

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
(2) LONDON LUTON AIRPORT OPPERATIONS LIMITED
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

Claimants

and

PERSONS UNKNOWN
AS DESCRIBED IN THE CLAIM FORM

Defendants

BUNDLE FOR HEARING
ON 18 JULY 2024

| | | Date | Page No. |
|--|------------------------------------|------------------------|----------|
| LBA | Draft Order | | 3-7 |
| | Schedule 1 - Plan 1 | | 8-9 |
| | Schedule 2 - C1 undertaking | | 10 |
| | Schedule 3 - Ds’ email addresses | | 11 |
| | Schedule 4 - Draft Warning Notice | | 12-13 |
| LTN | Draft Order | | 14-18 |
| | Schedule 1 - Plan 2 | | 19-20 |
| | Schedule 2 - C2 undertaking | | 21 |
| | Schedule 3 - Ds’ email addresses | | 22 |
| | Schedule 4 - Draft Warning Notice | | 23-24 |
| NCL | Draft Order | | 25-29 |
| | Schedule 1 - Plan 3 | | 30-31 |
| | Schedule 2 - C3 and C4 undertaking | | 32 |
| | Schedule 3 - Ds’ email addresses | | 33 |
| | Schedule 4 - Draft Warning Notice | | 34-35 |
| Statements of Case | | | |
| Sealed Claim Form | | 16.07.2024 | 36-41 |
| Schedule 1 | | | 42 |
| Plans 1 - 3 | | | 43-45 |
| Particulars of Claim | | 16.07.2024 | 46-59 |
| Title Schedule | | | 60-61 |
| Application | | | |
| Sealed Application Notice | | 16.07.2024 | 62-66 |
| Witness Statements and Exhibits | | | |
| Vincent John Hodder | | 15.07.2024 | 67-87 |
| VJH1 – LBA Byelaws | | 21.08.2022 | 88-113 |
| VJH2 – Media articles relating to protests at Leeds Bradford Airport | | June 2019 - March 2020 | 114-161 |

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

CLAIM NO:

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 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

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 [] July 2024

AND UPON the Claimants' application for an injunction dated [] July 2024 ("**the Application**")

AND UPON READING the Application and the witness statement of Alexander James Wright dated [] July 2024, Vincent Hodder dated [] July 2024, Nicholas Jones dated [] July 2024 and Alberto Martin dated [] July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

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

IT IS ORDERED THAT:

DEFINITIONS

1. “**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**”).
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.leedsbradfordairport.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 Defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport without the consent of the First Claimant;
4. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the 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**”) upon the First Defendant:
 - 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 or, alternatively, setting out the same information on the Warning Notice referred to at paragraph 6(d) below.

6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the First Defendant by the First Claimant carrying out each of the following steps:
 - a. Uploading a copy of the Order 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 attaching a copy of this Order.
 - c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an “X” on Plan 1.
 - d. Affixing Warning Notices of A2 size at those locations marked with an “X” on Plan 1.
7. The taking of such steps set out at paragraph 5 and 6 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.
8. The Court will provide sealed copies of this Order to the First Claimant’s solicitors for service (whose details are set out below).
9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.
10. 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 6. The step described at paragraphs 6(c)-(d) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

11. 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 paragraphs 5(a) to (b).

12. 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 to the First Claimant's solicitors at least 48 hours in advance of any hearing.
13. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
14. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
15. No acknowledgment of service, admission or defence is required by any party until further so ordered.
16. Costs are reserved.

COMMUNICATIONS WITH THE FIRST CLAIMANT

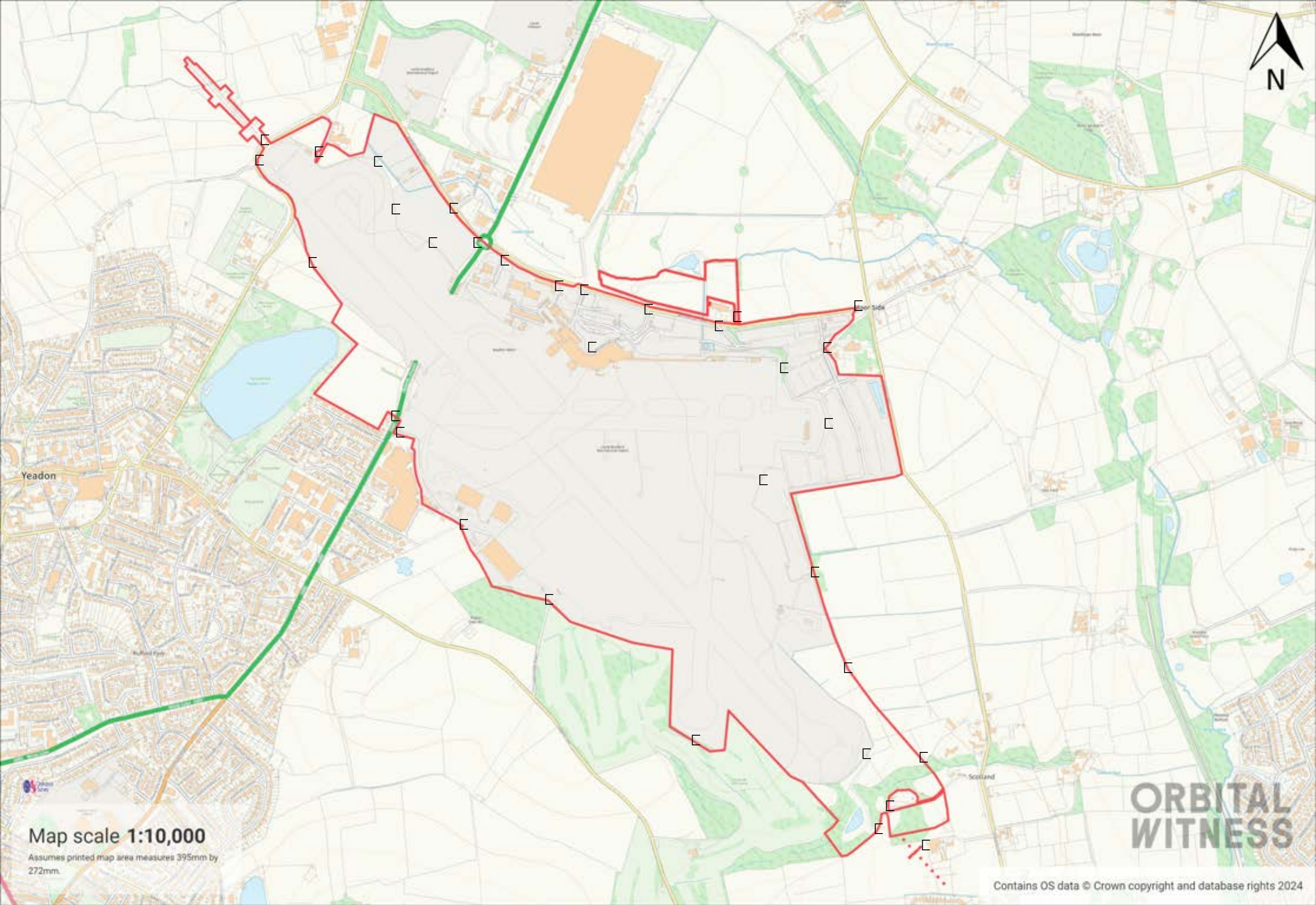
17. The First Claimant's solicitors and their contact details are:

(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



Map scale 1:10,000

Assumes printed map area measures 395mm by 272mm.

ORBITAL
WITNESS

Contains OS data © Crown copyright and database rights 2024

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

- (1) The First Claimant will take steps to serve the First Defendant with a note of the hearing dated [] July 2024 by [] July 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 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED INSERT ("the Order")

TO: Persons Unknown whose purpose is or includes protest on the premises at Leeds Bradford Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil campaign 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 campaign and/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 without the consent of the First Claimant.

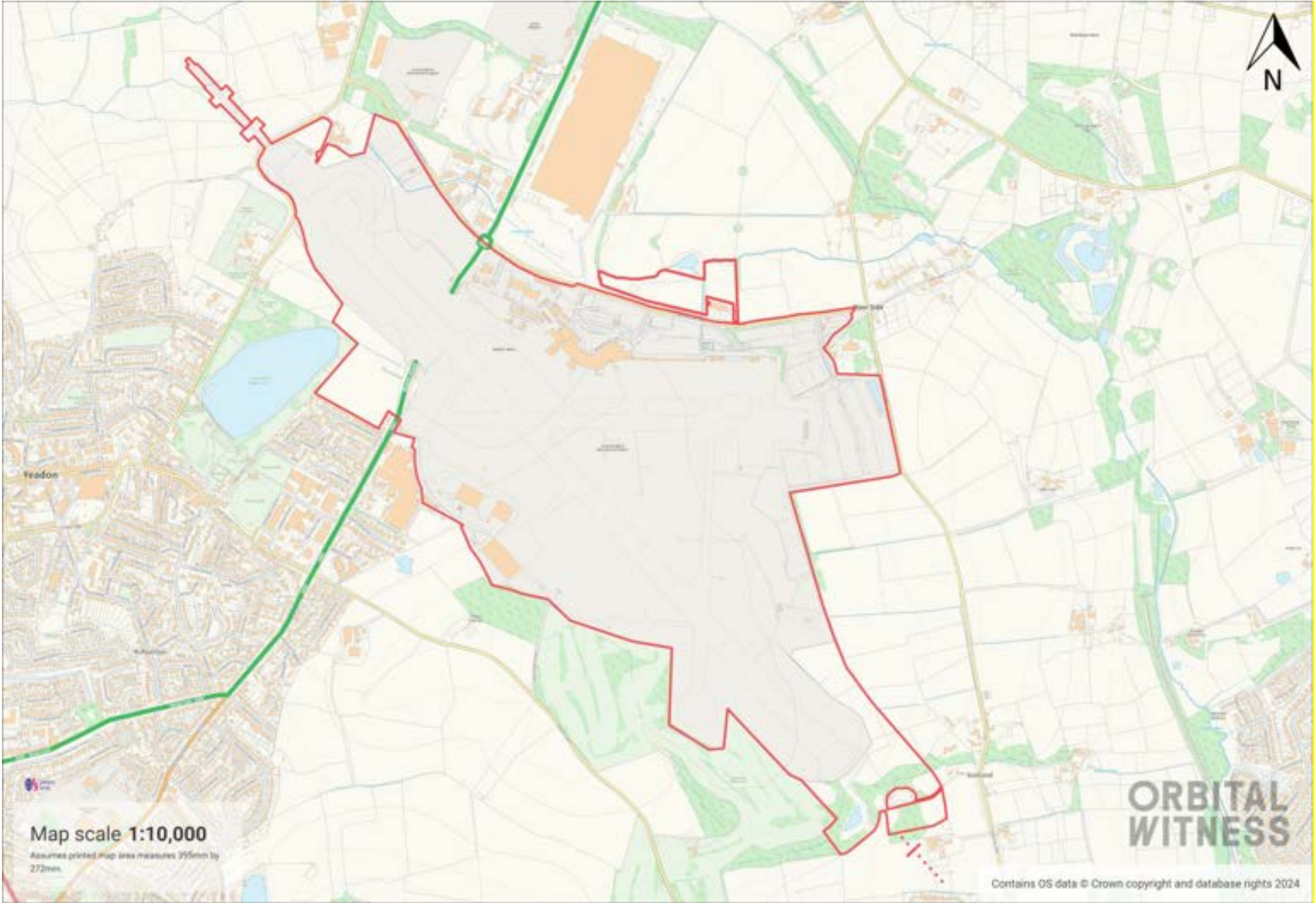
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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.



IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

CLAIM NO:

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 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

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 [] July 2024

AND UPON the Claimants' application for an injunction dated [] July 2024 ("**the Application**")

AND UPON READING the Application and the witness statement of Alexander James Wright dated [] July 2024 , Vincent Hodder dated [] July 2024, Nicholas Jones dated [] July 2024 and Alberto Martin dated [] July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

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

IT IS ORDERED THAT:

DEFINITIONS

1. “**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**”).
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).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of London Luton Airport without the consent of the Second Claimant.
4. This Order is subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Second Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) upon the Second Defendant:
 - a. Uploading a copy onto the following website: <https://www.london-luton.co.uk/corporate/lla-publications/injunction>.
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
 - 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 or, alternatively, setting out the same information on the Warning Notice referred to at paragraph 6(d) below.

6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the Second Defendant by the Second Claimant carrying out each of the following steps:
 - a. Uploading a copy of the Order 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 attaching a copy of this Order.
 - c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an “X” on Plan 2.
 - d. Affixing Warning Notices of A2 size at those locations marked with an “X” on Plan 2.
7. The taking of such steps set out at paragraph 5 and 6 shall be good and sufficient service of this Order and of the Claim Documents upon the Second Defendant and each of them.
8. The Court will provide sealed copies of this Order to the Second Claimant’s solicitors for service (whose details are set out below).
9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.
10. 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 6. The step described at paragraphs 6(c)-(d) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

11. Service on the Second Defendant of any further applications or documents in the proceedings by the Second Claimant shall be effected by carrying out each of the steps in paragraphs 5(a) to (b).

12. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Second Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Second Claimant's solicitors at least 48 hours in advance of any hearing.
13. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
14. The Second Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
15. No acknowledgment of service, admission or defence is required by any party until further so ordered.
16. Costs are reserved.

COMMUNICATIONS WITH THE SECOND CLAIMANT

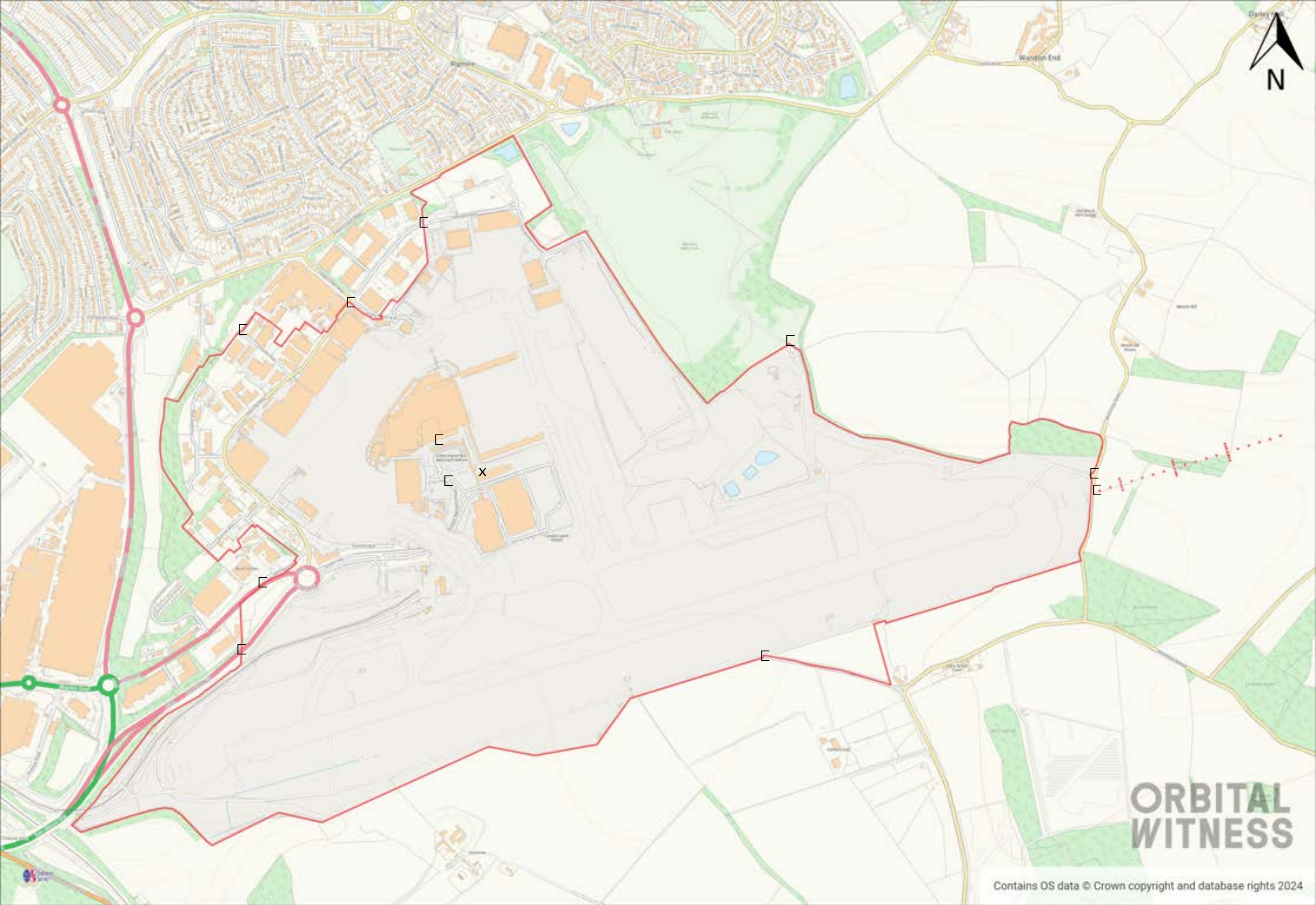
17. The Second Claimant's solicitors and their contact details are:

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

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

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

SCHEDULE 1



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND CLAIMANT

- (1) The Second Claimant will take steps to serve the Second Defendant with a note of the hearing dated [] July 2024 by [] July 2024.

- (2) The Second Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED **INSERT** (“the Order”)

TO: Persons Unknown whose purpose is or includes protest on the premises at London Luton Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil campaign 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 campaign and/or Extinction Rebellion campaign or otherwise) (the “**Defendants**”)

FROM: London Luton Airport Operations Limited (the “**Second Claimant**”)

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

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

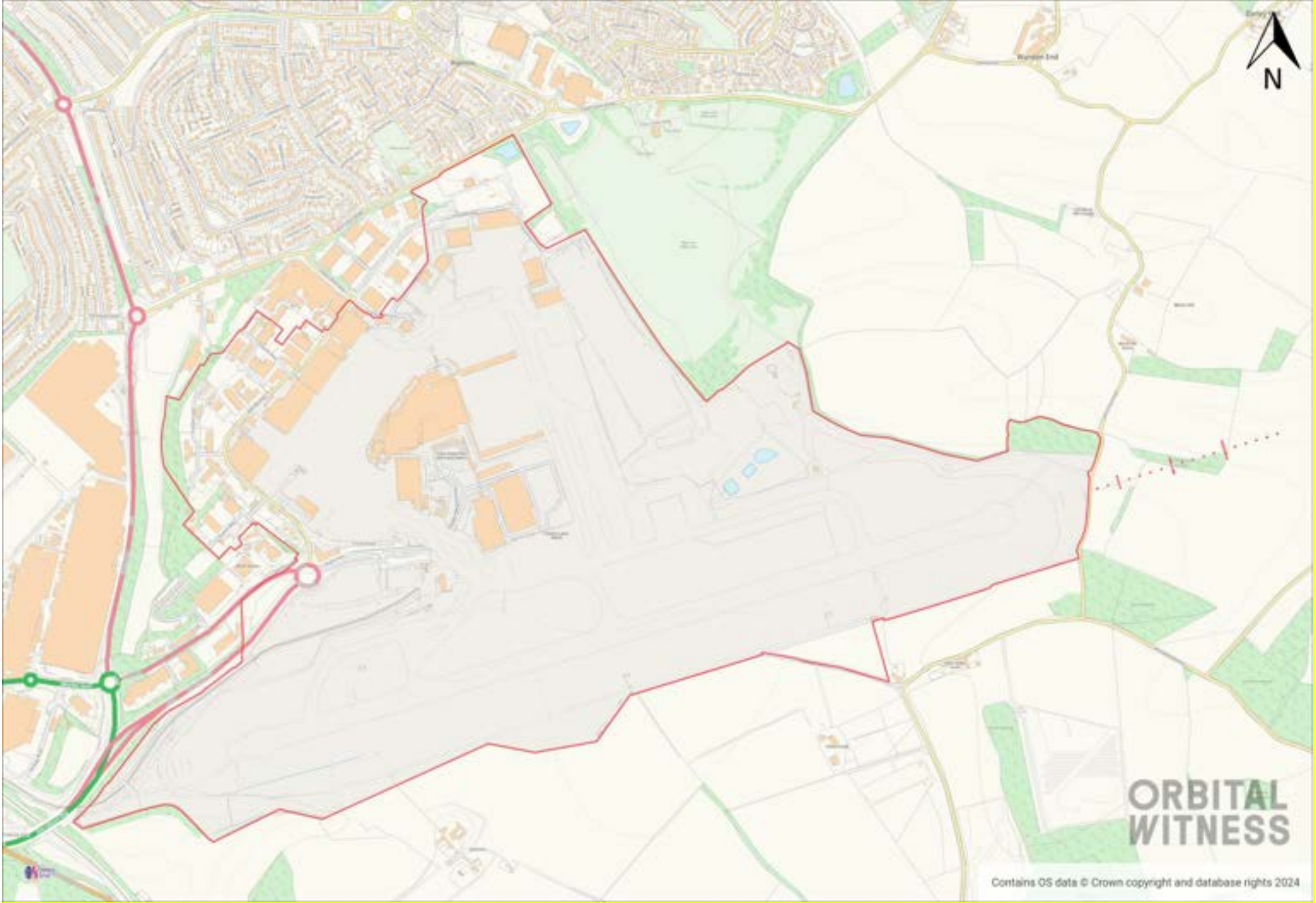
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Second Claimant’s solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: <https://www.london-luton.co.uk/corporate/lla-publications/injunction>

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



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 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

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 [] July 2024

AND UPON the Claimants' application for an injunction dated [] July 2024 ("**the Application**")

AND UPON READING the Application and the witness statement of Alexander James Wright dated [] July 2024, Vincent Hodder dated [] July 2024, Nicholas Jones dated [] July 2024 and Alberto Martin dated [] July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

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

IT IS ORDERED THAT:

DEFINITIONS

1. "**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**").

