this, we'd call on environmental groups to work with the industry.'

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Defendants

AW19

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# Now they're after Brits' holidays! Fury over Just Stop Oil's new plot

Protesters plan to halt airports this summer as they glue themselves to runways, climb on planes and storm terminals.



[Just Stop Oil](#) protesters have been called "selfish" as they unveil new plans to ruin holidays for Brits as they storm airports this summer.

According to [The Mail on Sunday](#), protesters want to put airports to a standstill as they demand change from the Government, which has condemned their actions.

The group regularly causes havoc for motorists, glueing themselves to roads and halting traffic for hours. Earlier this year, the group protested outside [Farnborough Airport](#) as they hit out at billionaires using private jets.

Now, their summer plot has been revealed as MPs call the group "selfish" and "dangerous". Home Secretary [James Cleverly](#) called it "unacceptable guerrilla tactics" and vowed they "must be stopped".

Phoebe Plummer - one of the activists who has become a poster girl for the group - told a JSO meeting about the "radical, unignorable disruption" that could cause chaos to flights around the world.

According to [The Mail on Sunday](#), the group will glue themselves to runways, hold terminal sit-ins, and climb on to jets.

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."

Suggesting how to proceed with the plan, she said the group could cut through fences, glue themselves to runway tarmac, cycle in circles on runways, climb on to planes to prevent them from taking off and stage sit-ins at terminals "day after day" to stop passengers from getting inside airports.

Yesterday, Clive Wratten, of the Business Travel Association, urged JSO to reconsider the chaos and said they should join airlines and their supply industry "in bringing forward sustainable fuels and best practices".

## **Trending**

He said it will "alienate the people who can bring the change Just Stop Oil wants".

Tory MP for Dartford Gary Johnson called the plans dangerous and selfish. He said: "Most people want to see the environment protected but militant, highly disruptive protests just anger those who are often just trying to enjoy a family holiday."

Phoebe, 22, hit headlines after it was revealed she grew up in a £4million Chelsea mansion and went to a £45,000 private school in Ascot.

But she's already been arrested for a number of incidents, with her most recent being for throwing Heinz soup at Vincent van Gogh's painting Sunflowers.

# Just Stop Oil eco-protesters plot campaign of airport disruption in threat to summer holidays



[Just Stop Oil](#) are planning a series of [protests](#) at [airports](#) across the UK and Europe which threaten to cause travel chaos for holidaymakers this summer.

Protesters plan in some cases to glue themselves to runways in the UK and other destinations including Spain, Greece and Turkey.

Hundreds of [flights](#) could be delayed by hours or even cancelled as part of the plot by 50 activists, according to the Mirror.

[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.



A performance of Les Misérables at the Sondheim Theatre was stopped when Just Stop Oil activists stormed the stage on October 5 last year (Just Stop Oil/PA)  
PA Media

Clive Wratten, of the Business Travel Association, said: “These planned protests are a blunt instrument that will alienate the people who can bring the change Just Stop Oil wants. The activists should work with British businesses to create meaningful solutions to our climate crisis.

“They should join airlines and their supply industry in bringing forward sustainable fuels and best practices, and we urge protesters to reconsider chaos bringing progress to a standstill.”

Home Secretary James Cleverly said: “Selfish, disruptive protesters who wreak havoc in people’s everyday lives must be stopped. We have given the police more powers to tackle criminals posing as protesters and are backing officers with the tools they need to prevent serious disruption and disorder. More than 600 protesters were arrested during Just Stop Oil’s latest campaign.”

Conservative MP Gary Johnson told the Mirror: “The actions of Just Stop Oil are counterproductive and put people off their cause. Most people want to see the environment protected but militant, highly disruptive protests just anger those who are often just trying to enjoy a family holiday.”

However a [Just Stop Oil](#) spokesman said UK government policy on climate change meant the group’s actions were justified.

They said: “In normal circumstances, the sort of activities you’ve outlined would be unacceptable. However, what is more unacceptable is the last 10 straight months of record-breaking temperatures, governments continue to allow more oil and gas drilling. The situation is an emergency and we have to start acting like it.”

More than half of British people plan to travel abroad this summer and three in five have already booked, according to Post Office Travel Money.

Just Stop Oil was founded in 2022 to try to cease the issuing of all new oil, gas and coal licences in the UK.



It has staged dozens of high profile protests, many involving disrupting London traffic.

It has also targeted an Ashes Test match at Lords and [members ran on stage during a performance of Les Miserables in the West End.](#)

# Just Stop Oil protesters to chill on yoga trip as they plan summer airport chaos

Just Stop Oil protesters are going on a yoga retreat to help get them in the right state of mind for their "biggest action yet" where they are expected to disrupt airports this summer

[Just Stop Oil](#) protesters will relax on a [yoga](#) retreat before disrupting airports this summer.

The eco campaigners plan to take a break in order to mentally prepare for their “biggest action yet”. It comes after we revealed a plot to halt flights both in the UK and Europe from mid-July.

Our reporter recently attended a meeting where 50 campaigners gathered. One said: “It’s time for us to prepare ahead of this summer. There will be yoga, meditation and time to chill out together and support each other... it’s for people who are very involved in JSO.

*Just Stop Oil activists and other protesters marching in Westminster (*

*Image:*

*Vuk Valcic/SOPA Images/REX/Shutterstock)*

“Some of us will car share and I should think others will get there by train. The coming months will be a lot, and it’s important for people who’ve made the commitment to take some time out.” The group is currently crowdfunding, but it is not known if this will cover the bill for their weekend away.

Activists plan to glue themselves to runways and clamber on to planes in tourist hotspots like Spain, [Greece](#) and Turkey. [Just Stop Oil](#)’s Phoebe Plummer was applauded as she discussed the “summer strategy” at the event in Central London this week.

*Climate activists from 'Letzte Generation' blocked runways at Hamburg and Düsseldorf airports*

The 22-year-old told the meeting: “Flights operate on such a tight schedule to control air traffic... we’re talking about disruption on a scale that has never been seen before. 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 wealth inequality and if we want to create change, we need to adopt a more radical demand.”

Just Stop Oil said: “We have had runaway record temperatures the last 10 months. Meanwhile, the High Court has declared the Government’s climate policy unlawful for the second time. Politics is failing and it’s time we step into action to do something about it.”

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Defendants

AW20

This is the exhibit marked “AW20” in the witness statement of Alexander James Wright.

## Summer 2024 Actions

**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**

ADD YOUR  
NAME HERE

First Name \*

Last Name \*

Email \*

Not in GB?

Mobile Number \*,

REGION \*

London

City \*

BOROUGH, IF IN LONDON \*

ARE YOU A YOUNG  
PERSON? \*

No

ARE YOU WILLING TO RISK  
ARREST

- ☐ Yes
- ☐ Yes, to the point of prison
- ☐ Maybe, I need to hear more

happen. Are you ready to join the team?

SPONSORED BY



Just Stop Oil

☐ No

*We may reach out via text or phone to talk about our airport actions. You can always text back STOP to unsubscribe.*

ADD YOUR NAME

You may receive email updates from *Just Stop Oil* , the sponsor of this form.

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Defendants

AW21

This is the exhibit marked “AW21” in the witness statement of Alexander James Wright.



# Cat’s out the bag. Just Stop Oil will take action at airports ✈️

By Just Stop Oil  
📍 United Kingdom

951 1999  
Supporters Shares

Share

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**.

£24,285  
Raised of £50,000

Donate now



We don't store your card details. All donations are processed securely by our PCI-compliant payment partners, Stripe and PayPal.



Just Stop Oil will have quick and easy access to your donation.



We've helped empower over 15,000



Ordinary people taking action at airports across Europe








we've helped empower over 13,000 campaigners like Just Stop Oil by helping them raise the funds they need.

# Governments promised to stop heating at 1.5°C. They've now failed us all.












In 2016, leaders came together and promised to keep heating under 1.5°C as part of the Paris

Read more

## Supporters (951)

	<b>Neil Green</b> - 1 day ago	£5
	<b>Melissa Birch</b> - 1 day ago	£5
	<b>Sian Gifford</b> - 6 days ago	£10
	<b>Anonymous</b> - 7 days ago	£5
	<b>Siobhan Harris</b> - 7 days ago	£20
	<b>Caron Hunt</b> - 8 days ago	£36
	<b>Jenny Edwards</b> - 8 days ago	£10



	<b>Jenifer Devlin</b> - 10 days ago	<b>£25</b>
	<b>howard pilott</b> - 11 days ago	<b>£10</b>
	<b>Emily Heath</b> - 11 days ago	<b>£20</b>
	<b>Stephen Powell</b> - 11 days ago	<b>£5</b>
	<b>Ricky May</b> - 16 days ago	<b>£25</b>
	<b>Anthony Ingle</b> - 17 days ago	<b>£10</b>
	<b>Stephen Hughes</b> - 18 days ago	<b>£10</b>
	<b>Chris Easton</b> - 19 days ago	<b>£5</b>
	<b>Rebecca Manson Jones</b> - 19 days ago	<b>£5</b>
	<b>Robin Leanse</b> - 19 days ago	<b>£10</b>
	<b>Veronique Zuida</b> - 19 days ago	<b>£10</b>

[View more supporters](#)

# Team

	<b>Just Stop Oil</b>		<b>Jacob</b>
	<b>Kier</b>		<b>Suella</b>

Mission

- Our Story
- Team
- Careers

How it works

- The Crowdfunding Academy
- The Crowdfunding Guide
- Video Series
- Community Workshops

Features

- Crowdfunding
- Peer to Peer Fundraising
- How Much It Costs
- Compare Us

Stay Updated

- Blog
- News Stories

Language

English

Discover

- All Issues
- Health and Medical
- First Nations
- Social Welfare
- International Development
- Animals
- Social Enterprise
- Refugees and Asylum Seekers
- Environment
- Schools and Education
- Women and Girls
- Sports
- LGBTIQA+
- Volunteering
- Politics
- Community

Help

- Ask The Community
- FAQs
- Ask Chuffed

- Terms & Conditions
- Privacy Policy

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Defendants

AW22

This is the exhibit marked “AW22” in the witness statement of Alexander James Wright.

# Just Stop Oil protesters who sprayed Stonehenge are bird-watching Oxford student, 21, and Quaker, 73

Police have arrested six [Just Stop Oil](#) activists at a supposed soup night in [London](#) this evening.

Hackney Police has detained a number of key organisers for the group who had allegedly been plotting to cause mayhem for thousands of holidaymakers this summer by disrupting airports across the UK.

Officers swooped on an east London community centre earlier today and arrested six activists during an event which JSO later claimed was a 'soup night'.

The eco group also claimed another protestor named Daniel was arrested whilst staying at their parents home in the capital.

Protesters had allegedly planned to disrupt airports in a 'sustained period of action', warning that an attack on Stansted airport last week, where two private jets were sprayed in orange paint, was just a 'prelude'.

JSO shared a video on X, showing the moment the suspected organisers were arrested earlier this evening.

One officer is heard telling one of the group: 'By taking part in the organisation of this event this evening, I suspect you are taking part in a plot to cause serious disruption to UK airports.'

A female activist is then seen being led out of the hall in handcuffs as she is surrounded by several officers and other members of the public.

The video later cuts to a video of an activist, named Daniel, being arrested in a house by two police officers.

Daniel can be heard telling the camera: 'I'm being arrested. I'm not really sure why.'

'I'm at my parents' house right now. I was just here in London visiting my parents.'

'I think I've been told I'm under arrest for conspiracy to commit a public nuisance.'

'Well this is what happens when you resist the British state.'

Hackney Police said in a statement: 'Tonight (27 June), our officers made six arrests during an event at an east London community centre.'

[Read More](#)



'We believe some of those in custody are key organisers for Just Stop Oil.

'All the arrests were under a section of the Public Order Act which makes it illegal to conspire to disrupt national infrastructure.

'We continue to work with airport operators and others to prevent significant disruption.

'Activists do not have the right to commit criminal acts that may also endanger themselves and others.

'Anyone who disrupts the safety and security of an airport can expect to be dealt with swiftly and robustly.'

The climate group has made headlines in recent weeks for its latest stunts including spray painting Stonehenge and spraying two private jets at Stansted airport.

But according to a source, the stunt at Stansted was only a 'prelude' to plans to disrupt even more airports over the coming months.



Speaking to The Times, the source said: 'This is just another way of us taking action in the theatres of life we exist in because we're not politicians.'

'Private jets are obviously mental for emissions and most people would agree they need to stop.'

'It's a wake-up call for government that we need big radical changes.'

'If this incoming government doesn't get us on war footing then we're not going to have anywhere to fly to.'



A JSO spokesman told MailOnline: 'We have smashed through the 1.5 degree threshold that was supposed to keep us safe, the consequences of this are catastrophic and this is leading to runaway extreme temperatures that are making large parts of the world unable to support human life. We cannot continue business as usual.'

'To protect our families and communities we need an emergency, international legally binding treaty to phase out fossil fuel burning by 2030.'

When asked whether they would disrupt people's summer holidays, the spokesman said: 'We will be taking action at sites of key importance to the fossil fuel economy to demand an emergency, international legally binding treaty to phase out oil, gas and coal burning by 2030.'



Last week two JSO activists were also arrested and later bailed for throwing orange powder paint at Stonehenge.

Rajan Naidu, 73, and Niamh Lynch, 21, ran up to the stones and attacked them as members of the public tried to intervene.

Video footage showed two people wearing white shirts with the Just Stop Oil slogan, approaching the stone circle with canisters and spraying orange powder paint.

The group claimed it would wash off in the rain but archaeologists are concerned about potential damage to the 5,000-year-old world icon and landmark.

Tim Daw, a local farmer and historic property steward who used to volunteer at the site, carried out an experiment by mixing cornflour and food dye and then applying it to a small piece of sarsen, which is the same stone as Stonehenge.

