IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

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

B E T W E E N

VARIOUS AIRPORTS
AS MORE PARTICULARLY DESCRIBED
IN THE (AMENDED) CLAIM FORMS

Claimants

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE (AMENDED) CLAIM FORMS

Defendant

SUPPLEMENTAL HEARING BUNDLE
JUNE 2025

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Claim no: KB-2024-001765

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) LONDON CITY AIRPORT LIMITED
(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

-and-

PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER DEFINED IN THE CLAIM FORM

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the injunction made by Order dated 20 June 2024 by Mr Justice Julian Knowles ("**the Knowles J Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 ("**the Claims**")

AND UPON reading the application and the witness evidence in support

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Knowles J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Knowles J Order.

2. Paragraph 3 of the Knowles J Order is amended so as to read:

   "The injunction contained at paragraph 1 of this Order shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list). Such hearing shall be listed to be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the review hearing."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

□

Claim no: KB-2024-001765

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) LONDON CITY AIRPORT LIMITED
(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

-and-

PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER DEFINED IN THE CLAIM FORM

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the Claimants' claim by the claim form dated 12 June 2024

AND UPON the Claimants' application for an injunction dated 12 June 2024

AND UPON the injunction made by Order dated 20 June 2024 by Mr Justice Julian Knowles ("**the Knowles J Order**")

AND UPON the Claimants' application dated [2 July?] 2024

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 **("the Claims")**

AND UPON reading the application and the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Knowles J Order

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London City Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the Knowles J Order

DEFINITIONS

"**London City Airport**" means the land shown in red outlined in red on Plan 1 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 1**") 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.

"**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.londoncityairport.com/corporate.corporate-info/reports-and-publications/injunction at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Defendants and each of them are forbidden from entering, occupying or remaining on any part of London City Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Claimants (or either of them).

2. This Order is subject to periodic review by the Court on application by the Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the Defendants by:

    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. 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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Defendants and each of them.

6. The Court will provide sealed copies of this Order to the Claimants' solicitors for service or notification (whose details are set out below).

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the Defendants of any further applications or documents in the proceedings by the Claimants shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE CLAIMANTS

(1) The Claimants will take steps to serve the Defendant with a note of the hearing which took place on [ ] by [ ].

(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 Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

SCHEDULE 4 – WARNING NOTICE

HIGH COURT CLAIM NO: [ ]

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED [ ] ("the Order")

TO: Persons Unknown who, in connection with the Just Stop Oil or other environmental campaign, enter occupy or remain (without the Claimants' consent) upon that area of land known as London City Airport (as shown for identification edged red on the attached Plan 1) but excluding those areas of land as further defined in the Claim Form (the "**Defendants**")

FROM: (1) London City Airport Limited (2) Docklands Aviation Group Limited (the "**Claimants**")

This notice relates to the land known as London City Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport without the consent of the Claimants.

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

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the 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 24 July 2025 may be viewed at: https://www.bristolairport.co.uk/corporate/about-us/our-policies/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.

IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION

CLAIM NO: KB-2024-001765

Before Mr Justice Julian Knowles
On 20 June 2024

BETWEEN:-

(1) LONDON CITY AIRPORT LIMITED
(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants



- v -

PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER DEFINED IN THE CLAIM FORM

KB-2024-001765

Defendant

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimants' claim by Claim Form, dated 12 June 2024

AND UPON hearing the Claimants' application for an interim injunction, dated 12 June 2024, and supporting evidence, without Persons Unknown being notified

AND UPON hearing Counsel for the Claimants

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the "Land" being defined as that land known as London City Airport, as shown for identification edged red on the attached Plan 1 in Schedule 1, but excluding:

a. Those buildings shaded blue on Plan 1;
b. In those buildings shaded green on Plan 1, the areas edged blue on Plans 2-8;
c. In those areas shaded purple, the land suspended over the ground and forming part of the Docklands Light Railway.
d. In the areas shaded pink, the underground rail tunnel, the subway and that part of Docklands Light Railway located below ground level.

IT IS ORDERED THAT:

INJUNCTION

1. Until 20 June 2029 or final determination of the claim or further order in the meantime, whichever shall be the earlier, Persons Unknown must not, without the consent of the Claimants, enter, occupy or remain upon the Land.

2. In respect of paragraph 1, Persons Unknown must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

3. The injunction contained at paragraph 1 of this Order shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1.5 hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the review hearing.

VARIATION

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

6. The Claimants have liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

7. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).

8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and Note of the Hearing on 20 June 2024 will be notified to Persons Unknown by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction

    b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.

    c. Either affixing a notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9(d) below.

9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to Persons Unknown by the Claimants carrying out each of the following steps:

a. Uploading a copy of the Order onto the following website: https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction

b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.

c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 1.

d. Affixing warning notices of A2 size at those locations marked with an "X" on Plan 1.

10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to Persons Unknown of any further applications shall be effected by the Claimants carrying out each of the following steps:

a. Uploading a copy of the application onto the following website: https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction.

b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.

c. Affixing a notice at those locations marked with an "X" on Plan 1 stating that the application has been made and where it can be accessed in hard copy and online.

11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(a)-(b) only.

12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.

13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8(c), 9(c)-(d) and 10(c), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

14. Liberty to apply.

15. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANT

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

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

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

Dated: 20 June 2024

SCHEDULE 1 - PLANS

Plan 1

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

N

Map scale **1:5,650**

Assumes printed map area measures 395mm by 272mm.

ORBITAL WITNESS

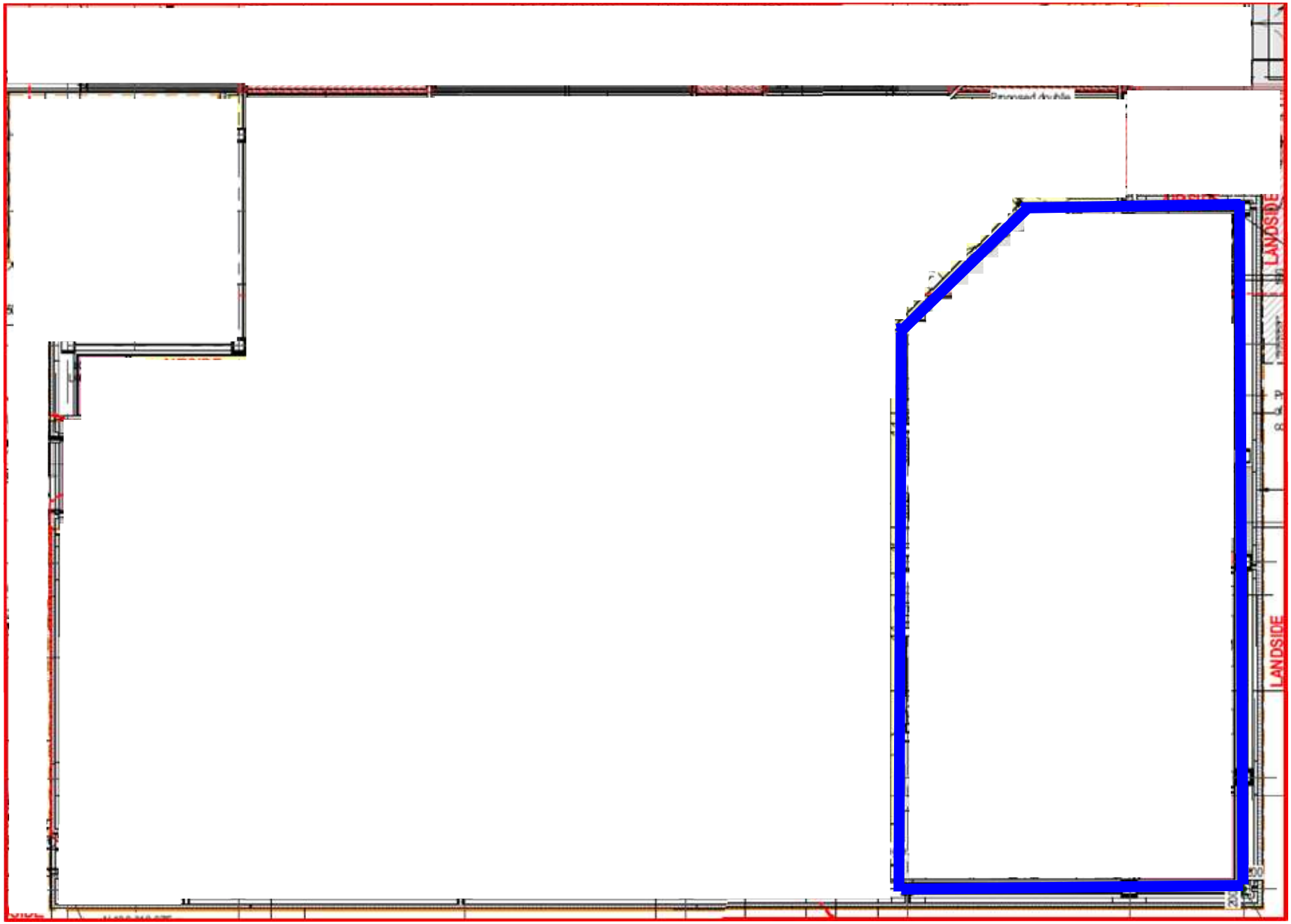
Contains OS data © Crown copyright and database rights 2024

Main Terminal - Ground Floor

Plan 2

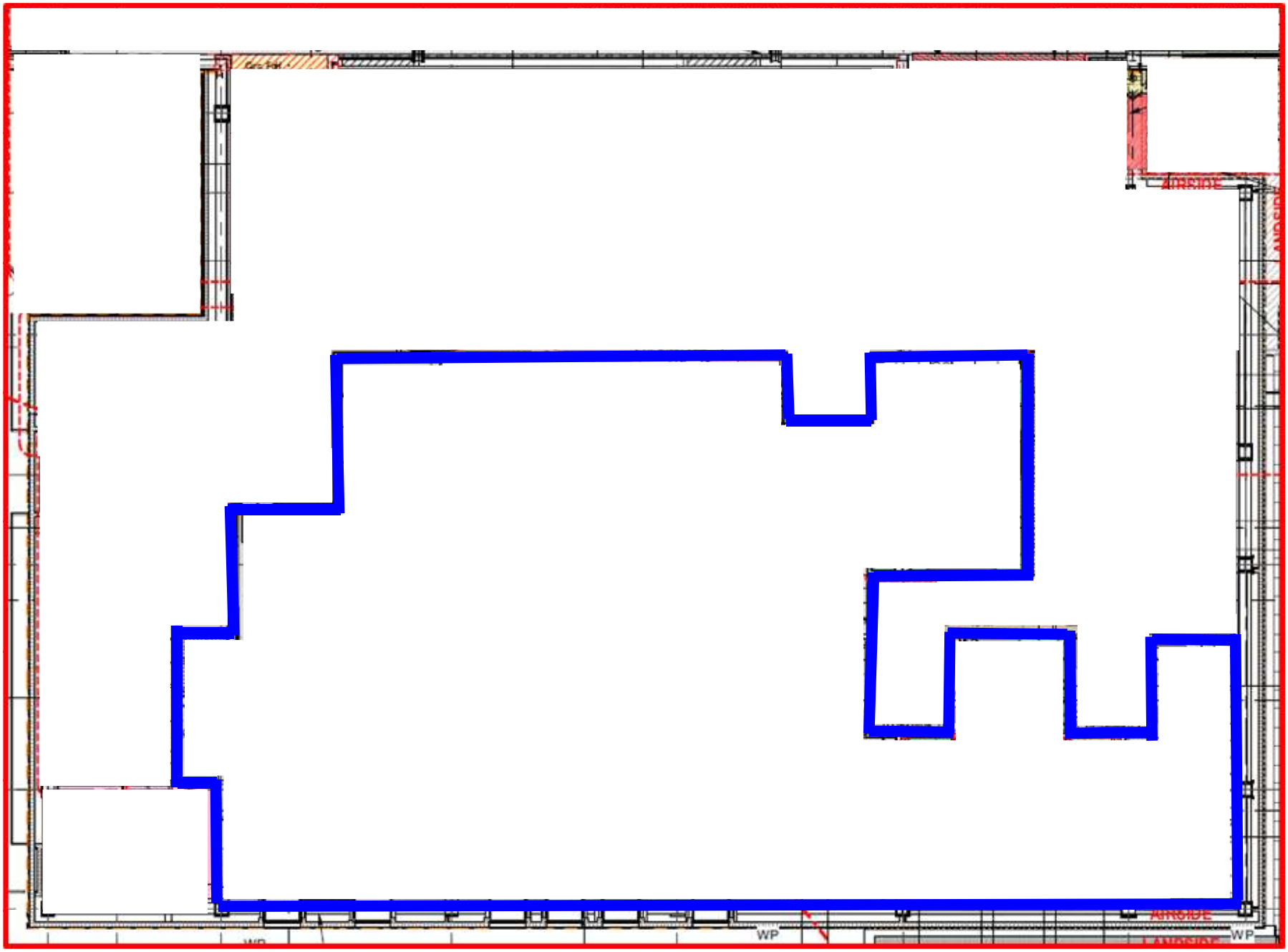


Plan 3

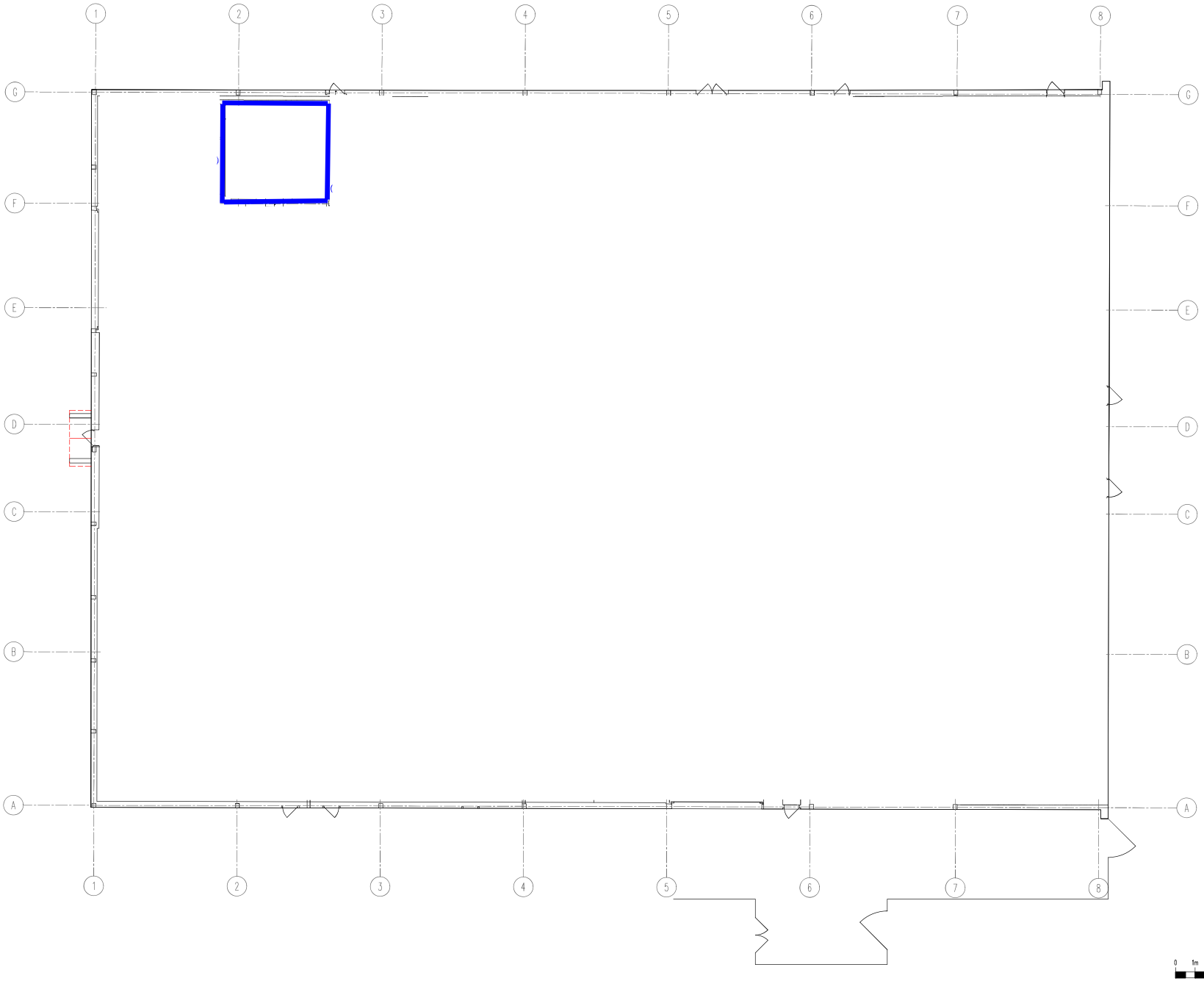


Terminal Immigration Facilities - Floor

Plan 4



Plan 5



0 1m 2m 3m 4m 5m

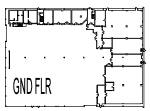
SCALE BAR 1:100 @ A1

DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:

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



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

RECORD DRAWING

Title
BLUE SHED
Drawing Title
Ground Floor
General Arrangement Plan

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

Drawing Number R/BS/G/A/001 Rev B

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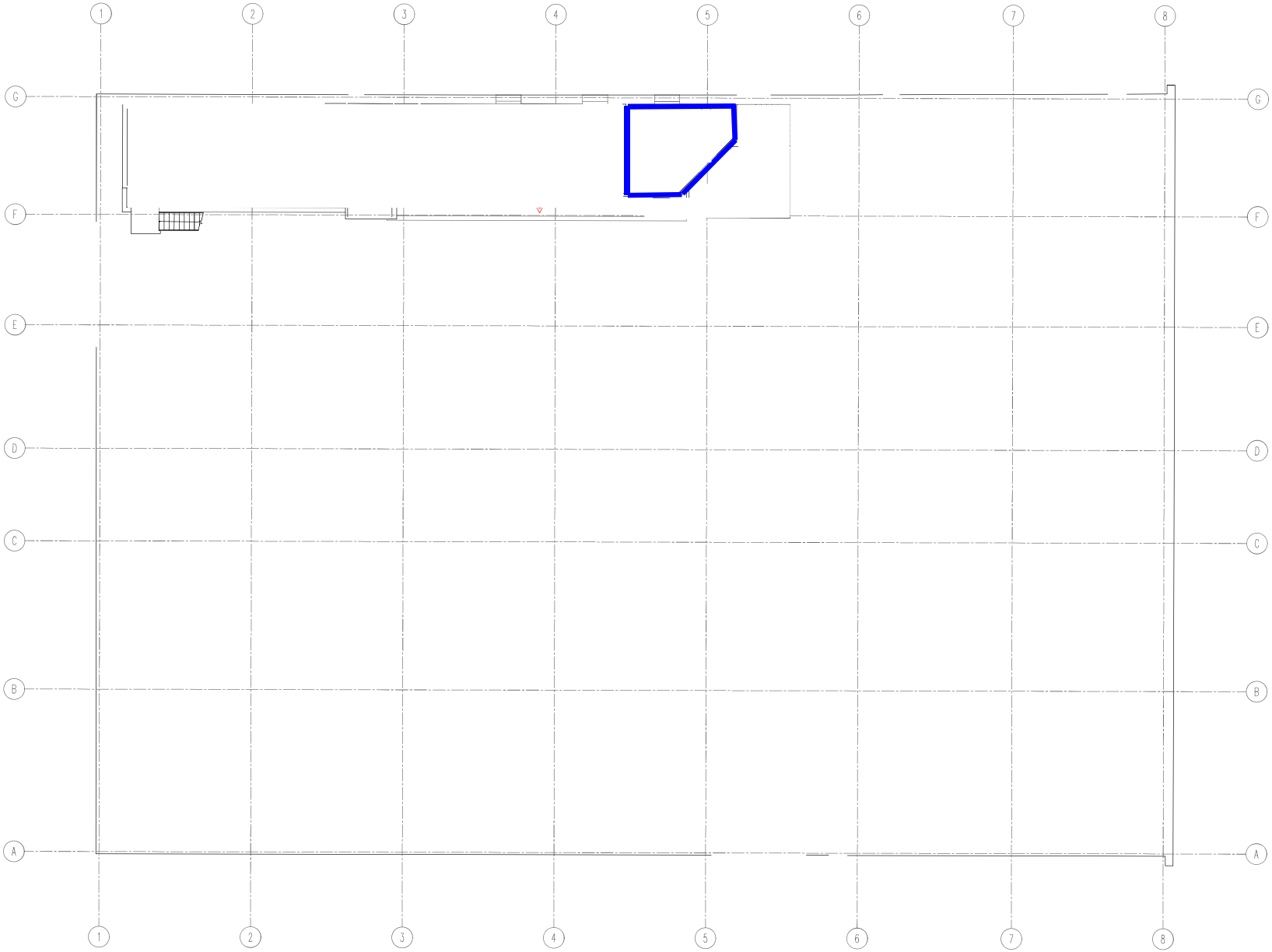
Scale 1:100

A1

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Blue Shed - Floor

Plan 6



DO NOT SCALE - IF IN DOUBT ASK

Associated Drawings

General Notes:

LEGEND

FIRE DOOR

STANDARD DOOR

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

1ST FLR

London City Airport

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

RECORD DRAWING

Title
BLUE SHED

Drawing Title
First Floor
General Arrangement

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

Drawing Number R/BS/1/A/001 Rev B

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Scale 1:100

A1

0 1m 2m 3m 4m 5m

SCALE BAR 1:100 @ A1

Printed on: November 1, 2018 - 1:34PM C:\Users\CarlsbrookDocuments\CarlsBrook\LONDON CITY AIRPORT\Record Drawings\Blue Shed\1st Floor\R_BS_1_A_001 1ST FLOOR COORDINATED Rev A.dwg

Plan 7

DO NOT SCALE - IF IN DOUBT ASK

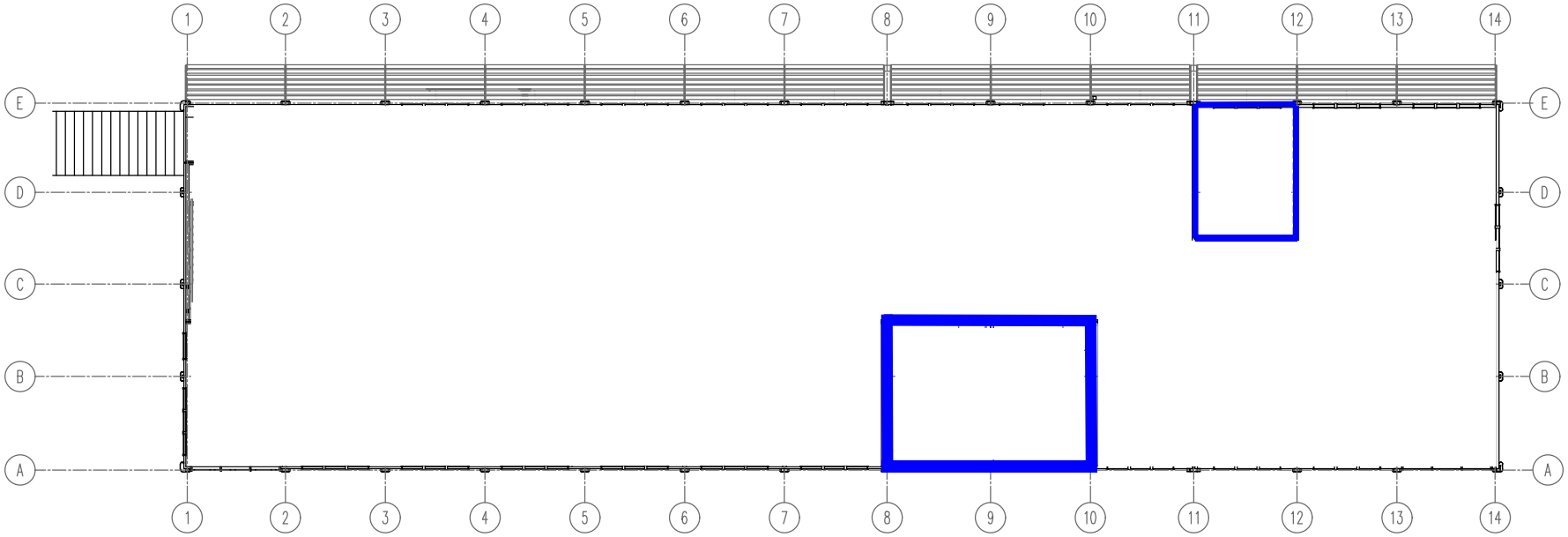
Associated Drawings

General Notes:

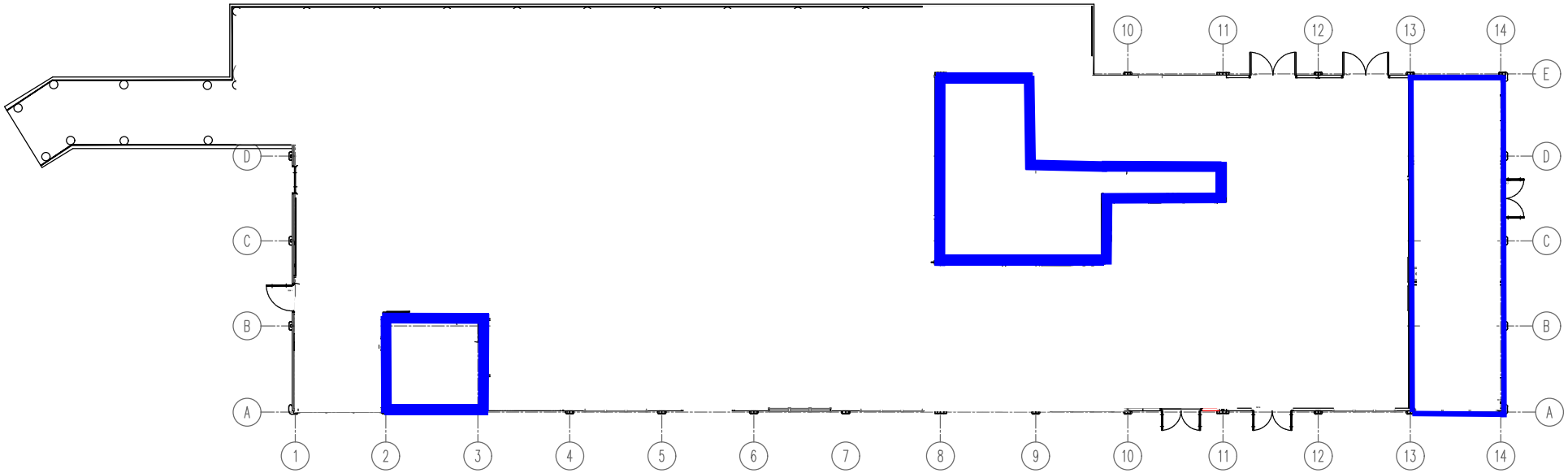
LEGEND

(X/XXX) Fire Door

(X/XXX) Standard Door



Jet Centre - Floor



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

G-1 FLRS

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

RECORD DRAWING

JET CENTRE

Drawing Title
Ground to First Floor
General Arrangement Plan

Date	Drawn	Check	Appd
24/07/15	VR	-	-

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

Scale 1:75

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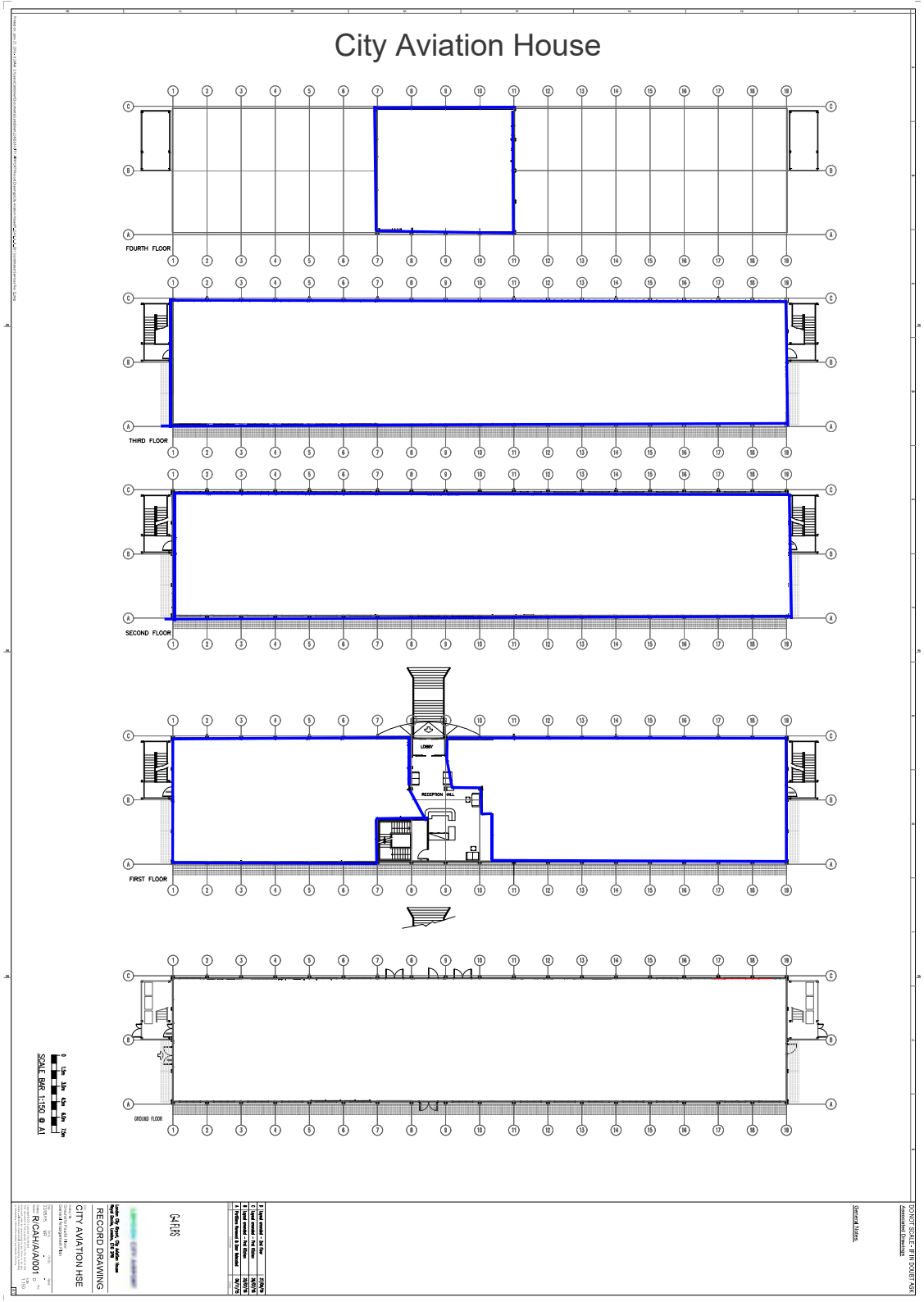
A1

0 (0.5m) 1.5m 2.25m 3.0m 3.75m

SCALE BAR 1:75 @ A1

Printed on: August 16, 2018 – 11:14AM C:\Users\Carlabrent\Documents\CarlaBrent\LONDON CITY AIRPORT\Record Drawings\Jet Centre\R_JC_A_A_001 Coordinated Services Rev D.dwg

Plan


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

SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS

(1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.

(2) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org

CLAIM NO: KB-2024-001765

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LONDON CITY AIRPORT LIMITED

(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

and

PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER DEFINED IN THE CLAIM FORM

Defendant

NOTE OF "WITHOUT NOTICE" HEARING BEFORE

MR JUSTICE JULIAN KNOWLES

20 June 2024

The hearing commenced at 10:30.

Mr Justice Julian Knowles was familiar with the jurisdiction having granted the HS2 "route wide" injunction *[2022] EWHC 2360 (KB)* and the ESSO Southampton London Pipeline injunction *[2023] EWHC 2013 (KB).*

The Judge had read the hearing bundle and the Claimant's skeleton argument and he had received the authorities bundle.

YV introduced the papers and handed up reports of incidents at Stonehenge on 19.06.24 and at Stanstead Airport on 20.06.24.

The Judge acknowledged this material as evidencing that protests were starting to happen.

YV proposed a "route map" which followed his skeleton argument.

1. The airports campaign + the risk of harm
2. The Claimant's decision to apply "without notice"
3. The site
4. The draft Order
5. The relevant legal tests and
6. The Claimant's submissions
7. The Claimant's obligation to give full and frank disclosure

1. The airports campaign + the risk of harm

YV referred to paras 4 – 12 of his skeleton argument.

YV noted that the October 2019 incident had been organised by Extinction Rebellion (not Just Stop Oil).

YV referred to:-

- the following paragraphs of Alison FitzGerald's w/s
    - 6-10 – the airport business;
    - 19-26 – the October 2019 incident at London City Airport;
    - 27-32 – health and safety issues;
    - 35 – the Met police;
- the photograph of James Brown having glued himself to the top of an aircraft at London City Airport in October 2019 at "AMF3" (HB/90); and
- the Daily Mail article dated 9 March 2024 (which broke news of the JSO's 2024 airports campaign) at "SSW5" (HB/257-263).

The Judge noted the unusual location of London City Airport being close to a city centre.

2. Without Notice

YV referred to paras 13-16 of his skeleton argument.

Whilst the Judge acknowledged that CPR 25.3 and s.12 HRA 1998 may not technically apply, he suggested that those tests be addressed on a belts and braces approach.

YV submitted that there were good or compelling reasons for the application being made without notice (notwithstanding his submission that this test does not extend to claims against classes of Persons Unknown). The good and compelling reasons were that if JSO were notified of the application for an injunction before the hearing they may well decide to take direct action before the injunction took effect (which would only happen once all the steps of notification had been completed): (1) this would lead to a risk of severe harm; (2) JSO may defeat the very purpose of the injunction. Although it could be argued that this was not a case involving, e.g., blackmail or freezing orders, there could be irreversible harm if a serious accident occurred or other disruption to passengers; and, (3) in circumstances where they had no right whatsoever to do so. YV referred to *Birmingham CC v Afsar* [2019] EWHC 1560 where Warby J referred to the fact that this might not be a relevant consideration. But YV tried to distinguish that case on the basis that Article 10/11 ECHR would not protect JSO in this case as it was on private land.

The Judge noted that all of the land in respect of which the Claimants seek an injunction is private land and commented that the position had not been so straightforward in the HS2 route wide injunction.

YV referred to p.719 of the White Book, para 25.3.3 and the reference to the Privy Council judgment in *National Commercial Bank Jamaica v Olint Corp*. That judgment purported to set out 2 bases for going without notice: where there is no time to notify and where notifying would defeat the purpose of the injunction. YV argued that this case was in the specific context of banking and could not and was not purporting to speak to the gamut of cases, including the present one relating to trespass on private land.

3. The Site

YV explained Plan A, Plan 1 and Plans 2-8.

YV explained that the internal layout of buildings had been redacted for reasons of national security.

YV confirmed that the Judge was correct in surmising that some of the areas edged blue in the main terminal building were retail areas.

YV explained the points at which Hartmann Road ceases to be an adopted highway and the point where Hartmann Road passes through a subway below the DLR.

In relation to the location of warning notices, the Judge noted that although the airport could be accessed from the docks, the Claimants were not proposing to post warning notices in those locations. YV argued that anyone seeking to access the airport from the docks would clearly be part of the campaign of direct action and would likely know about the injunction once JSO were notified. They would also only be subject to the injunction if they fell within the definition of Persons Unknown. Instructions were taken from the Claimants Head of Legal who referred to the fact that the water level changes as the docks are tidal and that airport regulations would need to be considered before any notices could be affixed to stakes so close to the runway. The Judge was satisfied that the Claimants had considered the most appropriate places to affix the warning notices.

4. The Draft Order

YV explained that the Claimants were seeking a 5 year injunction subject to annual review.

Strictly speaking, it was neither an interim nor a final injunction.

YV referred the Judge to the fact that 5 years plus an annual review appeared to have become the standard duration for injunctions which protect oil and gas refineries and terminals and he referred to the cases listed at paragraph 7.13 of YV's text book.

The following amendments were made:-

- in recital a – the reference to "Plans 2-9" was changed to "Plans 2-8
- in para 1 - the date was changed from 12 June 2027 to 20 June 2029
- in para 7 c – the wording was changed to allow the Claimants to include notification of the proceedings on the injunction warning notice

5. Legal Tests

YV referred the Judge to para 58 of Ritchie J's decision in Valero v PUs dated 26 January 2024 *[2024] EWHC 134 (KB)* in which Ritchie J set out his distillation of the 15 substantive requirements which the Claimant needed to satisfy. On the test to be satisfied for requirement number 3, YV accepted the test was higher than the serious issue to be tried threshold in *American Cyanamid*. He said whichever test you apply – "likely" to succeed at trial or the summary judgment test as in *Valero* – Cs satisfied it.

The Judge noted that there is no right to protest on private land "full stop".

YV referred the Judge to the following paragraphs in Ritchie J's decision in HS2 dated 24 May 2024 *[2024] EWHC 1277 (KB)* – 4, 5, 13, 15, 17 and 58-59.

The Judge noted that in substance if not in form, the Claimants were seeking a final injunction.

YV referred to an error in para 58(13) of Ritchie J's judgment in Valero (the Judge referred to alternative service on Persons Unknown (which is inconsistent with *Wolverhampton CC v London Gypsies and Travellers [2024] 2 WLR 42 (SC)* – see footnote 7 on p 11 of YV's skeleton argument).

6. The Claimants' submissions

YV addressed each of the 15 substantive requirements set out in Ritchie J's decision by reference to para 24 of his skeleton argument.

7. Full and Frank Disclosure

YV said that it might be said against the Claimants that:-

- the Claimants should proceed after giving notice (YV had already addressed this);
- there was no evidence of a direct threat against London City Airport (again YV had addressed this);
- the Public Order Act 2023 includes offences which are related to protest (the Judge said that the criminal law has a different purpose and that criminal proceedings can take a long time. YV agreed and also referred to the facts that: (1) landowners are entitled to vindicate their private rights; (2) enforcement would be up to Cs; (3) of the protestors who had been arrested and charged with criminal offences following the October 2019 incident at London City Airport, only James Brown had been convicted; and, (4) the police themselves had recommended LCY consider obtaining an injunction.

The Judge said that he would grant the Order as sought, subject to the minor amendments discussed, but that rather than giving an *ex tempore* judgment, he would provide written reasons in due course.

The hearing concluded at 11:45 am

From:	KB Judges Listing Office
To:	Wortley, Stuart; "Connor McGilly"; Evie Barden; Property Clerks; EvershedsCourtClerk
Subject:	KB-2024-001765 London City / KB-2024-002132 Manchester / KB-2024-002317 Leeds Bradford / KB-2024-002473 Birmingham Airports -v- Unknown and Ors
Date:	05 June 2025 12:58:09
Attachments:	image001.png image005.png image006.png image002.png image003.png image008.png

Dear all,

In accordance with the Order of Mr Justice Julian Knowles, dated 20th June 2024

The **Injunction Review hearing** in this matter has been listed for **24th June 2025** for **1 day** before a High Court Judge, in person.

The following Claimant's/Claimants' applications (all dated 2nd June 2025) will also be considered at this hearing:

KB-2024-001765 London City Airport Limited and another -v- Unknown
KB-2024-002132 Manchester Airport PLC and others -v- Unknown and others
KB-2024-002317 Leeds Bradford Airport Limited and others -v- Unknown and others
KB-2024-002473 Birmingham Airport Limited and others -v- Unknown and others

The Judge and time of the hearing will be confirmed on the working day before on the Daily Cause List (from 3pm):
https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list#kings-bench-judges-daily-cause-list

Please forward a copy of this listing notice to all interested parties.

Kind regards

Kind regards

Subash Vasudevan
Judges Listing Office Team Leader
8x8 Contact Centre Supervisor

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DX: 44450 Strand | T: 020 3936 8957 | | W: www.gov.uk/hmcts

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N244

Application notice

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Name of court **The High Court of Justice** **King's Bench Division**	**Claim no.** **KB-2024-1765**
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
	H W F - - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) London City Airport Ltd and another	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	2 June 2025 02 Jun 2025

HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
KB-2024-001765

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

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

   If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?
   1. To list a hearing (time estimate 1 day) to review the injunction made by order of Julian Knowles J dated 20 June 2024, on 20 June 2025 or as close to that date as is convenient for the Court.

   2. To consolidate the claim under CPR rule 3.1(2)(h), alternatively case manage and hear it under rule 3.2(i) and/or (p) with the following claims:
   (a) Manchester Airport plc and ors v PU - claim no KB-2024-002132;
   (b) Leeds Bradford Airport Ltd and ors v PU - claim no KB-2024-002317; and
   (c) Birmingham Airport Ltd and ors v PU - claim no KB-2024-002473 ("**the Other Airports Claims**").

4. Have you attached a draft of the order you are applying for? ☒ Yes ☐ No

5. How do you want to have this application dealt with? ☐ at a hearing ☒ without a hearing
   ☐ at a remote hearing

6. How long do you think the hearing will last? ☐ Hours ☐ Minutes
   Is this time estimate agreed by all parties? ☐ Yes ☐ No

7. Give details of any fixed trial date or period: N/A

8. What level of Judge does your hearing need? High Court Judge

9. Who should be served with this application?

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

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

☐ the attached witness statement

☐ the statement of case

☒ the evidence set out in the box below

If necessary, please continue on a separate sheet.

1. The order of Julian Knowles J is attached, together with the orders made by:-

   (a) HHJ Coe KC dated 5 July 2024 made in claim no KB-2024-002132

   (b) Ritchie J dated 18 July 2024 (and amended pursuant to the slip rule on 19 and 22 July 2024) made in claim no KB-2024-00217; and

   (c) Jacobs J dated 6 August 2024 made in claim no KB-2024-002473.

The review hearing

2. Paragraph 3 of the order of Julian Knowles J in the instant case requires such review *"... 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"*.

3. The Claimants invite the Court to list the review hearing pursuant to paragraph 3 of that order on 20 June 2025 or as soon as is convenient thereafter.

4. Although paragraph 3 of the order of Julian Knowles J states that the hearing shall be listed with a time estimate of 1.5 hours, the Claimants invite the Court to list the hearing for 1 day for the reasons set out below.

Consolidation / case management with the Other Airports Claims

5. All of the injunctions granted in the Other Airports Claims are subject to review at 12 month intervals and the Claimants in those cases also seek review of the injunctions and have, by Eversheds Sutherland (International) LLP also made applications of even date to this application (and also for consolidation or case management with this case and the Other Airports Claims.

6. In those cases:

   (a) Paragraph 2 of the order of Jacobs J dated 6 August 2024 made in claim number KB-2024-002473 provides a time estimate of 2.5 hours for the hearing of the review of the injunction made in that claim.

   (b) No time estimate is provided in HHJ Coe or Ritchie J's orders. However, it is anticipated that a similar time estimate would be required.

7. In view of the similarity of factual and legal issues in this claim and the Other Airports Claims, it would be beneficial for the claims to be consolidated, alternatively case managed and heard together, in order to determine the cases in accordance with the overriding objective and in specific to (a) minimise the demands placed on the court resources by a multiplicity of hearings which would require more than a day of court time; and (b) avoid the risk of inconsistent decisions.

8. The Court is invited to make an order on the papers in the form of the draft order. The Claimants will notify the Defendants of any order made by the Court and the application following the making of the order.

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

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

☒ No

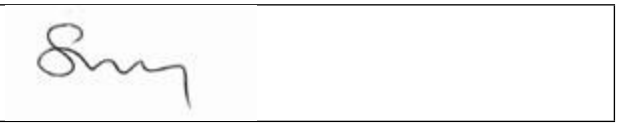
Statement of Truth

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

☒ **I believe** that the facts stated in section 10 (and any continuation sheets) are true.

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

Signature



☐ Applicant

☐ Litigation friend (where applicant is a child or a Protected Party)

☒ Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
2	June	2025

Full name

Stuart Sherbrooke Wortley

Name of applicant's legal representative's firm

Eversheds Sutherland (International) LLP

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

Partner

Applicant's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Greater London

Postcode

E	C	2	V	7	W	S

If applicable

Phone number

0771 288 1393

Fax phone number

DX number

Your Ref.

SSW/AW/EP/292659.000057

Email

stuartwortley@eversheds-sutherland.com

Party: *Claimants*
Name: *S S Wortley*
Number: *Second*
Date: *06.06.25*
Exhibits: *"SSW8" – "SSW14"*

CLAIM NO: KB-2024-1765

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LONDON CITY AIRPORT LIMITED

(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

and

PERSONS UNKNOWN
MORE PARTICULARLLY DESCRIBED
IN THE CLAIM FORM

Defendants

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

I STUART SHERBROOKE WORTLEY of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a partner in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants.

2. On 20.06.24, Mr Justice Julian Knowles granted an injunction to restrain the Defendants from entering, occupying or remaining on the Land (as defined in the Order of that date) until 20.06.29.

3. Paragraph 3 of the Order dated 20.06.24 provided for the injunction to be reviewed by the Court 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 1.5 hours and permitted the Claimants to file and serve any evidence in support 14 days before the review hearing.

4. I make this witness statement for the purposes of the review hearing which has been listed on 24.06.25.

2024 Airport Injunctions

5. Between 20.06.24 and 14.08.24, the following injunctions were granted to protect airports against environmental protestors opposed to the use of fossil fuels.

	Airport	**Action Number**	**Judge / Date of Order**
1	London City Airport	KB-2024-001765	Mr Justice Julian Knowles 20 June 2024
2	Manchester Airport Stansted Airport East Midlands Airport	KB-2024-002132	HHJ Rosalind Coe 5 July 2024
3	Heathrow Airport	KB-2024-002210	Mr Justice Julian Knowles 10 July 2024
4	Leeds Bradford Airport Luton Airport Newcastle Airport	KB-2024-002317	Mr Justice Ritchie 18 July 2024
5	Gatwick Airport	KB-2024-002336	Mr Justice Ritchie 19 July 2024
6	Birmingham Airport Bristol Airport Liverpool Airport	KB-2024-002473	Mr Justice Jacobs 6 August 2024
7	Southend Airport	KB-2024-002596	Mrs Justice Farbey 14 August 2024

6. Last year it was possible to achieve a certain amount of co-ordination with a view to saving costs and limiting the demands placed by these matters on Court resources, in that my firm acted in 4 out of the 7 actions listed above (numbers 1, 2, 4 and 6). However, our instructions arrived over time rather than all at once, and so multiple hearings were needed, despite the common ground between the different matters.

7. Although the precise terms of the Orders vary slightly, each of the injunctions granted in actions 1, 2, 4 and 6 in the table effectively provides for an annual review.

8. This year, therefore, there is the potential to achieve better co-ordination with a better use of the Court's time: London City Airport and the 9 other airports involved in actions 2, 4 and 6 have decided to join together and to ask the Court to undertake the annual review at the same hearing. I was not instructed in relation to the other airports last year (Heathrow, Gatwick and Southend): I believe they remain represented by other firms of solicitors. I understand that the solicitors for Heathrow and Southend Airports have arranged a review hearing sometime next month.

9. As noted above, the Order in this action provided for a review hearing of 1.5 hours duration. The Order in action 6 provided for a review hearing of 2.5 hours duration. The Orders in actions 2 and 4 did not specify a time estimate for the review hearing. The Court has now listed the review hearings in all 4 actions together, with a time estimate of 1 day on 24 June 2025.

10. I make this witness statement in support of the review of the London City Airport injunction. I will be repeating or adopting much of the content of this witness statement in my statements in support of the annual reviews of the injunctions granted in the other actions.

Service of the Order dated 20.06.24

11. In accordance with paragraph 8 of the Order dated 20.06.24:-

    11.1. the injunction website was established on 21.06.24;

    11.2. the warning notices were erected in each of the locations identified on Plan 1 to the Order on 21.08.24; and

    11.3. I sent a copy of the Order by email to each of the email addresses in Schedule 3 to the Order at 17:51. This was the last of the 3 steps to be carried out and so the injunction became effective at that time.

The Plans

12. The injunction which was granted in this action is limited to the area to which the Claimants would be entitled to a remedy in trespass, based strictly on their proprietary interests.

13. By comparison, the later injunctions (ie, those granted in actions 2, 4 and 6) extend beyond the area to which the airport might be entitled to a remedy in trespass, to include highways and areas demised to third parties. This was because of the different and in my view more appropriate argument and analysis presented in actions 2, 4 and 6 compared with action 1. The points made in later actions which were not made in action 1, included the importance of making the injunction effective even if it might minimally restrain conduct that would otherwise be lawful; and also based on the fact that the byelaws for those airports cover an area which is not co-extensive with land ownership.

14. The injunction in this case was granted first in time and extends to the land edged red on Plan 1 but excludes:-

    14.1. the areas shaded blue on Plan 1 (which were demised to third parties when this action was issued);

    14.2. the areas shaded green on Plan 1 and edged blue on Plans 2-8 (parts of buildings which were demised to third parties when this action was issued);

    14.3. that part of the suspended section of the Docklands Light Railway shaded purple on Plan 1; and

    14.4. the underground rail tunnel, subway and part of the Docklands Light Railway shaded pink on Plan 1.

15. I am informed by Claire Hortop Head of Legal at London City Airport that:-

    15.1. since the injunction was granted on 20.06.24, a further parcel of land between Hartmann Way and Woolwich Manor Way has been demised to Royal Docks Management Authority. This area is shown coloured blue on the plan at **"SSW8"** and should also be coloured blue on Plan 1 (and therefore excluded

from the injunction, applying the logic which underpinned the original application);

15.2. there has been no change to Plans 2 – 8 (which show those parts of buildings demised to third parties).

16. The Claimants have — conservatively — decided not to ask the Court to expand the injunction based on the analysis and arguments which found favour in later cases. Instead, they will invite the Court to review the injunction on the same basis as it was obtained last year. This will involve updating Plan 1 in the manner described above, and amending the Claim Form so as to exclude the area mentioned in 14.1 above. This way, the order (if continued by the Court) will, as before, extend only so far as the areas to which the Claimants would be entitled to a cause of action in trespass.

UK Airport Protests

17. The table below records a summary of the protests against UK airports which took place in June – August 2024. It also includes a summary of the arrests, convictions and subsequent sentencing and other relevant incidents occurring after August 2024.

02.06.24	Extinction Rebellion conducted a protest at Farnborough Air Show which involved blocking the 3 main gates and parking the Extinction Rebellion pink boat across the Gulfstream gate
20.06.24	Two JSO activists sprayed 2 aircraft at London Stanstead Airport with orange paint after cutting through the perimeter fence at around 5.00 am
25.06.24	Four JSO activists were arrested at Gatwick Airport railway station equipped with suitcases containing bandages (suspected to have been intended to force the airport to close owing to the risk of damage to aircraft engines in the event of them being released near aircraft)
27.06.24	Six JSO activists were arrested at a meeting in London pursuant to powers in the Public Order Act 2023
19.07.24	Roger Hallam (along with four other JSO activists) had been found guilty of conspiring to organise protests to block the M25 motorway in November 2022 Mr Hallam was sentenced to 5 years imprisonment and each of the others were sentenced to 4 years imprisonment (reduced by the Court of Appeal on 07.03.25 – see below)

24.07.24	Ten JSO activists were arrested at Heathrow Airport as part of an intelligence led operation - some were equipped with cutting gear and glue
27.07.24	A protest which was due to be held at London City Airport was relocated to the Department of Transport on Horseferry Lane
29.07.24	Eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure
30.07.24	Two JSO activists were arrested at Heathrow Airport after spraying orange paint around the Terminal 5 entrance hall and on the destination boards in the departure lounge
31.07.24	A protest by JSO and Fossil Free London was held at the Docklands Light Railway station at City Airport JSO and Fossil Free London both uploaded photographs of the protest with the following message:- *"We've been served with an injunction which means even walking out of the wrong exit of this station could get us arrested."*
01.08.24	Six JSO activists blocked access to the departure gates at Heathrow Terminal 5
05.08.24	Five JSO activists were arrested on their way to Manchester Airport equipped with bolt cutters, angle grinders, glue, sand and banners carrying slogans including "oil kills".
16.01.25	The trial of the two JSO activists arrested at Heathrow Airport on 30.07.24 resulted in a hung jury
02.02.25	Extinction Rebellion held a demonstration at Farnborough Airport following a consultation period in relation to Farnborough Airport's expansion plans which ended in October 2024
17.02.25	Extinction Rebellion held a demonstration at Inverness Airport waving banners with *"Ban Private Jets"* and *"We're in a climate emergency, we need to step up and take action"*
21.02.25	Of the five JSO activists arrested on their way to Manchester Airport on 05.08.24, four were found guilty of conspiracy to commit a public nuisance and one was acquitted with sentencing adjourned to 23.05.25
07.03.25	The Court of Appeal delivered judgment in a conjoined appeal by sixteen JSO activists against sentencing Two of the sentences passed on 19.07.24 were reduced by 18 months (from 4 years to 30 months), the other three were reduced by a year (from 5 to 4 years in Roger Hallam's case and from 4 to 3 years in the other two) Of the other eleven appeals, one was reduced by 2 months but the other ten appeals were dismissed

20.03.25	Of the ten JSO activists arrested at Heathrow Airport on 24.07.24, nine were found guilty of conspiracy to cause a public nuisance at Heathrow Airport with sentencing adjourned to 16.05.25
27.03.25	Just Stop Oil announced the end of their campaign (see below)
27.03.25	On the same day as the JSO announcement, Youth Demand held a meeting to discuss issues including the climate crisis and a fresh wave of civil resistance in London in the Westminster Quaker Meeting House Six individuals were arrested
27.04.25	Youth Demand activists threw bright pink powder over elite runners participating in the London marathon as they crossed Tower Bridge The individuals taking part wore T-shirts that read "Youth Demand – Stop Arming Israel" – which appears to be their primary cause
16.05.25	Of the nine individuals convicted on 20.03.25, five were sentenced to terms of imprisonment of up to 15 months and four were given suspended sentences
27.05.25	Each of the four individuals convicted on 21.02.25 was sentenced to a term of imprisonment of between 18 and 30 months

18. Copies of media articles relating to the events recorded in this table are attached to this statement marked **"SSW9"**.

19. A copy of the Court of Appeal decision handed down on 07.03.25 is attached at **"SSW10"**.

20. I consider that the fact that the protest on 27.07.24 was relocated from London City Airport to the Department of Transport and the fact that the JSO and Fossil Free London protestors conducted their protest from outside the red line of the injunction plan, demonstrate that the injunction granted by Mr Justice Julian Knowles on 20.06.24 served its purpose. In both instances peaceful protests went ahead but without causing unlawful interference to users of London City Airport.

27.03.25 – JSO Announcement

21. As noted in the chronology above, on 27.03.25, Just Stop Oil made the following announcement:-

> *"Three years after bursting on the scene in a blaze of orange, at the end of April we will be hanging up the hi vis.*

Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful.

So it is the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison. We have exposed the corruption at the heart of our legal system, which protects those causing death and destruction while prosecuting those seeking to minimize harm. Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK's oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen.

This is not the end of civil resistance. Governments everywhere are retreating from doing what is needed to protect us from the consequences of unchecked fossil fuel burning. As we head towards 2°C of global heating by the 2030s, the science is clear: billions of people will have to move or die and the global economy is going to collapse. This is unavoidable. We have been betrayed by a morally bankrupt political class.

As corporations and billionaires corrupt political systems across the world, we need a different approach. We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Nothing short of a revolution is going to protect us from the coming storms.

We are calling on everyone who wants to be a part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. Sign up here. See you on the streets.

ENDS"

22. Copies of media articles relating to this announcement and to the "final" JSO protest which took place in central London on 26.04.25 are attached marked **"SSW11"**.

23. Taken at face value and if JSO were the only participants, this would signal a material reduction in the risk posed to all airports by disruptive climate protest.

18.05.25 - We are "plotting a very big comeback"

24. However, on 18.05.25 the following story appeared on GB News (both on television and on-line):-

> *"Now, I was getting pretty bored of the juvenile antics at the altar of climate change.*
>
> *We've seen it all vandals throwing soup over priceless artworks in galleries, defacing Stonehenge, ambushing theatre productions in the West End, blocking traffic, scaling motorway gantries, dousing*

private jets in paint, and even disrupting sports events all just to spoil the fun for everyone else.

Remember them? They said they were disbanding after the government appeared to adopt their demand to end new oil and gas licences in Britain. Their actions, of course, cost the public tens of millions in police and court time.

But despite Ed Miliband bowing to their demands, I can exclusively reveal that Just Stop Oil is plotting a very big comeback.

On Ben Leo Tonight, we have gained access to secret Just Stop Oil meetings, where members are discussing a dramatic U-turn—planning to cause chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and even carrying out "citizens' arrests" on so-called climate criminals.

Speaking during an online meeting on Thursday night, one coordinator—known only as "Dave"—said protests should remain "action-based" and warned against becoming more peaceful, like Greenpeace.

The meeting continued with Dave insisting that it was essential to keep doing what he called the "spicy and naughty stuff" to generate media attention.

The group also discussed how to feed new protest ideas back to what they referred to as a "core team". There was frustration over communication with this mysterious leadership group, with some suggesting using 50-word briefs to make it easier for them to process ideas.

It raises serious questions: Who exactly is this core team? Who are these professional protesters reporting to—and who's funding them?

Chillingly, the group also spoke about carrying out citizen's arrests on so-called climate deniers. There was some introspection as well, with members questioning whether their public image was doing more harm than good.

But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to proceed with Just Stop Oil's revival, including talk of keeping protesters in safe houses to maintain morale.

Let's be clear: what we're dealing with here is a group of climate zealots plotting to commit criminal acts, backed by who knows what kind of funding, and being housed like some kind of eco-mafia.

And speaking of coordination—let's not pretend the climate agenda is a spontaneous grassroots movement. It's organised. It's funded. It's political.

So, who's paying to bus these protesters from London to Stonehenge, to airports, to art galleries and sports stadiums? Who's funding the Just Stop Oil safe houses where these scruffy, self-

righteous agitators meticulously plan how to make Britain colder and poorer?

The police and the government must crack down on Just Stop Oil's plans for criminality before they gain traction again.

The last thing Britain needs is more disruption, more vandalism, and more self-indulgent eco-activism especially when a Labour government is already happily marching to the drumbeat of Net Zero extremism.

We'll be passing our findings to the police."

25. For my part, I acknowledge the possibility that this is tainted by sensationalism. However, JSO did not take efforts to repudiate what had been alleged. Instead, on 21.05.25, JSO circulated a link to the GB News story in a message to subscribers together the following comment:-

"GB News was right for once. We are "plotting a very big comeback".

26. Copies of the GB News story and the JSO message to subscribers are attached to this message marked **"SSW12"**.

Other Environmental / Climate Campaign Groups

27. Apart from JSO, there are other protest groups who are opposed to the use of fossil fuels including for example, Youth Demand (the junior branch of JSO formerly known as Youth Climate Swarm), Extinction Rebellion and Fossil Free London.

28. Extinction Rebellion ("XR") remains an active organisation both in the UK and internationally:-

28.1. on 07.09.24, XR activists chained themselves to the gates of the Rijksmuseum in Amsterdam in an attempt to force the museum to sever ties with ING Bank;

28.2. on 25.09.24, XR activists covered the Finnish Parliament House with red paint;

28.3. on 23.05.25, XR activists held a climate protest against Total Energies and its partners – including the occupation of BNP Paribas' offices in Paris.

29. Fossil Free London is another protest group involved in direct action. Their website includes videos which promote the right protest and training videos relating to direct action.

30. A relatively new organisation which is campaigning against the fossil fuel industry is "shut the system". In January 2025, this group cut fibre optic cables to Lloyds of London and prominent buildings involved in the insurance sector on Fenchurch Street, Threadneedle Street, Leadenhall Street and Lime Street in London (and in Birmingham, Leeds and Sheffield).

31. An article concerning this story is attached to this statement marked **"SSW13"**.

Police Advice

32. On 21.05.25, the Metropolitan Police sent an email to the security team at London City Airport which included the following:-

> *" … the injunction at HAL [Heathrow Airport Limited] had a real impact on the Shell protest yesterday and builds on your experiences. To remove an injunction now would open up to further protest and whilst JSO have stepped down there appears to be a cycle of new groups emerging and this cannot be ruled out so maintaining it would be very much recommended."*

33. I believe the reference to *"… the Shell protest …"* relates to the Annual General Meeting of Shell plc held at the Soffitel Hotel at Heathrow Terminal 5 on 20.05.25. The Metropolitan Police told London City Airport's security team that a protest by environmental protest groups:-

> "*were forced to hold their protest at the Shell head office in central London rather than the AGM location at a hotel within the Heathrow Airport injuncted area, in order to avoid the risk of associated penalties for breaching of the injunction*."

34. I believe the references to *"… your experiences …"* is a reference to the events referred to in paragraph 19 above – including the fact that one of the protests due to take place at London City Airport was relocated to the Department of Transport.

35. A copy of the email (from which I have redacted personal information) is attached to this statement marked **"SSW14"**.

Conclusion

36. I am informed by Claire Hortop and believe the Claimants' directors have concluded that they should ask the Court to extend the injunction for a further 12 months from June 2025. I understand that they reached this decision after having considered carefully whether the threat which was clearly present last year has abated materially, especially in light of the JSO announcement in March.

37. Obviously, the question of whether the injunction has outlasted its need, is one for the judgment of the Court. However, based on the material to which I have referred, the Claimants (and, for what it is worth, I also) consider that there remains a compelling need for the injunction to remain in place. Climate change remains firmly on the political agenda. It continues to attract strong feelings and is still a subject about which campaigners are willing to contemplate disruptive action. The inference drawn by the Claimants (and by me) is that the injunctions granted over time have influenced the pattern of protest, which disruptive action being focused principally on targets which do not have the benefit of the Court's protection by way of injunction. The Claimants (and I) consider that the risk remains high that airports generally, including theirs, would come back into focus, if the injunction were now to be lifted. JSO's seeming change of heart in March 2025 was not adopted by all other campaign groups; and even as a statement of JSO's position, later events have shown that it was not an immutable repudiation of disruptive protest. The Claimants (and I) cannot discount the possibility, that JSO's March 2025 announcement may have been partly tactical: to make renewal of the injunctions harder — and disruptive protest at the airports correspondingly less risky. The risks are especially acute at this time of year: most of the incidents in which UK airports were targeted by environmental protestors in 2024 occurred between late June and August 2024 - the busiest period for holiday travel.

Notice of the Review Hearing

38. The Claimants intend to give notice of the review hearing in the manner provided for in para 11 of Order dated 20.06.24 – namely by:-

    38.1. uploading details of the application dated 02.06.25, the draft Order, a copy of this witness statement and exhibits and details of the review hearing to the injunction website;

38.2. sending copies of the documents referred to in the previous paragraph to the 3 JSO email addresses referred to in Schedule 3 to the Order dated 20.06.24 plus the following additional email addresses (noting that "Shut The System" does not operate a website and although "Fossil Free London" does have a website, this does not include an email address):-
YouthDemandPress@protonmail.com
enquiries@extinctionrebellion.co.uk

38.3. affixing a notice at each of the warning notice locations referring to the time and date of the review hearing and explaining where copies of the additional papers can be found and obtained in hard copy.

I believe that the facts stated in this Witness Statement and Exhibits are true.

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

I am duly authorised to make this statement on behalf of the Claimants.



_____

Stuart Sherbrooke Wortley

6 June 2025

CLAIM NO: KB-2024-1765

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LONDON CITY AIRPORT LIMITED

(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

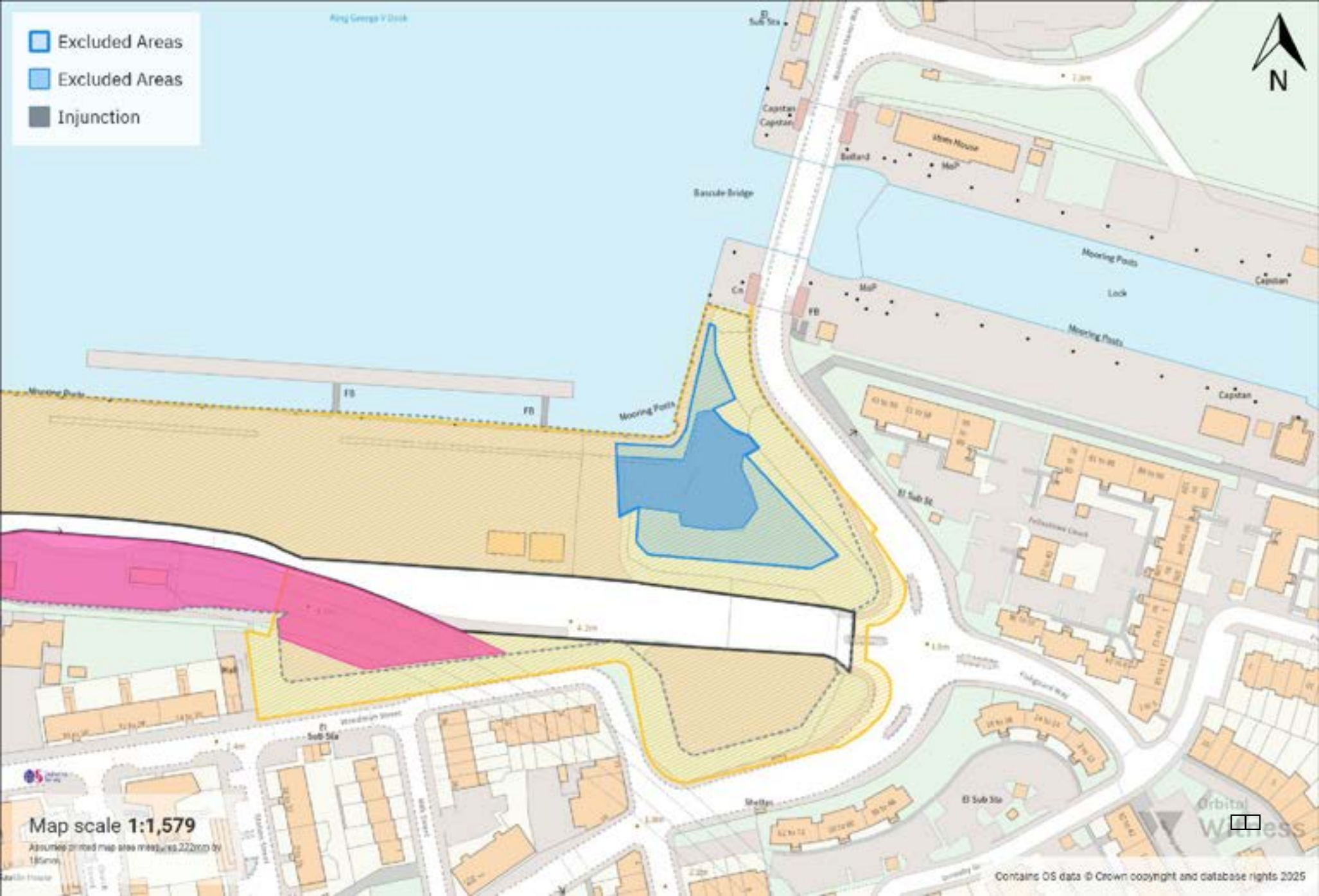
and

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

SSW8

This is the exhibit marked "SSW8" referred to in the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025.


Excluded Areas
Excluded Areas
Injunction
N
Map scale 1:1,579
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CLAIM NO: KB-2024-1765

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LONDON CITY AIRPORT LIMITED

(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

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

SSW9

This is the exhibit marked "SSW9" referred to in the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025.

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Climate activists blockade Farnborough private jet airport's three main gates

June 02, 2024 by Extinction Rebellion

Contact: Tom Maidment 07900 065913 | Carol 07791 737093
press@extinctionrebellion.uk
Location: W3W copy.tree.alarm
Images: Link for photos

Extinction Rebellion climate activists are blocking access to Farnborough Airport this morning (Sunday 2 June) to protest against the increasing use of highly polluting private jets by the super-rich and to call on the government to ban private jets, tax frequent flyers and make polluters pay.

Today's blockade is part of a global week of action against private aviation under the banner Make Them Pay with actions in Denmark, Germany, Mexico, Norway, Sweden, Switzerland and the US, and follows Europe's largest private jet convention EBACE in Geneva this week.

In Farnborough, protesters have barricaded the airport's Gulfstream Gate with the iconic XR pink boat with "LOVE IN ACTION" painted on the side, Ively Gate has four protesters locked on to oil drums, and the airport's departure gate has an activist mounted on a tripod blockading the entrance. Police have seized a second tripod.

A fourth group of protesters are playing cat and mouse with the airport authorities, moving between the airport's other gates to block them. At all three main gates, protesters are releasing colourful smoke flares, chanting slogans and engaging with members of the public, accompanied by the XR Rebel Rhythms band of drummers.

The activists are supported at all three main entrances to the airport by scores of demonstrators holding banners reading "FLYING TO EXTINCTION", "PRIVATE FLIGHTS = PUBLIC DEATHS", "STOP PRIVATE FLIGHTS", "PRIVATE FLIGHTS COST THE EARTH" and "TAX FREQUENT FLYERS".

Climate activists are targeting Farnborough Airport in an escalating campaign because it is the UK's largest private jet airport. Last year 33,120 private flights landed and took off from its runways, carrying an average of just 2.5 passengers per flight, making them up to 40 times more carbon intensive than regular flights. Currently 40% of flights to and from the airport are empty. The airport is now seeking planning permission to increase the number of planes taking off or landing from a maximum of 50,000 a year to up to 70,000 a year.

Farnborough Airport claims to be a centre for business aviation yet around 50% of Farnborough flights headed to the Mediterranean during summer months, rather than business locations, with around 25% heading to Alpine destinations during the winter months. Last year a service was launched specifically to shuttle dogs and their owners to Dubai and back.

The demonstration includes campaigners from Extinction Rebellion, who have joined forces with local residents, Quakers, and campaign organisations Farnborough Noise Group, Blackwater Valley Friends of the Earth, and Bristol Aviation Action Network to voice their opposition to the airport's expansion plans.

Dr Jessica Upton, 54, from Oxford, a Veterinary surgeon and foster carer 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."