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.newcastleairport.com/about-your-airport/airport-company/injunction/> at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Newcastle International Airport without the consent of the Third and Fourth Claimants (or either of them).
4. This Order is subject to periodic review by the Court on application by the Third and Fourth 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 Third and Fourth Claimants shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) upon the Third Defendant:
 - a. Uploading a copy onto the following website:
<https://www.newcastleairport.com/about-your-airport/airport-company/injunction/>
 - b. Sending an email 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 or, alternatively, setting out the same information on the Warning Notice referred to at paragraph 6(d) below.
6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the Third Defendant by the Third and Fourth Claimants carrying out each of the following steps:

- a. Uploading a copy of the Order 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 attaching a copy of this Order.
 - c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an “X” on Plan 3.
 - d. Affixing Warning Notices of A2 size at those locations marked with an “X” on Plan 3.
7. The taking of such steps set out at paragraph 5 and 6 shall be good and sufficient service of this Order and of the Claim Documents upon the Third Defendant and each of them.
8. The Court will provide sealed copies of this Order to the Third and Fourth 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.
10. 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 6. The step described at paragraphs 6(c)-(d) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

11. Service on the Third Defendant of any further applications or documents in the proceedings by the Third and Fourth Claimants shall be effected by carrying out each of the steps in paragraphs 5(a) to (b).

12. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Third and Fourth Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Third and Fourth Claimants' solicitors at least 48 hours in advance of any hearing.
13. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
14. The Third and Fourth Claimants (or either of them) have liberty to apply to vary, extend or discharge this Order or for further directions.
15. No acknowledgment of service, admission or defence is required by any party until further so ordered.
16. Costs are reserved.

COMMUNICATIONS WITH THE THIRD AND FOURTH CLAIMANTS

17. The Third and Fourth Claimants' solicitors and their contact details are:

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

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

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

SCHEDULE 1



ORBITAL
WITNESS



Contains OS data © Crown copyright and database rights 2024

**SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE THIRD AND FOURTH
CLAIMANTS**

- (1) The Third and Fourth Claimants will take steps to serve the Third Defendant with a note of the hearing dated [] July 2024 by [] July 2024.

- (2) The Third and Fourth Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED **INSERT** (“the Order”)

TO: Persons Unknown whose purpose is or includes protest on the premises at Newcastle International Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil campaign 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 campaign and/or Extinction Rebellion campaign or otherwise) (the “**Defendants**”)

FROM: Newcastle International Airport Limited and NIAL Services Limited (the “**Third and Fourth Claimants**”)

This notice relates to the land known as Newcastle International Airport which is shown edged red on the Plan below (the “**Airport**”)

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

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

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

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Third and Fourth Claimants’ solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at:
<https://www.newcastleairport.com/about-your-airport/airport-company/injunction/>

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





Claim Form

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.

| | |
|--|-----------------|
| In the High Court of Justice Kings Bench Division | |
| Fee Account no. | |
| Help with Fees - Ref no. (if applicable) | H W F - - - - - |
| For court use only | |
| Claim no. | |
| Issue date | |

Claimant(s) name(s) and address(es) including postcode

- (1) of Leeds LS19 7TU
- (2) of Percival House, 134 Percival Way, Luton Airport, Luton LU2 9NU
- (3) of Woolsington, Newcastle Upon Tyne, NE13 8BZ
- (4) of Unit 1,Prestwick Industrial Est., Ponteland, Newcastle Upon Tyne, NE20 9DA



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 | |

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.

□□□□□□□□1

Email

| |
|--|
| |
|--|

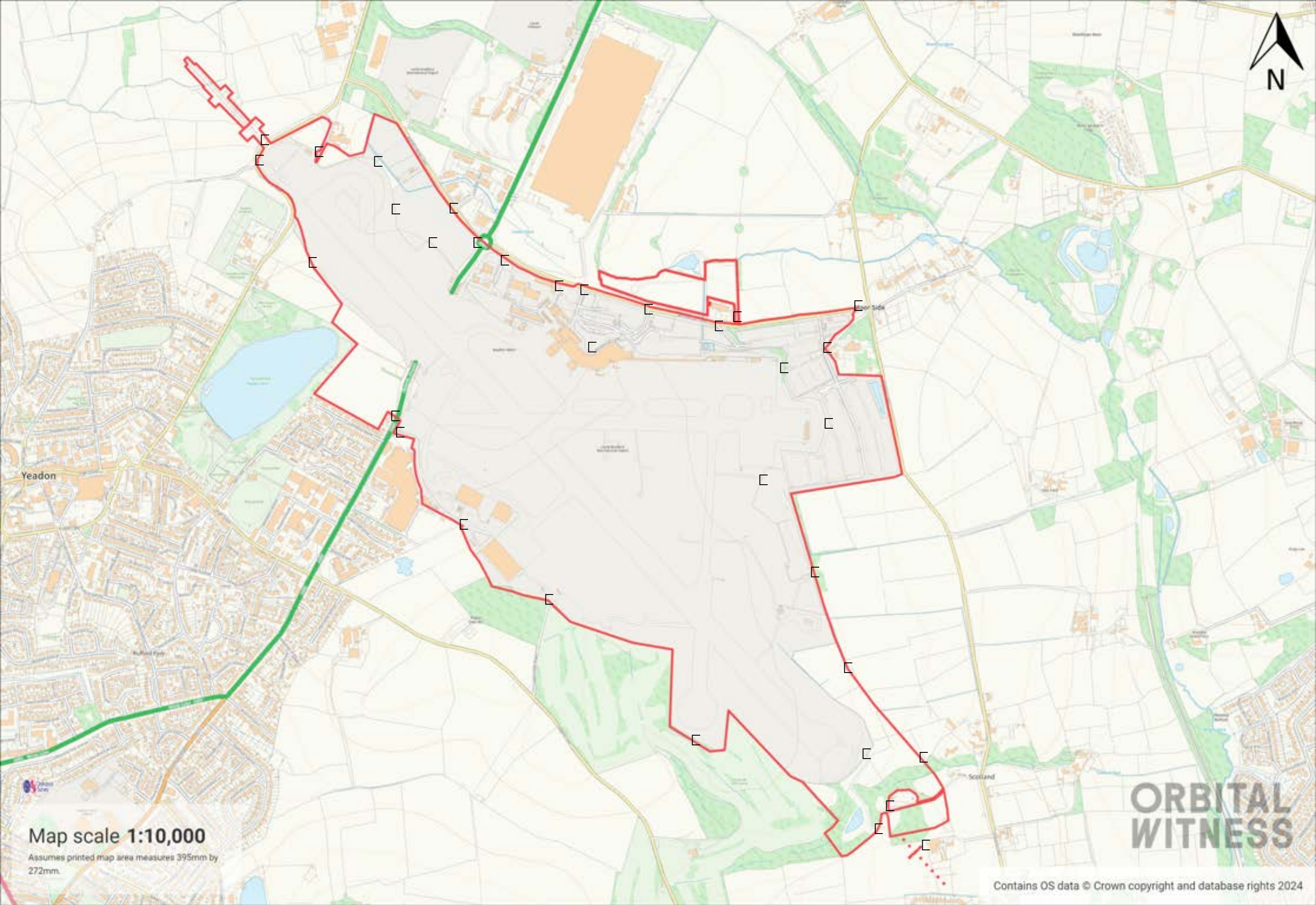
Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form:
<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

SCHEDULE 1 TO THE CLAIM FORM

- (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 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)

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 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN 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 STANSTED 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 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 EAST MIDLANDS 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 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)

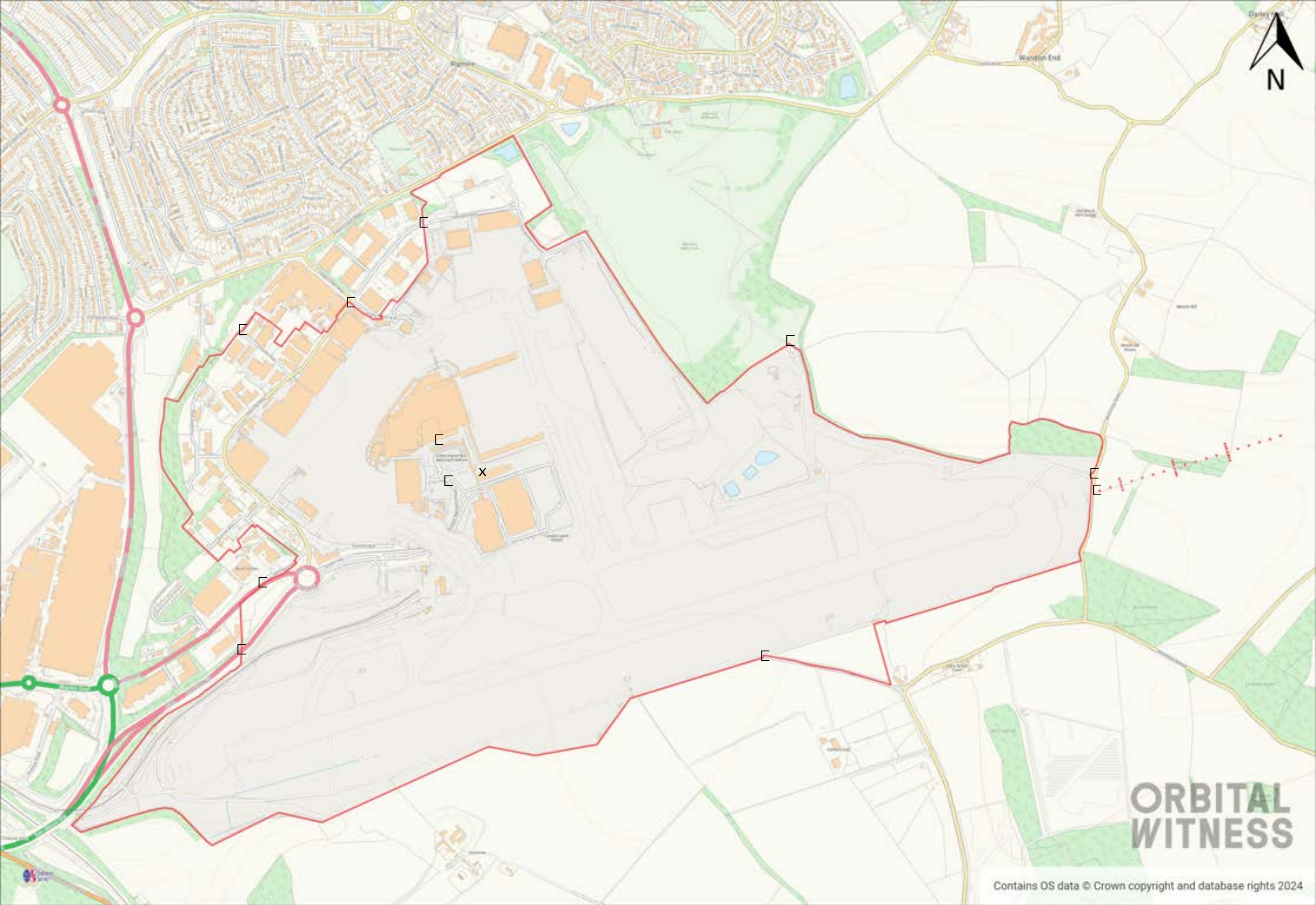


Map scale 1:10,000

Assumes printed map area measures 395mm by 272mm.

ORBITAL
WITNESS

Contains OS data © Crown copyright and database rights 2024





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 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

PARTICULARS OF CLAIM

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/tZIoduqqqTMtE9dgMMhlaymvEZgO45jqJ19A>)

¹ As of 11 July 2024, £24,275 had been raised on this website.

People across Europe will be taking the fight to airports, the heart of the fossil economy.

This summer's actions across multiple countries will go down in history.

Want to meet the people making this happen?

Every Thursday for the next four weeks starting on the 13th of JUNE, 6.30pm

You don't want to miss this.

See you there,

Just Stop Oil"

35. On 2 June 2024, Extinction Rebellion environmental activists blocked access to Farnborough Airport.
36. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at London Stansted Airport (in an area which is subject to an occupational arrangement with a third party), as part of a series of protests on climate change. This included:
 - a. an individual using an angle grinder to cut a hole in the perimeter fence of the airport;
 - b. two individuals trespassing the perimeter fence; and
 - c. spray painting two aircrafts orange using a fire extinguisher.
37. As a result of this direct action:
 - a. It was necessary to suspend operations on the runway at Stansted Airport for approximately 50 minutes: three aircraft departures were affected.
 - b. the two individuals (known as Jenifer Kowalski and Cole Macdonald) were arrested and charged with causing criminal damage, aggravated trespass and interference with the use or operation of national infrastructure.
38. Further, in respect of LBA and Luton Airport:
 - a. in the period between 2019 and 2022, Extinction Rebellion repeatedly carried out protests about the planned expansion of LBA, including on highways and/or accessways to LBA. In September 2023, the First Claimant commenced construction works at LBA in order to expand the airport.

- b. in the period between 2020 and 30 May 2024, various environmental protest groups carried out protests against the expansion of Luton Airport.
39. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for LBA, Luton Airport and/or Newcastle Airport
- a. trespass on the airports and/or
 - b. by protest conducted on or from the Third Party Areas and/or on or from the land on which the LBA Landing Lights, Luton Landing Lights and/or Newcastle Landing Lights are situate, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or
 - c. by protest conducted on or from the highways, obstruct those occasioning particular damage to the Claimants and/or interfere with the Claimants' right of access to the airports via those highways, so as to cause a nuisance actionable by the Claimants.
40. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.
41. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:
42. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.
43. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive — by which point harm may already have occurred.

44. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.
45. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.
46. The airports in the present case are all the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the Claimants are fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the Byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at Stansted Airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.
47. Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.
48. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND THE FIRST CLAIMANT CLAIMS AGAINST THE FIRST DEFENDANT:

- (1) Subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months or such other period as the Court may determine, an order that the First Defendants must not, without the consent of the First Claimant enter, occupy or remain upon the land outlined in red on Plan 1.

AND THE SECOND CLAIMANT CLAIMS AS AGAINST THE SECOND DEFENDANT:

- (2) Subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent of the Second Claimant, enter, occupy or remain upon the land outlined in red on Plan 2.

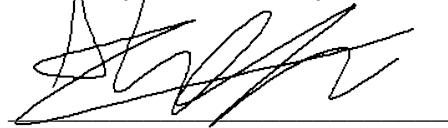
AND THE THIRD AND FOURTH CLAIMANTS CLAIM AGAINST THE THIRD DEFENDANT:

- (3) Subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Third Defendants must not, without the consent of the Third and Fourth Claimants (or either of them), enter, occupy or remain upon the land outlined in red on Plan 3.

STATEMENT OF TRUTH

The Claimants believe that the facts stated in these 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 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 |

Application notice

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

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

| | | | |
|---|--|--|--|
| Name of court | | Claim no. | |
| Fee account no. (if applicable) | | Help with Fees – Ref. no. (if applicable) | |
| | | HWF- - - - - | |
| Warrant no. (if applicable) | | | |
| Claimant's name (including ref.) Leeds Bradford Airport Limited and ors | | | |
| Defendant's name (including ref.) Persons not as more particularly described in the Schedule 1 of the Claim Form | | | |
| Date | | 16 Jul 2024 | |

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

Per sheds Sutherland (International) LLP

KB-2024-002317

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) An injunction to restrain the Defendants from entering occupying or remaining on the land defined in the Particulars of Claim and (2) An order for service of the Claim Form on the Defendants in the Particulars of Claim the Application Notice evidence in support and the Order Injunction by alternative means pursuant to CPR 11.1(1) CPR 11.1(2) CPR 11.1(3) and CPR 11.1(4)

4. Have you attached a draft of the order you are applying for?

☐ Yes

☐ No

5. How do you want to have this application dealt with?

☐ at a hearing

☐ without a hearing

☐ at a remote hearing

6. How long do you think the hearing will last?

Hours

Minutes

Is this time estimate agreed by all parties?

☐ Yes

☐ No

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

9. Who should be served with this application?

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

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

- ☐ the attached witness statement
- ☐ the statement of case
- ☐ the evidence set out in the box below

If necessary, please continue on a separate sheet.

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

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

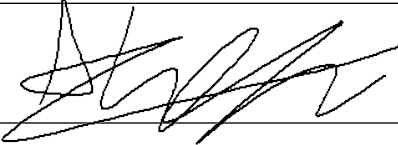
☐ No

Statement of Truth

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

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

Signature



- ☐ Applicant
- ☐ Litigation friend (where applicant is a child or a Protected Party)
- ☐ Applicant’s legal representative (as defined by CPR 2.3(1))

Date

| | | |
|----------------------|----------------------|----------------------|
| Day | Month | Year |
| <input type="text"/> | <input type="text"/> | <input type="text"/> |

Full name

Name of applicant’s legal representative’s firm

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

Applicant’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

Fax phone number

DX number

Your Ref.