On the piece of sarsen a series of little black dots are visible, which are the lichen.

Mr Daw described this on BBC Breakfast as a 'very, very rare plant organism that grows on rocks' which 'takes hundreds of years to grow because there's no nutrition'.



He then washed the bottom half of the stone before gently rubbing it and noticed that the cornflour was in the stone's pores and therefore 'displacing the lichen'.

Mr Daw told the show that he was 'worried' about the lichen on the monument, and said of yesterday's attack: 'I was shocked and saddened. I couldn't believe it.'

'Stonehenge is so precious, not just to me but to so many people. To do this act, which I think has worked against their cause, just seems pointless and damaging.'

Rishi Sunak and Sir Keir Starmer were united in the condemnation of Just Stop Oil after the incident.

The Prime Minister described it as a 'disgraceful act of vandalism' while the Labour leader branded the group 'pathetic'.



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Defendants

AW23

This is the exhibit marked “AW23” in the witness statement of Alexander James Wright.

# Munich Airport forced to close for two hours after climate protesters glue themselves to runway

The airport in southern Germany was closed to take-offs and landings for nearly two hours but has since reopened.



Image: The protesters (in orange) began their action at about 4.45am local time Pic: AP

Eight climate protesters have been arrested after shutting down Munich Airport and causing about 60 flight cancellations.

Six of the activists glued themselves to a runway access road early on Saturday morning, but the situation is now under control with both runways open.

Climate protest group Last Generation took responsibility in videos on X showing its members wearing orange vests on the tarmac.

"A total of six people are sitting in two groups on different locations of the Munich airport," one of the posts said.

"It is absurd that people can afford flights more than train journeys," said another post from the group.

"The responsibility for this lies with the government: it subsidises flights while the railways are ruined by cost-cutting."

An airport spokesperson said it had been fully closed to take-offs and landings for nearly two hours.

Some 11 flights were also diverted, around 60 cancelled, and delays were still possible, the spokesperson added.

The disruption occurred during one of the busiest travel periods, second only to the Easter holidays, according to the airport.



Image: Pic: AP

### Read more from Sky News:

#### [Just Stop Oil protesters in their 80s target Magna Carta](#)

Interior minister Nancy Faeser said security would be reviewed and "the perpetrators must be vigorously pursued".

"Such criminal actions endanger air traffic and harm climate protection because they only cause contempt and anger," she wrote on X.

Volker Wissing, the transport minister, said new laws were needed to increase punishments for such protests, which are currently only classed as minor offences.

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Defendants

AW24

This is the exhibit marked “AW24” in the witness statement of Alexander James Wright.

# Farnborough airport and its super-rich clients like Boris Johnson just got the Extinction Rebellion treatment

An outer London airport – Farnborough – frequently used by the super-rich and politicians, [including Boris Johnson](#), has been the target of [Extinction Rebellion](#) and other groups. They highlighted how the flying habits of the super rich are effectively helping to kill us all via their contribution to the [climate crisis](#).

## Farnborough: you're killing us all!

On Sunday 2 June, a group of activists blocked all the main gates of Farnborough airport, the biggest private jet airport in the UK, which has [plans to greatly expand](#). This was part of an international week of action targeting private jets and the injustice of aviation, with protests happening in Denmark, Germany, Mexico, Norway, Sweden, Switzerland, and the US.

At Farnborough, protesters barricaded the airport's Gulfstream Gate with the Extinction Rebellion pink boat:



Ively Gate had four protesters locked on to oil drums:





At the airport’s departure gate activists mounted two tripods blockading the entrance:



A fourth group of protesters moved between the airport’s other gates to block them:





At all three main gates, protesters released colourful smoke flares, chanting slogans and engaging with members of the public, accompanied by the XR Rebel Rhythms band of drummers:



Dr Jessica Upton, a veterinary surgeon and foster carer from Oxford, said:

*I'm here today because private airports are an abomination. Expanding Farnborough would be putting the indulgent wants of the rich minority over the needs of the majority. Local*

*people need cleaner air and less noise pollution, and the world's population urgently needs rapid reductions in greenhouse gas emissions to survive.*

*Private airports disproportionately contribute to climate breakdown and closing them would boost our chances of sticking to the Paris Climate Accords, the supposedly legally binding international treaty agreed to and signed by our government.*

More than 100 people took part in the protests and several were arrested.

## **Farnborough airport: private jets should be banned**

Inês Teles, campaigner at Stay Grounded, said:

*It's utterly obscene that, during a climate and cost of living crisis, while people are burning under scorching heat in India and Mexico or being displaced by catastrophic flooding in Brazil, the super-rich keep flying on their private jets and pouring gas in a world on fire.*

*These are the worst form of bullshit flights, and need to be banned, as well as short-haul flights or night flights. We need to stop this madness and hold the super-rich and institutions accountable for the destruction they are causing.*

The actions happened under the banner of the Make Them Pay campaign, supported by Stay Grounded, Scientist Rebellion, and Extinction Rebellion groups. It unites citizens and scientists from around the globe behind three demands:

1. Ban Private Jets
2. Tax Frequent Flyers
3. Make Polluters Pay

Gianluca Grimalda, university researcher and climate activist, said:

*Private jets are the single most polluting form of transport, causing about 10 times more CO2 emissions per passenger than a regular flight, and up to 100 times more than trains. About two thirds of such flights are done for leisure over short stretches on which a lower-emitting alternative exists.*

*The 'collateral damage' of such flights is to cause about 20.000 deaths every year, as we know that every 4.000 ton of CO2 will kills one person and private jets produce about 80 million tons of CO2 every year. This is unacceptable, inhumane, and abhorrent.*

## **Aviation is the pinnacle of climate injustice**

But private jets are not the only problem: aviation as a whole is the pinnacle of climate injustice, with 1% of the population being responsible for 50% of its emissions and 80% of the world population never having set foot on a plane.

As the world witnesses the announced death of the 1.5° C barrier, scientists and people worldwide call for a full shift in terms of how society relates to aviation and other high emission sectors, to be able to avert the worst effects of climate breakdown which, while affecting everyone, will be even more deadly for the poorest and most vulnerable parts of society.

The rich need to step up and cut superfluous habits such as using private jets, if the entire society is to support a move towards the necessary change.



A report by Oxfam highlighted that the [richest 1% grabbed nearly two-thirds of all new wealth created since 2020](#), totaling \$42 trillion, almost twice as much money as the bottom 99% of the world's population.

The demands of the Make Them Pay campaign seek to pave the road towards a fairer wealth distribution: an annual wealth tax of up to 5% on the world's billionaires could raise \$1.7 trillion a year, enough to deliver a 10-year plan to end hunger, support poorer countries being ravaged by climate impacts, and deliver universal healthcare and social protection for everyone living in low-income countries.

Climate inequality is one of the world's most pressing problems, and questions of social and economic justice must be at the heart of how we act on the climate collapse.

*Featured image and additional images via Extinction Rebellion*

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Defendants

AW25

This is the exhibit marked “AW25” in the witness statement of Alexander James Wright.



# Climate activists target private jet airports and demand ban at Cop27

Protesters gather at Farnborough and Luton as part of global action, also calling for tax on frequent fliers

[Cop27 live - latest news updates](#)



Activists from Extinction Rebellion and Scientist Rebellion at Farnborough airport. Photograph: @XrSouthEastUK/Twitter

Climate activists have blocked entrances to two of the UK’s premier private jet airports as part of a global wave of action against private aviation timed to coincide with [Cop27](#).

The activists, from [Extinction Rebellion](#) and Scientist Rebellion, staged blockades at Farnborough airport, in Hampshire, and London Luton airport’s Harrods terminal on Thursday morning.

Similar protests were taking place at terminals in Berlin, Milan, Stockholm and Trondheim as part of a coordinated campaign planned in 13 countries targeting the private aviation industry. Activists also struck at Ibiza and Melbourne on Wednesday, and [Amsterdam on Saturday](#).



Activists from Extinction Rebellion, Scientist Rebellion and Last Generation blocking the entrance of an airport facility in Milan. Photograph: Piero Cruciatti/AFP/Getty Images

Data from FlightRadar showed 36 private jets landed at Sharm el-Sheikh between 4 and 6 November, and 64 flew into Cairo, 24 of which had come from Sharm el-Sheikh, [BBC News](#) reported on Thursday.

Extinction Rebellion said: “The campaign is targeting the climate-destroying, jet-setting lifestyles of billionaires and multimillionaires, which are exacerbating climate breakdown and condemning the global majority to a lifetime of poverty.”

The activists said they were calling on dignitaries gathering at Cop27 to ban the use of private jets, which they said were five to 14 times more polluting per passenger than commercial planes, and 50 times more polluting than trains.

XR added: “Campaigners are also demanding a tax on those who fly frequently to cut emissions and help raise funds to pay for the loss and damage caused by climate breakdown.”

Bedfordshire constabulary said the protests at [Luton](#) had little impact, with protesters arriving at 7.15am and leaving by 10.15am. “No arrests, no ongoing disruption; they turned up, gave some leaflets out and left,” said a spokesperson.

Hampshire constabulary said they were aware of a protest at Farnborough, and that the force was in contact with staff at the airport to “ensure health and safety” and monitor “the impact on the local community if necessary”, although officers were not on the scene.

“Everyone has the right to free speech and protest,” the force’s spokesperson said.

Officers were on the scene at various locations on the M25, however, where Just Stop Oil activists continued their disruptive protests for a fourth day. Supporters of the climate “civil resistance” group again stopped traffic by climbing on to gantries in multiple locations - in spite of a promise by police that officers were “ready to respond to any criminality” on London’s orbital motorway.

Among those taking action on the M25 on Thursday was Phoebe Plummer, who gained notoriety after she [threw tomato soup on Van Gogh’s Sunflowers](#) in the National Gallery in London last month.

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# Climate activists glue themselves to runway at Berlin airport

A judge says the resistance of activists may be justified due to the climate emergency - because the consequences of failing to act are "so serious".



0:33

Climate protesters broke on to a runway in Berlin's Brandenburg Airport and glued themselves to the tarmac, causing its temporary closure and delays to flights.

Berlin police said they encountered "several people" in an area not open to the public, after activists gained unauthorised access, with some gluing themselves to the ground.

Activists from the Last Generation environmental group, who say a 70-year-old man was among those involved, were also seen riding bicycles across the shunting area - bringing air traffic to a standstill.

Video footage shows members of the group climbing through a wire fence that had been cut to access the runway.

The group called on the public to stop travelling by air and on the government to stop subsidising it.

Last Generation said in a statement: "The plane is not a means of transport for ordinary people. Most people - around 80% - have never flown.

"One affluent percent of the population is responsible for around half of flight-related greenhouse gas emissions".



Image: Pic: Letzte Generation/Reuters

The airport said flights were resuming with some delays after it was forced to close its runways.

A spokesperson for the airport said the activists had entered from two points in the north and south, and police had detained them. They added that they could not say how many flights were affected.

Flight tracking website FlightRadar24 showed some aircraft that were originally heading to the airport changed their route.

Michael Hassemer, a judge at the Rhineland-Palatinate Constitutional Court, said he considered the resistance of the Last Generation justified by climate emergency.

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He said: "The consequences for humanity of failing to take climate protection measures are in any case so serious that legal impairments through protest are justified to a certain extent by emergency and are therefore acceptable."

#### **Read more:**

**[Just Stop Oil activist compares himself to Martin Luther King in court](#)**  
**[Protesters throw tomato soup over Van Gogh's Sunflowers masterpiece](#)**

Some 13 flights had been diverted to airports in the eastern state Saxony by 5pm GMT, RBB broadcaster reported, citing Mitteldeutsche Flughafen AG, the company that operates the airports in Dresden and Leipzig.

The protest, the latest by climate activists in Germany, also urged the government to expand cheap train travel offers.

# **LOVE IN ACTION: Extinction Rebellion blockades Luton Airport private jet terminals in Valentine's Day protest - Extinction Rebellion UK**



## **LOVE IN ACTION: Extinction Rebellion blockades Luton Airport private jet terminals in Valentine's Day protest**

February 14, 2023 by Extinction Rebellion

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#ExtinctionRebellion #LoveInAction

This morning, Extinction Rebellion and affiliated groups have blockaded the entrances to Luton Airport's Harrods Aviation and Signature private jet terminals to demand the government take urgent action to ban private jets, tax frequent flyers and make wealthy polluters pay.

The protest is part of a global co-ordinated action launched last week by climate activists across 11 countries, which is targeting multiple sites in Europe, Australia, New Zealand, and the US.

Groups chose to take action today due to the rise in the use of private jet flights for supposedly romantic Valentine's Day dates, and to invite anyone watching to go to Parliament from April 21st to be part of 100,000 people calling for a citizen-led transition away from fossil fuels.[1]

*"Valentine's Day should not have to cost the Earth, or the taxpayer," says former airline pilot-turned climate activist, Todd Smith. "The people want a ban on private jets, as Climate Assembly UK demonstrated in 2020. [2] But nothing has been done. I can only assume the government has ignored the will of the people to protect the interests of their rich mates. We are here today to make them listen."*

Extinction Rebellion's iconic blue boat *Polly Higgins* is blocking all three gates to Luton Airport's Signature Terminal with protestors locked on to the deck and hull of the boat.

Another group of protestors is barricading the entrance to the Harrods Aviation Terminal, with activists locked onto two oil barrels.

More activists are gathered at both terminals dressed in hi-vis jackets, holding flags and banners in the style of airport signs, and wearing pink vests reading "LOVE IN ACTION".