Daniela Voit, 37, from Surbiton, a Shiatsu Practitioner and Teacher, said: "Last year we hit a global average temperature rise of 1.5°C degrees celsius over an entire year. For decades we were told a 1.5°C rise needs to be avoided to avoid catastrophic changes to our lives due to the planetary warming caused by humanity's CO2 emissions. We can see the consequences of this temperature rise all over the world – currently immense flooding in Brazil and Afghanistan and temperature of 52C in Pakistan. To carry on flying in private jets, one of the biggest causes for CO2 emissions per person, in a time of climate crisis is reckless. The rich 1% that are flying from Farnborough Private Jet Airport seem to think they are exempt from taking responsibility for what they are doing to our only home. Banning Private Jets is one of the first things we need to do to stop further temperature rises. This is vital to ensure the survival of all life – human, animal and plant – on this planet that we call our Mother Earth."

Make Them Pay demands:

1) Ban private jets. Flying in a private jet is the most inefficient and carbon-intensive mode of transport. Flights on private jets can be as much as 40 times more carbon-intensive than regular flights, and 50 times more polluting than trains. A four-hour private flight emits as much as the average person does in a year. Private jet use is entirely inappropriate during a climate emergency. There's strong public support for banning private jets and banning this mode of travel was a key recommendation of the Climate Assembly.

2) Tax frequent flyers. Various citizens' assemblies, for example in the UK, Scotland, and France, have recommended that frequent flyers and those who fly further should pay more.

They believe this would "address issues of tax fairness, as currently those who don't fly are subsidising those who do" and that "this would deliver significant behaviour changes across society and have a positive impact on reducing overall carbon emissions caused by flying."

Taxes on air travel would be a socially progressive way of raising climate funds and have been proposed by the group representing the most vulnerable countries at COP27 as an effective way to raise climate finance and pay for loss and damage, alongside debt cancellation.

3) Make polluters pay. It is only fair that the wealthiest in society and the highest-

income, highest-emitters pay for their climate damage, and pay the most into climate Loss and Damage funds for the most affected peoples and areas to mitigate and adapt to the worst impacts of climate change.

The top 1% of the global population by income are responsible for more emissions than the bottom 50% combined. So not only is it a question of morality that the wealthiest in society pay the most, and commit to the most rapid emissions reductions – it's also a mathematical necessity and a question of practicality and science.

About Extinction Rebellion

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

Donate | Support our work
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Why Citizens' Assemblies? | Breaking the political deadlock
XR UK Local Groups | View a map of all local groups
XR UK website | Find out more about XR UK
XR Global website | Discover what's going on in XR around the globe

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

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Women deny £52k spray paint damage to private jets



GETTY IMAGES

The jets appeared to have been sprayed at London Stansted Airport on Thursday

Alex Pope & PA Media
BBC News, Essex

22 June 2024

Two women have denied causing £52,000 worth of damage after private jets were sprayed with orange paint by Just Stop Oil activists at Stansted Airport.

Jennifer Kowalski, 28, and Cole Macdonald, 22, pleaded not guilty to causing criminal damage and interfering with national infrastructure.

Ms Macdonald, of Baker Street, Brighton, East Sussex, and Ms Kowalski, of Williamson Avenue, Dumbarton, in West Dumbartonshire, were not asked to enter pleas to a third charge of aggravated trespass.

Just Stop Oil had said the private jet of popstar Taylor Swift was at the Essex airport, but police said it was not there at the time.

The pair were accused of using angle grinders to break through an airport fence at about 05:00 BST on Thursday before entering a taxiway with fire extinguishers filled with orange spray paint.

Prosecutors said the cost of cleaning up the paint was £52,000, but the full extent of the damage to the fence and extra security was not known.

Chelmsford Magistrates' Court heard 75 flights were disrupted during a 38-minute delay, affecting thousands of passengers.

The pair were denied bail and were due to appear for another hearing at Chelmsford Crown Court on 22 July.

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Just Stop Oil protesters 'arrested and removed' after blocking Gatwick Airport

MERIDIAN | GATWICK AIRPORT | SUSSEX POLICE | Monday 29 July 2024 at 10:23am



Seven people entered the South Terminal at around 8am and "used suitcases with lock-on devices to block the departure gates", Just Stop Oil claimed.
Credit: Just Stop Oil

Just Stop Oil supporters who blocked departure gates at Gatwick Airport have been arrested and are being removed, the airport has said.

Seven people entered the South Terminal at around 8am and "used suitcases with lock-on devices to block the departure gates", Just Stop Oil claimed.

A video shared by the group showed the protesters sitting on the floor inside the airport, blocking an entrance.

Passengers with suitcases appeared to step over the activists and continue with their journeys.



A London Gatwick spokesman said: “London Gatwick is open and operating normally today.

“There are a small number of protesters at the airport who have now been arrested and are being removed from the airport.”

In central London, environmental protesters have caused criminal damage and blocked access to an office building on Old Queen Street in Westminster, the Metropolitan Police said.

One person has been arrested for criminal damage, and the incident is ongoing, the force added.

Last week, 10 Just Stop Oil activists suspected of planning to disrupt Heathrow Airport were arrested.

The latest action is part of the “Oil Kills international uprising”, the group said, taking place at airports around the world.

Earlier this month, the airport became the latest major airport to secure a High Court injunction in an attempt to stop would-be environmental activists trespassing on its land after receiving police intelligence over protest plans.

Timothy Morshead KC, representing Gatwick at the hearing, said such action could cause “severe disruption and financial loss” and “significant delays for passengers”.

A spokesperson for Sussex Police said: "Police responded to a report that protesters were demonstrating near the security entrance at the South Terminal in Gatwick Airport at around 8am today (July 29).

"Eight people have been arrested on suspicion of interfering with public infrastructure, and a heightened police presence should be expected at this time.

"The airport is functioning as usual, and no disruption has been caused by protest activity."

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itvX

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'.



Police are seen leading a Just Stop Oil activist away after arresting her and another five people at a supposed soup night in London this evening



An officer is seen speaking to another activist who had allegedly been part of a plot to cause mayhem for thousands of holidaymakers this summer by disrupting airports across the UK



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

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 see being led out of the hall in handcuffs as she is surrounded by several officers and other members of the public.

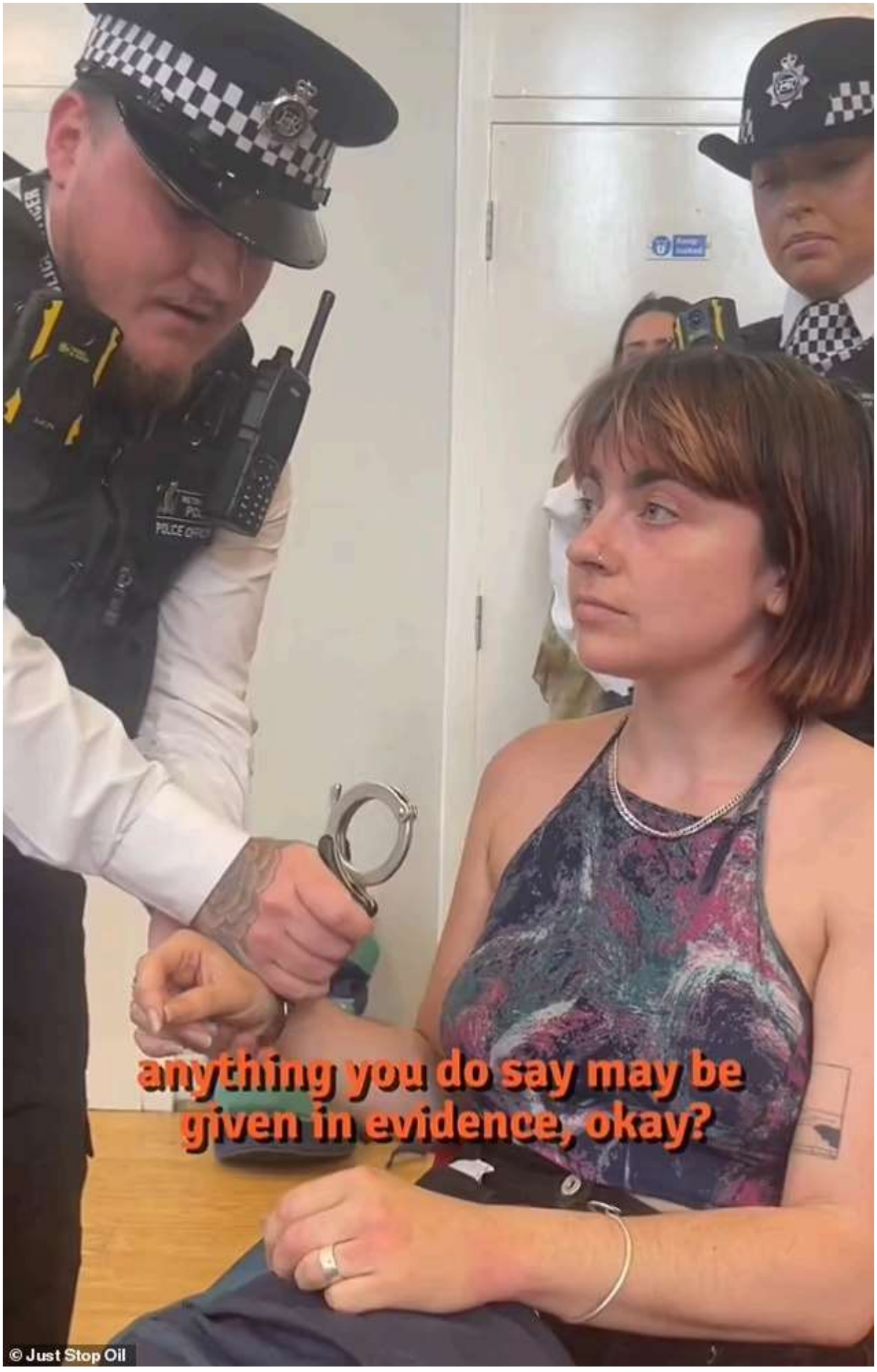
The video later cuts to a video of an activist, named Daniel, being arrested in a house by two police officers.

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.'



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



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

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.



A Just Stop Oil activist is seen stood in Stansted airport after spraying two private jets



Jennifer Kowalski and Cole Macdonald broke into Stansted airport's VIP airfield just hours after the pop sensation landed in London ahead of this weekend's Wembley shows

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.'



One activist can be seen spraying the fuselage and windows of two parked white planes with orange paint



Video shows the pair using a disc cutter to slice through a chain link fence at the airport's perimeter, before using fire extinguishers to spray orange paint on the aircraft

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 back 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'.



Just Stop Oil protesters spray Stonehenge with orange paint

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'.

Just Stop Oil founder Roger Hallam handed longest-ever jail sentence for peaceful protest over M25 chaos

Five Just Stop Oil protesters, including one of its co-founders, have been jailed for conspiring to organise protests that blocked the M25 motorway.

Roger Hallam, 58, Daniel Shaw, 38, Louise Lancaster, 58, Lucia Whittaker De Abreu, 35, and Cressida Gethin, 22, agreed to cause disruption to traffic by having protesters climb onto gantries over the motorway for four successive days in November 2022.

Hallam was sentenced to five years' imprisonment while the other four defendants were each handed four years' imprisonment.

Prosecutors alleged the protests, which saw 45 people climb up the gantries, led to an economic cost of at least £765,000, while the cost to the Metropolitan Police was more than £1.1 million.

They also allegedly caused more than 50,000 hours of vehicle delay, affecting more than 700,000 vehicles, and left the M25 "compromised" for more than 120 hours.



Just Stop Oil protesters caused delays on the M25
PA Media

A police officer suffered concussion and bruising after being knocked off his motorbike in traffic caused by one of the protests on November 9 2022, prosecutor Jocelyn Ledward KC said at the sentencing hearing at Southwark Crown Court on Thursday.

The sentences are thought to be the longest sentences ever given in the UK for non-violent protest, the Guardian reports, beating those given to Just Stop Oil protesters Morgan Trowland and Marcus

Decker for scaling the Dartford Crossing.

At the sentencing at Southwark Crown Court, Judge Christopher Hehir said: “The plain fact is that each of you some time ago has crossed the line from concerned campaigner to fanatic.

“You have appointed yourselves as sole arbiters of what should be done about climate change.”

The defendants, referred to as the Whole Truth Five by Just Stop Oil on social media, shouted “we love you” from the dock immediately after the sentences were passed down.

They were greeted by Just Stop Oil supporters as they were driven from prison to Southwark Crown Court on Thursday.

All five defendants joined a Zoom call on November 2 2022 in which discussions were held about the planned protests, based off “what was said expressly and what could be inferred”, and were aiming to recruit others for the protests on the call, Ms Ledward told the court.

On the call, Hallam reportedly said they intended to cause “the biggest disruption in British modern history” as the climate group repeated calls for the Government to end to new oil and gas exploration in the North Sea.

A journalist from the Sun newspaper, who had joined the call pretending to be interested in the protest, managed to record some of it and passed the recordings on to the police.

Judge Christopher Hehir said the Zoom call showed “how intricately planned the disruption was and the sophistication involved”, and was “compelling evidence” of the existence of a conspiracy.

There was “extensive organisation and planning” for the protests and each defendant had a “significant role” in the conspiracy, Ms Ledward said.

The defendants were convicted by a jury of conspiracy intentionally to cause a public nuisance, contrary to section 78 of the Police, Crime, Sentencing and Courts Act 2022 and Section 1 of the Criminal Law Act 1977, on July 11.

In a statement on Thursday Just Stop Oil said the five were sentenced to jail for “nothing more than attending a Zoom call”.

The judge told the court 11 protesters were arrested on suspicion of contempt outside the court during the case’s trial on July 2, but the court had discontinued its proceedings against them on July 11 after he became “concerned” about their position.

There have been no protests on the M25 since November 2022.

Ten climate activists charged after Heathrow protest



Ten Just Stop Oil supporters were arrested at Heathrow

26 July 2024

Ten Just Stop Oil (JSO) activists have been charged with conspiring to disrupt Heathrow Airport.

An intelligence-led operation led to 10 people being arrested either at the airport or in its vicinity on Wednesday, the Metropolitan Police said.

They were charged on Thursday with conspiracy to interfere with key national infrastructure under Section 7 of the Public Order Act 2003.

The group appeared at Westminster Magistrates' Court later on Thursday where Sally Davidson, 36, Adam Beard, 55, Rosa Hicks, 28, Rory Wilson, 26, Luke Elson, 31, Luke Watson, 34, Sean O'Callaghan, 29 and Hannah Schafer, 60, were remanded in custody.

Two people, Julia Mercer, 74, and William Goldring, 27, were bailed following their court appearance.

JSO said the action at the airport was part of an "international uprising" and demanded the government commit to ending the extraction and burning of fossil fuels by 2023.

The organisation said on Thursday evening that 13 groups across 10 countries had participated in the action over the past two days, which had involved about 37 arrests globally, including those held at Heathrow on Wednesday.

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Ten Just Stop Oil activists arrested at Heathrow

24 July 2024

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Almost 200 protest London City Airport's expansion plans

28 July, 2024 5:26 pm 3 Min Read

Activists chanted 'they fly, we choke', outside the Department of Transport yesterday. The government is shortly expected to make a decision on the airport's expansion, reports Marco Marcelline



Close to 200 air pollution and climate campaigners gathered outside the Department for Transport yesterday (27th July) to protest against the proposed expansion of a London airport with a flight path over Leytonstone.

Chanting 'they fly, we choke', protesters were calling on the Department of Transport to reject London City Airport's expansion bid.



The penalty for breaching the injunction could have been as much as two years in prison, activists said.

In July 2023, London City Airport's bid for expansion was unanimously rejected by Newham Council, but airport bosses appealed it, meaning a final decision will now be taken by the government.

The airport, based in the docklands, wants to extend its cut-off time for flights from 1pm on Saturdays to 6.30pm all year round and 7.30pm during the summer months, as well increasing its daily limit of flights from six to nine between 6.30am and 7am.

Speaking previously, the airport's CEO Robert Sinclair said the proposals were part of a wider plan to increase the number of annual passengers from 6.5million to nine million by 2031.

Sinclair has argued that if approved, more jobs would be made available for local residents, while there would be more affordable flights to different destinations. In terms of its environmental commitment, City Airport has pledged to use a "cleaner, quieter new generation aircraft".

But, environmental activists and local residents have long-argued that the airport causes significant pollution. Protesters have also stressed that it does not serve the communities living around it who cannot afford a plane ticket due to high levels of poverty in Newham.



Credit: Fossil Free London

The airport is popular with bankers flying in business class and in 2023, one in four flights leaving the ort were more than half empt

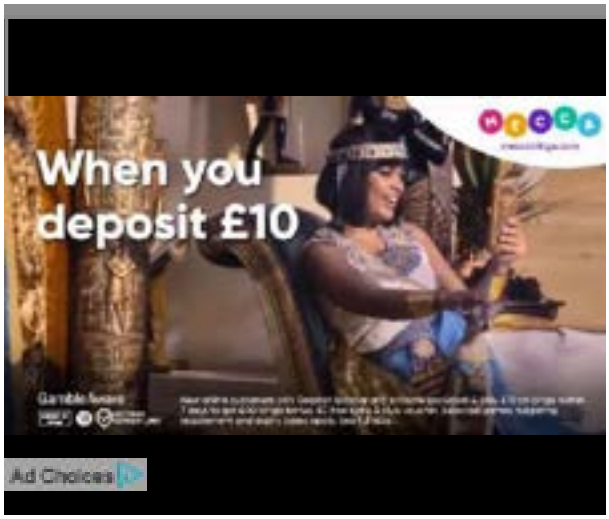
Joanna Warrington, spokesperson for Fossil Free London, said: “As businessmen fly off over one of London’s poorest boroughs, we’re left choking on their excess fumes that fuel climate collapse.

“London City Airport is pressing ahead with irresponsible expansion plans, despite the opposition of locals who are already sick of all the noise and air pollution over their homes. And worse still, after appealing a unanimous decision by the local council to stop an increase in flights, they’ve gagged local dissent through expensive and threatening anti-protest injunctions.

Joanna added: “Our government needs to listen to Londoners, reject these plans and act for our health and futures.”

Toni Cottee from South West Essex Fight the Flights said: “Flights have been growing and growing in number with bigger and bigger jets, more and more disturbance and emissions. Local people can’t have a conversation in their own front gardens when the planes are going over. Now the airport wants to increase this and abandon the only respite residents get at the weekend.

“We need this airport closed. It’s in the wrong place and we’re living in a climate emergency – we need to reduce flights, not increase them.”



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Just Stop Oil protesters arrested after trying to block Gatwick Airport departure gates



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Just Stop Oil protesters who tried to block departure gates at Gatwick Airport have been “arrested and are being removed”, the airport said.

Police responded to a report that protesters were demonstrating near the security entrance at the South Terminal in Gatwick Airport at around 8am on Monday. Sussex Police said eight people were arrested on suspicion of interfering with public infrastructure, and no disruption was caused by the protests.

A London Gatwick spokesman said: “London Gatwick is open and operating normally today.

“There are a small number of protesters at the airport who have now been arrested and are being removed from the airport.”

The environmental protest group shared footage of demonstrators sitting on the floor at one of the airport’s gate as frustrated travellers climbed over them.

The group claimed to use suitcases with lock-on devices to block the departure gates and protesters were spotted wearing Just Stop Oil T-shirts, with their hands in orange-coloured boxes.

Passengers could be seen carrying their luggage over the protesters, who sat silently on the floor.

Just Stop Oil said they were joining 21 other protest groups taking part in an Oil Kills international uprising.

Mel Carrington, 63, a mother and former environmental consultant from Dorset, and Greg Sculthorpe, a mathematician from Doncaster, were said to be among the activists involved.

Protests have taken place at 17 airports across Europe, Canada and the US, Just Stop Oil said.

A Sussex Police spokesperson said: “Police responded to a report that protesters were demonstrating near the security entrance at the South Terminal in Gatwick Airport at around 8am today.

“Eight people have been arrested on suspicion of interfering with public infrastructure, and a heightened police presence should be expected at this time.

“The airport is functioning as usual, and no disruption has been caused by protest activity.”

In central London, environmental protesters have caused criminal damage and blocked access to an office building on Old Queen Street in Westminster, the Metropolitan Police said.

One person has been arrested for criminal damage, and the incident is ongoing, the force added.



Travellers climbed over Just Stop Oil protesters at Gatwick
Just Stop Oil

It comes after 10 protesters were arrested at Heathrow Airport or nearby on Wednesday following a Europe-wide campaign threatening summer travel chaos.

The activists were charged with conspiracy to interfere with key national infrastructure under Section 7 of the Public Order Act 2003.

Earlier this month, Gatwick became the latest major airport to secure a High Court injunction in an attempt to stop would-be environmental activists trespassing on its land after receiving police

intelligence over protest plans.

Timothy Morshead KC, representing Gatwick at the hearing, said such action could cause “severe disruption and financial loss” and “significant delays for passengers”.

Sussex Police has been contacted for comment.

Two Just Stop Oil activists arrested at Heathrow Airport after paint sprayed on departure board



Video from Just Stop Oil

Two Just Stop Oil activists have been arrested after they sprayed orange paint on departure boards at Heathrow Airport. The Metropolitan Police said the pair were held on suspicion of criminal damage. Officers “remain in the area to deal with any further offences”, the force added. The incident happened inside Terminal 5 on Tuesday morning. A Heathrow spokesperson said: “Working with partners we have quickly resolved a protest incident in Terminal 5 and all involved have been removed from the airport. “The airport continues to operate as normal and passengers are travelling as planned. “We are in full agreement that the aviation industry needs to decarbonise, but unlawful and irresponsible protest activity is not the way forward and will not be tolerated.” Climate activists have repeatedly targeted airports around the world in recent days, in a campaign named Oil Kills. Just Stop Oil said 21 groups across 12 countries have taken action at 18 airports so far.

The group issued a statement from Phoebe Plummer, 22, who was one of the two suspects arrested at Heathrow. She said: “People around the world are rising up to demand an end to oil by 2030. “This is an international problem, so ordinary people are doing what our politicians will not, working together globally to put a stop to the harm and suffering that fossil fuels cause.” Jane Touil, 58, who was the other person arrested, said: “Ordinary people have to stand up and make their governments do the right thing, because without pressure from us, they won’t. “I feel so angry and betrayed that politicians have let this happen when they’ve known about climate breakdown for over 50 years.”

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JUST STOP OIL



Phoebe Plummer and Jane Touil imprisoned

Court & Prison, Press / July 31, 2024

Two Just Stop Oil supporters have been imprisoned after painting Heathrow airport yesterday. Just Stop Oil is working with groups internationally to demand governments establish a fossil fuel treaty, to end the extraction and burning of oil, gas and coal by 2030. [1]

Phoebe Plummer and Jane Touil appeared before Judge Neeta Minhasat at Westminster magistrates court this afternoon, after taking action at Terminal 5, Heathrow Airport yesterday. They have been remanded to HMP Bronzefield until August 28th at Isleworth Crown Court, where they will appear for a case management hearing.

Yesterday, the pair used fire extinguishers to spray water-based paint at the departure boards in the terminal. The Crown is alleging £50,000 worth of damages.

During today's hearing Phoebe said to the judge:

"Sending peaceful protestors like me to prison isn't going to prevent us from resisting. You're upholding an abysmal system. And you're doing that to maintain business as usual. You won't be protected from the climate emergency."

Speaking before the hearing Jane Touil said:

person was to take direct action to highlight the catastrophic situation we're in, I became a Just Stop Oil supporter."

"I was arrested for the first time in April 2022 and have been arrested several times since. I spent a short time on remand in prison after climbing an M25 gantry in November 2022. I will continue to act on my conscience to protect life and to challenge the greed, corruption and cowardice that are killing people right now. I refuse to die for fossil fuels."

Phoebe Plummer took action yesterday after being found guilty of property damage last week, in regards to throwing soup at Van Gogh's Sunflowers in 2022. She had been advised to expect prison for this action at sentencing in September. [2]

As long as political leaders fail to take swift and decisive action to protect our communities from the worst effects of climate breakdown, Just Stop Oil supporters, working with other groups internationally, will take the proportionate action necessary to generate much needed political pressure. This summer, areas of key importance to the fossil fuel economy will be declared sites of civil resistance around the world. Are you in?

Sign up to take action at juststopoil.org.

ENDS

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Just Stop Oil eco-clowns play dead as they are arrested for spraying Heathrow Airport with orange paint as part of 'summer chaos' crusade - forcing FIVE officers to drag their slumped bodies out of departures

- **YESTERDAY -** JSO activists are arrested for blocking Gatwick departure gate

By MARK DUELL
PUBLISHED: 08:57, 30 July 2024 | **UPDATED:** 11:04, 30 July 2024

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Just Stop Oil eco warriors held a sit-down protest at London **Heathrow** Airport today, then played dead as they were dragged away by police.

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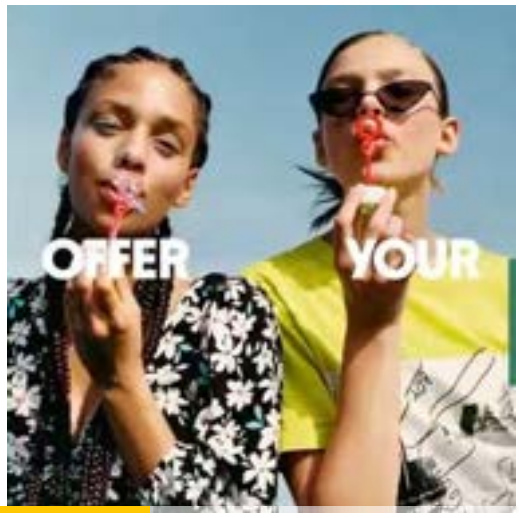


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But their protest fell flat and failed to cause any disruption to holidaymakers passing through the airport at the start of the summer holidays.

AD



The protest began at 8.35am before a team of police officers arrived to arrest the duo before hauling them away and into a police van by 8.50am. Heathrow officials later confirmed the airport 'continues to operate as normal'.

One of the activists today was Phoebe Plummer, who last week was **found guilty of criminal damage** after throwing soup over Vincent van Gogh's painting Sunflowers.

The 22-year-old will be sentenced on September 27 over the incident at the National Gallery in **London** in October 2022 and has been warned by a judge to expect jail.

The second activist, Jane Touil, 58, shouted while sat down today: 'Refuse to die for **fossil fuels**. We have seen the hottest two days in recorded history. Last year was the hottest year in recorded history.'

The **Metropolitan Police** said two people were arrested on suspicion of criminal damage, and officers remained at the scene to 'deal with any further offences'.

Yesterday, furious families stepped over seven Just Stop Oil activists who entered **Gatwick**'s South Terminal at about 8am and 'used suitcases with lock-on devices to block the departure gates'.



1 of 3) Just Stop Oil protesters Phoebe Plummer (left), 22, and Jane Touil (right), 58, walked into London Heathrow Airport Terminal 5 today, spraying orange paint on the floor and walls


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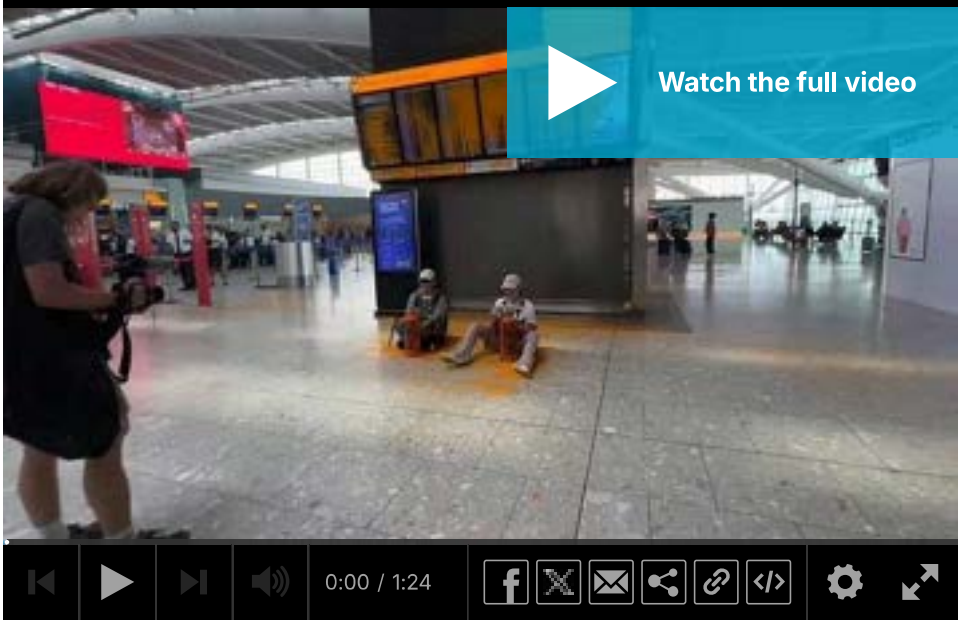


2 of 3) The activists then sprayed orange paint on departure boards at Heathrow Airport today



3 of 3) Just Stop Oil activists Phoebe Plummer (left) and Jane Touil (right) then sat on the floor

Travellers fume as JSO activists spray paint airport terminal



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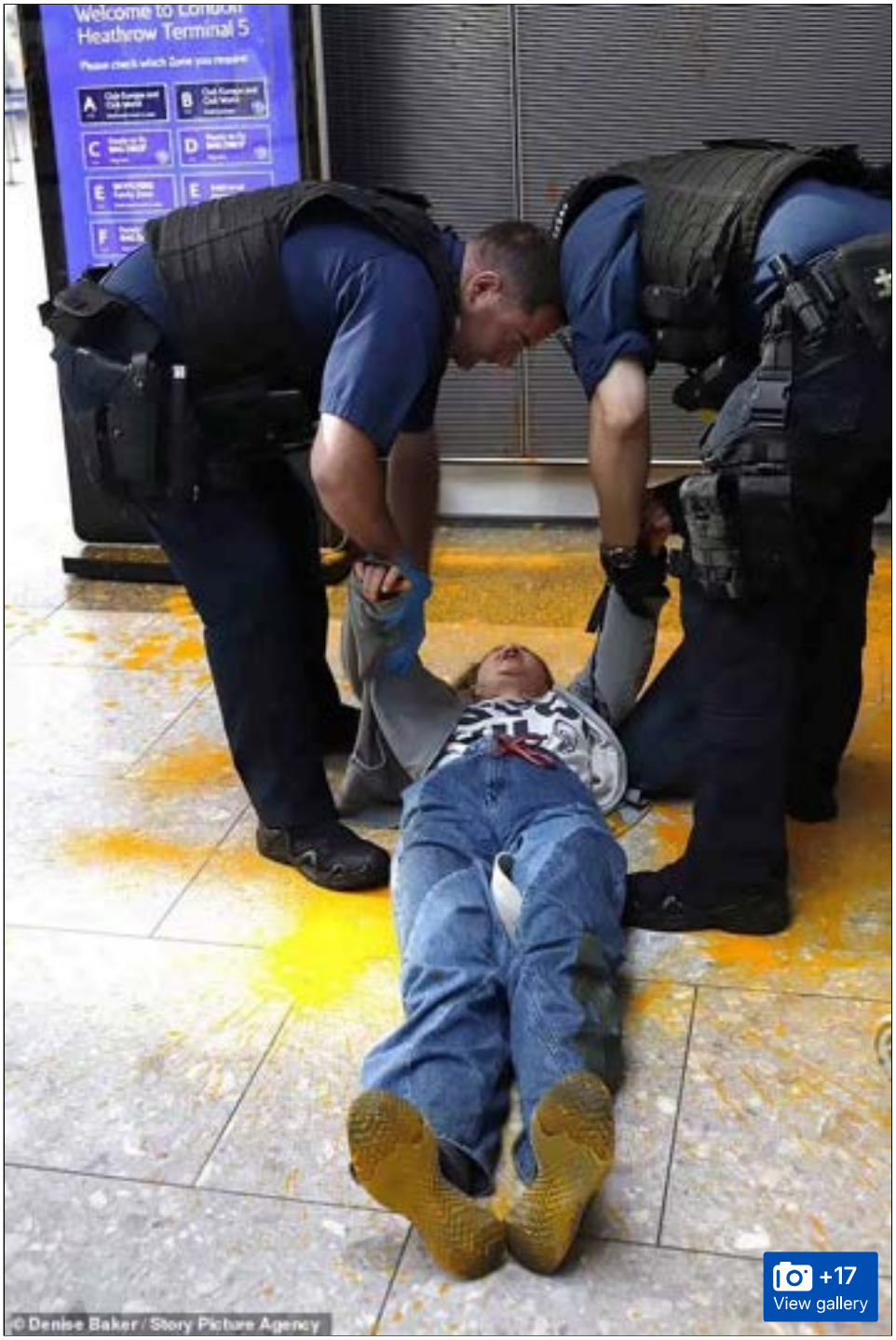
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Phoebe Plummer (left) and Jane Touil (right) sit on the floor this morning at Heathrow Airport



Just Stop Oil activist Phoebe Plummer is arrested by police at London Heathrow Airport today


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Police officers take away Just Stop Oil activist Phoebe Plummer today at Heathrow Airport

The protesters then sat on the floor inside the airport, blocking an entrance – but passengers with suitcases stepped over them to continue with their journeys.

Sussex Police said eight people were arrested on suspicion of interfering with public infrastructure, and a 'heightened

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quoted Plummer as saying: 'People around the world are rising up to demand an end to oil by 2030.

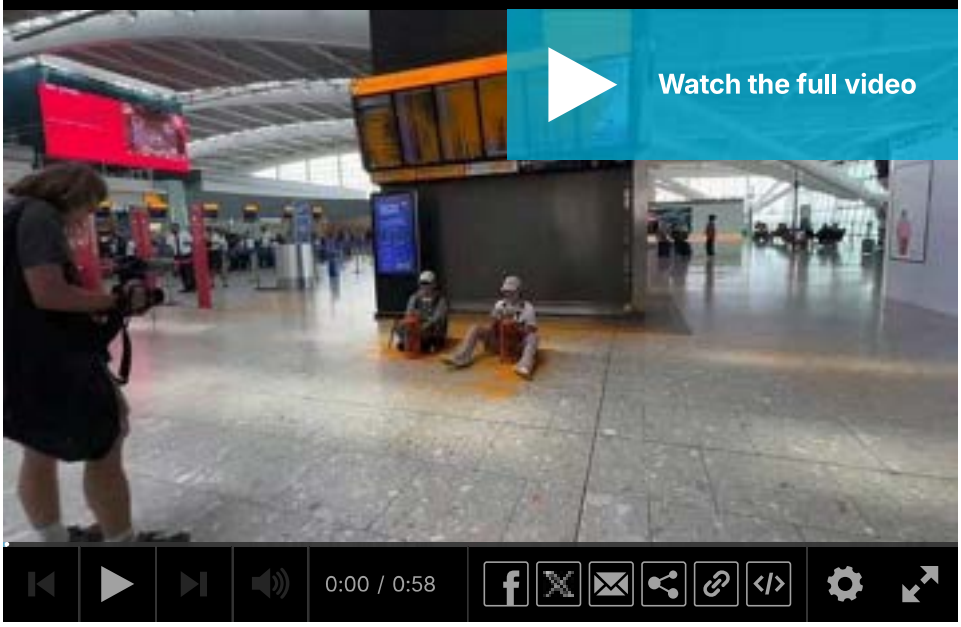
'This is an international problem, so ordinary people are doing what our politicians will not, working together globally to put a stop to the harm and suffering that fossil fuels cause.'

'Repression and prison time will not stop people stepping up to defend our families and communities. We have to put a stop to oil and gas. We've had fires raging in Jasper (national park in Canada).

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JSO eco-morons strike Heathrow as part of 'summer chaos crusade'



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Five Just Stop Oil activists remanded in prison in connection with plot to disrupt passengers at Manchester Airport

Five Just Stop Oil supporters have been remanded to prison after being arrested near Manchester Airport earlier this week.

Daniel Knorr, 22, Margaret Reid, 53, Ella Ward, 21, Noah Crane, 19, and Indigo Rumbelow, 30, were arrested on Monday in connection with a plot to disrupt passengers at Manchester Airport.

They were found to be in possession of items that Greater Manchester Police believed would have been used to 'cause damage and significant disruption to the airport and its operations', the force said.

The quintet today appeared at Manchester Magistrates' Court charged with intentionally or recklessly causing public nuisance.

The five protesters were all remanded until at least their next appearance on September 10.



(Left to right) Indigo Rumbelow, 30, Margaret Reid, 53, Ella Ward, 21, Noah Crane, 19, and Daniel Knorr, 22, were arrested on Monday near Manchester Airport



Noah Crane, 18, was also arrested later in the day from an address in Birmingham



Four Just Stop Oil protesters have been arrested near Manchester Airport (pictured) in a police swoop

Ella, Daniel, Indigo and Margaret were all arrested in the early hours of yesterday morning near Manchester Airport, Just Stop Oil said.

Noah was arrested later in the day from an address in Birmingham, after police seized a phone he allegedly purchased on August 3, the group added.

Activists from the environmental group have seen their attempts in recent weeks to unleash a 'summer of chaos' at airports across Europe foiled by officers.

They have been targeting airports in recent weeks in the campaign named 'Oil Kills'. Just Stop Oil said 21 groups across 12 countries have taken action at 21 airports so far.

Speaking before her imprisonment Indigo Rumbelow, 30, from Swansea, said: 'Just Stop Oil supporters have been taking part in an International Uprising for a Fossil Fuel Treaty, because we have an international crisis and we need an international solution. We're in a dangerously hot world and our leaders are hell-bent on making it worse.'

'The climate crisis threatens everything we know and love, yet our so-called leaders are continuing to make the problem worse, the courts are protecting fossil fuel profits and imprisoning those who stand-up to make change, whilst the media is still grappling to tell the truth.



AUGUST 1: Just Stop Oil protesters block the security screening area at Heathrow Terminal Five



AUGUST 1: Just Stop Oil protesters block the security screening area at Heathrow Terminal Five



AUGUST 1: Police officers remove a Just Stop Oil protester at London Heathrow Airport



AUGUST 1: Just Stop Oil protesters hold 'Oil Kills' signs as they block the security gates



AUGUST 1: Police officers remove a Just Stop Oil protester at London Heathrow Airport

'Many of my friends have been sent to prison, but we will not be deterred. Nothing will stop us trying to protect our families and our communities from the danger imposed on all of us through continued oil, gas and coal burning.'

Daniel Knorr, 22, from Oxford said: 'We were not born to stand-by and do nothing whilst hundreds of millions of lives are thrown into the furnace.

'To be human is to care. This is terrifying but we need to be brave. Courage is not the absence of fear, it is to drive forwards towards what's right, despite your fear.'

'We stand to lose everything if our government continues to fuel the climate crisis. It would be completely self defeating to not be in resistance at this time in history.

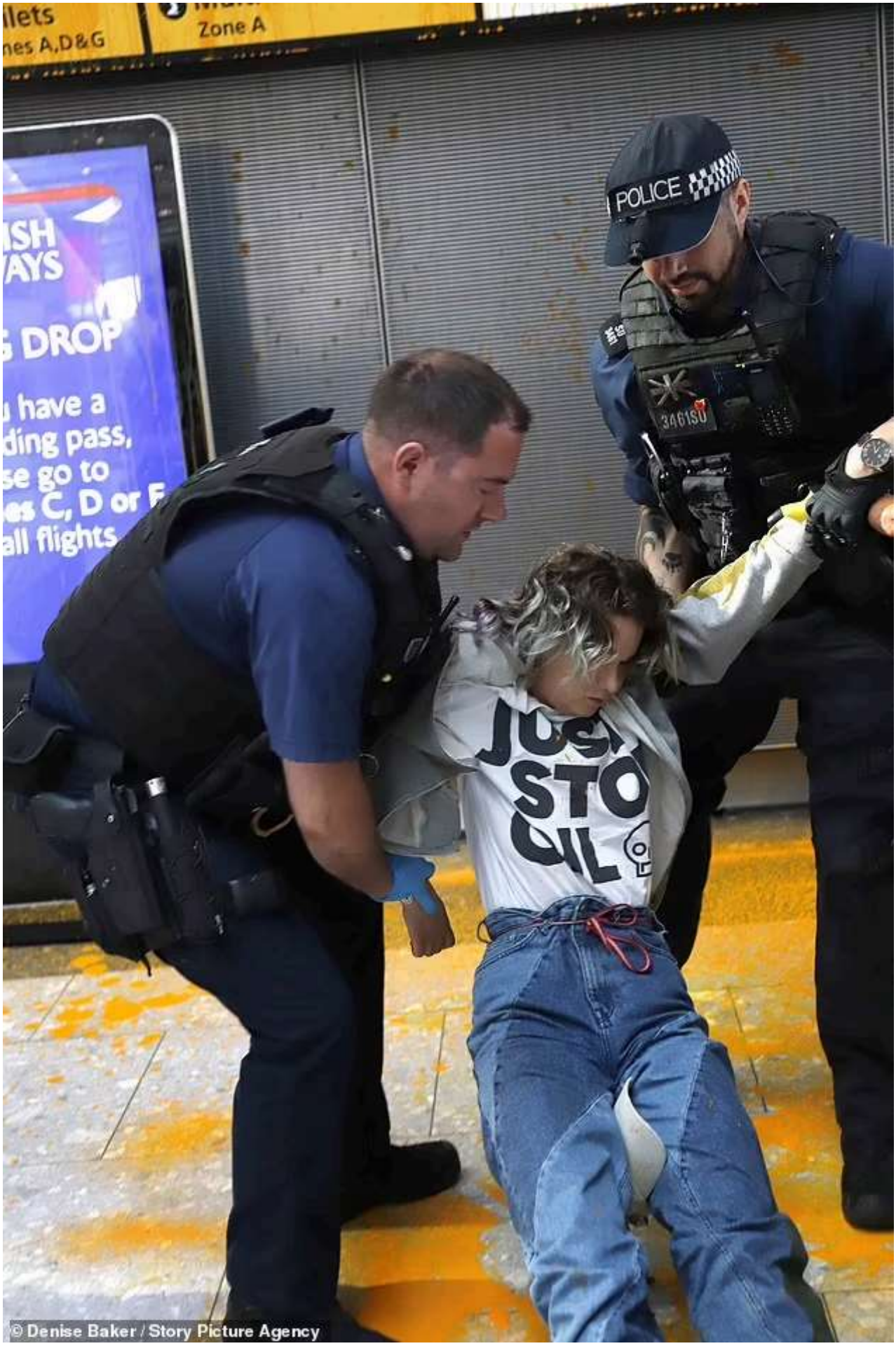
'Our leaders must enact a Fossil Fuel Treaty to phase down oil and gas if we are to stand any hope.'

Noah Crane, 19, from Norwich said: 'When I think about the situation we're in, I realise we are faced with a choice; we can either sit back and watch as governments allow the deaths of hundreds of millions of people to protect profit, or we can do everything in our power to prevent that. When I think about it that way, it's really a no-brainer.'

'I'm not scared of going to prison. What I am scared of is what will happen if we don't act on this crisis. The world is in a position where there is no threat they can make towards me, that outweighs the consequences of inaction.'



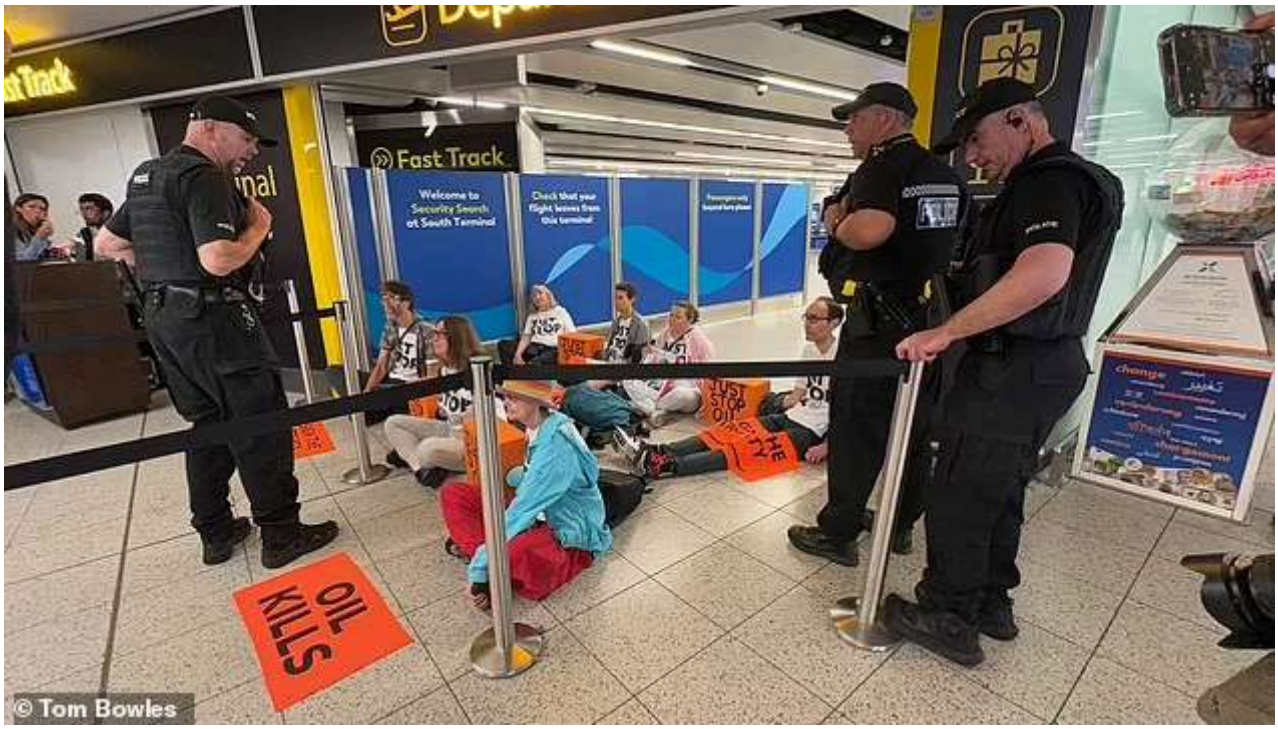
JULY 30: Phoebe Plummer, 22, and Jane Touil, 58, spray orange paint on departure boards at Heathrow's Terminal Five in another protest at the airport



JULY 30: Phoebe Plummer is arrested on suspicion of criminal damage at Heathrow Airport



JULY 30: Phoebe Plummer is removed by police at Heathrow after the group's latest stunt



JULY 29: Just Stop Oil supporters block departure gates at Gatwick Airport in another protest



JULY 29: The seven Just Stop Oil protesters at Gatwick earlier this week were arrested

A Just Stop Oil spokesperson said: 'In the wake of the four hottest days in recorded history during the past two weeks, governments are still failing to take action that is commensurate with the scale of the crisis humanity faces.

'Meanwhile, those demanding our leaders take necessary action, are being given increasingly draconian sentences by those in the judiciary who are complicit with the crimes against humanity, being perpetrated by governments and corporations.

'It's time world leaders stood up to fossil capital and enact a fossil fuel treaty to Just Stop Oil by 2030.'

Last week, a group of six demonstrators tried to block the security screening zone at London Heathrow's Terminal Five.

They sat or stood holding signs saying 'oil kills' and 'sign the treaty' in front of the barriers to enter the area for departing passengers - but they were dragged away by police officers.



Heathrow paint spraying trial ends with a hung jury

Court & Prison, Press / January 16, 2025

Two Just Stop Oil Supporters who sprayed Heathrow departure boards with orange paint during the Oil Kills, international uprising to end fossil fuels last July have won a temporary reprieve as their jury failed to reach a majority decision. [1]

Phoebe Plummer and Jane Touil were appearing before Her Honour Judge Duncan at Isleworth Crown Court accused of criminal damage over £5,000 for their action on 30 July 2024 to demand a fossil fuel treaty to end oil and gas by 2030. The trial, which lasted nine days, ended when the jury failed to reach a majority decision. The Judge has scheduled a retrial for May 2026. [2]

Phoebe was remanded for 58 days and Jane for 14 days following the action in which the pair used fire extinguishers to spray water-based paint at the departure boards in the terminal. The Crown alleged that the action caused £8,000 worth of damages. [3]

Phoebe is currently serving a two year prison sentence for criminal damage for throwing soup on a Van Gogh painting in October 2022. She was sentenced by Judge Hehir at South Crown Court on 27th September 2024, a sentence that is now being challenged in an appeal scheduled for 29th January 2025. [4]

During the trial, Judge Duncan ruled out the defence of necessity, saying this did not extend to civil disobedience and what she called the defendants' "honestly held opinions" about climate change.

Jane Touil responded that:

"It is not accurate to say that I am acting on my beliefs. It [the climate crisis] is not 'a cause'. This is physics, an objective reality. I can see that everything is at risk. We only do the right thing if we know what's going on."

Phoebe was not allowed to be present in court to make their closing speech as during the course of the trial, the heating system in the holding cells at Isleworth Crown court, contracted to the private company Serco broke down and no one currently in custody could be produced in court.

A Just Stop Oil supporter who was present throughout the trial said that:

"Phoebe and Jane had all their substantial defences removed, a severely mismanaged prosecution, logistical nightmares and a jury that was told to completely disregard their motivations. This is absolutely huge!"

In their closing speech Phoebe Plummer said:

"I have struggled with not being able to talk about the climate crisis- hearing it being called irrelevant feels inhumane and dishonest. The prosecution says I'm 'committed to breaking the law'; my only commitment is to act in line with my conscience. They say 'I do what I like without thinking about the law'. I don't think following the law and doing the right thing are always the same thing.

I cannot be a bystander to suffering where I see it. Nonviolence means being honest and living in line with the truth. I need to tell the truth about what I see. I act in a way that I think will be effective in saving life. When a doctor breaks a rib while doing CPR the doctor's intent is still obviously saving life not causing grievous bodily harm, the context always matters."

Just Stop Oil will be stepping into action again in 2025. To join a talk or sign up for action, register at juststopoil.org.

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Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

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

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Protesters block airport over expansion plans



Campaigners say private jets are up to 30 times more polluting than passenger planes

2 February 2025

Residents and activists have blocked access to an airport in protest over expansion plans.

Farnborough Airport, in Hampshire, has submitted plans to up its annual flight limit from 50,000 to 70,000 planes.

Campaigners from Extinction Rebellion, Farnborough Noise, Blackwater Valley Friends of the Earth and Alton Climate Action Network, as well as local

residents, blockaded the main entrance on Sunday, holding banners and releasing coloured smoke flares.

Rushmoor Borough Council has yet to make a decision on the proposed increase in flights.

The protest followed a consultation period on Farnborough Airport's expansion plans, which ended on 18 October.

The proposals have seen opposition from local residents and environmental campaigners.



Local residents joined climate activists to block the airport's main entrance

The plans include increasing the airport's annual weekend flight limit from 8,900 to 18,900 flights and upping its annual flight limit from 50,000 to 70,000.

In a statement, Extinction Rebellion said the 33,120 private jet flights to and from the airport in 2024 carried an average of 2.5 passengers, with each passenger responsible for the emission of nine times as much carbon as an economy flight to the US and 20 times that to Spain.

"For the limited benefit it provides to a small number of people, private aviation has a disproportionately large impact on climate change due to its high carbon emissions," it said.



Protesters are calling for a total ban on private jets

Steve Williams, environment lead for Waverley Borough Council, said: "Aviation has no realistic prospect of becoming sustainable in the near future, so any form of airport expansion is unacceptable, given the climate crisis."

Chris Neil, from Shackleford, Surrey, said it was "unacceptable that a tiny number of very wealthy people award themselves the right to fly in private jets, emitting huge amounts of carbon".

The government has announced plans to boost UK economic growth through airport expansion and the use of sustainable air fuel.

In January, Chancellor Rachel Reeves backed a **third runway at Heathrow** as part of a fresh plan to get the UK economy growing.

She has also backed expansions at Luton and Gatwick airports.



Protesters are calling for a total ban on private jets

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Activists hold demonstration at Scots airport over private jet company

Billionaire Anders Povlsen's firm targeted over environmental hypocrisy



Activists at Inverness Airport on Saturday (Image: XR Scotland)

Extinction Rebellion Scotland held a demonstration at Inverness Airport on Saturday, calling out Blackbird Air's chief executive Anders Povlsen, who protesters say uses private jets frequently, while making commitments to nature conservation.

Protesters waved banners emblazoned with "Ban Private Jets", "Blackbird Nae mAir" and "We're in a climate emergency, we need to step up and take action".

They called upon Povlsen to shut down Blackbird Air and instead invest in environmentally-friendly transportation.

The protesters joined fellow activists from Scientist Rebellion in Denmark, who staged a similar demonstration at Blackbird headquarters at Billund Airport.

Povlsen - Scotland's richest person - owns a vast amount of land in Scotland and also operates Wildland, a private enterprise which aims to act upon the climate crisis.

Sarah Birkby, from Extinction Rebellion Highlands and Islands and Moray, said: "It is completely contradictory to state the importance of acting on the climate emergency and at the same time run a private jet company.

“The time when people, no matter how rich, could say one thing and do the exact opposite is over.

“As Wildland itself declares, we need people to step up and take action.”

Anthony Graham, from Scientists for Extinction Rebellion, added: “The evidence is clear: our current emissions pathway is incompatible with a safe planet.

“Every tonne of CO2 fuels climate change, yet private jets - used by the wealthiest 0.003% - emit disproportionate amounts, worsening both the climate crisis and inequality.

“Scientists for Extinction Rebellion urge action on luxury emissions, stressing that those with the most power must lead by example.”

Inverness Airport is operated by Highland and Islands Airports.

A spokesperson said: “Police were in attendance and there was no impact on passengers.

“Operations at Inverness Airport continue as normal.”

Blackbird Air was approached for comment.

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News

Four Just Stop Oil protesters found guilty of conspiracy to cause disruption at Manchester Airport

"Their plan displayed a clear disregard for members of the public."



Emily Sergeant - 24th February 2025



Four Just Stop Oil protesters have been found guilty of conspiracy to intentionally cause public nuisance at Manchester Airport.

Indigo Rumbelow, Leanorah Ward, Margaret Reid, and Daniel Knorr each appeared at Manchester Minshull Crown Court last Friday (21 February) where they were found guilty after being arrested by officers from **Greater Manchester Police**'s (GMP) Specialist Operations Branch and Serious Crime Division **during the early hours of the morning last August.**


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Man sleeps as ship runs aground next to...


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The four defendants were detained while walking along South Park Road in Gatley, as they were making their way to **Manchester Airport**.

According to GMP, they were equipped with heavy duty bolt cutters, angle grinders, glue, sand, Just Stop Oil high visibility vests, and a leaflet containing instructions to follow when interacting with police.

One of the defendants, Leanorah Ward, was also found in possession of a handwritten detailing the motive of the group – which was to enter the airfield of Manchester Airport, before contacting the **police** to alert them of their activity.

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They were planning to stick themselves to the airfield taxiway using the glue and sand, with one main goal – to disrupt airport activity and gain media attention.

GMP says the arrests managed to 'prevent large-scale disruption' at Manchester Airport, amid a summer of chaos threatened by Just Stop Oil, a result of extensive work and national coordination.

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"This was a planned and targeted attack against one of the country's busiest airports which could have caused significant disruption," explained Natalie Mackenzie, who is the District Crown Prosecutor for CPS North West.

"Their plan displayed a clear disregard for members of the public using the airport at the height of summer.

Read more:

- **Police arrest four Just Stop Oil protesters near Manchester Airport**
- **Sneak peak inside Manchester Airport's brand new terminal following £1.3bn transformation**
- **Council tax could be increased to help keep Greater Manchester Police 'one of the best' in the UK**

"The right to protest is important but it must be balanced against the rights of other citizens to go about their daily business."

Featured Image – Just Stop Oil

JSO co-founder's sentence reduced by appeal court



PA MEDIA

Lucia Whittaker De Abreu, Cressida Gethin, Louise Lancaster, Daniel Shaw and Roger Hallam had their sentences reduced

Dominic Casciani >
Home and Legal Correspondent
@BBCDomC >

Jess Warren
BBC News

7 March 2025

Six climate change activists, including the co-founder of Just Stop Oil (JSO), have had their sentences reduced after organising what they hoped would be a massive blockade of the M25, the Court of Appeal has ruled.

Roger Hallam and 15 other protesters were jailed last year for their roles in four demonstrations held by JSO, including climbing on gantries over the M25 and throwing soup over Vincent van Gogh's Sunflowers painting, between August and November 2022.

They challenged their sentences at the Court of Appeal, with their lawyers claiming they were "manifestly excessive".

The judges dismissed appeals by two women who threw the soup in the National Gallery in London in October 2022.

In their judgment, the Lady Chief Justice Baroness Carr, Mr Justice Lavender and Mr Justice Griffiths ruled that six of the 16 should have their sentences reduced while dismissing the other appeals.

Just Stop Oil: What is it and what are its goals?

The Court of Appeal said that the judge who sentenced Hallam and others convicted of conspiracy had not taken into account their conscientious motivation when he had assessed their "culpability" – a formal part of the sentencing calculation.

"Some attention must be paid to conscientious motivation, although much less than would have been the case had the offending been less disproportionate," said Baroness Sue Carr, the Lady Chief Justice.

During the hearing on Friday, several campaigners stood up and turned their backs on the judges while wearing white T-shirts with the words "Corruption in Court".



PA MEDIA

Campaigners turned their backs on the judges while wearing T-shirts with the words "Corruption in Court"

Hallam was originally jailed for five years for agreeing to disrupt traffic by having protesters climb onto gantries over the M25. His sentence was reduced to four years.

The M25 demonstrations took place over four successive days, from 7 to 10 November 2022, with impacted locations including, junction two in Dartford, junction six to seven in Godstone, junction eight to nine in Reigate, junction 13-14 in Staines, junction 21a-22 in Watford, junction 25 in Cheshunt and junction 27 in Epping.

Daniel Shaw, Louise Lancaster, Lucia Whittaker De Abreu, and Cressida Gethin originally received four-year jail terms for their involvement in the same protest.

Shaw's and Lancaster's sentences were reduced to three years, while Whittaker De Abreu's and Gethin's sentences were reduced to 30 months.

Gaie Delap, who climbed an M25 gantry at the age of 75, was previously jailed for 20 months.

She was told her sentence would be reduced to 18 months because the judge had not taken into account the onerous bail conditions she had faced while awaiting trial.

Last year, she was briefly returned to jail, having been released on licence, because the authorities could not find a monitoring tag small enough to fit her.



PA MEDIA

The M25 protests led to around 50,000 hours of delays and cost the Metropolitan Police more than £1.1m

Ten other protesters had their sentences upheld.

These included Phoebe Plummer and Anna Holland, who threw soup over Van Gogh's Sunflowers at the National Gallery in London, in October 2022. They saw no change in their sentences of two years and 20 months, respectively.

Baroness Carr said: "We do not consider that Ms Plummer's sentence of 24 months' imprisonment was manifestly excessive or wrong in principle. Damage caused to heritage and or cultural assets was an aggravating factor."

Her sentence for criminal damage had been "well within the range" of available terms to the judge, who had to consider the minimum period to act as an appropriate punishment.

Ms Holland's sentence had been correctly slightly shorter, said the Lady Chief Justice and two other senior judges, because she had given up taking part in such JSO protests.

The Court of Appeal also threw out the challenges of George Simonson, Theresa Higginson, Paul Bell and Paul Sousek for their roles in the M25 protests.

Larch Maxey, Chris Bennett, Samuel Johnson and Joe Howlett, who were jailed after occupying tunnels dug under the road leading to the Navigator Oil Terminal in Thurrock, Essex, also had their appeals dismissed.

Raj Chada, who represented Hallam and other protesters, said: "No country in Europe gives such draconian sentences for peaceful protests, proving we are out of kilter with the rest of the civilised world.

"We are reviewing the judgment and considering an appeal to the Supreme Court."

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Heathrow Airport 10 : 8 found guilty, 1 acquitted after Judge removed all legal defences

Court & Prison, Press / March 20, 2025

Eight Just Stop Oil supporters were found guilty of conspiracy to cause a public nuisance at Heathrow by a jury at Isleworth Crown Court today, while 1 other supporter was acquitted. [1]

The Heathrow 10 were arrested on 24 July 2024, on the first day of the Oil Kills International Uprising to end fossil fuels. Nine defendants have been on trial since January 27th before Judge Duncan. One, Rory Wilson (26), pleaded guilty last September. [2][3]

Yesterday, Julia Mercer (74) , who was arrested leaving a house in Wraysbury, where she had volunteered to cook meals for the group, was acquitted unanimously by the jury.

Today eight Just Stop Oil supporters: Sally Davidson (37), Adam Beard (55), Luke Elson (31), Luke Watson (34), Sean O'Callaghan (29), Hannah Schafer (60), William Goldring (27) and Rosa Hicks (28) were found guilty by majority verdict.

Sentencing was adjourned until 16th May. Luke Elson, Luke Watson and Rory Wilson are to remain in prison, where they have been held since 24 July 2024. William Goldring was also remanded ahead of sentencing. The remaining five were granted bail.



Luke Elson



Luke Watson



Rory Wilson

Sean O'Callaghan, Sally Davidson, Hannah Schafer, Julia Mercer and William Goldring were all granted bail in the weeks after the action last July. Rosa Hicks, was bailed in January after 6 months on remand because of a heating failure in the female court cells and Adam Beard was released in February, but Rory Wilson, Luke Elson and Luke Watson remained in prison serving something close to a 2 year prison sentence without having been convicted of anything.

The trial was adjourned in January due to Ministry of Justice rules limiting court sitting days as a cost saving measure, only to be reinstated on January 24th giving the defendants just half a working day to reorganise.[4]

During the trial the judge removed all legal defences from the jury's consideration, ruled the climate emergency to be 'irrelevant' and forbade defendants from mentioning that a jury has a right to acquit a defendant as a matter of conscience. The defendants were not permitted to bring expert witnesses on international law or climate science or to show the jury videos they recorded of themselves speaking before the action, nor were they allowed to read the quotes from news articles about their arrests and subsequent remand to prison.

The prosecution argued that between 1st March and 24 July 2024 the nine defendants had, along with Rory Wilson, planned an action which involved some of them entering Heathrow airport and gluing themselves to runways or taxiways in order to cause maximum disruption.

During the seven week trial, expert witnesses including a retired pilot, members of Heathrow Operations team and the Met Police Protest Removal Team presented their hypothetical scenarios of what might have happened had the defendants entered the airfield. Scenarios ranged from people being sucked into aircraft engines, vulnerable plane passengers being stranded in disabled aircraft with no access to air conditioning, planes being diverted to far flung locations or forced to make emergency landings in unsuitable locations. None of which actually happened.

The defendants argued that their intention was not to cause disruption, indeed none thought that they would make it to the perimeter fence, let alone cut a hole and go airside. Their plan was to use the publicity surrounding their arrests at Heathrow in order to get good information to the public about the scale and

danger of the climate crisis. Evidence for the defence included the prepared statements they had carried with them to the action, which outlined their justification for the action and the steps they would take to minimise harm. This included their commitment to remain clear of the runways and to wait until a 999 call had been made before entering the airport perimeter.



Sally Davidson
Credit Crispin Hughes



William Goldring
Credit Crispin Hughes



Hannah Schafer
Credit Crispin Hughes



Julia Mercer
Credit Crispin Hughes



Sean O'Callaghan
Credit Crispin Hughes



Rosa Hicks
Credit Crispin Hughes

Despite repeated interruptions from the Judge, Sally Davidson, 37, a hairdresser from Portland, Dorset spoke at length about the climate crisis and said that although evidence had been included in the agreed facts of the case, facts could not convey the emotional force of the losses people are experiencing. She said: *"if you hear about the father who watched his wife and baby being swept off their car roof while trying to escape the floods last summer in Valencia, your emotional response to this is valid. It is what makes you human."*

Luke Elson, 31, a support worker from East London told the court that he felt compelled to take action because he knew one day his young nieces would ask him, *"Uncle what did you do when you knew this was happening?" and he said – "I want to be able to look them in the eye and say that I did everything I could".*

In her closing statement Julia Mercer, 74 from Todmorden in Yorkshire referred to her time at Greenham Common Women's Peace Camp saying: *"Back in those Greenham days, peaceful protestors were treated differently by the law. And what's happening now is that the law is becoming increasingly punitive with police raids and arrests; long periods for people in prison on remand before trial. It's not right. It doesn't*

serve the public to silence and jail those sounding the alarm. It's only serving the interests of the arms dealers and oil barons. We have a long and honourable tradition of peaceful protest in the UK."

In his closing statement Sean O'Callaghan, 30, an Environmental educator, from Dorking, Surrey referred to the Police, Crime, Sentencing and Courts Act and said: *"Let's not forget these anti-protest laws can be traced back to fossil fuel lobbyists. The repression being applied to peaceful activists since these laws came in, is a desperate attempt by powerful corporations to prevent the horrifying truth of decades of deception being revealed to the general public. If the fossil fuel companies had been held to account for their lies, we wouldn't need to be doing this. If the Government had done its job to protect us, we wouldn't need to be doing this. Who are the democrats in this situation? Those trying to conceal the truth, or those trying desperately to reveal it?"*

In his closing statement Adam Beard, 55, a gardener from Stroud, Gloucestershire said:: *"While the climate crisis was central to why I took the action, it has been ruled irrelevant to this case... I don't have huge resources behind me but I do have my body, and sacrificing my freedom through civil resistance to get a message of truth into the media is within my power. This is what it was all about. So our action did not fail as the prosecution has claimed, it was a success. This was achieved because we were arrested at a high-profile location and then remanded into custody, with all the press attention that that brought. And all this coverage was about our message and information for the public, not about delayed flights."*

Following the verdict the defendants issued the following statement:

"We thank the jury for their service and accept their decision. We recognise the constraints they were under given that the judge removed all legal defences, ruled the climate emergency to be 'irrelevant', and forbade us from mentioning that a jury has a right to acquit a defendant as a matter of conscience.

Some of us now face many months in prison for planning an action that never happened. We sought to get media attention so that we could explain the growing suffering and the horror of our heating world and the urgency for global action. In that we count ourselves successful. A small victory won in the wider struggle against complacency, false hope and denial.

We have no regrets. We planned our campaign with care, aiming to avoid harm and with the intention of preventing greater harm. The bigger crime would have been not to act.

When it comes to global heating there are no winners. Governments are rolling the dice on billions of deaths and economic collapse as extreme heat, crop failure and starvation drive mass migration and civil unrest. Our government is failing to protect us and the courts and the judiciary are complicit. They are protecting those who profit from death and destruction while criminalising those standing up against it.

Civil resistance to a morally bankrupt political class is not only necessary as an act of self-defence, it is also morally justified. There are many who know the horror of our situation, who nonetheless are carrying on with business as usual, in the mistaken belief that someone else will solve the problem. We are sorry to be the bearer of bad news, but if you don't stand up and do something, we are going to lose literally everything."

In 2024 Just Stop Oil successfully won its original demand of 'no new oil and gas'. Now the courts agree that new oil and gas is unlawful. Just Stop Oil supporters are on the right side of history and nonviolent civil resistance works. Just Stop Oil will once again be stepping into action this April to demand that governments work together to end the extraction and burning of oil, gas and coal by 2030. You can help make this happen by coming to a talk and signing up for action at juststopoil.org.

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Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

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

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

Website: https://juststopoil.org/

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

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

Twitter: https://twitter.com/JustStop_Oil

Youtube: https://juststopoil.org/youtube

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

Notes to Editors

[1] Just Stop Oil is committed to nonviolent direct action to resist the destruction of our communities as a result of climate breakdown. We do not consent to plans that will result in 3C of warming and mass death.

We demand an emergency plan to Just Stop Oil by 2030. Our government must work with other governments to end the extraction and burning of all oil, gas and coal by 2030.

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

Just Stop Oil 'Blue Lights' policy: our policy is, and has always been, to move out of the way for emergency vehicles with siren sounding and 'blue lights' on.

We take all possible steps to ensure that no-one's safety is compromised by our actions.

[2] Arrests: https://juststopoil.org/2024/07/24/just-stop-oil-supporters-arrested-as-international-uprising-begins/



Just Stop Oil is hanging up the hi vis

Press / March 27, 2025

Three years after bursting on the scene in a blaze of orange, at the end of April we will be hanging up the hi vis.

Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful.

So it is the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison. We have exposed the corruption at the heart of our legal system, which protects those causing death and destruction while prosecuting those seeking to minimize harm. Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK's oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen.

This is not the end of civil resistance. Governments everywhere are retreating from doing what is needed to protect us from the consequences of unchecked fossil fuel burning. As we head towards 2°C of global heating by the 2030s, the science is clear: billions of people will have to move or die and the global economy is going to collapse. This is unavoidable. We have been betrayed by a morally bankrupt political class.

As corporations and billionaires corrupt political systems across the world, we need a different approach. We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Nothing short of a revolution is going to protect us from the coming storms.

We are calling on everyone who wants to be a part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. Sign up here. See you on the streets.

ENDS

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Press email: juststopoilpress@protonmail.com

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Website: https://juststopoil.org/

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

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

Twitter: https://twitter.com/JustStop_Oil

Youtube: https://juststopoil.org/youtube

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

Notes to Editors

[1] Just Stop Oil is committed to nonviolent direct action to resist the destruction of our communities as a result of climate breakdown. We do not consent to plans that will result in 3C of warming and mass death.

We demand an emergency plan to Just Stop Oil by 2030. Our government must work with other governments to end the extraction and burning of all oil, gas and coal by 2030.

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

Just Stop Oil 'Blue Lights' policy: our policy is, and has always been, to move out of the way for emergency vehicles with siren sounding and 'blue lights' on.

We take all possible steps to ensure that no-one's safety is compromised by our actions.

[2] During our 3 year history Just Stop Oil supporters have been arrested 3,300 times and imprisoned 180 times, for having broken laws that were drafted by the fossil fuel industry. 7 people are now in prison serving sentences of up to 4 years and 8 are on remand. 16 Just Stop Oil supporters are due to be sentenced in the next few months.

Youth Demand supporters RAIDED by cops across UK as outrageous clampdown begins

Police repression has reached a new level after direct action group Youth Demand's welcome talk and a number of houses were raided last night and this morning. Nine people, including one attending their first meeting and a journalist were arrested.

Youth Demand: multiple raids across the UK

At around 7:30pm on Thursday 27 March, over 30 Met Police officers crashed into the Youth Demand Welcome Talk at the Quaker Meeting House in Westminster and arrested six people, including one attending their first ever welcome talk and a journalist.

Three people were released in the early hours of the morning but three remain in custody:

Police said that they were arresting people for conspiracy to cause a public nuisance.