Email

Claimants
Vincent John Hodder
First Witness Statement
Date: 15 July 2024
Exhibit VJH1 – VJH5

CLAIM NO: KB – 2024 -

IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
B E T W E E N

- (1) LEEDS BRADFORD AIRPORT LIMITED
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
- (4) NIAL SERVICES LIMITED

Claimants

-and-

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)
- (2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)
- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

FIRST WITNESS STATEMENT OF
VINCENT JOHN HODDER

I, Vincent John Hodder, of Leeds Bradford Airport Limited, Leeds LS19 7TU, WILL SAY AS FOLLOWS –

1. I am employed by the First Claimant, Leeds Bradford Airport Limited, as Chief Executive Officer. The First Claimant operates the international airport known as Leeds Bradford Airport ("**Leeds Bradford Airport**"), serving circa 4 million customers a year and flying to over 80 destinations.
2. I am responsible for devising and delivering the strategy for the First Claimant and for its performance against that strategy.
3. As I explain below:-
 - 3.1 Just Stop Oil (an environmental campaign group) ("**JSO**") is threatening to disrupt operations at British airports during the summer of 2024 and there have already been incidents of protests at British airports by JSO this summer;
 - 3.2 The First Claimant has an ongoing £100 million regeneration project which will result in the expansion of Leeds Bradford Airport. Leeds Bradford Airport has previously been the subject of protests by Extinction Rebellion ("**XR**"), as well as other environmental activist groups, who oppose the expansion of the airport; and
 - 3.3 The First Claimant has decided to apply for an injunction in respect of Leeds Bradford Airport, shown edged red on Plan 1 attached to the Claim Form.
4. I make this witness statement in support of the application made jointly by the First Claimant for an injunction at Leeds Bradford Airport and by:
 - 4.1 the Second Claimant for an injunction at London Luton Airport ("**Luton Airport**"); and
 - 4.2 the Third and Fourth Claimants for an injunction at Newcastle International Airport ("**Newcastle Airport**").
5. The Claimants share common ownership (the First Claimant is wholly owned by an investment fund which also owns shares in the Second and Third Claimants. The Fourth Claimant is a wholly owned subsidiary of the Third Claimant). The Claimants have therefore agreed to make the application for an injunction jointly.
6. The facts and matters set out by me in this witness statement are either known by me directly and are true, or are known by me indirectly and are believed to the best of my knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief. This statement was prepared through email correspondence and discussions with the Claimants' legal representatives. I am duly authorised by the Claimants to make this statement.

- 7. I have read a copy of the accompanying witness statements of Alexander Wright, Nicholas Jones and Alberto Martin.
- 8. I refer to exhibits marked “**VJH1 – VJH5**” in this statement. They have been produced to me and I verify that the documents in those exhibits are true copies of the documents.
- 9. I should say at the outset that the Claimants are not trying to prohibit or restrain peaceful and lawful protest, and accept that this is a fundamental and important human right. They only seek to restrain protest activity that goes beyond that which is peaceful and lawful.
- 10. To assist in the navigation of this witness statement, I shall address:
 - 10.1 Section 1: Leeds Bradford Airport – Business Overview
 - 10.2 Section 2: Multiflight
 - 10.3 Section 3: Access to Leeds Bradford Airport
 - 10.4 Section 4: Statutory Obligations on Airport Operators
 - 10.5 Section 5: Leeds Bradford Airport Byelaws
 - 10.6 Section 6: Enforcement of the Leeds Bradford Airport Byelaws
 - 10.7 Section 7: Threat of Direct Action at Leeds Bradford Airport
 - 10.8 Section 8: Protests at Leeds Bradford Airport
 - 10.9 Section 9: Protests at other airports
 - 10.10 Section 10: Security and Health and Safety
 - 10.11 Section 11: Operational Disruption and Financial Harm
 - 10.12 Section 12: Apprehension of Future Protests and Harm
 - 10.13 Section 13: The Balance of Convenience / Compelling Justification
 - 10.14 Section 14: Cross-Undertaking in Damages

SECTION 1: LEEDS BRADFORD AIRPORT – BUSINESS OVERVIEW

- 11. Leeds Bradford Airport is the Yorkshire region’s largest airport. Circa 4 million passengers pass through every year to reach a wide range of international destinations. We directly facilitate 10 airlines to serve the leisure and business market, and lease an area of our land to Multiflight Limited (“**Multiflight**”) (see further below) who operate a fixed base operation for private jets.

- 12. The First Claimant has since September 2023 embarked on the most significant expansion in the history of the airport, known as LBA:REGEN which is a £100 million investment to expand the terminal and improve the customer experience through our airport. When the development has completed, Leeds Bradford Airport will be able to accommodate circa 7 million passengers per year, a significant increase on the current circa 4 million passengers.
- 13. 515 members of staff are currently employed directly by the First Claimant. A further circa 2,500 members of staff are employed across Leeds Bradford Airport including by our business partners. During July and August 2024, we expect to service around 17,200 travelling passengers each day through our terminal (excluding passengers travelling with Multiflight).
- 14. Our operating hours (for flight departures and arrivals) are 24 hours a day, 7 days a week excluding Christmas Day when we are closed. We do have a period overnight where no commercial flights operate; but the landside terminal remains open.
- 15. Leeds Bradford Airport is incredibly busy, particularly at the start of the day, and there is always a constant stream of people so free access to the airport is required at all times to ensure that operations can run, and that the surrounding road network remains free-flowing and is not adversely impacted due to restricted access at Leeds Bradford Airport.
- 16. Leeds Bradford Airport receives around 25 deliveries on a daily basis (i) to the goods yard; (ii) through the gatehouse (the alternative security entrance for contractors and staff who work airside) and (iii) to our LBA:REGEN site. The deliveries that enter and exit Leeds Bradford Airport are a mixture of tankers and other HGV lorries, and as Whitehouse Lane (which runs along the northern edge of the main airport site) is the only access road, all of the vehicles travelling to and from the airport use this road.
- 17. I am informed by my finance team that projected daily income for Leeds Bradford Airport in July and August 2024 is around £195,000.
- 18. Strictly speaking, Leeds Bradford Airport has one runway. However, the direction of take-off and landing into Leeds Bradford Airport can be changed based on wind direction so the airport has two options for using the runway. The runway is also used by Multiflight and our 10 commercial airlines for take-off and landing. If the runway is blocked, as was the case in October 2023 when a TUI aircraft exited the runway on landing, the airport cannot operate and flights are diverted, delayed and may be cancelled. In the event of the October 2023 incident, the airport was closed for around 24 hours.

SECTION 2: MULTIFLIGHT

- 19. Multiflight provides private aviation services and facilities from Leeds Bradford Airport. They are a tenant of Leeds Bradford Airport and are located on the opposite side of the runway to the main passenger terminal at the airport.

- 20. In 2023, Leeds Bradford Airport had 2,083 private movements in addition to the commercial airline operations, making up a significant proportion of the airport’s daily movements.
- 21. I am including this information relating to Multilight as some of the more recent protests by JSO and Last Generation (an environmental protest group) have targeted private jets. With Leeds Bradford Airport having multiple private charters a day, the First Claimant reasonably apprehends this will increase the risk of it being the target of protestor action and, as explained in paragraph 66, any blockage to the runway will disrupt both Multiflight operations and the operation of Leeds Bradford Airport generally.

SECTION 3: ACCESS TO LEEDS BRADFORD AIRPORT

- 22. The nature of an airport is such that members of the general public have a licence to enter for the purposes of air travel or directly related purposes (such as dropping-off and picking-up those who are travelling). Individuals do not generally have a licence to enter for other purposes. They certainly have no licence to enter for the purpose of carrying out a protest or direct action. That much is obvious from the fact that such conduct may actively interfere with the primary activity of the airport (especially if such conduct is deliberately aimed at so interfering).
- 23. For clarity in this statement, where I refer to “airside” I refer to any area which is the other side of the security checks set out at Section 10 below. Any area before these security checks is known as “landside”.

SECTION 4: STATUTORY OBLIGATIONS ON AIRPORT OPERATORS

- 24. The First Claimant is the person who has the management of Leeds Bradford Airport for the purposes of being an “airport operator” under the Airports Act 1986.
- 25. Airports are subject to a significant amount of regulation, the following of which are relevant:
 - 25.1 Because they are engaged in commercial operations, have paved runways of greater than 800 metres and are open to the public, airports are required to be certificated by the Civil Aviation Authority (“**the CAA**”) by Article 2 and 34(1) of the Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 (“**the 2018 Regulations**”). This was assimilated into English law from 31 December 2020 by virtue of the European Union (Withdrawal) Act 2018.
 - 25.2 By article 33, Annex VII of the 2018 Regulations sets out essential requirements for an airport and the operation of it. By Annex VII, the aerodrome operator is responsible for, among other things, ensuring the safe operation of aircraft at the aerodrome (paragraph 2.1(a)); taking appropriate measures to mitigate the risks of non-compliance with the responsibility to ensure the safe operation of aircraft (paragraph 2.1(b)); ensuring that the movements of vehicles and person in the movement area and other operational areas are coordinated in order to avoid collisions and damage to aircraft (paragraph 2.1(d));

ensuring that adequate aerodrome rescue and firefighting services are provided and that they respond to an incident or accident with due urgency (paragraph 2.1(j)); ensuring that any person permitted unescorted access to the movement area or other operational areas is adequately trained and qualified for such access (paragraph 2.1(l)); safeguarding the airspace around the aerodrome movement area from obstacles so as to permit the intended aircraft operations without creating an unacceptable risk by development of obstacles around the airport (paragraph 3.1.1); removing objects posing an unacceptable risk or taking appropriate mitigating action to protect aircraft using the aerodrome (paragraph 3.1.2); and monitoring hazards related to human activities and land use and mitigating the risk caused by them as appropriate, including developments or change in land use in the aerodrome area (paragraph 3.2).

- 25.3 In order to obtain a certificate, the airport must comply with the features set out in the Commission Regulation (EU) No 139/2014 ("**the 2014 Regulations**"). Leeds Bradford Airport holds a certificate from the CAA.
- 25.4 By article 1(3) and (4) of the 2014 Regulations, airports have to comply with Annex III and IV. This means that:
- 25.4.1 the First Claimant is responsible for the safe operation and maintenance of the aerodrome in accordance with Regulation (EC) No 216/2008 and its Implementing Rules; the terms of its certificate; the content of the aerodrome manual; and any other manuals for the aerodrome equipment available at the aerodrome, as applicable: Annex III, ADR.OR.C.005, paragraph 1(a);
 - 25.4.2 the First Claimant is also responsible for ensuring the provision of air navigation services appropriate to the level of traffic and operating conditions at the airport and the design and maintenance of flight procedures: Annex III, ADR.OR.C.005, paragraph 1(b);
 - 25.4.3 if an unsafe condition develops at the aerodrome, the aerodrome operator is required, under the 2014 Regulations, to, without undue delay, take all necessary measures to ensure that those parts of the aerodrome found to endanger safety are not used by aircraft: Annex III, ADR.OR.C.005, paragraph 1(c);
 - 25.4.4 the First Claimant must have procedures to prevent fires from occurring: Annex III, ADR.OR.C.040, paragraph 1(a);
 - 25.4.5 the First Claimant must provide the services under Subpart B of Annex IV directly or indirectly which include: emergency planning; rescue and firefighting services; assessing runway conditions; verification that those storing and dispensing fuel to aircraft have procedures to ensure that aircraft are provided with uncontaminated fuel of the correct specification;

- 25.4.6 importantly, under ADR.OPS.B.075(a), one of the services they have to provide is monitoring the airport and its surroundings:
 - 25.4.6.1 obstacle limitation and protection surfaces as established in accordance with the certification basis, and other surfaces and areas associated with the aerodrome, in order to take, within its competence, appropriate action to mitigate the risks associated with the penetration of those surfaces and areas;
 - 25.4.6.2 marking and lighting of obstacles in order to be able to take action within its competence, as appropriate; and
 - 25.4.6.3 hazards related to human activities and land use in order to take action within its competence, as appropriate;
- 25.4.7 ADR.OPS.B.075(b) requires the First Claimant to have procedures in place for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome;
- 25.4.8 additionally, under subpart C of the Aerodromes Regulations, the First Claimant is required to maintain the surfaces of all movement areas with the objective of avoiding or eliminating any loose object/debris that might cause damage to aircraft or impair the operation of aircraft systems:
ADR.OPS.C.010(b)(1).
- 25.5 under section 30(1) of the Airports Act 1986, the Secretary of State may give to any airport operator or to airport operators generally such directions of a general character as appear to the Secretary of State to be necessary or expedient in the interests of national security or of relations with a country or territory outside the United Kingdom. Those directions cannot be disclosed if the Secretary of State has notified the operator that it must not disclose the direction but must be complied with;
- 25.6 there must be an airport security plan in force in relation to an airport at all times, which sets out the security measures which various persons are to take including the police, the National Crime Agency, the manager of the airport, any aircraft operators, any person occupying land in the airport and any people permitted to access the airport for business: section 24AE(1) and (4) of the Airport Security Act 1982;
- 25.7 equally, there is a power under the Airport Security Act 1982 for the Secretary of State to give a direction to the manager of an airport to use his best endeavours to secure that searches, of the airport, aircraft and any people or property which may be in the airport, as are specified in the direction are carried out by constables or by other persons of a description specified in the direction: section 13(1).

26. Airport operators may make byelaws pursuant to section 63 of the Airports Act 1986. The byelaws may include (but are not limited) to the following byelaws:-
- 26.1 for securing the safety of aircraft, vehicles and persons using the airport and preventing danger to the public arising from the use and operation of the airport;
- 26.2 for controlling the operation of aircraft within, or directly above, the airport for the purpose of limiting or mitigating the effect of noise, vibration and atmospheric pollution caused by aircraft using the airport;
- 26.3 for preventing obstruction within the airport;
- 26.4 for prohibiting or restricting access to any part of the airport;
- 26.5 for preserving order within the airport and preventing damage to property within it;
- 26.6 for requiring any person, if so requested by a constable or airport official, to leave the airport or any particular part of it, or to state his name and address and the purpose of his being within the airport; and
- 26.7 for restricting the area which is to be taken as constituting the airport for the purposes of the byelaws.
27. Anyone who visits airports (including employees and members of the public) is subject to the relevant byelaws. Section 64 of the Airports Act 1986 provides that any person contravening any byelaws made under section 63 commits a criminal offence in doing so and is liable on summary conviction to a fine, punishable with a maximum fine of £2,500.

SECTION 5: LEEDS BRADFORD AIRPORT BYELAWS

28. The First Claimant exercised the powers conferred on it by section 63 Airports Act 1986 and made the Leeds Bradford Airport Byelaws 2022 ("**the Leeds Bradford Airport Byelaws**"). They apply to an area outlined in red on Schedule 1 which shows the airport boundary.
29. A copy of the Leeds Bradford Airport Byelaws are attached to this statement at the **Exhibit** marked "**VJH1**"
30. In headline terms, the Leeds Bradford Airport Byelaws set out acts which are prohibited and others for which permission is required.
31. Para 3.15 of the Leeds Bradford Airport Byelaws provides:

"3.15 Persons required to leave

No person shall remain on the Airport, after having been requested by a Constable or an Airport Official to leave and no Constable or Airport Official shall request a person to leave unless that person is causing a disturbance (including using language or making

gestures which are lewd, foul or offensive) or has committed or is, in the reasonable opinion of the requesting Constable or Airport Official, about to commit an offence (including a breach of a byelaw). Nothing in this paragraph shall prejudice the operation of other byelaws pertaining to the removal or evacuation of persons from the Airport”.

32. Para 3.24 of the Leeds Bradford Airport Byelaws provides:

"3.24 No demonstrations etc

No person shall organise or take part in any demonstration, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the safety, comfort and convenience of passengers or persons using the Airport”.

33. Para 3.26 of the Leeds Bradford Airport Byelaws provides:

"3.26 Obstruction

No person shall intentionally obstruct or interfere with:

3.26.1 the proper use of the Airport or with any person acting in the execution of their duty in relation to the operation of the Airport; or

3.26.2 any other person in the proper use of the Airport”.

34. Other potentially relevant Leeds Bradford Airport Byelaws include the following:

34.1 **3.3 Tampering with Aircraft** *"No person shall tamper or interfere with any Aircraft or anything used in connection with any Aircraft”;*

34.2 **3.4 Boarding Aircraft** *"No person shall board any Aircraft without the authority of the Operator”;*

34.3 **3.7 Tampering with equipment** *"No person shall:*

3.7.1 interfere with, operate or in any way use any fixed or mobile equipment or plant or any other machinery or fittings, unless authorised to do so by the Airport Company;

3.7.2 tamper with or misuse any IT equipment or systems provided for managing, processing or displaying information at the Airport;

3.7.3 tamper with or misuse any escalator, traveller, lift, airbridge or any other automatic conveyance for passengers or other equipment or apparatus used in connection with the operation of the Airport or the control of persons or Vehicles to any part of the Airport”.

34.4 **3.16 Search** *"Any person (whether a bona fide airline passenger or not) who refuses to be searched or to have their baggage, Vehicle or other item under*

their control searched by a Constable or an Airport Official must leave the Airport if requested to leave by such Constable or Airport Official”.

- 34.5 **3.17 Persons not to return for 24 hours** *"No person, having left the Airport, at the request of a Constable or an Airport Official, shall re-enter the Airport, for a period of twenty-four hours thereafter except as a bona fide airline passenger unless re-entry is authorised in writing by the Constable or Airport Official issuing the original request to leave (or in their absence the Airport Company)".*
- 34.6 **3.25 No display of flags or banners etc** *"No person shall display any flags, banners or emblems likely to cause a breach of the peace on any part of the Airport”.*
- 34.7 **3.30 Loiter etc** *"No person shall enter or remain on the Airport without reasonable cause to do so”.*
- 34.8 **4.8 Prohibition notice** *"No person shall fail to comply with any Sign prohibiting or restricting access to any building, road or any part of the Airport”.*
- 34.9 **4.9 Climbing etc** *"No person shall climb any wall, fence, barrier, railing or post or breach any Restricted Area”.*
- 34.10 **4.13 Unauthorised areas** *"No person shall:*

 4.13.1 place any building, structure, equipment, Vehicle or container or any other item within three metres of any fence forming the boundary of a Restricted Area; or

 4.13.2 enter any part of the Airport to which members of the public are not for the time being admitted”.
- 34.11 **4.15 Driving airside** *"No person shall drive a Vehicle airside at the Airport elsewhere than in a place provided for the passage or accommodation of such Vehicle”.*
- 34.12 **4.22 Buildings and other structures** *"No person shall remove, displace, deface or alter any structure, building or other property (including any Sign), forming part of, or provided for or in connection with the Airport”.*
- 34.13 **5.2 Not to cause danger** *"No person shall:*

 5.2.1 use, cause or permit to be used, any Vehicle in such a way as to cause, or to be likely to cause, danger or nuisance to any Aircraft, person or property; or

 5.2.2 travel on foot on any of the Airport roads on which there is no designated footpath or pedestrian walkway”.
- 34.14 **5.4 Parking in prohibited areas** *"No person shall wait in, leave or park any Vehicle on any part of the Airport other than an area that is specifically designated by Sign for the parking of such a Vehicle and, for the avoidance of doubt, if an area is designated by Sign for parking by a certain category of person (including, for example, disabled persons or occupiers of certain Airport*

premises), no Vehicle other than one belonging to such a category of person may be parked in such an area”.

SECTION 6: ENFORCEMENT OF THE LEEDS BRADFORD AIRPORT BYELAWS

35. I am not aware of any instances of the Leeds Bradford Airport Byelaws needing to be enforced in respect of acts of protests at Leeds Bradford Airport.
36. I am aware that the Public Order Act 2023 has relatively recently come into force and that some of the acts of protests carried out at Leeds Bradford Airport might be capable of being prosecuted under that legislation (such as sections 1, 2 and 7).