Today's protest is part of the ongoing "Make Them Pay" campaign by Scientist Rebellion, Extinction Rebellion (XR), and Stay Grounded which has three key demands: ban private jets, tax frequent flyers and make polluters pay. [3]

*Nigel Harvey, 60, a recycling company chief executive and XR activist from St Albans, added: "Extinction Rebellion and other climate activist groups are often criticised for disrupting the lives of 'normal working people' – well it should be clear that owning a private jet isn't normal. This is a targeted action – we're disrupting only the top 1%: the highest-income, highest emitters who are most responsible for pollution and have the most power to affect changes."*

1% of the global population produces over a half of total aviation emissions [4], while 80% of the global population have never actually stepped foot onboard an aircraft [5]. Private jets are around 10 times more energy-intensive per passenger than commercial planes and 50 times more energy-intensive than trains. A four-hour flight in a private jet emits as much as the average person does in an entire year. Yet private jet use remains subsidised and untaxed [6].

*Sarah Hart, 41, mum of two from Farnborough said: "The fact that our government turns a blind eye on these polluters is just further evidence of its failure to act on the climate & ecological emergency. We are calling for everyone to join us from 21 April outside the Houses of Parliament to make our voices heard and demand action on the climate & ecological crisis NOW."*

Last year the Least Developed Countries (LDC) group representing the most climate-vulnerable countries at COP27, proposed a global aviation tax to pay for a climate 'loss & damage' fund for their countries [7] and cancel debt in the countries most affected by climate change so that they can afford to transition to low-carbon economies [8].

*Finlay Asher, 32, an aerospace engineer from Bristol and co-founder of Safe Landing [9] said: "I'm an aviation worker – but feel that I can't stand-by watching the emissions from my industry continue to grow and contribute so heavily to the climate carnage wreaking havoc around the world."*

*These impacts are mostly felt by the poorest communities, so it's sickening to also realise that an elite minority of super-rich mega polluters are responsible for the majority of global emissions from air travel."*

— Ends —



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## Notes for Editors

Press contact for this action: Carol +44 (0)7791 737093

Email: xrsoutheastmedia@gmail.com

Link to photos: <https://show.pics.io/xr-global-media-breaking-news/search?tagId=63ea485fae3e7a001274b450>

## REFERENCES

[1] The Big One <https://extinctionrebellion.uk/the-big-one/>

[2] Multiple citizens' assemblies have produced such recommendations for the aviation sector, including:

- [Climate Assembly UK recommendations](#):
  - *“Ban polluting private jets and helicopters, moving to electric technology as it becomes available”*
  - *“80% of assembly members ‘strongly agreed’ or ‘agreed’ that taxes that increase as people fly more often and as they fly further should be part of how the UK gets to net zero. Assembly members saw these taxes as fairer than alternative policy options.*
- Scotland's Climate Assembly recommendations:
  - *“Eliminate frequent flyer and air mile bonuses to reduce the number of flights taken for business, encouraging the use of alternatives like video conferencing for meetings.” – 92% agree*
  - *“Discourage air travel by introducing a frequent flyer tax or levy.” – 78% agree*
  - <https://involve.org.uk/sites/default/files/field/attachemnt/Scotland%27s%20Climate%20Assembly%20Recommendations%20for%20Action.WebVersion%20%282%29%20%282%29.pdf>
- French Citizens' Convention on Climate:
  - Limiting the adverse effects of air travel: *“Adopt an enhanced eco-contribution per kilometre”, “Increasing fuel taxes for recreational aviation”, and “Promoting the idea of a European eco-contribution” – 88.1% agree.*
  - <https://democracy-international.org/final-propositions-french-citizens-convention-climate>

[3] “Make Them Pay” campaign website: <https://makethempay.info/>

[4] <https://www.transportenvironment.org/challenges/planes/price-of-flying/>

[4] The global scale, distribution and growth of aviation: Implications for climate change <https://www.sciencedirect.com/science/article/pii/S0959378020307779>

[5] <https://www.cnn.com/2017/12/07/boeing-ceo-80-percent-of-people-never-flown-for-us-that-means-growth.html>

[6] “Despite the disproportionate climate impact, private jets are untaxed in most European nations because of exemptions from the EU’s carbon pricing scheme (EU ETS) and untaxed kerosene.”



<https://www.transportenvironment.org/discover/rising-use-of-private-jets-sends-co2-emissions-soaring/>

[7] ‘Loss & damage’ fund could raise more than \$100 billion a year:

<https://www.theguardian.com/environment/2022/sep/19/vulnerable-countries-demand-global-tax-to-pay-for-climate-led-loss-and-damage>

[8] Cancel debt in the countries most affected by climate change: <https://debtforclimate.org/>

[9] Safe Landing: <https://safe-landing.org/>

Explanation of *Frequent Flyer Levy* policy: <https://afreeride.org/>

## ABOUT EXTINCTION REBELLION

- [The Big One April 21st 2023](#) | Find out about our biggest protest yet and to take part!
- [Donate to April 21st](#) | Support the Rebellion
- [What Emergency?](#) | Read about the true scale of the climate crisis
- [XR UK Local Groups](#) | View a map of all local groups
- [XR UK website](#) | Find out more about XRUK
- [XR Global website](#) | Discover what’s going on in XR around the globe!

Time has almost entirely run out to address the ecological crisis which is upon us, including the 6th 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 front-line. No-one will escape the devastating impacts.

Extinction Rebellion believes it is a citizen’s duty to rebel, using peaceful civil disobedience, when faced with criminal inactivity by their government.

### Extinction Rebellion’s key demands are:

Government must tell the truth by declaring a climate and ecological emergency, working with other institutions to communicate the urgency for change.

1. Government must tell the truth by declaring a climate and ecological emergency, working with other institutions to communicate the urgency for change.
2. Government must act now to halt biodiversity loss and reduce greenhouse gas emissions to net zero by 2025.
3. Government must create and be led by the decisions of a [Citizens’ Assembly](#) on climate and ecological justice.

# Climate activists block runways at 2 German airports, disrupting flights for hours

BERLIN (AP) — Climate activists blocked flights at two German airports for several hours Thursday in protest against the most polluting form of transportation, and to demand tougher government action to reduce greenhouse gas emissions.

The group Last Generation said several of its members entered the grounds of Hamburg Airport around 6 a.m. (0400 GMT) and glued themselves to the runway on the first day of the school vacation in the north German city.

Dozens of flights were canceled and 10 arrivals had to be diverted to other airports, Germany's dpa news agency reported.

Members of the group also cut through a security fence at Duesseldorf Airport in the west and blocked an access route to the runway, disrupting several flights before operations resumed.

In a statement, the group accused the German government of lacking a strategy to [tackle the climate crisis](#) and called for immediate measures to cut emissions in the transportation sector, including ending tax exemptions for airline kerosene.

Aviation is responsible for a significant share of global emissions. If the sector were a country, it would rank in the top 10 global emitters, according to the European Commission.

Senior German government officials slammed the protests and called for them to end.

“The Last Generation isn't protecting the climate, they're engaged in criminal activity,” said Transport Minister Volker Wissing, who has blocked several proposals for cutting emissions from road and air travel in recent years.

He and Justice Minister Marco Buschmann, both members of the Free Democratic Party, accused the activists of dividing society by preventing people from flying on “well-earned holidays.”

Last Generation insists its protests are peaceful, albeit disruptive, though motorists facing delays when the group blocks roads have [at times attacked the activists](#).

German prosecutors [raided the homes](#) of several of the group's members in May on suspicion of forming or supporting a criminal organization.

# Climate activists disrupt Logan Airport's 100th anniversary celebration to demand justice for East Boston



On Friday October 13, climate activists from Extinction Rebellion Boston (XR), Airport Impact Relief Inc., Mothers Out Front, GreenRoots, and other members of the Logan Community Clean Air Coalition disrupted the Logan Airport's 100th anniversary celebration in the newly expanded International Terminal E. As more than 500 attendees gathered, including Mayor Michelle Wu and Governor Maura Healey, the activists waved a large colorful banner printed with "Stop Polluting Eastie" and carried a 120-inch inflatable airplane reading "Terminal Illness". East Boston supporters crowded outside the airport's security entrance, chanting in English and Spanish "We shall not be moved / No, nos moverán," and "We are unstoppable, another world is possible." They sang along with live music played by the Boston Area Brigade of Activist Musicians and distributed informational flyers folded into paper airplanes to the event attendees.

East Boston activist Chris Marchi addressed the crowd saying, "We should not congratulate this airport, while it poisons environmental justice communities. We should be avowing to change. Massachusetts needs to stop excusing environmental destruction for pet projects. When will this state's leaders finally disown claims that we need to accept environmental sacrifices for the survival of our economy?"

Before 1923, East Boston featured the massive Wood Island Park, designed by Frederick Law Olmsted, the planner of Boston's "Emerald Necklace". In 1923, the 189 acres of Wood Island Park were destroyed by Massport to build the Logan airport. The airport property rapidly expanded to 389 acres by 1934, 1,489 acres by 1949, 1,509 acres by 1965, and 1,743 acres by 1974. Due to community outrage at the egregious theft of land, Massport started "outsourcing" their expansions to other vendors, leading to "silent airport expansion," making the true size of the airport almost impossible to determine. Today, Boston Logan International Airport emits more than 35,000 pounds of pollution daily and 810,000 metric tons of greenhouse gasses per year. Despite constant pushback from the East Boston community, the airport continues to expand, destroying parks and

living spaces as it grows. For example, one current proposal includes the addition of a 1.8 million gallon fuel tank.

Climate activists disrupted the Logan Airport celebration because they are concerned about the health and wellbeing of the East Boston community threatened by Massport's growth. One East Boston activist commented, "Air pollution is a terminal illness in East Boston. It is time to step up and protest the numerous and continuously increasing harms inflicted on our community. East Boston has been a vibrant immigrant hub for centuries. Like so many cities with similar histories, residents are on the receiving end of systemic environmental injustices. The burden is not bearable anymore." According to a [Logan Airport Health Study](#)<sup>1</sup>, children in East Boston are 4 times more likely to exhibit signs of asthma compared with children in other areas. Adults are twice as likely to show signs of chronic obstructive pulmonary disease (COPD). The neighborhood is a "hotspot" for many different types of cancer<sup>2</sup>, suggesting environmental causes. East Boston has the [lowest tree canopy coverage](#) in the city<sup>3</sup>, due largely to Logan airport. This contributes to many urban heat islands, or hotter temperatures, on average, than most other neighborhoods in the region.

When asked why they participated in this act of non-violent civil disobedience, Mothers Out Front organizer Valinda Chan said, "When I was pregnant with my second child, I spent every day worrying about the possible health impacts of air pollution on my baby. I picked the park I would take my toddler to based on which direction the wind was blowing and the time of day, all in an effort to reduce our exposure. This hyper-awareness eventually took a toll, and I've thought about leaving. But I love the East Boston community. Living in an area with high pollution takes a mental, emotional, and physical toll on residents. But East Boston is our home. We can't and don't want to leave – and we shouldn't have to."

**Demands from Extinction Rebellion Boston (XR), Airport Impact Relief Inc., Mothers Out Front, GreenRoots, and other members of the Logan Community Clean Air Coalition to Massport:**

The climate activists demand that Massport stop the ongoing Logan Airport expansion, and demand that East Boston residents be financially compensated for the pollution that already damages their neighborhood. Activists insist that when creating an impact statement before building, Massport needs to explicitly consider the economic cost of healthcare for Eastie residents, and integrate the healthcare cost into the cumulative assessment of this Environmental Justice community. The activists also demand an immediate halt on construction for the 5th fuel tank at Logan airport, and the "Haul Road" for the airport that is proposed to run through East Boston.

**Background on East Boston activists' community efforts against MassPort:**

This action continues a long tradition of East Boston's community opposition to Logan Airport expansion, and their fight against the ongoing misuse of neighborhood land for egregiously destructive projects like Eversource's new electrical substation. For example, the #NoEastieSubstation campaign demands to move the substation's site to the airport, which is the single-largest electricity user. The substation is an insidious airport expansion planned for a plot of land where the community was promised a park.

Over the past 5 years, Mothers Out Front and Airport Impact Relief Inc. have pushed for air pollution research and advocacy projects, which have leveraged over \$1 million dollars in grant activity to test and implement air quality mitigation and public education work across the region. This research revealed that idling cars at Logan Airport produce 15 million pounds of pollution per year, a figure Massport disputes.<sup>4</sup> According to Airport Impact Relief Inc. spokesperson Chris Marchi, "We have consistently offered opportunities for collaboration with Massport, but have consistently been declined."