In a separate incident at around 8:00am on Friday 28 March, Youth Demand supporter Eddie Whittingham was arrested at his house in Exeter, but has been released without charge. Three other supporters were arrested at another location:



Then, at around 12:30pm cops raided another Youth Demand supporter's home and arrested them.

The situation is ongoing:

The Welcome Talk is an opportunity to share information about Israel's ongoing genocide of the Palestinian people in Gaza and the West Bank and about the mass killing that is being imposed on

marginalised people across the globe as a result of the accelerating climate crisis. It is also an opportunity to share plans for nonviolent civil resistance actions to take place in April:

> *@youth.demand*
>
> *🚨SIX ARRESTED FOR SPEAKING THE TRUTH IN UNPRECEDENTED REPRESSION TO STOP US🚨 At 7:30pm yesterday, over 30 Metropolitan Police officers broke into a Welcome Talk at the Quaker Meeting House in Westminster and arrested six people, including one attending their ever event and a journalist. Police said that they were arresting people for conspiracy to cause a public nuisance. This is how we know the state is scared of us telling the truth. We will not be intimidated. Only sustained mass resistance can put an end to genocide. This April we are taking action every week: join us at the rally to kick it all off on Tues 1st April @ 6:30pm on Malet Street in front of Senate House Library*
>
> *♬ original sound – Youth Demand*

Outrageous and repressive

One of those arrested last night and released this morning was Ella Grace-Taylor, 20, an actor musician student who said:

> *At this point, it couldn't be clearer that we are in a police state. Our politicians will stand by as police engage in mass arrests and imprisonment of anyone who speaks out against the government for being responsible for genocide. By arming Israel and refusing to call what is happening a genocide, they are perpetrating mass slaughter. Hundreds of children were killed in Palestine in the last week.*
>
> *We won't stop saying it. We won't be intimidated.*

A Youth Demand spokesperson said:

> *It's clear that the government sees Youth Demand as a threat. They know that we are right. There are thousands of young people who are horrified by what the government is doing to facilitate genocide and who know that they have been betrayed as their future is fucked. We will not be silenced. Young people all over the country are coming together to shut London down day after day throughout April.*
>
> *We refuse to be ruled by liars, war criminals and arsonists. We will not let them get away with this. We refuse to be ignored. It's time for young people to take to the streets day after day and shut London down.*
>
> *Only sustained mass resistance can put an end to genocide. By standing together we can grind the murder machine to a standstill. It's time to disrupt. Join us every week in April, starting with a rally next Tuesday 1 April, at 6:30pm on Malet Street in front of Senate House Library.*

Then, there are more actions going on in London:

You can sign up for action at youthdemand.org

Featured image and additional images supplied

London Marathon disrupted as UK Youth Demand protesters storm Tower Bridge

Activists stormed the London landmark at 10:30am and threw bright pink powder across the road as the elite runners crossed the River Thames



The two supporters were seen wearing t-shirts that read 'Youth Demand: Stop Arming Israel'(Image: Peter Macdiarmid/LNP)

Protestors from UK Youth Demand have disrupted the London Marathon's elite men's race with a protest on the city's iconic Tower Bridge.

Activists stormed the London landmark at 10:30am and threw bright pink powder across the road as the elite runners crossed the River Thames. Pictures taken at the scene show protestors being tackled by stewards, and led away from the course.

Youth Demand said the pair were arrested.

The two supporters were seen wearing t-shirts that read 'Youth Demand: Stop Arming Israel.' City of London police quickly moved to arrest the two of them. Before taking action with fellow protester Cristy North, Willow Holland, 18, from Bristol, said: "I am taking action with Youth Demand because I have run out of other options: thousands are being killed in Gaza, our government is making no effort to stop it and no other course of action, marches or rallies, has worked.



UK Youth Demand disrupted the protest(Image: Peter Macdiarmid/LNP)

Article continues below

"I refuse to be complicit in a genocide funded by our politicians.

Profit should never be prioritised over basic decency, we're taking action for human lives and human rights. We don't want blood on our hands, we don't want to be forced into complicity with a genocide. We need more people in resistance, refusing to be complicit whilst upholding international law, now more than ever."

The vast numbers at today's London Marathon are expected to surpass the roughly 55,646 finishers of the New York Marathon in November, and will be accompanied by thousands more people cheering them on, with massive television coverage following the crowds through the city.

Article continues below



More than 56,000 people are expected to complete the 26.2 mile course(Image: Getty Images)

Live coverage of the race started at 8.30 this morning, and BBC One will carry the main race until around 2pm, when it will switch to BBC Two.

For the latest breaking news and stories from across the globe from the Daily Star, sign up for our newsletter by clicking here.



Heathrow Airport 9: Five supporters given jail terms of up to 15 months for an action that never happened

Court & Prison, Press / May 16, 2025

Five Just Stop Oil supporters were today given jail terms of up to 15 months, while the remaining four were given suspended sentences for an action at Heathrow Airport that never happened. The group planned action to demand a fossil fuel treaty to end the extraction and burning of oil, gas and coal by 2030. [1]

The nine supporters were arrested near Heathrow on 24 July 2024, the first day of the Oil Kills International Uprising to end fossil fuels and were convicted in March 2025 of conspiracy to cause a public nuisance. Since last July, the group has spent a combined total of 44 months in prison on remand. [2][3]

Today, at Isleworth Crown Court, Judge Duncan handed down a mix of prison and suspended sentences of between 11 and 15 months.

be released in view of time already served on remand. The remaining defendants Sally Davidson (37), Sean O'Callaghan (30), Hannah Schafer (61) and William Goldring (27) were each given suspended sentences of between 11 and 15 months, suspended for 2 years.

Luke Elson was further sentenced in the matter of the M25 gantry actions for which he was given a prison sentence of 15 months suspended for 2 years.

All defendants were ordered to pay costs of £2000, except Hannah Schaffer and Rory Wilson. All those with suspended sentences were also ordered to complete up to 180 hours of unpaid work in the community over the next 12 months.

The defendants issued the following statement:

"We are relieved to have avoided further incarceration, but it remains the case that we have all endured time in prison, some for many months for a nonviolent action that never happened. The UK is dangerously close to becoming an authoritarian regime in which human rights mean nothing and no dissent will be tolerated.

We planned our campaign with care, aiming to avoid harm and we remain convinced that to stand by and do nothing in the face of the incalculable harm that unchecked fossil fuels will bring would be the greater crime.

There's a reason that our judge removed all legal defences and ruled the climate emergency to be 'irrelevant' at our trial, and it has nothing to do with justice or morality. It has to do with the profits and political power of the fossil fuel companies and the billionaires that control them.

Fossil fuels are driving us toward 2°C of global heating in the 2030s and billions of deaths within decades. Our government is failing to protect us and the courts and the judiciary are complicit. Prosecuting those who peacefully resist is no solution. Faced with the true horror of our situation, many more people will step into civil resistance to protect themselves and those they love. If not, we are all going to lose everything."

At the sentencing hearing, the defendants argued amongst other things that the prosecution sought sentencing on the basis of facts that had not been evidenced in court, had omitted important information about the climate crisis which was relevant to their motivation and failed to mention that no-one has previously been jailed in this country for an agreement to take part in nonviolent direct action, where no actual damage or disruption has resulted.

Wildlife presenter Chris Packham wrote a letter to the court in support of the defendants in which he said [4]:

"As someone with a responsibility to communicate facts about science to the British public, I have been horrified to hear judges refer to the science of climate breakdown as 'a matter of political opinion or belief'. Treating uncontested, peer reviewed, established science as a matter of opinion or belief is a

Jonathon Porritt, CBE also wrote to the court saying [5]:

"Campaigners are increasingly frustrated that government policy and specific interventions do not reflect even the mainstream consensus of climate scientists, let alone the growing number of so-called 'outliers'.

"I've thought about these matters long and hard over the last 40 years. I completely understand why many more people today have come to see civil disobedience (and consequential acts of nonviolent direct action) as critical to 'shifting the needle', to ensuring that urgent and applied attention is now paid to what will otherwise become by far the most catastrophic crisis that humankind has ever faced."

During their trial in March 2025 the judge removed all legal defences from the jury's consideration, ruled the climate emergency to be 'irrelevant' and disallowed expert witnesses on international law or climate science. Five of the group have subsequently launched an appeal against the verdict after evidence emerged of serious misconduct by the jury. [6]

The Heathrow 9 took part on the first day of the Oil Kills International Uprising to end fossil fuels in which over 500 ordinary people from 22 different civil resistance groups and 14 countries across Europe, North America and Africa engaged in a campaign of civil resistance at international airports to demand a Fossil Fuel Treaty. Action takers glued themselves to tarmac, stood up in aeroplanes, glued and locked on at departure gates and held placards in airport terminals. There were 144 arrests at 31 different international airports.[7]

Commenting ahead of the sentencing, Tzeporah Berman, Chair, Fossil Fuel Non-Proliferation Treaty Initiative said:

"The citizens standing up to raise awareness of how fossil fuels are causing lethal heat waves, floods and droughts and threatening our children and our health are not criminals – history will remember them as heroes. Our laws have been distorted by the wealth and influence of the oil and gas companies that continue to call the shots to protect their obscene profits over the public good."

Inês Teles, a spokesperson for Stay Grounded said:

"While the aviation industry profits from fuelling climate breakdown, those who fight for our present and future face escalating repression. This is no coincidence: governments are complicit with climate criminals, backing projects that will drive emissions even higher—such as the multiple airport expansion plans across the UK. They will go to any length to defend the status quo, even if it means trampling on our basic rights."

Calum Macintyre, 32, from Folk Mot Fossilmakta, who also joined the campaign last summer said:

"I took action as part of the Oil Kills campaign last summer in Norway. We broke through the fence at Oslo airport and glued ourselves to the taxiway. Afterwards the police took our details and drove us to the train

"Compared to the treatment of our friends in the UK – many of whom have been sitting on remand since last summer – the difference could not be more stark. It is terrifying to see the erosion of people's civil liberties in the UK. But we know that locking people up to silence them will never work.

"For us in Norway the Just Stop Oil prisoners are a sign of strength, courage and commitment that inspires us to up our resistance against the fossil fuel elite that are driving us all towards a dystopian future. Along with everyone that took action with Just Stop Oil, they are a shining beacon of hope."

In 2024 Just Stop Oil successfully won its original demand of 'no new oil and gas' and on March 27th 2025 announced an end to the campaign of action. However, our supporters will continue to tell the truth in court, to speak out for our political prisoners and to help build what comes next.

During our 3 year history Just Stop Oil supporters have been arrested 3,300 times and imprisoned 180 times, for having broken laws that were drafted by the fossil fuel industry. After today's sentencing there will be seven people in prison as a result of taking action with Just Stop Oil.

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

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

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

Website: https://juststopoil.org/

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

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

Twitter: https://twitter.com/JustStop_Oil

Youtube: https://juststopoil.org/youtube

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

Notes to Editors

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

Four Just Stop Oil activists are jailed for plot to break into Manchester Airport with bolt-cutters and glue themselves to runaway

Four Just Stop Oil protesters have been jailed for plotting to break into Manchester Airport equipped with heavy-duty bolt cutters, angle grinders, glue and sand.

Indigo Rumbelow, 31, Daniel Knorr, 23, Leanorah Ward, 22, and Margaret Reid, 54, had all been convicted of conspiracy to intentionally cause a public nuisance.

They had planned to break into the airport in August last year and glue themselves to the taxiway.

Manchester Minshull Crown Court heard they were all arrested near to the airport.

They were carrying break-in gear, Just Stop Oil high visibility vests and a leaflet containing instructions to follow when interacting with police.

Ward was also found in possession of a handwritten note which detailed the motive of the group to enter the airfield and to then contact the police to alert them of their activity.

Following a trial the four defendants were found guilty in February of conspiracy to intentionally cause a public nuisance. A fifth defendant was acquitted.

Rumbelow, from London, was jailed for 30 months; Knorr, from Birmingham, was jailed for two years; Ward, also from Birmingham, was sentenced to 18 months in custody; and Reid, from Kendal, Cumbria was also locked up for 18 months.



Pictured left to right: Leanorah Ward, 22, Margaret Reid, 54, Indigo Rumbelow, 31, and Daniel Knorr, 23



The group were carrying heavy duty bolt cutters, angle grinders, glue and sand



Following a trial the four defendants were found guilty in February of conspiracy to intentionally cause a public nuisance

Each was also ordered to pay £2,000 in costs.

Detective Chief Inspector Tony Platten, who led the investigation, said: 'We know this disruption was deliberately planned to coincide with the height of the summer holidays, targeting the public and their families.

'It was vital that we prevented this from happening. People work hard for their time off, and we have a duty to ensure they can enjoy it without fear or disruption.

'The group's actions demonstrated a complete disregard for the impact on the lives of those travelling via Greater Manchester, and I welcome the sentences handed down today.'

Rad Taylor, from Manchester Airport, said: 'The safety and security of our passengers is always our number one concern.

'What these individuals were planning would not only have caused significant disruption for tens of thousands of passengers, but also a significant safety risk.

'The potential consequences of that do not bear thinking about.'

In statements released by Just Stop Oil after the sentencing, the defendants said the action was part of a campaign for a treaty to end the extraction and burning of oil, gas and coal by 2030.



In statements released by Just Stop Oil after the sentencing, the defendants said the action was part of a campaign for a treaty to end the extraction and burning of oil, gas and coal by 2030



The group had planned to break into the airport in August last year and glue themselves to the taxiway



They were carrying break-in gear, Just Stop Oil high visibility vests and a leaflet containing instructions to follow when interacting with police

Knorr, who had been remanded in custody prior to sentencing, said: 'Since my imprisonment began, things have continued to get worse. The world still sleepwalks towards hell.

'People are taking action because they are terrified of what rising temperatures and food shortages will mean for them and for their kids.

'So as long as the climate crisis keeps getting worse, people will keep taking action, prison or not.'

Ward said: 'I'm not worried about my sentence, I'm worried about living in a world where crop failure means I can't put food on the table.

'I acted because doing nothing is unthinkable and because the science is clear. We have no other option.'

CLAIM NO: KB-2024-1765

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LONDON CITY AIRPORT LIMITED

(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

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

SSW10

This is the exhibit marked "SSW10" referred to in the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025.

Neutral Citation Number: [2025] EWCA Crim 199

Case No: 202402963 A5; 202402960 A5; 202402964 A5; 202402965 A5; 202402969 A5; 202403124 B5; 202403120 B5; 202403122 B5; 202403125 B5; 202403126 B5; 202403583 A2; 202403585 A2; 202403587 A2; 202403589 A2; 202403834 A3; 202403837 A3

IN THE COURT OF APPEAL (CRIMINAL DIVISION)
ON APPEAL FROM THE CROWN COURT AT SOUTHWARK
His Honour Judge Hehir
T20227305 & T20220798

ON APPEAL FROM THE CROWN COURT AT BASILDON
His Honour Judge Collery KC
T20230007, T20230014 & T20240019

ON APPEAL FROM THE CROWN COURT AT BASILDON
His Honour Judge Graham
T20227191, T20220422 & T20230086

Royal Courts of Justice
Strand, London, WC2A 2LL

Date: 07/03/2025

Before :

THE LADY CARR OF WALTON-ON-THE-HILL
THE LADY CHIEF JUSTICE OF ENGLAND AND WALES
MR JUSTICE LAVENDER
and
MR JUSTICE GRIFFITHS

- -

Between :

JULIAN ROGER HALLAM
LUCIA WHITTAKER DE ABREU
DANIEL SHAW
LOUISE CHARLOTTE LANCASTER
CRESSIDA GETHIN

PAUL SOUSEK
GAIE DELAP
THERESA HIGGINSON
PAUL BELL
GEORGE SIMONSON

CHRIS BENNETT
JOE HOWLETT

□□□

SAMUEL JOHNSON
LARCH MAXEY

PHOEBE PLUMMER
ANNA ELLEN HOLLAND **Appellants**

- and -

REX **Respondent**

- and -

FRIENDS OF THE EARTH LTD
GREENPEACE LTD **Interveners**

- - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - -

Danny Friedman KC and Owen Greenhall (instructed by **Hodge Jones & Allen Solicitors**) for **Hallam, Whittaker de Abreu, Shaw** and **Gethin**
Danny Friedman KC and Robbie Stern (instructed by **Hodge Jones & Allen Solicitors**) for **Lancaster**
Raj Chada, Solicitor Advocate (instructed by **Hodge Jones & Allen Solicitors**) for **Bennett** and **Maxey**
Jacob Bindman (instructed by **Hodge Jones & Allen Solicitors**) for **Bell, Delap, Sousek** and **Higginson**
John Briant (instructed by **Amosu Robinshaw Ltd**) for **Simonson**
Francesca Cociani, Solicitor Advocate, (instructed by **Hodge Jones & Allen Solicitors**) for **Howlett**
Laura O'Brien, Solicitor Advocate, (instructed by **Hodge Jones & Allen Solicitors**) for **Johnson**
Rosalind Comyn (instructed by **Hodge Jones & Allen Solicitors**) for **Plummer**
Brenda Campbell KC (instructed by **Hodge Jones & Allen Solicitors**) for **Holland**

Jocelyn Ledward KC and Fiona Robertson (instructed by the **Crown Prosecution Service**) for the **Respondent** in respect of **Hallam, Whittaker de Abreu, Shaw, Gethin and Lancaster**
Paul Sharkey and Edward Gordon-Saker (instructed by the **Crown Prosecution Service**) for the **Respondent** in respect of **Sousek, Delap, Bell, Simonson and Higginson**
James Curtis KC and Charlotte Oliver (instructed by the **Crown Prosecution Service**) for the **Respondent** in respect of **Bennett, Howlett, Johnson and Maxey**
Ben Lloyd (instructed by the **Crown Prosecution Service**) for the **Respondent** in respect of **Plummer and Holland**

Alex Goodman KC and Jessica Jones (instructed by **Lloyds PR Solicitors**) for the **Interveners**

Hearing dates: 29 and 30 January 2025

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Approved Judgment

This judgment was handed down in Court 4 at 10.00am on Friday 7 March 2025 by circulation to the parties or their representatives by e-mail and by release to the National Archives.

.....

The Lady Carr of Walton-on-the-Hill, CJ :

The structure of this judgment is as follows:

(1) **Introduction**: paragraphs 1 to 8.

(2) **The Common Issues**:
- (a) *R v Trowland* [2023] EWCA Crim 919; [2024] 1 WLR 1164: paragraphs 9 to 24.
- (b) Conscientious motivation: paragraphs 25 and 26.
- (c) Articles 10 and 11: paragraphs 27 to 42.
- (d) Sentences in other public nuisance cases: paragraphs 43 to 46.
- (e) The Aarhus Convention: paragraphs 47 to 51.

(3) **The M25 Conspiracy Case**:
- (a) The Judge's Ruling and Sentencing Remarks: paragraph 52 to 79.
- (b) General Issues: paragraphs 80 to 84.
- (c) Roger Hallam: paragraphs 85 to 89.
- (d) Lucia Whittaker de Abreu: paragraphs 90 to 93.
- (e) Louise Lancaster: paragraph 94.
- (f) Cressida Gethin: paragraphs 95 to 99.

(4) **The M25 Gantry Climbers Case**:
- (a) The Judge's Sentencing Remarks: paragraphs 100 to 124.
- (b) General Issues: paragraphs 125 to 128.
- (c) Gaie Delap: paragraphs 129 to 134.
- (d) Paul Sousek: paragraph 135.
- (e) Theresa Higginson: paragraph 136.
- (f) Paul Bell: paragraphs 137 and 138.
- (g) George Simonson: paragraphs 139 to 141.

(5) **The Thurrock Tunnels Case:**
- (a) The Judge's Sentencing Remarks: paragraphs 142 to 148.
- (b) General Issues: paragraphs 149 to 152.
- (c) Chris Bennett: paragraphs 153 to 155.
- (d) Dr Larch Maxey: paragraphs 156 to 162.
- (e) Samuel Johnson: paragraphs 163 to 166.
- (f) Joe Howlett: paragraphs 167 to 169.

(6) **The Sunflowers Case:**
- (a) The Judge's Ruling and Sentencing Remarks: paragraphs 170 to 176.
- (b) General Issues: paragraphs 177 to 182.
- (c) Phoebe Plummer: paragraphs 183 to 186.
- (d) Anna Holland: paragraphs 187 to 190.

(7) **Conclusion**: paragraph 191.

(1) Introduction

1. 16 applications for leave to appeal against sentence have been referred to the full court by the Registrar. We grant leave to appeal on all applications and proceed to consider the substantive appeals.

2. The appellants were among the defendants sentenced in four cases for offences committed in connection with protests in the period from August to November 2022. The protests were committed in the name of Just Stop Oil about climate change issues. In this introductory section, we summarise the four cases in chronological order of the offences committed.

3. ***The Thurrock Tunnels Case***: In August 2022 protesters occupied tunnels under the roads providing access to the industrial estate which includes the Navigator oil terminal in Thurrock, Essex. Their activities caused the roads to be closed. Four appellants, each convicted on 20 March 2024 of conspiracy to cause a public nuisance contrary to s. 1(1) of the Criminal Law Act 1977, appeal against the immediate custodial sentences imposed on them on 6 September 2024 in the Crown Court at Basildon by HHJ Graham, namely:

    i) Chris Bennett: 18 months' imprisonment.

    ii) Dr Larch Maxey: 36 months' imprisonment.

    iii) Samuel Johnson: 18 months' imprisonment.

    iv) Joe Howlett: 15 months' imprisonment.

4. ***The Sunflowers Case***: On 14 October 2022 two protesters threw soup onto Vincent van Gogh's painting known as "Sunflowers" in the National Gallery. They were each convicted on 25 July 2024 of criminal damage contrary to s. 1(1) of the Criminal Damage Act 1971 and appeal against the immediate custodial sentences imposed on them on 27 September 2024 in the Crown Court at Southwark by HHJ Hehir, namely:

    i) Phoebe Plummer: 24 months' imprisonment.

    ii) Anna Holland: 20 months' imprisonment.

5. ***The M25 Conspiracy Case:*** Between 7 and 10 November 2022 45 protesters were arrested after climbing, or attempting to climb, onto various gantries across the M25 motorway. Five appellants, each of whom was convicted on 11 July 2024 of conspiracy to cause a public nuisance contrary to s. 1(1) of the Criminal Law Act 1977, appeal against the custodial sentences imposed on them on 18 July 2024 in the Crown Court at Southwark by HHJ Hehir, namely:

    i) Roger Hallam: 5 years' imprisonment.

    ii) Daniel Shaw: 4 years' imprisonment.

    iii) Lucia Whittaker de Abreu: 4 years' imprisonment.

    iv) Louise Lancaster: 4 years' imprisonment.

v) Cressida Gethin: 4 years' imprisonment.

6. ***The M25 Gantry Climbers Case:*** Five appellants were among those who climbed gantries over the M25 on 9 November 2022 as part of the protest organised by the defendants in the M25 Conspiracy case. On the second day of trial, 5 March 2024, they pleaded guilty to causing a public nuisance contrary to s. 78(1) of the Police, Crime, Sentencing and Courts Act 2022 (s.78(1)) (the 2022 Act). They appeal against the custodial sentences imposed on them on 1 August 2024 in the Crown Court at Basildon by HHJ Collery KC, namely:

i) Gaie Delap: 20 months' imprisonment.

ii) Paul Sousek: 20 months' imprisonment.

iii) Theresa Higginson: 24 months' imprisonment.

iv) Paul Bell: 22 months' imprisonment.

v) George Simonson: 24 months' imprisonment.

7. These appeals raise certain general issues concerning the approach to sentencing in cases of this nature which are common to some or all of the individual cases. We were provided with lengthy written submissions and authorities by all parties, including the interveners, supplemented by two days of oral submissions. Nevertheless, the central points of principle can be made shortly:

i) The exercise of sentencing in cases of non-violent protests is to be carried out in accordance with normal sentencing principles, including those contained in ss. 57, 63 and 231(2) of the Sentencing Act 2020.

ii) The correct approach to issues that may arise when sentencing in cases of non-violent protests, such as conscientious motivation and deterrence, was considered authoritatively in *R v Trowland* [2023] EWCA Crim 919; [2024] 1 WLR 1164 (*Trowland*), to which there was no challenge before us.

iii) The sentencing exercise in cases of non-violent protest should not be over-complicated because of the engagement of the European Convention of Human Rights (ECHR). Whether or not Articles 10 and/or 11 of the ECHR (Article 10; Article 11) are engaged should be simple; if engaged, the court then has to carry out what should be a straightforward proportionality exercise. There should be no need to make extensive reference to domestic or international authorities. The parties agreed that the common law and the ECHR are in step. As was also common ground, if the common law principles in *Trowland* (identified below) are applied properly, the defendant's ECHR rights should be observed.

iv) References to the sentencing outcomes in different cases are unlikely to be helpful, since each case will turn on its own facts. It can also be dangerous. The parties spent much time pointing to the custodial sentence (of three years) imposed on Morgan Trowland. However, the term of three years was not a tariff of any sort. Indeed, whilst upheld on appeal, it was held to be severe (and arguably manifestly excessive). An approach that treats a three year term for

offending similar to that in *Trowland* as a benchmark risks undesirable and unwarranted sentence inflation.

8. We address the general issues first before turning to the facts of the individual cases.

(2) The Common Issues

(2)(a) R v Trowland

9. *Trowland* concerned the sentences imposed on two Just Stop Oil protesters who disrupted the M25 motorway by climbing onto the Queen Elizabeth II bridge above the motorway on 17 October 2022. They were each convicted on 4 April 2023 of causing a public nuisance contrary to s. 78(1). They appealed against the sentences imposed on them on 21 April 2023 in the Crown Court at Basildon, namely 3 years' imprisonment in the case of Morgan Trowland, and 2 years and 7 months' imprisonment in the case of Marcus Decker.

10. The judgment of the court (at [42] to [51]) addressed the relevant legal background and principles authoritatively.

11. It dealt first with the introduction of the new offence in s. 78 of the 2022 Act (s. 78) as follows:

> "42. …Section 78, which came into force on 28 June 2022, enacted a new offence of intentionally or recklessly causing public nuisance and (by section 78(6)) abolished the common law offence of public nuisance. It was introduced in the context of increasing non-violent protest offending by organisations such as Extinction Rebellion and Insulate Britain.

12. The court went on:

> "46. By section 78 Parliament thus introduced a new offence which covers (intentional or reckless) non-violent protest (for which there is no reasonable excuse). Three points deserve emphasis. First, s. 78(1)(c) introduces a fault element (of intention or recklessness), which the common law offence did not require. The LCR commented that: "[i]t is unjust that defendants should be exposed to such a serious sanction unless there is equally serious fault on their part" (see [3.53]). Secondly, s. 78(1)(b)(ii) makes it a criminal offence if a person "obstructs the public or a section of the public in the exercise or enjoyment or a right that may be exercised or enjoyed by the public at large". There is no qualification that the act of obstruction must be serious or significant before it becomes a criminal offence. Thirdly, custodial sentences of up to 10 years can be warranted."

13. The court also commented later:

> "83… In implementing section 78 Parliament expressed its clear intention that stringent custodial sentences may be required for (intentional or reckless) non-violent protest offending for which there is no reasonable excuse. The 10-year maximum term provides sentencing context that

was previously absent; it represented Parliament's assessment of the seriousness of the offending."

14. The court addressed the correct approach to sentencing for s. 78(1) offences as follows:

> "47. There is no definitive Sentencing Council Guideline specific to the offence (nor for any obvious analogous offence). The court thus takes into account the statutory maximum and any relevant sentencing judgments of this court. We have not been shown any appellate judgments addressing the sentencing regime for the statutory offence of public nuisance, although there are appellate judgments arising out of sentences for the old common law offence. They are considered below, in particular *Roberts* and *Brown*, where the relevant Strasbourg jurisprudence was also examined.
>
> 48. The seriousness of the offence is to be assessed by considering the culpability of the offender and the harm caused by the offending (see s. 63 of the Sentencing Act 2020). The court must also consider which of the five purposes of sentencing identified in s. 57 of the Sentencing Act 2020, namely punishment, reduction of crime (including its reduction by deterrence), reform and rehabilitation, public protection and the making of reparation, it is seeking to achieve through the sentence that is to be imposed. Once a provisional sentence is arrived at, the court takes into account relevant aggravating and mitigating features. Other considerations, such as totality, may be engaged under the stepped approach set out in the Sentencing Council's General Guideline: Overarching Principles. Custodial sentences must be what is, in the opinion of the court, the shortest term commensurate with the seriousness of the offence (see s. 231(2) of the Sentencing Act 2020).
>
> 49. The (qualified) rights to freedom of expression and assembly under Articles 10 and 11 are relevant to sentence. Article 11 is generally seen as a more specific, or lex specialis, form of the right to freedom of expression in Article 10, and the two can be considered together. Particular caution is to be exercised in imposing a custodial sentence in non-violent protest cases. (See *Taranenko v Russia* (App No 19554/05) (2014) ECHR 485 ; 37 BHRC 285 at [87]; *Kudrevicius v Lithuania* (App No 37553/05) (2016) 62 EHRR 34; 40 BHRC 114 ("Kudrevicius") at [146]; *Roberts* at [43].) It may also be relevant if the views being expressed relate to important and substantive issues (see *DPP v Ziegler and others* [2021] UKSC 23; [2022] AC 408 ("*Ziegler*") at [72]), although we emphasise immediately below the limits of such consideration. Determination of the proportionality of an interference with ECHR rights is a fact-specific enquiry which requires the evaluation of the circumstances in the individual case. It is a flexible notion, which depends on fair and objective judicial assessment; there are no rigid rules to be applied. The inquiry requires consideration of the questions identified by the Divisional Court at [63] to [65] of its judgment in *DPP v Ziegler* [2019] EWHC 71 (Admin); [2020] QB 253 (cited by the Supreme Court at [16]).
>
> 50. It is no part of the judicial function to evaluate (or comment on) the validity or merit of the cause(s) in support of which a protest is made

(see Roberts at [32]). However, a conscientious motive on the part of protesters may be a relevant consideration, in particular where the offender is a law-abiding citizen apart from their protest activities. In such cases, a lesser sanction may be appropriate: a sense of proportion on the part of the offender in avoiding excessive damage or inconvenience may be matched by a relatively benign approach to sentencing. The court may temper the sanction imposed because there is a realistic prospect that it will deter further law-breaking and encourage the offender to appreciate why in a democratic society it is the duty of responsible citizens to obey the law and respect the rights of others, even where the law is contrary to the protesters' own moral convictions. However, the more disproportionate or extreme the action taken by the protester, the less obvious is the justification for reduced culpability and more lenient sentencing. (See *R v Jones (Margaret)* [2006] UKHL 16; [2007] 1 AC 136 ("*Jones*") at [89]; *Roberts* at [33] and [34]; *Cuadrilla Bowland Ltd v Persons Unknown* [2020] EWCA Civ 9; [2020] 4 WLR 29 ("*Cuadrilla*") at [98] and [99]; *National Highways Ltd v Heyatawin and others* [2021] EWHC 3078 (QB); [2022] Env LR 17 at [50] to [53]; *Brown* at [66].)

51. Ultimately, whether or not a sentence of immediate custody for this type of offending is warranted, and if so what length of sentence is appropriate, will be highly fact-sensitive, set in the context of the relevant legislative and sentencing regime identified above."

15. The court also indicated that conscientious motivation was a factor most logically relevant to the assessment of culpability, as opposed to general mitigation (see [55]).

16. These general principles are applicable in the present cases, while recognising that the M25 Gantry Climbers case was the only case in which the defendants were convicted of the substantive offence of causing a public nuisance, contrary to s. 78(1). (As set out above, in the Thurrock Tunnels and M25 Conspiracy cases the defendants were convicted of conspiracy to cause a public nuisance; and in the Sunflowers case the defendants were convicted of criminal damage, for which there is a Sentencing Council Guideline.)

17. In terms of the application of the principles to the facts in Trowland and conscientious motivation, the court stated:

> "56. The judge does appear to have treated the protesters' conscientious motives primarily as a matter of mitigation (for which he applied 25% credit). This reflected the manner in which the issue was presented to him on behalf of the protesters at the time of sentencing (i.e. that this was a matter of mitigation). As set out above, we consider that, strictly speaking, these were matters more relevant to culpability. However, the judge elsewhere referred to the fact that the protesters' motives led him to reduce his assessment of their culpability; and, ultimately, we do not consider that any error in approach was material. What matters is whether the protesters' conscientious motives which caused them to exercise their rights of freedom of expression and assembly were reflected properly in the ultimate sentences. As set out further below, we consider that they were."

18. As for culpability, the court stated:

> "72. The judge was entitled to find the protesters' culpability to be high, despite their conscientious motivation, not least given the extensive planning involved. There was an event planner working with the protesters; the bridge had been chosen as a spectacular protest site in order to attract media attention; another individual had dropped them off on the bridge and then called the police; Mr Trowland had sketched the bridge to work out how the plan could be executed; the date had been chosen by reference to the government's autumn agreement to increase gas and oil licences; Mr Trowland undertook media communications training in order that his message could be better communicated; both protesters practised climbing and throwing ropes between them to facilitate the erection of the banner and the hammocks; specific equipment had been purchased and they carried out a risk assessment; they took food and drink with them.
>
> 73. The reasons given by the judge for his finding of culpability were entirely sound: the choosing of a high profile target for maximum disruption; the extensive organisation and planning; the protesters' awareness that the road would be closed and disruption would be caused; that they stayed on the bridge for far longer than was proportionate; their choice to ignore the disruption and anger that would be caused to others; the fact that requests to come down were ignored, as were the risks to those who had to remove them from the bridge in the cherry picker. The protesters' motive was their concern about climate change but the action taken was totally disproportionate."

19. The court proceeded on the basis that the defendants' rights under Articles 10 and 11, whilst engaged, were significantly weakened on the facts:

> "74. The Article 10 and Article 11 protections, whilst not removed, were significantly weakened on the facts. As set out above, the s. 78(3) defence of "reasonable excuse", which incorporates Article 10 and Article 11 protections, was not available to the protesters. The protest was taking place on land from which the public were excluded. The further away from the core Article 10 and 11 rights a protester is, the less those rights merit an assessment of lower culpability or, putting it another way, a significant reduction in sentence (see *Kudrevicius* at [97]). In fact, by ascending the bridge, the protesters were committing a criminal offence under the Dartford-Thurrock Crossing Act 1988 (as set out above). This is relevant to an evaluation of whether the sentences were manifestly excessive and/or proportionate.
>
> 75. Further, the Article 10 and Article 11 protections were weakened by the fact that the disruption here was the central aim of the protesters' conduct, as opposed to a side-effect of the protest. Persuasion is very different from attempting (through physical obstruction or similar conduct) to compel others to act in a way a defendant desires. The distinction between protests which cause disruption as an inevitable side effect and protests which are deliberately intended to cause disruption is an important one. (See *Cuadrilla* at [43] and [94].)

> 76. The judge was also entitled to conclude that the obstruction was significant: indeed, in this case it was of the utmost seriousness. It affected the Strategic Road Network, a network that was essential to the growth, wellbeing and balance of the nation's economy. We have referred to the protest's striking effects in statistical terms above, together with the evidence from affected individuals and businesses. Hundreds of thousands of members of the public were affected, some very significantly. In short, the protest resulted in enormous practical and personal disruption, alongside damage to businesses and the economy and a need for the deployment of significant police and Highways Agency resource and assistance."

20. The court addressed the judge's approach to the protesters' previous convictions and rehabilitation prospects as follows:

> "58. … The judge did not ignore the prospect of rehabilitation; as recorded above, he referred expressly to it as "an important factor". But he concluded that there were no signs that the protesters were any less committed to the causes that they espoused, and referred to Mr Trowland's evidence in which he set out at length the beliefs that motivated him. The strength of the protesters' beliefs was on any view material to the question of rehabilitation. As was stated in *Roberts* at [47], when making a judgment about the risks of future offending, underlying motivations can be of great significance.
>
> 59. The judge was entitled to reject that the protesters' apologies were genuine and to take the view that they were inadequate and self-serving. The judge was concerned that they would continue to engage in their illegal activities despite their indications to the contrary. As he put it, "history indicate[d] that they were unreliable in that regard". They had been repeatedly released on bail and continued to offend. The fact that, in other domestic cases, undertakings by defendants not to offend have been accepted (see for example Roberts at [46] to [51] and McKechnie at [38]) is nothing to the point. This was pre-eminently a matter for the judge to assess...
>
> 77. As for mitigation, as already identified above, the judge was entitled to take the view that the protesters' apologies rang hollow and to harbour real concern that they would continue to engage in such protest activities as they though fit, despite their evidence to the contrary. The judge was aware of the protesters' personal histories. We do not consider that any significant weight falls to be attached to character references in the context of this type of offending, which is typically committed by those of otherwise good character. As set out above, albeit that it was a matter more properly addressed in the context of culpability, the judge also took account of their conscientious motives, affording 25% credit in this regard. This was not only fair, but arguably generous to the protesters in circumstances where there was no sense of proportion in their activities. They did nothing to avoid excessive damage or inconvenience: on the contrary, their conduct was designed to (and did) cause extreme damage and inconvenience."

21. Finally, it is relevant to note what was said in relation to deterrence as an aim of sentencing in these types of cases. The protesters relied on the observations made by Leggatt LJ in *Cuadrilla Bowland Ltd v Persons Unknown* [2020] EWCA Civ 9; [2020] 4 WLR 29 *(Cuadrilla*) (in [98] and [99]), to the effect that, in general, there is reason to expect that less severe punishment is required to deter protesters from further law-breaking in comparison to other offenders. The court in *Trowland* commented:

> "66. These comments do not appear to us materially to advance the protesters' challenge. First, they are general in nature and always subordinate to the fact-sensitive exercise to be carried out in each case. Secondly, the direct aim of the protesters here was to cause maximum disruption (in order to deliver their message); a stand-out feature in this case is the lack of moderation on the part of the protesters. Thirdly, conscientious motivation/moral difference is already factored into the question of culpability, as identified above. Fourthly, as for deterrence, that is an area pre-eminently to be assessed on the facts, and in any event Leggatt LJ was addressing only deterrence to the offenders themselves, not the wider public, which may be a highly relevant consideration. Fifthly, whilst the social bargain or "dialogue" continued beyond the offending itself, the disproportionate nature of the protesters' actions remains highly relevant; and again the specific facts of each case, such as previous convictions and bail status, take precedence."

22. Secondly, in addressing the protesters' reliance on *R v Roberts* [2018] EWCA Crim 2739; [2019] 1 Cr App R (S) 48 (*Roberts*) and *R v Brown* [2022] EWCA Crim 6; [2022] 1 Cr App R 18 (*Brown*) the court stated:

> "86. As set out above, the offending in *Roberts* and *Brown* occurred in 2017 and 2019 respectively. A court's perception of the strength of the need for deterrence can change over time. Specifically, as is common knowledge, supporters of organisations such as Just Stop Oil have staged increasingly well-orchestrated, disruptive and damaging protests. It can be said that the principle of deterrence is of both particular relevance and importance in the context of a pressing social need to protect the public and to prevent social unrest arising from escalating illegal activity."

23. It is against the background of the principles stated and applied in *Trowland* that we address the issues which arise in these cases. Indeed, counsel for the appellants submitted that the principal basis for the proposed appeals is the appellants' contention that the sentencing judges did not properly apply the principles stated in *Trowland*, not that those principles were wrong. Considering that submission will primarily be a matter for reviewing the facts of, and the sentencing exercise conducted in, each case.

24. Nevertheless, it is helpful to address at this stage the parties' submissions on principle in relation to i) conscientious motivation; ii) Articles 10 and 11; iii) sentences in other public nuisance cases; and iv) the Aarhus Convention.

(2)(b) Conscientious Motivation

25. It is not disputed that each of the appellants was motivated to act as they did by a conscientious desire to communicate their views about the appropriate response to climate change issues. The appellants contend that the sentencing judge in each case erred because he declined to make any reduction in the sentences imposed on them by reason of their conscientious motivation. The interveners, Friends of the Earth Limited and Greenpeace Limited, support this contention. The Crown submits that in each case the sentencing judge referred to *Trowland* and correctly acknowledged that conscientious motivation may result in greater leniency in sentencing, but explained why he considered that that factor should be afforded no particular weight on the facts.

26. We will consider in due course the sentencing remarks in each case, but it can be said in general terms at this stage:

    i) The appellants' conscientious motivation was a factor relevant to sentencing in each case. It would have been an error for the sentencing judge to conclude on the facts that it had no part whatsoever to play in the sentencing exercise;

    ii) As stated in *Trowland* (at [55]), conscientious motivation fell most logically to be factored into the assessment of culpability. However, conscientious motivation did not preclude a finding that any appellant's culpability was still high (see *Trowland* at [50] and [72]);

    iii) Contrary to Mr Friedman's submission for the protesters, a sentencing judge is not obliged to specify an amount by which they have reduced a custodial term to reflect a defendant's conscientious motivation. As a general proposition, a sentencing judge is not obliged to attribute specific percentage values or figures to individual factors which have been taken into account in the sentencing exercise: see for example *R v Ratcliffe* [2024] EWCA Crim 1498 at [81]. That includes not only aggravating and mitigating factors, but also factors, such as conscientious motivation, going to the assessment of culpability. There is no parallel to be drawn with the approach to discounts for guilty pleas, for which a quantified reduction in sentence is made at a discrete stage in the sentencing process.

(2)(c) Articles 10 and 11

27. Article 10 provides as follows:

> "1. Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. This Article shall not prevent States from requiring the licensing of broadcasting, television or cinema enterprises.
>
> 2. The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in

> confidence, or for maintaining the authority and impartiality of the judiciary."

28. We note that the appellants' message in these cases constituted "political speech", to which particular respect is afforded: it involved a call for a change in the law. There were ways in which the appellants could have communicated that message without trespassing and without committing a criminal offence. But the fact that they committed a trespass and a criminal offence in communicating that message did not mean that their activity ceased to be an expression of their views.

29. Article 11 provides as follows:

> "1. Everyone has the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and to join trade unions for the protection of his interests.
> 2. No restrictions shall be placed on the exercise of these rights other than such as are prescribed by law and are necessary in a democratic society in the interests of national security or public safety, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others. This Article shall not prevent the imposition of lawful restrictions on the exercise of these rights by members of the armed forces, of the police or of the administration of the State."

30. As with other ECHR rights, the analysis of alleged violations of these rights generally follows five stages:

i) Does the right apply to the facts of the case? (This is often expressed by asking whether the right is "engaged" by the facts of the case.)

ii) Has there been an interference with the right?

iii) Was the interference "prescribed by law"?

iv) Did the interference pursue a legitimate aim?

v) Was the interference "necessary in a democratic society"? (This is usually expressed by asking whether the interference with the right was proportionate. In cases such as the present, the assessment of proportionality applies at each stage, i.e. prosecution, conviction and sentence.)

31. The appellants submitted that the sentences imposed constituted a disproportionate interference with their rights under Articles 10 and 11. The interveners supported this submission; the Crown opposed it. We address the proportionality of the sentences when we consider the individual cases, while noting the guidance in *Trowland* at [49], [74] and [75]. We deal here, however, with two preliminary issues which arise in connection with this ground of appeal and which concern the question whether Articles 10 and 11 apply at all on the facts of these cases.

32. Miss Ledward for the Crown submitted that Articles 10 and 11 are not engaged in a protest case if the protesters are trespassing (a contention not positively advanced in *Trowland*). It was not disputed that the protesters who climbed gantries on the M25

were trespassing, since the public are not allowed access to the gantries. It was submitted that the legal position is less straightforward in the Thurrock Tunnels case, since the tunnels were underneath a public highway, but that the occupants of one of the tunnels had trespassed on railway property in order to access the tunnel. As for the Sunflowers case, it was said that the judge was right to conclude, as he did, that Articles 10 and 11 did not apply because the protest was violent or non-peaceful.

(2)(c)(i) Articles 10 and 11 and Trespass

33. There can be circumstances in which speech falls outside the protection afforded by Articles 10 and 11, such as those identified in Article 17 of the ECHR. However, Article 17 was not relied on in the present cases.

34. Articles 10 and 11 did not confer on the appellants a right of entry to private property: see *Appleby v United Kingdom* (2003) Application No. 44306/98. Moreover, disrupting traffic has been held not to be at the core of Articles 10 and 11: see *Kudrevičius v Lithuania* (2015) 62 E.H.R.R. 34, at 91. However, we were not referred to any case in which the European Court of Human Rights (the ECtHR) has decided that a protester who commits an act of trespass thereby automatically loses their rights under Article 10 or 11 altogether. On the contrary, *Steel v United Kingdom* (1998) 23 September was a case involving "a protest against the extension of a motorway involving a forcible entry into the construction site and climbing into the trees to be felled and onto machinery in order to impede the construction works" (see the description in *Taranenko v Russia* (2014) Application No. 19554/05 (*Taranenko*), at §70). The expression of opinion was found to be protected by Article 10.

35. We do not consider that *DPP v Cuciurean* [2022] EWHC 736 (Admin); [2022] QB 888 (*Cuciurean*) at [39] to [50] assists us on this point. *Cuciurean*, which involved a challenge to prosecution and conviction (not sentence) for aggravated trespass, contrary to s. 68 of the Criminal Justice and Public Order Act 1994, did not determine the question of whether Articles 10 and 11 were engaged.

36. Although the appellants' activities were not at the core of Articles 10 and 11, we do not consider that their acts of trespass removed them completely from the scope of Articles 10 and 11. Rather, as in *Trowland* (at [74] and [75]), the fact that the appellants' expressions of opinion involved criminal trespass significantly weakened the protections afforded by Articles 10 and 11 (and so the weight to be attached to those protections when considering proportionality of sentence).

(2)(c)(ii) The Applicability of Articles 10 and 11 in the Sunflowers Case

37. In the Sunflowers case, the judge gave a careful ruling during the course of trial in which he held that neither the conviction nor the sentencing of the appellants engaged any issue of proportionality. In his judgment, Articles 10 and 11 did not apply at all because i) the actions of Ms Plummer and Mx Holland were violent and not peaceful; and ii) they caused significant damage. He referred in particular to *Attorney General's Reference (No 1 of 2022)* [2022] EWCA Crim 1259; [2023] KB *37 (Colston)* at [120] and [121].

38. The judge was correct to state that Articles 10 and 11 were not engaged if Ms Plummer and Mx Holland's actions were violent/non-peaceful (see for example *Colston* at [115]

and [120]); but he was wrong to hold that they were also not engaged if the damage was significant. *Colston* at [120] and [121] provides no support for such a conclusion: all that was being said in *Colston* was that the extent of damage was relevant to the proportionality of any conviction.

39. If, as we conclude below, this was not violent offending, the judge's error was material.

40. *Colston* confirmed that "[v]iolence is not confined to assaults on the person but may include damage to property" (see [87]). For example, criminal damage might be appropriately deemed "violent" if it intimidates onlookers. *Colston* concerned the prosecution for criminal damage of protesters who pulled down a statue and threw it into a harbour.

41. For present purposes, the case of *Murat Vural v Turkey* (2014) Application No. 9540/07 provides the most useful comparison. There the applicant poured paint on five public statutes of Kemal Atatűrk. The ECtHR held that Article 10 was engaged by the applicant's actions. In the same way, we consider that Ms Plummer and Mx Holland's actions engaged Articles 10 and 11. While shocking, their actions were not violent.

42. For these reasons, Articles 10 and 11 were engaged on the facts of the Sunflowers case (albeit significantly weakened).

(2)(d) Sentences in Other Public Nuisance Cases

43. The appellants in the M25 Conspiracy, M25 Gantry Climbers and Thurrock Tunnels cases submitted that the sentencing judge in each case failed to have proper regard to relevant caselaw on sentencing for public nuisance. The appellants referred in particular in this context to:

    i) *R v Chee Kew Ong* [2001] 1 CrAppR (S) 117, in which the defendant committed the offence of conspiracy to cause a public nuisance when he extinguished the floodlights at a Premier League football match, causing the match to be abandoned, for the benefit of individuals who had placed bets on the match abroad.

    ii) *R v Cleator* [2016] EWCA Crim 1361, in which the drunken defendant committed the common law offence of causing a public nuisance by climbing onto and remaining on a structure over the M56 motorway near Manchester.

    iii) *Roberts*, in which the defendant protesters committed the common law offence of causing a public nuisance by climbing on top of lorries and blocking the A583 near Blackpool.

    iv) *Brown,* in which the defendant committed the offence of aggravated trespass, contrary to s. 68 of the Criminal Justice and Public Order Act 1994, by climbing on top of and gluing himself to an aeroplane at London City Airport.

    They also referred to the Sentencing Council Guideline for Offences of Violent Disorder.

44. The Crown submitted that the sentencing judges each had proper regard to what was the only case on sentencing for the new offence created by s. 78(1), namely *Trowland*.

45. The submissions made by the appellants and the interveners address the issue of the relationship between the new statutory offence under s. 78(1) and the common law offence abolished by s. 78(6) of the 2022 Act. In this regard, we see no reason to depart from what was said in *Trowland* (at [46], [47], [78], [79] and [83] to [86]). Each case must, of course, be decided on its own facts, but, insofar as comparisons with sentences in other cases are relevant at all (as to which see paragraph 7(iv) above), sentencing judges in cases such as the present are more likely to be assisted by decisions on the new statutory offence than by decisions on other offences.

46. Particular reference is made in this context to the issue of deterrence. Again, we see no reason to expand on what was said on this issue in *Trowland,* including in relation to *Roberts* and *Brown* (see [66], [83] and [86]). (It can of course also be noted that the sentences imposed in cases decided before *Trowland* did not in fact deter these appellants from committing the offences of which they were convicted. As Mr Friedman volunteered, the appellants expected to go to prison for at least a while. The prospect of short immediate custodial sentences was self-evidently not a sufficient deterrent.)

(2)(e) The Aarhus Convention

47. The appellants submitted that the Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the Aarhus Convention) is relevant both as an aid to interpreting ECHR rights and as something to be taken into account by a judge in exercising a discretion, as judges do in determining the appropriate sentence in a particular case. On that basis, the appellants submitted that the Aarhus Convention, in particular article 3(8), supplements their other grounds of appeal. In addition, the appellants submitted that the sentencing judges should have had regard to the views of the UN Special Rapporteur on Environmental Defenders (the UN Special Rapporteur), who had criticised the decision in *Trowland*. However, Mr Friedman confirmed that it was not the appellants' case that the Aarhus Convention added anything to the other grounds of appeal, rather than simply supporting them.

48. The Crown submitted that the Aarhus Convention did not apply to the activities of the appellants in the present cases and that it would not have been appropriate for the sentencing judges to take account of or to afford any weight to expressions of opinion by the UN Special Rapporteur.

49. In our judgment, it would not have been appropriate for the sentencing judges to have had regard to the Aarhus Convention or the views of the UN Special Rapporteur. The Aarhus Convention is not incorporated into English law. That is sufficient, in itself, to decide the point. However, we also agree with the Crown's submission that article 3(8) of the Aarhus Convention did not apply to the appellants' activities. Article 3(8) provides as follows:

> "Each Party shall ensure that persons exercising their rights in conformity with the provisions of this Convention shall not be penalized, persecuted or harassed in any way for their involvement. This provision shall not affect the powers of national courts to award reasonable costs in judicial proceedings."

50. The appellants in these cases were penalised, but they were not penalised for "exercising their rights in conformity with the provisions of" the Aarhus Convention. They were penalised for committing criminal offences. It is, rightly, not suggested that their prosecution or conviction was contrary to the Aarhus Convention. Neither was their sentencing.

51. We turn now to the particulars of the sentencing exercises in each of the four cases in the order in which the arguments were presented to us. For the avoidance of doubt, in each case, we have considered the question of proportionality independently and our conclusions produce a result in each case which we judge to be proportionate (in line with the approach outlined in *Trowland* at [88]).

(3) The M25 Conspiracy Case

(3)(a) The Judge's Ruling and Sentencing Remarks in the M25 Conspiracy Case

52. All the appellants in the M25 Conspiracy case were convicted on 11 July 2024 after a four-week trial before HHJ Hehir and a jury. They were sentenced on 18 July 2024 by the trial judge.

(3)(a)(i) Trial ruling

53. In the course of the trial, on 8 July 2024 HHJ Hehir gave a ruling on whether certain proposed defences were available to the defendants. On 11 July 2024 he gave his written reasons for deciding that they were not. One of the proposed defences was that conviction would be a disproportionate interference with the defendants' rights under Articles 10 and 11. We emphasise that the judge was ruling on this as a potential defence against conviction, rather than as a potential consideration at the sentencing stage. He held that Articles 10 and 11 were not engaged, because:

> "…those who climbed the gantries in furtherance of the conspiracy alleged did so as lawbreakers and trespassers. Article 10 of the ECHR confers no licence to trespass on somebody else's property in order to express one's views: see *Richardson v DPP* [2014] UKSC 8 per Lord Hughes at para 3. It must follow that neither can Article 11 confer such licence."

54. In the alternative, the judge ruled that conviction would not be a disproportionate interference with the defendants' Article 10 and 11 rights, even if those articles were engaged. He said:

> "…the conspiracy alleged against the defendants contemplated the most substantial disruption to traffic on London's orbital motorway. The Zoom call reveals the expression of the hope by Roger Hallam (and not dissented from by any other defendant) that the planned disruption would lead to total gridlock of the motorway system and other major roads. Such gridlock could have had catastrophic effects had it eventuated, by reference for example to food supplies and the maintenance of law and order. Although there was no total gridlock, very substantial disruption did occur.
> What occurred, and what was contemplated, was conduct of the sort identified by the European Court of Human Rights in *Kudrevicius v Lithuania* 62 EHRR

> 34 as falling outside the "core" of ECHR rights. In those circumstances, disproportionality is inherently unlikely."

55. The fact that this proportionality exercise had been conducted in relation to the prosecution of the offences did not, in itself, mean that proportionality did not also fall to be considered at the point where a sentence was to be passed. The proportionality of any interference with ECHR rights may be particularly relevant at the sentencing stage, even though the ECHR rights in question do not provide a defence to the charge: see *Roberts* at [34]; *Cuadrilla* at [87]; the consideration of *Taranenko* in *Colston* at [90]; and *Trowland* at [87-88].

(3)(a)(ii) Sentencing Remarks

56. In his sentencing remarks, the judge described the conspiracy as "a sophisticated plan to disrupt traffic on the M25 motorway by means of protestors climbing up the gantries over the motorway".

57. He noted the impact of the conspiracy as "disruption on the M25 for four successive days, from 7 November to 10 November 2022." Over 45 protestors climbed gantries at various points on the M25. "Every sector of this orbital motorway was affected". There was "massive disruption". Large sections of the M25 had to be closed each day, causing long tailbacks. Six police forces were involved and the estimated cost of the involvement of the Metropolitan Police alone was over £1 million. The total road impact time over the four days was 121 hours and 45 minutes. The total extent of the delay to road users was calculated at 50,856 hours. The number of affected vehicles was calculated at 708,523. The total economic cost of the four days of disruption was put at £769,966.

58. He referred to evidence from some of those affected, including (for example) people who had missed funerals.

59. The judge found that the appellants had intended, although they had failed to achieve, gridlock. He quoted the appellant Roger Hallam telling a meeting on Zoom on 2 November 2022, a few days before the protest (attended by all of his co-defendants):

> "A really, like, super-significant aspect of this project, which takes it away from anything that has happened before. And that's that it has the potential to create gridlock. In other words, if we take a section of motorway, a circular motorway, people block gantries at close equidistant spaces around that circle, at a certain time of the day, the whole motorway will fill up with cars, and then no one will be able to get on to that motorway, and it will back up on all the other motorways and all the other A-roads. In other words, it will cause a hundred times more disruption than simply two or three people doing it, right. And there's a whole mathematics around it."

60. The judge said:

> "The M25 intersects with no fewer than nine other motorways over its circular course, with the M40, the M1, the A1(M), the M11, the M20, the M26, the M23, the M3, and the M4. It also intersects with a number of major A-roads, into and out of London. In addition, four of London's airports, Heathrow, Gatwick,

> Luton, and Stanstead, lie close to the M25 with many of those travelling through or working at those airports using the M25 to get to and from them.
> Had the gridlock for which all five of you devoutly hoped come to pass, the consequences would have been catastrophic. Mass road disruption in London and southern England would have had major implications for food supplies and the maintenance of law and order, among other things.
> (…)
> Section 63 of the Sentencing Code requires me, in assessing the seriousness of your offending, to have regard not only to the harm you actually caused, but also the harm you intended to cause."

61. The judge recognised (see *Trowland* at [49]) that it was not his task to comment on the merits of the Just Stop Oil cause, but he said:

> "I think I can fairly observe that there is a general consensus, in both scientific and societal terms, that man-made climate change exists, and that action is required to mitigate its effects and risks. (…) I acknowledge that at least some of the concerns motivating you are, at least to some extent, shared by many."

62. The judge identified as aggravating factors for all appellants: (i) the very high level of disruption caused to the public; (ii) the even higher level of disruption intended; (iii) the harm risked from traffic accidents, to members of the emergency services bringing climbers down from gantries and to the climbers themselves; (iv) breach of an injunction granted by the High Court of which all the appellants were aware, since the injunction was referred to on the Zoom call; (v) previous convictions of one or more offences in relation to direct-action protest; and (vi) each of the appellants being on bail in respect of at least one other set of proceedings when committing this offence.

63. Turning to the appellants' conscientious motivation, the judge said:

> "I do not regard your status as non-violent, direct-action protestors as affording you any particular mitigation.
> (…)
> While there will be cases where the conscientious motives of protestors may permit a degree of leniency from this court, this is not one of them."

64. He cited *Trowland* at [50] ("the more disproportionate or extreme the action taken by the protestor, the less obvious is the justification for reduced culpability and more lenient sentencing") and said:

> "Yours is not an appropriate case for leniency. This was a conspiracy to cause extreme and disproportionate disruption."

65. He referred to all of the appellants (except Lucia Whittaker de Abreu) using the trial to conduct what he described as "a calculated campaign to disrupt the proceedings", although he said that he would not sentence them for their conduct during the trial. He said in relation to all of the appellants that:

> "…there is a real risk of each of you committing further serious offences in pursuit of your objectives, unless you are deterred from doing so by exemplary

sentences in this case. Such sentences will hopefully also deter others who share your outlook from doing what you did."

66. He then turned to the sentencing of each appellant individually.

(3)(a)(iii) Roger Hallam

67. The judge described Mr Hallam (aged 58 at the date of offending) as "a highly influential figure within Just Stop Oil" and, in relation to the M25 Conspiracy case, "the theoretician, the ideas man", who used the Zoom call "to inspire the troops and would-be troops", but also as "intimately involved in the practice". He "sat at the very highest level" of the conspiracy. He obtained the mathematical model for motorway disruption and he supervised its implementation.

68. He had relevant previous convictions, including 11 between 2017 and 2024, most recently for conspiracy to cause a public nuisance by disrupting Heathrow Airport operations with drones, for which he had received a suspended prison sentence which was still in force.

69. The judge found that there was no real personal mitigation, positive character references notwithstanding. Mr Hallam's claim to have changed his attitude was rejected, in part because of his conduct at the trial, when he and three other appellants "set about turning the proceedings themselves into a direct action protest".

70. His sentence of five years' imprisonment after a trial reflected the judge's conclusion that he was "at the very top of the tree so far as the conspiracy is concerned."

(3)(a)(iv) Daniel Shaw

71. The judge described Daniel Shaw (aged 36 at the date of offending) as "up to your neck in the organisation of this conspiracy" and, in particular, the recruitment and training of protestors.

72. He had one previous conviction for causing a public nuisance, committed in 2021 and sentenced with a community order in 2023 which was still in force.

73. The judge particularly mentioned the personal mitigation afforded by Mr Shaw's caring responsibilities. However, the judge said "your conduct during the trial deprives you of any mitigation based on the potential for rehabilitation".

(3)(a)(v) Lucia Whittaker de Abreu, Louise Lancaster and Cressida Gethin

74. The judge described each of Lucia Whittaker de Abreu, Louise Lancaster and Cressida Gethin as "a key organiser", because of their roles as speakers at the Zoom meeting chaired by Mr Shaw and principally addressed by Mr Hallam. He described the role of each of these three as to inspire would-be climbers of the gantries by describing their own previous experience of similar direct-action protest. What each of them said showed that they were familiar with the detail of what was planned and their enthusiasm for it.

75. They also did individual acts in furtherance of the conspiracy. Ms Lancaster rented safe-house accommodation in London for gantry climbers. She also bought "a considerable

amount of specialist equipment" for them. Ms Whittaker de Abreu and Ms Gethin were arrested when dressed and equipped to climb gantries themselves.

76. Ms Whittaker de Abreu (who was 33 at the date of offending) had three previous convictions for obstruction offences during direct-action protest. These had resulted in fines. In mitigation, the judge noted her health and caring responsibilities, but decided "that provides little by way of mitigation, given your conscious choice to engage in offending of this seriousness".

77. Ms Lancaster (who was 57 at the date of offending) had six previous convictions for offences committed during direct-action protest. The two most recent were a conviction in June 2023 for which she received a five-week prison sentence and a conviction in November 2023 for which the sentence was a suspended sentence of imprisonment. Her offence in the M25 Conspiracy was committed in breach of a suspended committal order imposed by the High Court for breach of a High Court injunction by climbing an M25 gantry on a previous occasion (July 2022, shortly before the M25 Conspiracy acts in November 2022) which she herself referred to in the Zoom call. There was no personal mitigation.

78. Ms Gethin (who was 20 at the date of offending) had three previous convictions for offences committed during direct-action protest. The most recent (for a substantive offence of public nuisance in relation to protest disruption on the M25) had resulted in a suspended sentence in February 2024. Her conviction also placed her in breach of a conditional discharge imposed in September 2022. In mitigation, the judge considered character references and material in respect of her health. He was satisfied that the health issues could be managed in prison. He referred to her young age (saying that she was "by far, the youngest of the defendants"). However, he did not regard it as providing any mitigation or justifying any treatment different from her co-defendants. He explained:

> "As the character evidence indicates, and as I learned for myself during the trial, you are an intelligent and well-educated young woman. Neither immaturity nor personal disadvantage has driven you to crime; your own conscious choices have."

79. The judge passed a sentence of four years' imprisonment on all four of the M25 Conspiracy appellants except Mr Hallam, stating that there were no grounds for differentiating between the four, notwithstanding various differences in their personal circumstances and antecedents.

(3)(b) General Issues in the M25 Conspiracy Case

80. In the M25 Conspiracy case, as in *Trowland*, disruption was the central aim of the appellants' conduct, as opposed to a mere side-effect of it. Moreover, Mr Hallam said explicitly in the Zoom call that the aim of the conspiracy was not merely to persuade (for example, by obtaining publicity for Just Stop Oil's arguments) but to compel. The aim was to achieve: "such massive economic disruption that the Government cannot ignore the demand"; and "sufficient mass disruption to force this Country to face its responsibilities and force this Government to respond to the illegality and immorality of what it is engaging in". The emphasis was on the word "force", a word which Mr Hallam used twice in these quotations. The protest was peaceful only in the sense that

it was non-violent. It was intended, however, to be on such a scale as to be coercive. As was said in *Trowland* at [75], "Persuasion is very different from attempting (through physical obstruction or similar conduct) to compel others to act in a way a defendant desires".

81. However, we read the judge's sentencing remarks as meaning that he took no account at all of the appellants' conscientious motivation. Whilst he was right that conscientious motivation is not a matter of mitigation, it is a factor which may reduce culpability (see *Trowland* at [55]). As was said in *Trowland* at [50], "the more disproportionate or extreme the action taken by the protester, the less obvious is the justification for reduced culpability and more lenient sentencing". However, this is, save in a most exceptional and extreme case, a matter of degree, rather than excluding consideration of conscientious motivation altogether. Even in the very serious case of *Trowland*, culpability was reduced materially by the presence of conscientious motivation. The weight to be given to this factor is for the judge to assess on the facts of every case.

82. The judge did not consider, at the sentencing stage, the effect of Articles 10 and 11. As previously explained, we consider that these articles were engaged in the M25 Conspiracy case. When ECHR rights are engaged, the proportionality question must always be asked. However, as we have already said (at paragraph 7(iii) above), if the common law principles set out in *Trowland* are applied properly, the defendant's ECHR rights should be observed.

83. The appellants in the M25 Conspiracy and M25 Gantry Climbers cases argued that there was a disparity between their sentences and those imposed on others involved in the same protest. We were presented with a table of all of those sentenced in relation to offences of public nuisance arising from the M25 Conspiracy, including seven individuals who are not parties to this appeal. The table stated their names, dates of birth, offence dates, sentence dates, whether the offence was charged as a conspiracy or the substantive offence, credit for plea (when relevant), sentence and the approximate sentence before credit for plea. It included no other details. The sentences ranged from a community order imposed on one of those not appealing to this court to the five years' imprisonment imposed on Mr Hallam.

84. Arguments based on disparity are always difficult, as was acknowledged by counsel. In cases which are so highly fact sensitive as these, both as to the nature of the offending and as to the personal involvement and personal circumstances of the offenders (see *Trowland* at [51]), there is little to be gained from the limited information provided.

(3)(c) The M25 Conspiracy Case: Roger Hallam

85. The sentencing judge was entirely justified in taking the serious view of Mr Hallam's offending that he did. We recognise that the judge was particularly well-placed, after a trial, to assess the overall seriousness of the offending. However, we consider a sentence of five years' imprisonment in Mr Hallam's case to be manifestly excessive.

86. The sentences upheld, after a trial, in *Trowland* were three years' imprisonment (Mr Trowland) and two years and seven months' imprisonment (Mr Decker). These were said to be severe, but not manifestly excessive (see *Trowland* at [91]). Mr Hallam's case was worse. The intended effect was worse. The period of disruption was longer, spanning over four days, all in accordance with (although falling short of) the intentions

of this sophisticated conspiracy. However, in this case, as in all cases, it is necessary to pass the shortest possible sentence commensurate with the seriousness of the offence (s. 231(2) of the Sentencing Act 2020). Deterrence was a particularly important factor in Mr Hallam's case, because he had eleven relevant previous convictions at the date of the conspiracy in 2022. By the date of sentence he had also been convicted of a further offence for which he had received a suspended sentence in 2024. Nevertheless, this was his first sentence of immediate custody. It is also necessary to avoid sentence inflation.

87. We take account of all of the matters considered by the judge when passing sentence and we also recognise that some attention must be paid to conscientious motivation and Articles 10 and 11, although much less than would have been the case had the offending been less disproportionate. We consider that the shortest term commensurate with the seriousness of the offence in the case of Mr Hallam was one of four years' imprisonment, not five.

(3)(d) The M25 Conspiracy Case: Daniel Shaw

88. No particular argument was addressed to us in respect of Mr Shaw which did not apply equally to Mr Hallam. Mr Shaw, like Mr Hallam, was entitled to have his culpability considered in the light of his conscientious motivation and to have a final assessment made as to whether the sentence to be passed on him was proportionate to any interference with his ECHR rights. The sentence also had to be the shortest sentence commensurate with the seriousness of the offence.

89. The judge considered that Mr Shaw's sentence should be four years' imprisonment, which was one year shorter than the sentence originally passed on Mr Hallam. It follows, from our reduction of Mr Hallam's sentence from five years' to four years' imprisonment, that Mr Shaw's sentence should not have exceeded three years' imprisonment, which maintains the differential between him and Mr Hallam. We see no reason for any further reduction.

(3)(e) The M25 Conspiracy Case: Lucia Whittaker de Abreu

90. Ms Whittaker de Abreu is entitled to the benefit of the points already discussed above.

91. It was, in addition, submitted that the judge had failed properly to take into account her caring responsibilities. However, he expressly referred to them, saying "I bear in mind what I have seen and heard about your health and your caring responsibilities, but that provides little by way of mitigation, given you[r] conscious choice to engage in offending of this seriousness". We are not persuaded, either by the evidence of these matters put before the judge or by an additional statement from her mother (whose initial statement was before the sentencing judge), that a further reduction in her sentence was required on that account. The seriousness of the offence made an immediate custodial sentence inevitable and Ms Whittaker de Abreu's caring responsibilities were not such as materially to affect the appropriate length of the sentence.

92. It was submitted that the trial judge wrongly evaluated Ms Whittaker de Abreu's risk of reoffending. The judge was of course well-placed after trial to assess Ms Whittaker de Abreu's risk of reoffending. He referred to the fact that she had not disrupted the

trial, as had her co-defendants, but considered that this made no difference to the appropriate sentence. He made no mention of the fact that she had not reoffended or been convicted of any further matters since November 2022, again a point of distinction to be made between Ms Whittaker de Abreu and Ms Lancaster, Mr Hallam and Ms Gethin.

93. We consider that a sentence of four years' imprisonment for Ms Whittaker de Abreu was manifestly excessive and that the appropriate sentence in her case is is 30 months' imprisonment. This reflects the parity found by the judge between her sentence and that of Mr Shaw but makes additional adjustment downwards to reflect the additional mitigation in her favour as referred to above.

(3)(f) The M25 Conspiracy Case: Louise Lancaster

94. No specific personal mitigation was advanced before us in respect of Ms Lancaster. The arguments already considered in relation to other appellants apply also to her. For the same reasons, her sentence will be reduced from four years' imprisonment to three years' imprisonment.

(3)(g) The M25 Conspiracy Case: Cressida Gethin

95. The sentencing judge did not distinguish between Ms Gethin's sentence and the sentences passed on Mr Shaw, Ms Whittaker de Abreu, and Ms Lancaster.

96. A striking difference between her and her co-defendants was her age. She was only 20 years old at the date of the conspiracy offence in late 2022. At the time of the conspiracy offence in 2022, she had only been convicted of one previous matter, an aggravated trespass committed earlier in the same year.

97. The judge acknowledged her age, but said it did not provide any mitigation or entitle her to a shorter sentence than the sentences passed on Mr Shaw, Ms Whittaker de Abreu or Ms Lancaster. He assessed her as "highly intelligent and well-educated" and said that neither immaturity nor personal disadvantage had, as he put it, driven her to crime.