SECTION 7: PROTESTS AT LEEDS BRADFORD AIRPORT

37. The expansion of Leeds Bradford Airport has been the subject of protestor activity over the last few years, and I have included a summary of these protests in the table below.

| | |
|----------------|---|
| June 2019 | XR protesters stood at the roundabout on the A654 and Whitehouse Lane protesting against a planned expansion to the airport. |
| September 2019 | XR protesters protested to Leeds City Councillors against a planned expansion to the airport. |
| January 2020 | XR protesters chained themselves to railings during a protest against a planned expansion to the airport. |
| August 2020 | XR protesters protested in Millennium Square in Leeds City Centre and GALBA (The Group For Action on Leeds Bradford Airport) cycled a route around Leeds, Bradford and Wakefield to highlight areas affected by sound pollution if the expansion plans were approved. |
| February 2021 | XR protesters threw fake ‘blood’ across the steps of Leeds Civic Hall after expansion plans were approved. |
| September 2021 | Medact Leeds, a group of healthcare workers which mobilise and campaign, protested close to the airport, calling on Leeds City Council to reverse their decision to expand the airport. |
| November 2021 | Stay Grounded UK, a group of airport opposition activists, protested as part of the Global Day of Action for Climate Justice. 10 airports were targeted, with the protest being against 12 airport expansion plans. GALBA joined the protest at Leeds Bradford Airport. Protestors also marched through Leeds City Centre. |

| | |
|---------------|---|
| February 2022 | XR protesters staged a mock funeral in Leeds City Centre, protesting against the airport expansion plans. |
| March 2022 | XR protesters protested outside Leeds Magistrate's Court following plans to expand the airport being withdrawn. |

38. Media articles relating to the protests at Leeds Bradford Airport are attached to this statement at the **Exhibit** marked **"VJH2"**.
39. It is the repeated targeting of Leeds Bradford Airport by XR protestors against the airport's previous expansions plans which makes the First Claimant apprehensive that its LBA:REGEN project (also an expansion project at Leeds Bradford Airport) may also attract protests (in addition to the matters referred to in the witness statement of Alexander Wright and the incidents referred to below in paragraph 41 where other airports were targeted by protesters).
40. Some of these protests have taken place on highways / access roads to Leeds Bradford Airport.

SECTION 8: PROTESTS AT OTHER AIRPORTS

41. I am aware of recent instances of environmental activists targeting UK airports including:

41.1 **2 June 2024: Farnborough Airport** – XR protesters protested at Farnborough Airport. Protesters released colourful smoke flares and chanted slogans at the three main gates.

41.2 **20 June 2024: London Stansted** – Two JSO protesters used an angle grinder to cut a hole in the perimeter fence and subsequently using a fire extinguisher to spray 2 aircraft with orange paint. A 25 second video of this incident was uploaded by JSO to X. I have included the URL for this video below:-

[Just Stop Oil on X: "🔥 JUST STOP OIL PAINT PRIVATE JETS HOURS AFTER TAYLOR SWIFT'S LANDS 🔥 Jennifer and Cole cut the fence into the private airfield at Stansted where @taylorswift13's jet is parked, demanding an emergency treaty to end fossil fuels by 2030. 🙋 Donate — https://t.co/UwALfVtRmR https://t.co/aORdvUuQmU" / X](https://t.co/UwALfVtRmR)
42. Media articles concerning the protests at Farnborough and London Stansted airports in June 2024 are attached to this statement at the **Exhibit** marked **"VJH3"**.

SECTION 9: DIRECT ACTION AT LEEDS BRADFORD AIRPORT

43. The witness statement of Alexander Wright sets out the background to JSO campaign of direct action targeting airports this summer. The First Claimant understands that JSO is planning large scale disruption to the aviation industry during the summer of 2024.

44. As explained above, Leeds Bradford Airport has been the subject of a number of previous protests by XR and other protest groups who have objected to the expansion of the airport. As explained at paragraph 12, the First Claimant began its £100 million regeneration project to expand the Leeds Bradford Airport in September 2023 to increase capacity from circa 4 million passengers a year to circa 7 million passengers. The First Claimant is therefore concerned that Leeds Bradford Airport could again be the subject of protest by XR (and/or other environmental activist groups – as they have previously (see paragraph 39 above)) and that, because of the JSO summer campaign, the protest might this time happen at the airport.
45. The First Claimant has previously agreed to permit protesters to use a designated area outside of the terminal front for a peaceful, planned protest subject to the protestors complying with instructions issued by the First Claimant. However, the First Claimant has not received any contact from protestors planning or intending to plan a protest at the airport, so it could not agree a similar arrangement (which might not, in any event, be possible).

SECTION 10: SECURITY AND HEALTH AND SAFETY

Security – Usual Arrangements at Leeds Bradford Airport

46. The First Claimant has strict security measures in place for all individuals (and vehicles) who seek to access airside. This can cover both passengers who are travelling through Leeds Bradford Airport to another destination, but also staff who work airside, and vehicles which are needed to operate or provide a service airside. Under the Aviation Security Act 1982 no one is permitted to access a security restricted area airside if they do not have the permission of the airport operator (which is subject to each person having undergone and passed these security checks).
47. In addition to the security checks, the First Claimant also operates:
- 47.1 bollards across the access road which leads to the terminal front;
 - 47.2 security gates blocking access to the goods yard. All goods going airside are passed through separate security scanners and are collected by staff who have already cleared security in order to be airside; and
 - 47.3 24-hour CCTV in operation across the airport estate with vehicle recognition cameras capturing vehicles accessing the car parks;
48. Each passenger must show their boarding pass in order to proceed to the security checks, and each staff member or contractor must have a valid airport ID card. Anyone who has a visitor or temporary pass must be escorted at all times.
49. I explain below the exceptional security measures that have been put in place by the First Claimant in anticipation of the forthcoming protests.

50. In 'normal' times, the security arrangements in place at Leeds Bradford Airport are those set out at paragraphs 46 to 48. These arrangements apply 24 hours a day.

Security – Enhanced Arrangements at Leeds Bradford Airport

51. The First Claimant recognises that it cannot simply expect the Police and the Courts to deal with the protest, and that it too must be proactive in mitigating the apprehended harm.

52. With that in mind, and in preparation and anticipation of the protest, the First Claimant has taken the following steps to try and mitigate the apprehended harm:-

52.1 implementing training:-

- 52.1.1 on dealing with a protest, working closely with West Yorkshire Police on 8 July 2024; and
- 52.1.2 for certain members of staff at Leeds Bradford Airport who in limited, time-critical, circumstances may intervene and arrest a protestor(s). This training is in the process of being arranged.

52.2 improving processes by:-

- 52.2.1 preparing a 'Leeds Bradford Airport Protests and Demonstration Management and Response' guidance note which is incorporated into Leeds Bradford Airport's Emergency plan and informs staff members how to deal with protests and the approach for serving a 'Breach Notice';
- 52.2.2 preparing Breach Notices to issue to protestors by an "Airport Official". The Breach Notice informs the protestor that they have breached the Leeds Bradford Airport Byelaws and requires them to vacate the Leeds Bradford Airport estate for a minimum period of 24 hours. A copy of the form of the Breach Notice is attached to this statement at the **Exhibit** marked "**VJH4**"; and
- 52.2.3 preparing an internal guidance note for those staff members trained to intervene in a protest (mentioned in para 52.1.2 above). This guidance note will be shared with the relevant individuals once they have received the training referred to.

52.3 liaising closely with West Yorkshire Police to ensure that everyone is in a state of readiness for the protest. In particular, I understand there have been and continue to be regular discussions between our Head of Security and West Yorkshire Police and that dedicated contacts and lines of communication have been established, and specialist Police protestor teams are on standby to attend the airport.

53. As well as these specific steps that have been taken, there have been many hours of meetings and planning for the protests taking place over the last few months, both internally at Leeds Bradford Airport and also with the Airport Operators Association and West Yorkshire Police. Key staff members of the First Claimant have been briefed as to what is expected to occur and, in so far as is possible, contingency plans for alternative working arrangements have been put in place. However, the nature of the First Claimant’s business is that operations very much rely on the free movement of vehicles, product and people into and out of the airport (including for aircrafts landing and taking off). There is little that can be done to mitigate the harm caused when that free movement is restricted.

Health & Safety

54. In view of the above statutory requirements, the First Claimant is responsible for the safety and security of our staff and passengers who use Leeds Bradford Airport as well as the smooth operation of scheduled flight activity at Leeds Bradford Airport.

55. There are a number of unusual features at Leeds Bradford Airport which make it an obvious target for protestors including environmental protestors. These include the following:-

- 55.1 the distance between the main terminal building and the runway is short;
- 55.2 there are no physical barriers between the main terminal building and the aircraft stands. Leeds Bradford Airport has one operational airbridge and most passengers will board their flight by walking directly to the aircraft and offload a flight by being bussed to the main terminal building;
- 55.3 the distance between Multiflight and the runway is short; and
- 55.4 the operation of Multiflight, which services private jets.

56. As we only have one operational airbridge, all other passenger movements between the terminal building and the aircraft stands (which involve crossing the access road which is used by multiple vehicles which service the airport) are carefully supervised by ground-staff.

57. The risks associated with any protest on the taxiway / runway include:-

- 57.1 protestors who are not being supervised by ground-staff will be unaware of many of the hazards associated with airports and the precise nature of the dangers (for example) of being too close to a jet engine. All ground staff are trained in airport health and safety issues;
- 57.2 fuel, which is flammable, for aircraft is stored (and supplied) in significant quantities as well as being carried on landing, departing and moving aircraft and is vulnerable to combustion and contamination;

- 57.3 a landing, departing or moving aircraft could easily injure a protestor and any evasive action may put others at risk of injury;
- 57.4 pilots engaged in landing, departing or moving aircraft will not be expecting protestors on or near the taxiway / runway and may have to take evasive action in an attempt to avoid injuring protestors (which action may put others at risk of injury);
- 57.5 all movements on the taxiway / runway are managed by air traffic control. Whilst air traffic control are able to communicate with pilots and ground-staff they would have no means of communicating with protestors;
- 57.6 drivers of vehicles on the access road between the gate house or terminal and the aircraft stands will not be expecting protestors on or near the access road and may have to take evasive action in an attempt to avoid injuring protestors (which action may put others at risk of injury); and
- 57.7 the emergency services and our own fire-fighting team may have to put themselves at risk in order to remove and / or rescue protestors. During a protest at London City Airport in October 2019, direct action organised by XR involved:-
 - 57.7.1 2 individuals climbing on top of the glass roof of the Main Terminal building; and
 - 57.7.2 1 individual climbing on (and gluing himself to) the top of an aircraft. The risks associated with falling from height include catastrophic injury and death.
- 57.8 Media articles concerning the protest at London City Airport in October 2019 are attached to this statement at the **Exhibit** marked **"VJH5"**.
- 58. All airports are a potential target for terrorist activity (which explains why the airport is routinely patrolled by police carrying firearms) meaning:-
 - 58.1 there is heightened security and any activity which is out of the normal is particularly dangerous. Any protest activity could be interpreted (whether correctly or not) by the security services at airports as a potential threat, meaning that the police or security services may intervene with significant knock-on effects. If the protestors pose no security or counter-terrorism threat, that would be a distraction for the police and our security team and a diversion of resources which are necessary for the counter-terrorism work they carry out to keep members of the public safe; and
 - 58.2 there is also always the potential that the protests are, or turn, violent or are, in fact, used as cover for actual terrorist attacks.

59. All of these risks are heightened at Leeds Bradford Airport given the unusual features of the airport described in paragraph 55.

SECTION 11: OPERATIONAL DISRUPTION AND FINANCIAL HARM

60. In addition to health and safety concerns, it is apprehended that a protest at Leeds Bradford Airport would result in financial harm, operational disruption and disruption and delay to members of the public.
61. The impact of protest activity at an airport is likely to be significant as they are places of high security and safety. For example:-
- 61.1 if protestors are on or near runways or taxiways (for example by gluing themselves to it), any departing or landing (or moving) aircraft would have to be halted until such time as the runways or taxiways were clear. That would also be true if, for example, there was the presence of material on the runway or taxiway which would or may interfere with (a) a safe landing or departure; and (b) the aircraft;
 - 61.2 that will inevitably cause delays to the operational schedule for departing and arriving aircraft;
 - 61.3 one flight being delayed in a modest fashion can cause a large impact to the departure and/or landing slots, meaning it can cause a number of other aircraft to depart or arrive later than scheduled;
 - 61.4 that in turn can have an impact on flight and cabin crew because the maximum amount of time that they can work for may elapse prior to completion of the scheduled flights without any alternative crew being available, as well as the possibility that aircraft are in the wrong location to be restaffed by the planned crew when necessary;
 - 61.5 as will be evident from that, delays at one airport can have a knock-on effect on other airports also. Additionally, where protestors are on or near the taxiway or runway, pilots engaged in landing may have to take evasive action and land elsewhere (which can, from time to time, be a matter of urgency in view of the fuel left in the aircraft), which puts pressure on other airports and results in passengers arriving at destinations which can be a considerable destination from their scheduled arrival destination; and
 - 61.6 similarly, a protest taking place onboard an aircraft is very likely to result in the aircraft having to make an emergency landing, given the counter-terror and safety risks even where the protest was 'peaceful'.
62. There is also a similar likelihood of the transportation of cargo being delayed where the aircraft is carrying cargo rather than passengers and the consequent impact on scheduling / other airports.

- 63. In light of that, airports are particularly vulnerable to peaceful protest.

- 64. If access onto the Leeds Bradford Airport site, access into the main terminal of Leeds Bradford Airport and/or access through the tunnel underneath Leeds Bradford Airport’s runway (through which the A658 runs) is blocked, operational harm to the First Claimant may include:
 - 64.1 staff being unable to gain access to the main terminal. Without minimum staff, Leeds Bradford Airport cannot operate and may be closed.
 - 64.1.1 If security staff are prevented from access, security checks cannot be completed meaning customers cannot be processed to the departure lounge for boarding and so customers may miss their flight.
 - 64.1.2 If operational staff are prevented from access, flights will be unable to take off and/or land and so may be cancelled.
 - 64.1.3 If business partner staff are prevented from access, concessions may be unable to trade, aircraft may not be refuelled prior to take-off, aircraft may not be restocked prior to take-off.
 - 64.2 customers being prevented from accessing the main terminal and so unable to make their flight.

- 65. If there is protest at Leeds Bradford Airport, the First Claimant will also suffer financial harm as follows:-
 - 65.1 the First Claimant forecasts that during July and August 2024 it will process around 1 million customers. If it cannot operate, the First Claimant will still incur its usual costs but will lose revenue;
 - 65.2 the First Claimant may also be subject to customer complaints if customers cannot gain access, and it may be required to reimburse customers for their inability to use pre-booked services such as meet and greet, car parking, Fast Track or Lounge access. The loss for the First Claimant could be in the region of £67,500 per day from refunded customer bookings; and
 - 65.3 The First Claimant has service level agreements in place with a number of its airlines, and any delays to departures could result in a ‘penalty’ charge.

- 66. If protestors access the airfield, operational harm to the First Claimant may be caused by:-
 - 66.1 protestors trying to or successfully blocking or attaching themselves to the runway, preventing aircraft from taking off or landing, and depending how long

- the incident is ongoing could result in Leeds Bradford Airport being closed and flights cancelled or diverted;
- 66.2 protestors trying to or successfully blocking or attaching themselves to the taxiway(s);
- 66.3 in the event protestors block one taxiway, Leeds Bradford Airport does have alternative taxiways it could use for aircrafts to access the runway, but this may result in delays to departures and arrivals;
- 66.4 in the event protestors block all eight taxiways, this would prevent aircraft from taking off or offloading their passengers after landing. Alternatively, flights or passengers may be diverted to alternative airports; and
- 66.5 protestors may attach themselves to the First Claimant’s property and cause damage.
67. In addition, at any one time, valuable equipment, goods and aircraft will be located within the airport. Aeroplanes are also highly complex pieces of engineering and, if any debris/materials accidentally or deliberately make their way into their engine (or any other part), severe damage to the aircraft could be caused and would necessarily mean a flight would have to be cancelled or delayed because that aircraft would be grounded until the issue could be investigated fully and either fixed or another aircraft made available.
68. In short, the financial loss could be enormous, and not easily compensated with an award of damages. The Defendants are also a class of unknown individuals.
69. The harm referred to may also extend to third parties: the First Claimant’s business partners and the general public. For example, obstruction of the access / entries into the airport by protest action will prevent access by tankers, HGVs and other vehicles associated with operations at Leeds Bradford Airport which will likely lead to traffic on the surrounding highways and (in the worst case scenario) closure of the highway known as A658.
70. Surrounding villages and roads will suffer significant disruption as a result of such traffic diversion and increased flow of traffic.
71. I anticipate that the First Claimant will need to be assisted by a presence from West Yorkshire Police throughout these protests - especially if protestors are gluing themselves to the runway. This will be a drain on police resources and, depending on the scale of the protest and the severity of the activity, could be a significant drain.

SECTION 12: APPREHENSION OF FUTURE PROTESTS AND HARM

- 72. On the basis of the information that I have outlined above, the First Claimant reasonably apprehends that Leeds Bradford Airport will be a target of unlawful protest activities during the summer of 2024.
- 73. Further, and in the context set out above, it is reasonably apprehended that the tactics and strategies deployed by the protestors during this apprehended period of protest will mirror those being deployed already by JSO, XR and Last Generation. Those tactics include protestors accessing critical parts of the airport (including airside), trespass, damage to property, and obstructing access to the taxiways and runway.
- 74. Finally, I would highlight that the stated aims of JSO are to disrupt the airports. The repeated threat is that airports will be targeted and the recent protest at London Stansted shows that JSO are following through on this threat.

SECTION 13: THE BALANCE OF CONVENIENCE / COMPELLING JUSTIFICATION

- 75. The First Claimant considers that:
 - 75.1 unless an injunction is granted, there is a serious risk of disruption at Leeds Bradford Airport this summer. Based on the action at London Stansted and the previous protests at Leeds Bradford Airport, it is very unlikely that JSO or XR will make a public announcement concerning the location, time / date of its protest;
 - 75.2 Leeds Bradford Airport is an obvious target for protestors given that it has been the subject of protests previously with its plans to expand the airport and given the factors referred to above;
 - 75.3 damages would not be an adequate remedy for Leeds Bradford Airport for the reasons set out in this witness statement;
 - 75.4 since the remedy which the First Claimant seeks is only to prevent unlawful activity, there is no question of anyone in the class of Persons Unknown suffering any actionable loss or needing compensation in damages; and
 - 75.5 the grant of an injunction to restrain disruption would provide an effective deterrent for activists who might otherwise contemplate direct action (given that the breach of an injunction would carry the risk of imprisonment for contempt of court). The First Claimant has considered whether it might enforce any breaches of the byelaws by way of criminal prosecutions. As I say above, so far as I am aware the First Claimant is not aware of that having been done before so has never carried out a prosecution of the byelaws. While it might be possible to do so, there may be additional complexities and delays associated with prosecutions started by it (for example, the Director of Public Prosecutions could take over the prosecutions at any stage under section 6(2) of the

Prosecution of Offences Act 1985 and may do so potentially to discontinue them). I am conscious that any prosecutions would have to occur after protests had occurred at Leeds Bradford Airport by which time the serious impact on the airport, in the forms I identify above, would already have occurred.

76. In light of the credible threat of this apprehended protest activity, the historic events of protest at Leeds Bradford Airport and other airports, and the harm that would be caused if an unlawful protest came to pass, it is respectfully asked that the Court grant the injunctive relief that is set out in the draft orders that accompanies this claim.
77. I am aware that the following airport operators obtained injunctions against the threat of protests by JSO (and XR in the case of the Manchester Airport Groups):-

77.1 on 20 June 2024, London City Airport obtained an injunction for a 5 year period (subject to annual reviews by the Court);

77.2 on 5 July 2024, Manchester Airport Group ("MAG") obtained injunctions in respect of Manchester Airport, Stansted and East Midlands to be renewed on a yearly basis; and

77.3 on 9 July 2024, Heathrow Airport obtained an injunction for a 5 year period (subject to annual reviews by the Court).

SECTION 14: CROSS-UNDERTAKING IN DAMAGES

78. Although I cannot foresee any way in which anyone affected by the injunction could suffer loss or damage, I am authorised on behalf of the First Claimant to provide the necessary cross-undertaking to pay any sum which the Court considers appropriate to compensate anyone affected by the proposed injunction to restrain unlawful activity at Leeds Borough Airport if it is subsequently determined that the First Claimant is not entitled to the order which it seeks.
79. The audited accounts for the First Claimant for the year ending 31 March 2023 show the following:-

| Revenue for the year ending 31.03.23 | Profit for the year ending 31.03.23 | Balance Sheet as at 31.03.23 |
|--------------------------------------|-------------------------------------|------------------------------|
| £43,828,000 | £3,292,000 | £87,111,000 |

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 behalf of the First Claimant.