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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-

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST 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 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 PROTEST 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 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 PROTEST 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 ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

AW26

This is the exhibit marked “AW26” 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**



**- 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**

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**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](mailto:StuartWortley@eversheds-sutherland.com)  
07712 881 393

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

**Dated: 20 June 2024**

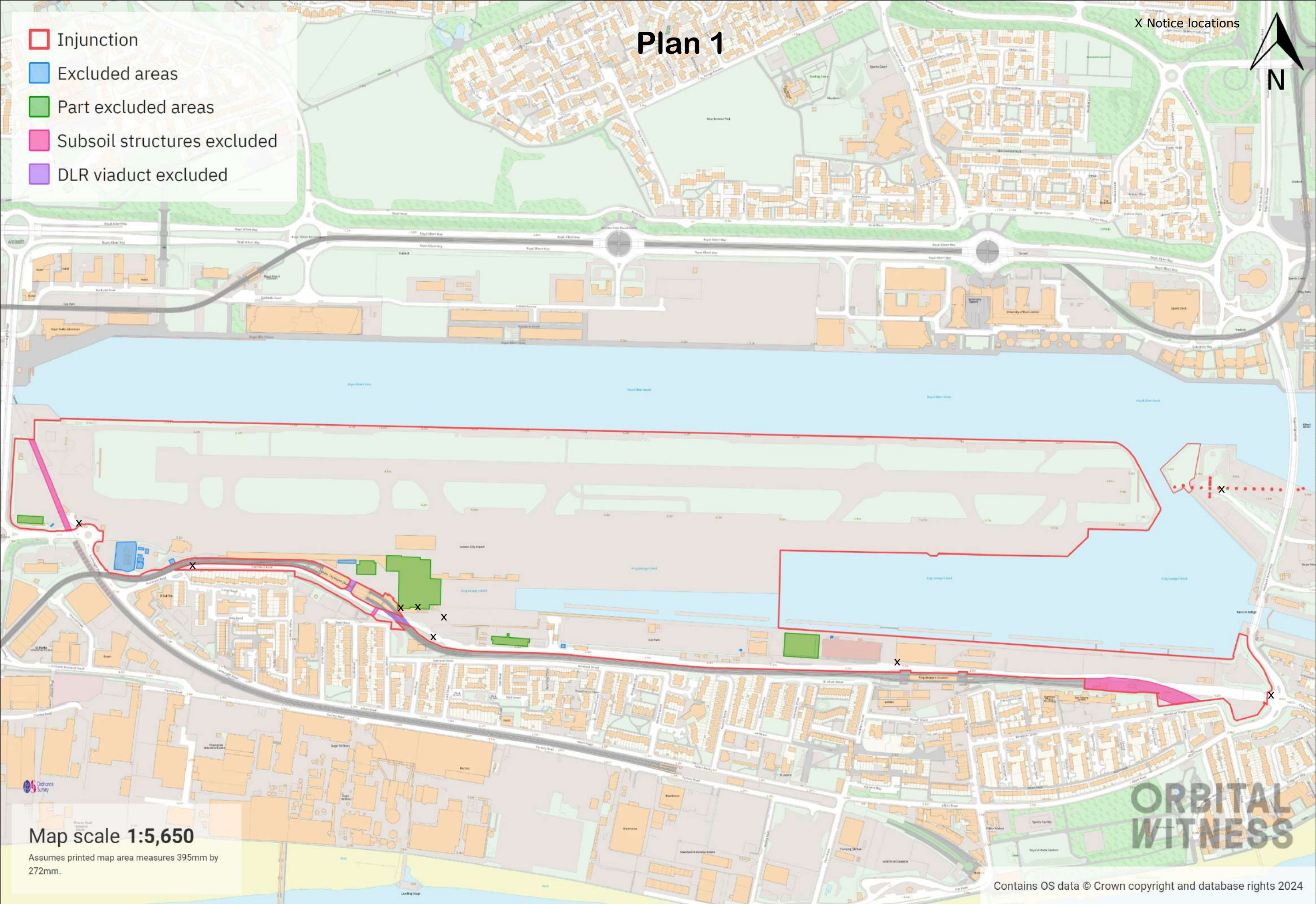
## **SCHEDULE 1 - PLANS**



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

# Plan 1

X Notice locations



Map scale 1:5,650

Assumes printed map area measures 395mm by 272mm.

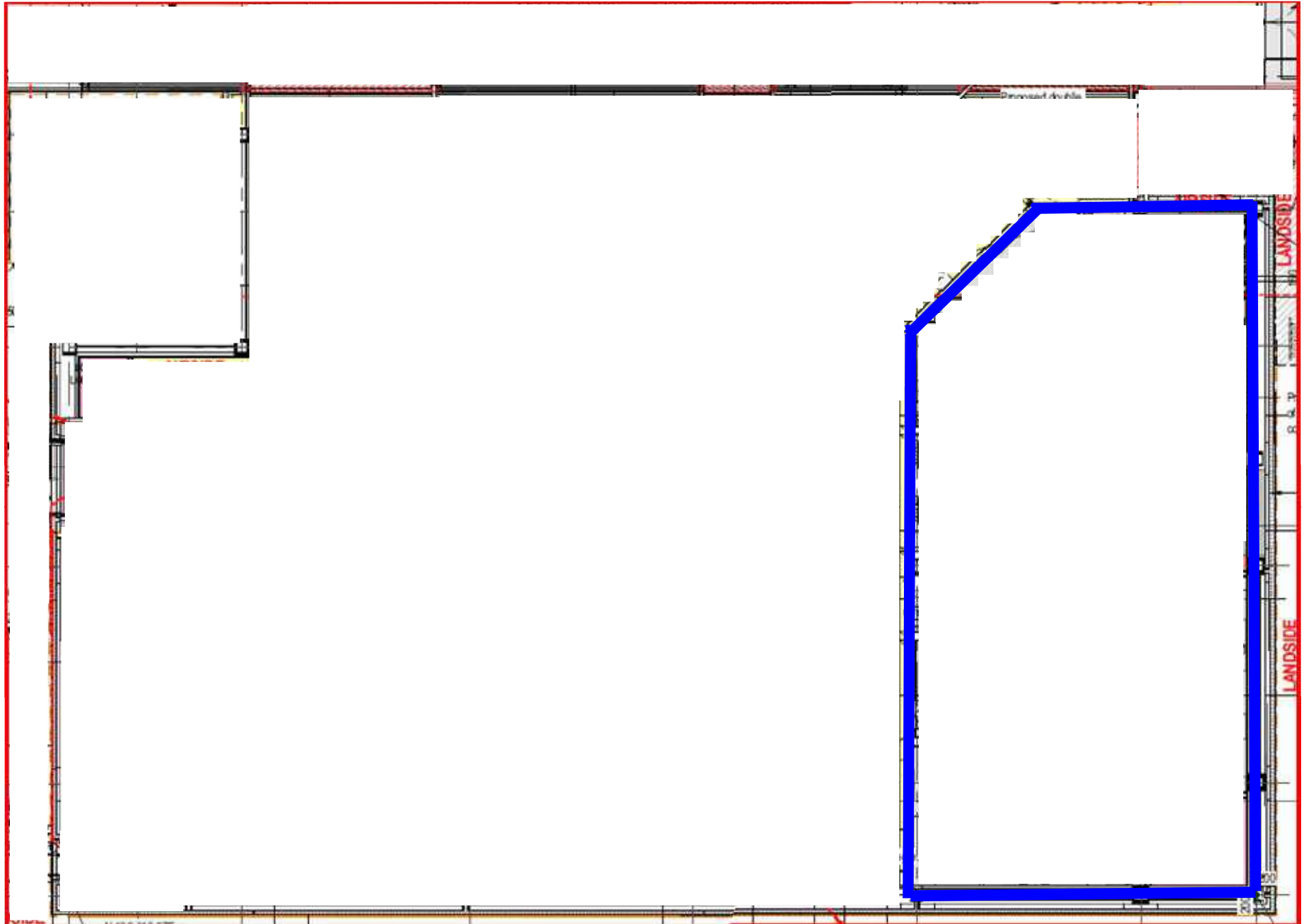
Contains OS data © Crown copyright and database rights 2024





r r r d r

# Plan 3



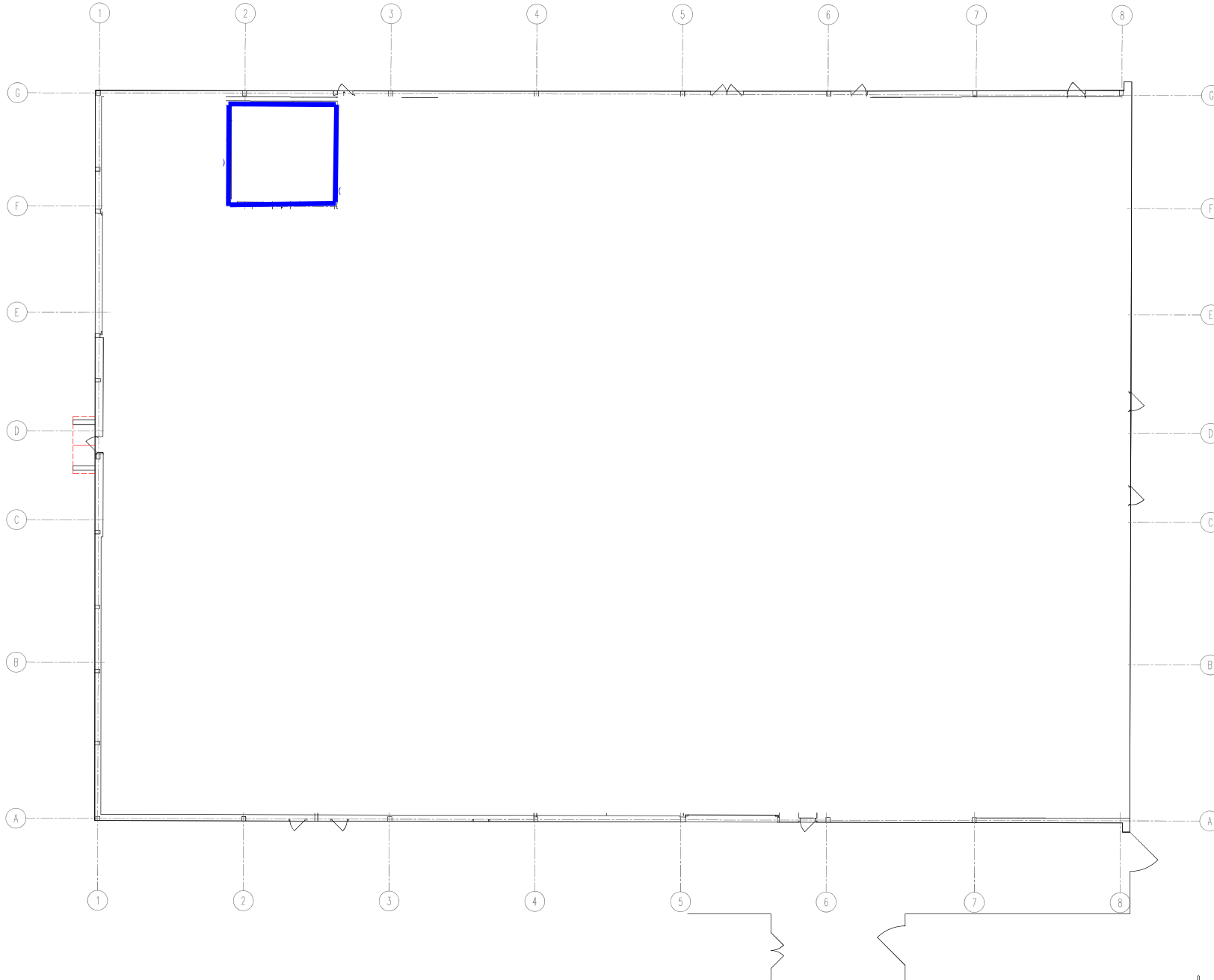
HB-635

HB-635



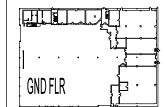
d r d r

# Plan 5



0 1m 2m 3m 4m 5m  
SCALE BAR 1:100 @ A1

B Room Numbers Added	01/11/16
A Door Numbers Added	01/02/16



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

RECORD DRAWING

BLUE SHED

General Arrangement Plan

Drawn: JLB	Checked: VR	Approved: B
Date: 04/08/15	Version: VR	Scale: B
Project: R/BS/G/A/001		Scale: 1:100

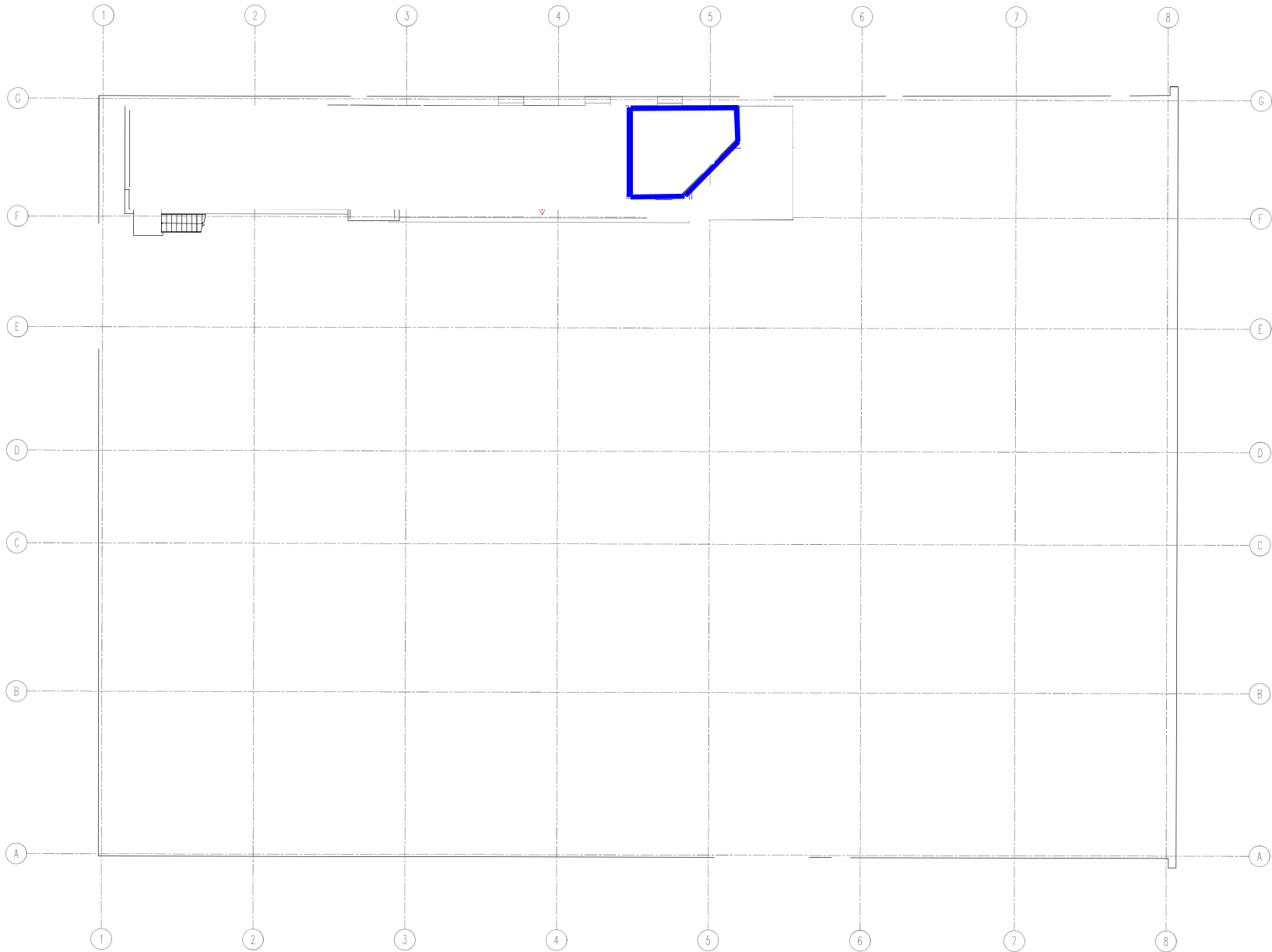
This drawing is the property of the client and is not to be used for any other purpose without the written permission of the client.