98. The question was whether Ms Gethin's age supported a submission that she lacked maturity, which in turn reduced her culpability. Intelligence and educational attainment are not the same as maturity. Consideration of the possible relevance of immaturity is necessary even in the case of a young adult who has passed the age at which the Guideline on Sentencing Children and Young People applies. As was stated in *Clarke* [2018] 1 Cr. App. R. (S.) 52; [2018] EWCA Crim 185 at [5]:

> "Reaching the age of 18 has many legal consequences, but it does not present a cliff edge for the purposes of sentencing. So much has long been clear. The discussion in *R. v Peters* [2005] EWCA Crim 605; [2005] 2 Cr. App. R. (S.) 101 (p.627) is an example of its application: see [10]–[12]. Full maturity and all the attributes of adulthood are not magically conferred on young people on their 18th birthdays. Experience of life reflected in scientific research (e.g. The Age of Adolescence: thelancet.com/child-adolescent; 17 January 2018) is that young people continue to mature, albeit at different rates, for some time beyond their 18th birthdays. The youth and maturity of an offender will be factors that inform

> any sentencing decision, even if an offender has passed his or her 18th birthday."

99. We accept the submission that Ms Gethin's immaturity lowered her culpability and that her sentence should be lower than that of her co-defendants accordingly. We reduce her sentence from four years to 30 months' imprisonment.

(4) The M25 Gantry Climbers Case

(4)(a) The Judge's Sentencing Remarks in the M25 Gantry Climbers Case

100. All the appellants in the M25 Gantry Climbers case pleaded guilty as their trial was about to begin. A jury had been empanelled. They were sentenced by HHJ Collery KC on 1 August 2024. Daniel Johnson was sentenced at the same time as the appellants but he has not applied for leave to appeal against his sentence. The judge said that Mr Johnson "led the defendants in their change of pleas and others followed his lead". He gave a 10% reduction in sentence to each defendant as credit for plea and there is no challenge to that.

101. In his sentencing remarks, the judge said that the M25 had been chosen specifically because it is one of the most important parts of the strategic road network and action upon it was likely to cause maximum disruption.

102. The M25 gantry climbers had travelled long distances to take part in the disruption. Between them, they climbed six gantries over the M25 in a broad swathe from St Albans to Sevenoaks. Each had been trained to climb the gantries. Each had been equipped with climbing equipment. Many of them (but not Gaie Delap and Paul Sousek) brought locks and glue to delay their removal. The purpose of climbing the gantries was to delay their removal from the road and thereby prolong the period of road closure and increase the disruption. The purpose of the disruption was so that Just Stop Oil might benefit from media coverage, but the nuisance caused was intended, and not merely a by-product of the disruption.

103. The climbers were acting together and were sentenced on that basis. However, unlike the M25 conspirators led by Mr Hallam, the M25 gantry climbers were "the willing volunteers" rather than "the organisers".

104. The judge noted that there was no guideline for sentencing offences of intentionally causing a public nuisance under s. 78(1). However, he referred to *Trowland,* to the guidelines on overarching principles and on imposition of community and custodial sentences and to the purposes of sentencing in s. 57 of the Sentencing Act 2020.

105. He found both individual and collective culpability to be high. There was sophisticated planning. The actions of the M25 gantry climbers were part of a wider action. The intention was to be part of a co-ordinated effort. Every defendant took steps to make it harder for them to be brought down and so to prolong the disruption.

106. The harm intended and achieved on 9 November 2022 was mass disruption for several hours. 117,000 vehicles were impacted. There were 8,936 hours of vehicle delays, ranging from minutes in some cases to hours in others. Police costs for the Metropolitan Police alone were in excess of £227,000 and involved 44 shifts.

107. The judge considered the appellants' conscientious motivation and said this:

> "The court accepts, of course, that a conscientious motive may be a relevant consideration, particularly where, otherwise, the offender is a law-abiding person. You committed offences simply by being on the motorway. You actions were, in the view of this court, disproportionate to your aims. I do not regard your status as non-violent protesters to afford you any particular mitigation. The very purpose of section 78 was to address the increase in non-violent protest offending. In *Trowland and Decker* [Lady] Justice Carr said, at paragraph 50:
>
> > "However, the more disproportionate or extreme the action taken by the protester, the less obvious is the justification for reduced culpability and the more lenient sentencing."
>
> In my view, because the actions of these protesters was disproportionate – and deliberately intended to be so – consequently the moral difference between your behaviours and that of ordinary law breakers is much reduced."

108. Considering the cases overall, the judge said:

> "I take the view that, in relation to each of you, the custody threshold has been passed, that in none of your cases is the objective of deterrence achieved by the imposition of a community sentence. Such anti-social mass disruption is deserving of punishment. The sentences I pass are the least possible in the circumstances.
> (…)
> I had in mind, when considering these offences, a period of 27 months imprisonment, marginally more for some given the various aggravating factors. That then has to be adjusted to reflect the various mitigating factors in each of your cases."

(4)(a)(i) Gaie Delap

109. Sentencing Ms Delap (aged 75 at the time of offending), the judge said that she had no previous convictions, but one conditional caution in 2020 for wilful obstruction of the highway. He treated as an aggravating factor her being on bail for another protest matter when committing the current offence. He noted that she was the oldest of the defendants, but said, "age, I regret, has not brought wisdom".

110. He accepted her conscientious motivation. He rejected her expressions of regret for the disruption caused as implausible. He accepted her life of service to others before and after retirement as a teacher and some personal health and family caring responsibilities, albeit at a relatively low level.

111. She had been made subject to a qualifying curfew from 10 November 2022 but the tag could not be fitted and that requirement was removed on 8 December. He certified that 14 days were to count towards her sentence, namely half of 28 days.

112. He reduced the sentence to reflect her personal mitigation and general health. With 10% credit for plea, her sentence was 20 months' imprisonment, reduced by 14 days in respect of the time which she had spent on qualifying curfew.

(4)(a)(ii) Paul Sousek

113. Sentencing Mr Sousek (aged 71 at the time of offending), the judge noted his history of protest and his desire to cause public nuisance and large-scale disruption to increase the chance of news coverage. There was no remorse and no intention of changing his behaviour, save to stop short of the point of arrest. He was closer to the centre of the actions than other defendants. The judge said, "you are old enough to know better but do not". He had been the most recalcitrant at court hearings. He also had health issues.

114. He had three previous convictions, two of great age and no obvious relevance. One, however, was in 2022 for protest-related public nuisance, punished by a fine.

115. The judge reduced the sentence for personal mitigation, namely, Mr Sousek's age and state of health. After 10% credit for plea, his sentence was 20 months' imprisonment, with 86 days from the tagged curfew to count towards that.

(4)(a)(iii) Theresa Higginson

116. Sentencing Theresa Higginson (aged 24 at the time of offending), the judge noted one previous conviction for aggravated trespass in 2023 for which she had received a 6 month conditional discharge. The judge understood her to have been on bail for that at the time of the current offence. He said she was, in fact, on bail for two protest-related offences at the time of the current offending, which was an aggravating feature.

117. She was unrepentant and assessed in the pre-sentence report as highly likely to reoffend. She was intellectually able and had choices and opportunities not available to others. There was no significant personal mitigation.

118. Her sentence, after 10% credit for plea, was 24 months' imprisonment. Half of the time spent on qualifying curfew counted towards that.

(4)(a)(iv) Paul Bell

119. Sentencing Paul Bell (aged 22 at the time of offending), the judge noted he had no previous convictions. This was treated as a mitigating feature, reducing the sentence. However, he was on court bail at the time of sentence for two protest-related matters for which he was still awaiting trial, which the judge treated as an aggravating feature.

120. He had an academic career, but had prioritised his Just Stop Oil activity, including the offending, over that.

121. After 10% credit for pleading guilty, he was sentenced to 22 months' imprisonment. The judge gave 78 days' credit for a qualifying curfew.

(4)(a)(v) George Simonson

122. Sentencing George Simonson (aged 22 at the time of offending), the judge noted his conscientious motivation. He rejected the submission that Mr Simonson's attitude to offending had changed and pointed to his two arrests and convictions after the offence in question. He noted a suggestion, although short of a diagnosis, of possible ADHD or autism. Mr Simonson was described as an intelligent, thoughtful and considerate young man.

123. He had three recent and relevant previous convictions for public order and highway obstruction offences, two dealt with by a fine and one resulting in a 12-month conditional discharge. He was on bail for that at the time of offending.

124. After 10% credit for pleading guilty, his sentence was 24 months' imprisonment.

(4)(b) General Issues in the M25 Gantry Climbers Case

125. We apply the principles identified above. It is clear that the judge both recognised and took into account in the case of each defendant their conscientious motivation. He was correct to do so. We are not persuaded that any of the sentences are manifestly excessive in that respect or that the engagement of Article 10 and 11 rights, although not specifically mentioned by the judge, called for more lenient sentencing than was already afforded by the judge's recognition of the appellants' conscientious motivation when passing sentence. The offending was serious and out of all proportion with what was necessary for the exercise of Article 10 or Article 11 rights. Both culpability and harm were, on the judge's findings, significant. The balance of factors in the Imposition Guideline made immediate custody appropriate. There was a history of poor compliance with court orders, a risk of reoffending, a limited impact on others, an absence of strong personal mitigation and, in particular, the necessity of appropriate punishment.

126. It was submitted that the suspended sentence of 21 months' imprisonment imposed on the appellants' co-defendant, Mr Johnson, created a disparity with the appellants' sentences which was not justified. In particular, it was submitted that the judge wrongly emphasised Mr Johnson's disavowal of Just Stop Oil and, thereby, wrongly penalised the appellants for continuing their commitment to the environmental cause of Just Stop Oil and those aspects of its work which are not illegal.

127. The judge's sentencing remarks about Mr Johnson, however, clearly demonstrated why it was legitimate to suspend Mr Johnson's sentence. He was 25 years old and had no previous convictions. He was under investigation, but not on bail for any matters, and the matters under investigation resulted in no action. His involvement with Just Stop Oil was very brief, covering only the period from October to November 2022. He had shown genuine remorse, which was noted in his pre-sentence report and accepted by the judge. He had also disassociated from Just Stop Oil and severed those ties. His engagement with the criminal justice system had already served to deter him from further offending and he intended to pursue post-graduate studies towards a profession (as a psychoanalyst), as to which he had an academic reference in support. In relation to the Imposition Guideline factors, therefore, there was no history of poor compliance with court orders, he presented no risk to the public, there were very strong prospects of rehabilitation and he had personal mitigation in the form of his career prospects, which would be blighted if he went to prison instead of continuing his studies. The offending remained serious, which meant that the custody threshold was crossed, but his position was very different in multiple respects from that of the appellants. This makes the disparity argument unsustainable.

128. We do not think that it is a fair reading of the sentencing remarks to say that the appellants were penalised for continuing their conscientious commitment to Just Stop Oil. Rather, the focus of the judge's remarks was on Mr Johnson's genuine remorse and his decision not to re-offend and, in the case of the appellants, on their lack of genuine

remorse and their risk of re-offending. That was a legitimate judgment to make in respect of the appellants and one which was open to the judge on the materials which he had before him and for the reasons which he gave. He said, in terms, that the continued commitment of the appellants to their cause "is, of course, in itself unobjectionable".

(4)(c) The M25 Gantry Climbers Case: Gaie Delap

129. In relation to Ms Delap, passages in the Pre-Sentence Report were highlighted in which she said that she understood that she must stay within the law in any future involvement with Just Stop Oil. However, the judge was not bound to accept that self-serving assurance and he pointed to reasons, based on the facts of her offending, which made her account of her offending and of her intentions implausible.

130. It was pointed out that the judge was told incorrectly that she was on bail when committing the current offence. In fact, she had been released under investigation for gluing herself to a road. Taking the matters referred to by the judge in reaching his sentence as a whole, and having regard to the final sentence, we do not regard that difference as material. Her sentence of 20 months' imprisonment was lower than the sentence on any of the other appellants, except Mr Sousek, whose sentence was the same. He too was not in breach of bail or of any orders when offending.

131. The judge took Ms Delap's age and other personal mitigation into account, as well as her conscientious motivation. We do not consider the sentence of 20 months' imprisonment to be manifestly excessive or wrong in principle.

132. However, it seems that the judge was not given full or correct information about Ms Delap's curfew. He certified that 14 days counted towards her sentence on account of a short period of time spent on qualifying curfew. However, her qualifying curfew ended because she suffered from a medical condition, which made it necessary to remove the tag for health reasons. Thereafter, although not tagged, she continued to be under a curfew from 7 pm to 7 am for a further 145 days.

133. Our attention was drawn to *R v Whitehouse* [2019] EWCA Crim 970; [2019] CRAppR (S) 48 at [16] to [19] and we drew the parties' attention to *R v Nwankwo* [2024] EWCA Crim 1375 at [19] to [20]. The fact that Ms Delap was subject to onerous bail conditions for so long was something which should have been taken into account when she was sentenced. This issue was not raised in the original grounds of appeal, but, when raised during the hearing, the Crown accepted that account should have been taken of this period of curfew. We accept that, on the facts of her case, it is appropriate to give her some credit for the onerous bail conditions to which she was subject. The position is different in relation to the shorter curfew (from midnight to 7 am) which applied thereafter.

134. We consider that the appropriate adjustment to the sentence is two months. Ms Delap's sentence will be reduced from 20 months' to 18 months' imprisonment accordingly.

(4)(d) The M25 Gantry Climbers Case: Paul Sousek

135. In addition to the points already considered, it was submitted on behalf of Mr Sousek that the judge failed to have sufficient regard to his age and state of health. However,

the judge specifically referred to these factors when reaching his decision on sentence. We are not persuaded that the sentence of 20 months' imprisonment after credit for plea was manifestly excessive or wrong in principle.

(4)(e) The M25 Gantry Climbers Case: Theresa Higginson

136. No grounds additional to those which we have already considered were advanced in respect of Ms Higginson. For the reasons already discussed, we dismiss her appeal against her sentence of 24 months' imprisonment.

(4)(f) The M25 Gantry Climbers Case: Paul Bell

137. In addition to the grounds already considered, it was argued on behalf of Mr Bell that his age (22 at the time of offending), good character and short period in prison on remand (39 days) required a shorter sentence and that the sentence ought in any event to have been suspended.

138. The judge recognised his good character as a mitigating feature which shortened his sentence. He was of full age and there was no suggestion of immaturity in his case. The sentence of 22 months was neither manifestly excessive nor wrong in principle. In addition to the seriousness of the offending, immediate custody was justified by the lack of positive material to suggest a realistic prospect of rehabilitation. Age could not demonstrate that by itself.

(4)(g) The M25 Gantry Climbers Case: George Simonson

139. On behalf of Mr Simonson, it was argued that the judge failed to have sufficient regard to his young age, offending background and personal mitigation. It was submitted that the judge was wrong not to find that he was remorseful, notwithstanding the commission of further offences. It was submitted that Mr Simonson's assessment of the offending in what was described as "granular detail" was a mitigating rather than an aggravating feature.

140. Mr Simonson was 22 at the time of offending. However, he was not only intelligent, but thoughtful. His actions were not impulsive or isolated. There was nothing to suggest reduced culpability by reason of immaturity. The reference to Mr Simonson thinking through "in granular detail", in advance, the organised plan to cause disruption and lengthy delays was a quotation of his own words and such deliberate, premeditated, planned action was clearly not a mitigating feature. The judge was entitled to reject the claim of remorse, not least because there was similar offending both before and after the current offence.

141. It was pointed out that Mr Simonson was not on bail at the time of the offence, contrary to the information given to the judge. He was arrested and bailed for just over three weeks and then released under investigation, which was the position when he committed the current offence. We do not regard that as materially affecting the reasoning of the judge, nor does it persuade us that his sentence was manifestly excessive or wrong in principle. We dismiss the appeal against his sentence of 24 months' imprisonment.

(5) The Thurrock Tunnels Case

(5)(a) The Judge's Sentencing Remarks in the Thurrock Tunnels Case

142. The Navigator oil terminal and the adjacent industrial estate are situated in an area of land which is bounded to the south and east by the river Thames, to the west by the M25 motorway and to the north by a railway line. Only two roads, St Clements Way and Stoneness Road, provide access to the industrial estate and the oil terminal. On 23 August 2022 Just Stop Oil protesters blocked St Clements Way. When they were removed, they disclosed the existence of two tunnels, one under St Clements Way (tunnel 1) and the other under Stoneness Road (tunnel 2).

143. Tunnel 1 was occupied until 4 September 2022 by Samuel Johnson, Joe Howlett and Xavier Gonzalez-Trimmer. (Mr Gonzalez-Trimmer did not stand trial, having, sadly, taken his own life in February 2024.) St Clements Way was fully closed for about 2 hours on 23 August 2022, after which one lane was reopened and a contraflow system operated.

144. Tunnel 2 was occupied by Dr Larch Maxey until 28 August 2022 and by Chris Bennett until 29 August 2022. (Autumn Sunshine Wharrie was also involved with, but did not occupy, tunnel 2. She was tried and convicted but has not sought leave to appeal against her sentence, which was suspended.) Stoneness Road was closed for 6 days, from about 12.30 pm on 23 August 2022 to about 2.10 pm on 29 August 2022, when Mr Bennett left the tunnel.

145. HHJ Graham presided over the five-week trial, at which there was extensive evidence as to the effect of the road closures on businesses at the industrial estate and the oil terminal. The judge said as follows:

> "The effect of this was considerable. It meant that access to the industrial estate was severely limited. It meant that businesses were not able to operate normally. It meant that personal matters also were caused inconvenience to members of the public who were using it there and as a result several hundred thousand pounds worth of loss was occasioned and a large amount of inconvenience to members of the public.
> This, in my judgment, was of a different and more serious level than those who sit in roads or even climb up on bridges because this actually involved damage underneath the road. It involved a considerable degree of planning and execution and the danger was that if these road[s] had actually collapsed, either of them, then there could have been severe damage caused or even injury and death. There was a particularly chilling piece of evidence from, I think, a fire officer who said that after he had visited the tunnel he was satisfied if the tunnel had collapsed he would be dealing with a recovery rather than saving people."

146. There was an issue at trial whether the appellants intended to cause serious harm just to those travelling to and from the oil terminal or to those travelling to and from both the oil terminal and the industrial estate. In his sentencing remarks, the judge said as follows:

i) "… this was a very serious attempt to completely disrupt the industrial area around an oil terminal.";

ii) "That road also gave access to a considerable industrial estate and the clear intention was to make that road unsafe so that it would have to be closed and that access to and from the oil terminal and the industrial estate would be impeded if not stopped.";

iii) "I accept that the main object of this operation was the oil terminal. If the oil terminal had not been there, this operation would not have taken place where it did and I accept therefore that the inconvenience and the nuisance caused to others apart from the oil terminal was by way of collateral damage but the actual damage that was caused, the actual nuisance that was caused, the actual inconvenience and costs that were caused, directly arose from these defendants' actions in digging these two tunnels."

147. After referring to the role played by the individual defendants and their personal mitigation, the judge referred to *Trowland* and said as follows (emphases added):

> "And the Court of Appeal, in my view, set out to say the approach that judges should take to these matters and start by pointing that the Sentencing Council guideline does not exist but that the custodial sentence available is up to 10 years and the Court of Appeal first of all dealt with matters of Article 10 and Article 11 of the European Convention on Human Rights, says that those should be taken into account but points out that the appropriate sentence would be very fact-sensitive according to place.
> I must say, I find Articles 10 and 11 have very little application to this case. There was no restriction on these defendants associating with each other. There is no restriction on these defendants putting their point of view forward. What this case is about is damage to the road structure and placing a - a risk such that roads had to be closed. It is, in that sense, more serious than the case the Court of Appeal considered because that just involved people climbing on bridges and disrupting traffic in that way and this case, the case I am dealing with, there was actual physical damage caused and physical damage which would, in unfortunate circumstances, have led to substantial damage or even injury and death.
> The Court of Appeal specifically rejected a submission that because this was a conscientious demonstration that non-custodial sentences were appropriate. That was rejected and the court said there are no bright lines in protest cases; rather whether or not a custodial sentence was justified turns on the individual facts.
> It talked about the matter of conscientious motive. That again is, the Court of Appeal said, a court could properly take into account but again in this case, in my judgment, that is of very limited influence given the nature of the activity which was undertaken and given that the actual offence here arose from the deliberate causation of damage to an area of the public road."

148. The judge also said as follows in relation to *Trowland*:

> "And the [court] came to the conclusion that the judge was entitled to find the protesters' culpability to be high and that the effect of the obstruction was significant and the court in fact described it as being of the utmost seriousness, affecting a strategic road network.

> Well, in this case, the culpability again must be seen as being high and the effect of the actions here again can only be described of being of the utmost seriousness and so the Court of Appeal concluded that the sentences passed by Collery HHJ KC of three years and just slightly less than three years were described as striking a fair balance and were not disproportionate."

(5)(b) General Issues in the Thurrock Tunnels Case

149. It was submitted that i) the judge's statement that conscientious motivation was of very limited influence meant that he had failed to take it into account at all; and ii) his statement that Articles 10 and 11 had very little application to the case meant that he had failed to take them into account either. However, we consider that these statements, which have to be read in the context of the judge's careful account of the decision in *Trowland*, are to be understood as indicating that the judge did, in accordance with that decision, have regard both to the appellants' conscientious motivation and to their ECHR rights, but decided, in the light of the facts of the case, to accord relatively little weight to these considerations. Notwithstanding their conscientious motivation, the judge concluded, as he was entitled to, that the appellants' culpability was high.

150. The judge also made it clear that he had considered the length of the sentences imposed in *Trowland*. In that respect, we note that the sentences imposed on Mr Bennett, Mr Johnson and Mr Howlett were significantly shorter than the sentences imposed in *Trowland* and that the sentence imposed on Dr Maxey was no longer than the sentence imposed on Mr Trowland.

151. Mr Chada submitted that the judge found that the appellants' intention was limited to causing disruption to the oil terminal and that the disruption caused to the occupants of the industrial estate was merely collateral damage. We do not accept that submission. The judge accepted that the oil terminal was the main object of the operation, but he also said that this was an attempt to disrupt the industrial area around the oil terminal and that the clear intention was to make the road unsafe so that it would have to be closed and that access to and from the oil terminal and the industrial estate would be impeded, if not stopped. One witness's unchallenged evidence was that only one in ten of the vehicles using the roads under which the tunnels were dug was connected with the oil terminal.

152. It was submitted on behalf of each appellant that the judge paid insufficient regard to his personal mitigation, which we will consider separately for each appellant. However, we note that each of the appellants relied on the effect which Mr Gonzalez-Trimmer's death had had on him as a mitigating factor.

(5)(c) The Thurrock Tunnels Case: Chris Bennett

153. Mr Bennett was 31 at the time of the offence. The judge said as follows about Mr Bennett's role in the offending, his previous convictions and his mitigation:

i) "As far as Mr Bennett is concerned, he had travelled from Bristol and was in tunnel 1 for a total of 12 days and spoke to Dr Maxey during the course of that time. He stayed there even after Ms Wharrie had been arrested and after Mr Maxey had been arrested."

ii) "The defendant Bennett has a conviction for aggravated trespass on land from 2022."

iii) "Mr Bennett says he now has remorse for the damage to the wider community, that he was not the architect of the plan, not an organiser. I have regard to the character evidence which has been uploaded onto the DCS. He is a carer now for those with dementia and has given up activism."

iv) "You played again a significant part in this very serious offending."

154. Mr Bennett's previous conviction involved him tying himself to a tanker at the Navigator oil terminal as part of a Just Stop Oil protest, which resulted in him being fined £400. He had not offended since August 2022. The character references mentioned by the judge included reference to Mr Bennett's intention not to engage with any further disruptive protests.

155. We do not consider that the sentence of 18 months' imprisonment imposed on Mr Bennett was manifestly excessive or wrong in principle. The judge was entitled to assess his culpability as high, notwithstanding his conscientious motivation, and the harm caused was clearly very high. The judge took account of all of the mitigating factors and we do not consider that they required him to impose a shorter sentence. The judge was also entitled to take the view that appropriate punishment could only be achieved by immediate custody. For these reasons, we dismiss Mr Bennett's appeal.

(5)(d) The Thurrock Tunnels Case: Dr Larch Maxey

156. Dr Maxey was 50 at the time of the offence. The judge said as follows in relation to Dr Maxey's role, his previous convictions and his mitigation:

i) "Larch Maxey is the oldest of the male defendants. He is described in the prosecution notes as highly intelligent. He has a background with Just Stop Oil and has a number of previous convictions. He broadcast saying that he was intending to stay in the tunnel and indeed chained himself to the tunnel to stop him being removed."

ii) "As I've already said, Dr Maxey has a number of previous convictions, all of a similar nature. In 2021, he was convicted of aggravated trespass on land and received a suspended sentence. In 2023, he was convicted of a conspiracy to cause a public nuisance under the old common law and received another suspended sentence."

iii) "As far as Larch Maxey is concerned, there are also character references. I am reminded that his involvement in this case through conscientious motivation and Mr [Chada] points me to the European Convention on Human Rights and he says he was not the organiser and as far as his present personal circumstances are concerned, he has caring responsibility for an elderly father, that he has changed his approach to climate change issues and in more personal matters he has been diagnosed as being bipolar and has been severely affected by the death of the co-accused, Mr Trimmer. He's now been out of trouble for two years."

iv) "You were clearly heavily and seriously involved in this very serious offending. You have a lot of convictions for similar offending."

157. As for Dr Maxey's previous offending:

i) In September 2019 Dr Maxey was one of those who used drones to disrupt Heathrow Airport.

ii) On 6 October 2020 Dr Maxey entered an HS2 construction site and climbed a tree. On 6 October 2021 he was given a conditional discharge for 15 months for the offence of aggravated trespass. It follows that he was subject to a conditional discharge when he committed this offence.

iii) For three weeks in January and February 2021 Dr Maxey occupied a tunnel under land related to the HS2 development, for which he was sentenced on 1 August 2023 to 3 months' imprisonment, suspended for 12 months.

iv) On 6 May 2021 Dr Maxey spray-painted a building and smashed its windows, for which he was sentenced on 30 January 2023 to 15 weeks' imprisonment for the offence of criminal damage. He was deemed to have served this sentence by reason of the time which he had spent on a qualifying curfew.

158. Interviewed in a YouTube video, the purpose of which was to recruit volunteers to his cause, Dr Maxey said, amongst other things:

> "… we need to cause an intolerable level of disruption, absolutely intolerable. If it's not intolerable, we'll fail...
> "… what's really needed is economic disruption, so if people take action in a range of ways which helps to contribute towards that pressure for change then we can, we can win, yeah.
> "… this is something I've chosen to give my life to and it's the most rewarding thing I've ever done."

159. Dr Maxey recorded messages which were broadcast on the internet during his occupation of tunnel 2. When St Clements Way was partially reopened, he demanded that it be closed.

160. Several positive character references mentioned that Dr Maxey had moved away from illegal and disruptive action. In a letter to the judge, Dr Maxey expressed his remorse and his intention not to take any disruptive action in future and gave details of his caring responsibilities for his parents and his son and his mental health, having been diagnosed with bipolar disorder in August 2023. A medical report stated that Dr Maxey's condition could have led to poor impulse control, disinhibition and reckless behaviour and also expressed the opinion that imprisonment would interrupt his therapy and give rise to a risk of self-harm.

161. In addition to the submission that the judge paid insufficient regard to the mitigating factors, it was also submitted that there was a disparity between the sentence of 3 years' imprisonment imposed on Dr Maxey and the sentences imposed on the other appellants in the Thurrock Tunnels case.

162. However, we do not consider that the sentence was manifestly excessive or wrong in principle. Dr Maxey's broadcasting activities indicate the leading role which he played, occupying tunnel 2 and thereby causing Stoneness Road to be closed for 5 days. There was no convincing evidence that his bipolar disorder affected his culpability, which was high, as was the harm caused. There were a number of mitigating factors, but these were considerably outweighed by Dr Maxey's history of similar offending in the three years preceding this offence, making it appropriate that his sentence should be significantly longer than those imposed on the other appellants in the Thurrock Tunnels case. We dismiss Dr Maxey's appeal.

(5)(e) The Thurrock Tunnels Case: Samuel Johnson

163. Mr Johnson was 39 at the time of his offence. The judge said as follows in relation to Mr Johnson's role and his mitigation:

i) "As far as Samuel Johnson is concerned, he was also a spokesman for the Just Stop Oil protesters. He had actually attended a tunnelling training session so he was well prepared for this operation. He had been there as early as late July and stayed there until the 4th of September and he complained that when the partial opening of the road over tunnel 1 had happened he demanded that it be closed again."

ii) "As far as Johnson is concerned, I am told that he has moved away from activism, he has cut ties with Just Stop Oil, he is undertaking more positive activities, has a new partner and a close relationship with his sister and his nephew."

iii) "I see no reason to distinguish between you and Chris Bennett."

164. Mr Johnson gave up a career in construction to become involved in climate activism. He used his construction skills in digging the tunnel. Like Dr Maxey, he demanded that St Clements Way be closed when it was partially reopened.

165. He had been convicted of an offence of obstructing the highway committed on 4 October 2021, for which he received a fine on 6 May 2022. He had committed no offences since August 2022. There were a number of character references. It was submitted on his behalf that he had moved away from Just Stop Oil and from direct action protesting, engaging instead with a political party, and he wrote a letter to the judge in which he apologised for the disruption he had caused. However, the pre-sentence report stated that Mr Johnson maintained that his actions were justified and proportionate. The author of the report stated that Mr Johnson's opinions were unlikely to change.

166. We consider that the judge was entitled to conclude that there was no reason to distinguish between Mr Johnson and Mr Bennett. We dismiss Mr Johnson's appeal against his sentence of 18 months' imprisonment for substantially the same reasons as in Mr Bennett's case.

(5)(f) The Thurrock Tunnels Case: Joe Howlett

167. Mr Howlett was 32 at the time of his offence. The judge said as follows in relation to Mr Howlett's role and his mitigation:

i) "Joe Howlett is 32 years of age now, I believe. He also had been on a tunnelling training camp. He arrived there on the [20th] of August, returned on the 22nd of August, and he occupied tunnel - tunnel 1 until the 4th of September.";

ii) "As far as Howlett is concerned, he has no previous convictions. He acted out of conscientious motivation. I have seen character references in … relation to him. He is a talented musician and is once again involved in music and is trying to obtain qualification as a teaching assistant with a possibility of going abroad to pursue that.";

iii) "… I can draw a small distinction in your case because you have no previous convictions."

168. There were several character references. The Pre-Sentence Report recorded that Mr Howlett denied that he had intended to cause any harm at all. It also said that he claimed that he had been lied to about the impact which there would be on local businesses, although it also said that this seemed rather naïve. The Pre-Sentence Report also stated that Mr Howlett had expressed genuine remorse for the public and businesses who had been impacted by his actions and that he had no intention of being involved in further action of this nature, although he still had an interest in the subject matter.

169. The sentence imposed on Mr Howlett was in line with the sentences imposed on Mr Bennett and Mr Johnson, but was 3 months shorter because, unlike them, Mr Howlett had no previous convictions. We consider that this was an appropriate course for the judge to take and we dismiss Mr Howlett's appeal against his sentence of 15 months' imprisonment for substantially the same reasons as in the cases of Mr Bennett and Mr Johnson.

(6) The Sunflowers Case

(6)(a) The Judge's Ruling and Sentencing Remarks in the Sunflowers Case

170. On 13 October 2022 Ms Plummer and Mx Holland entered the National Gallery in preparation for what they were planning to do on the following day. When they returned on 14 October 2022 they each had with them a tin of tomato soup and some glue. They were wearing Just Stop Oil T-shirts under their outer clothing. They entered the gallery where the painting Sunflowers was on display. They removed their outer clothing to reveal the Just Stop Oil logos on their t-shirts. They threw the soup at the painting. They glued themselves to the wall. They were filmed and the film was soon posted on social media. Ms Plummer said "What is worth more, art or life?" She also said that fuel is unaffordable to millions of hungry families who cannot afford to heat a tin of soup.

171. Staff inspected the painting and its antique frame. The painting was protected by glass and fortunately had not been damaged. The frame sustained damage which was estimated at £8,000 to £10,000. The painting was put back on display after about 6 hours.

172. HHJ Hehir presided over the trial, which lasted for 4 days. We have already dealt (in paragraphs 37 to 42 above) with the ruling which he made during the trial. In his sentencing remarks, he said as follows about the potential harm to the painting:

> "However, it is not the value of the damage caused to the frame that is the most serious aspect of your offending. If the protective screen over the canvas had not done its job, the painting itself, Sunflowers, could have been seriously damaged or even destroyed.
> The stance of each of you at trial was a blithe dismissal of the risks involved in what you did. You each asserted that, as far as you as you were concerned, there was never any risk to the canvas because it was covered by a glass screen. But neither of you could be sure that the screen would actually protect the painting from the soup. Tellingly, the gallery staff were not sure either. At trial, the jury heard most vivid evidence of how they immediately checked whether the picture itself had been damaged. For all they knew, soup might have seeped through the glass and got onto the canvas. And you were exactly the same position.
> As Larry Keith, the head of conservation at the National Gallery, said in his evidence, had any liquid got through and made the canvas wet, the consequences could have been very serious. If anything, that is an understatement.
> Each of you claimed in evidence to care about and value Sunflowers. I reject that evidence. My assessments, having heard all the evidence about what happened, including your role, is that you could not have cared less whether the painting itself was damaged or not. I have no doubt that the publicity you each craved would have been even greater if it had."

173. Having noted that Sunflowers was literally priceless and part of humanity's shared cultural treasure, the judge added:

> "You two simply had no right to do what you did to Sunflowers, and your arrogance in thinking otherwise deserves the strongest condemnation. The pair of you came within the thickness of a pane of glass of irreparably damaging or even destroying this priceless treasure. That must be reflected in the sentences I pass.
> Section 63 of the Sentencing Code requires me, in assessing the seriousness of your offending, to consider not only the harm your offence caused, but also the harm it might foreseeably have caused. For the reasons I have explained, that foreseeable harm is incalculable."

174. The judge placed the offence in category A1 in the offence-specific Guideline, saying:

> "My assessment is that your culpability is at level A, as your offending involved a very high degree of premeditation and planning. You did not act alone. Others within Just Stop Oil were involved in the conception and execution of what you two did. You paid a previous reconnaissance visit to the National Gallery, and you were carrying the soup and glue you needed to make your protest. You spoke to a journalist beforehand, as I have already mentioned, and the filming and the dissemination of what was filmed on social media had also clearly been planned in advance.
> So far as harm is concerned, your offending is in category 1 because of the substantial social impact involved. Any attack on priceless art which is on public

> display can have very harmful societal consequences. Stunts like yours lead to more onerous and intrusive security measures in art galleries and other locations where valuable art and artefacts are on display. That may deter some people from visiting art galleries, museums, and the like. There is even the risk that some treasures might have to be withdrawn from public view altogether."

175. The starting point for a category 1A case is 18 months' imprisonment. The judge said that one of the aggravating factors mentioned in the Guideline was present, in that this was a case of damage to a cultural asset. He said that an uplift to the starting point was required to reflect the harm which could foreseeably have been caused to the painting itself. He added that he did not consider that either the appellants' conscientious motivation or the allegedly non-violent nature of their protest provided any mitigation.

176. After considering the appellants' previous convictions and mitigation, the judge explained that he considered that appropriate punishment could only be achieved by immediate custody.

(6)(b) General Issues in the Sunflowers Case

177. We have already dealt with the questions whether i) account should have been taken in sentencing the appellants of their conscientious motivation (see paragraph 26(1) above) and ii) whether Articles 10 and 11 were engaged in this case (see paragraphs 37 to 42 above). The judge was in error in treating these matters as irrelevant to the sentencing of the appellants. As noted in *Trowland*, however, conscientious motivation is relevant to the assessment of culpability and it does not preclude a finding that that an offender's culpability was high, although each case has to be decided on its own facts.

178. It was said for the appellants that the judge should have placed their offending in category B1 in the Sentencing Council Guideline for Criminal Damage, on the basis that their culpability fell into the medium, rather than the high, culpability category. It was submitted that the planning for the offence was not particularly sophisticated and was more appropriately characterised as "Some planning", rather than "High degree of planning or premeditation".

179. The judge was fully entitled to place this offence in the high culpability category. The appellants devised a plan to carry out a particularly high profile stunt, they conducted reconnaissance, they equipped themselves with what was needed, they spoke to a journalist and they arranged for their activity to be filmed to maximise the attendant publicity. This was much more than just "Some planning".

180. Although it was accepted in the grounds of appeal that harm fell into category 1, it was also submitted that the judge was wrong to have regard to the risk of harm to the painting itself, rather than the actual harm caused to the frame. There were two limbs to this submission. First, it was submitted that there was no evidence that the painting was at risk of damage. This was a factual issue which the trial judge was well placed to assess and we see no reason to disagree with his assessment that the reaction of the gallery staff indicated that they considered that there was a risk of damage to the painting.

181. Secondly, it was submitted that the judge misapplied s. 63 of the Sentencing Act 2020, which provides as follows:

> "Where a court is considering the seriousness of any offence, it must consider—
> (a) the offender's culpability in committing the offence, and
> (b) any harm which the offence—
> (i) caused,
> (ii) was intended to cause, or
> (iii) might foreseeably have caused."

182. It was submitted that s. 63(b)(iii) imposes a wholly subjective test. We do not agree. The use of the word "might" indicates that the question is not whether the defendant did foresee damage, but whether the causing of damage might have been foreseen. That is an objective test. The appellants argue that, because they had seen (during their reconnaissance visit the day before) that the painting was held behind glass, there was no foreseeable harm to the painting. However, knowledge that there was glazing did not mean that potential serious harm to the painting was not foreseeable. There was, for example, no reason to believe, or have any confidence in a belief, that the glazing would provide complete protection for the painting. So much is demonstrated by the fact that, in the immediate aftermath of the attack, museum attendants had great concerns for the painting's safety.

(6)(c) The Sunflowers Case: Phoebe Plummer

183. At the same time as sentencing Ms Plummer for this offence, the judge had to sentence her for an offence of interfering with key national infrastructure, contrary to s. 7 of the Public Order Act 2023, committed on 15 November 2023. This is the offence referred to in *R v Sarti* [2025] EWCA Crim 61. The judge imposed a consecutive sentence of 3 months' imprisonment for that offence. Ms Plummer has not applied for leave to appeal against that sentence.

184. The judge said as follows in relation to Ms Plummer:

> "Phoebe Plummer, you turned 23 yesterday. You were 21 when you committed the offence of criminal damage, and 22 when you committed the offence of interfering with key national infrastructure.
> You are a committed Just Stop Oil activist and have previous convictions and many previous arrests to show for it.
> You committed the slow-walking offence, for which I also have to deal with you, while on bail for the criminal damage matter, and other matters too. Furthermore, you did so in breach of the conditional discharge imposed on you only the previous month for a summary-only public order offence of failing to comply with the conditions for a procession, also in the context of a slow-walking protest. I take no action in respect of that breach, but it is a seriously aggravating feature of your offending on the second matter.
> You clearly have deeply held convictions about climate change and other matters, and you are perfectly entitled to them of course. But you have evidently decided that your beliefs entitle you to commit crimes as and when you feel like it. They do not.
> I have read, with care, the pre-sentence report and other mitigation materials provided to me, all now uploaded to the sentencing section of the relevant digital case file.

> You have represented yourself at the sentencing hearing, as you did at both trials. You delivered your own mitigation. I was treated, if that is the word, to a lengthy exposition of your political and ideological views, not only about climate change but also about a variety of other matters. You are entitled to your views and are not being punished for them. You are being punished for committing criminal offences.
> But I do repeat what I said when I, at one point, interrupted your address to the court. The suggestion that you and others like you, convicted by juries of your peers following fair trials in a democratic state under the rule of law are political prisoners is ludicrous, self-indulgent, and offensive. It is offensive to the many people in other parts of the world who are suffering persecution, imprisonment, and sometimes death for their beliefs, in places where neither democracy nor just laws are to be found. Perhaps one day you will come to realise that, although I fear that day is some way off yet.
> You have no remorse for what you did. Instead, you are proud of it. You made no effort to offer me any actual mitigation. In truth, there is none of any substance in your case."

185. The Pre-Sentence Report stated on the one hand that Ms Plummer appeared to be a vulnerable young person who was easily influenced by others and who displayed deficits in understanding the impact her decisions and choices have on others, but on the other hand that she was a clever young person who was open and honest about the fact that she would continue to protest after her sentencing.

186. We do not consider that Ms Plummer's sentence of 24 months' imprisonment was manifestly excessive or wrong in principle. As we have said, the judge was entitled to place her offence in category A1 in the Guideline. "Damage caused to heritage and/or cultural assets" was an aggravating factor. The sentence imposed was well within the range for a category A1 offence, which carries a custodial range up to 4 years' imprisonment. Ms Plummer was 21 when she committed the offence, but the judge had presided over the trial and was able to assess her level of maturity. She had continued to commit protest offences. Overall, the judge was entitled to conclude that the shortest possible sentence that he could impose was 24 months' imprisonment. He was also entitled to conclude that appropriate punishment could only be achieved by immediate imprisonment.

(6)(d) The Sunflowers Case: Anna Holland

187. The judge said as follows in relation to Mx Holland:

> "Anna Holland, you are now 22 years of age and were 20 at the time of your offence. You have one previous conviction, in June 2023, for an offence of wilfully obstructing the highway. Sorry, in October 2022 for an offence of wilfully obstructing the highway. You were conditionally discharged for that matter in June 2023. Your conviction here does not put you in breach of that conditional discharge. I do note, however, that you committed that offence on 6 October 2022, only eight days before you committed the offence for which I must now sentence you. If not on police bail, you had at the very least, been released under investigation by the time of this offence.
> I have read and reflected on the pre-sentence report in your case, and on the many character references supplied on your behalf. You are an intelligent young

> woman who comes from a loving and supportive family. I was particularly struck by the frank and realistic comments in your mother's character reference. There is no doubt that what you did has had a substantial adverse effect on your family. I can see that you acknowledge that. You are currently studying part-time for a Master's degree at Newcastle University. The mitigation material shows how highly regarded you are by those who know you there as well as those who know you in other contexts. You have not reoffended since October 2022 and I am prepared to accept that you do not intend to offend again."

188. The character references before the judge included statements that:

> "She struck me as both confident and mature in relation to her studies.";
> "… I've been deeply impressed by her steadfast purpose, self-awareness and integrity. She does nothing without thinking it through, weighing both tactical considerations and deep moral convictions."

189. On the other hand, as the judge recognised, they also confirmed that Mx Holland had decided not to repeat her offending.

190. Mx Holland's sentence of 20 months' imprisonment was appreciably shorter than that imposed on Ms Plummer, to reflect the fact that, unlike Ms Plummer, she had given up offences of this nature. The judge took account of her youth. It was submitted that she was immature, but, in the respects we have indicated, the character references suggested that she was mature for her age. We dismiss her appeal for substantially the same reasons as we gave in Ms Plummer's case.

(7) Conclusion

191. For the reasons given in this judgment, having granted leave to appeal against sentence in each case:

i) We quash the sentences imposed in the M25 Conspiracy Case and substitute the following sentences:

a) Roger Hallam: 4 years' imprisonment.

b) Daniel Shaw: 3 years' imprisonment.

c) Lucia Whittaker de Abreu: 30 months' imprisonment.

d) Louise Lancaster: 3 years' imprisonment.

e) Cressida Gethin: 30 months' imprisonment.

ii) In the M25 Gantry Climbers Case:

a) We quash the sentence imposed on Gaie Delap and substitute a sentence of 18 months' imprisonment.

b) We dismiss the appeals by Paul Sousek, Theresa Higginson, Paul Bell and George Simonson.

iii) In the Thurrock Tunnels Case, we dismiss the appeals by Chris Bennett, Dr Larch Maxey, Samuel Johnson and Joe Howlett.

iv) In the Sunflowers Case, we dismiss the appeals by Phoebe Plummer and Anna Holland.

CLAIM NO: KB-2024-1765

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LONDON CITY AIRPORT LIMITED

(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

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

SSW11

This is the exhibit marked "SSW11" referred to in the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025.



Just Stop Oil is hanging up the hi vis

Press / March 27, 2025

Three years after bursting on the scene in a blaze of orange, at the end of April we will be hanging up the hi vis.

Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful.

So it is the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison. We have exposed the corruption at the heart of our legal system, which protects those causing death and destruction while prosecuting those seeking to minimize harm. Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK's oppressive anti-protest laws. We continue to rely on

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Cookie Settings Accept All

As corporations and billionaires corrupt political systems across the world, we need a different approach. We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Nothing short of a revolution is going to protect us from the coming storms.

We are calling on everyone who wants to be a part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. Sign up here. See you on the streets.

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

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

Website: https://juststopoil.org/

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

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

Twitter: https://twitter.com/JustStop_Oil

Youtube: https://juststopoil.org/youtube

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

Notes to Editors

[1] Just Stop Oil is committed to nonviolent direct action to resist the destruction of our communities as a result of climate breakdown. We do not consent to plans that will result in 3C of warming and mass death.

We demand an emergency plan to Just Stop Oil by 2030. Our government must work with other governments to end the extraction and burning of all oil, gas and coal by 2030.

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

Just Stop Oil 'Blue Lights' policy: our policy is, and has always been, to move out of the way for emergency vehicles with siren sounding and 'blue lights' on.

We use cookies on our website to give you the most relevant experience by remembering your preferences and repeat visits. By clicking "Accept All", you consent to the use of ALL the cookies. However, you may visit "Cookie Settings" to provide a controlled consent.

Cookie Settings Accept All

Anger flares at Just Stop Oil 'last day of action'



PA MEDIA

The driver of the minivan appeared to edge forwards slowly until the bonnet was pressing against the protesters

26 April 2025

A van appears to have been driven slowly into Just Stop Oil (JSO) protesters as hundreds marched through London for their "last day of action".

A mass of people wearing JSO's orange vests rallied in Westminster on Saturday **after the group claimed a victory on new oil and gas licences and said "we're hanging up the hi vis".**

The group has drawn attention, criticism and jail terms for protests ranging from **throwing soup on Vincent van Gogh's Sunflowers** and **spray-painting Charles Darwin's grave**, to **climbing on M25 gantries**.

During the march, a man in a white minivan appeared to edge it forwards until it was pressed against protesters. Police appeared to successfully call for the crowd to move away.

The minivan was also carrying a child and at least one other passenger.



PA MEDIA

Hundreds of people rallied in Westminster on Saturday afternoon for Just Stop Oil's "last day of action"

People standing front of the vehicle, some holding a JSO banner, were seen holding their hands up, with one shouting to the police "officer, I'm being pushed back".

The driver exited the vehicle and could be heard remonstrating with the protesters about the road being blocked.

Police reminded the man the disruption was temporary and people had a right to protest.

Other similar incidents of drivers apparently becoming frustrated with people in the road were also caught on camera.

In its March statement announcing the end of direct action, the group said: "Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history.

"We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful."



The Labour government has said it will not issue licences for new oil and gas exploration

The Labour government has said it will not issue licences for new oil and gas exploration, while a series of recent court cases have halted fossil fuel projects including oil drilling in Surrey, a coal mine in Cumbria and the Rosebank and Jackdaw fields in the North Sea over climate pollution.

Labour has distanced itself from Just Stop Oil, with Prime Minister Sir Keir Starmer criticising its actions and saying protesters must face the full force of the law.

The Metropolitan Police have been approached for comment.

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Related topics

London **Climate** **Environment** **City of Westminster**

Just Stop Oil

CLAIM NO: KB-2024-1765

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LONDON CITY AIRPORT LIMITED

(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

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

SSW12

This is the exhibit marked "SSW12" referred to in the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025.

'The police must crack down on Just Stop Oil's plans to make a comeback,' says Ben Leo



OPINION: Ben Leo revealed that Just Stop Oil are making a comeback

Now, I was getting pretty bored of the juvenile antics at the altar of climate change.

We've seen it all vandals throwing soup over priceless artworks in galleries, defacing Stonehenge, ambushing theatre productions in the West End, blocking traffic, scaling motorway gantries, dousing private jets in paint, and even disrupting sports events all just to spoil the fun for everyone else.

Remember them? They said they were disbanding after the government appeared to adopt their demand to end new oil and gas licences in Britain. Their actions, of course, cost the public tens of millions in police and court time.

But despite Ed Miliband bowing to their demands, I can exclusively reveal that Just Stop Oil is plotting a very big comeback.

TRENDING
Stories
Videos
Your Say

Ben Leo said: "I can exclusively reveal that Just Stop Oil is plotting a very big comeback."

GB NEWS

On Ben Leo Tonight, we havegained access to secret Just Stop Oil meetings, where members are discussing a dramatic U-turn—planning to cause chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and even carrying out “citizens’ arrests” on so-called climate criminals.

Speaking during an online meeting on Thursday night, one coordinator—known only as “Dave”—said protests should remain "action-based" and warned against becoming more peaceful, like Greenpeace.

LATEST DEVELOPMENTS

- **Just Stop Oil poster girl avoids prison despite causing 'large-scale disruption' on M25 which cost the Met Police more than £1m**
- **Net zero rubbishers are starting to sound a lot like Just Stop Oil without the superglue - Nigel Nelson**
- **Just Stop Oil activist declares ‘we WILL be back’ as tense row breaks out on GB News**

The meeting continued with Dave insisting that it was essential to keep doing what he called the “spicy and naughty stuff” to generate media attention.

The group also discussed how to feed new protest ideas back to what they referred to as a "core team". There was frustration over communication with this mysterious leadership group, with some suggesting using 50-word briefs to make it easier for them to process ideas.

It raises serious questions: Who exactly is this core team? Who are these professional protesters reporting to—and who’s funding them?

Chillingly, the group also spoke about carrying out citizen’s arrests on so-called climate deniers. There was some introspection as well, with members questioning whether their public image was doing more harm than good.

Just Stop Oil protesters targeting Stonehenge
JUST STOP OIL

But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to proceed with Just Stop Oil's revival, including talk of keeping protesters in safe houses to maintain morale.

Let's be clear: what we're dealing with here is a group of climate zealots plotting to commit criminal acts, backed by who knows what kind of funding, and being housed like some kind of eco-mafia.

And speaking of coordination—let's not pretend the climate agenda is a spontaneous grassroots movement. It's organised. It's funded. It's political.

So, who's paying to bus these protesters from London to Stonehenge, to airports, to art galleries and sports stadiums? Who's funding the Just Stop Oil safe houses where these scruffy, self-righteous agitators meticulously plan how to make Britain colder and poorer?

Just Stop Oil protest in LondonJust Stop Oil

The police and the government must crack down on Just Stop Oil's plans for criminality before they gain traction again.

The last thing Britain needs is more disruption, more vandalism, and more self-indulgent eco-activism especially when a Labour government is already happily marching to the drumbeat of Net Zero extremism.

We'll be passing our findings to the police.

GB News has approached Just Stop Oil for a comment.

Payne, Emma

From: Payne, Emma
Sent: 02 June 2025 14:08
To: Payne, Emma
Subject: FW: Exposed by GB News

Importance: High

From: Just Stop Oil <info@juststopoil.org>
Sent: 21 May 2025 19:29
To: Wortley, Stuart <StuartWortley@eversheds-sutherland.com>
Subject: Exposed by GB News

JUST STOP OIL

Dear Stuart,

GB News was right for once. We are "plotting a very big comeback".

While we have stopped taking action as Just Stop Oil after winning our initial demand, we also know that revolutionary change is needed now more than ever. In the three years since Just Stop Oil began in 2022, the necessity to resist has become impossible to ignore.

We've seen the world's billionaires accumulate $3.7 trillion in wealth, making them now richer than almost every country in the world. Over 50,000 Palestinians have been killed in the ongoing genocide in Gaza, a genocide that is still bankrolled and armed by our own government. At least 166,000 people are being killed due to government inaction on the climate crisis every year with a recent report estimating 4 billion total deaths if we don't take urgent action. The UK is facing a cost of living crisis that doesn't seem to have an end in sight. We've passed the 1.5 C global heating threshold that was internationally agreed upon to limit heating to in the 2015 Paris Agreement. And as the cherry on top of this pile of shit, our rights to dissent to this, to protest in this country are being steadily infringed upon with new laws and powers being introduced to criminalise protest and unprecedented prison sentences being handed out to nonviolent protestors.

It's clear that our government could not care less about ordinary people. Corrupt politicians are serving the interests of billionaires while the media is shifting blame from their mates on mega yachts to the people in small boats all while the world gets hotter and hotter.

Nothing short of a political and economic revolution is going to get us out of this mess. Just Stop Oil was just the beginning. A new campaign is in the works--one that will build on our knowledge and success as Just Stop Oil and will face the grinding injustice of our political and economic system head on. **We're just getting started. You're here at ground zero of the revolution and we need your support to get it off the ground. Can you donate to make it happen?**

Donate to help build the revolution

We run entirely off of donations and while the street campaign is over, there's still a lot of work to be done. Donations go towards building the next campaign and ensuring it's up to the task of challenging the system AND to supporting the hundreds of brave people who are still being dragged through the courts with fines, prison time, electronic tags, and isolating curfews.



Do you also want to get involved in a more practical way in building the revolution? Interested in learning the skills needed to organize and build resilient communities and movements? Curious about theories of change and nonviolent resistance? Join us on Saturday 14th and Sunday 15th of June in London as we join forces with Youth Demand for the launch of the Seeds of Revolution training programme. Everyone is welcome, old and young, seasoned veterans and fresh faces. We want to meet you!

CLAIM NO: KB-2024-1765

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LONDON CITY AIRPORT LIMITED

(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

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

SSW1□

This is the exhibit marked "SSW1□" referred to in the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025.

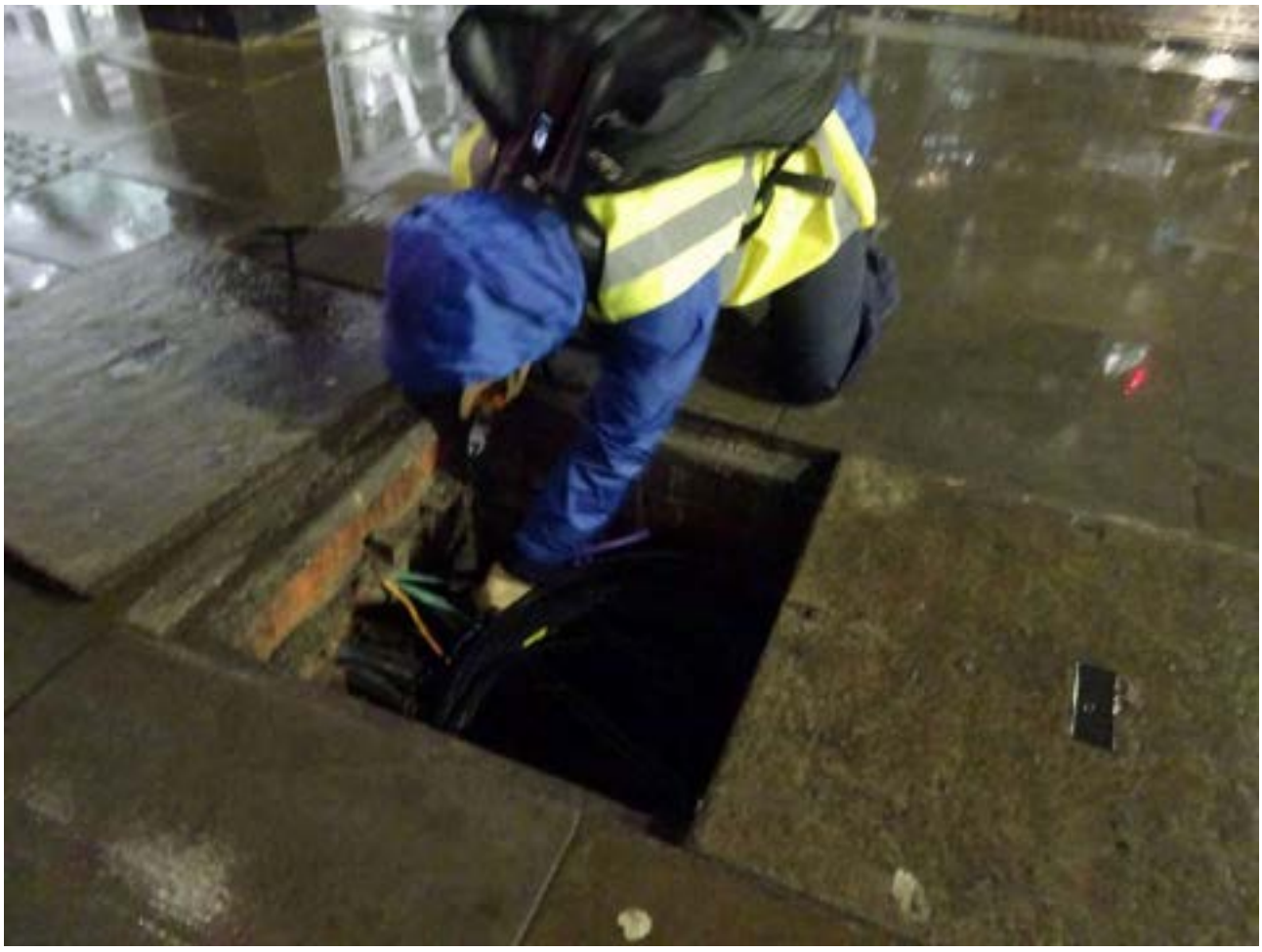
Nine climate-wrecking insurance giants just got their Wi-Fi CUT OFF by activists

This article was updated at 2pm on Tuesday 21 January to remove a reference to insurers Ariel Re, as they were not targeted by the group.

Activists from Shut The System have cut fiber optic cables to offices of hundreds of insurance companies, in a new form of non-violent direct action. They call on insurance companies to immediately end all underwriting for fossil fuel expansion and demand robust transition plans from fossil fuel clients.

Shut The System: shut the Wi-Fi down

The action has caused huge levels of disruption with hours of work lost for insurance providers. These include three of the world's largest fossil fuel insurers, AXA, W.R. Berkely, AIG and more than 400 agents at Lloyd's of London and London's iconic Walkie Talkie tower:



The group shut the following insurers down:
London:

- Lloyd's of London, comprising 402 brokers and 55 managing agents
- 20 Fenchurch Street (the Walkie Talkie building), the office of Ascot, Hardy, Kiln, Lancashire Syndicate, Tokio Marine, Markel

- Talbot AIG, one of the world's worst fossil fuel insurers, which shares an office with RWE, the German energy company targeted by protesters against one of Germany's largest coal mines – 60 Threadneedle Street
- 52 Lime Street – WR Berkley, Chaucer, two of the world's worst fossil fuel insurers
- Chubb – 100 Leadenhall street
- AIG – Fenchurch Street

Birmingham:

- AIG, one of the world's largest fossil fuel insurers – 60 Church street

Sheffield:

- Markel, insuring coal, oil and gas – Ecclesall Road South

Leeds:

- AXA, one of the world's largest fossil fuel insurers – 21 Queen street



Shut The System took action against these companies due to their critical role underpinning the fossil fuel economy through underwriting contracts and investments. The sector is simultaneously withdrawing coverage from climate-affected regions and raising premiums for households due to extreme-weather related events.

Insuring for the planet wreckers

A Shut The System activist said:

> *If these powerful companies don't make public statements that they will stop driving fossil fuel expansion and destroying life on Earth, then we have no choice but to stop them ourselves. We will not give up until insurance companies take responsible action.*

In recent years, the insurance sector has felt escalating pressure from environmental campaigners resulting in a string of breakthroughs. The insurer, Probitas, ruled out insuring West Cumbria Coal Mine and East African Crude Oil Pipeline after activists sprayed paint over their offices; and Zurich introduced new fossil fuel exclusion policies following negotiations with protesters.

The group took action on the day that climate science-denier Donald Trump is inaugurated into the White House for a second term, following his scathing remarks about the UK's energy policies, saying the UK should 'get rid of windmills'.

The growing urgency for the insurance industry to take the lead in addressing the climate crisis comes as we exceed the 1.5C critical threshold for global warming faster than many climate scientists predicted. This comes amidst of some of the worst wildfires ever seen in Los Angeles and severe flooding in the UK forcing thousands to evacuate their homes.

Featured image and additional images via Shut The System

Man arrested as environmental activists take credit for cutting UK insurance firms' fiber optic cables

Shut the System claim to have disrupted the Internet comms for hundreds of insurance firms across the UK

A man has been arrested after climate activists claimed responsibility for damaging fiber optic cables outside major insurance companies.

As reported by The Guardian, a 29-year-old man arrested by City of London police after Shut the System said they sabotaged cables across multiple cities in the UK.



– Getty Images

In a statement last week, the activist group said it had cut cables to insurance company offices in London, Leeds, Birmingham, and Sheffield.

The company noted that its reasons for the attacks against insurers are "due to their critical role underpinning the fossil fuel economy through underwriting contracts and investments."

Police say the man was arrested on January 20 on suspicion of criminal damage. He has been bailed pending further investigations.

The damage caused to the insurers was reportedly not as significant as hoped, but did cause a slowdown in Internet speed.

Shut the System claimed to have disrupted the WiFi systems of hundreds of insurance companies across the country.

According to the group, fiber optics were targeted at the insurance market at Lloyd's of London, the Walkie Talkie building at 20 Fenchurch Street, plus offices of Talbot AIG at 60 Threadneedle Street, Chubb at 100 Leadenhall Street, and AIG on Fenchurch Street.

The group said it also targeted the offices of AIG in Birmingham, Markel in Sheffield, and Axa in Leeds.

"There doesn't seem to have been as much impact as I suspect the protesters hoped," Matthew Geyman, the managing director of Intersys, a cybersecurity company with offices in the City, told

The Guardian. "This is likely because robust communication systems are designed to be resilient to these attacks."

"If these powerful companies don't make public statements that they will stop driving fossil fuel expansion and destroying life on Earth, then we have no choice but to stop them ourselves," the group's statement said. "We will not give up until insurance companies take responsible action."

The group has previously targeted insurance companies by smashing windows and throwing red paint on the buildings.

CLAIM NO: KB-2024-1765

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LONDON CITY AIRPORT LIMITED

(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

and

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Defendant

SSW14

This is the exhibit marked "SSW14" referred to in the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025.

From [redacted]@met.police.uk[redacted]@met.police.uk>
Sent: Wednesday, May 21, 2025 10:23:06 AM
To: [redacted]@met.police.uk>[redacted]@londoncityairport.com>; [redacted]@londoncityairport.com>
Cc: [redacted]@met.police.uk[redacted]@met.police.uk>[redacted]@met.police.uk <[redacted]@met.police.uk>
Subject: RE: UKAIF: NPOCC SIB: Current Aviation Protest picture

[redacted]

Hope the below is useful. I know it is mentioned but the injunction at HAL had a real impact on the Shell protest yesterday and builds on your experiences. To remove an injunction now would open up to further protest and whilst JSO have stepped down there tends to be a cycle of new groups emerging and this can not be ruled out so maintaining it would be very much recommended.

Hope this helps.

Regards,
[redacted]

From: [redacted]@met.police.uk>
Sent: 21 May 2025 07:56
To: [redacted]@londoncityairport.com>;[redacted]@londoncityairport.com>
Cc:[redacted]@met.police.uk[redacted]@met.police.uk>[redacted]@met.police.uk>
Subject: FW: UKAIF: NPOCC SIB: Current Aviation Protest picture

Moring [redacted]

Please see the below update from our partners at NPOCC (National Police Coordination Centre) regarding the current aviation protest picture. This is shareable with yourselves and may be of assistance with further extension of injunctions.

Kind regards

[redacted]

From: [redacted]@sussex.police.uk>
Sent: 21 May 2025 07:36
To: [redacted]@scotland.police.uk; [redacted]@scotland.police.uk;

[redacted]@humberside.police.uk; [redacted]@leics.police.uk; [redacted]@scotland.police.uk; [redacted]@scotland.police.uk; [redacted]@avonandsomerset.police.uk>; [redacted]@merseyside.police.uk>; [redacted]@northwales.police.uk; [redacted]@scotland.police.uk [redacted]@scotland.police.uk; [redacted]@met.police.uk> [redacted]@westyorkshire.police.uk>; [redacted]@sussex.police.uk>; [redacted]@gmp.police.uk>; [redacted]@met.police.uk> [redacted]@scotland.police.uk; [redacted]@lancashire.police.uk; [redacted]@essex.police.uk; [redacted]@scotland.police.uk; [redacted]@scotland.police.uk; [redacted]@scotland.police.uk; [redacted]@northumbria.police.uk>; [redacted]@dorset.pnn.police.uk; [redacted]@met.police.uk>; [redacted]@psni.police.uk; [redacted]@dorset.pnn.police.uk; [redacted]scotland.police.uk; [redacted]@south-wales.police.uk; [redacted]@scotland.police.uk>; [redacted]@norfolk.police.uk>; [redacted]@essex.police.uk; [redacted]@cambs.police.uk; [redacted]@devonandcornwall.pnn.police.uk; [redacted]@beds.police.uk; [redacted]@westmidlands.police.uk>; [redacted]@durham.police.uk; [redacted]@scotland.police.uk; [redacted]@hampshire.police.uk>; [redacted]@met.police.uk>; [redacted]@thamesvalley.police.uk

Subject: UKAIF: NPOCC SIB: Current Aviation Protest picture

Good Morning colleagues,

I am grateful to John Foreman at NPOCC SIB for the below sitrep in relation to JSO and the wider protest piece in relation to UK Aviation. This may be useful if approached by your operator in consideration of their decision whether or not to apply for a further extension on High Court Injunctions obtained last year.
It is fair to say that we are not in the same place we were then, and whilst I have my own view on the necessity of a further injuncted period, it would be inappropriate for me to express this opinion and for that to be a local, operator led decision.

The following would be the current assessment of NPoCC SIB regarding the Anti-Aviation environmental sub-thematic:

[START TEXT]

The overall situation with environmental protest regarding anti-aviation / airport expansion is that within the UK the position has returned to dormant.

With the outcome of the main Operation ZIZEL prosecutions resulting in convictions and custodial sentences, this appears to be having a deterrent effect on the resolve of UK environmental protesters to engage in further targeting of aviation industry interests. Whilst European environmental protest groups – such as those associated with the *A22 Network* – remain active within the anti-aviation protest space abroad, they have openly noted the significant impact of the UK criminal justice system on UK environmentalism and will thus be similarly deterred from engaging in any direct action within the UK, for fear of attracting such penalties themselves.

Additionally, with the demise of *Just Stop Oil* (JSO), this also leaves the UK without a leading environmental direct action protest group at this time. Those UK environmental protest groups that remain active, are predominantly engaging only in lawful protest activity. By way of relevant example, those environmental protest groups who desired to oppose the Shell AGM on 20/05/2025, conscious of the Heathrow Airport Limited (HAL) High Court Injunction still in effect, were forced to hold their protest at the Shell head office in central London rather than the AGM location at a hotel within the Heathrow Airport injuncted area, in order to avoid the risk of associated penalties for breaching of the injunction.

Youth Demand (YD) are filling some of the void left by JSO, particularly in terms of recent targeting of cultural / sporting events, but are almost entirely focused on pro-Palestinian issues. Hence if YD were to target aviation interests, it would have to significantly serve their primary purpose of opposing Israel's conflict with the Palestinians.

Whilst YD protesters are experienced, capable and motivated to carry out high-profile direct action utilising very small numbers of protesters, there appears to only be a small cohort of YD willing to risk prosecutions arising from such activity. Overall, despite their online rhetoric, YD does not appear to be effective in growing their protest group numbers beyond a fluctuating core membership of circa 50 persons.

With UK Government approval for proposed expansion of Gatwick, Heathrow and Luton airports, there has been vocal opposition from environmentalist, but mainly those existing local / regional campaign groups, who will not engage in protest criminality. Believed interest in opposing airport expansion by the regenerated environmental direct action protest group *Reclaim The Power* (RTP), needs to be tempered against the fact that the group in its newest incarnation of primarily higher-education aged persons based in the North East area of England, have yet to engage in any protest of significance. 15 RTP protesters remain on bail pending trial in September 2025 for POA 2023 offences in connection with their attempt to stage a protest camp in opposition to Drax power station during 2024. Further to this, the RTP group continue to display general naivety around engaging in protest associated criminality, with circa 13 RTP protesters currently sought or identified and arrested in connection with the investigation into a recent burglary of an office building linked to the biofuel industry, further impacting the group's capability and credibility to function as an effective direct action protest group. Overall, significant physical protest opposition to any expansion of the three airports will be assuaged until such time that any legal challenges have been exhausted and there is on-going work available to be physically obstructed.

Sporadic protest in opposition to private jet hubs continues at a couple of sites in the South East region, but fails to reach a level of activity that requires any significant police intervention at this time.

[END TEXT]

I hope this assists, as all of the above is shareable with non-police stakeholders. But please do come back to me if you need anything further.

[redacted]

[redacted]

Book time with me

You can report crime and incidents online at

https://www.sussex.police.uk/report-online

We want to know your views - see what's new and give us your feedback and suggestions at www.sussex.police.uk
If you have received this message in error, please contact the sender as soon as possible - you may not copy

Claim no: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) PLC
(3) MANCHESTER AIRPORT CAR PARK (1) LIMIED

AND TWO OTHERS

Claimants

-and-

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

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the injunction made by Order dated 5 July 2024 by HHJ Coe KC ("**the HHJ Coe KC Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 **("the Claims")**

AND UPON reading the application and the witness evidence in support

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the HHJ Coe KC Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the HHJ Coe KC Order

2. Paragraph 4 of the HHJ Coe KC Order is amended so as to read:

   "This Order is subject to periodic review by the Court on application by the First, Second and Third Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) PLC
(3) MANCHESTER AIRPORT CAR PARK (1) LIMIED

AND TWO OTHERS

Claimants

-and-

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

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

□□□

UPON the Claimants' claim by the claim form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024

AND UPON the injunction made by Order dated 5 July 2024 by HHJ Coe KC ("**the HHJ Coe KC Order**")

AND UPON the Claimants' application dated 2 June 2025 ("**the Application**")

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 ("**the Claims**")

AND UPON reading the Application and the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the HHJ Coe KC Order

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Manchester Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the HHJ Coe KC Order

DEFINITIONS

"**Manchester Airport**" means the land shown in red outlined in red on Plan 1 to the Claim Form (including the highways therein), appended to this Order in Schedule 1 ("**Plan 1**")

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

https://www.manchesterairport.co.uk/injunction at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendants and each of them are forbidden from entering, occupying or remaining on any part of Manchester Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First, Second and Third Claimants (or any of them).

2. 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 and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the First Defendants by:

    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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the First Defendants and each of them.

6. The Court will provide sealed copies of this Order to the Claimants' solicitors for service or notification (whose details are set out below).