DocuSigned by:

CA7F27B00438424

VINCENT JOHN HODDER | Dated this 15th day of July 2024

IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
B E T W E E N

- (1) LEEDS BRADFORD AIRPORT LIMITED
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
- (4) NIAL SERVICES LIMITED

Claimants

-and-

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 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 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 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

VJH1

This is the exhibit marked “VJH1” referred to in the witness statement of Vincent John Hodder.



Leeds Bradford[®]
Yorkshire's Airport

Leeds Bradford Airport

Byelaws 2022



Leeds Bradford Airport Byelaws 2022

Leeds Bradford Airport Limited in exercise of the powers conferred on it by sections 63 and 64 of the Airports Act 1986 and of all other powers enabling it in that behalf, hereby makes the following byelaws which shall apply within Leeds Bradford Airport:-

1. INTERPRETATION

1.1 In these byelaws:-

“Accident” means an unintended occurrence which has an adverse physical result;

“Aircraft” means any heavier than air power driven flying machine;

“Airport” means the aerodrome known as Leeds Bradford Airport as set out inside the red line on the plan attached at Schedule 1;

“Airport Car Parks” means together the Short Stay Car Park, the Premium Short Stay Car Park, the Free 1 Hour Zone Car Park, the Mid Stay Car Park, the Long Stay Car Park, the Viking Airport Parking Car Park, the Express Car Park, the Meet & Greet Car Park and all other car parking areas and associated road networks operated by the Airport Company from time to time;

“Airport Company” means Leeds Bradford Airport Limited and, where the context so requires, references in these byelaws to the Airport Company, shall include a reference to any group undertaking (as defined in section 1161 of the Companies Act 2006) of the Airport Company and to any person engaged (whether by employment or otherwise) by the Airport Company or any group undertaking of the Airport Company;

“Airport Official” means a person authorised in writing by the Airport Company to perform specified functions under these byelaws;

“Animal” means any animal, wild or domesticated, that is present within or has been brought onto the Airport except in byelaw 9.3 where it has the same meaning as in section 170(8) of the Road Traffic Act 1988;

“Competence to Drive” means written authority issued to a person by their current employer which authorises that person to drive and operate a particular class of Vehicle;

“Constable” means any person having the powers and privileges of a constable, a traffic police community support officer or a police community support officer;

“Customs and Excise Acts” has the same meaning as in the Customs and Excise Management Act 1979;

“Dangerously” has the same meaning as in section 2A of the Road Traffic Act 1988;

“Drunk” means the person is so affected by alcohol as to be losing control of their faculties and or behaviour;

Leeds Bradford Airport Byelaws 2022

“Groundhandling” has the same meaning as in the Airports (Groundhandling) Regulations 1997;

“Law Enforcement Agency” means the National Crime Agency, UK Border Force, Her Majesty’s Revenue and Customs and any other UK government law enforcement agency in each case where acting within their statutory authority;

“Lost Property Office” means any building or part of a building at the Airport which has been designated by the Airport Company as such;

“Operator” in relation to any Aircraft means the person who at the relevant time has responsibility for management of the Aircraft;

“Portable Music Machine” means a portable radio, MP3 player, compact disc player, television, computer games machine, mobile telephone, tablet or any other device capable of emitting noise;

“Prescribed Limit” has the same meaning as in section 11 of the Road Traffic Act 1988;

“Private Hire Vehicle” means a Vehicle, other than a Taxi or Public Service Vehicle, which is used for the purpose of carrying passengers for hire or reward;

“Public Service Vehicle” has the same meaning as in section 1 of the Public Passenger Vehicles Act 1981;

“Restricted Area” means that part of the Airport lying within the perimeter fence to which access is controlled by security check points and any other authorised entry point and including all stands, aprons, taxiways and the runway;

“Road Traffic Enactments” has the meaning given in section 63(3) of the Airports Act 1986;

“Security Search Area” means any area on the Airport used by an Airport Official for security checks, passenger/staff screening or other security purposes;

“Sign” means any object or device (whether fixed or portable) for conveying warnings, information, requirements, restrictions or prohibitions of any description;

“Taxi” means a hackney carriage licensed under section 37 of the Town Police Clauses Act 1847;

“Terminal Building” means that building or buildings at the Airport used as a terminal or terminals for passengers arriving at or departing from the Airport;

“Vehicle” means any mechanically propelled conveyance or manually operated apparatus on wheels and includes trailers, items of plant that operate as wheeled vehicles and as static apparatus but does not include an Aircraft or passenger baggage.

1.2 These byelaws may be cited as the Leeds Bradford Airport Byelaws, 2022.

Leeds Bradford Airport Byelaws 2022

- 1.3** No provision in these byelaws shall apply to any member of a fire, police or ambulance service or other Law Enforcement Agency who is acting in the course of duty, or to any emergency Vehicles or Animals being used by such person.

2. PENALTIES

2.1 Applicable fines

Any person contravening any of the following byelaws or anyone assisting or procuring others to do so shall be liable on summary conviction to a fine which, in respect of a contravention of:

2.1.1 Byelaws 3.34 and 4.21 shall not exceed level 2 on the standard scale.

2.1.2 Byelaws 3.3, 3.4, 3.6, 3.9.1, 3.10, 3.11, 3.12, 4.1, 4.2, 4.3, 4.6, 4.7, 4.13, 4.16, 5.1.1, 5.1.2, 5.1.3, 5.1.4, 5.1.7, 5.8, 5.9, 5.15, 6.2 and 7.1 shall not exceed level 4 on the standard scale.

2.1.3 Any other byelaw shall not exceed level 3 on the standard scale.¹

3. PROHIBITED ACTS

3.1 Aircraft parking

Except in the case of emergency, no person shall place an Aircraft other than in the place and position allocated from time to time for that Aircraft by the Airport Company.

3.2 Securing Aircraft

No person shall fail to secure any stationary Aircraft against movement or against unauthorised entry into it or tampering with it.

3.3 Tampering with Aircraft

No person shall tamper or interfere with any Aircraft or anything used in connection with any Aircraft.

3.4 Boarding Aircraft

No person shall board any Aircraft without the authority of the Operator.

3.5 Emergency stop switch etc

¹ As at the date of these byelaws the relevant levels of the standard scale, by virtue of section 122 of the Sentencing Act 2020, are as follows: Level 2 - £500, Level 3 - £1,000 and Level 4 - £2,500.

Leeds Bradford Airport Byelaws 2022

Except in the case of emergency, no person shall intentionally tamper or interfere with, misuse or operate any fuel hydrant emergency stop switch or any switch or lever of any escalator, traveller, tracked transit system, lift or any other automatic conveyance for passengers upon or near to which a Sign is displayed which states that it is only intended to be operated in case of emergency.

3.6 Misuse of communications equipment

Without reasonable excuse, no person shall tamper with or misuse any communications equipment or other apparatus provided for transmitting and receiving messages or data at the Airport.

3.7 Tampering with equipment

No person shall:

- 3.7.1 interfere with, operate or in any way use any fixed or mobile equipment or plant or any other machinery or fittings, unless authorised to do so by the Airport Company;
- 3.7.2 tamper with or misuse any IT equipment or systems provided for managing, processing or displaying information at the Airport;
- 3.7.3 tamper with or misuse any escalator, traveller, lift, airbridge or any other automatic conveyance for passengers or other equipment or apparatus used in connection with the operation of the Airport or the control of persons or Vehicles to any part of the Airport.

3.8 Failure to report damage

No person shall, without reasonable excuse, fail to report damage howsoever caused to an Aircraft or apparatus or equipment, including, without limitation, barriers in Airport Car Parks, to a person having charge of it or its owner or an Airport Official.

3.9 No smoking

No person shall smoke, use e-cigarettes or bring a naked light into or light any naked light in:-

- 3.9.1 Any place where any such act is prohibited by a Sign; or
- 3.9.2 Any place other than a place or places specifically designated by Sign for that purpose; or
- 3.9.3 Any enclosed place located at the Airport; or
- 3.9.4 Any part of a Restricted Area unless in a designated smoking area.

3.10 Radio interference

Leeds Bradford Airport Byelaws 2022

No person shall operate or use any radio transmitter or other thing capable of radiating electrical interference in such a way as to adversely affect or that it is likely to adversely affect the operation of any communications, navigation or other systems at the Airport or an Aircraft present there.

3.11 False alarms

No person shall knowingly by any means give a false bomb warning or a false fire, ambulance or other emergency alarm or otherwise deliberately or recklessly trigger a manual call button resulting in an alarm being sounded.

3.12 Unattended baggage

No person shall leave any baggage or other item unattended anywhere within the Airport.

3.13 Allow anything on Airport where forbidden

No person shall allow any Vehicle, Animal or thing to remain on the Airport (having been given a reasonable period to remove it), after its presence on the Airport has been forbidden by a Constable or an Airport Official who has reasonable grounds to believe that its presence has been responsible for or is about to be responsible for a breach of a byelaw or for a criminal offence.

3.14 Not to return

No person shall allow any Vehicle, Animal or thing to be on the Airport after having been required by a Constable or an Airport Official to remove it and no person after having complied with this requirement shall allow that Vehicle, Animal or thing to re-enter the Airport, unless re-entry has been approved by a Constable or Airport Official.

3.15 Persons required to leave

No person shall remain on the Airport, after having been requested by a Constable or an Airport Official to leave and no Constable or Airport Official shall request a person to leave unless that person is causing a disturbance (including using language or making gestures which are lewd, foul or offensive) or has committed or is, in the reasonable opinion of the requesting Constable or Airport Official, about to commit an offence (including a breach of a byelaw). Nothing in this paragraph shall prejudice the operation of other byelaws pertaining to the removal or evacuation of persons from the Airport.

3.16 Search

Any person (whether a bona fide airline passenger or not) who refuses to be searched or to have their baggage, Vehicle or other item under their control searched by a Constable or an Airport Official must leave the Airport if requested to leave by such Constable or Airport Official.

Leeds Bradford Airport Byelaws 2022

3.17 Persons not to return for 24 hours

No person, having left the Airport, at the request of a Constable or an Airport Official, shall re-enter the Airport, for a period of twenty-four hours thereafter except as a bona fide airline passenger unless re-entry is authorised in writing by the Constable or Airport Official issuing the original request to leave (or in their absence the Airport Company).

3.18 Prohibited persons

No person shall enter the Airport whilst having been prohibited in writing from entering by the Airport Company.

3.19 Persons to keep Animals under control

No person shall:

- 3.19.1 fail to keep any Animal under control or permit any Animal to foul any footpath or building provided that in proceedings for an offence against this byelaw it shall be a defence for the person charged to prove that they took all reasonable precautions and exercised all due diligence to avoid the commission of the offence; and
- 3.19.2 allow any Animal to enter the Terminal Building except for an assistance Animal or in any other situation where the Airport Company has granted written permission.

3.20 Drunk etc

No person shall be Drunk or under the influence of drugs or other intoxicating substances whilst on Airport property and where a Constable or an Airport Official reasonably believes a person to be Drunk or under the influence of drugs or other intoxicating substances, that person shall not carry on consuming alcohol or using drugs or other intoxicating substances in breach of a direction from that Constable or Airport Official and shall not fail to surrender any alcohol (whether or not in a sealed container), drugs or other intoxicating substances on request to such Constable or Airport Official.

3.21 Consumption of alcohol

No person shall consume alcohol or be in possession of any open alcohol container on Airport property, except in restaurant and bar areas where the alcohol has been purchased.

3.22 Control of alcohol

No person shall:

- 3.22.1 sell, or attempt to sell, alcohol to a person who is Drunk;
- 3.22.2 allow alcohol to be sold to a person who is Drunk;

Leeds Bradford Airport Byelaws 2022

- 3.22.3 knowingly obtain, or attempt to obtain, alcohol for consumption by a person who is Drunk;
- 3.22.4 sell alcohol to a person under the age of 18; or
- 3.22.5 obtain, or attempt to obtain, alcohol for consumption by a person under the age of 18.

3.23 Spitting etc

No person shall spit on the floor, side or wall of any Vehicle or passenger transit system, or in any building, or on any pavement within the Airport, or deposit any chewing gum other than in a suitable bin.

3.24 No demonstrations etc

No person shall organise or take part in any demonstration, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the safety, comfort and convenience of passengers or persons using the Airport.

3.25 No display of flags or banners etc

No person shall display any flags, banners or emblems likely to cause a breach of the peace on any part of the Airport.

3.26 Obstruction

No person shall intentionally obstruct or interfere with:

- 3.26.1 the proper use of the Airport or with any person acting in the execution of their duty in relation to the operation of the Airport; or
- 3.26.2 any other person in the proper use of the Airport.

3.27 Litter and pollution

No person shall:

- 3.27.1 leave uncovered refuse containers on any part of the Airport or drop, leave, throw or otherwise deposit anything where doing so would or might cause, contribute to, or (tend to) lead to damage to property (including Aircraft) or injury to person or to the defacement by litter, pollution or waste substances of any part of the Airport; or
- 3.27.2 drop or leave litter or refuse on the Airport except in a receptacle provided for that particular type of litter or refuse; or

Leeds Bradford Airport Byelaws 2022

3.27.3 drop, leave, throw or otherwise deposit food waste that might attract wildlife;
or

3.27.4 drop, leave, throw or otherwise deposit cigarette waste except in a receptacle
provided for the purpose.

3.28 Not to remove baggage trolleys or wheelchairs

No person shall remove from the Airport any baggage trolley or wheelchair provided for
passenger use.

3.29 Misuse of baggage trolleys or wheelchairs

No person shall misuse any baggage trolley or wheelchair provided for passenger use.

3.30 Loiter etc

No person shall enter or remain on the Airport without reasonable cause to do so.

3.31 Emergency exits

No person shall obstruct or interfere with any of the emergency exits at the Airport.

3.32 Evacuation

Without reasonable excuse, no person shall in an emergency or upon hearing an alarm
requiring persons to evacuate, fail to evacuate or remain in any building or place on the
Airport when instructed to do so by a Constable, a member of the fire service or an
Airport Official.

3.33 Private Hire Vehicles

No person shall cause or permit a Private Hire Vehicle (except a Private Hire Vehicle
authorised in writing by the Airport Company):

3.33.1 to enter the Airport for the purpose of loading passengers unless that Private
Hire Vehicle has been pre-booked; or

3.33.2 to load passengers at the Airport other than in one of the Airport Car Parks and
only where such Private Hire Vehicle has been pre-booked by such passengers.

3.34 Fail to comply with Signs etc

No person whether on foot or whilst driving or propelling a Vehicle shall neglect, fail or
refuse to comply with an indication or direction given by a Constable or an Airport
Official or Sign exhibited by or on behalf of the Airport Company.

3.35 Abandonment of Vehicles

Leeds Bradford Airport Byelaws 2022

No person shall abandon any Vehicle on any part of the Airport to which the Road Traffic Enactments do not apply. A Vehicle will be deemed to be abandoned if:

- 3.35.1 It is found on the Airport without a valid and current pre-booked parking arrangement and it has remained static for more than 30 days; or
- 3.35.2 Enquiries are conducted with the Police and the registered keeper and/or registered address cannot be established; or
- 3.35.3 Enquiries are conducted with the Police and it is found that:
 - (a) The Vehicle is fitted with false registration plates; or
 - (b) The Vehicle does not have a valid vehicle registration.

3.36 Skateboards / roller skates etc

No person shall use skateboards, roller skates, quad bikes, scooters (whether micro, electric or propelled), segways or similar modes of transport anywhere on the Airport except bona fide scooters or wheelchairs for and used by disabled persons.

3.37 Size restrictors

No person shall drive under or through a height or width restrictor in a Vehicle which exceeds the maximum height or width stated on the applicable Sign.

3.38 Soilage

No person shall urinate or defecate at the Airport other than in toilets provided by, or with the permission of, the Airport Company.

4. ACTS FOR WHICH PERMISSION IS REQUIRED

The following acts are prohibited unless the written permission of the Airport Company has first been obtained or unless the act is performed by a person acting with lawful authority or reasonable cause or excuse:-

4.1 Groundhandling

No person shall carry out Groundhandling at the Airport.

4.2 Aircraft engine running

No person shall run an Aircraft engine in a hangar or in an area other than that allocated from time to time for that purpose by the Airport Company.

4.3 Cleaning etc of Aircraft and Vehicles

Leeds Bradford Airport Byelaws 2022

No person shall clean, service or maintain Aircraft, Vehicles or equipment in areas where such activities are prohibited by any Sign or other written notice from the Airport Company.

4.4 Taking Vehicles into hangers

No person shall take any Vehicle into a hanger used for the maintenance or storage of Aircraft.

4.5 Fires

No person shall, by any act or omission, cause or permit a fire to occur except in a place constructed for that purpose.

4.6 Refuelling

No person shall fill or discharge from any container, including any part of a Vehicle, liquid fuel in any place that is not approved for that purpose by the Airport Company.

4.7 Discharging deleterious matter

No person shall cause or permit the discharge of hydrocarbon (whether in the form of grease, oil, fuel or spirit) or other deleterious matter (whether of a solid, liquid or gaseous nature) including, without limitation, de-icer or any other substance of whatever nature which might obstruct or be or become a source of damage to drains, sewers or other areas or infrastructure or which may constitute a risk to the environment including, without limitation, ground water or public health.

4.8 Prohibition notice

No person shall fail to comply with any Sign prohibiting or restricting access to any building, road or any part of the Airport.

4.9 Climbing etc

No person shall climb any wall, fence, barrier, railing or post or breach any Restricted Area.

4.10 Not to cause annoyance

No person shall sing, dance, shout, play a musical instrument, operate a Portable Music Machine, operate any portable entertainment or public address equipment or otherwise behave in such a way as to give reasonable cause for annoyance to any other person.

4.11 Apparatus etc

No person shall erect or use any apparatus for transmission, receipt, recording, reproduction or amplification of sound, speech or images for:

Leeds Bradford Airport Byelaws 2022

4.11.1 commercial purposes; or

4.11.2 any purpose in a Security Search Area or other operationally sensitive area.

4.12 Animal grazing

No person shall graze Animals on Airport land.

4.13 Unauthorised areas

No person shall:

4.13.1 place any building, structure, equipment, Vehicle or container or any other item within three metres of any fence forming the boundary of a Restricted Area; or

4.13.2 enter any part of the Airport to which members of the public are not for the time being admitted.

4.14 Entering or leaving the Airport

No person shall enter or leave the Airport otherwise than through a gate or entrance or exit for the time being provided by the Airport Company for that purpose.

4.15 Driving airside

No person shall drive a Vehicle airside at the Airport elsewhere than in a place provided for the passage or accommodation of such Vehicle.

4.16 Offer of service

No person shall sell or distribute anything, offer anything for sale or hire or make any offer of services for reward.

4.17 Taxi touting

No person shall, anywhere on the Airport, offer their or any other Vehicle for hire or perform any other services in relation to the supply or hire of such a Vehicle (save for the loading of passengers in Airport Car Parks by Taxis and pre-booked Private Hire Vehicles in compliance with the remaining provisions of these byelaws).

4.18 Display signs

No person shall post, distribute or display signs, advertisements, circulars or other printed or written matter.

4.19 Begging

No person shall beg or solicit funds or contributions of any kind.

Leeds Bradford Airport Byelaws 2022

4.20 Gaming

No person shall engage or agree to engage, in bookmaking, gaming, betting or wagering nor pay, receive, or settle bets with any other person.