HB-637

HB-637

Blue Shed - r Floor

Plan 6



0 1m 2m 3m 4m 5m  
SCALE BAR 1:100 @ A1

DO NOT SCALE - IF IN DOUBT ASK

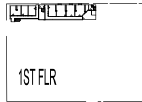
Associated Drawings

General Notes:

LEGEND

XXXX FIRE DOOR  
XXXX STANDARD DOOR

B	Room Numbers Added	01/11/16
A	Door Numbers Added	01/02/16



London City Airport  
Get closer.  
London City Airport, City Aviation House  
Royal Docks, London, E16 1PB

RECORD DRAWING

BLUE SHED

First Floor

General Arrangement

Rev	04/08/15	VR	04/10/15	04/11/15	04/12/15
By	R/BS/1/A/001				
Chk	B				
Scale	1:100				

This drawing is the property of LCA, its part of the drawing may be used for the purpose of the project only. All other drawings and documents, including this drawing, shall be the property of LCA.

Printed on 11/11/16 at 11:11 AM

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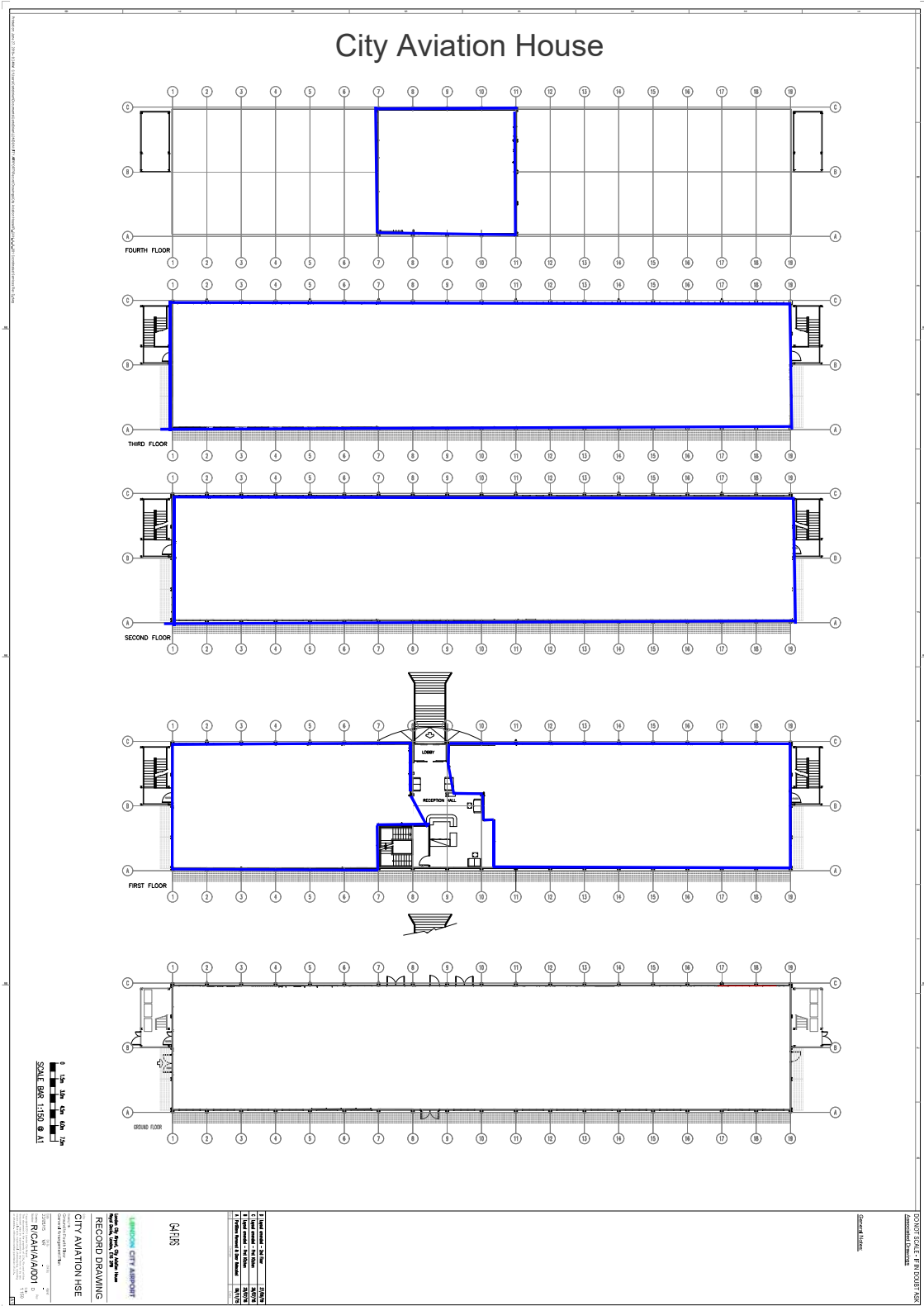
Printed on 11/11/16 at 11:11 AM





City Aviation House

Plan 



## **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

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



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 PROTEST 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 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 PROTEST 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 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 PROTEST 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 ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

AW27

This is the exhibit marked “AW27” in the witness statement of Alexander James Wright.

**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**



**- v -**

**KB-2024-002132**

- (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**

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### **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 be 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](mailto: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](mailto:StuartWortley@eversheds-sutherland.com)  
07712 881 393

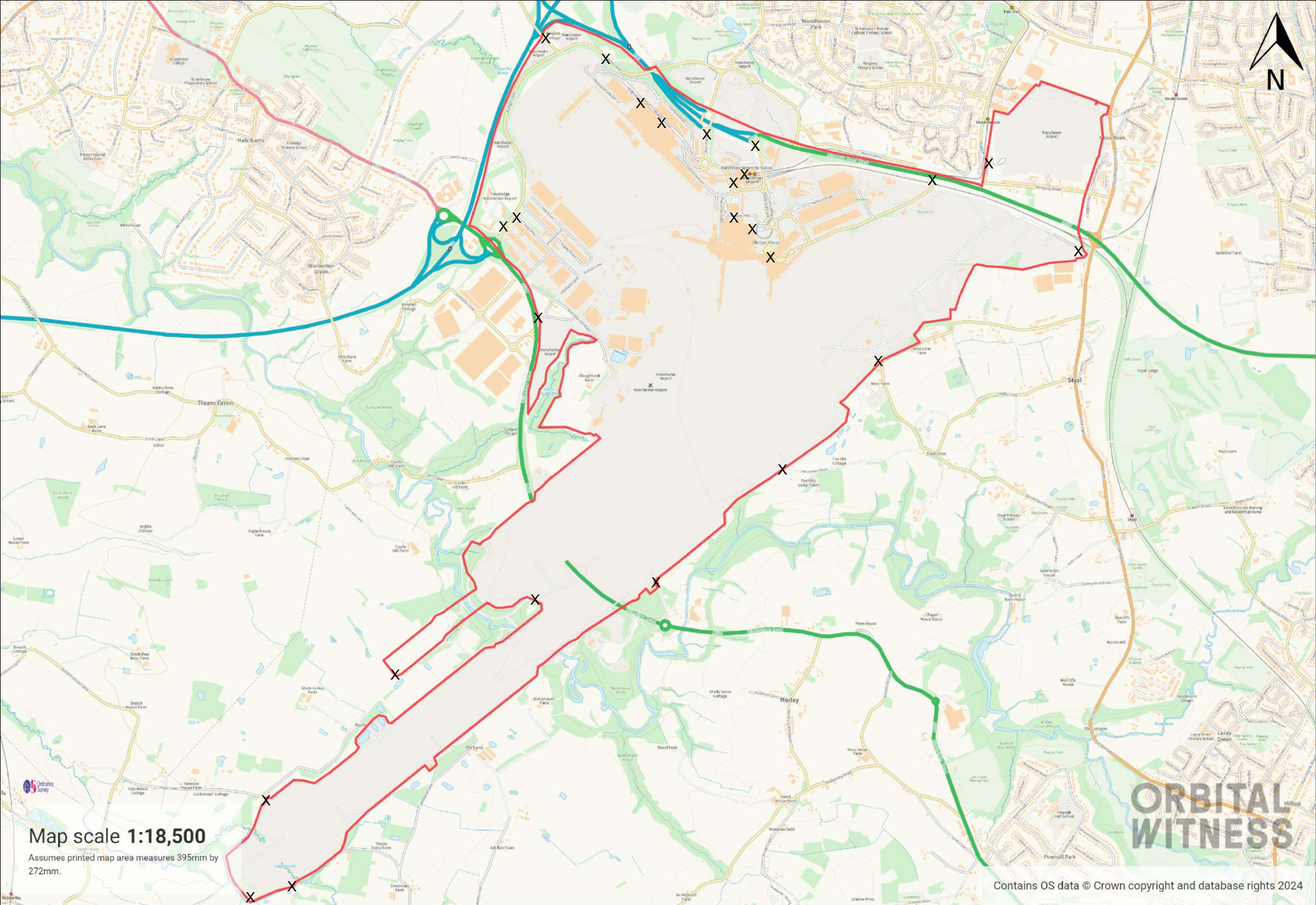
(2) Nawaaz Allybokus  
Eversheds Sutherland (International) LLP  
[NawaazAllybokus@eversheds-sutherland.com](mailto:NawaazAllybokus@eversheds-sutherland.com)  
07920 590 944

(3) Alexander Wright  
Eversheds Sutherland (International) LLP  
[alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)  
07500 578620



## **SCHEDULE 1**







## **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](mailto: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.

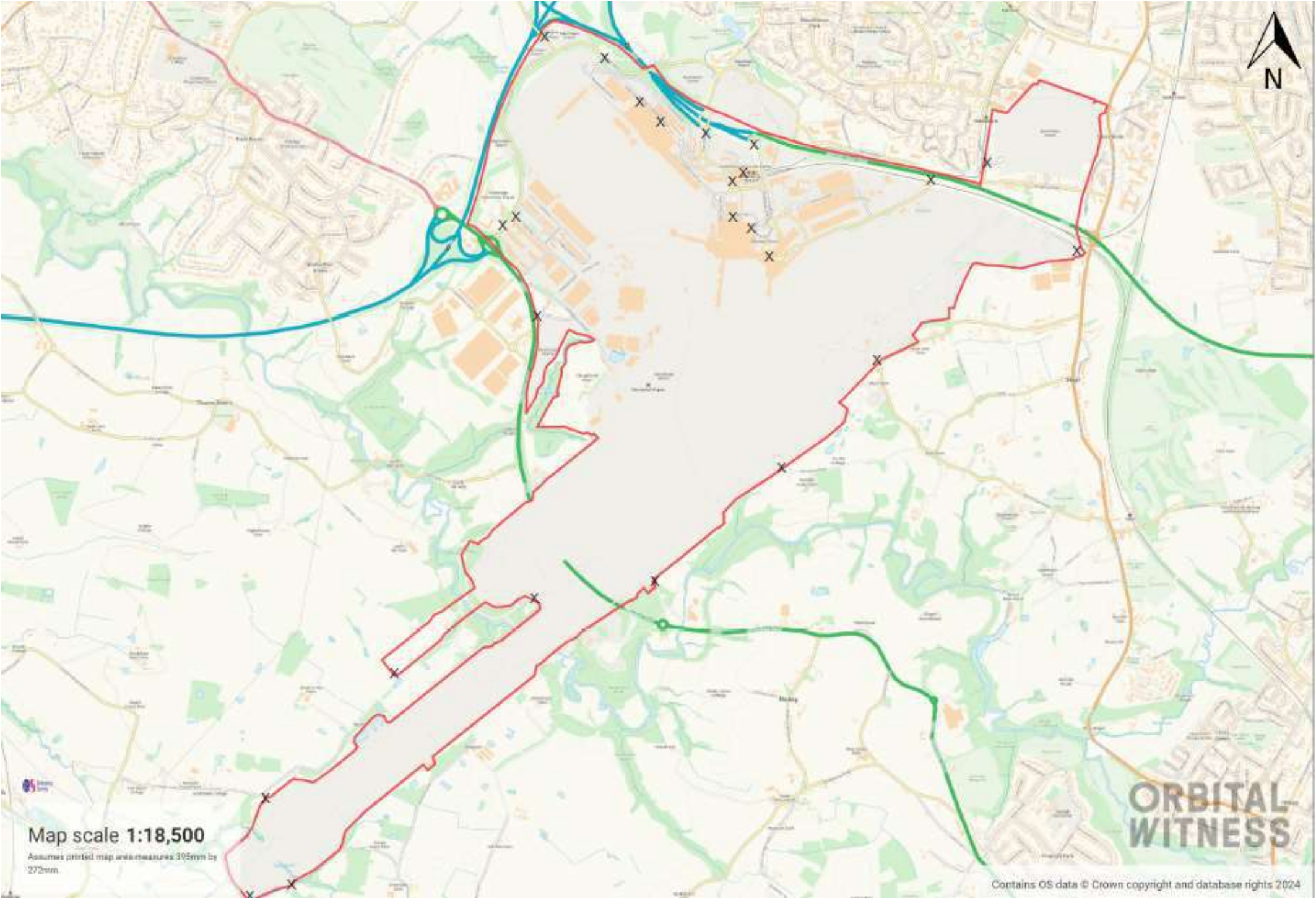
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