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the First Defendants of any further applications or documents in the proceedings by the First, Second and Third Claimants shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The First, Second and Third Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 1 will be the same as Plan 1 attached to the HHJ Coe KC Order

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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST, SECOND AND THIRD CLAIMANTS

(1) The Claimants will take steps to serve the First Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

(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 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

□□□

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Claim no: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(4) STANSTED AIRPORT LTD

AND FOUR OTHERS

Claimants

-and-

(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)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the injunction made by Order dated 5 July 2024 by HHJ Coe KC ("**the HHJ Coe KC Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 **("the Claims")**

AND UPON reading the application and the witness evidence in support

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the HHJ Coe KC Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the HHJ Coe KC Order

2. Paragraph 4 of the HHJ Coe KC Order is amended so as to read:

   "This Order is subject to periodic review by the Court on application by the First, Second and Third Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(4) STANSTED AIRPORT LTD

AND FOUR OTHERS

Claimants

-and-

(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)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the Claimants' claim by the claim form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024

AND UPON the injunction made by Order dated 5 July 2024 by HHJ Coe KC ("**the HHJ Coe KC Order**")

AND UPON the Claimants' application dated 2 June 2025 (**"the Application"**)

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 ("**the Claims**")

AND UPON reading the application and the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the HHJ Coe KC Order

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Stansted Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the HHJ Coe KC Order

DEFINITIONS

"**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**")

"**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/about-us/injunction/ at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendants and each of them are forbidden from entering, occupying or remaining on any part of Stansted Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Fourth Claimant (or any of them).

2. This Order is subject to periodic review by the Court on application by the Fourth Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the Second Defendants by:

    a. Uploading a copy onto the following website: https://www.stanstedairport.com/about-us/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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Second Defendants and each of them.

6. The Court will provide sealed copies of this Order to the Claimants' solicitors for service or notification (whose details are set out below).

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification 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 paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. Fourth Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 2 will be the same as Plan 2 attached to the HHJ Coe KC Order

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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FOURTH CLAIMANT

(1) The Fourth Claimant will take steps to serve the Second Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

(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 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

□□□

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED INSERT ("the Order")

TO: Persons Unknown whose purpose is or includes protest on the premises at Stansted Airport shown edged red on Plan 2 or 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 or Extinction Rebellion or otherwise) (the "**Defendants**")

FROM: Stansted Airport (the "**Fourth Claimant**")

This notice relates to the land known as Stansted Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport without the consent of the Fourth Claimant.

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

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the 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 24 July 2025 may be viewed at: https://www.stanstedairport.com/about-us/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.

Claim no: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

AND FOUR OTHERS

Claimants

-and-

(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)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the injunction made by Order dated 5 July 2024 by HHJ Coe KC ("**the HHJ Coe KC Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 **("the Claims")**

AND UPON reading the application and the witness evidence in support

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the HHJ Coe KC Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the HHJ Coe KC Order

2. Paragraph 4 of the HHJ Coe KC Order is amended so as to read:

   "This Order is subject to periodic review by the Court on application by the First, Second and Third Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

AND FOUR OTHERS

Claimants

-and-

(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)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the Claimants' claim by the claim form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024

AND UPON the injunction made by Order dated 5 July 2024 by HHJ Coe KC ("**the HHJ Coe KC Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 **("the Claims")**

AND UPON reading the application and the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the HHJ Coe KC Order

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at East Midlands Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the HHJ Coe KC Order

DEFINITIONS

"**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**")

"**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/about-us/injunction at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendants and each of them are forbidden from entering, occupying or remaining on any part of East Midlands Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Fifth Claimant (or any of them).

2. This Order is subject to periodic review by the Court on application by the Fifth Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the Third Defendants by:

    a. Uploading a copy onto the following website: https://www.eastmidlandsairport.com/about-us/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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Third Defendants and each of them.

6. The Court will provide sealed copies of this Order to the Claimants' solicitors for service or notification (whose details are set out below).

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification 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 paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. Fifth Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 3 will be the same as Plan 3 attached to the HHJ Coe KC Order

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIFTH CLAIMANT

(1) The Claimants will take steps to serve the Third Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

(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 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Amended pursuant to the order of HHJ Coe KC dated 5 July 2024

Claim Form

In the	
Fee Account no.	
Help with Fees - Ref no. (if applicable)	H W F – –

You may be able to issue your claim online which may save time and money. Go to www.moneyclaim.gov.uk to find out more.

	For court use only
Claim no.	
Issue date	

Claimant(s) name(s) and address(es) including postcode

(1) **Manchester Airport PLC**
of Level 5 Town Hall Extension, Albert Square, Manchester M60 2LA
(2) **Airport City (Manchester) Limited**
of 6th Olympic House, Manchester Airport, Manchester M90 1QX
(3) **Manchester Airport Car Park (1) Limited**
of 6th Olympic House, Manchester Airport, Manchester M90 1QX
(4) **Stansted Airport Limited**
of Enterprise House, Bassingbourn Road, Stansted Airport, Essex CM24 1QW
(5) **East Midlands International Airport Limited**
of Pathfinder House, Castle Donington, Derby DE74 2SA

HIGH COURT OF JUSTICE
SEAL
19 Jul 2024
QUEEN'S BENCH DIVISION

KB-2024-002132
DATE OF ISSUE
03/07/2024

Defendant(s) name and Address(es) including postcode

Please refer to Schedule 1 attached to the Claim Form

Brief details of claim

Value

Defendant's name and address for service including postcode

	£
Amount claimed	
Court fee	
Legal representative's costs	
Total amount	

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

© Crown Copyright 2022

Claim no.	

You must indicate your preferred County Court Hearing Centre for hearings here (see notes for guidance)

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

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

☐ No

Does, or will, your claim include any issues under the Human Rights Act 1998?

☐ Yes

☐ No

Claim no.	

Particulars of Claim

☐ attached

☐ to follow

Statement of truth

Note: you are reminded that a copy of this claim form must be served on all other parties.

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

☐ **I believe** that the facts stated in this claim form and any attached sheets are true.

☐ **The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

Signature



☐ Claimant

☐ Litigation friend (where claimant is a child or protected party)

☐ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day | Month | Year

Full name

Name of claimant's legal representative's firm

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

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

Second line of address

Town or city

County (optional)

Postcode

If applicable

Phone number

DX number

Your Ref.

Email

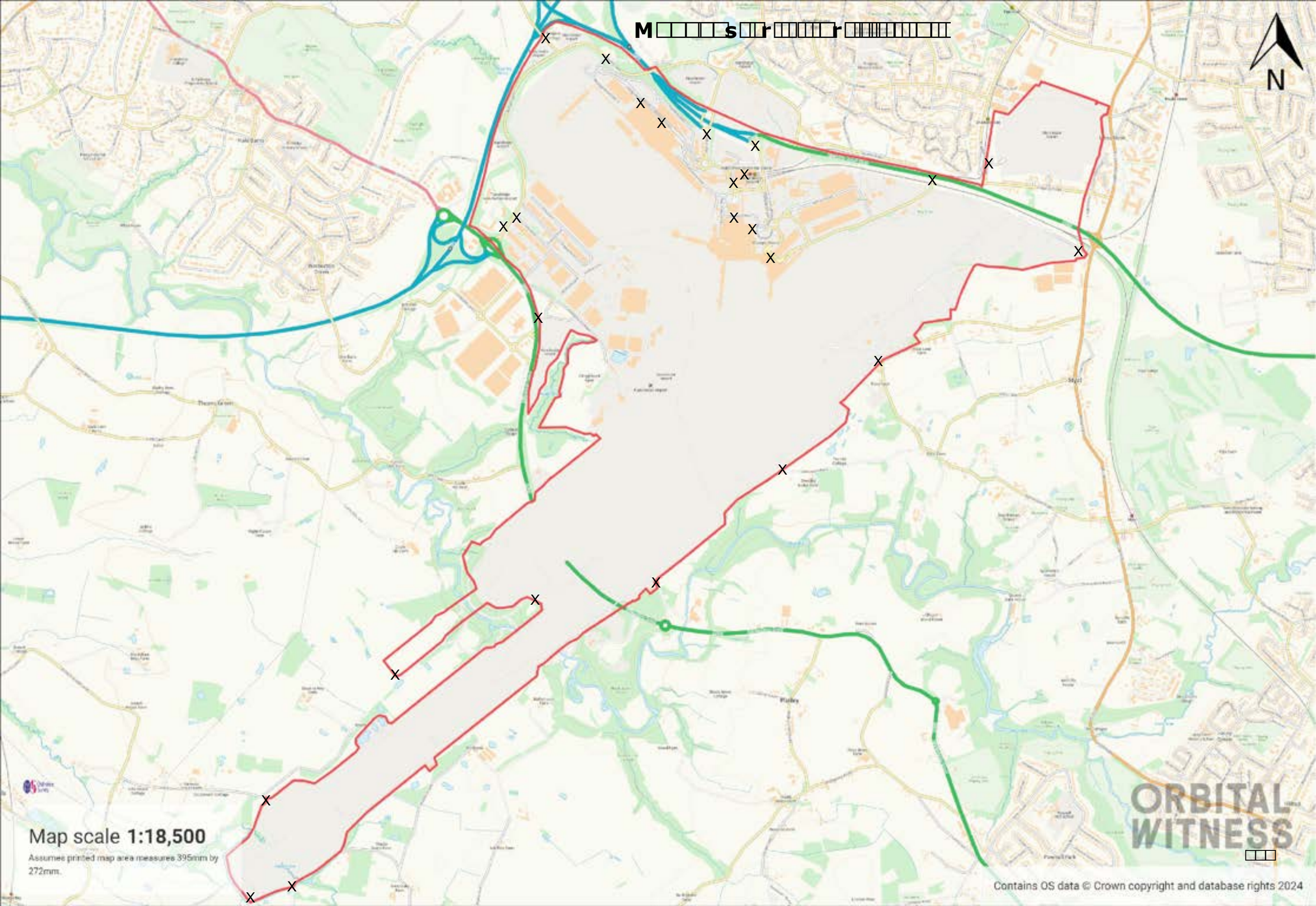
Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter

SCHEDULE 1 TO THE CLAIM FORM

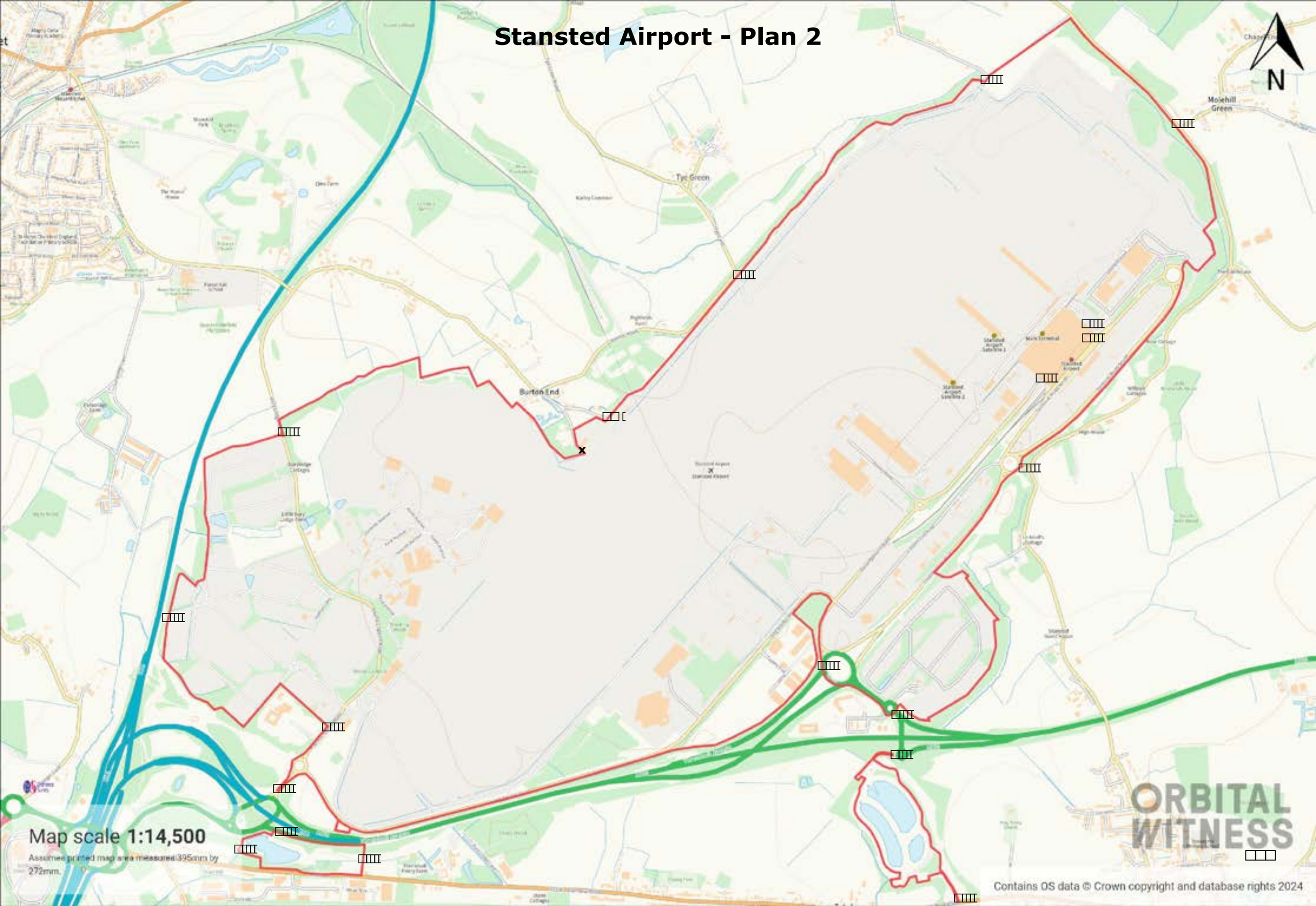
(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST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

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)


N
Map scale 1:18,500
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

Stansted Airport - Plan 2



Injunction Area

East Midlands - Plan 3

N

0 500 m 1000 m

Contains OS data © Crown copyright and database rights 2024

ORBITAL WITNESS

Amended pursuant to the order of HHJ Coe K.C. dated 5 July 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2024-002132

BETWEEN:-

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v -

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

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Defendants

PARTICULARS OF CLAIM

Manchester Airport

1. The First Claimant is the operator of Manchester Airport, located in Manchester M90 1QX, shown outlined in red on Plan 1 ("**Manchester Airport**"). Manchester Airport serves around 25 million travelling passengers each year with an annual revenue of approximately £425 million.

2. The First, Second and Third Claimants are the registered proprietors of the land on which Manchester Airport is situated as shown in red on Plan 1, through a mixture of freehold and leasehold interests as shown in the Title Schedule hereto — but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas and subject also to certain highways.

3. Subject to those interests, the First, Second and Third Claimants are entitled to an immediate right of possession occupation and control of Manchester Airport, by virtue of their respective titles as shown in the Title Schedule.

4. Plan 1A depicts the areas within Manchester Airport which are the subject of third party interests, shown thereon shaded in blue, green and brown ("**the Manchester Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First, Second and Third Claimants are displaced as the persons with an immediate right of occupation or possession. The brown land is a railway/ railway station. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes certain the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

5. Nevertheless, access to or from the Manchester Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Manchester Aiport which remain unencumbered by any such arrangement and in relation to which, accordingly, the First to Third Claimants remain entitled to possession occupation and control by virtue of their interests shown in the Title Schedule.

6. Also shown on Plan 1A are the highways shown shaded in pink on Plan 1A, which run beneath the taxiway within the Airport and/or provide access to Manchester Airport to the First to Third Claimants and their licensees (including members of the public).

7. By virtue of s63 of the Airports Act 1996, the First Claimant has power to make byelaws with respect to Manchester Airport. Pursuant to the Manchester Airport Byelaws 2024, byelaw 3.36, 3.10 and 3.34, no person has a right to use any part of Manchester Airport as defined therein for protest. The plan which defines Manchester Airport for the purposes of the Byelaws is not in all respects identical to Plan 1. However, the area covered by the Byelaws includes (a) the Manchester Third Party Areas and (b) the highways therein.

Stansted Airport

8. The Fourth Claimant is the operator of Stansted Airport, located in Stansted CM24 1QW, shown outlined in red on Plan 2 ("**Stansted Airport**"). Stansted Airport serves around 25 million travelling passengers each year with an annual revenue of approximately £373 million.

9. The Fourth Claimant is the proprietor of the land on which Stansted Airport is situated as shown in red on Plan 2, through the interests shown in the Title Schedule hereto—— but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

10. Subject to those interests of third parties, the Fourth Claimant is entitled to an immediate right of possession occupation and control of Stansted Airport, by virtue of its titles as shown in the Title Schedule.

11. Plan 2A depicts the areas within Stansted Airport which are the subject of third party interests, shown thereon shaded in blue, green, purple and pink ("**the Stansted Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fourth Claimant is displaced as the person with an immediate right of occupation or possession. The purple land is a railway station. The pink land is a railway tunnel. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes certain the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

12. Nevertheless, access to or from the Stansted Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Stansted Aiport which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fourth Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

13. By virtue of s63 of the Airports Act 1996, the Fourth Claimant has power to make byelaws with respect to Stansted Airport. Pursuant to the Stansted Airport Byelaws 1996, byelaws 3.17 and 3.19, no person has a right to use any part of Stansted Airport for protest.

East Midlands Airport

14. The Fifth Claimant is the operator of East Midlands International Airport, located in Castle Donnington, Derby DE74 2SA, shown outlined in red on Plan 3 ("**EMA**"). EMA served around 3.3 million travelling passengers each year with an annual revenue of approximately £81 million.

15. The Fifth Claimant is the proprietor of the land on which EMA is situated as shown in red on Plan 3, through the interests shown in the Title Schedule hereto—but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

16. Subject to those interests of third parties, the Fifth Claimant is entitled to an immediate right of possession occupation and control of EMA, by virtue of its titles as shown in the Title Schedule.

17. Plan 3A depicts the areas within EMA which are the subject of third party interests, shown thereon shaded in blue and green ("**the EMA Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fifth Claimant is displaced as the person with an immediate right of occupation or possession. The blue land consists of (and the green land includes) areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes certain the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

18. One of those areas, namely, the East Midlands Aeropark, takes direct access from the public highway. Subject to that exception: access to or from the EMA Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of the EMA which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fifth Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

19. By virtue of s63 of the Airports Act 1996, the Fifth Claimant has power to make byelaws with respect to EMA. Pursuant to the East Midlands Airport Byelaws 2001, byelaw 3.5, no person has a right to use any part of Stansted Airport for protest.

The Claimants' claims

20. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management/ airline facilities, and a railway station.

21. In relation to each airport:

    a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).

    b. No wider consent subsists; and (subject to the highways at Manchester Airport described above) no public right of access, or way, subsists over the airports.

    c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.

    d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

22. In relation to the Third Party Areas at each airport:

    a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the



Court to make an order which does not distinguish between the airports generally (as shown outlined in red on the various plans) and the Third Party Areas within them;

b. Further or alternatively, protest which occurs on the Third Party Areas threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.

23. Further, in respect of the highways at Manchester Airport described above: protest which occurs on these highways threatens:

a. Unreasonably and substantially to interfere with the First,Second and Third Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;

b. Unreasonably and substantially to obstruct or hinder the free passage along the highway, occasioning particular damage to the First, Second and Third Claimants; and

c. In respect of the tunnelled highway in pink on Plan 1A, unreasonably and substantially to interfere with the First, Second and Third Claimants' ordinary use and enjoyment of the airport, insofar as a need might arise to close off the runaway for safety reasons; and

d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the Manchester Airport Byelaws 2024.

The threats

24. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:

25. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations…"

26. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").

27. At this meeting, a co-founder of Just Stop Oil was reported to have advocated:

- Cutting through fences and gluing themselves to runway tarmac;
- Cycling in circles on runways;
- Climbing on to planes to prevent them from taking off;
- Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.

28. Since that meeting, Just Stop Oil has announced the following on its website:

> "***SO WHAT'S THE PLAN?***
> *Our Government doesn't give a f*** about its responsibilities. The country is in ruins. You know it, I know, they know it. That means it's up to us to come together and be the change we need.*
>
> *We need bold, un-ignorable action that confronts the fossil fuel elites. We refuse to comply with a system which is killing millions around the world, and that's why we have declared airports a site of nonviolent civil resistance."*
>
> *We can't do this alone, we have a plan for this Summer, are you willing help make this happen?"*

29. It says, further:

> "***This summer, Just Stop Oil will be taking action at airports.***
>
> *As the grass becomes scorched, hosepipe bans kick in and the heat of the climate crisis enters peoples' minds, our resistance will put the spotlight on the heaviest users of fossil fuels and call everyone into action with us.*
>
> *We'll work in teams of between 10-14 people willing to risk arrest from all over the UK. We need to be a minimum of 200 people to make this happen, but we'll be prepared to scale in size as our numbers increase. Exact dates and more details are coming.*
>
> *Our plan can send shockwaves around the world and finish oil and gas. But we need each other to make it happen. Are you ready to join the team?"*

30. Just Stop Oil has also organised a fundraising page on the website https://chuffed.org/project/just-stop-oil-resisting-against-new-oil-and-gas, which says the following:[1]

> *"**Cat's out the bag. Just Stop Oil will take action at airports***
>
> ***The secret is out — and our new actions are going to be big.***
> *We're going so big that we can't even tell you the full plan, but know this — Just Stop Oil will be taking our most radical action yet this summer. We'll be taking action at sites of key importance to the fossil fuel industry; **super-polluting airports**.*
>
> *…"*

31. On 6 June 2024, an email was sent from info@juststopoil.org to a subscriber list stating:

> *"This is the most exciting email I've ever sent.*
>
> *As many of you already know, this summer Just Stop Oil is taking action at airports.*
>
> *That's exciting right? Well, there's more.*
>
> *We won't be taking action alone.*
>
> *Resistance groups across several countries in Europe have agreed to work together. That means this summer's actions will be internationally coordinated.*
>
> *PICTURE OF AIRPORT ACTIONS SYMBOLISING INTERNATIONAL COMMUNITY (https://us02web.zoom.us/meeting/register/tZIodugpqTMtE9dgMMhlaymvEZgO45jgJ19A)*
>
> *People across Europe will be taking the fight to airports, the heart of the fossil economy.*
>
> *This summer's actions across multiple countries will go down in history.*
>
> *Want to meet the people making this happen?*
>
> *Every Thursday for the next four weeks starting on the 13th of JUNE, 6.30pm*
>
> *You don't want to miss this.*
>
> *See you there,*
>
> *Just Stop Oil"*

32. On 2 June 2024, Extinction Rebellion environmental activists blocked access to Farnborough Airport.

[1] As of 27 June 2024, £24,099 had been raised on this website.

33. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at Stansted Airport, in one of the Third Party Areas (an area which is subject to an occupational arrangement with a third party), as part of a series of protests on climate change. This included:

    a. an individual using an angle grinder to cut a hole in the perimeter fence of the airport;

    b. two individuals trespassing the perimeter fence; and

    c. spray painting two aircrafts orange using a fire extinguisher.

34. As a result of this direct action:

    a. Notwithstanding that the protest took place on a Third Party Area, it was necessary to suspend operations on the runway on the Fourth Claimant's retained land in Stansted Airport for approximately 50 minutes: three aircraft departures were affected.

    b. the two individuals (known as Jenifer Kowalski and Cole Macdonald) were arrested and charged with causing criminal damage, aggravated trespass and interference with the use or operation of national infrastructure.

35. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for Manchester Airport, Stansted Airport and/or East Midlands Airport:

    a. trespass on the Airport and/or

    b. by protest conducted on or from the Third Party Areas, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or

    c. by protest conducted on or from the highways on Plan 1A, obstruct those occasioning particular damage to the First, Second and Third Claimants and/or interfere with the First, Second and Third Claimants' right of access to Manchester Airport via those highways, so as to cause a nuisance actionable by the First, Second and Third Claimants.

36. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.

37. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:

    a. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.

    b. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive — by which point harm may already have occurred.

    c. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.

    d. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many tens or hundreds of millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.



e. The airports in the present case are all the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the Claimants are fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the Byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at Stansted Airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.

f. Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.

g. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND THE FIRST, SECOND AND THIRD CLAIMANTS CLAIM AGAINST THE FIRST DEFENDANT:

(1) Subject to periodic review by the Court on application by the Claimants at intervals not exceeding 24 months or such other period as the Court may determine, an order that the First Defendants must not, without the consent of the First, Second and Third Claimants (or either of them), enter, occupy or remain upon the land outlined in red on Plan 1.

AND THE FOURTH CLAIMANT CLAIMS AS AGAINST THE SECOND DEFENDANT:

(2) Subject to periodic review by the Court on application by the Claimants at intervals not exceeding 24 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent of the Claimants, enter, occupy or remain upon the land outlined in red on Plan 2.

AND THE FIFTH CLAIMANT CLAIMS AGAINST THE THIRD DEFENDANT:

(3) Subject to periodic review by the Court on application by the Claimants at intervals not exceeding 24 months or such other period as the Court may determine, an order that the Third Defendants must not, without the consent of the Claimants, enter, occupy or remain upon the land outlined in red on Plan 3.

STATEMENT OF TRUTH

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

I am duly authorised by the Claimants to sign this statement.



_____

Stuart Sherbrooke Wortley

Partner

Eversheds Sutherland (International) LLP

Claimants' solicitor

Title Schedule to the Particulars of Claim

1. The First Claimant is the registered proprietor of the following titles:-

Registered Title	Freehold / Leasehold
GM408669	Leasehold
GM724915	Leasehold
GM839013	Leasehold
MAN315638	Leasehold
CH373359	Leasehold
CH408609	Leasehold
CH408610	Leasehold
CH414019	Leasehold
CH469834	Leasehold
CH469835	Leasehold
CH593537	Leasehold
GM827720	Leasehold
GM869598	Leasehold
GM874357	Leasehold
GM874715	Leasehold
GM923439	Leasehold
MAN157825	Leasehold
MAN404429	Leasehold
MAN8976	Leasehold
MAN348640	Leasehold
MAN359310	Leasehold

2. The Second Claimant is the registered proprietor of the following titles:-

Registered Title	Freehold / Leasehold
GM513511	Freehold
MAN371404	Leasehold
MAN269014	Leasehold
MAN270740	Leasehold

3. The Third Claimant is the registered proprietor of the following title:-

Registered Title	**Freehold / Leasehold**
MAN371404	Leasehold

4. The Fourth Claimant is the registered proprietor of the following titles:

Registered Title	**Freehold / Leasehold**
EX438482	Freehold
EX574488	Freehold
EX574502	Freehold
EX574498	Freehold
EX574495	Freehold
EX574482	Freehold
EX574485	Freehold
EX574491	Freehold
EX574504	Freehold
EX574508	Freehold
EX574523	Freehold
EX948708	Freehold
EX574513	Freehold
EX640482	Freehold
EX574507	Freehold
EX574477	Freehold
EX574473	Freehold
EX438486	Freehold
AA7858	Leasehold
EX900137	Leasehold
EX976114	Leasehold

5. The Fourth Claimant also has a lease of the buildings known as 6002 and 6003 at Stansted Airport granted on 20 September 2022 and made between Airport Industrial GP Limited and Airport Industrial Nominees Limited which is unregistered and is shown coloured brown on Plan 2.

6. The Fifth Claimant is the registered owner of the following titles:-

Registered Title	**Freehold / Leasehold**
LT113826	Freehold
LT300968	Freehold
LT305941	Freehold
LT325861	Freehold
LT289774	Freehold

Manchester Airport - Plan 1A

- Injunction
- Carved Out Areas
- Partly Carved Out Areas
- Public Highway
- Underground Highway
- Railway



N

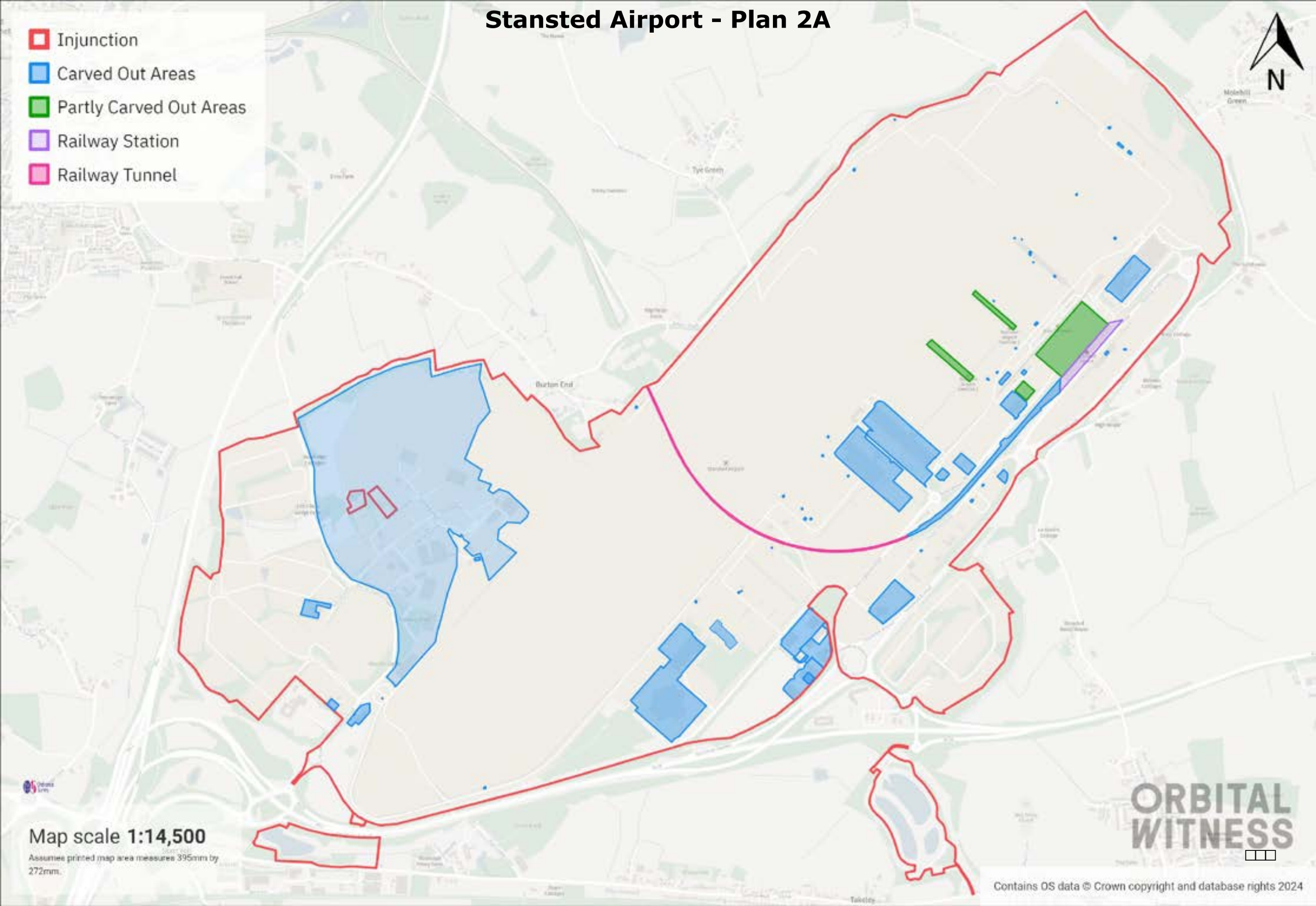
Map scale **1:21,803**

Assumee printed map area measures 395mm by 272mm.

ORBITAL WITNESS

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Stansted Airport - Plan 2A



East Midlands Airport - Plan 3A



CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-



(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v -

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

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimants' claim by the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON HEARING Leading and Junior Counsel for the Claimants

AND UPON each of the First, Second and Third Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

IT IS ORDERED THAT:

DEFINITIONS

1. "**Manchester Airport**" means the land shown outlined in red on Plan 1 to the Claim Form (including the highways therein), appended to this Order in Schedule 1 ("**Plan 1**").

2. "**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (https://www.manchesterairport.co.uk/injunction/) at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the First Defendants and each of them are forbidden from doing the following:

    a. Entering, occupying or remaining on any part of Manchester Airport without the consent of the First, Second and Third Claimants (or any of them);

    b. Affixing themselves to any other person or object on Manchester Airport;

    c. Impeding access to or enjoyment of Manchester Airport by the First, Second and Third Claimants (or any of them) and those authorised by the First, Second and Third Claimants (or any of them), whether by blocking any entrance or otherwise;

    d. Blocking or obstructing the free and safe passage of traffic onto or along or across the highways within Manchester Airport;

    e. Refusing to leave the aforesaid parts of the highways when asked to do so by a police constable, when contravening any of paragraphs 3(b) and/or (d);

    f. Continuing to do any act prohibited by paragraphs 3(a) to (e) above.

4. This Order is subject to periodic review by the Court on application by the First, Second and Third Claimants at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First, Second and Third Claimants shall take the following steps by way of service of copies of the amended

Claim Form, amended Particulars of Claim, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") upon the First Defendants:

a. Uploading a copy onto the following website: https://www.manchesterairport.co.uk/injunction/

b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.

c. Affixing a notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy.

6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the First Defendants by the First, Second and Third Claimants carrying out each of the following steps:

a. Uploading a copy of the Order onto the following website: https://www.manchesterairport.co.uk/injunction/

b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.

c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 1.

d. Affixing Warning Notices of A2 size at those locations marked with an "X" on Plan 1.

7. The taking of such steps set out at paragraph 5 and 6 shall been good and sufficient service of this Order and of the Claim Documents upon the First Defendants and each of them.

8. The Court will provide sealed copies of this Order to the First, Second and Third Claimants' solicitors for service (whose details are set out below).

9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

10. Service on the First Defendants of any further applications or documents in the proceedings by the First, Second and Third Claimants (or any of them) shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).

11. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the First, Second and Third Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com . If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the First, Second and Third Claimants' solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

13. The First, Second and Third Claimants (or any of them) have liberty to apply to vary, extend or discharge this Order or for further directions.

14. No acknowledgment of service, admission or defence is required by any party until further so ordered.

15. Costs are reserved.

COMMUNICATIONS WITH THE FIRST, SECOND AND THIRD CLAIMANTS

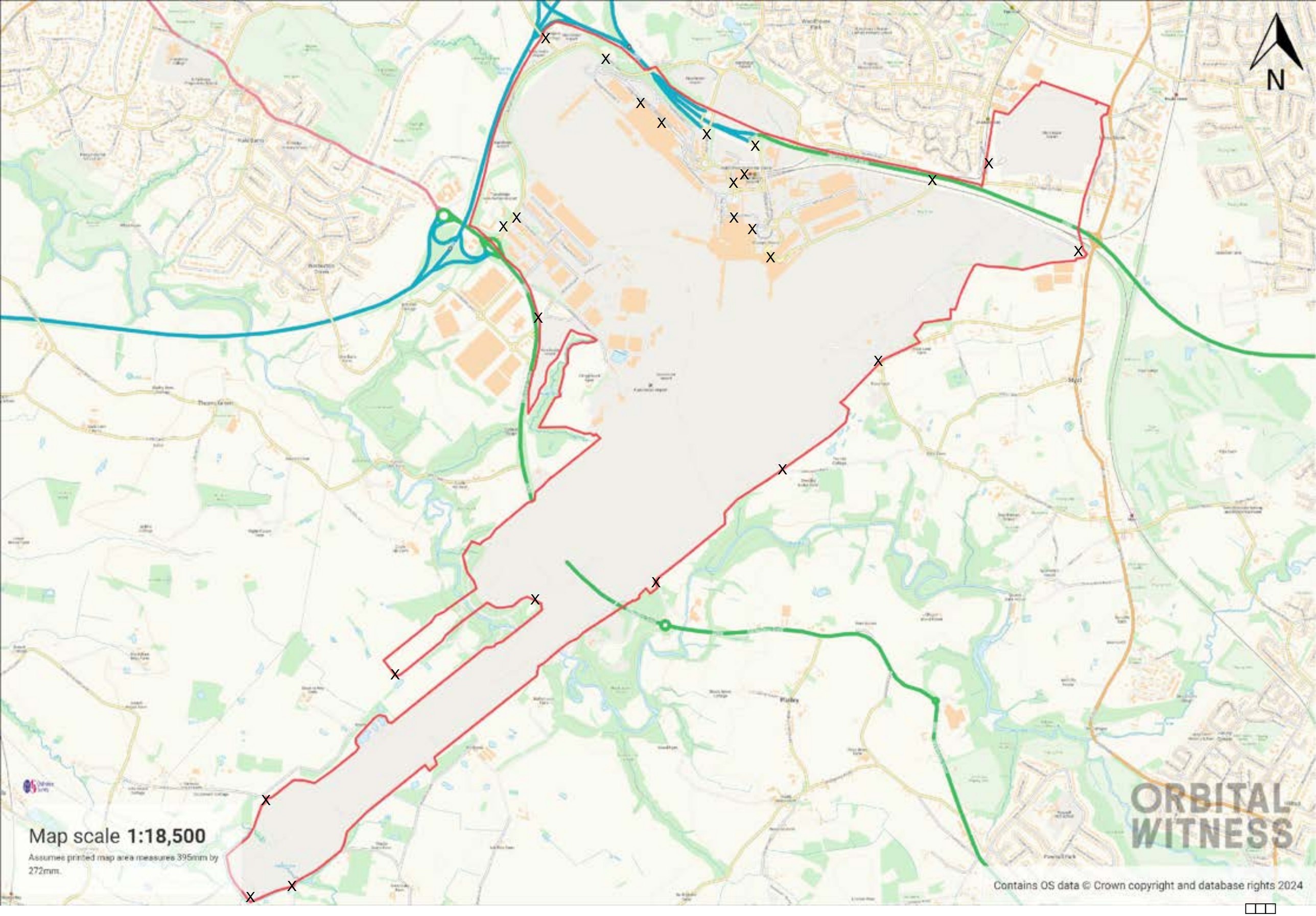
16. The First, Second and Third Claimants' solicitors and their contact details are:

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

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

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

SCHEDULE 1


N
Map scale 1:18,500
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST, SECOND AND THIRD

(1) The First, Second and Third Claimants will take steps to serve the First Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.

(2) The First, Second and Third Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.uk

SCHEDULE 4 – WARNING NOTICE

HIGH COURT CLAIM NO: KB-2024-002132

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

TO: Persons Unknown whose purpose is or includes protest on the premises at Manchester Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the "**Defendants**")

FROM: Manchester Airport Plc, Airport City (Manchester) Ltd, and Manchester Airport Car Park (1) Limited ("the **First, Second and Third Claimants**")

This notice relates to the land known as Manchester Airport, Manchester, M90 1QX which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the First, Second, and Third Claimants

2. Affixing themselves to any other person or object on the Airport.

3. Impeding access to or enjoyment of the Airport by the First, Second and Third Claimants or those authorised by the First, Second, and Third Claimants, whether by blocking access to any entrance or otherwise.

4. Blocking or obstructing the free and safe passage of traffic onto or along or across those parts of the highway show the red line outlined on the Plan;

5. Refusing to leave the parts of the highways on the Plan when asked to do so by a police constable, when contravening any paragraph 1 and/or 4.

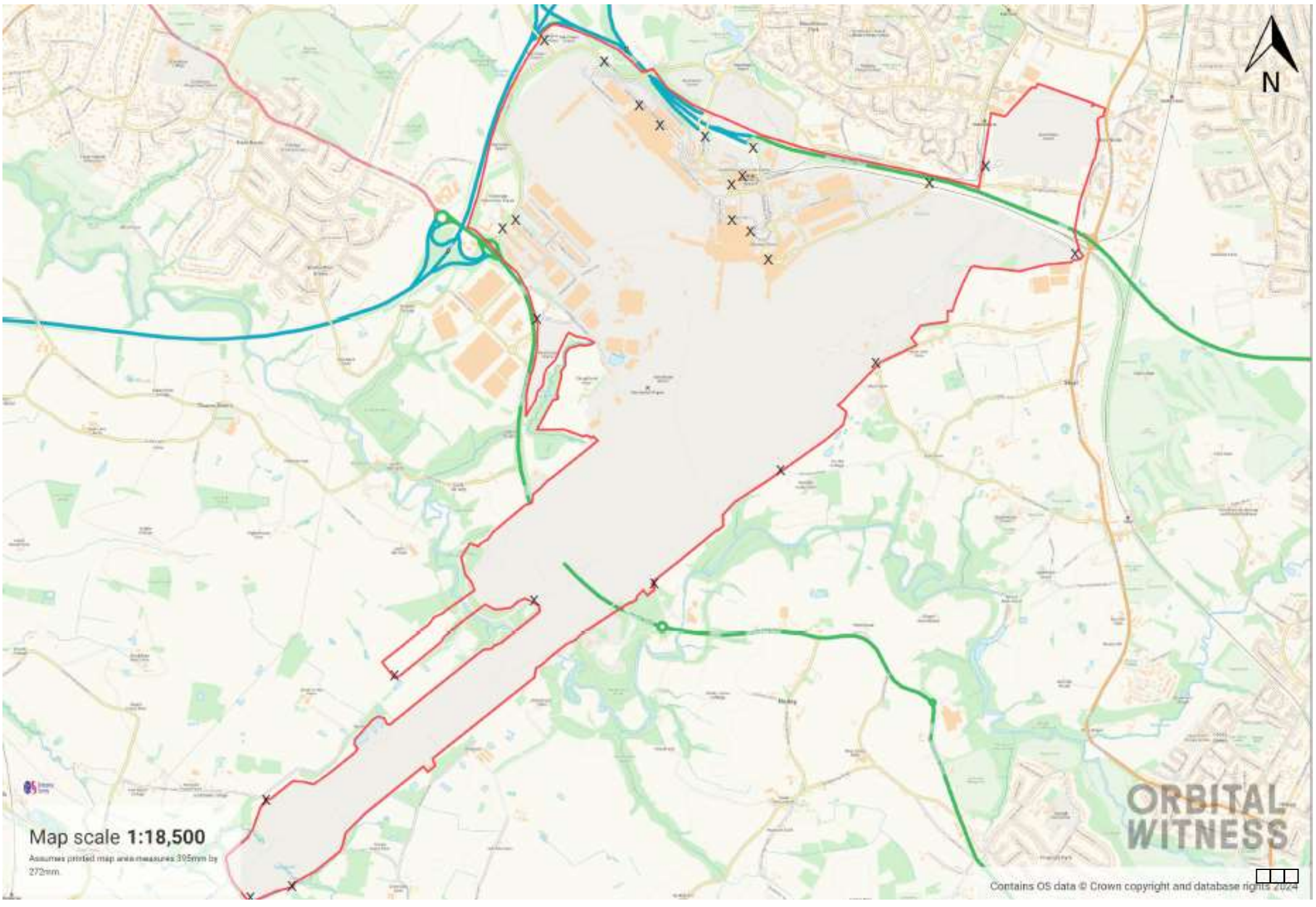
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First, Second and Third Claimants solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: https://www.manchesterairport.co.uk/injunction/

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email: StuartWortley@eversheds-sutherland.com



CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-



(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v -

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

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) **PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**

Defendants

ORDER

UPON the Claimants' claim by the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

AND UPON the Court granting the First to Third Claimant an injunction on 5 July 2024 ("**the Manchester Order**") in respect of the land shown outlined in red on Plan 1 to the Claim Form ("**Manchester Airport**")

AND UPON the Court granting the Fourth Claimant an injunction on 5 July 2024 ("**the Stansted Order**") in respect of the land shown outlined in red on Plan 2 to the Claim Form ("**Stansted Airport**")

AND UPON the Court granting the Fifth Claimant an injunction on 5 July 2024 ("**the EMA Order**") in respect of the land shown outlined in red on Plan 3 to the Claim Form ("**East Midlands Airport**")

IT IS ORDERED THAT:

PERMISSION TO AMEND

1. The Claimants have permission to amend the claim form and particulars of claim so as to refer to "Extinction Rebellion" in the name of the Defendants and shall file an amended Claim Form and amended Particulars of Claim.

THIRD PARTIES

2. By 19 July 2024, the First, Second and Third Claimants shall notify any persons who have a right or interest in Manchester Airport of the Manchester Order and provide a copy of the same to them by carrying out the following steps:
    a. Uploading a copy of this Order onto the following website: https://www.manchesterairport.co.uk/injunction/

b. Affixing a copy of this Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 1.

3. By 19 July 2024, the Fourth Claimant shall notify any persons who have a right or interest in Stansted Airport of the Stansted Order and provide a copy of the same to them by carrying out the following steps:

a. Uploading a copy of this Order onto the following website: https://www.stanstedairport.com/injunction

b. Affixing a copy of this Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 2.

4. By 19 July 2024, the Fifth Claimant shall notify any persons who have a right or interest in East Midlands Airport of the EMA Order and provide a copy of the same to them by carrying out the following steps:

a. Uploading a copy of this Order onto the following website: https://www.eastmidlandsairport.com/injunction/

b. Affixing a copy of this Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 3.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

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

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

CLAIM NO: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BETWEEN:-

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v -

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

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) **PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**

Defendants

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

Hearing commenced at 14:00.

The Judge had read the hearing bundle, the Claimant's skeleton argument, and he had received the authorities bundle.

TMKC introduced the case as one under the newly described jurisdiction which has been in the Supreme Court in Wolverhampton – sui generis relief against Persons Unknown.

TMKC addressed a misstatement in the skeleton argument in which it says that the third parties were asked about whether they would like to take part as joint Claimants. In fact, they were not

asked due to time pressure but there were miscommunications between TMKC and those instructing him.

Judge explained that if an Order is made as requested, it will presumably need to include provisions for the third parties to be notified.

Manchester Airport

Manchester Airport is a difficult area, but the "X" marked locations are where it is proposed to put notices.

TMKC referred to the Byelaws plan and how it cannot be used for the Injunction as it was not accurately drawn, as a result, C has attempted to duplicate the Byelaw map as if it had been done properly in producing the plans for the injunction (refers to witness statement of Mr Wortley).

TMKC described the title ownership of C at Manchester Airport and how the red line on Plan 1 falls within the land on Plan A, either as freeholders or leaseholders.

The effect of that in point of law is C's right to maintain trespass subject to certain exceptions (to be addressed later); such that no one has a right to be on that land except by C's consent.

TMKC, referring to witness statement of Mr Wortley (para 17) explained the carved out areas shown coloured blue, green and pink on Plan A etc.

TMKC explained that the carved out plans can create confusion, but it shows that in some instances C cannot claim trespass.

In order to make our claim good in trespass. Jurisdiction to give us relief on that basis.

TMKC explained the use of nuisance / threatened nuisance arising from the carved out areas, and an unreasonable use of land and the need for those areas to make the injunction in respect of the remaining land effective. TMKC uses example of protest at Stansted over a carved out area, which resulted in the runway being shut as a result of the risk of over-spill.

There were no trespass in that instance but the relief afforded by the injunction is still required.

Stansted Airport

TMKC explained that Plan 2 would be attached to the Order.

TMKC described the title ownership of C at Stansted Airport, and how the red line on Plan 2 falls within the land on Plan A, as either freeholder or leaseholder; third party areas are depicted in plan 2A.

TMKC explains there is no complication due to highways but there remains some complexity because floor plans in pockets of third party interests in different buildings at Stansted. Further, it would be inappropriate and misleading to treat the blue areas differently to the generality.

East Midlands Airport

TMKC explained Plan C, Plan 3 and the carved out plans.

TMKC explains why it is appropriate and necessary for us to be in receipt of the injunction in relation to trespass regarding the generality effective.

TMKC explained the effectiveness of injunctions in relation to other organisations (e.g. National Highways) but that campaigners have shifted their focus to airports. That has been manifested by pronouncements made expressly which Mr Wortley's statement sets out and the recent protest at Stansted.

TMKC disclosed the byelaws, relief of aggravated trespass and interference with national infrastructure. Those are available to the Airport, but the witness statement of Mr Wortley (para

42) includes evidence from which can be inferred that the protestors are willing to task risk in front of jury / magistrates but not a High Court judge.

TMKC explained how ineffective byelaws are for the type of action intended for the injunction to prevent – including the threshold of the punishment.

Legal tests / full and frank disclosure

TMKC referred to the cause of action.

TMKC addressed the duty of full and frank disclosure, including sufficient evidence to prove the claim, no realistic defence, *DPP v Zeigler*, damages not being an adequate remedy, and that if the injunction prohibits any conduct that is lawful, then it must be in a way that is no more than is proportionate.

The balancing exercise for the Judge in deciding whether to grant the injunction only needed to be done in public land (i.e. where there were highways) and clearly favoured the grant of an injunction.

TMKC referred to Leggatt LJ in *Cuadrilla* (endorsed in Court of Appeal in *Canada Goose* and Supreme Court in *Wolverhampton)* in relation to the third party area, makes the point that although the court must be careful not to impose an injunction in wider terms than are necessary to do justice, the court is entitled to restrain conduct that is not in itself tortious or otherwise unlawful if it is satisfied that such a restriction is necessary in order to afford effective protection to the rights of the claimant in the particular case. Leggatt LJ makes the point that there is nothing objectionable in principle in using intention to define the defendants. There will be need for C to prove the purpose is to protest (otherwise the claim to commit would fail)

The proposed title of the Defendants do not fall foul of *Hampshire Waste*. "Persons intending to trespass or trespass" – this did not capture people whether or not on the land (too wide). This claim only seeks people whose purpose is to protest.

Draft Order

TMKC guided the Judge through the draft Orders sought.

- Description of D:-
    - bespoke wording "or on any flight therefrom"
    - the only plausible explanation is the purpose of protest at airport or aeroplane at airport or aeroplane.
    - "whether in connection with JSO or otherwise" – if persons disavowed the campaign.
- Judge explored why other groups were not included in the definition of Ds, and suggested that other groups of which Cs are aware be added to that definition. TMKC agreed with the Judge and obtained permission to amend the Claim Form and POC.
- Para 3, with immediate effect – sometimes says until [date] in the future. One way of giving effect of temporal certainty. Your ladyship's decision.
- Judge concluded that reviews after 24 months is too long, but will reduce to 12 months.
- Judge confirms that the claim is best to be served rather than notification.

Judgment at 15:34

Pursuant to Supreme Court's decision in *Wolverhampton* and the decision in *Valero*, principles are quite clearly set out now.

Cs are those who own 3 airports in the UK. Manchester, Stansted and East Midlands Airport. Ds who are persons unknown are those who, as described in POC, and which permission has been given to amend.

Ds are people who feel strongly that fossil fuel use should cease and are engaged in a campaign of protest at various locations. Already well reported protests have caused significant disruption. Those involved are active on the internet and have indicated that this particular summer they have an intention to continue this protest at airports (as seen in the evidence of Mr McBride and Wortley).

They intend to cause disruption in the summer and they consider this consider that this could be scope for some publicity for the campaign. In light of that Cs have brought applications such as these. Newcomer application, in the sense that the PU are those who cannot be identified but are identifiable by purpose. The sui generis were specifically addressed in *Wolverhampton* in the Supreme Court. The principles are much clearer and further clarified by Mr Justice Ritchie. In short form, Court must be satisfied that there is a compelling need for the injunction of this kind. I am satisfied that I have been taken very carefully through the areas of protection of injunctions has been sought. Referred to plans 1 and 2 in Manchester and Stansted, and 3 in East Midland. The land in question is owned by various Cs.

There are complications with claims for trespass, as there are various leases and licences which give right to others to occupy. Cs do not have an immediate right to possession and therefore the claim in trespass cannot be supported for all of the land.

Considerable work has been done by Cs. Land is in ownership of Cs. Premise is that if an injunction is granted only on basis of land which is owned, that would not provide a practical solution but by reference to authorities that Cs are entitled to these applications where it is necessary to make that which they seek effective. The risk is that any protestor will nonetheless threaten nuisance spilling out onto land they do own. There are examples of that already occurring for protestors within this category.

It is appropriate to do so in respect of all of this land shown on Plans 1, 2 and 3. And authorities make that quite straightforward. I have to be satisfied that there is a compelling need here. Satisfied here of compelling need.

Injunctions are necessary and proportionate and there is clear evidence of threat and intention to target airports, in a way that has already been targeted. Examples were given of Gatwick airport. Experience at Stansted with wire cutters. The threat is real and imminent and already manifested itself.

Consequences are of particular significance: Airports are sensitive places where security is paramount. This sort of disruption. Delay or disruption but also increased sensitivity from evidence of Mr McBride because targets for terrorists. Airports have to respond because this could be a mask for a terrorist activity. Damage to aircraft and other security issues and significant financial repercussions.

Also, I should take into account what arguments Ds might have raised. This is a without notice application and they are not here– it does not mean should not take that into account. Ds have been arrested for various criminal offences – Criminal Justice and Public Order Act and Public Order Act. Similarly, there are byelaws. The disadvantage is that they are enforceable after the action has taken place. The criminal system does not prevent action in the way that an injunction does. Scope for prosecution is not a remedy for Cs.

Should have said before that I have been referred to the point about tipping off and satisfied that appropriate to make the application without notice. The Claimants have not only given full and frank but have gone to some length to set out what might have been said. Included byelaws.

I am satisfied that necessary to make the injunctions and there is a compelling need.

Legal approach – I would cite the section of Mr Justice Ritchie in *Valero* – the matters I need to be satisfied about. Hard to see what particular harm to the PU in preventing them from carrying out the sort of protest over land which is privately owned.

In the interests of putting everything before the Court, Cs in Manchester Airport have referred to the fact that there are highways. There is a right to public generally and so therefore have to take into the rights of the protestors under the ECHR, particular Arts 10 and 11.

There is a need to consider when the balancing exercise that any interference is something which would cause me not to make this order. Right to peaceful protestation are to be protected do not include the deliberate and criminal behaviour which is the threat here.

The need remains compelling and any interference does not outweigh the need for the injunction.

Cs have agreed to provide a standard undertaking in damages. As part of the injunction, and if there is anyone they would be able to seek a remedy to damages.

In those circumstances, it is appropriate to make the orders sought. I should say that: appropriate for the definition of Ds to include any other organisation of which Cs are aware and have a website or email address.

This is not a case where it is appropriate to have an interim order with return in 2 weeks. As was set out in *Wolverhampton*, this is sui generis. As far as interim or final orders are concerned, anyone has a right to come and have the order discharged or varied. Indicated that this will be reviewed, rather than to last for, in 12 months, which is sufficient to cover off the threat. Reflect the sequential nature of the campaigns organised at various location.

Third parties with interests at the airports should be notified.

Hearing concluded at 16:00.

Certificate of service

Name of court	Claim No.
IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION	KB-2024-002132
Name of Claimant Manchester Airport PLC and others	
Name of Defendant Persons Unknown (as more particularly described in the Claim Form)	

On what day did you serve? 23/07/2024

The date of service is 23/07/2024

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Amended Claim Form dated 05.07.24 (sealed by the Court on 22.07.24) and Amended Particulars of Claim

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Persons Unknown

How did you serve the documents?
(please tick the appropriate box)

- ☐ by first class post or other service which provides for delivery on the next business day
- ☐ by delivering to or leaving at a permitted place
- ☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*
- ☑ by other means permitted by the court *(please specify)*

  at paragraphs 5 - 6 of the Order dated 5.7.24, the last step for service was completed on 23.07.24
- ☐ by Document Exchange
- ☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*
- ☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

(1) Web:https://www.manchesterairport.co.uk/about-us/injunction
(2) Emails:juststopoil@protonmail.com; juststopoilpress@protonmail.com; info@juststopoil.org; and enquiries@extinctionrebellion.uk
(3) Site: Manchester Airport, Manchester M90 1QX

Being the
- ☐ claimant's
- ☐ defendant's
- ☐ solicitor's
- ☐ litigation friend

- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
- ☐ last known place of business
- ☐ last known principal place of business
- ☐ principal office of the partnership
- ☐ principal office of the corporation
- ☐ principal office of the company
- ☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- ☑ other *(please specify)*

  (1) C1-3's webpage; (2) D's email addresses; and (3) C1-3's Premises

I believe that the facts stated in this certificate are true.

Full name: Muhammad Nusrullah Nawaaz Allybokus

Signed: 

(Claimant) ~~(Defendant)~~ ('s solicitor) ~~(Litigation friend)~~

Position or office held: Associate Solicitor

(If signing on behalf of firm or company)

Date: 23/07/2024

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Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim
A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	**Deemed day of service**
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court	Claim No.
IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION	KB-2024-002132
Name of Claimant Stansted Airport Ltd and others	
Name of Defendant Persons Unknown (as more particularly described in the Claim Form)	

On what day did you serve? 23/07/2024

The date of service is 23/07/2024

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Amended Claim Form dated 05.07.24 (sealed by the Court on 22.07.24) and Amended Particulars of Claim

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Persons Unknown

How did you serve the documents?
(please tick the appropriate box)

- ☐ by first class post or other service which provides for delivery on the next business day
- ☐ by delivering to or leaving at a permitted place
- ☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*
- ☑ by other means permitted by the court *(please specify)*

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- ☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

(1) Web: https://www.stanstedairport.com/about-us/injunction/
(2) Emails: juststopoil@protonmail.com; juststopoilpress@protonmail.com; info@juststopoil.org; and enquiries@extinctionrebellion.uk
(3) Site: Bassingbourn Rd, Stansted CM24 1QW

Being the
- ☐ claimant's
- ☐ defendant's
- ☐ solicitor's
- ☐ litigation friend

- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
- ☐ last known place of business
- ☐ last known principal place of business
- ☐ principal office of the partnership
- ☐ principal office of the corporation
- ☐ principal office of the company
- ☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- ☑ other *(please specify)*

  (1) C4's webpage; (2) D's email addresses; and (3) C4's Premises

I believe that the facts stated in this certificate are true.

Full name: Muhammad Nusrullah Nawaaz Allybokus

Signed: [signature]

(Claimant) ~~(Defendant)~~ ('s solicitor) ~~('s litigation friend)~~

Position or office held: Associate Solicitor

(If signing on behalf of firm or company)

Date: 23/07/2024

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Certificate of service

Name of court	Claim No.
IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION	KB-2024-002132
Name of Claimant East Midlands International Airport and others	
Name of Defendant Persons Unknown (as more particularly described in the Claim Form)	

On what day did you serve? 23/07/2024

The date of service is 23/07/2024

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Amended Claim Form dated 05.07.24 (sealed by the Court on 22.07.24) and Amended Particulars of Claim

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Persons Unknown

How did you serve the documents?
(please tick the appropriate box)

- ☐ by first class post or other service which provides for delivery on the next business day
- ☐ by delivering to or leaving at a permitted place
- ☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*
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  at paragraphs 5 - 6 of the Order dated 5.7.24, the last step for service was completed on 23.07.24
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- ☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

(1) Web:https://www.eastmidlandsairport.com/about-us/injunction/
(2) Emails:juststopoil@protonmail.com; juststopoilpress@protonmail.com; info@juststopoil.org; and enquiries@extinctionrebellion.uk
(3) Site: East Midlands Airport, Castle Donington, Derby DE74 2SA

Being the ☐ claimant's ☐ defendant's ☐ solicitor's ☐ litigation friend

- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
- ☐ last known place of business
- ☐ last known principal place of business
- ☐ principal office of the partnership
- ☐ principal office of the corporation
- ☐ principal office of the company
- ☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- ☑ other *(please specify)*

  (1) C5's webpage; (2) D's email addresses; and (3) C5's Premises

I believe that the facts stated in this certificate are true.

Full name: Muhammad Nusrullah Nawaaz Allybokus

Signed: 

(Claimant) ~~(Defendant)~~ ('s solicitor) ~~(Litigation friend)~~

Position or office held: Associate Solicitor

(If signing on behalf of firm or company)

Date: 23/07/2024

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N244

Application notice

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

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

Name of court **The High Court of Justice** **King's Bench Division**	**Claim no.** **KB-2024-2132**
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
	H W F - - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Manchester Airport Plc and others	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	2 June 2025 02 Jun 2025

HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
KB-2024-002132

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

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

   If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?
   1. To list a hearing (time estimate 1 day) to review the injunction made by order of Her Honour Judge Coe KC dated 5 July 2024, on 20 June 2025 or as close to that date as is convenient for the Court.

   2. To consolidate the claim under CPR rule 3.1(2)(h), alternatively case manage and hear it under rule 3.2(i) and/or (p) with the following claims:
   (a) London City Airport Ltd and ors v PU - claim no KB-2024-001765;
   (b) Leeds Bradford Airport Ltd and ors v PU - claim no KB-2024-002317; and
   (c) Birmingham Airport Ltd and ors v PU - claim no KB-2024-002473 ("**the Other Airports Claims**").

4. Have you attached a draft of the order you are applying for? ☒ Yes ☐ No

5. How do you want to have this application dealt with? ☐ at a hearing ☒ without a hearing
   ☐ at a remote hearing

6. How long do you think the hearing will last? ☐ Hours ☐ Minutes
   Is this time estimate agreed by all parties? ☐ Yes ☐ No

7. Give details of any fixed trial date or period: N/A

8. What level of Judge does your hearing need? High Court Judge

9. Who should be served with this application?

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

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

☐ the attached witness statement

☐ the statement of case

☒ the evidence set out in the box below

If necessary, please continue on a separate sheet.

1. The order of Her Honour Judge Coe KC is attached, together with the orders made by:-

   (a) Julian Knowles J dated 20 June 2024 made in claim no KB-2024-001765

   (b) Ritchie J dated 18 July 2024 (and amended pursuant to the slip rule on 19 and 22 July 2024) made in claim no KB-2024-00217; and

   (c) Jacobs J dated 6 August 2024 made in claim no KB-2024-002473.

The review hearing

2. Paragraph 4 of the Order of Her Honour Judge Coe KC in the instant case provides for the Order to be reviewed "… at intervals not exceeding 12 months".

3. The Claimants invite the Court to list the review hearing pursuant to paragraph 3 of that order on 20 June 2025 or as soon as is convenient thereafter.

4. No time estimate was provided for in the order of Her Honour Judge Coe KC.

Consolidation / case management with the Other Airports Claims

5. All of the injunctions granted in the Other Airports Claims are subject to review at 12 month intervals and the Claimants in those cases also seek review of the injunctions and have, by Eversheds Sutherland (International) LLP also made applications of even date to this application (and also for consolidation or case management with this case and the Other Airports Claims.

6. In those cases:-

   (a) Paragraph 3 of the Order of Julian Knowles J made in claim number KB-2024-001765 provides for a time estimate of 1.5 hours for the hearing of the review application made in that claim.

   (b) Paragraph 2 of the order of Jacobs J dated 6 August 2024 made in claim number KB-2024-002473 provides a time estimate of 2.5 hours for the hearing of the review of the injunction made in that claim.

   (c) No time estimate is provided in Ritchie J's order. However, it is anticipated that a similar time estimate would be required.

7. In view of the similarity of factual and legal issues in this claim and the Other Airports Claims, it would be beneficial for the claims to be consolidated, alternatively case managed and heard together, in order to determine the cases in accordance with the overriding objective and in specific to (a) minimise the demands placed on the court resources by a multiplicity of hearings which would require more than a day of court time; and (b) avoid the risk of inconsistent decisions.

8. The Court is invited to make an order on the papers in the form of the draft order. The Claimants will notify the Defendants of any order made by the Court and the application following the making of the order.

☐☐☐

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

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

☒ No

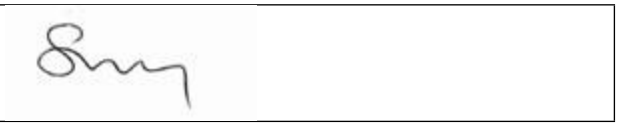
Statement of Truth

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

☒ **I believe** that the facts stated in section 10 (and any continuation sheets) are true.

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

Signature



☐ Applicant

☐ Litigation friend (where applicant is a child or a Protected Party)

☒ Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
2	June	2025

Full name

Stuart Sherbrooke Wortley

Name of applicant's legal representative's firm

Eversheds Sutherland (International) LLP

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

Partner

Applicant's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Greater London

Postcode

E	C	2	V	7	W	S

If applicable

Phone number

0771 288 1393

Fax phone number

DX number

Your Ref.

SSW/AW/EP/077654.0001167

Email

stuartwortley@eversheds-sutherland.com

Party: *Claimants*
Name: *S S Wortley*
Number: *Second*
Date: *06.06.25*
Exhibits: *"SSW17" – "SSW22"*

CLAIM NO: KB-2024-0002132

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

I STUART SHERBROOKE WORTLEY of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a partner in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants.

2. On 05.07.24, Her Honour Judge Coe KC granted injunctions to restrain the Defendants from entering, occupying or remaining on Manchester Airport, Stansted Airport and East Midlands Airport (as defined in those Orders) until varied, discharged or extended by further order. Each of the Orders also prohibited further acts adopted by activists engaged in direct action namely:-

   (a) affixing themselves to any other person or object;

(b) impeding access to or enjoyment of the Airport;

(c) blocking or obstructing traffic; and

(d) refusing to leave when asked to do so by a police constable.

3. Paragraph 4 of the Orders provided for each of those injunctions to be reviewed by the Court periodically at intervals not exceeding 12 months.

4. I make this witness statement for the purposes of the review hearing which has been listed on 24.06.25.

2024 Airport Injunctions

5. Between 20.06.24 and 14.08.24, the following injunctions were granted to protect airports against environmental protestors opposed to the use of fossil fuels.

	Airport	**Action Number**	**Judge / Date of Order**
1	London City Airport	KB-2024-001765	Mr Justice Julian Knowles 20 June 2024
2	Manchester Airport Stansted Airport East Midlands Airport	KB-2024-002132	HHJ Rosalind Coe 5 July 2024
3	Heathrow Airport	KB-2024-002210	Mr Justice Julian Knowles 10 July 2024
4	Leeds Bradford Airport Luton Airport Newcastle Airport	KB-2024-002317	Mr Justice Ritchie 18 July 2024
5	Gatwick Airport	KB-2024-002336	Mr Justice Ritchie 19 July 2024
6	Birmingham Airport Bristol Airport Liverpool Airport	KB-2024-002473	Mr Justice Jacobs 6 August 2024
7	Southend Airport	KB-2024-002596	Mrs Justice Farbey 14 August 2024

6. Last year it was possible to achieve a certain amount of co-ordination with a view to saving costs and limiting the demands placed by these matters on Court resources, in that my firm acted in 4 out of the 7 actions listed above (numbers 1, 2, 4 and 6). However, our instructions arrived over time rather than all at once, and so multiple hearings were needed, despite the common ground between the different matters.

7. Although the precise terms of the Orders vary slightly, each of the injunctions granted in actions 1, 2, 4 and 6 in the table effectively provides for an annual review.

8. This year, therefore, there is the potential to achieve better co-ordination with a better use of the Court's time: Manchester, London Stansted and East Midlands Airports and the 7 other airports involved in actions 1, 4 and 6 have decided to join together and to ask the Court to undertake the annual review at the same hearing. I was not instructed in relation to the other airports last year (Heathrow, Gatwick and Southend): I believe they remain represented by other firms of solicitors. I understand that the solicitors for Heathrow and Southend Airports have arranged a review hearing sometime next month.

9. The Order in action 1 provided for a review hearing of 1.5 hours duration and the Order in action 6 provided for a review hearing of 2.5 hours duration. The Orders in this action and action 4 did not specify a time estimate for the review hearing. The Court has now listed the review hearings in all 4 actions together, with a time estimate of 1 day on 24.06.25.

10. I make this witness statement in support of the review of the Manchester, London Stansted and East Midlands Airport injunctions. I will be repeating or adopting much of the content of this witness statement in my statements in support of the annual reviews of the injunctions granted in the other actions.

Service of the Order dated 05.07.24

11. Each of the Orders dated 05.07.24 was served in accordance with paragraph 5 and in each case the last step took place on 12.05.24. My former colleague Nawaaz Allybokus filed Certificates of Service (one for each airport) dated 23.07.24.

12. At the hearing on 05.07.24, the description of the Defendants was amended to add reference to Extinction Rebellion. The Amended Claim Form and Amended Particulars of Claim was served in accordance with paragraph 5 on 23.07.25. My former colleague Nawaas Allybokus filed Certificates of Service (one for each airport) dated 23.07.24.

The Plans

13. I am informed by David McBride, Head of Legal (Airports) for Manchester Airports Group that there have been no changes to the:-

    13.1. Manchester Airport Byelaws 2024 and that the Plan attached to the Manchester Airport Order dated 05.07.24 remains accurate.

    13.2. Stansted Airport – London Byelaws 1996 and that the Plan 2 attached to the Stansted Airport Order dated 05.07.24 remains accurate.

    13.3. East Midlands Airport Byelaws 2001 and that the Plan attached to the East Midlands Airport Order dated 05.07.24 remains accurate.

UK Airport Protests

14. The table below records a summary of the protests against UK airports which took place in June – August 2024. It also includes a summary of the arrests, convictions and subsequent sentencing and other relevant incidents occurring after August 2024.