4.21 Wearing of passes

No person shall fail to wear a pass issued to them by or on behalf of the Airport Company so that it is reasonably visible at all times.

4.22 Buildings and other structures

No person shall remove, displace, deface or alter any structure, building or other property (including any Sign), forming part of, or provided for or in connection with the Airport.

5. PROHIBITED ACTS ON PARTS OF THE AIRPORT TO WHICH THE ROAD TRAFFIC ENACTMENTS DO NOT APPLY

The following acts are prohibited on any part of the Airport to which the Road Traffic Enactments do not apply:-

5.1 Driving offences

No person shall drive a Vehicle:

- 5.1.1 Dangerously; or
- 5.1.2 Without due care and attention, or without reasonable consideration for other persons, or in a way which inconveniences other persons using the Airport; or
- 5.1.3 Whilst holding a mobile telephone or other handheld device; or
- 5.1.4 Whilst over the Prescribed Limit or under the influence of drugs or other intoxicating substances; or
- 5.1.5 Without prejudice to any notice from the Airport Company from time to time, at a speed in excess of 10 miles an hour on the Airport's apron or roads or in excess of such other speed limit indicated by a Sign erected in a conspicuous or appropriate position or by a Sign which conforms to the Traffic Signs Regulations and General Directions 2016, which speed shall not in any event be more than 20 miles per hour except in an emergency. Constables and Airport Officials may use speed cameras to monitor the speed at which Vehicles are travelling; or
- 5.1.6 Without wearing a seatbelt, and it is the responsibility of the driver of the Vehicle to ensure any passengers also adhere to this requirement, save in either case where the driver or passenger would be exempt from the requirement to

Leeds Bradford Airport Byelaws 2022

wear a seatbelt if the Vehicle were to be driven on a road to which the Road Traffic Enactments apply; or

- 5.1.7 The wrong way down a one-way road; or
- 5.1.8 Without a current full driving licence that is valid in the UK and appropriate for the type of Vehicle being driven together with any valid driving permit issued by the Airport Company authorizing the holder to drive on the Airport or in any specified part of it; or
- 5.1.9 So as to tailgate or otherwise drive too closely behind another Vehicle so as to not leave sufficient distance to stop without causing a collision if the Vehicle in front stops suddenly.

5.2 Not to cause danger

No person shall:

- 5.2.1 use, cause or permit to be used, any Vehicle in such a way as to cause, or to be likely to cause, danger or nuisance to any Aircraft, person or property; or
- 5.2.2 travel on foot on any of the Airport roads on which there is no designated footpath or pedestrian walkway.

5.3 Obstruction

Except in an emergency, no person shall leave or park a Vehicle or cause it to wait for a period in excess of the permitted time in an area where the period of waiting is restricted by a Sign.

5.4 Parking in prohibited areas

No person shall wait in, leave or park any Vehicle on any part of the Airport other than an area that is specifically designated by Sign for the parking of such a Vehicle and, for the avoidance of doubt, if an area is designated by Sign for parking by a certain category of person (including, for example, disabled persons or occupiers of certain Airport premises), no Vehicle other than one belonging to such a category of person may be parked in such an area.

5.5 Obstruction causing danger

No person in charge of a Vehicle shall cause or permit the Vehicle to stand so as to cause any obstruction, or so as to be likely to cause danger to Aircraft, person or property.

5.6 Fail to set handbrake etc

No person shall cause or permit any Vehicle to be left unattended unless any parking brake or restraining device with which the Vehicle is equipped is properly engaged.

Leeds Bradford Airport Byelaws 2022

5.7 Use of Vehicles

No person shall use, cause or permit to be used any Vehicle which fails to comply with any braking, steering, lighting, tyre or electrical requirements which apply to that type of Vehicle if it were to be operated on a road to which the Road Traffic Enactments apply or use, cause or permit to be used any Vehicle where the safety locking devices are not in good working order.

5.8 Fuel and exhaust systems

No person shall use, cause or permit to be used any Vehicle unless the condition of the fuel and exhaust systems is at all times such that no danger or nuisance is caused or is likely to be caused to any person or property.

5.9 Passenger safety and insecure load

No person shall use, cause or permit to be used:-

- 5.9.1 Any Vehicle unless such Vehicle, and all parts and accessories of such Vehicle are at all times in such condition, and the number of passengers carried by such Vehicle, the manner in which any passengers are carried in or on such Vehicle, and the weight, distribution, packing and adjustment of the load of such Vehicle are such that no danger is caused or is likely to be caused to any person in or on such Vehicle or the Airport; or
- 5.9.2 Any Vehicle unless the load carried by such Vehicle is at all times so secured, if necessary by physical restraint other than its own weight, and is in such a position that neither danger nor nuisance is caused or is likely to be caused to any person or property by reason of the load or any part thereof falling or being blown from such Vehicle, or by reason of any other movement of the load or any part thereof in relation to such Vehicle.

5.10 Designated areas

No person shall:

- 5.10.1 Without permission of the Airport Company or reasonable excuse, use, drive, park, wait in or leave any Vehicle otherwise than in the area designated by the Airport Company; or
- 5.10.2 Wait in, leave or park a Vehicle outwith a designated parking bay.

5.11 Stopping when requested to do so

No person shall fail to stop when required by a Constable or an Airport Official.

5.12 Following directions etc

Leeds Bradford Airport Byelaws 2022

No person shall fail to comply with any direction for the regulation of traffic given by a Constable, an Airport Official or any Sign. In the case of an Airport Official, they may give such direction for the purpose of ensuring compliance with these byelaws, the criminal law or regulatory requirements or for the safe and efficient management of the Airport.

5.13 Request for removal of Vehicle

No person shall when in charge of a Vehicle, fail to remove it from any parking place when directed to do so by a Constable or an Airport Official.

5.14 Leaving Vehicles unattended

No person shall leave any Vehicle either:

5.14.1 Unattended when its engine is running; or

5.14.2 With a removable ignition key unattended when the ignition key is in the Vehicle.

5.15 Permitted areas for Vehicles

Except in an emergency or other circumstances where permission has been obtained from the Airport Company, no person shall cause or permit Vehicles, or Aircraft servicing equipment or persons to enter those parts of the Airport certified for the surface movement of Aircraft including the manoeuvring area, aprons and any part of the Airport provided for the maintenance of Aircraft except those parts specifically allocated from time to time by the Airport Company for use by Vehicles, Aircraft servicing equipment or persons.

5.16 Observe Signs

No person shall without reasonable excuse when on foot or whilst using, driving or propelling a Vehicle, neglect, fail or refuse to comply with an indication or direction given by:-

5.16.1 A Sign erected and displayed by or with the consent of the Airport Company, placed on or near a private Airport road;

5.16.2 Any road marking on such a road; or

5.16.3 An Airport Official or a Constable for the time being engaged in the regulation of traffic or pedestrians.

6. ACTS FOR WHICH PERMISSION IS REQUIRED ON PARTS OF THE AIRPORT TO WHICH THE ROAD TRAFFIC ENACTMENTS DO NOT APPLY

The following acts are prohibited on any part of the Airport to which the Road Traffic Enactments do not apply unless the written permission of the Airport Company has first

Leeds Bradford Airport Byelaws 2022

been obtained or unless the act is performed by a person with lawful authority or excuse:-

6.1 Drive or place Vehicle

No person shall drive, operate or place a Vehicle elsewhere than in a place provided for the passage or accommodation of such a Vehicle.

6.2 Lights on Vehicles

No person shall drive or leave any Vehicle which does not comply with any of the lighting requirements which apply on those parts of the Airport to which the Road Traffic Enactments apply.

6.3 Parking

No person shall leave any cargo or baggage or park any Vehicle or equipment elsewhere than in a place provided by the Airport Company for the accommodation of such cargo or baggage or the parking of such Vehicle or equipment.

7. TAXIS AND PRIVATE HIRE VEHICLES

7.1 Ply for hire

No person shall cause or permit a Taxi to ply for hire or load passengers unless authorised in writing to do so by the Airport Company provided that it shall not be an offence to load passengers in one of the Airport Car Parks subject to compliance with the remaining provisions of these byelaws.

7.2 Obstruction

Taxi and Private Hire Vehicle drivers shall not obstruct the carriageway, footpath or buildings or cause annoyance or disturbance to persons in the vicinity.

7.3 Washing down

No person shall wash down or clean out a Taxi or Private Hire Vehicle anywhere on the Airport.

7.4 No more than one Vehicle

No person who has driven a Taxi or Private Hire Vehicle onto the Airport shall, while that Taxi or Private Hire Vehicle remains on the Airport, drive another Taxi or Private Hire Vehicle onto the Airport.

7.5 Running engine

No person shall leave the engine of a Taxi or Private Hire Vehicle running while stationary at the Airport.

Leeds Bradford Airport Byelaws 2022

8. LOST PROPERTY

8.1 Application of byelaws

These byelaws shall apply to the safe custody, re-delivery and disposal of any property, Animal or thing (except a motor vehicle as defined in section 11 of the Refuse Disposal (Amenity) Act 1978) which while not in proper custody, is found on any part of the Airport to which the public or passengers have access or in any Vehicle owned or operated by or on behalf of the Airport Company excluding any property or thing found on board an Aircraft, in a Taxi, Private Hire Vehicle or Public Service Vehicle or on premises let by the Airport Company.

8.2 Person who finds property

Subject to the provisions of the Customs and Excise Acts, any person (other than a member of Airport staff or an Airport Official or a Constable) who finds property which they believe to be lost or abandoned shall as soon as reasonably practicable notify a member of Airport staff, an Airport Official or a Constable and inform that person of the place and circumstances in which it was found.

8.3 Property to be delivered to Lost Property Office

8.3.1 Subject to any provisions of the Customs and Excise Acts, and paragraph 8.3.2 below, any member of Airport staff or an Airport Official or a Constable who is notified pursuant to byelaw 8.2 or who finds any property to which these byelaws apply shall, as soon as reasonably practicable and in any case before leaving the Airport (but subject always to any applicable security check requirements), deliver such property for safe custody in the state in which it comes into their possession to the Lost Property Office and inform a member of Airport staff or an Airport Official at the Lost Property Office of the circumstances in which it was found.

8.3.2 If before any lost property shall have been delivered for safe custody to the Lost Property Office, it is claimed by a person who satisfies the member of Airport staff or Airport Official or Constable, as the case may be, that that person is the true owner, it shall be returned to that person, without fee, on giving their name, address and valid identification to the member of Airport staff or Airport Official or Constable who shall, as soon as possible, report the facts and give the claimant's name and address and a description of the lost property to the Lost Property Office.

8.4 Records of lost property

Any other property delivered to the Lost Property Office shall be retained in safe custody by the Airport Company or an Airport Official until claimed by the true owner or disposed of in accordance with these byelaws and the Airport Company or an Airport Official shall keep, for a period of not less than 6 months, a record showing particulars

Leeds Bradford Airport Byelaws 2022

of the lost property, the date on which it was found and the ultimate disposal date of the lost property provided that:-

- 8.4.1 Official documents, including licences, passports and identity books shall wherever practicable be returned promptly to the appropriate government department, local authority or other body or person responsible for issuing, controlling or dealing with them; and
- 8.4.2 Where the name and address of the true owner of any lost property other than the documents referred to in the preceding provision, are readily ascertainable the Airport Company or an Airport Official shall promptly notify them that the lost property is in their possession and may be claimed in accordance with these byelaws.

8.5 Claiming of property

If any lost property, while it is retained by the Airport Company in safe custody, is claimed and the claimant proves to the satisfaction of the Airport Company or an Airport Official that the claimant is the true owner and gives their name, address and valid identification to a member of staff of the Lost Property Office or an Airport Official, it shall thereupon be delivered to the claimant upon payment of such charges as the Airport Company may from time to time fix for the return of any lost property delivered to the claimant.

8.6 Disposal of property

- 8.6.1 If any lost property retained by the Airport Company or an Airport Official for safe custody in accordance with these byelaws is not, within four weeks of the date when it was delivered to the Lost Property Office, re-delivered to a person pursuant to byelaw 8.5 hereof, the Airport Company or an Airport Official shall be entitled to sell it for the best price that can reasonably be obtained or, in the case of items of negligible value, to dispose of it as they think fit.
- 8.6.2 Notwithstanding the foregoing provisions of these byelaws, if any lost property retained by the Airport Company or an Airport Official pursuant to these byelaws is of a perishable nature and if, within 24 hours from the time when it was found, it has not been re-delivered to a person pursuant to byelaw 8.5 hereof, the Airport Company or an Airport Official shall be entitled to sell it at the best price that can reasonably be obtained or dispose of it as they think fit.
- 8.6.3 Notwithstanding the foregoing provision of these byelaws any lost property which is or which becomes objectionable may forthwith be destroyed or otherwise disposed of in a reasonable manner.

8.7 Proceeds

The Airport Company shall:

Leeds Bradford Airport Byelaws 2022

- 8.7.1 Be entitled to deduct from the proceeds of the sale of any lost property its reasonable storage and sale costs;
- 8.7.2 Retain the balance for three months from the date of the sale in case of any claim by the true owner; and
- 8.7.3 After three months from the date of sale, pay the proceeds of the sale of the lost property to a charity of its choice.

8.8 Power to open packages etc

Where any lost property is contained in a package, bag or other receptacle, a Constable or an Airport Official may cause such receptacle to be opened and the contents examined, or require the claimant to open it and submit it and its contents for examination, for the purpose of:-

- 8.8.1 Identifying and tracing the owner of the lost property;
- 8.8.2 Ascertaining the nature of the contents; or
- 8.8.3 Satisfying the Airport Company or an Airport Official that the contents do not include any item or items which may put at risk the safety or security of the Airport, any Aircraft or any air navigation installation.

And if any item or items referred to in 8.8.3 above are found, they shall be handed to a Constable or an Airport Official immediately.

9. GENERAL

9.1 State name and address

A person shall, if requested to do so by a Constable or an Airport Official, state their correct name and address and the purpose for which they are on the Airport.

9.2 Travel documents

A person who is using or intends to use the Airport for travel shall, if requested to do so by a Constable or an Airport Official, produce details of their travel arrangements and identity documents including passport.

9.3 Vehicle Accident reporting

Where, on a part of the Airport to which the Road Traffic Enactments do not apply, any Accident involving a Vehicle occurs by which:-

- 9.3.1 Personal injury is caused to a person other than the driver of that Vehicle; or
- 9.3.2 Damage is caused:-

Leeds Bradford Airport Byelaws 2022

- (a) To a Vehicle other than that Vehicle;
- (b) To an Animal other than an Animal in or on that Vehicle; or
- (c) To any other property

that driver shall stop and give their name and address, the name and address of the owner of the Vehicle, the registration number or identification marks of the Vehicle and details of the Accident to a Constable, an Airport Official, or other person having reasonable grounds for requiring them as soon as reasonably practicable and in any event within 24 hours of the Accident.

9.4 Aircraft Accident reporting

Where, on a part of the Airport to which the Road Traffic Enactments do not apply, any Accident involving an Aircraft occurs:-

9.4.1 If present at the time of the Accident, the pilot in command (or, if the Aircraft is being moved by another person, that person (including the tug-driver if the Aircraft is being towed)) shall stop and give:-

- (a) Their name and address;
- (b) The name and address of the person who is the Operator of the Aircraft at the time of the Accident;
- (c) The identification marks of the Aircraft; and
- (d) Details of the Accident

to a Constable, an Airport Official, or other person having reasonable grounds for requiring them as soon as reasonably practicable and in any event within 24 hours of the Accident;

9.4.2 The driver of any Vehicle involved shall stop and give:

- (a) Their name and address;
- (b) The name and address of the owner of the Vehicle;
- (c) The registration number and any identification marks of the Vehicle;
- (d) Details of the Accident

to a Constable, an Airport Official, or other person having reasonable grounds for requiring them as soon as reasonably practicable and in any event within 24 hours of the Accident.

9.5 Production of insurance details etc

Leeds Bradford Airport Byelaws 2022

Any person driving a Vehicle in a Restricted Area shall if requested to do so by a Constable or an Airport Official produce, either immediately or within seven days at a place specified by the Constable or Airport Official, details of the third party insurance cover for the operation of the Vehicle in the Restricted Area, their airside driving permit and, if applicable, their Competence to Drive.

9.6 Information as to a driver of a Vehicle

Any person keeping a Vehicle in a Restricted Area or any other person shall give such information as to the identity of the driver to a Constable or an Airport Official as it is in their power to give and which may lead to the identification of the driver.

10. REVOCATION OF BYELAWS

The Leeds Bradford International Airport Byelaws, dated 22 February 1990 are hereby revoked.






Leeds Bradford Airport Byelaws 2022

Executed as a deed by **Leeds Bradford Airport Limited** acting by two directors:

.....  Vincent Hodder, CEO

.....  Alex Tong, CFO

The foregoing byelaws are hereby confirmed by the Secretary of State for Transport and they shall come into operation on 21st AUGUST 2022.

Signed by:

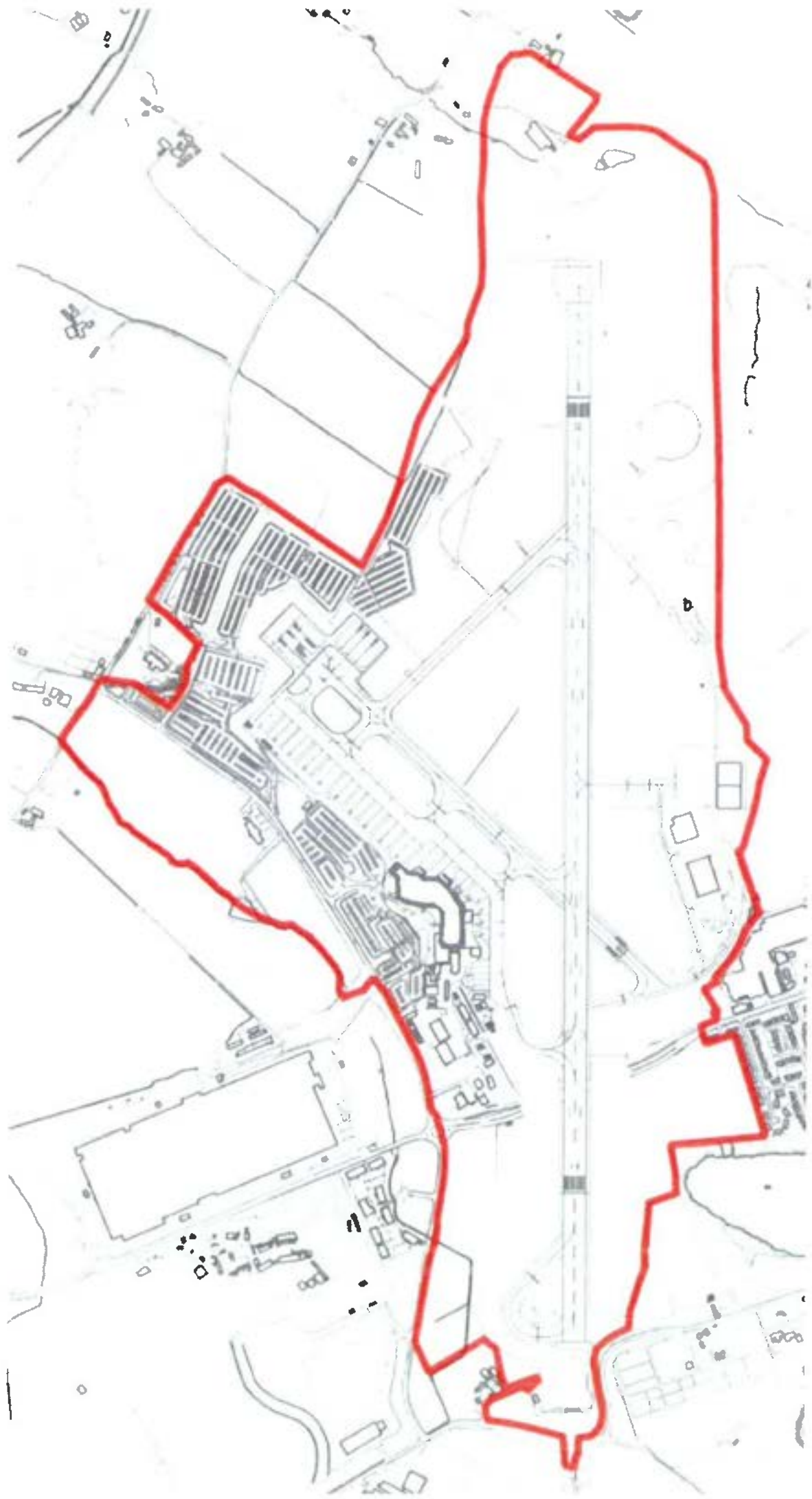
..... 