**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](mailto:StuartWortley@eversheds-sutherland.com)



**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**



**- v -**

**KB-2024-002132**

- (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

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### 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 be 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](mailto: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**

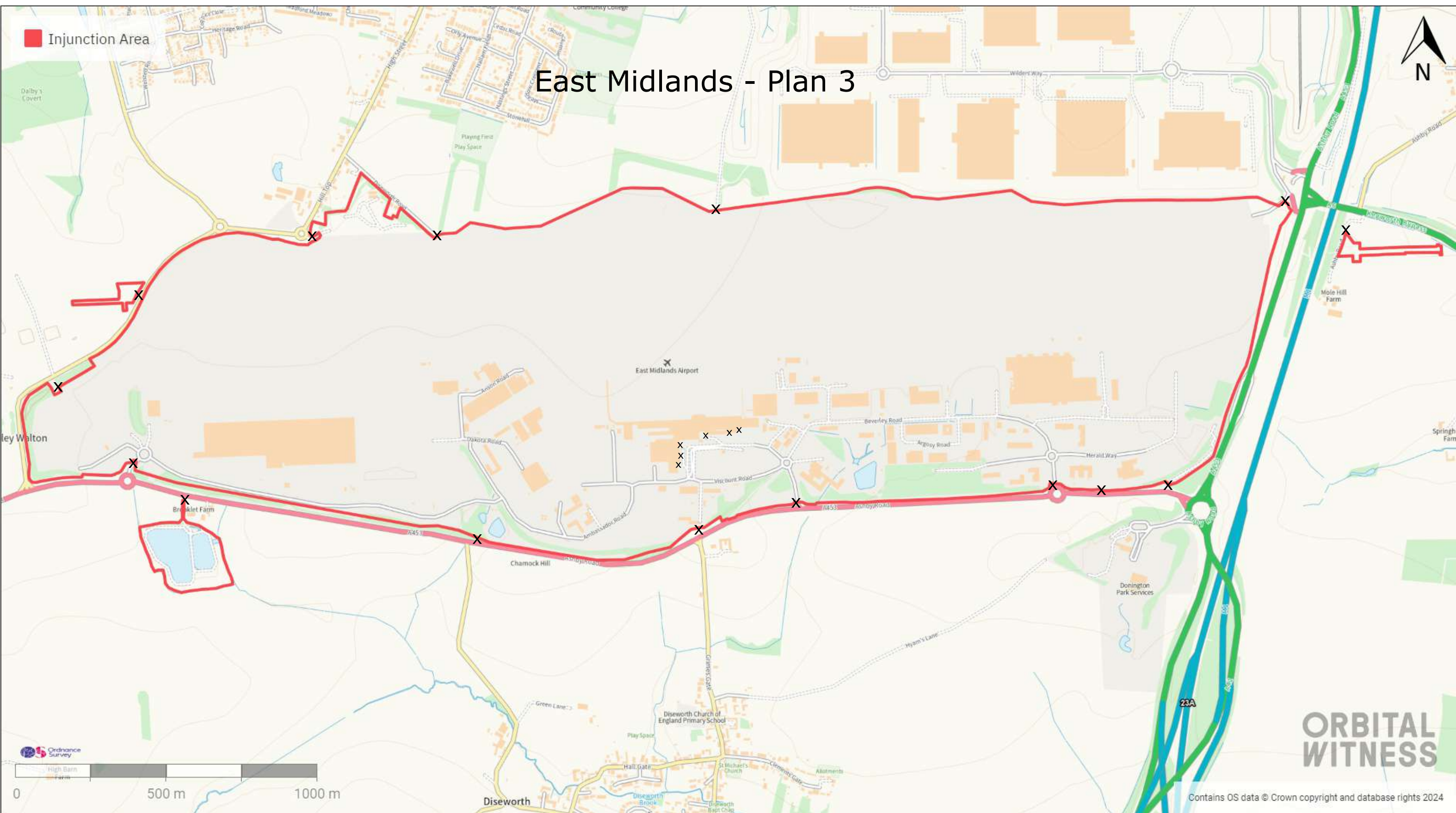
16. The Fifth Claimant's solicitors and their contact details are:

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

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

(3) Alexander Wright  
Eversheds Sutherland (International) LLP  
[alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)  
07500 578620

**SCHEDULE 1**





## **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](mailto: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 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](mailto:stuartwortley@eversheds-sutherland.com).



**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**



**- v -**

**KB-2024-002132**

- (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**

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## ORDER

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### 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 be 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](mailto: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:

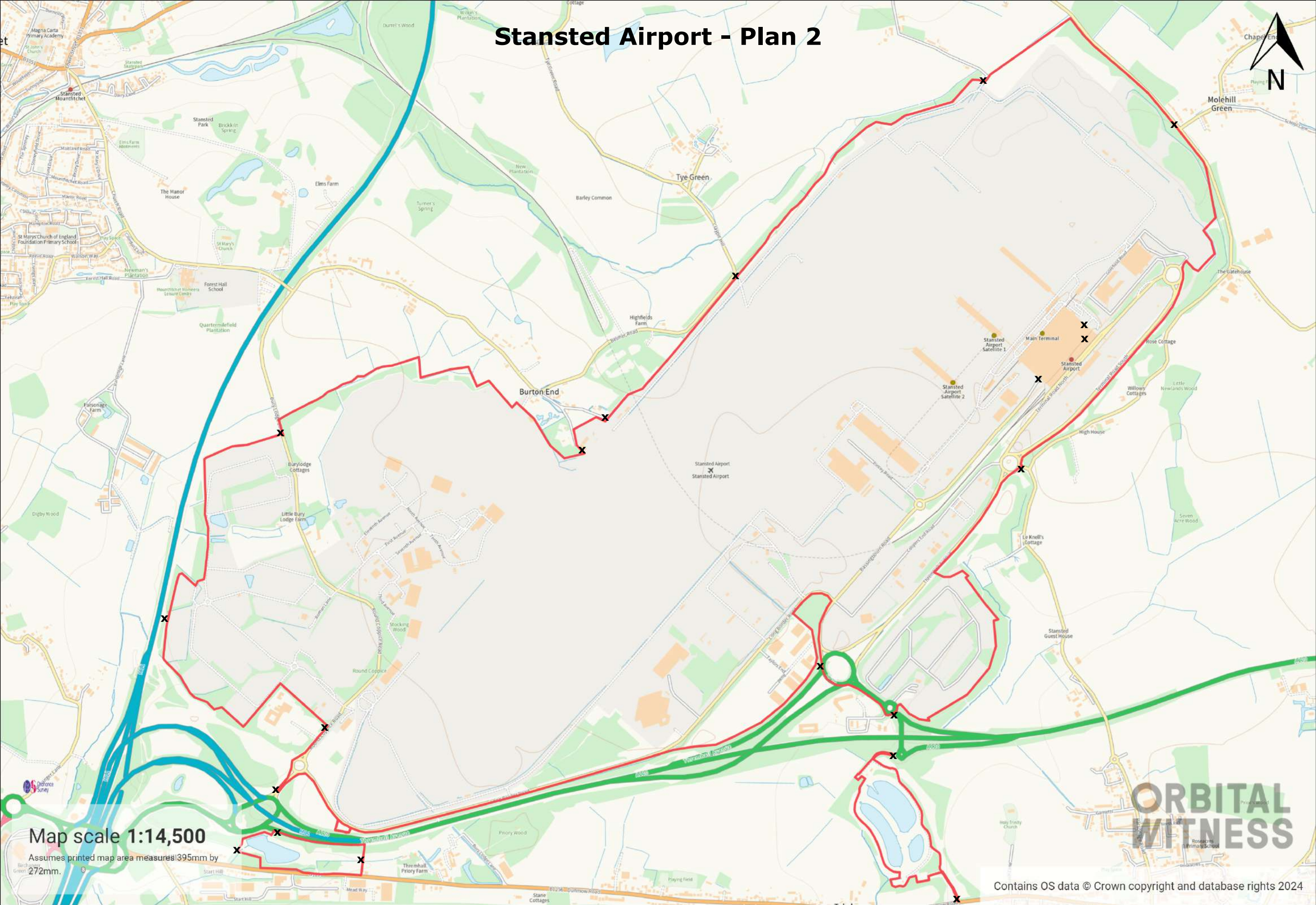
(1) Stuart Wortley  
Eversheds Sutherland (International) LLP  
[StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@eversheds-sutherland.com)  
07712 881 393

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

(3) Alexander Wright  
Eversheds Sutherland (International) LLP  
[alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)  
07500 578620

**SCHEDULE 1**







## **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](mailto: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:

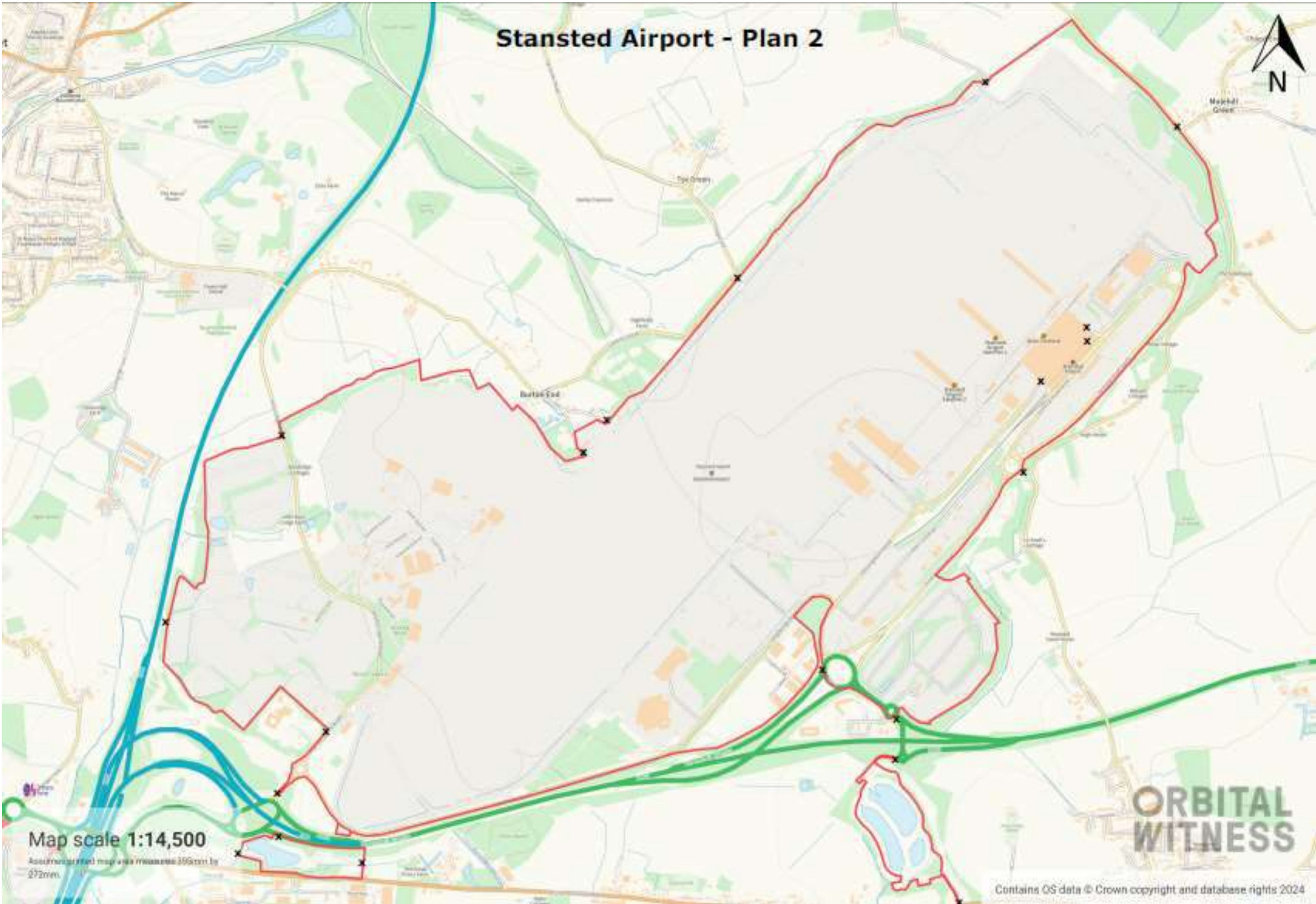
1. Entering, occupying or remaining upon any part of the Airport without the consent of the Fourth Claimant
2. Affixing themselves to any other person or object on the Airport.
3. Impeding access to or enjoyment of the Airport by the Fourth Claimant or those authorised by the Fourth Claimant, whether 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](mailto:stuartwortley@eversheds-sutherland.com).



**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**

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**NOTE OF "WITHOUT NOTICE" HEARING BEFORE  
HER HONOUR JUDGE COE K.C.  
5 JULY 2024**

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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 take 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.

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 PROTEST 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 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 PROTEST 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 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 PROTEST 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 ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

AW28

This is the exhibit marked “AW28” in the witness statement of Alexander James Wright.