02.06.24	Extinction Rebellion conducted a protest at Farnborough Air Show which involved blocking the 3 main gates and parking the Extinction Rebellion pink boat across the Gulfstream gate
20.06.24	Two JSO activists sprayed 2 aircraft at London Stanstead Airport with orange paint after cutting through the perimeter fence at around 5.00 am
25.06.24	Four JSO activists were arrested at Gatwick Airport railway station equipped with suitcases containing bandages (suspected to have been intended to force the airport to close owing to the risk of damage to aircraft engines in the event of them being released near aircraft)
27.06.24	Six JSO activists were arrested at a meeting in London pursuant to powers in the Public Order Act 2023
19.07.24	Roger Hallam (along with four other JSO activists) had been found guilty of conspiring to organise protests to block the M25 motorway in November 2022 Mr Hallam was sentenced to 5 years imprisonment and each of the others were sentenced to 4 years imprisonment (reduced by the Court of Appeal on 07.03.25 – see below)
24.07.24	Ten JSO activists were arrested at Heathrow Airport as part of an intelligence led operation - some were equipped with cutting gear and glue

27.07.24	A protest which was due to be held at London City Airport was relocated to the Department of Transport on Horseferry Lane
29.07.24	Eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure
30.07.24	Two JSO activists were arrested at Heathrow Airport after spraying orange paint around the Terminal 5 entrance hall and on the destination boards in the departure lounge
31.07.24	A protest by JSO and Fossil Free London was held at the Docklands Light Railway station at City Airport JSO and Fossil Free London both uploaded photographs of the protest with the following message:- *"We've been served with an injunction which means even walking out of the wrong exit of this station could get us arrested."*
01.08.24	Six JSO activists blocked access to the departure gates at Heathrow Terminal 5
05.08.24	Five JSO activists were arrested on their way to Manchester Airport equipped with bolt cutters, angle grinders, glue, sand and banners carrying slogans including "oil kills".
16.01.25	The trial of the two JSO activists arrested at Heathrow Airport on 30.07.24 resulted in a hung jury
02.02.25	Extinction Rebellion held a demonstration at Farnborough Airport following a consultation period in relation to Farnborough Airport's expansion plans which ended in October 2024
17.02.25	Extinction Rebellion held a demonstration at Inverness Airport waving banners with *"Ban Private Jets"* and *"We're in a climate emergency, we need to step up and take action"*
21.02.25	Of the five JSO activists arrested on their way to Manchester Airport on 05.08.24, four were found guilty of conspiracy to commit a public nuisance and one was acquitted with sentencing adjourned to 23.05.25
07.03.25	The Court of Appeal delivered judgment in a conjoined appeal by sixteen JSO activists against sentencing Two of the sentences passed on 19.07.24 were reduced by 18 months (from 4 years to 30 months), the other three were reduced by a year (from 5 to 4 years in Roger Hallam's case and from 4 to 3 years in the other two) Of the other eleven appeals, one was reduced by 2 months but the other ten appeals were dismissed

20.03.25	Of the ten JSO activists arrested at Heathrow Airport on 24.07.24, nine were found guilty of conspiracy to cause a public nuisance at Heathrow Airport with sentencing adjourned to 16.05.25
27.03.25	Just Stop Oil announced the end of their campaign (see below)
27.03.25	On the same day as the JSO announcement, Youth Demand held a meeting to discuss issues including the climate crisis and a fresh wave of civil resistance in London in the Westminster Quaker Meeting House Six individuals were arrested
27.04.25	Youth Demand activists threw bright pink powder over elite runners participating in the London marathon as they crossed Tower Bridge The individuals taking part wore T-shirts that read "Youth Demand – Stop Arming Israel" – which appears to be their primary cause
16.05.25	Of the nine individuals convicted on 20.03.25, five were sentenced to terms of imprisonment of up to 15 months and four were given suspended sentences
27.05.25	Each of the four individuals convicted on 21.02.25 was sentenced to a term of imprisonment of between 18 and 30 months

15. Copies of media articles relating to the events recorded in this table are attached to this statement marked **"SSW17"**.

16. A copy of the Court of Appeal decision handed down on 07.03.25 is attached at **"SSW18"**.

17. The fact that the protest on 27.07.24 was relocated from London City Airport to the Department of Transport and the fact that the JSO and Fossil Free London protestors conducted their protest from outside the red line of the injunction plan demonstrate that the injunction granted by Mr Justice Julian Knowles in that case on 20.06.24 served its purpose. In both instances peaceful protests were went ahead but without causing unlawful interference to users of London City Airport.

27.03.25 – JSO Announcement

18. As noted in the chronology above, on 27.03.25, Just Stop Oil made the following announcement:-

> *"Three years after bursting on the scene in a blaze of orange, at the end of April we will be hanging up the hi vis.*

Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful.

So it is the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison. We have exposed the corruption at the heart of our legal system, which protects those causing death and destruction while prosecuting those seeking to minimize harm. Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK's oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen.

This is not the end of civil resistance. Governments everywhere are retreating from doing what is needed to protect us from the consequences of unchecked fossil fuel burning. As we head towards 2°C of global heating by the 2030s, the science is clear: billions of people will have to move or die and the global economy is going to collapse. This is unavoidable. We have been betrayed by a morally bankrupt political class.

As corporations and billionaires corrupt political systems across the world, we need a different approach. We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Nothing short of a revolution is going to protect us from the coming storms.

We are calling on everyone who wants to be a part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. Sign up here. See you on the streets.

ENDS"

19. Copies of media articles relating to this announcement and to the "final" JSO protest which took place in central London on 26.04.25 are attached marked **"SSW19"**.

18.05.25 - We are "plotting a very big comeback"

20. Whilst the announcement referred to above suggests that the risk of unlawful protests at UK airports has reduced, on 18.05.25 the following story appeared on GB News (both on television and on-line):-

> *"Now, I was getting pretty bored of the juvenile antics at the altar of climate change.*
>
> *We've seen it all vandals throwing soup over priceless artworks in galleries, defacing Stonehenge, ambushing theatre productions in the West End, blocking traffic, scaling motorway gantries, dousing private jets in paint, and even disrupting sports events all just to spoil the fun for everyone else.*

Remember them? They said they were disbanding after the government appeared to adopt their demand to end new oil and gas licences in Britain. Their actions, of course, cost the public tens of millions in police and court time.

But despite Ed Miliband bowing to their demands, I can exclusively reveal that Just Stop Oil is plotting a very big comeback.

On Ben Leo Tonight, we have gained access to secret Just Stop Oil meetings, where members are discussing a dramatic U-turn—planning to cause chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and even carrying out "citizens' arrests" on so-called climate criminals.

Speaking during an online meeting on Thursday night, one coordinator—known only as "Dave"—said protests should remain "action-based" and warned against becoming more peaceful, like Greenpeace.

The meeting continued with Dave insisting that it was essential to keep doing what he called the "spicy and naughty stuff" to generate media attention.

The group also discussed how to feed new protest ideas back to what they referred to as a "core team". There was frustration over communication with this mysterious leadership group, with some suggesting using 50-word briefs to make it easier for them to process ideas.

It raises serious questions: Who exactly is this core team? Who are these professional protesters reporting to—and who's funding them?

Chillingly, the group also spoke about carrying out citizen's arrests on so-called climate deniers. There was some introspection as well, with members questioning whether their public image was doing more harm than good.

But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to proceed with Just Stop Oil's revival, including talk of keeping protesters in safe houses to maintain morale.

Let's be clear: what we're dealing with here is a group of climate zealots plotting to commit criminal acts, backed by who knows what kind of funding, and being housed like some kind of eco-mafia.

And speaking of coordination—let's not pretend the climate agenda is a spontaneous grassroots movement. It's organised. It's funded. It's political.

So, who's paying to bus these protesters from London to Stonehenge, to airports, to art galleries and sports stadiums? Who's funding the Just Stop Oil safe houses where these scruffy, self-righteous agitators meticulously plan how to make Britain colder and poorer?

The police and the government must crack down on Just Stop Oil's plans for criminality before they gain traction again.

The last thing Britain needs is more disruption, more vandalism, and more self-indulgent eco-activism especially when a Labour government is already happily marching to the drumbeat of Net Zero extremism.

We'll be passing our findings to the police."

21. Far from distancing itself from this story, on 21.05.25 JSO circulated a link to the GB News story in a message to subscribers together the following comment:-

"GB News was right for once. We are "plotting a very big comeback".

22. Copies of the GB News story and the JSO message to subscribers are attached to this message marked **"SSW20"**.

Other Environmental / Climate Campaign Groups

23. Apart from JSO, there are other protest groups who are opposed to the use of fossil fuels including for example, Youth Demand (the junior branch of JSO formerly known as Youth Climate Swarm), Extinction Rebellion and Fossil Free London.

24. Extinction Rebellion ("XR") remains an active organisation both in the UK and internationally:-

24.1. on 07.09.24, XR activists chained themselves to the gates of the Rijksmuseum in Amsterdam in an attempt to force the museum to sever ties with ING Bank;

24.2. on 25.09.24, XR activists covered the Finnish Parliament House with red paint;

24.3. on 23.05.25, XR activists held a climate protest against Total Energies and its partners – including the occupation of BNP Paribas' offices in Paris.

25. Fossil Free London is another protest group involved in direct action. Their website includes videos which promote the right protest and training videos relating to direct action.

26. A relatively new organisation which is campaigning against the fossil fuel industry is "shut the system". In January 2025, this group cut fibre optic cables to Lloyds of London and prominent buildings involved in the insurance sector on Fenchurch

Street, Threadneedle Street, Leadenhall Street and Lime Street in London (and in Birmingham, Leeds and Sheffield).

27. An article concerning this story is attached to this statement marked **"SSW21"**.

Police Advice

28. On 21.05.25, the Metropolitan Police sent an email to the security team at London City Airport which included the following:-

> *" … the injunction at HAL [Heathrow Airport Limited] had a real impact on the Shell protest yesterday and builds on your experiences. To remove an injunction now would open up to further protest and whilst JSO have stepped down there appears to be a cycle of new groups emerging and this cannot be ruled out so maintaining it would be very much recommended."*

29. I believe the reference to *"… the Shell protest …"* relates to the Annual General Meeting of Shell plc held at the Soffitel Hotel at Heathrow Terminal 5 on 20.05.25. The Metropolitan Police told London City Airport's security team that a protest by environmental protest groups:-

> "*were forced to hold their protest at the Shell head office in central London rather than the AGM location at a hotel within the Heathrow Airport injuncted area, in order to avoid the risk of associated penalties for breaching of the injunction*."

30. I believe the references to *"… your experiences …"* is a reference to the events referred to in paragraph 19 above – including the fact that one of the protests due to take place at London City Airport was relocated to the Department of Transport.

31. A copy of the email (from which I have redacted personal information) is attached to this statement marked **"SSW22"**.

Conclusion

32. I am informed by David McBride and believe the Claimants' directors have concluded that they should ask the Court to extend the injunction for a further 12 months. I understand that they reached this decision after having considered carefully whether the threat which was clearly present last year has abated materially, especially in light of the JSO announcement in March.

33. Obviously, the question of whether the injunction has outlasted its need, is one for the judgment of the Court. However, based on the material to which I have referred, the Claimants (and, for what it is worth, I also) consider that there remains a compelling need for the injunction to remain in place. Climate change remains firmly on the political agenda. It continues to attract strong feelings and is still a subject about which campaigners are willing to contemplate disruptive action. The inference drawn by the Claimants (and by me) is that the injunctions granted over time have influenced the pattern of protest, which disruptive action being focused principally on targets which do not have the benefit of the Court's protection by way of injunction. The Claimants (and I) consider that the risk remains high that airports generally, including theirs, would come back into focus, if the injunction were now to be lifted. JSO's seeming change of heart in March 2025 was not adopted by all other campaign groups; and even as a statement of JSO's position, later events have shown that it was not an immutable repudiation of disruptive protest. The Claimants (and I) cannot discount the possibility, that JSO's March 2025 announcement may have been partly tactical: to make renewal of the injunctions harder — and disruptive protest at the airports correspondingly less risky. The risks are especially acute at this time of year: most of the incidents in which UK airports were targeted by environmental protestors in 2024 occurred between late June and August 2024 - the busiest period for holiday travel.

Notice of the Review Hearing

34. The Claimants intend to give notice of the review hearing in the manner provided for in para 5 of Orders dated 05.07.24 – namely by:-

    34.1. uploading copies of the application dated 02.06.25, the draft Order, a copy of this witness statement and exhibits and details of the review hearing to the injunction website;

    34.2. sending copies of the documents referred to in the previous paragraph to the 4 email addresses referred to in Schedule 3 to the Order dated 05.07.24 plus the following additional email addresses (noting that "Shut The System" does not operate a website and although "Fossil Free London" does have a website, this does not include an email address):- YouthDemandPress@protonmail.com

34.3. affixing a notice at each of the warning notice locations for each airport referring to the time and date of the review hearing and explaining where copies of the additional papers can be found and obtained in hard copy.

I believe that the facts stated in this Witness Statement and Exhibits are true.

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

I am duly authorised to make this statement on behalf of the Claimants.



_____

Stuart Sherbrooke Wortley

6 June 2025

Claim no: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) LEEDS BRADFORD AIRPORT LTD

AND THREE OTHERS

Claimants

-and-

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

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the injunction made by Order dated 19 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 **("the Claims")**

AND UPON reading the application and the witness evidence in support

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Ritchie J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Ritchie J Order

2. Paragraph 2 of the Ritchie J Order is amended so as to read:

   "This Order is subject to periodic review by the Court on application by the First, Second and Third Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-2317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) LEEDS BRADFORD AIRPORT LTD

AND THREE OTHERS

Claimants

-and-

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

AND TWO OTHERS

Defendants

ORDER

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ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

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UPON the Claimants' claim by the claim form dated 16 July 2024

AND UPON the Claimants' application for an injunction dated 16 July 2024

AND UPON the injunction made by Order dated 5 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025 ("**the Application**")

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 ("**the Claims**")

AND UPON reading the application and the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Ritchie J Order

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the Ritchie J Order

DEFINITIONS

"**Leeds Bradford Airport**" means the land shown in red outlined in red on Plan 1 to the Claim Form appended to this Order in Schedule 1 ("**Plan 1**")

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

https://www.leedsbradfordairport.co.uk/injunction at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendants and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant (or any of them).

2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the First Defendants by:

    a. Uploading a copy onto the following website: https://www.leedsbradfordairport.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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the First Defendants and each of them.

6. The Court will provide sealed copies of this Order to the Claimants' solicitors for service or notification (whose details are set out below).

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the First Defendants of any further applications or documents in the proceedings by the First, Second and Third Claimants shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The First, Second and Third Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 1 will be the same as Plan 1 attached to the Ritchie J Order

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant will take steps to serve the First Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

(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 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

□□□

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Claim no: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

AND THREE OTHERS

Claimants

-and-

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

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UPON the injunction made by Order dated 19 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 **("the Claims")**

AND UPON reading the application and the witness evidence in support

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Ritchie J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Ritchie J Order

2. Paragraph 2 of the Ritchie J Order is amended so as to read:

   "This Order is subject to periodic review by the Court on application by the First, Second and Third Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-2317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(2) LONDON LUTON AIRPORT OPPERATIONS LIMITED

AND THREE OTHERS

Claimants

-and-

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT LIMITED SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

□□□

UPON the Claimants' claim by the claim form dated 16 July 2024

AND UPON the Claimants' application for an injunction dated 16 July 2024

AND UPON the injunction made by Order dated 5 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 **("the Claims")**

AND UPON reading the application and the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Ritchie J Order

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London Luton Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the Ritchie J Order

DEFINITIONS

"**London Luton Airport**" means the land shown in red outlined in red on Plan 2 to the Claim Form appended to this Order in Schedule 1 ("**Plan 2**")

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.london-

luton.co.uk/corporate/lla-publications/injunction at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendants and each of them are forbidden from entering, occupying or remaining on any part of London Luton Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant (or any of them).

2. This Order is subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the Second Defendants by:

    a. Uploading a copy onto the following website: https://www.london-luton.co.uk/corporate/lla-publications/injunction

    b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.

    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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Second Defendants and each of them.

6. The Court will provide sealed copies of this Order to the Claimants' solicitors for service or notification (whose details are set out below).

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the Second Defendants of any further applications or documents in the proceedings by the Second Claimant shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The Second Claimant shall have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 2 will be the same as Plan 2 attached to the Ritchie J Order

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND CLAIMANT

(1) The Second Claimant will take steps to serve the Second Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

(2) The Second Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

□□□

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Claim no: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

AND THREE OTHERS

Claimants

-and-

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the injunction made by Order dated 19 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (**"the Claims"**)

AND UPON reading the application and the witness evidence in support

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Ritchie J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Ritchie J Order

2. Paragraph 2 of the Ritchie J Order is amended so as to read:

   "This Order is subject to periodic review by the Court on application by the First, Second and Third Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-2317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

AND TWO OTHERS

Claimants

-and-

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT LIMITED SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

□□□

UPON the Claimants' claim by the claim form dated 16 July 2024

AND UPON the Claimants' application for an injunction dated 16 July 2024

AND UPON the injunction made by Order dated 5 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025 ("**the Application**")

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 ("**the Claims**")

AND UPON reading the application and the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Ritchie J Order

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Newcastle International Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the Ritchie J Order

DEFINITIONS

"**Newcastle International Airport**" means the land shown in red outlined in red on Plan 3 to the Claim Form appended to this Order in Schedule 1 ("**Plan 3**")

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

https://www.newcastleairport.com/about-your-airport/airport-company/injunction/ at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendants and each of them are forbidden from entering, occupying or remaining on any part of Newcastle International Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First, Second and Third Claimants (or any of them).

2. 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 and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the First Defendants by:

    a. Uploading a copy onto the following website: https://www.newcastleairport.com/about-your-airport/airport-company/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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Third Defendants and each of them.

6. The Court will provide sealed copies of this Order to the Claimants' solicitors for service or notification (whose details are set out below).

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the Third Defendants of any further applications or documents in the proceedings by the First, Second and Third Claimants shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The Third and Fourth Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

□□□

SCHEDULE 1

Plan 3 will be the same as Plan 3 attached to the Ritchie J Order

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE THIRD AND FOURTH CLAIMANTS

(1) The Third and Fourth Claimants will take steps to serve the Third Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

(2) The Third and Fourth Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Claim Form

In the	
Fee Account no.	
Help with Fees - Ref no. (if applicable)	**H W F** – –

You may be able to issue your claim online which may save time and money. Go to www.moneyclaim.gov.uk to find out more.

	For court use only
Claim no.	
Issue date	

Claimant(s) name(s) and address(es) including postcode

SEAL

LEEDS BRADFORD AIRPORT LIMITED
eeds LS19 7TU
LONDON LUTON AIRPORT OPERATIONS LIMITED
ercival House, 134 Percival Way, London Luton Airport, Luton LU2 9NU
NEWCASTLE INTERNATIONAL AIRPORT LIMITED
of Woolsington, Newcastle Upon Tyne, NE13 8BZ
(4) **NIAL SERVICES LIMITED**
of Unit 1,Prestwick Industrial Est., Ponteland, Newcastle Upon Tyne, NE20 9DA

Defendant(s) name and Address(es) including postcode

Please refer to Schedule 1 attached to the Claim Form

Brief details of claim

Value

Defendant's name and address for service including postcode

	£
Amount claimed	
Court fee	
Legal representative's costs	
Total amount	

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

© Crown Copyright 2022

Claim no.	

You must indicate your preferred County Court Hearing Centre for hearings here (see notes for guidance)

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

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

☐ No

Does, or will, your claim include any issues under the Human Rights Act 1998?

☐ Yes

☐ No

Claim no.	

Particulars of Claim

☐ attached

☐ to follow

Statement of truth

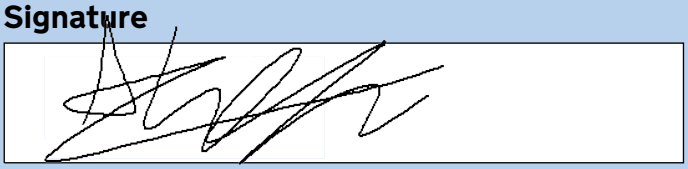
Note: you are reminded that a copy of this claim form must be served on all other parties.

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

☐ **I believe** that the facts stated in this claim form and any attached sheets are true.

☐ **The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

Signature



☐ Claimant

☐ Litigation friend (where claimant is a child or protected party)

☐ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day | Month | Year

Full name

Name of claimant's legal representative's firm

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

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

Second line of address

Town or city

County (optional)

Postcode

If applicable

Phone number

DX number

Your Ref.

Email

SCHEDULE 1 TO THE CLAIM FORM

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

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Amended pursuant to the order of the Honourable Mr Justice Ritchie dated 23 July 2024

CLAIM NO: KB – 2024 - 002317

IN THE HIGH COURT OF JUSTICE

KINGS BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

(4) NIAL SERVICES LIMITED

Claimants

-and-

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

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

AMENDED PARTICULARS OF CLAIM

PURSUANT TO THE ORDER OF THE HONOURABLE MR JUSTICE RITCHIE

DATED 23 JULY 2024

Leeds Bradford Airport

1. The First Claimant is the operator of Leeds Bradford Airport, located in Leeds, LS19 7TU, shown outlined in red on Plan 1 ("**LBA**"). LBA serves around 4 million travelling passengers each year with an annual revenue of approximately £43 million.

2. The First Claimant is the registered proprietor of the land on which LBA is situated as shown in red on Plan 1, through a mixture of freehold and leasehold interests as shown in the Title Schedule hereto — but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas and subject also to certain highways.

3. Subject to those interests, the First Claimant is entitled to an immediate right of possession occupation and control of LBA by virtue of its titles as shown in the Title Schedule.

4. Plan 1A identifies the areas within LBA over which the First Claimant lacks (or does not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests ("**the LBA Third Party Areas**") or public rights of way ("**the LBA Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First Claimant does not assert that it is the person with an immediate right of occupation or possession.

    a. The LBA Third Party Areas are indicated by blue and green shading. The blue shading indicates areas within LBA which are the subject of leases or other occupational arrangements. The green shading indicates parts of LBA which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

    b. The LBA Highways are indicated by pink and purple shading. The pink highways are located at ground level and provide access to LBA to the First Claimant and its licensees (including members of the public). The purple highway runs beneath the runway at the airport.

5. As indicated on Plan 1A, there is one area shaded in blue which directly abuts the red line on the southern boundary of LBA. At that location, the boundary of LBA is not in the possession or control of the First Claimant. Apart from that exception:

access to or from the LBA Third Party Areas by the public from outside the airport, involves the use of areas of LBA which remain unencumbered by any such arrangement and in relation to which, accordingly, the First Claimant remains entitled to possession occupation and control by virtue of their interests shown in the Title Schedule.

6. Plan 1B identifies the various interests held by the First Claimant in the land on which LBA is situated. At the south east, abutting the land shown hatched in pink registered under title WYK232726 at HM Land Registry, are landing lights ("**the LBA Landing Lights**"). Title to the land on which those lights are situate is registered in a third party's name. By an agreement dated 10 December 1982, a predecessor in title to the First Claimant was granted the right to erect and maintain landing lights in the relevant area of land. That agreement is unregistered.

7. By virtue of s63 of the Airports Act 1996, the First Claimant has power to make byelaws with respect to LBA. Pursuant to the Leeds Bradford Airport Byelaws 2022, byelaw 3.24, no person has a right to use any part of LBA as defined therein for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. The plan which defines LBA for the purposes of the byelaws does not extend in the south to the LBA Landing Lights. Apart from that, it includes all the land outlined in red on Plan 1A together with other land (shaded in yellow on Plan 1A). As at the date of commencement of this claim, the First Claimant seeks no relief in relation to the yellow land, notwithstanding that such land is within the byelaws, because the yellow land is not within the operational boundary of LBA. The First Claimant does not, however, repudiate the right to seek relief in relation to such areas, should events materialise which make that course appropriate.

London Luton Airport

8. The Second Claimant is the operator of London Luton Airport, located in Luton, LU2 9LY, shown outlined in red on Plan 2 ("**Luton Airport**"). Luton Airport serves around 16.4 million travelling passengers each year with an annual revenue of approximately £296 million.

9. The Second Claimant is the proprietor of the land on which Luton Airport is situated as shown in red on Plan 2, through the interests shown in the Title Schedule hereto—— but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

10. Subject to those interests of third parties, the Second Claimant is entitled to an immediate right of possession occupation and control of Luton Airport, by virtue of its titles as shown in the Title Schedule.

11. Plan 2A identifies the areas within Luton Airport over which the Second Claimant lacks (or does not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the Luton Third Party Areas**") or public rights of way ("**the Luton Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Second Claimant does not assert that it is the person with an immediate right of occupation or possession.

    a. The Luton Third Party Areas are indicated in black, blue and green. The black land is a Direct Air-Rail Transit ("DART") and DART station. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

    b. The Luton Highways are indicated in pink. These provide access to Luton Airport to the Second Claimant and its licensees (including members of the public).

12. As indicated on Plan 2A, certain of the Luton Third Party Areas abut the red line on the western boundary of Plan 2A. At those locations, the boundary is not in the possession or control of the Second Claimant. Subject to that: access to or from the Luton Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Luton Airport which remain unencumbered by any such arrangement and in relation to which, accordingly, the Second Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

13. Plan 2B identifies the various interests held by the Second Claimant in the land on which Luton Airport is situated. To the east of the land shown hatched green, are various landing lights some of which are situate on the land shown shaded in blue registered under title HD544934 at HM Land Registry (which the Second Claimant has a proprietary interest in). The remainder of the landing lights are shown in red but are not situate on the land shaded in blue ("**the Luton Landing Lights**"). Title

to the land on which the Luton Landing Lights are situate is registered in a third party's name. The Second Claimant does not assert paper title to the land on which the Luton Landing Lights are situated. However, the Second Claimant has exclusive possession of the land in question by virtue of the installation of the lights, without consent from any person, and which have been in that location for around 20 years.

14. By virtue of s63 of the Airports Act 1996, the Second Claimant has power to make byelaws with respect to Luton Airport. Pursuant to the London Luton Airport Byelaws 2005, byelaw 2.16, no person has a right to use any part of Luton Airport for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the Luton Landing Lights, the plan which defines Luton Airport for the purposes of the byelaws includes all the land outlined in red on Plan 2A.

Newcastle Airport

15. The Third Claimant is the operator of Newcastle International Airport, located in Woolsington, Newcastle upon Tyne, NE13 8BZ, shown outlined in red on Plan 3 ("**Newcastle Airport**"). Newcastle Airport serves around 5 million travelling passengers each year with an annual revenue of approximately £65 million.

16. The Third and Fourth Claimants are the proprietors of the land on which Newcastle Airport is situated as shown in red on Plan 3, through the interests shown in the Title Schedule hereto—but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

17. Subject to the aforesaid interests of third parties, the Third and Fourth Claimants are entitled to an immediate right of possession occupation and control of Newcastle Airport, by virtue of its titles as shown in the Title Schedule and the agreements dated 21 January 2005; 4 May 2023; 20 October 1999; and 31 August 2020.

18. Plan 3A identifies the areas within Newcastle Airport over which the Third and Fourth Claimants lack (or do not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the Newcastle Third Party Areas**") or public rights of way ("**the Newcastle Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Third and Fourth Claimants do not assert that they are the person with an immediate right of occupation or possession.

a. The Newcastle Third Party Areas are indicated in black, blue and green. The black land is a railway station. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

b. The Newcastle Highways are indicated in pink. These provide access to Newcastle Airport to the Third and Fourth Claimants and their licensees (including members of the public).

19. As indicated on Plan 3A, parts of the Newcastle Third Party Areas, being those areas shaded in blue which abut the red line at the north of Plan 3A and on the eastern and western boundary of Plan 3A. At those locations, the boundary is not in the possession or control of the Third and/or Fourth Claimants. Subject to that: access to or from the Newcastle Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Newcastle Airport which remain unencumbered by any such arrangement and in relation to which, accordingly, the Third and Fourth Claimant remain entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

20. Plan 3B identifies the Third and Fourth Claimants' various registered interests in the land on which Newcastle Airport is situated. On the western and eastern boundaries of the land registered under title number TY433695 at HM Land Registry, are landing lights ("**the Newcastle Landing Lights**"). Title to the land on which those lights are situate is registered in a third party's name. By agreements dated 21 January 2005; 4 May 2023; 20 October 1999; and 31 August 2020, the Third Claimant was granted rights to erect and maintain landing lights in the relevant areas of land. Such rights or interests thereby granted are unregistered.

21. By virtue of s63 of the Airports Act 1996, the Third Claimant has power to make byelaws with respect to Newcastle Airport. Pursuant to the Newcastle Airport Byelaws 2021, byelaw 4.12 and 4.18, no person has a right to use any part of Newcastle Airport for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the Newcastle Landing Lights, the plan which defines Newcastle Airport for the purposes of the byelaws includes all the land outlined in red on Plan 3A.

The Claimants' claims

22. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management/ airline facilities, and (save at LBA) a railway station.

23. In relation to each airport:

    a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).

    b. No wider consent subsists; and (subject to the highways described above) no public right of access, or way, subsists over the airports.

    c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.

    d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

24. In relation to the Third Party Areas at each airport:

    a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the Court to make an order which does not distinguish between the airports generally (as

shown outlined in red on the various plans) and the Third Party Areas within them;

b. Further or alternatively, protest which occurs on the Third Party Areas interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.

25. In relation to the landing lights:

a. For the LBA Landing Lights and/or the Newcastle Landing Lights, paragraph 23 above applies mutatis mutandis.

b. Alternatively and/or in respect of the LBA Landing Lights and/or the Luton Landing Lights and/or the Newcastle Landing Lights, paragraph 24a above applies mutatis mutandis and/or protest which occurs on the land on which the lights are situate interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the First and/or Second and/or Third Claimants' land, insofar as a need might arise to close off the runway for safety reasons in the event that the landing lights became compromised or threatened.

26. Further, in respect of the LBA Highways, the Luton Highways and the Newcastle Highways described above: protest which occurs on these highways interferes and/or threatens to interfere:

a. Unreasonably and substantially, with the Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;

b. Unreasonably and substantially, with (and/or to obstruct or hinder) the free passage along the highway, occasioning particular damage to the Claimants; and

c. Further, in respect of the tunnelled highway in pink on Plan 1A, unreasonably and substantially, with the First Claimant's ordinary use and enjoyment of LBA, insofar as a need might arise to close off the runway for safety reasons; and

d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the byelaws.



The threats

27. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:

28. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations…"

29. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").

30. At this meeting, a co-founder of Just Stop Oil was reported to have advocated:

    ● Cutting through fences and gluing themselves to runway tarmac;

    ● Cycling in circles on runways;

    ● Climbing on to planes to prevent them from taking off;

    ● Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.

31. Since that meeting, Just Stop Oil has announced the following on its website:

> "***SO WHAT'S THE PLAN?***
> *Our Government doesn't give a f*** about its responsibilities. The country is in ruins. You know it, I know, they know it. That means it's up to us to come together and be the change we need.*
>
> *We need bold, un-ignorable action that confronts the fossil fuel elites. We refuse to comply with a system which is killing millions around the world, and that's why we have declared airports a site of nonviolent civil resistance."*
>
> *We can't do this alone, we have a plan for this Summer, are you willing help make this happen?"*

32. It says, further:

*"**This summer, Just Stop Oil will be taking action at airports.***

As the grass becomes scorched, hosepipe bans kick in and the heat of the climate crisis enters peoples' minds, our resistance will put the spotlight on the heaviest users of fossil fuels and call everyone into action with us.

We'll work in teams of between 10-14 people willing to risk arrest from all over the UK. We need to be a minimum of 200 people to make this happen, but we'll be prepared to scale in size as our numbers increase. Exact dates and more details are coming.

Our plan can send shockwaves around the world and finish oil and gas. But we need each other to make it happen. Are you ready to join the team?"

33. Just Stop Oil has also organised a fundraising page on the website https://chuffed.org/project/just-stop-oil-resisting-against-new-oil-and-gas, which says the following:[1]

*"**Cat's out the bag. Just Stop Oil will take action at airports***

The secret is out — and our new actions are going to be big.
*We're going so big that we can't even tell you the full plan, but know this — Just Stop Oil will be taking our most radical action yet this summer. We'll be taking action at sites of key importance to the fossil fuel industry; **super-polluting airports**.*

…"

34. On 6 June 2024, an email was sent from info@juststopoil.org to a subscriber list stating:

"This is the most exciting email I've ever sent.

As many of you already know, this summer Just Stop Oil is taking action at airports.

That's exciting right? Well, there's more.

We won't be taking action alone.

Resistance groups across several countries in Europe have agreed to work together. That means this summer's actions will be internationally coordinated.

PICTURE OF AIRPORT ACTIONS SYMBOLISING INTERNATIONAL COMMUNITY (https://us02web.zoom.us/meeting/register/tZIoduqpqTMtE9dgMMhlaymvEZgO45jgJ19A)

People across Europe will be taking the fight to airports, the heart of the fossil economy.

This summer's actions across multiple countries will go down in history.

[1] As of 11 July 2024, £24,275 had been raised on this website.

Want to meet the people making this happen?

Every Thursday for the next four weeks starting on the 13th of JUNE, 6.30pm

You don't want to miss this.

See you there,

Just Stop Oil"

35. On 2 June 2024, Extinction Rebellion environmental activists blocked access to Farnborough Airport.

36. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at London Stansted Airport (in an area which is subject to an occupational arrangement with a third party), as part of a series of protests on climate change. This included:

    a. an individual using an angle grinder to cut a hole in the perimeter fence of the airport;

    b. two individuals trespassing the perimeter fence; and

    c. spray painting two aircrafts orange using a fire extinguisher.

37. As a result of this direct action:

    a. It was necessary to suspend operations on the runway at Stansted Airport for approximately 50 minutes: three aircraft departures were affected.

    b. the two individuals (known as Jenifer Kowalski and Cole Macdonald) were arrested and charged with causing criminal damage, aggravated trespass and interference with the use or operation of national infrastructure.

38. Further, in respect of LBA and Luton Airport:

    a. in the period between 2019 and 2022, Extinction Rebellion repeatedly carried out protests about the planned expansion of LBA, including on highways and/or accessways to LBA. In September 2023, the First Claimant commenced construction works at LBA in order to expand the airport.

    b. in the period between 2020 and 30 May 2024, various environmental protest groups carried out protests against the expansion of Luton Airport.

39. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for LBA, Luton Airport and/or Newcastle Airport

    a. trespass on the airports and/or

    b. by protest conducted on or from the Third Party Areas and/or on or from the land on which the LBA Landing Lights, Luton Landing Lights and/or Newcastle Landing Lights are situate, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or

    c. by protest conducted on or from the highways, obstruct those occasioning particular damage to the Claimants and/or interfere with the Claimants' right of access to the airports via those highways, so as to cause a nuisance actionable by the Claimants.

40. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.

41. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:

42. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.

43. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive — by which point harm may already have occurred.

44. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.

45. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.

46. The airports in the present case are all the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the Claimants are fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the Byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at Stansted Airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.

47. Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.

48. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND THE FIRST CLAIMANT CLAIMS AGAINST THE FIRST DEFENDANT:

(1) Subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months or such other period as the Court may determine, an order that the First Defendants must not, without the consent of the First Claimant enter, occupy or remain upon the land outlined in red on Plan 1.

AND THE SECOND CLAIMANT CLAIMS AS AGAINST THE SECOND DEFENDANT:

(2) Subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent of the Second Claimant, enter, occupy or remain upon the land outlined in red on Plan 2.

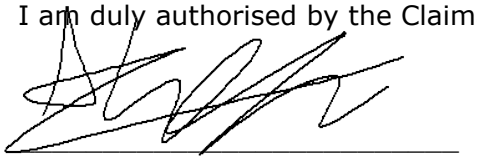
AND THE THIRD AND FOURTH CLAIMANTS CLAIM AGAINST THE THIRD DEFENDANT:

(3) Subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Third Defendants must not, without the consent of the Third and Fourth Claimants (or either of them), enter, occupy or remain upon the land outlined in red on Plan 3.

STATEMENT OF TRUTH

The Claimants believe that the facts stated in these Amended particulars of claim are true. The Claimants understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by the Claimants to sign this statement.



Alexander James Wright

Principal Associate

Eversheds Sutherland (International) LLP

Claimants' solicitor

Dated: ~~16~~ 23 July 2024

TITLE SCHEDULE TO THE PARTICULARS OF CLAIM

1. The First Claimant is the registered proprietor of the following titles:-

Title number	Freehold / Leasehold
WYK232726	Freehold
WYK269721	Freehold
WYK275282	Freehold
WYK461796	Freehold
WYK500833	Freehold
WYK500834	Freehold
WYK512407	Freehold
WYK547070	Freehold
WYK547071	Freehold
WYK570873	Freehold
WYK574741	Freehold
WYK624715	Freehold
WYK657177	Freehold
WYK657180	Freehold
WYK698270	Freehold
WYK698436	Freehold
WYK706576	Freehold
WYK775942	Freehold
WYK723309	Freehold
WYK806314	Freehold
WYK831477	Freehold
WYK857105	Freehold
WYK857106	Freehold
WYK395678	Freehold
WYK657178	Leasehold
WYK501284	Leasehold

2. The Second Claimant is the registered proprietor of the following titles:-

Title number	Freehold / Leasehold
BD235078	Leasehold
BD206048	Leasehold
BD339131	Leasehold
BD332840	Leasehold
BD216008	Leasehold
HD544934	Leasehold

3. The Third Claimant is the registered proprietor of the following titles:-

Title number	Freehold / Leasehold
TY349352	Freehold
TY476495	Freehold
TY433695	Freehold

5. The Fourth Claimant is the registered proprietor of the following title:-

Title number	Freehold / Leasehold
ND75730	Freehold

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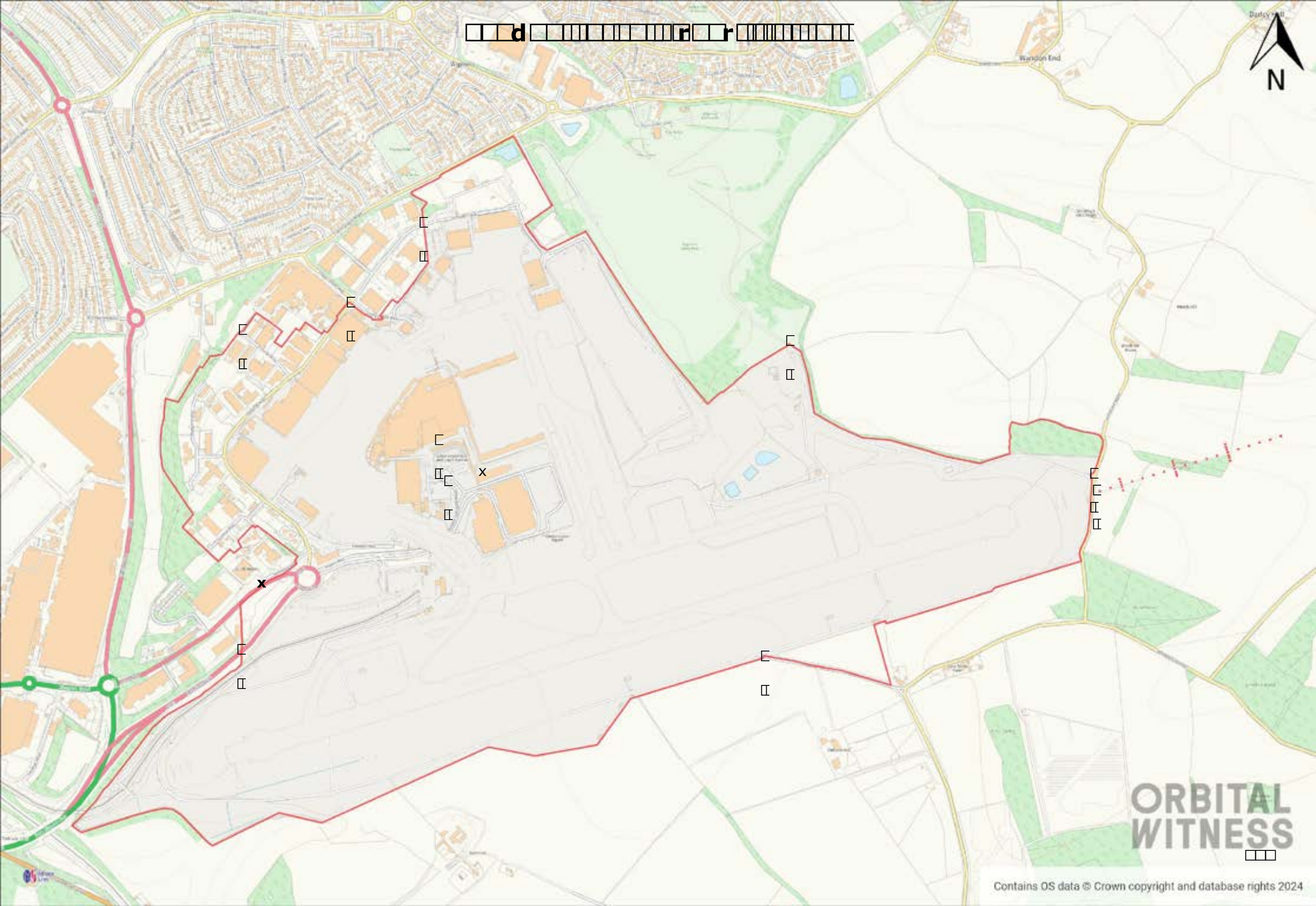
Yeadon

Map scale **1:10,000**

Assumes printed map area measures 395mm by 272mm.

ORBITAL WITNESS

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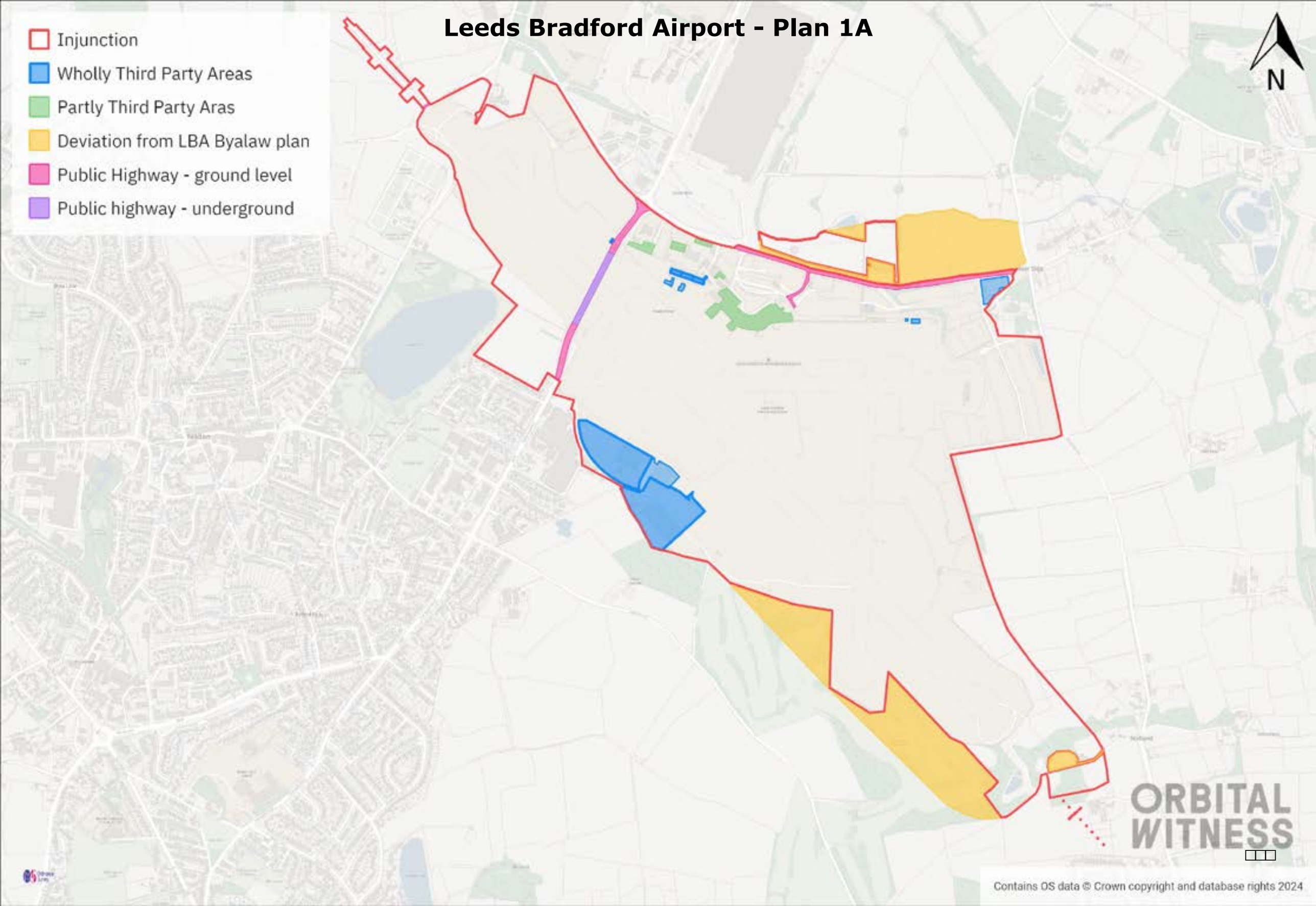
Newcastle International Airport

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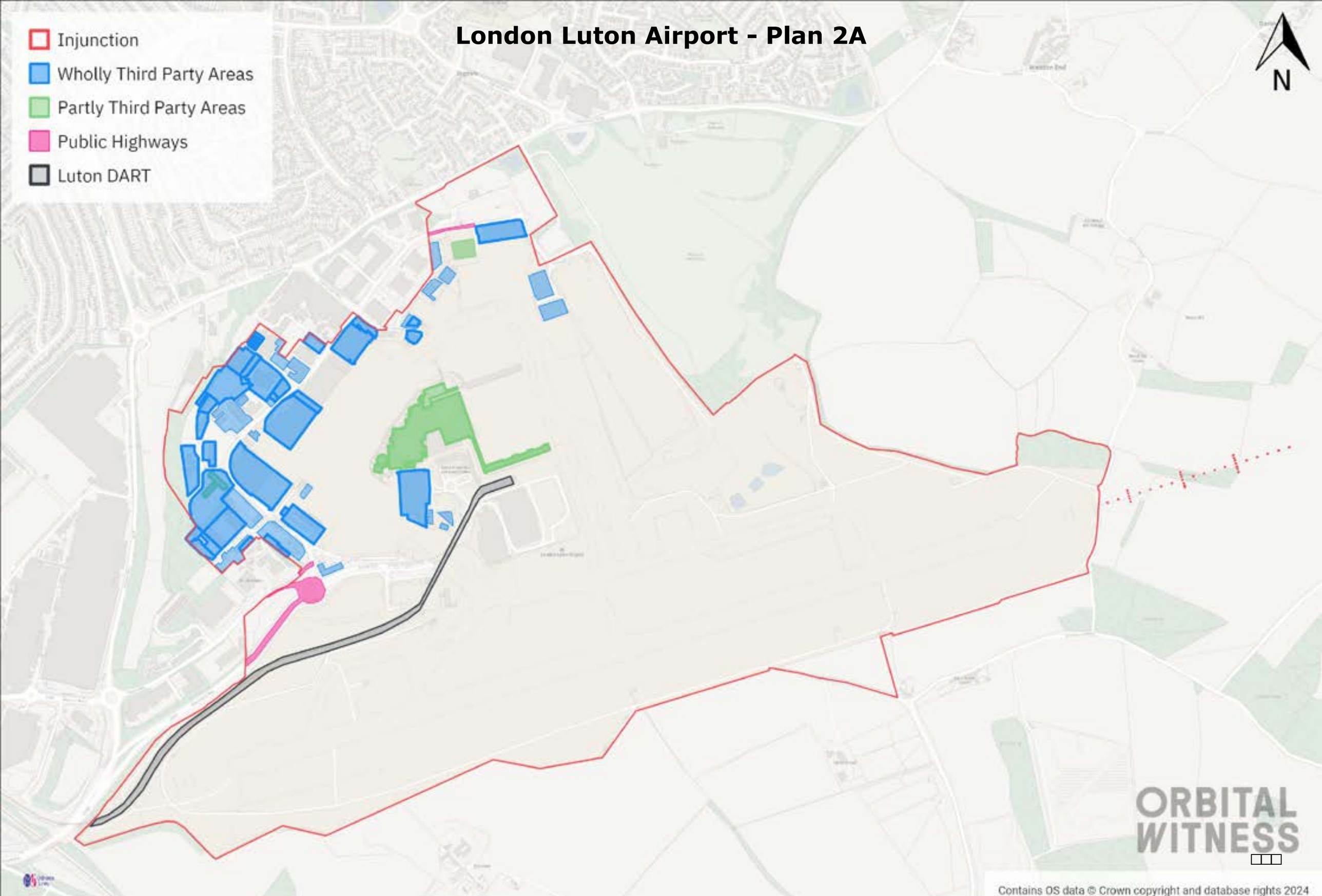
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Leeds Bradford Airport - Plan 1A



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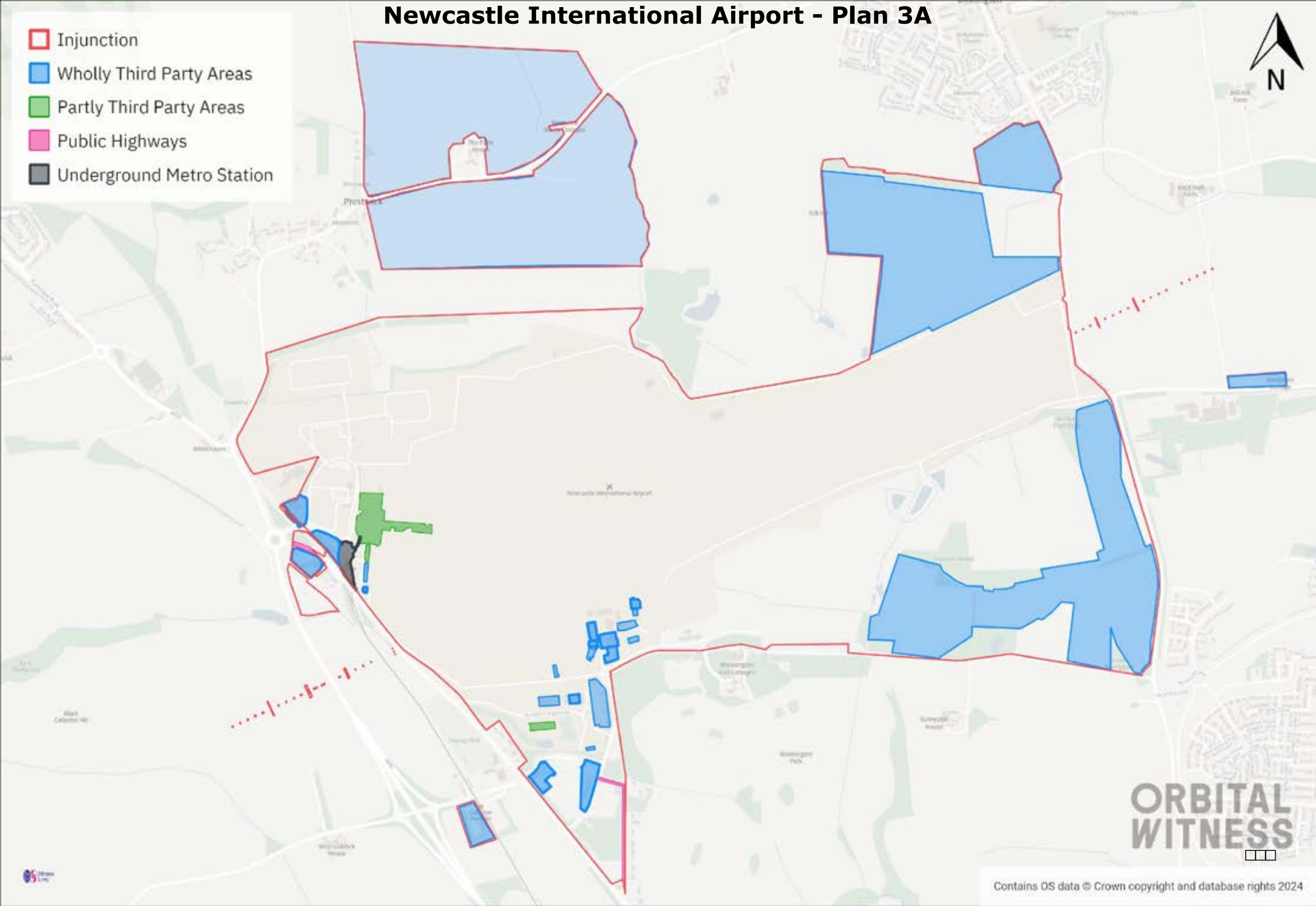
London Luton Airport - Plan 2A



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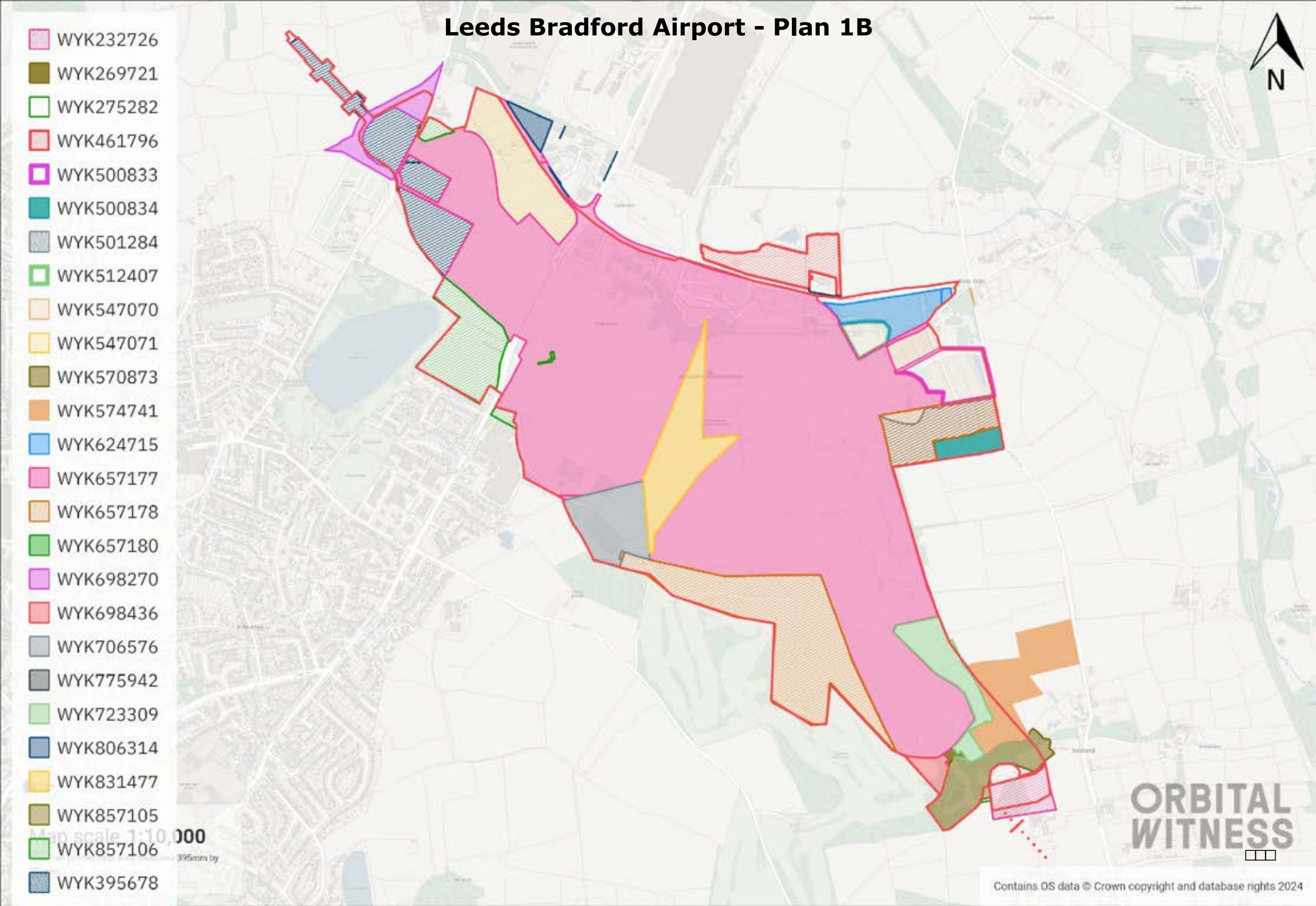
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Newcastle International Airport - Plan 3A



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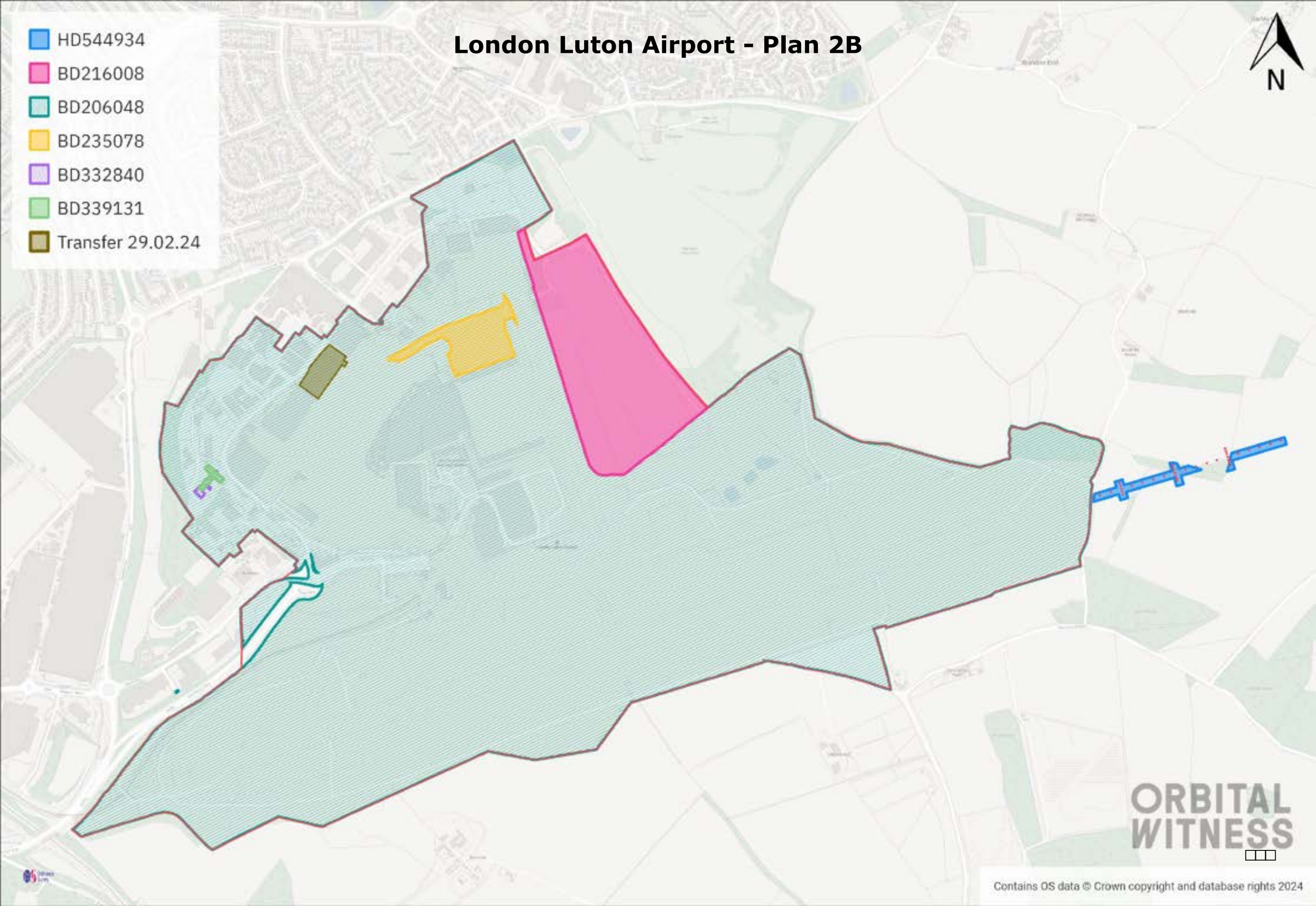
Leeds Bradford Airport - Plan 1B



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London Luton Airport - Plan 2B



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Newcastle International Airport - Plan 3B



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Schedule 1 ~~3~~ Plan Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-



(1) LEEDS BRADFORD AIRPORT LIMITED

AND THREE OTHERS

Claimants

- v -

KB-2024-002317

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

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex-parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the first witness statements: of Alexander James Wright dated 16 July 2024, 17 July 2024, (another) 17 July 2024; and 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden, Counsel for the Claimants and no one attending for the Defendants.

AND UPON the First Claimant giving and the Court accepting the undertakings set out in Schedule 2 to this Order.

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to protestrequest@lba.co.uk.

DEFINITIONS

"**Leeds Bradford Airport**" means the land shown in red outlined in red on Plan 1 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

https://www.leedsbradfordairport.co.uk/injunction. at which copies of this Order may be viewed and downloaded).

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the First Defendant:

    a. Uploading a copy onto the following website: https://www.leedsbradfordairport.co.uk/injunction.

    b. Sending an email to each of the email addresses listed in Schedule 3 to this Order (1) stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and (2) attaching this Order.

    c. Affixing a notice at those locations marked with an "X" on Plan 1 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form of Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraph 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.

6. The Court will provide sealed copies of this Order to the First Claimant's solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3 and 4. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the First Defendant of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the First Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.

13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

14. No acknowledgment of service, admission or defence is required by any party until further so ordered.

15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE FIRST CLAIMANT

The First Claimant's solicitors and their contact details are:

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

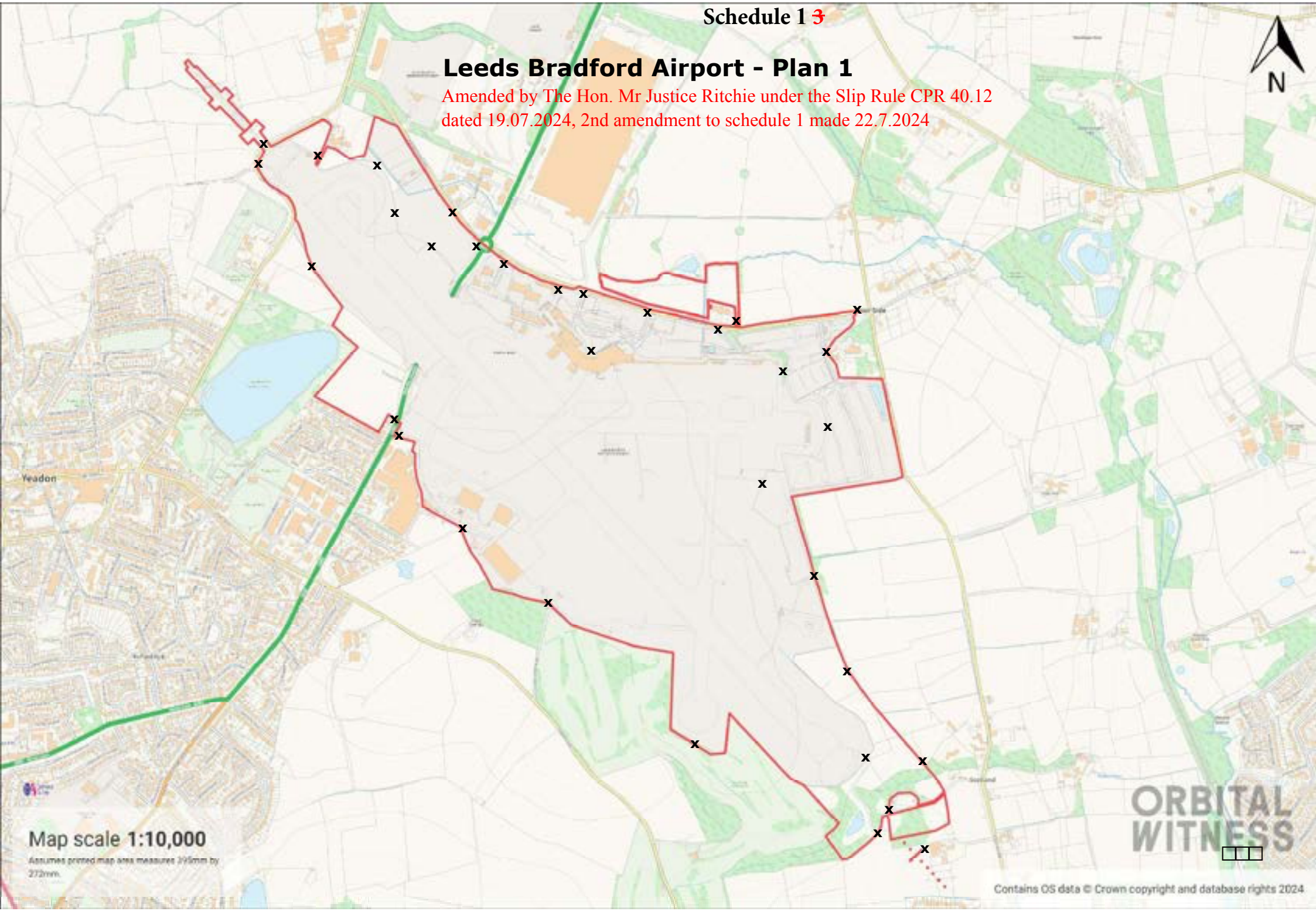
(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

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

Schedule 1 ~~3~~

Leeds Bradford Airport - Plan 1

Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12
dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant will take steps to serve the First Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

(2) The First Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Leeds Bradford Airport Limited (the "**First Claimant**")

This notice relates to the land known as Leeds Bradford Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

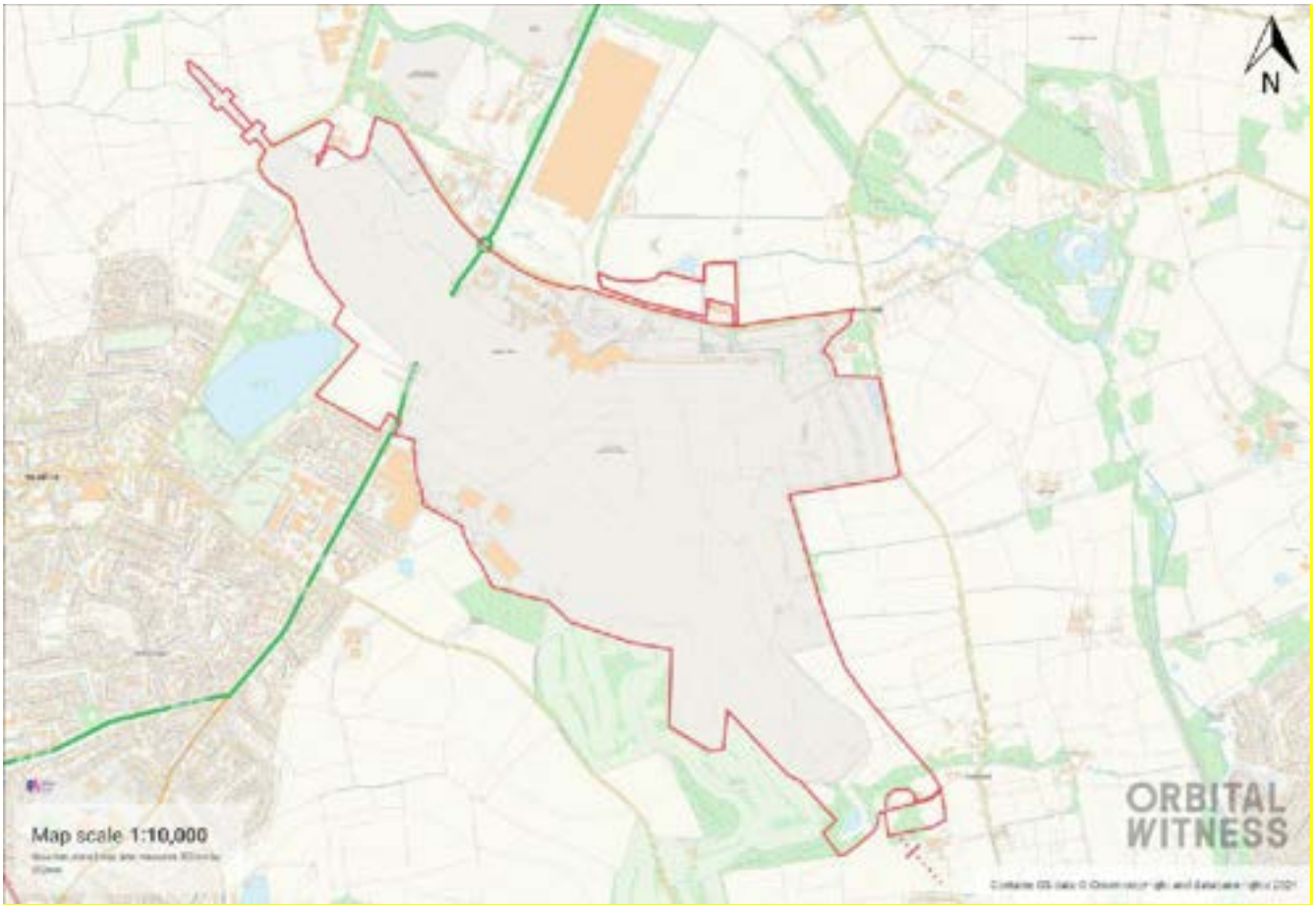
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: https://www.leedsbradfordairport.co.uk/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.


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Map scale 1:10,000
ORBITAL
WITNESS

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE



BETWEEN:-

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

- v -

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

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(3) **PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)**

□□□

Defendants

ORDER

BEFORE: THE HONOURABLE MR JUSTICE RITCHIE sitting at the Royal Courts of Justice on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024.

AND UPON the Claimants' application for an injunction dated 16 July 2024 ("**the Application**").

AND UPON READING the Application and the first witness statement of Alexander James Wright dated 16 July 2024, the second witness statement of Alexander James Wright dated 17 July 2024, the third witness statement of Alexander James Wright dated 17 July 2024 and the fourth witness statement of Alexander James Wright dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("the Witness Statements")

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants

AND UPON the Court granting the First Claimant an injunction on 18 July 2024 ("**the Leeds Bradford Order**") in respect of the land shown outlined in red on Plan 1 to the Claim Form ("**Leeds Bradford Airport**")

AND UPON the Court granting the Second Claimant an injunction on 18 July 2024 ("**the Luton Order**") in respect of the land shown outlined in red on Plan 2 to the Claim Form ("**Luton Airport**")

AND UPON the Court granting the Third and Fourth Claimants an injunction on 18 July 2024 ("**the Newcastle Order**") in respect of the land shown outlined in red on Plan 3 to the Claim Form ("**Newcastle Airport**")

NOW IT IS ORDERED THAT:

PERMISSION TO AMEND

1. The Claimants have permission to amend the Claim Form and Particulars of Claim relating to:

   a. The description of the Defendants;

   b. The plans attached to the claim form so as to use labelled “Plan 1”, “Plan 2” and “Plan 3”.

   c. Annexing the revised plans referred to in the particulars of claim.

   d. If so advised, by 4pm on 1 August 2024 to plead any claims against Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow.

   Ritchie J

   Made: 23.7.2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

(4) NIAL SERVICES LIMITED

Claimants

-and-

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

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

NOTE OF "WITHOUT NOTICE" HEARING BEFORE

MR JUSTICE RITCHIE

18 JULY 2024

□□□

Hearing 18.07.24

The Hearing commenced at 10.30am.

The Judge had read the evidence (except for Alex Wright w/s #2, which he took a moment to read at the start of the hearing) and the Claimant's skeleton argument, and had received the authorities bundle.

TMKC introduced the case as one under the newly described jurisdiction which has been in the Supreme Court in Wolverhampton – sui generis relief against Persons Unknown; no defendants of which Cs were aware and no steps taken to notify.

Mr Justice Ritchie was familiar with the jurisdiction having granted injunctions in favour of HS2 and Esso.