Deputy Director, Airport Policy by Authority of the Secretary of State for Transport

Leeds Bradford Airport Byelaws 2022

Schedule 1 - Airport boundary map





IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
B E T W E E N

- (1) LEEDS BRADFORD AIRPORT LIMITED
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
- (4) NIAL SERVICES LIMITED

Claimants

-and-

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 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 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 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

VJH2

This is the exhibit marked “VJH2” referred to in the witness statement of Vincent John Hodder.

Extinction Rebellion members protest against Leeds Bradford Airport expansion



The protestors.

A group of Extinction Rebellion protestors have gathered at Leeds Bradford Airport to protest against a planned expansion.

The group of around 30 are stood at the roundabout junction of the airport holding placards warning of the increased pollution.

Leeds Extinction Rebellion airport expansion 'die-in'

- Published
🕒 11 September 2019



Image caption,

Protesters targeted a full council meeting at Leeds Civic Hall

Climate change activists have staged a "die-in" to protest against airport expansion plans.

Extinction Rebellion joined people who live near Leeds Bradford Airport (LBA) to chant "no more planes" during a meeting of all Leeds City Councillors.

Protesters have urged the council to withdraw support of the expansion.

The council declared a climate emergency in March but protesters said it would not meet its carbon reduction targets if the expansion went ahead.

The £12m airport plans, supported by Leeds and Bradford Councils and the West Yorkshire Combined Authority, include a three-storey terminal extension and new link roads to improve access.

A two-storey aircraft pier would replace the current pier.

Council chiefs said the changes would boost the regional's economic growth by about £3bn and, if approved, the new building could be open by the end of the year.

But Extinction Rebellion said pushing on with airport expansion plans was "incompatible" with the climate emergency declaration.

"The council are not acting on their words," an Extinction Rebellion spokesman said.

"It has been, and continues to be an enthusiastic backer of the £100m airport road development across the green belt."

Image source, Extinction Rebellion

Image caption,

Extinction Rebellion campaigners and residents gathered outside Leeds Civic Hall

Extinction Rebellion said research showed emissions from LBA, even at current levels, would exceed the entire "carbon budget" set by Leeds council in an attempt to achieve its zero carbon target by 2030.

"Continued support for airport expansion indicates the council is not facing up to its responsibilities," it said.

Dru Long, who lives in Holt Park near the planned link road, said: "Leeds simply cannot meet its carbon reduction targets if the expansion goes ahead.

"It's time for the council to show it is serious about the climate emergency we face."

Image source, Leeds Bradford Airport

Image caption,

The airport hopes the new terminal extension will be open by the end of the year

Extinction Rebellion said backing the airport and roads investment was "fundamentally incompatible with ensuring a liveable future for citizens."

"We won't watch quietly while they destroy our futures," it added.

Follow BBC Yorkshire on [Facebook, external](#), [Twitter, external](#) and [Instagram, external](#). Send your story ideas to yorksline.news@bbc.co.uk, [external](#).

Related Internet Links

- [Leeds Bradford Airport](#)

The BBC is not responsible for the content of external sites.

Campaigners chain themselves to railings in protest over £150m Leeds Bradford Airport expansion

Extinction Rebellion activists also shut down a council meeting by staging a "die-in" protest



Two of the climate change campaigners with bike locks around their neck in protest against the expansion of Leeds Bradford Airport

Climate change campaigners have put padlocks around their necks and chained themselves to railings during a protest against [a planned expansion at Leeds Bradford Airport](#).

Most of the protesters outside Leeds Civic Hall held up signs in a bid to draw attention to their campaign - but a few individuals locked themselves to a metal fence by clipping bright green bike locks tightly around their necks.

The keys have been handed over to decision-makers at [Leeds City Council](#), with the protesters hoping to put their views forward and convince them to scrap the planned £150 million expansion.

Several other campaigners also forced a council meeting to be abandoned by staging a "die-in" protest at Leeds Civic Hall, while others disrupted proceedings by reading a passionate plea to cancel the plans.



Extinction Rebellion member Katie Ritchie-Moulin is one of the campaigners to have chained themselves to the fence.

She told **LeedsLive**: "We've given the keys to councillors and we're waiting for them to come and unlock us.

"It was planned at a meeting. We had a discussion about things we could do to try and get the council to realise how serious this issue is. It's a really serious problem."

The 20-year-old University of Leeds student said chaining themselves to the railings could be seen as drastic, but added that going ahead with the expansion plans would be "pretty drastic too".



Extinction Rebellion member Katie Ritchie-Moulin, 20, was one of four who chained themselves to railings outside Leeds Civic Hall to protest the planned expansion of Leeds Bradford Airport

"There's been the Climate Jury in Leeds, and one of their key points is that the Leeds Bradford Airport expansion is totally incompatible with emissions targets.

"We're just trying to alert them to how important this issue is to the people of Leeds."

Katie, who studies medical science, joined Extinction Rebellion last September and today chained herself to the railings today with three other members.

"We're just sitting and waiting," she said. "The meeting has been adjourned so the councillors are leaving - hopefully, they will come out soon. It's very cold.

"We're going to stay here and hopefully they will come and speak to us. They serve the people of Leeds so to leave four of them out in the cold feels a bit harsh."

Liz Pell, 30, said: "As one person got removed from the meeting, another stood up and carried on the reading. There were about 10 people taking part by the end.

"Some protesters then did a 'die-in' protest in front of where all the seats are.

The meeting has been adjourned and it is not yet clear whether it will continue today.

Leeds Bradford Airport has recently announced ambitious plans to build a brand new £150 million terminal at its Yeadon base to replace the existing 1960s building.

[There are also proposals to relax night-time flying restrictions](#), which bosses say places the Yorkshire airport "at a competitive and economic disadvantage".

The two key decisions - which are aimed at boosting passenger numbers to seven million a year by 2030 - will be presented to councillors at a Plans Panel meeting this afternoon (Thursday), who will scrutinise the plans.

Climate change campaigners say the controversial expansion of the airport is at odds with the council's ambitious proposals to become carbon neutral by 2030.

In November 2019, [the Leeds Climate Change Citizens' Jury came up with a list of 12 key recommendations](#), which included a plea to scrap any expansion plans at the airport.

Scientists at the [University of Leeds](#) have also told the council that [the expansion would be "entirely at odds with any serious attempt" to tackle climate change](#).

A spokesperson for Leeds Bradford Airport said plane technology is constantly improving and becoming more greener. They have also pointed to the fact that the new terminal would be one of the most environmentally friendly airport buildings in the entire world if given approval.

Extinction Rebellion to protest in Millennium Square against Leeds Bradford Airport expansion plans

Extinction Rebellion will be staging a further protest this weekend against Leeds Bradford Airport (LBA) expansion plans.

Socially-distant protesters will gather in Millennium Square on Saturday, August 29 from 3pm to 5pm in support of the Group for Action on [Leeds Bradford Airport](#) (GALBA).

GALBA will be cycling a route around Leeds, Bradford and [Wakefield](#) to highlight areas which may be affected by sound pollution if the expansion plans are approved.

Sign up to our daily newsletter

LBA submitted plans to build a new £150million terminal in early 2020.



Christopher Hore, Alstair Chestermn and Drew Long of Extinction Rebellion hold socially distanced protest against expansion of Leeds Bradford Airport outside Leeds Civic Hall. 21 May 2020. Picture: Bruce Rollinson

In the plans, they claimed that the ‘state of the art’ terminal would include three main floors with improved vehicle access.

It would also be closer to a proposed parkway rail station, announced by [Leeds City Council](#) last year.

The terminal would accommodate seven million passengers per year by 2030.

[Extinction Rebellion](#) has held several protests this year against the expansion plans, both [outside Leeds City Council’s Civic Hall](#) headquarters and outside a public consultation meeting held at the [Mercure Parkway Hotel](#).



Extinction Rebellion Protest Neville Street Bridge. 16 July 2019. Picture: Bruce Rollinson

The group claims the proposed expansion, yet to be approved by council planning chiefs, will add to climate change due to the increased number of flights likely to take place.

An Extinction Rebellion Families Leeds spokeswoman said: "It breaks my heart to see that businesses, corporations and individuals are still putting profit before the health and wellbeing of humans and all life on this planet.

"When we are facing the worst crises ever imagined - heat waves, floods, droughts and famine; when the world has been struck to stillness by a novel pandemic; when there are hundreds of thousands of people already suffering and dying due to man-made climate related problems; when will it finally be enough?

"I will be able to look my daughter in her eyes and tell her I tried to put an end to this madness, that we knew there was a better way to live and I fought for it with everything I had.

"I hope that more people realise that if we join together for the same cause we will have the power to change before we destroy ourselves completely."

In July, young climate change [activists sent an open letter pleading](#) with Leeds City Council not to approve the plans.

In an open letter sent to senior council decision-makers, Leeds YouthStrike4Climate claimed the plans, which could see the number of flights at the facility increase, could disproportionately affect both disadvantaged areas and schoolchildren.

A statement from the climate strikers said: "There are 36 schools under the flight-path and more noise from increased flights would risk further disrupting pupils' education following the Covid-19 crisis."

Campaigner Annwen Thurlow added: "Our house is already on fire – we cannot let this expansion add more fuel. The council has a responsibility to protect our health and wellbeing."

Leeds YS4C activist Robbie Strathdee said: "The flight-path cuts right across the city, so expansion would do damage to some of Leeds' most disadvantaged communities.

"The climate crisis is intrinsically an issue of racial and social justice, with disadvantaged communities already suffering its impacts most severely in Leeds and beyond. We mustn't heap injustice upon injustice through expansion.

“A green recovery for Leeds could look like whatever we want and need as a city – but it cannot look like an expanded airport.”

A response to the statement on behalf of LBA stated while it understood the concerns expressed by Leeds YouthStrike4Climate, the development would in fact create an ‘economic boost to our region’, as well as hundreds of construction jobs, from right across Leeds, Bradford and Yorkshire.

It added any approval of the LBA application would not impact upon Leeds City Council’s ability to meet its climate emergency commitments, adding the aviation industry has made its own commitment to become net zero by 2050.

-> [Opposition to Leeds Bradford Airport expansion grows as 90 Leeds academics and third MP object to plans](#)A spokesperson for Leeds Bradford Airport said: “We value feedback from our communities on our proposals for a replacement terminal.

“While we can appreciate that people will be concerned about noise and emissions, we have made very clear provisions in our proposals around how we will mitigate risk and we encourage individuals to review the reports from leading experts on the portal.

“We also continue to work with the wider aviation industry on our own sustainable targets, which are regulated at an international level and are not part of Leeds City Council’s climate emergency commitments.”

The airport also claimed it had reduced its emissions by 45 percent in the last five years, and expected to see an increase in aircraft arrivals and departures from 30,000 to 46,000 per annum as part of the proposal.

Climate change activists protest over Leeds Bradford airport £150m expansion plans



Climate change activists have gathered in the centre of Leeds to voice their opposition to plans for a new £150m new terminal at Leeds Bradford Airport.

Protesters brought placards to the event outside the Art Gallery while others cycled around West Yorkshire to raise concerns about potential noise pollution and CO2 emissions.

Leeds Bradford Airport said the terminal would be one of the most sustainable in the UK.

Extinction Rebellion and GALBA protest against Leeds Bradford Airport expansion plans



Protesters gathered outside Leeds Art Gallery

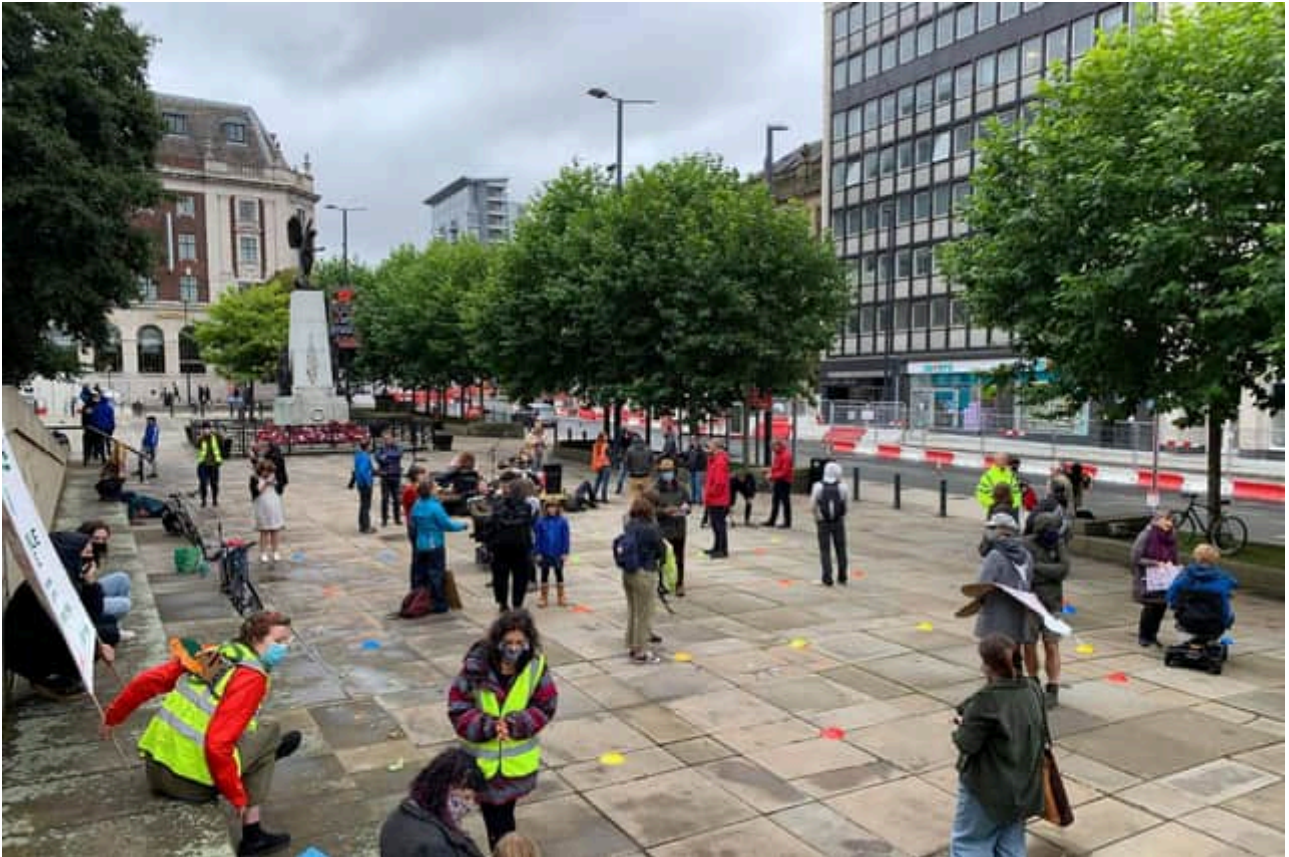
Extinction Rebellion staged a protest in Leeds city centre today against Leeds Bradford Airport (LBA) expansion plans.

Socially-distant protesters gathered outside [Leeds](#) Art Gallery today in support of the Group for Action on [Leeds Bradford Airport](#) (GALBA).

The 'Ride for the Noise' socially distanced event - which took place between 3 and 5pm - saw many follow a fancy dress theme of “wings for birds and bees, not planes”, dressing as winged creatures.

Sign up to our daily newsletter

More than 50 protesters gathered outside the gallery steps - with a silent protest from a group of people dressed in red.



Protesters gathered outside Leeds Art Gallery

Leeds XR, together with GALBA (Group for Action on Leeds Bradford Airport) took a bike ride across the region 'to show everyone in West Yorkshire how far the noise pollution will travel if the expansion is approved'.

On the Facebook group for the event, Leeds XR said: "The people of Leeds will show how we feel about this crime of ecocide against citizens and the world."

LBA submitted plans to build a new £150million terminal in early 2020.

In the plans, they claimed that the ‘state of the art’ terminal would include three main floors with improved vehicle access.

It would also be closer to a proposed parkway rail station, announced by [Leeds City Council](#) last year.

The terminal would accommodate seven million passengers per year by 2030.

[Extinction Rebellion](#) has held several protests this year against the expansion plans, both outside Leeds City Council’s Civic Hall headquarters and outside a public consultation meeting held at the Mercure Parkway Hotel.

The group claims the proposed expansion, yet to be approved by council planning chiefs, will add to climate change due to the increased number of flights likely to take place.

An Extinction Rebellion Families Leeds spokeswoman said in a statement before the protest: "It breaks my heart to see that businesses, corporations and individuals are still putting profit before the health and wellbeing of humans and all life on this planet.

"When we are facing the worst crises ever imagined - heat waves, floods, droughts and famine; when the world has been struck to stillness by a novel pandemic; when there are hundreds of thousands of people already suffering and dying due to man-made climate related problems; when will it finally be enough?

"I will be able to look my daughter in her eyes and tell her I tried to put an end to this madness, that we knew there was a better way to live and I fought for it with everything I had.

"I hope that more people realise that if we join together for the same cause we will have the power to change before we destroy ourselves completely."

A spokesperson for Leeds Bradford Airport said: “We value feedback from our communities on our proposals for a replacement terminal.

“While we can appreciate that people will be concerned about noise and emissions, we have made very clear provisions in our proposals around how we will mitigate risk and we encourage individuals to review the reports from leading experts on the portal.

“We also continue to work with the wider aviation industry on our own sustainable targets, which are regulated at an international level and are not part of Leeds City Council’s climate emergency commitments.”

The airport also claimed it had reduced its emissions by 45 percent in the last five years, and expected to see an increase in aircraft arrivals and departures from 30,000 to 46,000 per annum as part of the proposal.

Extinction Rebellion throw fake 'blood' on steps of Leeds Civic Hall following approval of Leeds Bradford Airport plans

Protesters from Extinction Rebellion have thrown fake 'blood' across the steps of Leeds Civic Hall following the council's decision to approve the Leeds Bradford Airport plans.

[Leeds City Council](#) members [approved](#) the airport's £150million plans in principle in a dramatic on Thursday, February 12.

[Councillors](#) voted by nine votes to five to agree to the plans in principle, in a crunch meeting the came to a close at around 10pm last night after [hours of painstaking deliberation](#), comments and questions.

Sign up to our daily newsletter

They asked planning officers to renegotiate conditions on the matters raised by the panel during the meeting.



Extinction Rebellion protesters throwing fake 'blood' on the steps of Leeds Civic Hall.

The updated plans will now return to the council's plans panel committee at a later date.

The expansion plans include a new terminal with three main floors and improved vehicle access, which is to be built closer to a proposed new 'parkway' rail station, new car parking areas, as well as a new bus terminal and taxi drop-off facilities to the front of the new passenger terminal.

Planners also want to modify flight time controls, and to extend the daytime flight period available at [Leeds Bradford Airport](#).

Campaigners voiced their views about environmental and noise concerns, while supporters said the infrastructure would improve the economy and could go on to establish the city as a leading business hotspot.





Extinction Rebellion protesters pictured in 2020.