**IN THE HIGH COURT OF JUSTICE**  
**KINGS BENCH DIVISION**

**Claim No: KB-2024-002210**

**Before The Honourable Mr Justice Julian Knowles**

**BETWEEN:**

**HEATHROW AIRPORT LIMITED**

**-and-**

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR  
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN  
(WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW  
AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE  
PARTICULARS OF CLAIM**



**Defendants**

**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 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 Claimant having issued this Claim by a Claim Form dated 7 July 2024

**AND UPON** hearing the Claimant's application for an interim injunction by Application Notice dated 7 July 2024

**AND UPON READING** the Witness Statements of Akhil Markanday dated 6 July 2024 and Jonathan Daniel Coen dated 7 July 2024

**AND UPON HEARING** Leading Counsel and Junior Counsel for the Claimant

**AND UPON** the Claimant giving and the Court accepting the undertakings set out in Schedule 1 to this Order

**IT IS ORDERED THAT:**

**INJUNCTION**

1. Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 ("Plan A").
2. In respect of paragraph 1, the Defendants must not (a) do it himself/herself/themselves 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 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 1 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.

**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 Claimant's 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 Claimant's 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 Claimant has 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 a Note of the Hearing on 9 July 2024 will be notified to the Defendants by the Claimant carrying out each of the following steps:
  - 8.1 Uploading a copy on to the following website: [www.heathrow.com/injunction](http://www.heathrow.com/injunction)
  - 8.2 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.
  - 8.3 Either affixing a notice at the locations shown marked with a red dot on the second plan attached to this Order at Schedule 4 ("Plan B") 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 9.4 below.



9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to the Defendants by the Claimant carrying out each of the following steps:
  - 9.1 Uploading a copy of the Order on to the following website:  
[www.heathrow.com/injunction](http://www.heathrow.com/injunction)
  - 9.2 Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
  - 9.3 Affixing a copy of the Order in A4 size in a clear plastic envelope at each of the locations shown with a red dot on Plan B.
  - 9.4 Affixing warning notices of A2 size at those locations marked with a red dot on Plan B, substantially in the form of the notice at Schedule 5.
10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to the Defendants of any further applications shall be effected by the Claimant carrying out each of the following steps:
  - 10.1 Uploading a copy of the application on to the following website:  
[www.heathrow.com/injunction](http://www.heathrow.com/injunction)
  - 10.2 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.
  - 10.3 Affixing a notice at these locations marked with a red dot on Plan B 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 the Defendants may be effected by carrying out the steps set out in paragraphs 10.1 and 10.2 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 the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8.3, 9.3 and 10.3, effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

#### **FURTHER DIRECTIONS**

14. Liberty to apply.

#### **COSTS**

15. Costs reserved.

#### **COMMUNICATIONS WITH THE CLAIMANT**

16. The Claimant's solicitors and their contact details are:

- (1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,  
London EC4R 0BR [akhil.markanday@bclplaw.com](mailto:akhil.markanday@bclplaw.com) / +44 20 3400 4344

- (2) Phil Spencer

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,  
London EC4R 0BR [phil.spencer@bclplaw.com](mailto:phil.spencer@bclplaw.com) / +44 20 3400 3119

**Dated: 9 July 2024**

### **SCHEDULE 1 – UNDERTAKINGS**

1. The Claimant will take steps to notify Defendants of the Claim Form, Application Notice, evidence in support, the Order and a Note of the Hearing on 9 July 2024 as soon as practicable and no later than 5pm on 15 July 2024.
2. The 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 future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

## **SCHEDULE 2 – PLAN A**



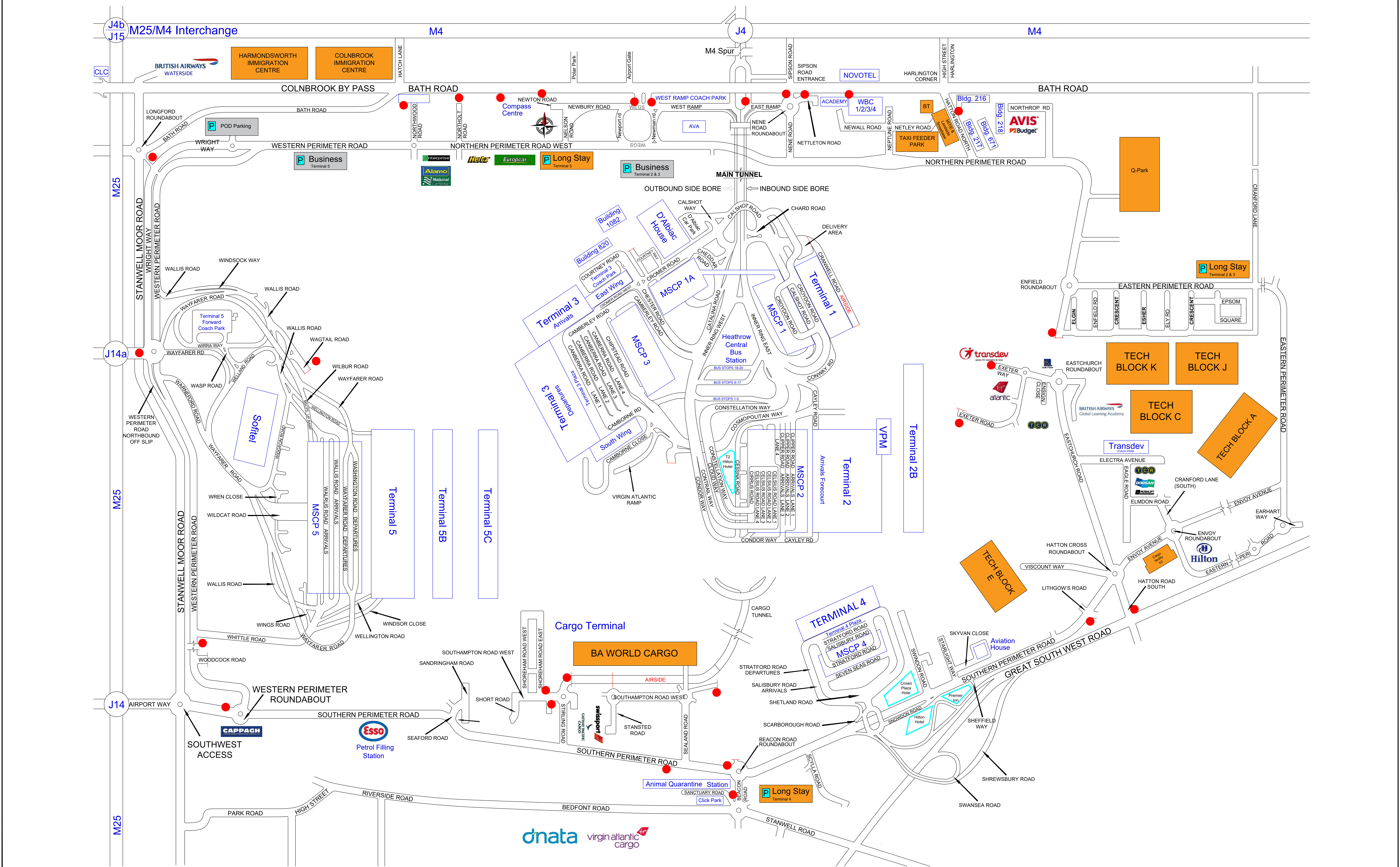
### **SCHEDULE 3 – EMAIL ADDRESSES**

1. [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
2. [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
3. [info@juststopoil.org](mailto:info@juststopoil.org)



## **SCHEDULE 4 – PLAN B**





This drawing may contain Ordnance Mastermap and Master data.

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HEATHROW MASTER DRAWING

This master drawing is maintained to reflect the current installation at all times. Please notify errors or omissions to the Heathrow Airport LTD Asset Information Team. e-mail: [Assetinformation@heathrow.com](mailto:Assetinformation@heathrow.com)

Model / Content References List - Name, Version & Status

This area is for Drawing Originator's Company Logo and Company Details appropriate for the BAA Project.

CAD User to insert the block within this space.

Key Plan

Ver	Date	Description Of Change	En	Title
1.0	07/04	RELEASED FOR INFORMATION	HAL	HEATHROW PUBLIC LANDSIDE ROADS SCHEMATIC

● Approx. Location of Spot Area signage

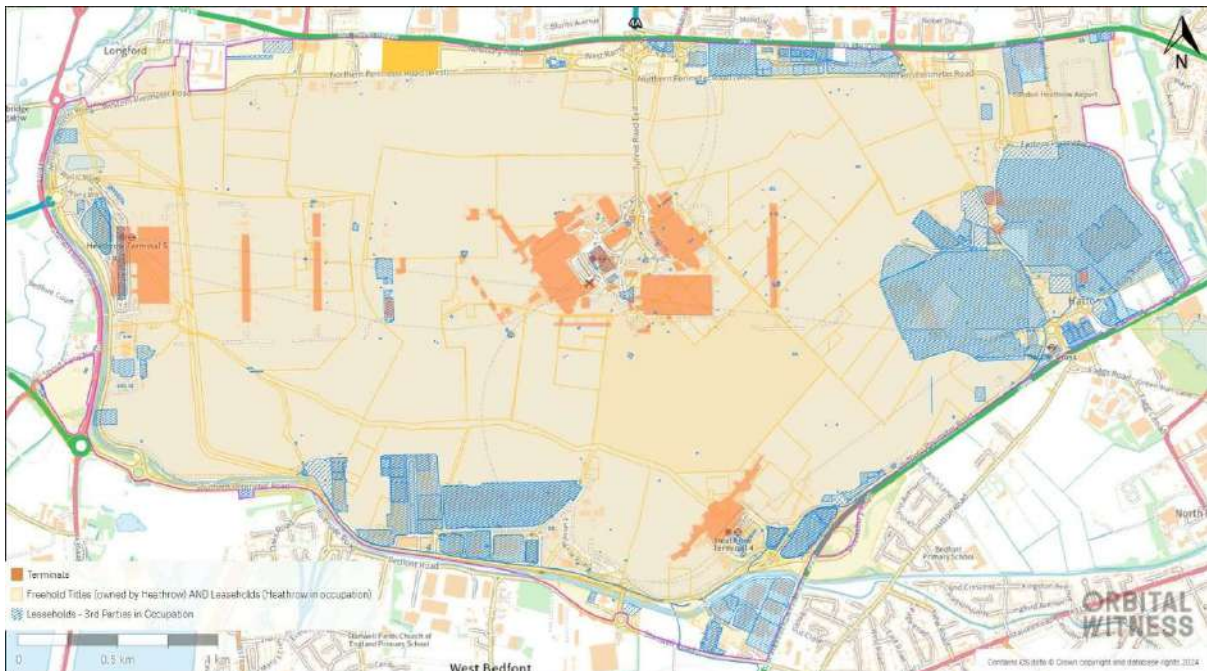
Project Name	Heathrow Project No.	Contract No.
Programme Name	Originator Project No.	Contract No.
Company	Drawn By	Drawn Date
HEATHROW	ATIC	05/07/24
Location Level Sub Series/Project Identifier	Version	
10000-XX-M2-900-000002	1.0	



**SCHEDULE 5 – NOTICE**  
**WARNING – NOTICE OF COURT INJUNCTION**

**A HIGH COURT INJUNCTION granted in Claim No KB-2024-002210 granted on 9 July 2024 until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, now exists in relation to Heathrow Airport. The injunction means you may NOT without the express consent of HEATHROW AIRPORT LIMITED:**

**IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN ENTER, OCCUPY OR REMAIN UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE PLAN BELOW:**



**ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED, OR HAVE THEIR ASSETS SEIZED.**

A copy of the legal proceedings (including the Order, Claim Form, Application Notice, evidence in support and a note of the hearing on 9 July 2024) can be viewed at [www.heathrow.com/injunction](http://www.heathrow.com/injunction) or obtained from:

- (1) Compass Centre, Heathrow Airport, Nelson Road, Hounslow TW6 2GW, which is open between 9am-5pm Monday-Friday; or
- (2) Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR (Reference: AMRK/PSPE/20H0904.000140; Telephone: 020 3400 3119).

Anyone notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. The address of the Court is the Royal Courts of Justice, Strand, London WC2A 2LL.

**IN THE HIGH COURT OF JUSTICE**  
**KINGS BENCH DIVISION**

**Claim No. KB-2024-002210**

**B E T W E E N:**

**HEATHROW AIRPORT LIMITED**

**Claimant**

**-and-**

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR  
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN  
(WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW  
AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE  
PARTICULARS OF CLAIM**

**Defendants**

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**NOTE OF "WITHOUT NOTICE" HEARING BEFORE  
MR JUSTICE JULIAN KNOWLES  
LISTED FOR 9 JULY 2024 AT 14:00**

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The hearing was originally listed before Mrs Justice Cutts at 10:30am on 9 July 2024. The Hearing Bundle refers to that original listing on its face.

The hearing commenced at 13:58. Appearing for the Claimant, Katharine Holland KC ("KH") and Jacqueline Lean ("JL") before Mr Justice Julian Knowles ("J").

1. KH expressed appreciation for the listing of the urgent hearing and Knowles J making the time in his listings.
2. J confirmed he had electronic papers sent last night and had read the Skeleton Argument and witness evidence and reviewed some plans. He is relatively familiar with the case law, generally from the press, and from similar cases covered recently.

3. KH proposed to take J through the Skeleton Argument in order and, mindful of the without notice nature of the application and duty of full and frank disclosure to cover everything but will note any areas if J wishes to move on.
4. J confirmed no need to go laboriously through underlying risk and threat evidence, he has seen some similar evidence before and has a general awareness. Obviously, the Claimant must demonstrate their entitlement to an order though.