This is an emerging area of law and the principles expressed in caselaw are still in the nature of guidance and the courts are encouraged by the Supreme Court to make decisions as they unfold. The guiding principle that attracts the eye of equity is the "compelling need" which stimulates the court to intervene. The developments of the law and breaking down of headings is what is needed when compelling need is identified, and to satisfy the human rights aspect.

Preliminary Matters

TMKC explained that, because of *Wolverhampton,* this was not a without notice application in the ordinary sense, but the Cs had complied with it on a precautionary basis for the reasons set out in AW w/s #1 (HB/272-273).
TMKC addressed that the Claim Form + the Particulars of Claim needed to be amended but noted as there is no issue as to service this permission may not be required, nonetheless he sought permission to amend:-

1. the Claim Form (plans attached were not labelled); and
2. the Particulars of Claim (plans were attached to AW w/s but not POC despite being referred to)

Permission granted.

Witness Statements / Evidence

The Judge noted that para 7 of AW w/s #2 related to protests at Gatwick (no injunction in place) on 24 June 2024.

The Judge noted the arrests that had been made and referred to in AW w/s, but was critical that there was no copy of Mr McBride's witness statement, obtaining it online was not practicable. The Judge noted that it was hearsay evidence.

TWKC provided AW w/s #4 to the Judge (updated Plan 3A).

Issues

Judge's primary concerns:-

1- Why have the defendants not been named or notice provided to the individuals, they being the ones alleged in the evidence as the guiding light / drum beaters. If they are known to be part of the persuaders then why aren't they defendants?;

2- General queries concerning clarity of the areas covered by the injunction, highways and third party land etc.; and

3- *Definition of Persons Unknown ("PU") - currently the definition of PU would cover protesting about delayed luggage (for example) – the Judge considered that would be too wide and needs to be more focused.*

Titles

TMKC explained Plan 1 and Plan 1B.

To clarify the Judge's query on C's rights to claim an injunction over a national highway (included within the red line on Plan 1), TMKC explained it would be to restrain nuisance affecting the customers and operations of the airport; the byelaws themselves cover disruptive nuisance over the highway.

TMKC clarified Cs are not asking the court to grant an injunction in aid of the byelaws, and provided examples of terminal cases with injunctions granted over highways.

The Judge considered an example of individuals sitting in the tunnel and stated that it's got nothing to do with trespass. It is a nuisance to interfere with anyone's right with the use of the highway. The nuisance would be that it obstructs the passageway of staff and licences. It could also be framed within the economic torts.

TMKC discussed the runway lights; these are affected by complex tapestry of titles, however, the structures of the lights are owned by the Cs. The Judge considered that the ownership of the land did not matter because Cs owned the lights and there could be a danger if the lights were covered and the planes could not land because they could not see.

TMKC explained Plans 1A – 3A and 1B – 3B; the third party areas should not be carved out and to recognise that anyone protesting in these areas is doing so in the airport and it is not appropriate to try to draw that distinction. There is also potential for protestors to be misled / create confusion.

Airports' Distinctiveness

TMKC explained that airports are not like normal places. Even peaceful protests are problematic and could be used as a mask for more serious things. There is potential for a peaceful protest to become not peaceful and/or to be misinterpreted by security staff. Airports are key national infrastructure. Security is the single most important item on the agenda.

TMKC drew the Judge's attention to VJH w/s on responsibilities of operators (on safety); safety is an issue of huge importance and there is sufficient chain of evidence for the court to accept the submission.

TMKC discussed that the central element of this equitable jurisdiction is that anyone can come and say "no this is too wide" and at that point, there can be arguments about it. At this stage, it is appropriate to proceed on a precautionary basis which is intrinsic to this jurisdiction, at least when there is evidence that it goes beyond mere assertion.

TMKC explains that third party occupiers have been notified and no objections received to the claim.

Plans

<u>Leeds Bradford Airport</u>

TMKC explained Plan 1A and why internal layout plans of the green buildings have not been provided (complexity).

London Luton Airport

TMKC explained Plan 2B, Plan 2A (including the highways) and Plans 2C – 2I.

TMKC explained the railway which is within C2's titles / ownership.

Newcastle

TMKC explained Plan 3, Plan 3B, Plan 3A (as substituted by AW w/s #4) and Plans 3C-3D.

TMKC there has been no uniform practice developed in these cases about whether notice should be given to third parties (e.g. the difference in approach in claims by the MAG group airports with Heathrow).

Threat and the compelling need

TMKC provided summary of incidents AW w/s #1 - the environmental campaign in recent years and also referred to para 52 of AW w/2 #1 (HB/264) - Tweet by Just Stop Oil ("JSO").

Helps to explain why these injunctions are effective. They recognise that injunctions are special, still that much respect for the law.

The Judge queried whether arrested JSO members should be a named individual; TMKC explained that they are no longer considered to be a threat given that they had received sanctions.

TMKC explained that apart from the obligation to identify the name, notification should also be as effective as possible.

Judge was uncertain as to why individuals were not named as defendants where they could be as "troop leaders"; those that can be named, should be named but they should be notified at least, whether they are named is a matter for Cs.

TMKC refers to AW w/s #3 and the JSO letter to the prime minister and the explicitness of their recent statement on *taking action at airports* (HB/591).

Specific to the Airports (LBA/LTN/NCL)

Generic features which make airports vulnerable to peaceful protest which the attempted protest at Gatwick airport with the bandages evidences. The cascade effect of from one cancellation / delay also makes them particularly vulnerable and that they are dangerous places.

At these airports, the lack of airbridges create a special acute level of risk of protestors breaking away because passengers have to cross the apron to get to aircraft and runways are closer to terminals - when the passengers are out in the open, there are additional security risks.

Cs have tried to accommodate protest, there were cornered off protest areas for safe and peaceful protest; Judge proposed a recital in the Order for a contact for peaceful protests.

All the airports are also protected by byelaws which prohibit disruptive protest.

Draft Order

The Judge considered the definition of PU to be too wide "persons unknown whose purpose is or includes protest". The POC centre on protests that focus on fossil fuels. Appropriate wording is required that focuses on the actual substance of the complaint.

Cs have a continuing duty of full and frank disclosure (therefore it would provide to the Court all relevant information if it had to enforce the relief).

Cuadrilla – paras 60, 65 and 69 (AB/376) - no objection to framing an order which involves a subjective element. If there is a problem, C would have a duty to satisfy the evidential burden.

TMKC addressed other questions by the Judge:

1- Why have we not named individual – covered

The Judge granted permission to amend stating it will be "as you see fit".

2- Areas covered which were highway and third party land

TMKC submits that in relation to all third party areas it is necessary to make the injunction effective, the supporting reason that protest activity on third party land and/or highways would be a nuisance, a direct tort. There is the issue of silent protest on third party land which would not be a nuisance, but that is caught by the first, we can't have situations where security need to monitor peaceful protest, not in an airport – elsewhere maybe.

3. definition of PU being too wide

TMKC did not develop further on this.

The Judge suggested adding a note to the order.

TMKC stated that the balancing exercise remains and sought that the Judge evaluates the submissions in light of the skeleton argument.

Judgement

This is an *ex parte* application issued on 16.07.2024 for injunctions against PU to exclude them from 3 airports and for alternative service provisions, extempore judgement fit within that period.

This Judgment is focused on LBA but will apply to LTN and NCL.

The POC identified third party areas over which Cs lacked possession (Plans 1A, 2A and 3A).

Cs set out that:-

- the public had implied consent to enter the airports;
- without any right to protest or such activities as had ben threatened by JSO;
- any person entering or staying on for protests would be a trespasser.

Third party areas were identified to which Cs are not entitled to possession but it was pleaded that Cs are entitled to protect their interest.

Protests on third party areas / highways would constitute a breach of the airports byelaws and in submission of this, suggested it would constitute a nuisance.

The Judge identified the various threats of protests as noted in the witness evidence (including at LTN); where the byelaws and breach thereof had no or little off putting effect.

Judge summarised the evidence in AW, VJH, AM and NJ w/ss.

The claimants sought injunctions to be reviewed every 12 months,

The cause of action: trespass, public/private nuisance. There is no claim for an economic tort or conspiracy. It is based on *quia timet* as there is no threat of direct action, but there is imminent threat.

Secondly, having looked at the disclosure that was provided in the professional bundle provided by Eversheds I consider that full and frank disclosure has been provided

Sufficient evidence: the evidence of ownership is sufficient and that the historic evidence is sufficient for proof of a risk of trespass and of public/private nuisance at the airport or the roads.

A realistic defence: That is on the basis of if it is a defence to protesters entering these airports with the intention to disrupt or breach the byelaws, the range of protests that has been used by environmental groups in the past has been very wide, including locking on, damaging structures, spraying paint, sit-ins/glue-ins, and many others. For such activities I do not foresee any realistic defence. I take into account of course that any injunction will be against unlawful activities or in breach of the byelaws.

Balance of convenience / compelling justification: is there a compelling reason to grant the injunction - the most relevant event is the threat made to the new Prime Minister of the UK which is comparable to previous threats made, these threats have a history of not being made lightly and such threats being seen through, including trespass, public and private nuisance. The other public and direct activity which has created torts and perhaps crimes, was Stansted and Farnborough, the threat to other airports may have been undermined by substantial arrests including the one relating to the Gatwick bandages arrest.

Airports are part of the national infrastructure which are actually sensitive to threat, they are frighteningly complicated organisations involving the movement of thousands of members of the public near the movement of huge and highly combustible equipment. They are particularly sensitive to direct action/unlawful protest.

Fear of CEOs is that terrorism is facilitated by chaos. Human rights of passengers who businesses or holidays may be catastrophically interrupted or cancelled. Although not pleaded, it is worth taking on the knock on effect on employment, however, I don't have those in the front of my mind because there is no pleading in for economic torts.

JSO and XR have made good on their threats in the past in a way that has caused enormous tax payer and private financial expense and disruptions at oil terminals, roads, sporting events and as threatened, potentially at airports. I also take into account that the evidence before me shows that previous High Court decisions have been effective in preventing unlawful activity. Also take into account the protesters lawful right to express their views, lawful protesting set out in Mr Hodder's statement is the right of every English person and is not to be restricted.

There is compelling justification to prevent fossil fuel protesters from entering or staying at these three airports and from protesting there and from any direction which could cause chaos / danger or constitute the torts set out in the particulars of claim.

Would damages be an adequate remedy: Obviously not: (1) PU by definition are unknown; and (2) I do not know of any case in which a PU has stumped up for any chaos they have caused.

I do not think they would go anywhere near to compensate the chaos that could be caused at an airport, for instance, on the tarmac. Therefore, damages are not an adequate remedy. It is better to prevent the chaos than compensate / fail to compensate.

Identifying PUs: Needs to include "fossil fuels". It is a duty of this court, to make absolutely clear the boundaries of the definition of PUs and I consider there is a potential

lack of clarity in defining them as protestors. There may be lawful protests that would otherwise be caught by the current too wide definition.

Scope of the injunction: I do not consider that there is a compelling justification for the injunction to cover flights going in and out of the airport.

Injunction: I consider that this is sufficient but I would add "for the purpose of fossil fuel", and consent of Cs.

The geographic boundaries: In relation to areas within the possession of the claimant and private jet areas, in view of what happened on Stansted, it is necessary that the injunction covers those private operations which are at least within the freehold ownership.

Finally, landing lights – I consider that the injunction should cover the landing lights as they are equipment owned by the Cs and if Ds disrupt it would be extremely chaotic and dangerous.

Temporal limits: review annual is sufficient, safe and fair way to protect rights of PU.

Service: methods of alternative service, agreed as per draft Order and provided to Reuters.

Right to vary or set aside: right should also be granted specifically to Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow, those 3 persons should be served directly by alternative service (website/email address).

Tidy up matters: whilst Public Order Act 2023 and Byelaws have changed the landscape somewhat in this application, they do not undermine the need for a proactive approach toward what would be catastrophic tortious damage.

Permission to amend CF and POC.

Certificate of service

Name of court	Claim No.
IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION	KB-2024-002317
Name of Claimant Leeds Bradford Airport Limited and others	
Name of Defendant Persons Unknown (as more particularly described in the Claim Form)	

On what day did you serve? 26/07/2024

The date of service is 26/07/2024

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Three Injunction Orders dated 19.07.2024 and further Order dated 23.07.2024, Amended Claim Form, Amended Particulars of Claim, Hearing Bundle, Witness Evidence in support of the Application Notice (including exhibits), Claimant's Skeleton Argument, Note of Hearing

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Persons Unknown

How did you serve the documents?
(please tick the appropriate box)

- ☐ by first class post or other service which provides for delivery on the next business day
- ☐ by delivering to or leaving at a permitted place
- ☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*
- ☒ by other means permitted by the court *(please specify)*

  pursuant to paragraphs 3-8 of the Orders dated 19.07.2024, the last step for service was completed on 26.07.2024
- ☐ by Document Exchange
- ☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*
- ☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

(1) Web: https://www.leedsbradfordairport.co.uk/injunction; https://www.london-luton.co.uk/corporate-site/lla-publications/injunction; https://www.newcastleairport.com/about-your-airport/airport-company/injunction
(2) Emails: juststopoil@protonmail.com; juststopoilpress@protonmail.com; info@juststopoil.org; and enquiries@extinctionrebellion.uk
(3) Site: Leeds Bradford Airport, Leeds, LS19 7TU; London Luton Airport, Airport Way, London, LU2 9LY; Newcastle International Airport, Woolsington, Newcastle, NE13 8BZ

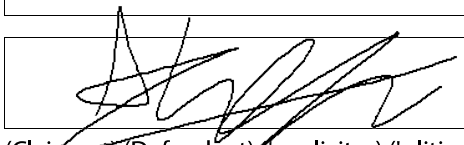
Being the ☐ claimant's ☐ defendant's ☐ solicitor's ☐ litigation friend

- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
- ☐ last known place of business
- ☐ last known principal place of business
- ☐ principal office of the partnership
- ☐ principal office of the corporation
- ☐ principal office of the company
- ☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- ☒ other *(please specify)*

  (1) C1-4's webpages; (2) D's email addresses; and (3) C1-4's Premises

I believe that the facts stated in this certificate are true.

Full name: Alexander Wright

Signed: 

(Claimant) (Defendant) ('s solicitor) ('s litigation friend)

Position or office held: Principal Associate

(If signing on behalf of firm or company)

Date: 12/08/2024

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Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim
A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	**Deemed day of service**
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

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

SECOND WITNESS STATEMENT OF

ALEXANDER JAMES WRIGHT

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)."

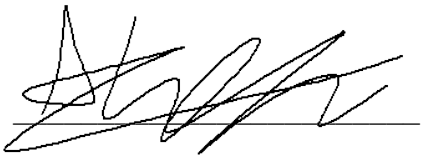
A copy of Mr McBride's witness statement is available online at https://assets.live.dxp.maginfrastructure.com/f/73114/x/270ba6fa6d/injunction-mag-hearing-bundle.pdf.

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.



Alexander James Wright

17 July 2024

Party: Claimants
Name: Alexander James Wright
Number: Third
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)

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Defendants

THIRD WITNESS STATEMENT OF

ALEXANDER JAMES WRIGHT

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 and my second witness statement of 17 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.

5. I refer to exhibits marked **"AW1"** in this statement. They have been produced to me and I verify that the documents in those exhibits are true copies of the documents.

FURTHER DEVELOPMENTS

6. On 17 July 2024, I was informed by a colleague that Just Stop Oil had published on their website a letter which they had written to Keir Starmer, the prime minister of the United Kingdom. The letter stated:

> "Dear Prime Minister,
>
> We write to congratulate you on becoming Prime Minister and to acknowledge that one of the first steps of your new government has been to reaffirm your commitment to end new UK oil and gas licensing. This is an essential first step towards what is required to end the UK's contribution to the climate crisis. However, we all know that it is not enough.
>
> We also need to rapidly phase out our existing oil and gas projects and to end the use of fossil fuels across our economy. This is not only the view of Just Stop Oil; the call for a rapid phase out of fossil fuels is backed by climate science, by global equity considerations, by international law and by global public opinion.
>
> We last wrote to you in your role as leader of the Labour Party on 24 June to demand that, should you become our next Prime Minister, you immediately commit the UK government to **working with other nations to establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fair and just transition**.

> We indicated that unless such assurances were provided by 12 July, we would be forced to take action to protect our communities by engaging in a campaign of noncooperation against fossil fuel use, at airports across the country.
>
> We are writing now to let you know that since no such assurances have been received we remain in civil resistance and are preparing to take action, but that, as ever, we remain open to dialogue.
>
> The era of fossil fuels is over. It's time to stop waging war on humanity.
>
> Yours sincerely,
>
> Just Stop Oil. (emphasis added by underlining)"

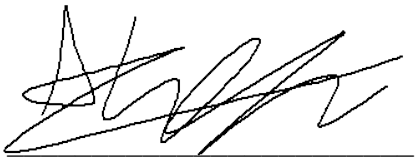
7. The URL is: https://juststopoil.org/2024/07/16/just-stop-oil-letter-to-prime-minister-starmer/. A copy of the letter is at Exhibit "**AW1**".

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.



Alexander James Wright

17 July 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 –

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Defendants

AW1

This is the exhibit marked "AW1" in the Third Witness Statement of Alexander James Wright.



Just Stop Oil Letter to Prime Minister Starmer

Press / July 16, 2024

Dear Prime Minister,

We write to congratulate you on becoming Prime Minister and to acknowledge that one of the first steps of your new government has been to reaffirm your commitment to end new UK oil and gas licensing. This is an essential first step towards what is required to end the UK's contribution to the climate crisis. However, we all know that it is not enough.

We also need to rapidly phase out our existing oil and gas projects and to end the use of fossil fuels across our economy. This is not only the view of Just Stop Oil; the call for a rapid phase out of fossil fuels is backed by climate science, by global equity considerations, by international law and by global public opinion.

We last wrote to you in your role as leader of the Labour Party on 24 June to demand that, should you become our next Prime Minister, you immediately commit the UK government to **working with other**

We indicated that unless such assurances were provided by 12 July, we would be forced to take action to protect our communities by engaging in a campaign of noncooperation against fossil fuel use, at airports across the country.

We are writing now to let you know that since no such assurances have been received we remain in civil resistance and are preparing to take action, but that, as ever, we remain open to dialogue.

The era of fossil fuels is over. It's time to stop waging war on humanity.

Yours sincerely,

Just Stop Oil.

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

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

Website: https://juststopoil.org/

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

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

Twitter: https://twitter.com/JustStop_Oil

Youtube: https://juststopoil.org/youtube

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

Notes to Editors

[1] Just Stop Oil is working with an international network of groups to demand our governments establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fast, fair, and just transition. This can be accomplished by endorsing the Fossil Fuel Non-Proliferation Treaty Initiative and seeking a negotiating mandate to establish the treaty.

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

Critical seed funding for Just Stop Oil was provided by Climate Emergency Fund and Adam McKay in 2022

Just Stop Oil 'Blue Lights' policy: our policy is, and has always been, to move out of the way for emergency vehicles with siren sounding and 'blue lights' on.

← Previous Post

Support
Just Stop Oil

Donate

Join Our Mailing List

EMAIL SUBSCRIPTION FORM

Email *

First Name *

Mobile Number *, 07400 123456

I'm happy to get occasional texts and calls about specific actions or about events I've signed up to.

Not in GB?

SUBMIT

Opt in to email updates from Just Stop Oil

Follow us on social media.

About us

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

Our new demand: That the UK Government sign up to a Fossil Fuel Treaty to Just Stop Oil by 2030.

Our governments must work together to establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fast, fair, and just transition.

This can be accomplished by endorsing the Fossil Fuel Non-Proliferation Treaty Initiative and seeking a negotiating mandate to establish the treaty.

FAQs | **The Campaign** | **Research**

Contact us

Press enquiries: juststopoilpress@protonmail.com
General enquiries: info@juststopoil.org
Donation enquiries: juststopoilgiving@protonmail.com
Volunteer enquiries: jsovolunteers@gmail.com
Book a speaker: contact@juststopoil.org

SIGN UP FOR OUR NEWSLETTER

First Name

Last Name

Email *

Mobile Number, 07400 123456

REGION (TO ADD YOU TO THE CORRECT REGIONAL MAILING LIST) *

East of England

ARE YOU A STUDENT? (IF YES, WE CAN ADD YOU TO OUR STUDENTS SPECIFIC EMAILING LIST)

☐ Yes

Not in GB?

ADD YOUR NAME

☑ Opt in to email updates from Just Stop Oil

Sponsored by: Just Stop Oil

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Just Stop Oil Privacy Policy

Party: Claimants
Name: Alexander James Wright
Number: Fourth
Date: 18.07.2024
Exhibit: AW1

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)

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(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

FOURTH WITNESS STATEMENT OF

ALEXANDER JAMES WRIGHT

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 ("**My First Witness Statement**") and my second and third witness statements of 17 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.

5. I refer to an exhibit marked **"AW1"** in this statement. They have been produced to me and I verify that the documents in those exhibits are true copies of the documents.

Newcastle International Airport – Plan 3A

1. My First Witness Statement refers to a plan titled 'Plan 3A' (which is exhibited to my First Witness Statement at Exhibit AW9).

2. Following the production of that plan, the Third Claimant identified that part of the land which is shown on it as a 'Wholly Third Party Area' to the East / South-East of the airport site was recently returned into the immediate ownership and control of the Third Claimant following a surrender of the relevant area of land from a third party tenant farmer (to whom the land was previously let).

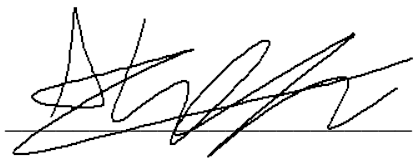
3. 'Plan 3A' exhibited to my First Witness Statement does not show this. An updated version of Plan 3A which reflects the above is exhibited to this witness statement at **Exhibit AW1**.

Statement of truth

I believe that the facts stated in this Witness Statement and Exhibit 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.



Alexander James Wright

18 July 2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N

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(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
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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)

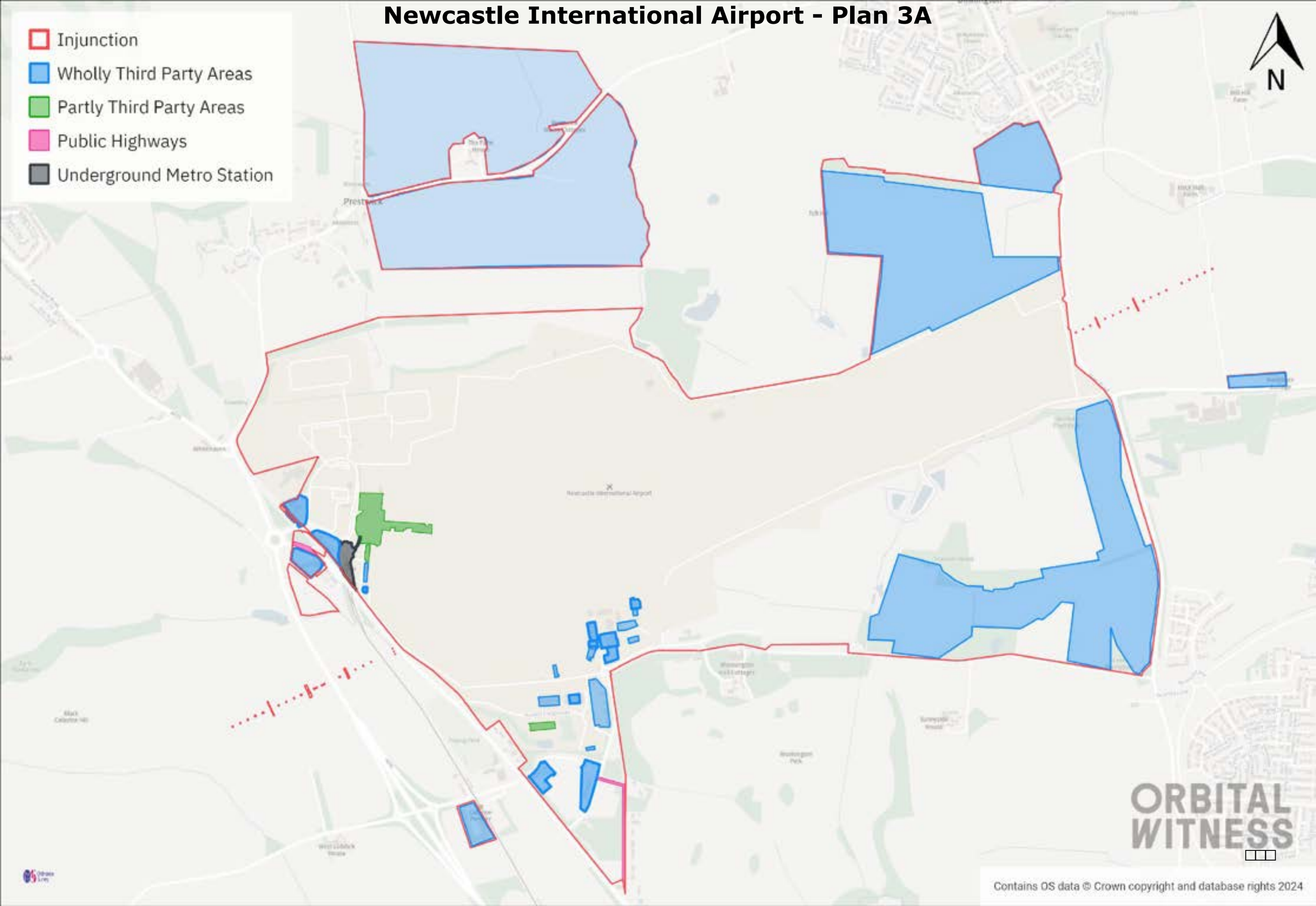
(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE 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

AW1

This is the Exhibit marked "AW1" in the Fourth Witness Statement of Alexander James Wright

Newcastle International Airport - Plan 3A



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N244

Application notice

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

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Name of court **The High Court of Justice** **King's Bench Division**	**Claim no.** **KB-2024-2317**
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
	H W F - - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Leeds Bradford Airport Ltd and others	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	2 June 2025 02 Jun 2025

HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
KB-2024-002317

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

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

   If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?
   1. To list a hearing (time estimate 1 day) to review the injunction made by orders of Ritchie J dated 18 July 2024 (and amended pursuant to the slip rule on 19 July and 22 July 2024) on 20 June 2025 or as close to that date as is convenient for the Court.

   2. To consolidate the claim under CPR rule 3.1(2)(h), alternatively case manage and hear it under rule 3.2(i) and/or (p) with the following claims:
   (a) London City Airport Ltd and ors v PU - claim no KB-2024-001765;
   (b) Manchester Airport Plc and ors v PU - claim no KB-2024-002132; and
   (c) Birmingham Airport Ltd and ors v PU - claim no KB-2024-002473 ("**the Other Airports Claims**").

4. Have you attached a draft of the order you are applying for? ☒ Yes ☐ No

5. How do you want to have this application dealt with? ☐ at a hearing ☒ without a hearing
   ☐ at a remote hearing

6. How long do you think the hearing will last? ☐ Hours ☐ Minutes
   Is this time estimate agreed by all parties? ☐ Yes ☐ No

7. Give details of any fixed trial date or period
   N/A

8. What level of Judge does your hearing need?
   High Court Judge

9. Who should be served with this application?

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

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

☐ the attached witness statement

☐ the statement of case

☒ the evidence set out in the box below

If necessary, please continue on a separate sheet.

1. The orders of Ritchie J are attached, together with the orders made by:-

   (a) Julian Knowles J dated 20 June 2024 made in claim no KB-2024-001765

   (b) HHJ Coe KC dated 5 July 2024 made in claim no KB-2024-002132; and

   (c) Jacobs J dated 6 August 2024 made in claim no KB-2024-002473.

The review hearing

2. Paragraph 2 of the Orders of Ritchie J in the instant case provide for those Orders to be reviewed *"... at intervals not exceeding 12 months"*.

3. The Claimants invite the Court to list the review hearing pursuant to paragraph 2 of that order on 20 June 2025 or as soon as is convenient thereafter.

4. No time estimate was provided for in the order of Ritchie J.

Consolidation / case management with the Other Airports Claims

5. All of the injunctions granted in the Other Airports Claims are subject to review at 12 month intervals and the Claimants in those cases also seek review of the injunctions and have, by Eversheds Sutherland (International) LLP also made applications of even date to this application (and also for consolidation or case management with this case and the Other Airports Claims.

6. In those cases:-

   (a) Paragraph 3 of the Order of Julian Knowles J made in claim number KB-2024-001765 provides for a time estimate of 1.5 hours for the hearing of the review application made in that claim.

   (b) Paragraph 2 of the order of Jacobs J dated 6 August 2024 made in claim number KB-2024-002473 provides a time estimate of 2.5 hours for the hearing of the review of the injunction made in that claim.

   (c) No time estimate is provided in HHJ Coe KC's order. However, it is anticipated that a similar time estimate would be required.

7. In view of the similarity of factual and legal issues in this claim and the Other Airports Claims, it would be beneficial for the claims to be consolidated, alternatively case managed and heard together, in order to determine the cases in accordance with the overriding objective and in specific to (a) minimise the demands placed on the court resources by a multiplicity of hearings which would require more than a day of court time; and (b) avoid the risk of inconsistent decisions.

8. The Court is invited to make an order on the papers in the form of the draft order. The Claimants will notify the Defendants of any order made by the Court and the application following the making of the order.

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

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

☒ No

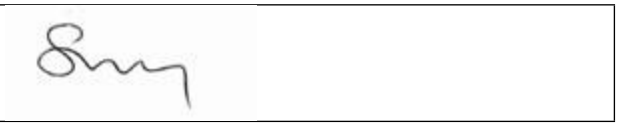
Statement of Truth

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

☒ **I believe** that the facts stated in section 10 (and any continuation sheets) are true.

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

Signature



☐ Applicant

☐ Litigation friend (where applicant is a child or a Protected Party)

☒ Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
2	June	2025

Full name

Stuart Sherbrooke Wortley

Name of applicant's legal representative's firm

Eversheds Sutherland (International) LLP

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

Partner

Applicant's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Greater London

Postcode

E	C	2	V	7	W	S

If applicable

Phone number

0771 288 1393

Fax phone number

DX number

Your Ref.

SSW

Email

stuartwortley@eversheds-sutherland.com

Party: *Claimants*
Name: *S S Wortley*
Number: *First*
Date: *06.06.25*
Exhibits: *"SSW1" – "SSW5"*

CLAIM NO: KB-2024-2317

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

I STUART SHERBROOKE WORTLEY of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a partner in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants.

2. On 18.07.24, Mr Justice Ritchie granted injunctions to restrain the Defendants from entering, occupying or remaining on Leeds Bradford Airport, London Luton Airport and Newcastle International Airport (as defined in those Orders) until varied, discharged or extended by further order.

3. Paragraph 2 of the Orders provided for each of those injunctions to be reviewed by the Court periodically at intervals not exceeding 12 months.

4. I make this witness statement for the purposes of the review hearing which has been listed on 24.06.25.

2024 Airport Injunctions

5. Between 20 June and 14 August 2024, the following injunctions were granted to protect airports against environmental protestors opposed to the use of fossil fuels.

	Airport	**Action Number**	**Judge / Date of Order**
1	London City Airport	KB-2024-001765	Mr Justice Julian Knowles 20 June 2024
2	Manchester Airport Stansted Airport East Midlands Airport	KB-2024-002132	HHJ Rosalind Coe 5 July 2024
3	Heathrow Airport	KB-2024-002210	Mr Justice Julian Knowles 10 July 2024
4	Leeds Bradford Airport Luton Airport Newcastle Airport	KB-2024-002317	Mr Justice Ritchie 18 July 2024
5	Gatwick Airport	KB-2024-002336	Mr Justice Ritchie 19 July 2024
6	Birmingham Airport Bristol Airport Liverpool Airport	KB-2024-002473	Mr Justice Jacobs 6 August 2024
7	Southend Airport	KB-2024-002596	Mrs Justice Farbey 14 August 2024

6. Last year it was possible to achieve a certain amount of co-ordination with a view to saving costs and limiting the demands placed by these matters on Court resources, in that my firm acted in 4 out of the 7 actions listed above (numbers 1, 2, 4 and 6). However, our instructions arrived over time rather than all at once, and so multiple hearings were needed, despite the common ground between the different matters.

7. Although the precise terms of the Orders vary slightly, each of the injunctions granted in actions 1, 2, 4 and 6 in the table effectively provides for an annual review.

8. This year, therefore, there is the potential to achieve better co-ordination with a better use of the Court's time: Leeds Bradford, London Luton and Newcastle Airports

and the 7 other airports involved in actions 1, 2 and 6 have decided to join together and to ask the Court to undertake the annual review at the same hearing. I was not instructed in relation to the other airports last year (Heathrow, Gatwick and Southend): I believe they remain represented by other firms of solicitors. I understand that the solicitors for Heathrow and Southend Airports have arranged a review hearing sometime next month.

9. The Order in action 1 provided for a review hearing of 1.5 hours duration. The Order in action 6 provided for a review hearing of 2.5 hours duration. The Orders in this action and action 2 did not specify a time estimate for the review hearing. The Court has now listed the review hearings in all 4 actions together, with a time estimate of 1 day on 24 June 2025.

10. I make this witness statement in support of the review of the London City Airport injunction. I will be repeating or adopting much of the content of this witness statement in my statements in support of the annual reviews of the injunctions granted in the other actions.

Service of the Order dated 18.07.24

11. Each of the documents required to be served by the Orders dated 18.07.24 was served in accordance with paragraph 3 and in each case the last step took place on 26.07.24. My colleague Alex Wright filed a Certificate of Service dated 12.08.24.

The Plans

12. The injunctions granted in this action and in actions 2 and 6 in the table above and were based on the relevant airport byelaws (and therefore extend to all of the land which is subject to the Byelaws including land over which the Claimant would not be entitled to legal possession – including for example highways land and areas which are demised to third parties).

13. The injunctions in this case extends to the land edged red on Plan 1 (Leeds Bradford Airport), Plan 2 (London Luton Airport) and Plan 3 (Newcastle International Airport).

14. I am informed by Krystal Hayes, Legal Counsel for Leeds Bradford Airport that there have been no changes to the Leeds Bradford Airport Byelaws 2022 and that the Plan attached to the Leeds Bradford Airport Order dated 18.07.24 (as amended on 19 and

22.07.24) remains accurate. Although the terminal building has been extended since the Order granted last year, the building footprints are not shown on the Plan. The extended building remains entirely within the red line on that plan.

15. I am informed by David Norris, Head of Legal at London Luton Airport that there have been no changes to the London Luton Airport Byelaws 2005 and that the Plan attached to the London Luton Airport Order dated 18.07.24 remains accurate. I am further informed by Mr Norris that a revised set of London Luton Airport Byelaws is awaiting approval but that as and when the new Byelaws are introduced, that this will not affect the relief in these proceedings.

16. I am informed by Mark Hunt, Chief Financial Officer for Newcastle International Airport that there have been no changes to the Newcastle International Airport Byelaws 2021 and that the Plan attached to the Newcastle International Airport Order dated 18.07.24 remains accurate.

UK Airport Protests

17. The table below records a summary of the protests against UK airports which took place in June – August 2024. It also includes a summary of the arrests, convictions and subsequent sentencing and other relevant incidents occurring after August 2024.

02.06.24	Extinction Rebellion conducted a protest at Farnborough Air Show which involved blocking the 3 main gates and parking the Extinction Rebellion pink boat across the Gulfstream gate
20.06.24	Two JSO activists sprayed 2 aircraft at London Stanstead Airport with orange paint after cutting through the perimeter fence at around 5.00 am
25.06.24	Four JSO activists were arrested at Gatwick Airport railway station equipped with suitcases containing bandages (suspected to have been intended to force the airport to close owing to the risk of damage to aircraft engines in the event of them being released near aircraft)
27.06.24	Six JSO activists were arrested at a meeting in London pursuant to powers in the Public Order Act 2023
19.07.24	Roger Hallam (along with four other JSO activists) had been found guilty of conspiring to organise protests to block the M25 motorway in November 2022 Mr Hallam was sentenced to 5 years imprisonment and each of the others were sentenced to 4 years imprisonment (reduced by the Court of Appeal on 07.03.25 – see below)

24.07.24	Ten JSO activists were arrested at Heathrow Airport as part of an intelligence led operation - some were equipped with cutting gear and glue
27.07.24	A protest which was due to be held at London City Airport was relocated to the Department of Transport on Horseferry Lane
29.07.24	Eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure
30.07.24	Two JSO activists were arrested at Heathrow Airport after spraying orange paint around the Terminal 5 entrance hall and on the destination boards in the departure lounge
31.07.24	A protest by JSO and Fossil Free London was held at the Docklands Light Railway station at City Airport JSO and Fossil Free London both uploaded photographs of the protest with the following message:- *"We've been served with an injunction which means even walking out of the wrong exit of this station could get us arrested."*
01.08.24	Six JSO activists blocked access to the departure gates at Heathrow Terminal 5
05.08.24	Five JSO activists were arrested on their way to Manchester Airport equipped with bolt cutters, angle grinders, glue, sand and banners carrying slogans including "oil kills".
16.01.25	The trial of the two JSO activists arrested at Heathrow Airport on 30.07.24 resulted in a hung jury
02.02.25	Extinction Rebellion held a demonstration at Farnborough Airport following a consultation period in relation to Farnborough Airport's expansion plans which ended in October 2024
17.02.25	Extinction Rebellion held a demonstration at Inverness Airport waving banners with *"Ban Private Jets"* and *"We're in a climate emergency, we need to step up and take action"*
21.02.25	Of the five JSO activists arrested on their way to Manchester Airport on 05.08.24, four were found guilty of conspiracy to commit a public nuisance and one was acquitted with sentencing adjourned to 23.05.25
07.03.25	The Court of Appeal delivered judgment in a conjoined appeal by sixteen JSO activists against sentencing Two of the sentences passed on 19.07.24 were reduced by 18 months (from 4 years to 30 months), the other three were reduced by a year (from 5 to 4 years in Roger Hallam's case and from 4 to 3 years in the other two)

	Of the other eleven appeals, one was reduced by 2 months but the other ten appeals were dismissed
20.03.25	Of the ten JSO activists arrested at Heathrow Airport on 24.07.24, nine were found guilty of conspiracy to cause a public nuisance at Heathrow Airport with sentencing adjourned to 16.05.25
27.03.25	Just Stop Oil announced the end of their campaign (see below)
27.03.25	On the same day as the JSO announcement, Youth Demand held a meeting to discuss issues including the climate crisis and a fresh wave of civil resistance in London in the Westminster Quaker Meeting House Six individuals were arrested
27.04.25	Youth Demand activists threw bright pink powder over elite runners participating in the London marathon as they crossed Tower Bridge The individuals taking part wore T-shirts that read "Youth Demand – Stop Arming Israel" – which appears to be their primary cause
16.05.25	Of the nine individuals convicted on 20.03.25, five were sentenced to terms of imprisonment of up to 15 months and four were given suspended sentences
27.05.25	Each of the four individuals convicted on 21.02.25 was sentenced to a term of imprisonment of between 18 and 30 months

18. Copies of media articles relating to the events recorded in this table are attached to this statement marked **"SSW1"**.

19. A copy of the Court of Appeal decision handed down on 07.03.25 is attached at **"SSW2"**.

20. The fact that the protest on 27.07.24 was relocated from London City Airport to the Department of Transport and the fact that the JSO and Fossil Free London protestors conducted their protest from outside the red line of the injunction plan demonstrate that the injunction granted by Mr Justice Julian Knowles in that case on 20.06.24 served its purpose. In both instances peaceful protests were went ahead but without causing unlawful interference to users of London City Airport.

27.03.25 – JSO Announcement

21. As noted in the chronology above, on 27.03.25, Just Stop Oil made the following announcement:-

"Three years after bursting on the scene in a blaze of orange, at the end of April we will be hanging up the hi vis.

Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful.

So it is the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison. We have exposed the corruption at the heart of our legal system, which protects those causing death and destruction while prosecuting those seeking to minimize harm. Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK's oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen.

This is not the end of civil resistance. Governments everywhere are retreating from doing what is needed to protect us from the consequences of unchecked fossil fuel burning. As we head towards 2°C of global heating by the 2030s, the science is clear: billions of people will have to move or die and the global economy is going to collapse. This is unavoidable. We have been betrayed by a morally bankrupt political class.

As corporations and billionaires corrupt political systems across the world, we need a different approach. We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Nothing short of a revolution is going to protect us from the coming storms.

We are calling on everyone who wants to be a part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. Sign up here. See you on the streets.

ENDS"

22. Copies of media articles relating to this announcement and to the "final" JSO protest which took place in central London on 26.04.25 are attached marked **"SSW3"**.

18.05.25 - We are "plotting a very big comeback"

23. Whilst the announcement referred to above suggests that the risk of unlawful protests at UK airports has reduced, on 18.05.25 the following story appeared on GB News (both on television and on-line):-

"Now, I was getting pretty bored of the juvenile antics at the altar of climate change.

We've seen it all vandals throwing soup over priceless artworks in galleries, defacing Stonehenge, ambushing theatre productions in the West End, blocking traffic, scaling motorway gantries, dousing

private jets in paint, and even disrupting sports events all just to spoil the fun for everyone else.

Remember them? They said they were disbanding after the government appeared to adopt their demand to end new oil and gas licences in Britain. Their actions, of course, cost the public tens of millions in police and court time.

But despite Ed Miliband bowing to their demands, I can exclusively reveal that Just Stop Oil is plotting a very big comeback.

On Ben Leo Tonight, we have gained access to secret Just Stop Oil meetings, where members are discussing a dramatic U-turn—planning to cause chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and even carrying out "citizens' arrests" on so-called climate criminals.

Speaking during an online meeting on Thursday night, one coordinator—known only as "Dave"—said protests should remain "action-based" and warned against becoming more peaceful, like Greenpeace.

The meeting continued with Dave insisting that it was essential to keep doing what he called the "spicy and naughty stuff" to generate media attention.

The group also discussed how to feed new protest ideas back to what they referred to as a "core team". There was frustration over communication with this mysterious leadership group, with some suggesting using 50-word briefs to make it easier for them to process ideas.

It raises serious questions: Who exactly is this core team? Who are these professional protesters reporting to—and who's funding them?

Chillingly, the group also spoke about carrying out citizen's arrests on so-called climate deniers. There was some introspection as well, with members questioning whether their public image was doing more harm than good.

But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to proceed with Just Stop Oil's revival, including talk of keeping protesters in safe houses to maintain morale.

Let's be clear: what we're dealing with here is a group of climate zealots plotting to commit criminal acts, backed by who knows what kind of funding, and being housed like some kind of eco-mafia.

And speaking of coordination—let's not pretend the climate agenda is a spontaneous grassroots movement. It's organised. It's funded. It's political.

So, who's paying to bus these protesters from London to Stonehenge, to airports, to art galleries and sports stadiums? Who's funding the Just Stop Oil safe houses where these scruffy, self-

righteous agitators meticulously plan how to make Britain colder and poorer?

The police and the government must crack down on Just Stop Oil's plans for criminality before they gain traction again.

The last thing Britain needs is more disruption, more vandalism, and more self-indulgent eco-activism especially when a Labour government is already happily marching to the drumbeat of Net Zero extremism.

We'll be passing our findings to the police."

24. For my part, I acknowledge the possibility that this is tainted by sensationalism. However, JSO did not take efforts to repudiate what had been alleged. Instead, on 21.05.25, JSO circulated a link to the GB News story in a message to subscribers together the following comment:-

"GB News was right for once. We are "plotting a very big comeback".

25. Copies of the GB News story and the JSO message to subscribers are attached to this message marked **"SSW4"**.

Other Environmental / Climate Campaign Groups

26. Apart from JSO, there are other protest groups who are opposed to the use of fossil fuels including for example, Youth Demand (the junior branch of JSO formerly known as Youth Climate Swarm), Extinction Rebellion and Fossil Free London.

27. Extinction Rebellion ("XR") remains an active organisation both in the UK and internationally:-

    27.1. on 07.09.24, XR activists chained themselves to the gates of the Rijksmuseum in Amsterdam in an attempt to force the museum to sever ties with ING Bank;

    27.2. on 25.09.24, XR activists covered the Finnish Parliament House with red paint;

    27.3. on 23.05.25, XR activists held a climate protest against Total Energies and its partners – including the occupation of BNP Paribas' offices in Paris.

28. Fossil Free London is another protest group involved in direct action. Their website includes videos which promote the right protest and training videos relating to direct action.

29. A relatively new organisation which is campaigning against the fossil fuel industry is "shut the system". In January 2025, this group cut fibre optic cables to Lloyds of London and prominent buildings involved in the insurance sector on Fenchurch Street, Threadneedle Street, Leadenhall Street and Lime Street in London (and in Birmingham, Leeds and Sheffield).

30. An article concerning this story is attached to this statement marked **"SSW5"**.

Police Advice

31. On 21.05.25, the Metropolitan Police sent an email to the security team at London City Airport which included the following:-

> *" … the injunction at HAL [Heathrow Airport Limited] had a real impact on the Shell protest yesterday and builds on your experiences. To remove an injunction now would open up to further protest and whilst JSO have stepped down there appears to be a cycle of new groups emerging and this cannot be ruled out so maintaining it would be very much recommended."*

32. I believe the reference to *"… the Shell protest …"* relates to the Annual General Meeting of Shell plc held at the Soffitel Hotel at Heathrow Terminal 5 on 20.05.25. The Metropolitan Police told London City Airport's security team that a protest by environmental protest groups:-

> "*were forced to hold their protest at the Shell head office in central London rather than the AGM location at a hotel within the Heathrow Airport injuncted area, in order to avoid the risk of associated penalties for breaching of the injunction*."

33. I believe the references to *"… your experiences …"* is a reference to the events referred to in paragraph 19 above – including the fact that one of the protests due to take place at London City Airport was relocated to the Department of Transport.

34. A copy of the email (from which I have redacted personal information) is attached to this statement marked **"SSW6"**.

Conclusion

35. I am informed by Kunaal Wharfe, Mee-Ling Skeffington and Mark Hunt and believe the Claimants' directors have concluded that they should ask the Court to extend the injunction for a further 12 months. I understand that they reached this decision after

having considered carefully whether the threat which was clearly present last year has abated materially, especially in light of the JSO announcement in March.

36. Obviously, the question of whether the injunction has outlasted its need, is one for the judgment of the Court. However, based on the material to which I have referred, the Claimants (and, for what it is worth, I also) consider that there remains a compelling need for the injunction to remain in place. Climate change remains firmly on the political agenda. It continues to attract strong feelings and is still a subject about which campaigners are willing to contemplate disruptive action. The inference drawn by the Claimants (and by me) is that the injunctions granted over time have influenced the pattern of protest, which disruptive action being focused principally on targets which do not have the benefit of the Court's protection by way of injunction. The Claimants (and I) consider that the risk remains high that airports generally, including theirs, would come back into focus, if the injunction were now to be lifted. JSO's seeming change of heart in March 2025 was not adopted by all other campaign groups; and even as a statement of JSO's position, later events have shown that it was not an immutable repudiation of disruptive protest. The Claimants (and I) cannot discount the possibility, that JSO's March 2025 announcement may have been partly tactical: to make renewal of the injunctions harder — and disruptive protest at the airports correspondingly less risky. The risks are especially acute at this time of year: most of the incidents in which UK airports were targeted by environmental protestors in 2024 occurred between late June and August 2024 - the busiest period for holiday travel.

Notice of the Review Hearing

37. The Claimants intend to give notice of the review hearing in the manner provided for in para 3 of Order dated 18.07.24 – namely by:-

    37.1. Uploading a copy of the application dated 02.06.25, the draft Order, a copy of this witness statement and exhibits and details of the review hearing to each of the injunction websites;

    37.2. sending copies of the documents referred to in the previous paragraph to the email addresses referred to in Schedule 3 to the Order dated 18.07.24 plus the following additional email addresses (noting that "Shut The System" does not operate a website and although "Fossil Free London" does have a website, this does not include an email address):-

YouthDemandPress@protonmail.com

37.3. affixing a notice at each of the warning notice locations at each airport referring to the time and date of the review hearing and explaining where copies of the additional papers can be found and obtained in hard copy.

I believe that the facts stated in this Witness Statement and Exhibits are true.

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

I am duly authorised to make this statement on behalf of the Claimants.



_____

Stuart Sherbrooke Wortley

6 June 2025

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) BIRMINGHAM AIRPORT LIMITED

AND FIVE OTHERS

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the injunction made by Order dated 6 August 2024 by Jacobs J ("**the Jacobs J Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (**"the Claims"**)

AND UPON reading the application and the witness evidence in support

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Jacobs J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Jacobs J Order

2. Paragraph 2 of the Jacobs J Order is amended so as to read:

   "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 and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) BIRMINGHAM AIRPORT LIMITED

AND FIVE OTHERS

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

□□□

UPON the Claimants' claim by the claim form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024

AND UPON the injunction made by Order dated 6 August 2024 by Jacobs J ("**the Jacobs J Order**")

AND UPON the Claimants' application dated 2 June 2025 ("**the Application**")

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 ("**the Claims**")

AND UPON reading the application and the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Jacobs J Order

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Birmingham Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the Jacobs J Order

DEFINITIONS

"**Birmingham Airport**" means the land shown in red outlined in red on Plan 1 to the Claim Form appended to this Order in Schedule 1 ("**Plan 1**")

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

https://corporate.birminghamairport.co.uk/injunction/ at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendants and each of them are forbidden from entering, occupying or remaining on any part of Birmingham Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant (or any of them).

2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the First Defendants by:

    a. Uploading a copy onto the following website: https://corporate.birminghamairport.co.uk/injunction/

    b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.

    c. Affixing a notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the First Defendants and each of them.

6. The Court will provide sealed copies of this Order to the Claimants' solicitors for service or notification (whose details are set out below).

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the First Defendants of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The First Claimant have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 1 will be the same as Plan 1 attached to the Jacobs J Order

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant will take steps to serve the First Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

(2) The First Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED

AND FOUR OTHERS

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the injunction made by Order dated 06 August 2024 by Jacobs J ("**the Jacobs J Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (**"the Claims"**)

AND UPON reading the application and the witness evidence in support

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Jacobs J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Jacobs J Order

2. Paragraph 2 of the JacobsJ Order is amended so as to read:

   "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 and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED

AND FIVE OTHERS

Claimants

-and-

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the Claimants' claim by the claim form dated 31 July 2024

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AND UPON the Claimants' application for an injunction dated 31 July 2024

AND UPON the injunction made by Order dated 6 August 2024 by Jacobs J ("**the Jacobs J Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 ("**the Claims**")

AND UPON reading the application and the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Jacobs J Order

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Liverpool Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the Jacobs J Order

DEFINITIONS

"**Liverpool Airport**" means the land shown in red outlined in red on Plan 2 to the Claim Form appended to this Order in Schedule 1 ("**Plan 2**")

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.liverpoolairport.com/injunction at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendants and each of them are forbidden from entering, occupying or remaining on any part of Liverpool Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First, Second and Third Claimants (or any of them).

2. This Order is subject to periodic review by the Court on application by the Second and Third Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the First Defendants by:

    a. Uploading a copy onto the following website: https://www.liverpoolairport.com/injunction

    b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.

    c. Affixing a notice at those locations marked with an "X" on Plan 2 setting out where these documents can be found and obtained in hard copy in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Second Defendants and each of them.

6. The Court will provide sealed copies of this Order to the Claimants' solicitors for service or notification (whose details are set out below).

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the Second Defendants of any further applications or documents in the proceedings by the Second and Third Claimants shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The Second and Third Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 1 will be the same as Plan 1 attached to the Jacobs J Order

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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND AND THIRD CLAIMANT

(1) The Second and Third Claimants will take steps to serve the Second Defendants with a note of the hearing which took place on 24 June 2025 by 4pm 27 June 2025.

(2) The Second and Third Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

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SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

AND THREE OTHERS

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the injunction made by Order dated 06 August 2024 by HHJ Jacobs ("**the Jacobs J Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (**"the Claims"**)

AND UPON reading the application and the witness evidence in support

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Jacobs J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Jacobs J Order

2. Paragraph 2 of the Jacobs J Order is amended so as to read:

   "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 and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day."

3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

AND THREE OTHERS

Claimants

-and-

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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IMPORTANT NOTICE TO THE DEFENDANTS

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UPON the Claimants' claim by the claim form dated 31 July 2024

□□□

AND UPON the Claimants' application for an injunction dated 31 July 2024

AND UPON the injunction made by Order dated 6 August 2024 by Jacobs J ("**the Jacobs J Order**")

AND UPON the Claimants' application dated 2 June 2025

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (**"the Claims"**)

AND UPON reading the application and the witness statement of Stuart Sherbrooke Wortley dated 6 June 2025

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Jacobs J Order

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Bristol Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the Jacobs J Order

DEFINITIONS

"**Bristol Airport**" means the land shown in red outlined in red on Plan 3 to the Claim Form appended to this Order in Schedule 1 ("**Plan 3**")

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.bristolairport.co.uk/corporate/about-us/our-policies/injunction/ at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendants and each of them are forbidden from entering, occupying or remaining on any part of Bristol Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Fourth, Fifth and Sixth Claimants (or any of them).

2. This Order is subject to periodic review by the Court on application by the First, Second, Third, Fourth, Fifth and Sixth Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the Third Defendants by:

    a. Uploading a copy onto the following website: https://www.bristolairport.co.uk/corporate/about-us/our-policies/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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Third Defendants and each of them.

6. The Court will provide sealed copies of this Order to the Claimants' solicitors for service or notification (whose details are set out below).

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the Third Defendants of any further applications or documents in the proceedings by the Fourth, Fifth and Sixth Claimants shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The Fourth, Fifth and Sixth Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 3 will be the same as Plan 3 attached to the Jacobs J Order

□□□

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FOURTH, FIFTH AND SIXTH CLAIMANT

(1) The Fourth, Fifth and Sixth Claimants will take steps to serve the Third Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

(2) The Fourth, Fifth and Sixth Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

□□□

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

CPR 17.1(1)

Claim Form

In the	
Fee Account no.	
Help with Fees - Ref no. (if applicable)	**H W F** – –

You may be able to issue your claim online which may save time and money. Go to www.moneyclaim.gov.uk to find out more.

	For court use only
Claim no.	KB-2024-002473
Issue date	31 July 2024

Claimant(s) name(s) and address(es) including postcode

(1) BIRMINGHAM AIRPORT LIMITED of Dia
26

(2) LIVERPOOL AIRPORT LIMITED of
M4

(3) PEEL L&P INVESTMENTS (NORTH) LIMITED of
M4

(4) BRISTOL AIRPORT LIMITED of
4

(5) SOUTH WEST AIRPORTS LIMITED of
4

(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED of Lulsgate House, Bristol Airport, Bristol BS48 3DW

SEAL
HIGH COURT OF JUSTICE
06 Aug 2024
QUEEN'S BENCH DIVISION
KB-2024-002473

Defendant(s) name and Address(es) including postcode

Brief details of claim

Value

Defendant's name and address for service including postcode

	£
Amount claimed	
Court fee	
Legal representative's costs	
Total amount	

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

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Claim no.	

You must indicate your preferred County Court Hearing Centre for hearings here (see notes for guidance)

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

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

☐ No

Does, or will, your claim include any issues under the Human Rights Act 1998?

☐ Yes

☐ No

Claim no.	

Particulars of Claim

☐ attached

☐ to follow

Statement of truth

Note: you are reminded that a copy of this claim form must be served on all other parties.

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

☐ **I believe** that the facts stated in this claim form and any attached sheets are true.

☐ **The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

Signature



☐ Claimant

☐ Litigation friend (where claimant is a child or protected party)

☐ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day | Month | Year

Full name

Name of claimant's legal representative's firm

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

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

Second line of address

Town or city

County (optional)

Postcode

If applicable

Phone number

DX number

Your Ref.

Email

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

Amended Schedule 1 to Claim Form

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

Amended pursuant to CPR 17.1(1)

CLAIM NO: KB – 2024 -002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v –

~~(1)~~ PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

Defendants

AMENDED PARTICULARS OF CLAIM

□□□

Birmingham Airport

1. The First Claimant is the operator of Birmingham Airport, located in Airport Way, Birmingham B26 3QJ, shown edged in red on Plan 1 ("**BHX**"). BHX serves around 11.8 million travelling passengers each year with an annual revenue of approximately £152 million.

2. With the exception of the parcels of land referred to in paragraph 9, the First Claimant is the registered proprietor of all of the land on which BHX is situated as shown in red on Plan 1, through the interests shown in the Title Schedule and on Plan 1A attached hereto - but subject to the interests referred to in paragraph 4.

3. Subject to the aforesaid interests, the First Claimant is entitled to an immediate right of possession occupation and control of BHX by virtue of its titles as shown in the Title Schedule and on Plan 1A.

4. Plan 1B identifies the areas within BHX over which the First Claimant lacks (or does not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests ("**the BHX Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First Claimant does not assert that it is the person with an immediate right of occupation or possession.

5. The BHX Third Party Areas are coloured blue and green on Plan 1B. The blue colouring indicates areas within BHX which are the subject of leases. The green colouring indicates parts of BHX which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

6. There are five areas coloured blue on Plan 1B (numbered 1-5) each of which directly abuts the red line boundary of BHX. In each of those locations, the boundary of BHX is not in the possession or control of the First Claimant.

7. With those exceptions, access to or from the BHX Third Party Areas by the public from outside the airport, necessarily involves the use of areas of BHX which remain unencumbered by any such arrangement and in relation to which, accordingly, the First Claimant remains entitled to possession occupation and control by virtue of their interests shown in the Title Schedule and on Plan 1A.



8. Within the BHX red line boundary, there are 3 parcels in respect of which the First Claimant is not the registered proprietor:-

    a. although the land on which the northern landing lights (coloured orange on Plan 1B) are situated is registered in the name of a third party company, the First Claimant asserts that it is entitled to the immediate right of occupation or possession of those lights and the structure which supports them. Some of the lights and some parts of the structure have been in place since around 1967 and others since 2008. All of the lights and structures have been maintained by the First Claimant or its predecessors throughout that period;

    b. on the south western boundary is an unregistered strip of land (coloured bright green on Plan 1A but omitted from the key on that plan) in respect of which the First Claimant asserts that it is entitled to the immediate right of occupation or possession; and

    c. on the eastern boundary is an Air Rail Link and an associated platform and station. By an agreement for lease dated 1 April 2013, Network Rail Infrastructure Limited agreed to grant and the First Claimant (then known as Birmingham International Airport Limited) agreed to take a lease of the land coloured purple on Plan 1B for a term of 199 years. The lease has not been completed but the First Claimant asserts that it is entitled to the immediate right of occupation or possession of the land coloured purple.

9. By virtue of s 63 of the Airports Act 1996, the First Claimant has power to make byelaws with respect to BHX. Pursuant to the Birmingham Airport Limited Byelaws 2021, byelaw 3.32, no person has a right to use any part of BHX as defined therein for demonstrations or public assemble which is likely to obstruct or interfere with the proper use of the airport or the safety or security of passengers or persons using the airport. The plan which defines BHX for the purposes of the byelaws does not extend to the landing lights. Apart from that, it includes all the land edged in red on Plan 1.

Liverpool Airport

10. The Second Claimant is the operator of Liverpool Airport, located in Speke Hall Avenue, Speke, Liverpool L24 1YD, shown edged in red on Plan 2 ("**LJLA**"). LJLA serves around 5 million travelling passengers each year with an annual revenue of approximately £35 million.

11. The Second Claimant is the proprietor of the land on which LJLA is situated as shown in red on Plan 2, through the interests shown in the Title Schedule and Plan 2A attached hereto - but subject to the interests referred to in paragraph 14.

12. The Third Claimant has been joined to the proceedings as it is the registered proprietor of the land on which the western landing lights (coloured brown on Plan 2B) are situated, which is registered under Title Number MS575438.

13. Subject to the aforesaid interests, the Second Claimant (and the Third Claimant in respect of the western landing lights) is entitled to an immediate right of possession occupation and control of LJLA, by virtue of its titles as shown in the Title Schedule and Plan 2A.

14. Plan 2B identifies the areas within LJLA over which the Second Claimant lacks (or does not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the LJLA Third Party Areas**") or public rights of way ("**the LJLA Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Second Claimant does not assert that it is the person with an immediate right of occupation or possession.

15. The LJLA Third Party Areas are coloured blue and green on Plan 2B. The blue colouring indicates areas within LJLA which are the subject of leases. The green colouring indicates parts of LJLA which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

16. The LJLA Highways are indicated in pink on Plan 2B. These provide access to LJLA to the Second Claimant and its licensees (including members of the public).

17. Access to or from the LJLA Third Party Areas by the public from outside the airport, necessarily involves the use of areas of LJLA which remain unencumbered by any such arrangement and in relation to which, accordingly, the Second Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule and on Plan 2A.

18. All except 2 of the eastern landing lights (coloured orange on Plan 2B) are situated on title numbers CH596568 and CH384543 in respect of which the Second Claimant is the registered proprietor. The Second Claimant asserts that it is entitled to the



immediate right of occupation or possession of the other 2 landing lights and the structure which supports them which are situated on unregistered land. The lights and the structure which supports them have been in this location since around 1960 and they have been maintained by the Second Claimant or its predecessors throughout that period.

19. By virtue of s 63 of the Airports Act 1996, the Second Claimant has power to make byelaws with respect to LJLA. Pursuant to the Liverpool John Lennon Airport Byelaws 2022, byelaw 2.18, no person has a right to use any part of LJLA for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the landing lights, the plan which defines LJLA for the purposes of the byelaws includes all of the land edged in red on Plan 2.

Bristol Airport

20. The Fourth Claimant is the operator of Bristol Airport, located in Bristol BS48 3DY, shown edged in red on Plan 3 ("**BRS**"). BRS serves around 10 million travelling passengers each year with an annual revenue of approximately £179 million.

21. The Fourth, Fifth and Sixth Claimants are the proprietors of the land on which BRS is situated as shown in red on Plan 3, through the interests shown in the Title Schedule and Plan 3A hereto - but subject to the interests referred to in paragraph 23.

22. Subject to the aforesaid interests, the Fourth, Fifth and Sixth Claimants are entitled to an immediate right of possession occupation and control of BRS, by virtue of its titles as shown in the Title Schedule and Plan 3A.

23. Plan 3B identifies the areas within BRS over which the Fourth, Fifth and Sixth Claimants lack (or do not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the BRS Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fourth, Fifth and Sixth Claimants do not assert that they are the person with an immediate right of occupation or possession.

24. The BRS Third Party Areas are coloured blue and green on Plan 3B. The blue colouring indicates areas within BRS which are the subject of leases. The green colouring indicates parts of BRS which include such areas. By way of example, the

blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

25. Access to or from the BRS Third Party Areas by the public from outside the airport, necessarily involves the use of areas of BRS which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fourth, Fifth and Sixth Claimants remain entitled to possession occupation and control by virtue of its interests shown in the Title Schedule and on Plan 3A.

26. Although the land on which the western landing lights (coloured brown on Plan 3B) are situated is registered in the name of a third party individual, the Fourth Claimant asserts that it is entitled to the immediate right of occupation or possession of those lights and the structure which supports them. The lights and structure have been in place since around 2004 and have been maintained by the Fourth Claimant or its predecessors throughout that period.

27. By virtue of s63 of the Airports Act 1996, the Fourth Claimant has power to make byelaws with respect to BRS. Pursuant to the Bristol Airport Byelaws 2012, byelaw 4.17, no person has a right to organise or take part in any protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the landing lights, the plan which defines BRS for the purposes of the byelaws includes all the land outlined in red on Plan 3.

The Claimants' claims

28. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management / airline facilities and (in the case of BHX) the Air Rail Link railway.

29. In relation to each airport:

    a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at

the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).

b. No wider consent subsists; and (subject to the highways described above) no public right of access, or way, subsists over the airports.

c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.

d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

30. In relation to the Third Party Areas at each airport:

a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the Court to make an order which does not distinguish between the airports generally (as shown outlined in red on the various plans) and the Third Party Areas within them; and

b. Further or alternatively, protest which occurs on the Third Party Areas interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.

a. The like considerations apply in in relation to those of the landing lights not in the outright possession of the Claimants.

31. Further, in respect of the LJLA Highways described above: protest which occurs on these highways interferes and/or threatens to interfere:

b. Unreasonably and substantially, with the Second and Third Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;

c. Unreasonably and substantially, with (and/or to obstruct or hinder) the free passage along the highway, occasioning particular damage to the Second and Third Claimants; and

d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the byelaws.

The threats

32. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:

33. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations…"

34. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").

35. At this meeting, a co-founder of Just Stop Oil was reported to have advocated:

- Cutting through fences and gluing themselves to runway tarmac;
- Cycling in circles on runways;
- Climbing on to planes to prevent them from taking off;
- Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.

36. Since that meeting, Just Stop Oil has announced the following on its website:

"***SO WHAT'S THE PLAN?***

*Our Government doesn't give a f*** about its responsibilities. The country is in ruins. You know it, I know, they know it. That means it's up to us to come together and be the change we need.*

We need bold, un-ignorable action that confronts the fossil fuel elites. We refuse to comply with a system which is killing millions around the world, and that's why we have declared airports a site of nonviolent civil resistance."

We can't do this alone, we have a plan for this Summer, are you willing help make this happen?"

37. It says, further:

"***This summer, Just Stop Oil will be taking action at airports.***

As the grass becomes scorched, hosepipe bans kick in and the heat of the climate crisis enters peoples' minds, our resistance will put the spotlight on the heaviest users of fossil fuels and call everyone into action with us.

We'll work in teams of between 10-14 people willing to risk arrest from all over the UK. We need to be a minimum of 200 people to make this happen, but we'll be prepared to scale in size as our numbers increase. Exact dates and more details are coming.

Our plan can send shockwaves around the world and finish oil and gas. But we need each other to make it happen. Are you ready to join the team?"

38. Just Stop Oil has also organised a fundraising page on the website https://chuffed.org/project/just-stop-oil-resisting-against-new-oil-and-gas, which says the following:[1]

"***Cat's out the bag. Just Stop Oil will take action at airports***

The secret is out — and our new actions are going to be big.
We're going so big that we can't even tell you the full plan, but know this — Just Stop Oil will be taking our most radical action yet this summer. We'll be taking action at sites of key importance to the fossil fuel industry; ***super-polluting airports****.*

…"

39. On 6 June 2024, an email was sent from info@juststopoil.org to a subscriber list stating:

"This is the most exciting email I've ever sent.

As many of you already know, this summer Just Stop Oil is taking action at airports.

That's exciting right? Well, there's more.

[1] As of 29 July 2024, £24,519 had been raised on this website.

We won't be taking action alone.

Resistance groups across several countries in Europe have agreed to work together. That means this summer's actions will be internationally coordinated.

PICTURE OF AIRPORT ACTIONS SYMBOLISING INTERNATIONAL COMMUNITY (https://us02web.zoom.us/meeting/register/tZIoduqpqTMtE9dgMMhlaymvEZgO45jgJ19A)

People across Europe will be taking the fight to airports, the heart of the fossil economy.

This summer's actions across multiple countries will go down in history.

Want to meet the people making this happen?

Every Thursday for the next four weeks starting on the 13th of JUNE, 6.30pm

You don't want to miss this.

See you there,

Just Stop Oil"

40. On 2 June 2024, Extinction Rebellion environmental activists blocked access to Farnborough Airport.

41. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at London Stansted Airport (in an area which is subject to an occupational arrangement with a third party), as part of a series of protests on climate change. This included:

    a. an individual using an angle grinder to cut a hole in the perimeter fence of the airport;

    b. two individuals trespassing the perimeter fence; and

    c. spray painting two aircrafts orange using a fire extinguisher.

42. As a result of this direct action:

    a. It was necessary to suspend operations on the runway at Stansted Airport for approximately 50 minutes.

    b. the two individuals (known as Jenifer Kowalski and Cole Macdonald) were arrested and charged with causing criminal damage, aggravated trespass and interference with the use or operation of national infrastructure.

43. On 25 June 2024, six JSO activists were arrested at Gatwick Airport and were found to be carrying luggage containing a large number of bandages thought to have been intended to interfere with jet engines or to block lavatories.

44. On 27 June 2024, six JSO activists were arrested by the Metropolitan Police whilst attending an event organised by JSO.

45. On 29 June 2024, JSO sent an email to subscribers in the following terms:-

> *"**Since Tuesday, 31 supporters of Just Stop Oil have now been arrested** for possessing the strong convictions that governments and corporations do not have the right to prioritise oil profits over the safety and wellbeing of our loved-ones, communities and the many millions already suffering the effects of runaway climate breakdown.*
>
> *In a sane society, it would be those who are setting the stage for an end to ordered society that would be having their doors barged down and dragged into the back of a police van to be interrogated about the catastrophic criminal damages they are imposing on every living thing and on every future generation. Instead, it is ordinary people- mothers, grandparents and young people who are having their futures stolen from them, that the police come for.*
>
> ***The incoherent pattern of arrests we have seen over the last 24 hours suggests a rattled system**. They know that as climate breakdown intensifies, civil unrest will increase and one day there will not be enough police to cope with the millions stepping into action, as the full betrayal of the political establishment becomes clearer.*
>
> ***We will not be intimidated by the death throes of a broken system**. Nothing the state can throw at us is worse than the realities that will be imposed on all of us if the breakdown of our climate carries on unabated. We WILL be stepping into action in the summer because when the lives of your family are at risk, there is no other choice than to protect them…"*

46. On 24 July 2024, a further ten JSO activists were arrested at Heathrow Airport following an intelligence led operation. According to media reports, some of those arrested were found to be carrying cutting gear and glue.

47. On 28 July 2024, a further eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with national infrastructure.

48. On 29 July 2024, a further two JSO activists were arrested at Heathrow Airport after spraying orange paint around the entrance hall to Terminal 5.

49. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for BHX, LJLA and/or BRS:

    c. trespass on the airports and/or

    d. by protest conducted on or from the Third Party Areas and/or on or from the land on which the landing lights (which are not within the Byelaw plans) are situate, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or

    e. by protest conducted on or from the highways, obstruct those occasioning particular damage to the Claimants and/or interfere with the Claimants' right of access to the airports via those highways, so as to cause a nuisance actionable by the Claimants.

50. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.

51. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:

52. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.

53. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive — by which point harm may already have occurred.

54. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.

55. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.

56. The airports in the present case are all the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the Claimants are fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the Byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at Stansted Airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.

57. Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.

58. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND THE FIRST CLAIMANT CLAIMS AGAINST THE FIRST DEFENDANT:

(1) Subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months or such other period as the Court may determine,

an order that the First Defendants must not, without the consent of the First Claimant enter, occupy or remain upon the land outlined in red on Plan 1.

AND THE SECOND AND THIRD CLAIMANTS CLAIM AS AGAINST THE SECOND DEFENDANT:

(2) Subject to periodic review by the Court on application by the Second and Third Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent of the Second and Third Claimant, enter, occupy or remain upon the land outlined in red on Plan 2.

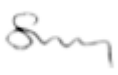
AND THE FOURTH, FIFTH AND SIXTH CLAIMANTS CLAIM AGAINST THE THIRD DEFENDANT:

(3) Subject to periodic review by the Court on application by the Fourth, Fifth and Sixth Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Third Defendants must not, without the consent of the Fourth, Fifth and Sixth Claimants (or either of them), enter, occupy or remain upon the land outlined in red on Plan 3.

STATEMENT OF TRUTH

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

I am duly authorised by the Claimants to sign this statement.



_____

Stuart Sherbrooke Wortley
Partner
Eversheds Sutherland (International) LLP

Dated: 31 July 2024

Party: *Claimants*
Name: *Stuart S Wortley*
Number: *Second*
Date: *06.08.24*
Exhibit: *"SSW14"*

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

and

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

I, Stuart Sherbrooke Wortley, of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. Paragraphs 23 to 28 of Graeme Gamble's witness statement **[HB/159-160]** are concerned with the BRS Airport Byelaws 2012 a copy of which is exhibited at **"GG1" [HB/167-186]**.

2. The reference to the BRS Airport Byelaws 2022 in paragraph 23 of Mr Gamble's witness statement is a typographical error (the correct date being 2012). The correct date is referred to in paragraph 5 of my Witness Statement dated 1 August 2024 **[HB/188]**.

3. The BRS Airport Byelaws 2012 were signed by Philip Graham on behalf of the Secretary of State for Transport on 1 January 2013 **[HB/185]**.

4. For the purposes of these byelaws, "the Airport" is defined as *"the aggregate of the land, buildings and works for the time being constituting Bristol Airport, shown delineated on the Plan."*

5. I am informed by Lydia Jacquety (who works with Mr Gamble at Bristol Airport) that in preparing these proceedings, the Fourth Claimant:-

    5.1. was unable to locate a copy of these byelaws which had been signed by Bristol Airport Limited;

    5.2. was only able to locate a black and white copy of the plan referred to in the definition of "the Airport" **[HB/171]**. A copy of this black and white plan is attached to this witness statement marked **"SSW14"**.

6. In preparing these proceedings, Mr Allybokus of my firm prepared a plan with a red line boundary plan (following the position of the airport boundary shown on the black and white plan).

7. For the avoidance of any doubt, and to ensure the colouring of the plan matches the definition of "the Airport" (but without making any other changes), and given the absence of any other signature on behalf of the Fourth Claimant, Mr Gamble signed the Bristol Airport Byelaws 2012 on 29 July 2024 **[HB/184]** having inserted a coloured plan into the byelaws **[HB/186]**.

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.



_____

Stuart Sherbrooke Wortley

6 August 2024

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

and

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

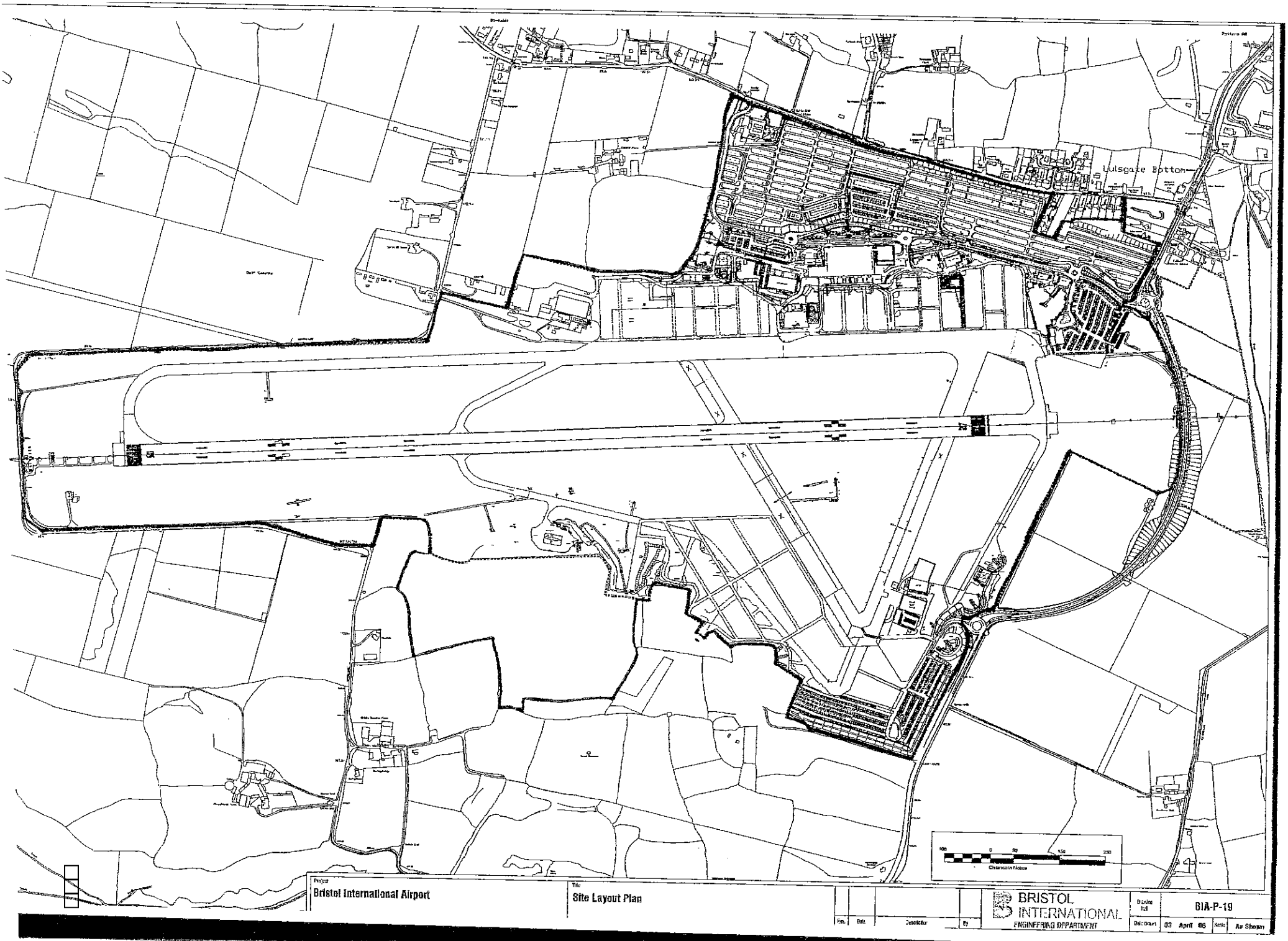
(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

"SSW14"

This is the exhibit marked SSW14 referred to in the Witness Statement of Stuart Sherbrooke Wortley dated 5th August 2024



Project
Bristol International Airport

Title
Site Layout Plan

No.	Date	Description	By

BRISTOL INTERNATIONAL
ENGINEERING DEPARTMENT

Drawing No: BIA-P-19

Date Drawn: 03 April 98

Scale: As Shown

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH AUGUST 2024

BETWEEN:-

(1) BIRMINGHAM AIRPORT LIMITED
AND FIVE OTHERS

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
06 Aug 2024
KB-2024-002473

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

BEFORE THE HONOURABLE MR JUSTICE JACOBS

ON 6 AUGUST 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

AND UPON the First Claimant giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Birmingham Airport, as defined by this Order, should be made by email to protestrequest@birminghamairport.co.uk

AND UPON the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

DEFINITIONS

"**Birmingham Airport**" means the land outlined in red on Plan 1 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Birmingham Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

REVIEW

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

SERVICE/NOTIFICATION

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).

4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.Birminghamairport.co.uk/injunction.

    b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.

    c. Affixing a Warning Notice approximately at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy.

5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.

6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: https://www.Birminghamairport.co.uk/injunction.

9. The Court will provide sealed copies of this Order to the First Claimant's solicitors for service or notification (whose details are set out below).

FURTHER DIRECTIONS

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the First Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.

11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.

13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

14. No acknowledgment of service, admission or defence is required by any party until further so ordered.

15. Costs are reserved.

COMMUNICATIONS WITH THE FIRST CLAIMANT

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

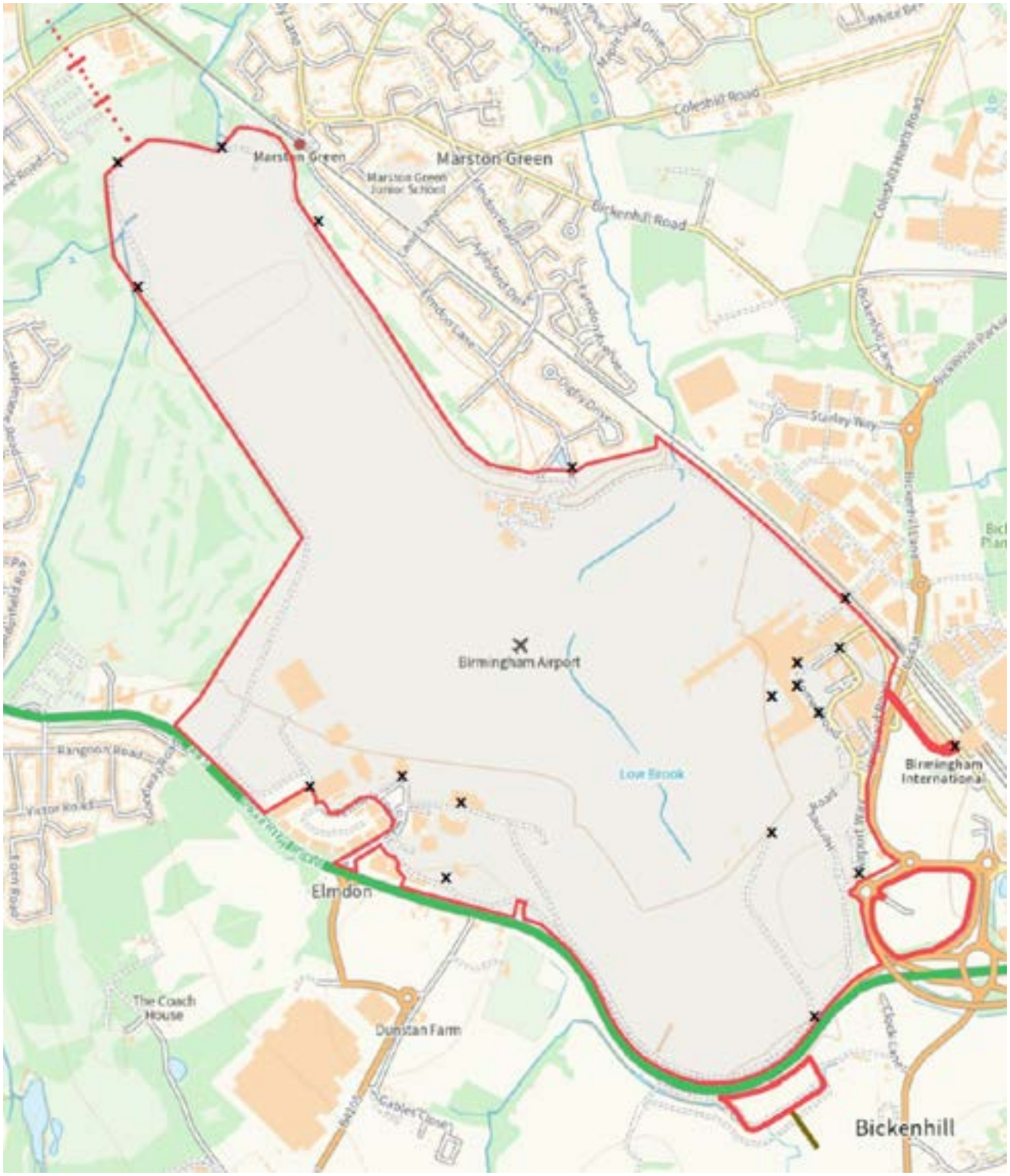
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at https://efile.cefile-app.com

SCHEDULE 1


Marston Green
Marston Green
Marston Green Junior School
Coleshill Road
Bickenhill Road
Stanley Way
Birmingham Airport
Love Brook
Birmingham International
Rangeley Road
Victor Roads
Elmdon
The Coach House
Dunstan Farm
Bickenhill

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 ("the Order")

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Birmingham Airport Limited (the "**First Claimant**")

This notice relates to the land known as Birmingham Airport which is shown edged red on the Plan below (the "**Airport**").

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

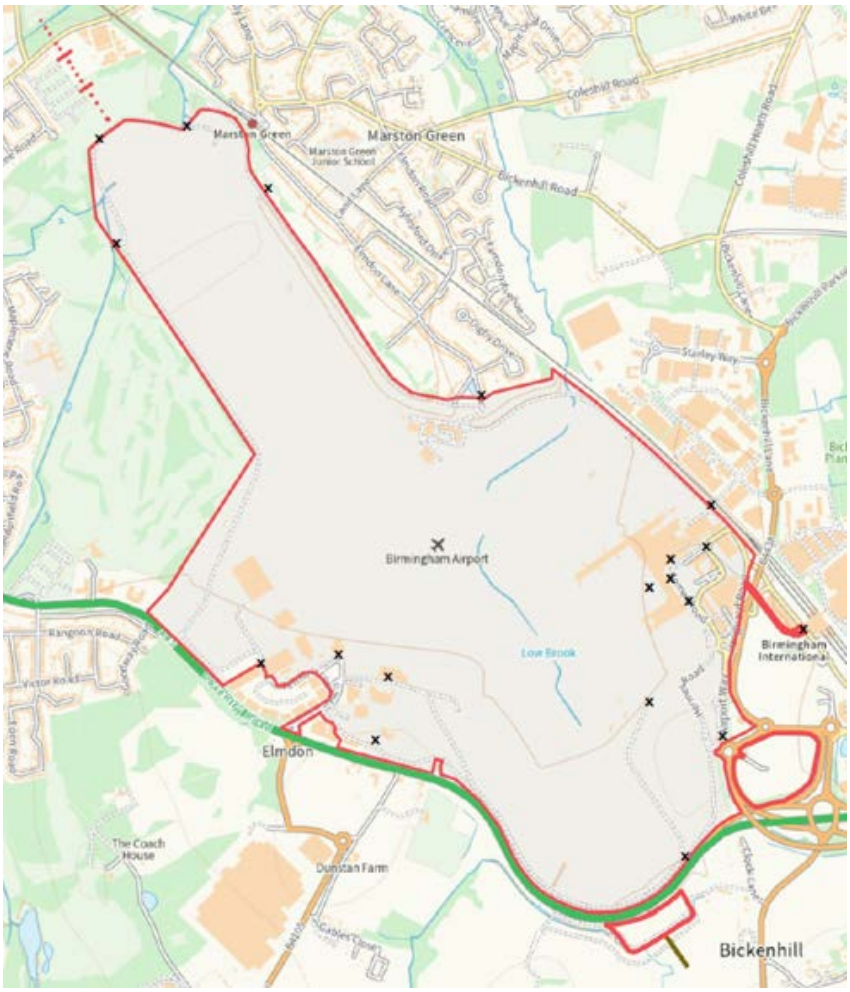
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at: https://www.Birminghamairport.co.uk/injunction

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BEFORE MR JUSTICE JACOBS

DATED 6TH AUGUST 2024

BETWEEN:



(1) BIRMINGHAM AIRPORT LIMITED

(2) LIVERPOOL AIRPORT LIMITED

(3) PEEL L&P INVESTMENTS (NORTH) LIMITED

(4) BRISTOL AIRPORT LIMITED

(5) SOUTH WEST AIRPORTS LIMITED

(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

-and-

PERSONS UNKNOWN

As more particularly described in the Amended Claim Form

Defendant

ORDER

Before The Honourable Mr Justice Jacobs sitting at the Royal Courts of Justice, the Strand, London on 6 August 2024

UPON the Claimants' claim by the Claim Form dated 31 July 2024

AND UPON the Claimants' application for injunctions dated 31 July 2024 ("**the Application**")

AND UPON READING the Application, the first witness statement of Nick Barton dated 31 July 2024, the first witness statement of John Irving dated 31 July 2024, the first witness statement of Graeme Gamble dated 31 July 2024, and the first witness statement of Stuart Wortley dated 1 August 2024 and the witness statement dated 6 August 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Mr Sibley for the Claimants and no one attending for the Defendants

AND UPON the Court granting the Claimants injunctions on 6 August 2024 in respect of the land shown outlined in red on Plans 1, 2 and 3 to the Amended Claim Form (the "**Orders**")

IT IS ORDERED THAT:

PERMISSION TO AMEND

1. To the extent required, the Claimants have permission to amend the Claim Form and Particulars of Claim as:

    a. To the description of the Defendants.

    b. To substitute a new plan 1 for Birmingham Airport.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2024-002473

BETWEEN

(1) BIRMINGHAM AIPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

And

PERSONS UNKNOWN
as more particularly described in the Amended Claim Form

Defendants

NOTE OF "WITHOUT NOTICE" HEARING BEFORE MR JUSTICE JACOBS LISTED FOR 6 AUGUST 2024 AT 10:30

The hearing commenced at 10:30 on 6 August 2024. Appearing for the Claimant, Tim Morshead KC ("TM") and Peter Sibley ("PS") before Mr Justice Jacobs ("J").

1. TM thanked J for taking the matter in the vacation, and referred to how Cs were among the last airports not to be protected by an injunction. He commented that the injunctions still seem to be effective, and confirmed that this was the reason these proceedings were suitable vacation business.

2. TM outlined his proposed course, namely addressing preliminary matters, outlining the relevant facts and matters concerning the airports and the title position, highlighting the evidence of the threat including sweeping up alternative remedies, then addressing the legal framework and finally by making submissions. Finally, TM proposed to take J through the draft orders.

3. J indicated that he had read the witness evidence, the skeleton, some plans, the Valero decision, the Wolverhampton decision (although some time ago), the Gatwick decision and various airport injunction cases on Westlaw.

4. J noted that the case was listed, and that there had therefore been some notice to some extent.

5. TM confirmed this but referred to the need to keep notice of the hearing to a minimum.

Preliminary matters

6. TM handed up the Heathrow airport order and hearing note, along with a short supplementary witness statement from Stuart Wortley dated 6 August 2024.

7. J took time to read the statement.

8. TM explained the 6 August 2024 Stuart Wortley statement concerned the 2012 Bristol Byelaws.

9. J confirmed that this was not central to the case, the point being that the fact that there are byelaws does not prevent an injunction from being ordered.

10. TM further explained that the 2012 byelaws leave open as a question of fact what constitutes the airport. Mr Gamble in his witness statement simply attaches a plan without expressing a view or making this clear.

11. TM also drew J's attention to Mr Wortley's first witness statement ("Wortley 1") at pg 215, where there are three mistaken names in paragraph 99.

12. TM then referred to paragraph 20 of the skeleton, and the fact that relief is sought without distinguishing between the areas Cs can directly claim trespass in relation to, and those let out or occupied by 3rd parties. TM referred to how in fact, in the City Airport injunction proceedings, this approach was not adopted and the third party areas were carved out. However, the City Airport approach has not been followed in other similar airport cases since.

13. J asked if the issue of third party areas arises in respect of all of the other injunctions.

14. TM confirmed that it did. He explained that an airport has a general power and responsibilities for the airport as a whole, but as a matter of commerciality it lets out large areas, where private organisations conduct their operations. There are lots of arrangements the details of which it is inappropriate to get involved with. The activity Cs are seeking to stop is of a character that if allowed to take place fluidly on third party areas it would undermine substantially the effectiveness of the relief in relation to the generality of the areas. Also, there is the threat of nuisance arising from protest on third party areas. There are accordingly, two proper jurisprudential bases to restrain protest on the third party areas.

Factual position and title

15. TM then made submissions on the airports and the factual position on the ground. He referred to Wortley 1 which describes the title position in detail at paragraphs 10 to 22, and appends the title documents at pages 219 to 528 of the hearing bundle. TM said it was appropriate to trust

the exercise done by the solicitors. He noted that the product for each airport is the "A" series of plans for each airport.

16. J asked if the plans were annexed to the Particulars of Claim.

17. TM confirmed this.

18. TM explained that the title number on the legend on the left hand side of the A series of plans corresponds to the areas indicated on the plan itself. The upshot is to show that C1, with reference to the plan on pg 61, is the owner and prima facie entitled to maintain an action in trespass in relation to the red line area, on plan 1, most conveniently found on the draft order at page 9 of the bundle. TM explained that one of the odd features is that none of the airports have simple arrangements for landing lights. It is a mixture of outright ownership, long occupation and sometimes on unregistered land. Even assuming no paper title in relation to this, nevertheless the areas are occupied by the equipment. Relief is needed for effective protection, and or to prevent nuisance.

19. TM referred to plan 2A on page 63 of the bundle for the position in relation to Liverpool, and to plan 3A at page 65 of the bundle for the position for Bristol.

20. TM then referred to the next stage of the exercise carried out with reference to the "B" series of plans. Wortley 1 at paragraphs 25 - 31 deals with this, and pg 62 of the bundle shows the plan for Birmingham. This plan shows the areas in some sense carved out as third party rights. The blue areas on the plan are where everything is let out to a third party. The green areas of the plan indicate areas, typically terminals, where things are more complicated; some of that area is still retained by Cs, other parts are let out.

21. TM referred to the Birmingham Air Rail link and platform and the fact that C1 has an agreement for lease in respect of this and C1 is in fact the occupier.

22. J commented that he could not see the landing lights on plan 1B.

23. TM responded that the northern lights are shown, and the southern lights are in the area shaded in brown. The Liverpool plan at pg 64 of the bundle adopted the same convention concerning blue and green land. Liverpool airport, unlike the other two, has within it public highways. Prima facie, the public has a right of protest on this. In respect of Bristol airport, the equivalent plan is on pg 66, where the same colouring convention is used.

24. TM noted that it has been possible for Bristol airport to drill down and provide more minute detail as to what is found at the green areas, at pages 67, 68, 69 of the hearing bunlde. The parts outlined in blue are those bits within the green zones let out or licenced to third parties.

25. TM then addressed notification of intention to seek relief – he referred to Wortley 1 at paragraphs 32 to 37 – the major tenants were given notice. It is improbable that relief if granted would cause harm to anyone not notified but the liberty to apply provision can be relied on.

Airports

26. TM then referred to the sensitive features of airports – with reference to the witness statement of Mr Barton, at paragraphs 31 - 48, the witness statement of Mr Irving, at paragraphs 35 - 37, and the witness statement of Mr Gamble at paragraphs 36 - 38. The witnesses for Liverpool and Bristol, Gamble and Irving, follow the lead of the Birmingham witness, Barton.

27. TM summarised the evidence. He noted that it is clear from the evidence, that airports have a special sensitivity and vulnerability owing to the sheer volume of human and other traffic participating in airport activities. There is the movement of vast, delicate and dangerous machines, proximity to toxic and dangerous materials, and zones of interest for counter terrorism. It is a high stress high activity environment where there is a premium on normal behaviour and a strong interest in keeping unexpected behaviour to a minimum. There is a heightened risk as protest may be used as a mask for terrorism, with reference to pg 91 of the hearing bundle.

28. TM also noted another feature of airports, which has required other orders in airport injunction cases to have included reference to what amounts to intention or purpose in the definition of the defendants. A particular feature of airports makes this unavoidable, as one is not dealing with sealed sites, e.g. oil terminals, but sites where the public are allowed (some) access. There is no other practical way of dealing with this than by referring in some way to intention or purpose.

29. J asked what was done in previous cases in relation to the purpose point.

30. TM referred to how a distinctive feature of the draft orders in this case is that they follow the orders of Ritchie J, where he used the word purpose. The draft orders in this case respect this direction of travel from the judiciary but the wording in the Claim Form does not reflect this. The Claim Form is to be amended to ensure alignment between the descriptions in the orders and the pleadings.

31. TM also referred to another area of interest about airports, namely the economic and potential chaos factor and cascade impact of disruption and delays. Economic impacts are significant as the daily turnover is around £750,000. Airports are an integral part of life and when the wheels come off, the consequences are felt widely, as is well known.

Threat and compelling need

32. TM then turned to the next section of his submissions, namely the threat posed and the compelling need for the injunction – addressed at paragraphs 38 – 85 of Wortley 1. This sets out the history of JSO and provides a summary from 2022 onwards. The focus was on oil terminals, noting a shift in emphasis towards airports. TM quoted from an extract starting at pg 580 of the hearing bundle; a JSO post from 13 September 2023. TM noted that this was the start of a shift away from a focus on the oil industry and an admission that an injunction is an effective instrument. TM then referred to an article on pg 590 and 591 of the bundle being an article from the Mail Online relating to an undercover journalist from the Mail Online discovering JSO's airport plans. TM then referred to JSO coming clean about their airport plans following the Mail Online article at pg 604 of the bundle.

33. J commented that this was really as a result of the Mail Online exposure of their plans.

34. TM then referred to paragraphs 71 – 80 of Wortley 1 which describes, to the extent to which he is aware, that JSO's plan has materialised. TM referred to incidents on 2 June at Farnborough, 20 June at Stansted, 25 June at Gatwick, 27 June, 24 July at Heathrow, 29 July at Gatwick, and 30 July at Heathrow. This shows the threat specifically and on a sustained basis by campaigners. Wortley 1 describes other injunctions obtained by airports at paragraph 89.

35. J asked how similar the draft orders in this case were to the injunction order in Gatwick.

36. TM responded that Cs have laboured to align the relief sought in this case with what was granted by Ritchie J in Gatwick, which is the most refined order made in relation to airport protest injunctions.

37. One nuance noted by Ritchie J was in respect of the Gatwick railway station. Ritchie J was alive to people arriving at the rail station and not realising they were affected by the injunction, and so carved out the railway station. This had not been done here as C1 is in occupation of the whole of the railway station. TM noted that J might decide in this case that he should apply the injunction only outside of the precincts of the railway.

38. J asked why. He asked if this would be because would be protestors might not know of the injunction when stepping off a train.

39. TM responded that Ritchie J's nervousness was as a result of people getting off the train who might not have seen the notice. Ritchie J wanted to be clear of the moment beyond which someone cannot plausibly say they did not understand what they were told not to do.

40. TM commented that Wortley 1 explains injunctions granted previously appear to have been effective. This was evidenced by the September 23 admission by JSO and, as noted in Wortley

1, a protest scheduled for City airport on 27 July shifted to central London following the obtaining of an injunction.

Effectiveness of injunctions

41. J asked why injunctions are more effective than the general law.

42. TM ventured a guess, that some are willing to take their chances in front of a magistrate or jury, but are not willing to take their changes in front of a judge.

43. TM referred to the photo evidence at page 650 of the hearing bundle. He explained that this was the law working as it should. The general law may in these cases be treated without respect by the protestors that one would wish for. But at the moment, the principle that the courts are authoritative is as it should be, and is recognised as a sign that the activity which is enjoined must not happen. There cannot be a guarantee that there will be no breaches, but perfection must not be the enemy of the good.

Alternative remedies

44. TM noted that Cs are required by the Supreme Court in the Wolverhampton decision to have regard to alternative remedies, including Byelaws and the general law. The story is that the general law is not enough. It is part of the program of the protestors to risk arrest. Cs armed with an injunction have more control over the process than when enforcement is left to public authorities. The potential for delay is reduced with breach of injunctions. With Byelaws, the available sentences are generally modest with a maximum fine of £2500.

45. New offences are now on the statute book. Mr Hallam has now been sentenced to 5 years in prison. Once that sinks in the general law may have a greater deterrent effect.

46. J asked what Mr Hallam had been sentenced for, i.e. under what statute.

47. TM replied that it was a public order offence.

48. TM further commented that 5 years is a very long sentence, and it is possible that it will have a deterrent effect in the future, but that is not felt yet. Ritchie J in the Gatwick case noted that this was something to be assessed when the injunction is on for review. At the moment, there is no evidence that the general law is causing protests to abate. The answer to the requirement to consider alternative remedies, is that as matters stand, the evidence suggests that injunctions are doing what the general law cannot do. It is hoped that it will change but at the moment that is the position.

Legal Framework

49. TM then addressed the legal framework. As indicated in the Valero decision, Ritchie J's judgment is written on the basis that this is an emerging jurisdiction. No decision has a concrete description or prescribed set of questions. The court still has a part to play in working out the right response.

50. TM referred to the Wolverhampton decision at paragraph 167 where the court sets out the conclusions at that stage about the nature of the jurisdiction. TM submitted that the key controlling characteristic is compelling need. This is the key thing that attracts the eye of equity.

51. TM noted that the Supreme Court emphasised that this jurisdiction is at an early stage at para 185. He referred to paragraphs 222 and 224 of Wolverhampton where the Supreme Court dealt with the principle of the court enjoining lawful activity.

52. Then TM referred to paragraphs 225 - 226 where the Supreme Court dealt with the fact that the Supreme Court was dealing with traveller rather than protest cases.

53. TM then referred to the decision in Cuadrilla at paragraph 50.

54. TM then referred to the synthesis of the principles in Valero at paragraphs 57 to 58, a synthesis between the principles in Wolverhampton and established practice. He referred to the checklist but confirming that this is not the be all and end all.

55. TM also referred to paragraph 66 of Valero in relation to Articles 10 and 11. He submitted that Cs say the balancing exercise does not really fall to be applied in respect of the public highways in Liverpool, the only airport with public highway. TM invited the judge, if inclined to conduct the balancing exercise, to adopt Ritchie J's approach at paragraph 66 of Valero.

56. J asked if the highway point had arisen in other Airport cases.

57. TM responded that Leeds airport was an example.

Submissions

58. TM submitted that the court has the material before it from which to make an order.

59. TM referred to how if the protestors were present, they would likely invoke their strongly held beliefs, and an argument based on the convention.

60. TM referred in this regard to Ritchie J in Valero at para 66. Furthermore, he referred to the principle that the public has no right to be on private land except for purpose of the land owner's consent.



Note of judgment

61. J held that he was prepared to grant an injunction. This case is materially the same as other airport injunction cases and even if he is not strictly bound by those other cases, he ought to afford respect to those other cases and other decisions as a matter of precedent, unless there is some material point of distinction. J was of the view that the reasoning of Ritchie J is sufficient to persuade him to grant an injunction. J held that he did not need to find anything more. He noted that he has been taken through the law and tests and is satisfied on the main points of ownership, features of airports, the compelling need and that there is no substantial defence to be advanced. Ultimately following what has been said by Ritchie J, after giving careful consideration J considered it appropriate to grant an injunction.

62. TM commended this approach, and noted the danger of reinventing the wheel.

Order

63. J reviewed the draft orders against the order from the Gatwick decision at pg 728 of the hearing bundle.

64. TM commented that the descriptions of the defendants should be the same as in Gatwick with suitable amendments.

65. J considered that the shorter definition of "Warning Notice" in the Gatwick order should be used.

66. J queried whether there needed to be any carve out for the train station at Birmingham airport.

67. TM proposed inserting a new plan to the Birmingham airport order to address this point.

68. TM noted that paragraph 2 of the draft order should be amended in line with the Drax injunction order to include procedural machinery for the review hearing.

69. J noted that the draft order by paragraph 3 dispensed with service but referred to service in subsequent paragraphs.

70. TM referred to the nuance following Wolverhampton about how in these sui generis types of injunction cases, there is "notification" rather than service.

71. J proposed changing the "service and notification" wording in the draft order to "service or notification" to deal with this issue.

72. J proposed in respect of paragraph 11 of the draft order that reference to email service on Mr Hallam should be removed as he has been sentenced to 5 years in prison.

73. TM noted that although the points discussed were discussed in respect of Birmingham airport, save for the rail way station point, the same issues would apply to the other draft orders.

74. TM noted an issue common to all, namely that undertaking 1 in schedule 2 was duplicated in the body of the order and should be removed.

There was then a 15 minute adjournment between 12:15 and 12:30.

75. TM showed the judge an amended plan for Birmingham airport adjusting the red line boundary of the injunction around the railway station.

76. J approved this.

77. J asked for draft orders to be emailed to his clerk in red line and in final “clean” form.

The hearing concluded at 12:40.

N244

Application notice

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

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

Name of court **The High Court of Justice** **King's Bench Division**	**Claim no.** **KB-2024-2473**
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
	H W F - - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Birmingham Airport Ltd and others	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	2 June 2025 02 Jun 2025

HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
KB-2024-002473

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

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

   If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?
   1. To list a hearing (time estimate 1 day) to review the injunction made by orders of Jacobs J dated 6 August 2024 on 20 June 2025 or as close to that date as is convenient for the Court.

   2. To consolidate the claim under CPR rule 3.1(2)(h), alternatively case manage and hear it under rule 3.2(i) and/or (p) with the following claims:
   (a) London City Airport Ltd and ors v PU - claim no KB-2024-001765;
   (b) Manchester Airport Plc and ors v PU - claim no KB-2024-002132; and
   (c) Leeds Bradford Airport Ltd and ors v PU - claim no KB-2024-002317 ("**the Other Airports Claims**").

4. Have you attached a draft of the order you are applying for? ☒ Yes ☐ No

5. How do you want to have this application dealt with? ☐ at a hearing ☒ without a hearing
   ☐ at a remote hearing

6. How long do you think the hearing will last? ☐ Hours ☐ Minutes
   Is this time estimate agreed by all parties? ☐ Yes ☐ No

7. Give details of any fixed trial date or period — N/A

8. What level of Judge does your hearing need? — High Court Judge

9. Who should be served with this application?

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

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

☐ the attached witness statement

☐ the statement of case

☒ the evidence set out in the box below

If necessary, please continue on a separate sheet.

1. The orders of Jacobs J are attached, together with the orders made by:-

   (a) Julian Knowles J dated 20 June 2024 made in claim no KB-2024-001765;

   (b) Her Honour Judge Coe KC dated 5 July 2024 made in claim no KB-2024-002132; and

   (c) Ritchie J dated 18 July 2024 made in claim no KB-2024-002317 (as amended pursuant to the slip rule on 19 and 21 July 2024).

The review hearing

2. Paragraph 2 of the Orders of Jacobs J in the instant case provide for those Orders to be reviewed "… annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of $2^1/_2$ hours".

3. The Claimants invite the Court to list the review hearing pursuant to paragraph 2 of that order on 20 June 2025 or as soon as is convenient thereafter.

Consolidation / case management with the Other Airports Claims

4. All of the injunctions granted in the Other Airports Claims are subject to review at 12 month intervals and the Claimants in those cases also seek review of the injunctions and have, by Eversheds Sutherland (International) LLP also made applications of even date to this application (and also for consolidation or case management with this case and the Other Airports Claims.

5. In those cases:-

   (a) Paragraph 3 of the Order of Julian Knowles J made in claim number KB-2024-001765 provides for a time estimate of 1.5 hours for the hearing of the review application made in that claim.

   (b) No time estimate is provided in the Orders of HHJ Coe KC or Ritchie J. However, it is anticipated that a similar time estimate would be required.

6. In view of the similarity of factual and legal issues in this claim and the Other Airports Claims, it would be beneficial for the claims to be consolidated, alternatively case managed and heard together, in order to determine the cases in accordance with the overriding objective and in specific to (a) minimise the demands placed on the court resources by a multiplicity of hearings which would require more than a day of court time; and (b) avoid the risk of inconsistent decisions.

7. The Court is invited to make an order on the papers in the form of the draft order. The Claimants will notify the Defendants of any order made by the Court and the application following the making of the order.

☐☐☐

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

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

☒ No

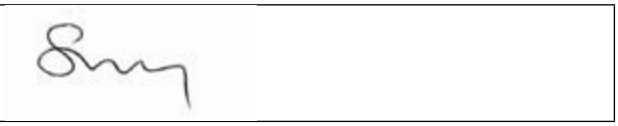
Statement of Truth

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

☒ **I believe** that the facts stated in section 10 (and any continuation sheets) are true.

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

Signature



☐ Applicant

☐ Litigation friend (where applicant is a child or a Protected Party)

☒ Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
2	June	2025

Full name

Stuart Sherbrooke Wortley

Name of applicant's legal representative's firm

Eversheds Sutherland (International) LLP

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

Partner

Applicant's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Greater London

Postcode

E	C	2	V	7	W	S

If applicable

Phone number

0771 288 1393

Fax phone number

DX number

Your Ref.

SSW

Email

stuartwortley@eversheds-sutherland.com

Party: *Claimants*
Name: *S S Wortley*
Number: *Third*
Date: *06.06.25*
Exhibits: *"SSW15" – "SSW20"*

CLAIM NO: KB-2024-2473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

I STUART SHERBROOKE WORTLEY of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a partner in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants.

2. On 06.08.24, Mr Justice Jacobs granted injunctions to restrain the Defendants from entering, occupying or remaining on Birmingham Airport, Bristol Airport and Liverpool Airport (as defined in those Orders) until varied, discharged or extended by further order.

3. Paragraph 2 of the Orders provided for each of those injunctions to be reviewed by the Court on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2.5 hours and permitted the Claimants to file and serve any evidence in support 14 days before the review hearing.

4. I make this witness statement for the purposes of the review hearing which has been listed on 24.06.25.

2024 Airport Injunctions

5. Between 20 June and 14 August 2024, the following injunctions were granted to protect airports against environmental protestors opposed to the use of fossil fuels.

	Airport	**Action Number**	**Judge / Date of Order**
1	London City Airport	KB-2024-001765	Mr Justice Julian Knowles 20 June 2024
2	Manchester Airport Stansted Airport East Midlands Airport	KB-2024-002132	HHJ Rosalind Coe 5 July 2024
3	Heathrow Airport	KB-2024-002210	Mr Justice Julian Knowles 10 July 2024
4	Leeds Bradford Airport Luton Airport Newcastle Airport	KB-2024-002317	Mr Justice Ritchie 18 July 2024
5	Gatwick Airport	KB-2024-002336	Mr Justice Ritchie 19 July 2024
6	Birmingham Airport Bristol Airport Liverpool Airport	KB-2024-002473	Mr Justice Jacobs 6 August 2024
7	Southend Airport	KB-2024-002596	Mrs Justice Farbey 14 August 2024

6. Last year it was possible to achieve a certain amount of co-ordination with a view to saving costs and limiting the demands placed by these matters on Court resources, in that my firm acted in 4 out of the 7 actions listed above (numbers 1, 2, 4 and 6). However, our instructions arrived over time rather than all at once, and so multiple hearings were needed, despite the common ground between the different matters.

7. Although the precise terms of the Orders vary slightly, each of the injunctions granted in actions 1, 2, 4 and 6 in the table effectively provides for an annual review.

8. This year, therefore, there is the potential to achieve better co-ordination with a better use of the Court's time: Birmingham, Liverpool and Bristol Airports and the 7 other airports involved in actions 1, 2 and 4 have decided to join together and to ask the Court to undertake the annual review at the same hearing. I was not instructed in relation to the other airports last year (Heathrow, Gatwick and Southend): I believe they remain represented by other firms of solicitors. I understand that the solicitors for Heathrow and Southend Airports have arranged a review hearing sometime next month.

9. As noted above, the Order in this action provided for a review hearing of 2.5 hours duration. The Order in action 1 provided for a review hearing of 1.5 hours duration. The Orders in actions 2 and 4 did not specify a time estimate for the review hearing. The Court has now listed the review hearings in all 4 actions together, with a time estimate of 1 day on 24 June 2025.

10. I make this witness statement in support of the review of the London City Airport injunction. I will be repeating or adopting much of the content of this witness statement in my statements in support of the annual reviews of the injunctions granted in the other actions.

Service of the Order dated 06.08.24

11. Each of the documents required to be served by the Orders dated 06.08.24 was served in accordance with paragraph 4. In each case the last step took place on 09.08.24 @ 10:48 when I sent an email message to the 4 email addresses referred to in Schedule 3 to the Orders.

The Plans

12. The injunctions granted in this action and in actions 2 and 4 in the table above and were based on the relevant airport byelaws (and therefore extend to all of the land which is subject to the Byelaws including land over which the Claimant would not be entitled to legal possession – including for example highways land and areas which are demised to third parties).

13. The injunctions in this case extend to the land edged red on Plan 1 (Birmingham Airport), Plan 2 (Liverpool John Lennon Airport) and Plan 3 (Bristol Airport).

14. I am informed by Kristen Garrett, General Counsel for Birmingham Airport that there have been no changes to the Birmingham Airport Byelaws 2021 and that the Plan attached to the Birmingham Airport Order dated 06.08.24 remains accurate.

15. I am informed by John Irving, Chief Executive Officer of Liverpool John Lennon Airport that there have been no changes to the Liverpool John Lennon Airport Byelaws 2022 and that the Plan 2 attached to the Liverpool John Lennon Airport Order dated 06.08.24 remains accurate.

16. I am informed by Graeme Gamble, Chief Operating Officer of Bristol Airport that there have been no changes to the Bristol Airport Byelaws 2012 and that the Plan attached to the Bristol Airport Order dated 06.08.24 therefore remains accurate.

UK Airport Protests

17. The table below records a summary of the protests against UK airports which took place in June – August 2024. It also includes a summary of the arrests, convictions and subsequent sentencing and other relevant incidents occurring after August 2024.

02.06.24	Extinction Rebellion conducted a protest at Farnborough Air Show which involved blocking the 3 main gates and parking the Extinction Rebellion pink boat across the Gulfstream gate
20.06.24	Two JSO activists sprayed 2 aircraft at London Stanstead Airport with orange paint after cutting through the perimeter fence at around 5.00 am
25.06.24	Four JSO activists were arrested at Gatwick Airport railway station equipped with suitcases containing bandages (suspected to have been

	intended to force the airport to close owing to the risk of damage to aircraft engines in the event of them being released near aircraft)
27.06.24	Six JSO activists were arrested at a meeting in London pursuant to powers in the Public Order Act 2023
19.07.24	Roger Hallam (along with four other JSO activists) had been found guilty of conspiring to organise protests to block the M25 motorway in November 2022 Mr Hallam was sentenced to 5 years imprisonment and each of the others were sentenced to 4 years imprisonment (reduced by the Court of Appeal on 07.03.25 – see below)
24.07.24	Ten JSO activists were arrested at Heathrow Airport as part of an intelligence led operation - some were equipped with cutting gear and glue
27.07.24	A protest which was due to be held at London City Airport was relocated to the Department of Transport on Horseferry Lane
29.07.24	Eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure
30.07.24	Two JSO activists were arrested at Heathrow Airport after spraying orange paint around the Terminal 5 entrance hall and on the destination boards in the departure lounge
31.07.24	A protest by JSO and Fossil Free London was held at the Docklands Light Railway station at City Airport JSO and Fossil Free London both uploaded photographs of the protest with the following message:- *"We've been served with an injunction which means even walking out of the wrong exit of this station could get us arrested."*
01.08.24	Six JSO activists blocked access to the departure gates at Heathrow Terminal 5
05.08.24	Five JSO activists were arrested on their way to Manchester Airport equipped with bolt cutters, angle grinders, glue, sand and banners carrying slogans including "oil kills".
16.01.25	The trial of the two JSO activists arrested at Heathrow Airport on 30.07.24 resulted in a hung jury
02.02.25	Extinction Rebellion held a demonstration at Farnborough Airport following a consultation period in relation to Farnborough Airport's expansion plans which ended in October 2024
17.02.25	Extinction Rebellion held a demonstration at Inverness Airport waving banners with *"Ban Private Jets"* and *"We're in a climate emergency, we need to step up and take action"*

21.02.25	Of the five JSO activists arrested on their way to Manchester Airport on 05.08.24, four were found guilty of conspiracy to commit a public nuisance and one was acquitted with sentencing adjourned to 23.05.25
07.03.25	The Court of Appeal delivered judgment in a conjoined appeal by sixteen JSO activists against sentencing Two of the sentences passed on 19.07.24 were reduced by 18 months (from 4 years to 30 months), the other three were reduced by a year (from 5 to 4 years in Roger Hallam's case and from 4 to 3 years in the other two) Of the other eleven appeals, one was reduced by 2 months but the other ten appeals were dismissed
20.03.25	Of the ten JSO activists arrested at Heathrow Airport on 24.07.24, nine were found guilty of conspiracy to cause a public nuisance at Heathrow Airport with sentencing adjourned to 16.05.25
27.03.25	Just Stop Oil announced the end of their campaign (see below)
27.03.25	On the same day as the JSO announcement, Youth Demand held a meeting to discuss issues including the climate crisis and a fresh wave of civil resistance in London in the Westminster Quaker Meeting House Six individuals were arrested
27.04.25	Youth Demand activists threw bright pink powder over elite runners participating in the London marathon as they crossed Tower Bridge The individuals taking part wore T-shirts that read "Youth Demand – Stop Arming Israel" – which appears to be their primary cause
16.05.25	Of the nine individuals convicted on 20.03.25, five were sentenced to terms of imprisonment of up to 15 months and four were given suspended sentences
27.05.25	Each of the four individuals convicted on 21.02.25 was sentenced to a term of imprisonment of between 18 and 30 months

18. Copies of media articles relating to the events recorded in this table are attached to this statement marked **"SSW15"**.

19. A copy of the Court of Appeal decision handed down on 07.03.25 is attached at **"SSW16"**.

20. The fact that the protest on 27.07.24 was relocated from London City Airport to the Department of Transport and the fact that the JSO and Fossil Free London protestors conducted their protest from outside the red line of the injunction plan demonstrate that the injunction granted by Mr Justice Julian Knowles in that case on 20.06.24

served its purpose. In both instances peaceful protests were went ahead but without causing unlawful interference to users of London City Airport.

27.03.25 – JSO Announcement

21. As noted in the chronology above, on 27.03.25, Just Stop Oil made the following announcement:-

> *"Three years after bursting on the scene in a blaze of orange, at the end of April we will be hanging up the hi vis.*
>
> *Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful.*
>
> *So it is the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison. We have exposed the corruption at the heart of our legal system, which protects those causing death and destruction while prosecuting those seeking to minimize harm. Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK's oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen.*
>
> *This is not the end of civil resistance. Governments everywhere are retreating from doing what is needed to protect us from the consequences of unchecked fossil fuel burning. As we head towards 2°C of global heating by the 2030s, the science is clear: billions of people will have to move or die and the global economy is going to collapse. This is unavoidable. We have been betrayed by a morally bankrupt political class.*
>
> *As corporations and billionaires corrupt political systems across the world, we need a different approach. We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Nothing short of a revolution is going to protect us from the coming storms.*
>
> *We are calling on everyone who wants to be a part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. Sign up here. See you on the streets.*
>
> *ENDS"*

22. Copies of media articles relating to this announcement and to the "final" JSO protest which took place in central London on 26.04.25 are attached marked **"SSW17"**.

18.05.25 - We are "plotting a very big comeback"

23. Whilst the announcement referred to above suggests that the risk of unlawful protests at UK airports has reduced, on 18.05.25 the following story appeared on GB News (both on television and on-line):-

> *"Now, I was getting pretty bored of the juvenile antics at the altar of climate change.*
>
> *We've seen it all vandals throwing soup over priceless artworks in galleries, defacing Stonehenge, ambushing theatre productions in the West End, blocking traffic, scaling motorway gantries, dousing private jets in paint, and even disrupting sports events all just to spoil the fun for everyone else.*
>
> *Remember them? They said they were disbanding after the government appeared to adopt their demand to end new oil and gas licences in Britain. Their actions, of course, cost the public tens of millions in police and court time.*
>
> *But despite Ed Miliband bowing to their demands, I can exclusively reveal that Just Stop Oil is plotting a very big comeback.*
>
> *On Ben Leo Tonight, we have gained access to secret Just Stop Oil meetings, where members are discussing a dramatic U-turn—planning to cause chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and even carrying out "citizens' arrests" on so-called climate criminals.*
>
> *Speaking during an online meeting on Thursday night, one coordinator—known only as "Dave"—said protests should remain "action-based" and warned against becoming more peaceful, like Greenpeace.*
>
> *The meeting continued with Dave insisting that it was essential to keep doing what he called the "spicy and naughty stuff" to generate media attention.*
>
> *The group also discussed how to feed new protest ideas back to what they referred to as a "core team". There was frustration over communication with this mysterious leadership group, with some suggesting using 50-word briefs to make it easier for them to process ideas.*
>
> *It raises serious questions: Who exactly is this core team? Who are these professional protesters reporting to—and who's funding them?*
>
> *Chillingly, the group also spoke about carrying out citizen's arrests on so-called climate deniers. There was some introspection as well, with members questioning whether their public image was doing more harm than good.*
>
> *But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to*

proceed with Just Stop Oil's revival, including talk of keeping protesters in safe houses to maintain morale.

Let's be clear: what we're dealing with here is a group of climate zealots plotting to commit criminal acts, backed by who knows what kind of funding, and being housed like some kind of eco-mafia.

And speaking of coordination—let's not pretend the climate agenda is a spontaneous grassroots movement. It's organised. It's funded. It's political.

So, who's paying to bus these protesters from London to Stonehenge, to airports, to art galleries and sports stadiums? Who's funding the Just Stop Oil safe houses where these scruffy, self-righteous agitators meticulously plan how to make Britain colder and poorer?

The police and the government must crack down on Just Stop Oil's plans for criminality before they gain traction again.

The last thing Britain needs is more disruption, more vandalism, and more self-indulgent eco-activism especially when a Labour government is already happily marching to the drumbeat of Net Zero extremism.

We'll be passing our findings to the police."

24. For my part, I acknowledge the possibility that this is tainted by sensationalism. However, JSO did not take efforts to repudiate what had been alleged. Instead, on 21.05.25, JSO circulated a link to the GB News story in a message to subscribers together the following comment:-

> *"GB News was right for once. We are "plotting a very big comeback".*

25. Copies of the GB News story and the JSO message to subscribers are attached to this message marked **"SSW18"**.

Other Environmental / Climate Campaign Groups

26. There are other protest groups who are opposed to the use of fossil fuels including for example, Youth Demand (the junior branch of JSO formerly known as Youth Climate Swarm), Extinction Rebellion and Fossil Free London.

27. Extinction Rebellion ("XR") remains an active organisation both in the UK and internationally:-

27.1. on 07.09.24, XR activists chained themselves to the gates of the Rijksmuseum in Amsterdam in an attempt to force the museum to sever ties with ING Bank;

27.2. on 25.09.24, XR activists covered the Finnish Parliament House with red paint;

27.3. on 23.05.25, XR activists held a climate protest against Total Energies and its partners – including the occupation of BNP Paribas' offices in Paris.

28. Fossil Free London is another protest group involved in direct action. Their website includes videos which promote the right protest and training videos relating to direct action.

29. A relatively new organisation which is campaigning against the fossil fuel industry is "shut the system". In January 2025, this group cut fibre optic cables to Lloyds of London and prominent buildings involved in the insurance sector on Fenchurch Street, Threadneedle Street, Leadenhall Street and Lime Street in London (and in Birmingham, Leeds and Sheffield).

30. An article concerning this story is attached to this statement marked **"SSW19"**.

Police Advice

31. On 21.05.25, the Metropolitan Police sent an email to the security team at London City Airport which included the following:-

> *" … the injunction at HAL [Heathrow Airport Limited] had a real impact on the Shell protest yesterday and builds on your experiences. To remove an injunction now would open up to further protest and whilst JSO have stepped down there appears to be a cycle of new groups emerging and this cannot be ruled out so maintaining it would be very much recommended."*

32. I believe the reference to *"… the Shell protest …"* relates to the Annual General Meeting of Shell plc held at the Soffitel Hotel at Heathrow Terminal 5 on 20.05.25. The Metropolitan Police told London City Airport's security team that a protest by environmental protest groups:-

> "*were forced to hold their protest at the Shell head office in central London rather than the AGM location at a hotel within the Heathrow Airport injuncted area, in order to avoid the risk of associated penalties for breaching of the injunction*."

33. I believe the references to *"… your experiences …"* is a reference to the events referred to in paragraph 19 above – including the fact that one of the protests due to take place at London City Airport was relocated to the Department of Transport.

34. A copy of the email (from which I have redacted personal information) is attached to this statement marked **"SSW20"**.

Conclusion

35. I am informed by Kristin Garrett, John Irving and Mark Hunt and believe the Claimants' directors have concluded that they should ask the Court to extend the injunction for a further 12 months from June 2025. I understand that they reached this decision after having considered carefully whether the threat which was clearly present last year has abated materially, especially in light of the JSO announcement in March.

36. Obviously, the question of whether the injunction has outlasted its need, is one for the judgment of the Court. However, based on the material to which I have referred, the Claimants (and, for what it is worth, I also) consider that there remains a compelling need for the injunction to remain in place. Climate change remains firmly on the political agenda. It continues to attract strong feelings and is still a subject about which campaigners are willing to contemplate disruptive action. The inference drawn by the Claimants (and by me) is that the injunctions granted over time have influenced the pattern of protest, which disruptive action being focused principally on targets which do not have the benefit of the Court's protection by way of injunction. The Claimants (and I) consider that the risk remains high that airports generally, including theirs, would come back into focus, if the injunction were now to be lifted. JSO's seeming change of heart in March 2025 was not adopted by all other campaign groups; and even as a statement of JSO's position, later events have shown that it was not an immutable repudiation of disruptive protest. The Claimants (and I) cannot discount the possibility, that JSO's March 2025 announcement may have been partly tactical: to make renewal of the injunctions harder — and disruptive protest at the airports correspondingly less risky. The risks are especially acute at this time of year: most of the incidents in which UK airports were targeted by environmental protestors in 2024 occurred between late June and August 2024 - the busiest period for holiday travel.

Notice of the Review Hearing

37. The Claimants intend to give notice of the review hearing in the manner provided for in para 4 of Order dated 06.08.24 – namely by:-

37.1. Uploading a copy of the application dated 02.06.25, the draft Order, a copy of this witness statement and exhibits and details of the review hearing to each of the injunction websites;

37.2. sending copies of the documents referred to in the previous paragraph to the email addresses referred to in Schedule 3 to the Order dated 18.07.24 plus the following additional email addresses (noting that "Shut The System" does not operate a website and although "Fossil Free London" does have a website, this does not include an email address):-
YouthDemandPress@protonmail.com

37.3. affixing a notice at each of the warning notice locations at each airport referring to the time and date of the review hearing and explaining where copies of the additional papers can be found and obtained in hard copy.

I believe that the facts stated in this Witness Statement and Exhibits are true.

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

I am duly authorised to make this statement on behalf of the Claimants.



Stuart Sherbrooke Wortley

6 June 2025

Party: *Claimants*
Name: *S S Wortley*
Date: *16.06.25*
Exhibits: *"SSWA" and "SSWB"*

CLAIM NO: KB-2024-1765

CLAIM NO: KB-2024-2132

CLAIM NO: KB-2024-2317

CLAIM NO: KB-2024-2473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

VARIOUS AIRPORTS
AS MORE PARTICULARLY DESCRIBED
IN THE (AMENDED) CLAIM FORMS

Claimants

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE (AMENDED) CLAIM FORMS

Defendants

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

I STUART SHERBROOKE WORTLEY of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a partner in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants.

2. I make this witness statement in support of the June 2025 review hearings in each of the 4 actions (action numbers given above) which have been listed for hearing on 24.06.25.

Service of Evidence for Review Hearings

3. In each of these actions, it was necessary for the Claimants to serve the evidence in support of the review hearing by:-

   3.1. uploading the material to the relevant airport injunction website; and

   3.2. sending the material to the email addresses specified in the injunction Order.

4. In each of the actions (save for KB-2025-2473 which relates to Birmingham, Liverpool John Lennon and Bristol Airports) it was also necessary to affix notice of the review hearing (stating where documents can be found) at each of the relevant airport injunction warning notice locations (identified "X" on the relevant injunction plan). Whilst this was not a requirement of the Order in action number KB-2025-2473, in the interests of adopting a consistent approach my firm arranged for notices to be affixed to the warning notices at those Airports too.

5. Although the orders in action numbers KB-2025-2132 (Manchester, London Stansted and East Midlands Airports) and KB-2025-2317 (Leeds Bradford, London Luton and Newcastle International Airports) included provision for further applications and evidence to be served on the Defendants by alternative means, they did not set any time limit for doing so.

6. Each of the 4 orders provided that effective service would be given once the last step was completed. In each case, all steps were completed on Monday 09.06.25.

7. At each Airport (save for Birmingham Airport), the last step was my email message to the relevant email addresses, the time of which I have included in the table below. In the case of Birmingham Airport, the last step was the affixing of the notices (a step which the Order did not expressly require).

Airport	**Last Step**	**Date / Time**
London City	Email message	09.06.25 @ 18:47
Manchester	Email message	09.06.25 @ 19:03
London Stansted		
East Midlands		
Leeds Bradford	Email message	09.06.25 @ 19:04
London Luton		
Newcastle International		

Birmingham	Warning notice	09.06.25 @ 19:23
Liverpool John Lennon	Email message	09.06.25 @ 18:48
Bristol	Email message	

Filing of Evidence for Review Hearings

8. The orders in action numbers KB-2025-1765 (London City Airport) and KB-2025-2473 (Birmingham, Liverpool John Lennon and Bristol Airports) provided for evidence in support of the review hearing to be filed 14 days before the review hearing.

9. The orders in action numbers KB-2025-2132 (Manchester, London Stansted and East Midlands Airports) and KB-2025-2317 (Leeds Bradford, London Luton and Newcastle Airports) did not provide for the evidence to be filed at all.

10. In preparing this witness statement, I have noted that I have overlooked the need to file the further evidence in 2 of the actions (for which I apologise). That has been corrected today. My statements in all 4 actions has been filed.

No Named Defendants / Notice of Review Hearing to Third Parties

11. The following representative of each Airport has confirm that:-

    11.1. they do not know the name of an individual who threatens to protest at the Airport; and

    11.2. they will take steps to inform tenants and licensees of the review hearing on 24.06.25.

Airport	**Representative**
London City	Claire Hortop, Head of Legal
Manchester	David McBride, Head of Legal (Airports)
London Stansted	
East Midlands	
Leeds Bradford	Kunaal Wharfe, General Counsel
London Luton	David Morris, Head of Legal
Newcastle International	Mark Hunt, Chief Financial Officer
Birmingham	Kristin Garrett, General Counsel
Liverpool John Lennon	John Irving, Chief Executive Officer
Bristol	Graeme Gamble, Chief Operating Officer

Just Stop Oil – 2025 Training Programme

12. During the weekend of 14/15 June 2025, Just Stop Oil arranged an event branded "Seeds of Rebellion" which refers to a "six-week training programme" including Phoebe Plummer (referenced in my previous witness statement) as a guest speaker. A copy of an email message promoting this event is attached to this statement marked **"SSWA"**.

13. Since preparing my last witness statements in each of these 4 actions dated 06.06.25, my attention has been directed to the fundraising pages of the Just Stop Oil website. This also suggests that the Just Stop Oil campaign is a continuing campaign notwithstanding the announcement made in March 2025. The "Donate" page invites supporters to make monthly donations of between £4.00 and £50.00 with an announcement:-

> *"A new campaign is in the works – one that builds on our success as Just Stop Oil, and faces the grinding injustice of our political and economic system head on.* ***We're just getting started.****"*

A copy of this page is attached to this statement marked **"SSWB"**.

I believe that the facts stated in this Witness Statement and Exhibits are true.

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

I am duly authorised to make this statement on behalf of the Claimants.



_____

Stuart Sherbrooke Wortley

16 June 2025

CLAIM NO: KB-2024-1765

CLAIM NO: KB-2024-2132

CLAIM NO: KB-2024-2317

CLAIM NO: KB-2024-2473

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Claimants

and

PERSONS UNKNOWN
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IN THE (AMENDED) CLAIM FORMS

Defendants

SSWA

This is the exhibit marked "SSWA" referred to in the witness statement of Stuart Wortley dated 16 June 2025.

Payne, Emma

From: Wortley, Stuart
Sent: 16 June 2025 16:59
To: Wortley, Stuart
Subject: "SSWA"

JUST STOP OIL



Dear Stuart,

Kabul is at risk of becoming the first modern city to run out of water. The world's oceans are a 'ticking timebomb' as ocean acidity reaches critical levels. UK government aid cuts could leave 12 million people without access to clean water in Ethiopia due to climate threats. **The climate crisis is here, it is already threatening millions of lives, and it is coming for us all.** In the face of this, our government is still refusing to act. They are the puppets of the fossil fuel and arms industries--condemning millions to death as th eycontinue to arm the genocide in Gaza and prop up the fossil fuel economy. The only way we will get real change is by **coming together in resistance** in a disciplined and sustained way.

*Join us in London for the **launch weekender** of Seeds of Revolution **training programme** on **Saturday 14th and Sunday 15th June** at **Waterloo Action Centre, SE1 7AA.** Register now:*

Register Now: June 14th & 15th

And it couldn't be easier, or more fun and fulfilling, as Just Stop Oil and Youth Demand kick off a **summer of resistance training**. Learn the theory behind nonviolent revolutions, and how to mass mobilise, harness the grass-root power of local groups, plan actions that cut through, and work, coordinate and lead others to pull off effective strategies. We'll even throw in some free vegan food!

Come and learn how we plant the seeds of the coming nonviolent revolution at two in-person events that bookend four **online sessions**—taking place **every Wednesday** in between. Here's everything you need to know…

Register Now for Launch Weekender

Zoom Sessions: Every Weds @ 6-8PM



Join our launch weekender

When: This Saturday 14th and Sunday 15th June, 10am-6pm

Where: Waterloo Action Centre, London SE1 7AA

We kick off our six-week training programme this weekend with two days of talks and workshops. We'll deep dive into everything from to crafting a campaign identity and DNA, to the necessity for nonviolent struggle, to how we combine street resistance and citizen assemblies to pull off a revolution in the UK. We will be joined by guest speakers including **Phoebe Plummer** as well as representatives from **Not Here to be Liked** and **Assemble**.

As well as teachings and discussion, expect to meet likeminded people in resistance. **Everyone is welcome**, old and young, seasoned veterans and fresh faces. There will be free vegan food, and for those who need it, there is support with travel costs and overnight accommodation. You won't want to miss this one, register now:

Register Now for This Weekend

Need Accommodation? Join This Chat

Travel Costs Holding You Back? We Can Help

Register now for the weekly Zoom sessions

Zoom Calls Wednesdays @ 6-8PM: June 18th, June 25th, July 2nd, July 9th

You'll feel invigorated after the in-person meet-up, keep the momentum going with our **weekly Zoom sessions every Wednesday** and learn even more about nonviolent resistance. You'll gain knowledge on everything from the mobilisation theory, to running local groups, to fostering healthy and resilient cultures, to leadership and how to design actions that cut through.

These sessions will explain all the different ways groups like Youth Demand and Just Stop Oil organise and put pressure on the government, and will be delivered by expert guest speakers from groups like Resilient Uprising. Join us every

Wednesday for four weeks, starting on June 18th at 6-8pm and then the same time on June 25th, July 2nd and July 9th. See the **full agenda** and **register now**:

Zoom Sessions: Every Weds @ 6-8PM

Celebrate at our training programme finale

When: Saturday 12th July at 11am-6pm

Where: London location TBC

The six-week programme of learning will climax with a **final event** for us all to come together **in-person**. Expect a celebratory mood with workshops on coordination and leadership, guest speakers and of course free food! Join our summer of resistance and don't miss a single part of this training programme. Everyone is welcome, **we want to meet you!** Register today:

Register Now for the Finale Event: Sat 12th July

Moved town or region? You can update your details with us here!

With love & gratitude,

Just Stop Oil

Support our work with a monthly donation!

Donate

Website | Facebook | Twitter

Instagram | LinkedIn | YouTube

This email was sent to stuartwortley@eversheds-sutherland.com. If you wish to unsubscribe from our mailing list, please click here to unsubscribe.

CLAIM NO: KB-2024-1765

CLAIM NO: KB-2024-2132

CLAIM NO: KB-2024-2317

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IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

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SSWB

This is the exhibit marked "SSWB" referred to in the witness statement of Stuart Wortley dated 16 June 2025.

JUST STOP OIL

THERE'S MORE TO COME
HELP MAKE IT HAPPEN



Low Wage Supporter

Show solidarity with those taking action with Just Stop Oil's with a low wage monthly donation.

£4 per month

Subscribe

Most popular



Standard Supporter

Give an hour's wage each month to make our resistance movement possible and join as a supporter.

£15 per month

Subscribe

A new campaign is in the works — one that builds on our success as Just Stop Oil, and faces the grinding injustice of our political and economic system head on. **We're just getting started.**

Will you donate to help make it happen?

N244

Application notice

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

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

Name of court The High Court of Justice, Kings Bench Division	**Claim no.** KB-2024-001765
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
PBA0087211	H W F - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) London City Airport Ltd and another	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	17.06.25

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

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

   If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?
   Permission to amend the Claim Form by substituting the attached plan marked 1A for Plan 1 annexed to it.

4. Have you attached a draft of the order you are applying for? ☑ Yes ☐ No

5. How do you want to have this application dealt with? ☑ at a hearing ☐ without a hearing
   ☐ at a remote hearing

6. How long do you think the hearing will last? ____ Hours ____ Minutes
   Is this time estimate agreed by all parties? ☐ Yes ☐ No

7. Give details of any fixed trial date or period: 24.06.25

8. What level of Judge does your hearing need? High Court Judge

9. Who should be served with this application? Defendants

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.
   See para 10(a) and 10(b) of the Order of Mr Justice Julian Knowles dated 20.06.24

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

- ☐ the attached witness statement
- ☐ the statement of case
- ☑ the evidence set out in the box below

If necessary, please continue on a separate sheet.
The Claimant applies for:-

Permission to amend the Claim Form and the annexed Plan 1 to exclude a defined area of land that was previously within the Claimants control but has since been leased to a third party and is no longer within its possession. The circumstances of the new lease are referred to in the witness statement of Stuart Sherbrooke Wortley dated 06.06.25.

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

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

☑ No

Statement of Truth

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

☐ **I believe** that the facts stated in section 10 (and any continuation sheets) are true.

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

Signature



☐ Applicant

☐ Litigation friend (where applicant is a child or a Protected Party)

☑ Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
1 7	0 6	2 0 2 5

Full name

Emma Payne

Name of applicant's legal representative's firm

Eversheds Sutherland (International) LLP

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

Paralegal

Applicant's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Postcode

E C V 2 7 W S

If applicable

Phone number

Fax phone number

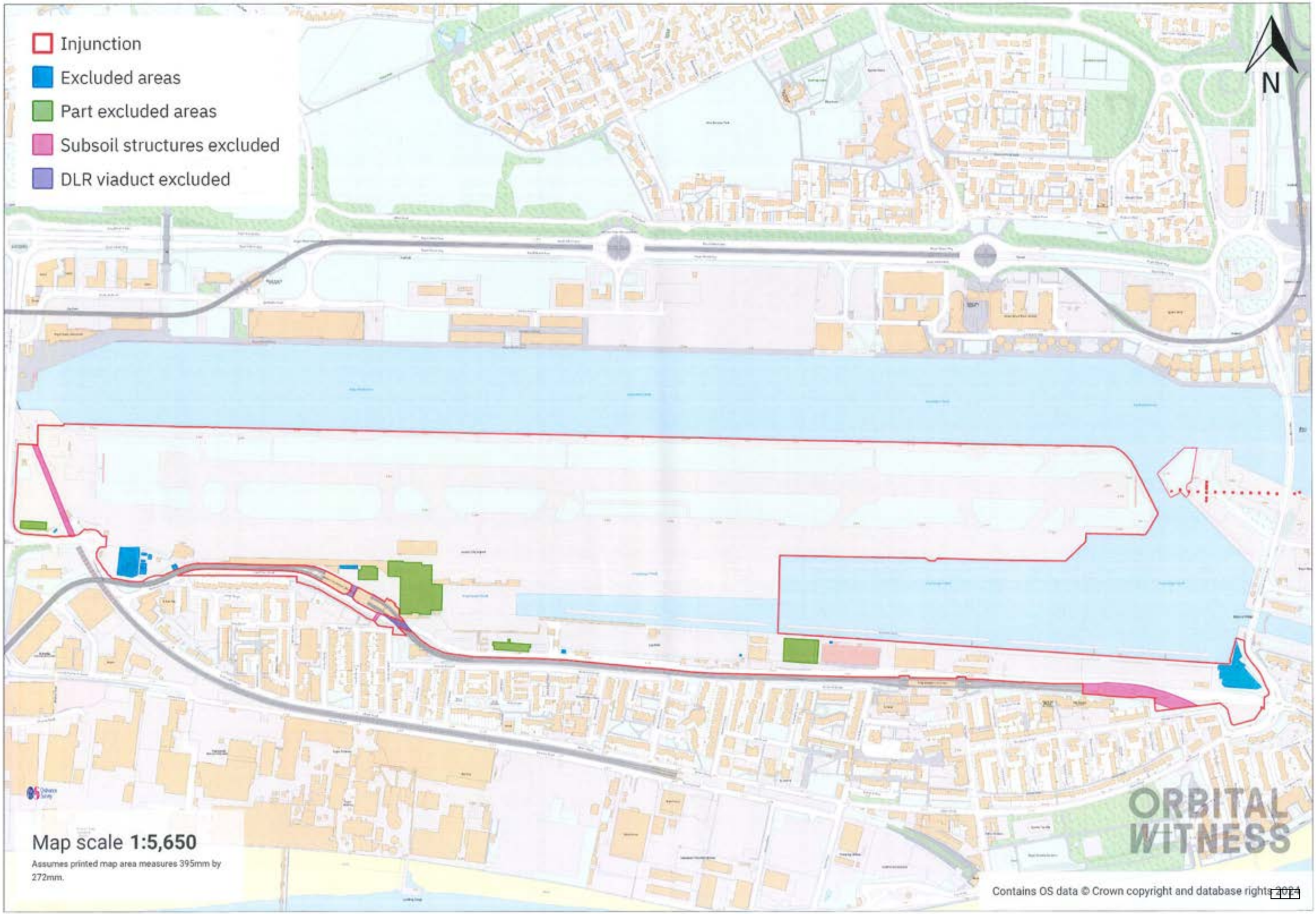
DX number

Your Ref.

2926599.000057

Email

emmapayne@eversheds-sutherland.com


Injunction
Excluded areas
Part excluded areas
Subsoil structures excluded
DLR viaduct excluded
N
Map scale 1:5,650
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024