### **Opening**

5. KH outlined Heathrow is Europe's busiest airport and a piece of Critical National Infrastructure. In relation to Just Stop Oil ('JSO'), there is a specific threat to Heathrow that may not have applied or been so obvious at London City ('LCY') where J had previously granted an injunction, namely the JSO video specifically identified Heathrow. J indicated it was not necessary for Counsel to review the JSO background and threatened deadline to MPs, etc. in detail.
6. KH clarified the Claimant is adopting a claim based on the UKSC's decision in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 W.L.R. 45 to be referred to in detail later.
7. KH outlined how big Heathrow is and summarised the title, reference to Skeleton Argument para 3. KH clarified the perimeter and parcels within, exhibited at Hearing Bundle ('HB') page 15. Titles within Claimant ownership and the perimeter plan (HB24).
8. J remarked it is a much bigger site so he wished to orient himself. The left most purple line and orange building is Terminal 5. North is the A4.
9. KH clarified that blue hatched areas are leased to other non-parties. The terminals are coloured orange and on numerous floors have various third party occupants. J asked for an example and KH hypothesised Boots. J gave examples of Border Force and police leases.

10. KH clarified the classic cause of action in trespass over land where the Claimant has an immediate right to possession (shaded yellow on the plan) is a textbook example. But the Court will be addressed on how the perimeter as defined, regardless of third party interests within, gives the Claimant sufficient right in case law to claim over the whole area edged purple, including (as J queried, having looked at it in the *HS2* case) via *Manchester Airport Plc v Dutton & ors* [2000] 1 Q.B.133.
11. J queried, in short, whether the point was that the title was better than that of any trespasser. KH said that was exactly so and indicated there were other principles to similar effect.
12. KH directed J to HB339 where there is a larger plan. KH clarified as per the witness evidence some OCEs were still on order from HM Land Registry but, on the evidence as a whole in this case, the ownership is clear.

#### **Right to Possession**

13. KH explained that the backdrop is the Claimant's 'better right' to control based on 3 documents – as operator (Certificate of operation), with the benefit of the economic licence granted under Civil Aviation Act 2012 and also by virtue of the Byelaws made pursuant to s.63 or s.64 of the Airports Act 1986.
14. J confirmed he did not need to review the principle of Byelaws in detail, being familiar from the LCY claim.
15. KH explained that the backdrop is control and how the Claimant exercises it as a totality over the whole area.

#### **Apprehended Action**

16. For the Court's note, the witness evidence is p298-302 (Akhil Markanday) and p47-48 (Jonathan Daniel Coen). Skeleton Argument paragraph 13. Skeleton Argument paragraph 15 relates to the campaign targeting airports and paragraph 16 historical events.



17. J was familiar with an event at LCY where someone glued themselves to a plane. J was also familiar with the self-evident hazards in and around airport restricted areas.

### **Causes of Action**

18. KH explained that trespass is extremely clear cut (*Secretary of State for the Environment, Food and Rural Affairs v Meier* [2009] 1 WLR 2780). KH took J to Skeleton Argument paragraph 23 and the *Dutton* case, quoting the headnote on page 146 of authorities bundle and the Court of Appeal's conclusion. J was taken to the *Twickenham* case cited in *Dutton* in the same Skeleton Argument paragraph.
19. KH explained that the Claimant seeks an order necessary to vindicate and give effect to the rights it necessarily enjoys (via the certificate, licence and Byelaws). The second sentence of *Twickenham* (*Dutton* page 144, c to d) is relevant to statute giving us a degree of control, see Laws LJ. Finally, p151 at letter d is relevant.
20. KH explained that all of these principles were said by the Claimant to flow from *Dutton*. In *High Speed Two (HS2) Limited v Four Categories of Persons Unknown* [2022] EWHC 2360 (KB) at Skeleton Argument paragraph 23.2, this is J's own judgment and paragraph [77] is relevant. We also cite *Mayor of London v Hall* [2011] 1 WLR 504 at [22]-[27] given our title complexity. J was directed to read [27] in particular. KH also directed J to [53], albeit it was not in highlighted in the Skeleton Argument.
21. KH took J to the Skeleton Argument paragraph 25, and explained that the Claimant said that the certificate, aerodrome manual, licence and Byelaws make good the case for the Claimant's necessary control.
22. J asked about Skeleton Argument paragraph 23 and the certificate. KH clarified this is an operational conferment, pursuant to which there is the aerodrome manual and referred specifically to HB94 and HB101. KH referred to Skeleton Argument 25.1.2.
23. KH then referred J to the economic licence which confers a right to charge – also denoting a level of control. Then the Byelaws (HB256) confer ability to regulate use/operation/conduct of persons.

24. KH explained that, in a nutshell, this is a ‘do not go on to the airport in connection with this’ approach. A very simple one. Defendants are defined as persons entering in connection with the campaign. Fact of entry is simple and correct way of defining in relation to those activities. The general position in relation to the airport is that there is a certain permission to go on and use, but going on in connection with a campaign is not what one would expect in that general scenario.
25. J picked a Byelaw example – not to display signs. Presumably an activity with placards would be an automatic violation?
26. KH agreed, and drew attention to the two Byelaws which were the easiest ones to indicate the Claimant’s approach was correct, being byelaws 3.19 and 3.21 (HB270). Those referred to the very activities the definition of Defendant addressed. KH directed J to Skeleton Argument paragraph 27.
27. J noted a point he had raised in the LCY hearing that he had noticed e.g. railways now have signs about implied consent to enter being withdrawn e.g. for antisocial behaviour. Any implied consent to go on and use the airport being withdrawn for the people described as D.
28. KH submitted that the Claimant’s case was that trespass is sufficient for the entirety of the relief sought but the Claimant had also pleaded private and public nuisance at Skeleton Argument paragraphs 29-31.
29. J indicated he was familiar with those causes of action from *HS2*.

### **Principles for Relief**

30. KH referred to a number of cases, including *Valero Energy Ltd & ors v Persons Unknown* [2024] EWHC 134 (KB). There was discussion in relation to the nature of the injunction being sought (interlocutory vs. final injunctions) since *Wolverhampton* and in the context of LCY. J wondered whether in this sort of case with unknown Ds, the difference between final injunction after review and interlocutory is a distinction without a difference.

31. KH suggested that approach was vindicated by *Wolverhampton* at para 143(vii), which supports the LCY approach of no return date but review. KH offered that a return date could be included on an Order (if made) if the Court considered that appropriate.
32. KH drew attention to the Skeleton Argument for the case law and tests. KH submitted that the principles applied, the Claimant had a clear cause of action (trespass + nuisance) and realistic prospect of success. There was a serious issue to be tried. Footnote 3 of the Skeleton Argument deals with the s.12(3) of the Human Rights Act 1998. Even if there is a higher test of 'likely to be granted' that was satisfied in any event. Damages are clearly not adequate as a remedy. There is a real and imminent threat.
33. KH informed J that in addition to LCY, the Claimant was also aware of a recent Order by HHJ Coe KC in respect of Manchester/Stansted/East Midlands Airports on 5 July. The papers only seemed to be published that morning, so there had not been a chance to read all the papers in full, but as part of the duty of full and frank disclosure, KH highlighted some differences.
34. J asked if the injunctions had been granted for similar reasons, i.e. the campaign of action proposed for the summer.
35. KH confirmed that was her understanding. [A printed bundle of papers relating to those injunctions was handed up]. KH drew attention to (1) the different way in which the Defendants were defined, and explained why the Claimant had adopted the approach it had (avoiding subjective purposes / state of mind); (2) the inclusion of Extinction Rebellion within the definition of the Defendants, noting that this was covered off in the Claimant's definition which referred to 'other environmental campaign' and (3) that the Claimant's proposed description did not refer to protest (which was referred to in the description of the Ds in those Orders) and why that was. J noted that this was private land, and there was not a right to protest on private land, referencing *HS2* and the Strasbourg Court in *Appleby v United Kingdom* [2003] 27 EHRR 38.
36. KH then drew attention to paragraph 3 of the Manchester/Stansted/East Midlands Order which was very prescriptive, and explained why the Claimant did not consider that was needed in this case, and also highlighted that the claimants in that case had applied for alternative service rather than to dispense with service, which would be addressed later.

37. J noted that Orders in such cases will each turn on its own facts, and that he wasn't sure how helpful it would be to go through those papers further, noting that the Claimant would be reflecting on those cases and would no doubt bring anything to the Court's attention pursuant to the duty of full and frank disclosure, in the event that the Order was made, and the Claimant needed to come back, rather than trying to deal with it 'on the fly'.
38. KH finished on that point but highlighting the key point was in that case there had been some points about highways which was not the case here.
39. KH then directed J to Skeleton Argument paragraph 14, and submitted that the evidence makes out a compelling need for the Order. The act the Claimant seeks to prohibit is directly related to the tort, clear and precise, all the tests are met. It's a very simple injunction with no difficulty for people to understand. There are clear geographical (the perimeter) and temporal limits.
40. J asked the time period being sought, and noted that 5 years with annual review had been granted on the LCY injunction.
41. KH confirmed the Claimant also asked for 5 years with annual review.
42. J said that absent any evidence these protests will go away, and quite the reverse whatever the rights or wrongs of that, he did not think 5 years was unreasonable.
43. KH then turned to the final tests. KH submitted that this is private land regarding the Human Rights Articles as already indicated; the Claimant was not a public authority and even if it was, the balancing act from all recent cases very clearly comes out for the Claimant, addressing those points pursuant to the duty of full and frank disclosure.
44. J noted that nothing in the Order stops protests on public land (subject to blocking traffic, etc.) but they just cannot be on private land. KH commented that it would only be in an extreme case where the essence of the right of free speech or assembly was barred or effectively destroyed that the Articles could be a defence if it was private land.

45. KH then addressed service, highlighting that the Claimant's approach was similar to LCY based on *Wolverhampton* at paragraph 56. The Claimant proposed to dispense with service and to notify persons potentially affected by the Order. KH directed J to where this was dealt with in the Claimant's witness evidence too (specifically, paragraph 56, HB311). The Claimant had to satisfy J of this being effective. The Claimant considered the arguments did so. The backdrop is at [230]-[231] of *Wolverhampton*.

46. J asked if there were any identified individuals.

47. KH confirmed that there were not, and directed J to the evidence in relation to that at HB310, paragraphs 51-53. Enquiries continued. The Claimant was aware of its obligations.

### **Full and Frank Disclosure**

48. KH ran through the points set out in the Skeleton Argument.

49. J noted that some of these points have been run elsewhere without success, including in *HS2*— a good evidential base and fear, doesn't mean you have to wait for action to start.

### **The Order**

50. KH and J then reviewed the Order, with particular reference to:

- a. Date. Until...9 July 2029 but (3) should say 'reviewed annually on each anniversary';
- b. Proposals for notification of the Order, by particular reference to Plan B at Schedule 4. J queried whether this included any locations at tube stations, as it seemed to him that some people wanting to go to the airport to protest would go by tube. KH explained why notices at the red dots were proposed and confirmed that notices could be put (voluntarily) where people at access from public transport. JL explained that notices would need to be within the Claimant's land. It was not practically possible to show locations on the Plan. J noted that

provided the Claimant put the documents at least at the red dot locations, there was nothing to stop the Claimant putting notice elsewhere;

- c. The Warning Notice at Schedule 5;
- d. The Undertakings in Schedule 1 which should include an undertaking to notify the Defendant by a specified date. LCY Order provided for 4 days. KH offered to do the same.

51. KH highlighted a small point re Plan A, in that it appeared some land within the boundary was not shaded yellow when it probably should be. But we say this does not make a difference to the area of control, i.e. the purple line.

52. J said he would grant the order subject to amendments discussed for reasons set out in Skeleton Argument.

Hearing ended 15:20.



Party: Claimants  
Name: Alexander James Wright  
Number: Second  
Date: 17.07.2024

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

- v -

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST 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 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 PROTEST 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 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 PROTEST 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 ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

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SECOND WITNESS STATEMENT OF  
ALEXANDER JAMES WRIGHT

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I ALEXANDER JAMES WRIGHT of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a Principal Associate in the firm of Eversheds Sutherland (International) LLP and assisting Stuart Wortley (Partner) who has conduct of these proceedings on behalf of the Claimants.
2. I make this witness statement in support of the Claimants' application for an injunction. I make it further to my first witness statement of 16 July 2024.
3. This witness statement has been produced by me with the assistance of my colleagues Nawaaz Allybokus and Emma Payne.
4. The statements in this witness statement are from my own knowledge, save where I state otherwise. Where statements are matters of information or belief, I provide the source of that information or belief.

#### **OTHER AIRPORT PROTESTS**

5. At paragraphs 67-76 of my first witness statement, I referred to protests which had occurred at other airports.
6. I noted the evidence filed in support of the injunctions granted in favour of Manchester Airport, Stansted Airport and East Midlands Airport in the claim under number KB-2024-0002132, which included a protest having occurred at Stansted airport on 20 June 2024.
7. I did not mention in that statement a further incident which was mentioned in the evidence in support of that application, which was an attempted protest at Gatwick airport. The evidence from Mr David McBride, head of legal at Manchester Airports Group stated at paragraph 47:

#### **"25 JUNE 2024 – DIRECT ACTION AT GATWICK AIRPORT**

*47. On 26 June 2024, our security team received a briefing from the National Police Coordination Centre concerning the arrest of four JSO protestors at London Gatwick Airport. These individuals were not intending to travel but were in possession of bags containing several hundred bandages. The police suspect that they intended to distribute the bandages across a runway – forcing the closure of the airport until all of the bandages could be removed (owing to the risk of damage which might occur if any of the bandages was drawn into to an aircraft jet engine)."*

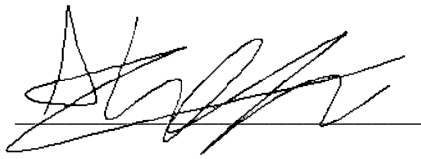
A copy of Mr McBride's witness statement is available online at <https://assets.live.dxp.maginfrastucture.com/f/73114/x/270ba6fa6d/injunction-mag-hearing-bundle.pdf>.

**Statement of truth**

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 the Claimants' behalf.

A handwritten signature in black ink, appearing to be 'AJ Wright', written over a horizontal line.

Alexander James Wright

17 July 2024