Today, protesters from climate change action group [Extinction Rebellion](#) threw a bucket of fake 'blood' across the steps while shouting that the council has "blood on its hands".

A spokesperson from Extinction Rebellion said: "Leeds City Council declared a climate emergency in 2019.

"We have been presented with ambitious targets and community building ideas.

"The choice to allow the expansion of the airport, and completely disregard their own commitments to reach carbon neutral by 2030 is a disgrace.

"They have made a mockery of all of their empty promises and shown themselves to be inadequate at their job, unable to link unambiguous objectives with real life situations.

"This has led them to making this decision which fails to safeguard their constituents against the traumas of the climate crisis.

They added: "There has recently been the emergence of new studies suggesting that we have greatly underestimated the impact of air pollution on human health, with as high as 1 in 5 deaths globally being attributed to pollution from the combustion of fossil fuels.

"They have sentenced hundreds of thousands of their own citizens to a premature death. Leeds City Council, you have blood on your hands."

Environmental concerns were raised by several councillors during the meeting.

Voting against the proposals, Coun Neil Walshaw (Lab) said: "The climate emergency represents a civilisation level threat. I wish that was hyperbole but it is not.

"There is about 10 years left to avoid catastrophic climate change. This application will prevent Leeds from becoming climate neutral by 2030.

"I think we have a solemn duty to think about the people of Leeds and I will be voting no."

And Coun Al Garthwaite (Lab) added: "I don't want to be part of making a decision that is going to cause illnesses and death in the next 20 years.

"I think it is too soon to be doing what is suggested"

"The effect on people, biodiversity and all our lives. I don't think it is right.

“I didn’t become a councillor in order to do harm and my thinking is that agreeing to this at this stage is to do harm.”

However, other councillors said the decision was very "complex" and said that a "balance" had to be struck.

Coun Caroline Gruen (Lab) said: "I do think people will continue to fly.

"I do not in any way underestimate the fundamental and urgent need to address climate change immediately.

"I am really torn inbetween the balance [between the economical benefit and climate issues].

"It's been a really complex debate and I think we need to look at those conditions much more analytically."

Coun Elizabeth Nash (Lab) added: “I don’t think there is a single member of the council not concerned about pollution.

“But we can’t act like King Canute trying to hold back the waves.”

Coun Robert Finnigan (Independent) added: “I am concerned that if we don’t take this economic opportunity someone else will.

“I am worried we will be in the same position in terms of climate change.

“It is with great reluctance that I would support this particular application but only on the proviso that we go back and revisit the conditions.”

Following the decision, Andy Clarke, Chairman of Leeds Bradford Airport, said: “We thank the Plans Panel for all their diligent considerations and we are delighted with their support in principle.

"If fully approved, our scheme would enable us to become a net zero airport, delivering a much-improved passenger experience and creating thousands of jobs, helping to support our region’s recovery. We look forward to working with officers and hearing the final decision of the committee in due course.”

A Leeds City Council spokesperson said: "The council recognises that the Leeds Bradford Airport planning application has been the subject of much public debate and, from the moment it was first submitted, full and proper attention has been paid to the evidence and arguments put forward by supporters and opponents alike.

“There were a large number of matters for plans panel members to consider during this process, including the council’s declaration of a climate emergency and the issue of increasing carbon emissions from flights.

"Current Government policy points to these emissions being something that should be primarily tackled at a national level – and addressed through international agreements and protocols – rather than by suppressing growth at individual airports in a way that could simply export passengers to other nearby airports at a higher financial cost to them and increase surface transport emissions.

"The city plans panel also took into account matters such as the impact of aircraft noise on residents and the airport's proposals for noise mitigation and landscaping as well as planned accessibility improvements designed to encourage a greater proportion of passengers and staff to use public transport for their journeys to and from the site.

"In addition, the airport's plans showed that the proposed new terminal would replace the outdated and inefficient existing terminal and be built to a higher standard of environmental performance that would also provide an improved 'gateway' to Leeds, with an associated creation of new jobs.

"The application has been approved by the city plans panel today taking into consideration all of these issues, subject to a change and tightening up of certain conditions being discussed and agreed with the applicant, a section 106 agreement and referral to the Secretary of State for Housing, Communities and Local Government. The council is keen to continue working closely with local residents, businesses, community associations and the airport as the development begins to take shape."

Extinction Rebellion: Leeds Civic Hall paint protester in court

- Published
🕒 23 November 2021



Image source, Extinction Rebellion Leeds

Image caption,

Video shown in court showed a woman pouring red liquid down the steps of Leeds Civic Hall

An Extinction Rebellion protester who poured paint over the steps of a council building was found with red stains on her hands, a court has heard.

Elizabeth Pell, 32, denies criminal damage by dumping the liquid and leaving a series of red handprints on stone columns outside Leeds Civic Hall.

Ms Pell told officers the paint was washable and would disappear when it rained, Leeds Magistrates' Court heard.

She was arrested after refusing to give her details, a trial was told.

The court heard her solo protest happened on 12 February - a day after councillors approve a planned expansion at Leeds Bradford Airport.

Prosecutor Geoff Ellis played footage to the court, originally posted on an Extinction Rebellion Facebook page, of a woman pouring a bucket of red liquid over the building's steps.

She then shouts: "Leeds City Council, you have blood on your hands".

After making a short speech, she uses another red liquid to make handprints on the columns at either side of the entrance.

Image caption,

It is thought food colouring was used to make handprints on the stone columns outside the building, the court heard

Mr Ellis said police officers were alerted by a member of the public to a woman pouring red paint on to the steps of the building.

When officers arrived, he said, they found the defendant with red stains on her hands, clothes and boots.

In body-worn footage shown to the court, Ms Pell, from Moortown, Leeds, is heard to tell several PCs that the paint was water-based and would "literally wash away" when it rained.

Officers said they were left with "little option" but to detain her, Mr Ellis said, after she refused to give her details, assist with clean-up efforts or accept an alternative resolution.

She was identified via a bank card found in her possession, he told the court, and police later confiscated three bottles of food colouring from her.

Photos taken at Elland Road police station showed Ms Pell's hands marked with red stains, Mr Ellis said.

During police interview she replied "no comment" to all questions.

Her trial, which had been due to conclude in one day, was adjourned to 14 December due to technical issues.

Health Professionals protest at Leeds Bradford Airport

They're calling on Leeds City Council to reverse their decision to expand the airport



Medact Leeds

Banner for the protest at Leeds Bradford Airport

Author: Hannah Norbury Published 4th Sep 2021

Health professionals are protesting at Leeds Bradford Airport today (4th September), calling on Leeds City Council to reverse their decision to expand the airport.

Protesters, will be joined by climate activists to gather on the grass verge at the roundabout, where the A658 meets Whitehouse Lane and leads down to Leeds Bradford Airport.

Their message is: airport expansion is bad for our health and a cost the community simply cannot afford

Dr Richard Solomons, a GP in Keighley and one of the coordinators of the protest, says:

“The recent ‘code red’ report from the world’s leading climate scientists told us that we can protect our future health, and we can prevent the kind of climate chaos the world has seen this year, by cutting greenhouse gases in half by 2030. Allowing Leeds Bradford Airport to expand would mean doubling its greenhouse gas emissions by 2030 and would make the Council’s own climate targets impossible to achieve. We can protect job security too by rapidly moving the local economy from high to zero carbon jobs.”

Dr Richard Solomons

Dr Mia Thomas works as a paediatrician in Leeds health services. She says:

“I work to help look after the health of children in West Yorkshire. Local air pollution in Leeds is already above the World Health Organisation’s recommended levels and increasing air and noise pollution is certain to be detrimental to children’s health. It is all of our responsibility to safeguard

our children's future and this means we must fight the expansion of the airport and concentrate on building a fair transition to a zero carbon economy."

She added:

"The increase in NO2 emissions and tiny particles (known as PM2.5) caused by an increase in traffic will be extremely harmful to the health and wellbeing of nearby communities. As it stands, local levels of PM2.5 are already in contravention of World Health Organisation regulations, yet continue to rise. Poor quality air is estimated to cause, on average, 300 deaths in Leeds every year."
Dr Mia Thomas

Dr Tess Mattam who works as a GP in Leeds says:

"We've all seen the terrifying wildfires and floods across the world recently. These are the early effects of the climate crisis, which will get worse - much, much worse - if we do nothing. The good news is that we can make a better future if we make the right decisions now. By halving our emissions in the next 10 years, we can stop the climate crisis from getting worse. That's why it's so important not to let the airport expand and double its greenhouse gas emissions in the next 10 years. As the Secretary General of the United Nations said 'there is no time for delay and no room for excuses'."

A Leeds City Council spokesperson said:

"The council recognises that the Leeds Bradford Airport planning application has been the subject of much public debate and, from the moment it was first submitted, full and proper attention has been paid to the evidence and arguments put forward by supporters and opponents alike, including matters in relation to Public Health. It should also be noted that the application was assessed on its own individual merits as part of the council's normal planning process.

"There were a large number of matters for plans panel members to consider during this process, including the council's declaration of a climate emergency and the issue of increasing carbon emissions from flights. Current Government policy points to these emissions being something that should be primarily tackled at a national level – and addressed through international agreements and protocols – rather than by suppressing growth at individual airports in a way that could simply export passengers to other nearby airports at a higher financial cost to them and increase surface transport emissions.

"The city plans panel also took into account matters such as the impact of aircraft noise on residents and the airport's proposals for noise mitigation and landscaping as well as planned accessibility improvements designed to encourage a greater proportion of passengers and staff to use public transport for their journeys to and from the site.

"In addition, the airport's plans showed that the proposed new terminal would replace the outdated and inefficient existing terminal and be built to a higher standard of environmental performance that would also provide an improved 'gateway' to Leeds, with an associated creation of new jobs.

"Following the consideration of the application by the City Council's City Plans Panel, consistent with the legal requirements, the application has been referred to the Secretary of State. The Secretary of State has also been requested to 'Call In' the application from the Secretary of State, by opponents of the proposal. At the current time, the City Council is still awaiting decision on the Call In request."

A spokesperson for Leeds Bradford Airport (LBA), said:

"We welcome all feedback and understand the concerns presented. LBA's application is not about expansion, but about achieving what we already have consent to do in a more sustainable way, building cleaner and greener infrastructure for the future. Development will make LBA an outstanding net zero airport ahead of government targets on sustainable aviation with a much-

improved passenger experience, connecting Yorkshire with other parts of the country and the world for business and tourism whilst creating thousands of jobs in the process. Leeds City Council recognised these benefits when approving the proposals earlier this year and we hope the Government will see through on its promise to level up the north of England and sign off approval in due course.”

Health professionals protest against the expansion of Leeds Bradford airport



- [Watch Sally Simpson's report](#)

Health professionals have led a demonstration against the expansion of Leeds Bradford airport.

The protestors want Leeds City Council to reverse its decision to approve the plan.

They gathered close to the site in Yeadon, which is earmarked for a one hundred and fifty million pound upgrade.

The plans are for a £150m new terminal to replace the existing one capable of accommodating 7 million passengers a year by 2030.

Airport bosses and Leeds City Council both say it'll create a vital gateway to the North, boosting jobs, tourism and the economy.

The airport's promotional video insists it's not about growing larger but working smarter by making the terminal efficient and sustainable.

But that doesn't satisfy these campaigners who say more passengers mean more flights and more emissions.

A Leeds City Council spokesperson said: "The council recognises that the Leeds Bradford Airport planning application has been the subject of much public debate and, from the moment it was first submitted, full and proper attention has been paid to the evidence and arguments put forward by supporters and opponents alike, including matters in relation to Public Health.

"It should also be noted that the application was assessed on its own individual merits as part of the council's normal planning process."

A spokesperson for Leeds Bradford Airport, said: "As part of our proposal we conducted an extensive environmental survey, which demonstrates that the terminal development will not cause a significant adverse impact on air quality, subject to an appropriate mitigation strategy."

"We will also continue to work with our airline partners to improve efficiency, including encouraging them to taxi in and out on fewer engines, as well as bringing in incentives for the use of newer more fuel-efficient aircraft."

Health workers protest over airport expansion

4



Health workers protest over airport expansion

The protest against LBA expansion





Skip to next photo

Health workers protest over airport expansion

HEALTH care professionals led a protest of more than 100 people against expansion at Leeds Bradford Airport.

The demonstration outside the airport was organised by Medact Leeds and called on Leeds City Council to reverse its controversial decision to allow the airport's planning application for a replacement terminal.

They argued that the public health risks to Leeds Bradford and the surrounding areas resulting from doubling air and noise pollution had not been adequately considered.

Dr Mia Thomas, a Leeds paediatrician, spoke of her concern for asthmatics for whom more pollution means more frequent attacks. She said Leeds Council had set a target of net zero for 2030 - but she claimed approving airport expansion would double emissions.

Keighley GP Dr Richard Solomons said: "Holidaymakers and people going to see relatives are not the problem, 15 per cent of flyers take 70 per cent of the flights. We don't need to double the pollution and double our health risk and more flooding in order to provide more flights for the frequent flyers who already have more than their share."

Protestors are urging Leeds City Council to withdraw its support for the application. they say there would be a precedent for this as Stansted Council withdrew its support for airport expansion.

Campaigners at Leeds Medact and Group for Action on Leeds Bradford Airport (GALBA) are urging local people to write to their councillor and MP's.

They said: "We must not let this issue get swept under the carpet. We must keep pressure on our leaders, locally and nationally: tell them you want your sleep, you don't want dirty air, you don't want climate change and more floods. Tell them to withdraw support for Leeds Council Planning approval."

A spokesperson for Leeds Bradford Airport said: "We welcome all feedback and understand the concerns presented. LBA's application is not about expansion, but about achieving what we already have consent to do in a more sustainable way, building cleaner and greener infrastructure for the future. Development will make LBA an outstanding net zero airport ahead of government targets on sustainable aviation with a much-improved passenger experience, connecting Yorkshire with other parts of the country and the world for business and tourism whilst creating thousands of jobs in the process. Leeds City Council recognised these benefits when approving the proposals earlier this year and we hope the Government will see through on its promise to level up the north of England and sign off approval in due course."

The spokesperson added: "Combatting air pollution is an international effort and we are committed to play our part locally. We have been monitoring air quality, both inside and outside the airport boundary, since the mid-1990s, measuring levels of NO2 (nitrogen dioxide). The results reveal we have continually maintained NO2 levels well below the required national air quality standards. As part of our proposal we conducted an extensive environmental survey, which demonstrates that the terminal development will not cause a significant adverse impact on air quality, subject to an appropriate mitigation strategy. We will also continue to work with our airline partners to improve efficiency, including encouraging them to taxi in and out on fewer engines, as well as bringing in incentives for the use of newer more fuel-efficient aircraft."

A Leeds City Council spokesperson said: "The council recognises that the Leeds Bradford Airport planning application has been the subject of much public debate and, from the moment it was first submitted, full and proper attention has been paid to the evidence and arguments put forward by supporters and opponents alike, including matters in relation to public health. It should also be noted that the application was assessed on its own individual merits as part of the council's normal planning process.

“There were a large number of matters for plans panel members to consider during this process, including the council’s declaration of a climate emergency and the issue of increasing carbon emissions from flights. Current government policy points to these emissions being something that should be primarily tackled at a national level – and addressed through international agreements and protocols – rather than by suppressing growth at individual airports in a way that could simply export passengers to other nearby airports at a higher financial cost to them and increase surface transport emissions.

“When it met in February, the city plans panel also took into account matters such as the impact of aircraft noise on residents and the airport’s proposals for noise mitigation and landscaping as well as planned accessibility improvements designed to encourage a greater proportion of passengers and staff to use public transport for their journeys to and from the site.

“In addition, the airport’s plans showed that the proposed new terminal would replace the outdated and inefficient existing terminal and be built to a higher standard of environmental performance that would also provide an improved ‘gateway’ to Leeds, with an associated creation of new jobs.

“Opponents of the plans have asked the Secretary of State for Housing, Communities and Local Government to ‘call in’ – or review – the council’s decision to approve the application. The Secretary of State has yet to say if he is minded to agree to the request, having confirmed in April that he would be taking some additional time to consider the matter.”

Huge protest at Leeds Bradford Airport as climate change demonstrators to hold rally

Activists with Stay Grounded UK are protesting against expansion plans at the 10 airports



Leeds Bradford Airport

Climate activists are set to cause disruption by holding a protest at [Leeds Bradford Airport](#) this weekend.

The demonstrators are targeting 10 UK airports as part of a rally against expansion plans, with the protests organised by Stay Grounded UK.

The rallies will take place at 11am with Doncaster-Sheffield airport, which was formerly known as Robin Hood Airport, also set to be targeted.

The other eight are Bristol, Gatwick, Glasgow, London-City, Luton, Liverpool, Manchester and Southampton.

The protests are part of the Global Day of Action for Climate Justice, coinciding with UN Climate Conference COP26 in Glasgow and organised by the Stay Grounded network.

The protests are part of the Global Day of Action for Climate Justice, coinciding with UN Climate Conference COP26 in Glasgow and organised by the Stay Grounded network.

Details of the protests are included in a Press release from Stay Grounded UK.

It is not clear what form the protests will take or where the activists will gather at each of the airports.

Ray Stewart from Stay Grounded UK said: "We warn that trusting yet-to-be-developed technology to reduce climate-damaging emissions is extremely risky

"Instead we demand that immediate action is taken to prevent any expansion of flying and associated emissions growth.

"Just one return flight from London to New York emits as much greenhouse gas as the average UK household does in a whole year."

Mira Kapfinger from Stay Grounded added: "Maybe, one day, we'll be able to fly in large, long-haul, zero-emission aircraft but we know that's not an option in the foreseeable future. In a climate emergency the only thing we can do right now to cut emissions from flying is to fly less."

Finlay Asher, an aircraft engine designer who now leads the aviation workers' initiative Safe Landing, said: "Any emissions reductions from technological developments will be eaten up by plans for expansion of the sector. Growth is the problem.

"That's why no airport should be allowed to expand."

Earlier this year report claimed the increase in passenger numbers expected at [Leeds Bradford Airport](#) after its £150 million overhaul [could create carbon emissions six times higher than first thought](#).

Protest against expansions held at Leeds Bradford Airport this morning



Protest against expansions held at Leeds Bradford Airport this morning

Protest against expansions held at Leeds Bradford Airport this morning

CAMPAIGNERS from the Group for Action on Leeds [Bradford](#) Airport (GALBA) held a protest against airport expansions this morning.

Campaigners are warning against attempts to greenwash flying with talk of ‘techno-fixes’. They say new technologies and alternative fuels will take decades to be used on international flights, which cause the vast majority of aviation’s greenhouse gas emissions.

GALBA joined with airport campaigns across the country at 11.00am today, with protests also held simultaneously at 11 other airports across the UK.

The protests are part of the Global Day for Climate Justice, coinciding with UN Climate Conference COP 26 in Glasgow.

Chris Foren, chair of GALBA, said: “The Government and the aviation industry claim that new technology means we can carry on flying as much as we like despite the climate crisis.

"It’s deeply irresponsible to spread these false claims. The experts on the Climate Change Committee (CCC) say that such a ‘techno-centric’ approach has a high risk of failure.

"New aircraft designs and alternative fuels are decades away from making a dent in the huge amount of greenhouse gas emissions caused by international flying.

"Just one return flight from the UK to New York emits as much greenhouse gas as the average British household does in a whole year.”

Chris added: “The Intergovernmental Panel on Climate Change has told us we need to halve our emissions by 2030 to reach net zero by 2050.

"For decades, the aviation industry has promised that its techno-fixes will make everything alright. But that’s never happened and it’s not going to happen in the nine years we have left to stop climate breakdown.

"Maybe, one day, we’ll be able to fly in large, long haul, zero emission aircraft, but we know that’s not an option in the foreseeable future. We simply have to stop expanding all airports - now.”

Airport expansion plans need to be immediately halted, if the UK wishes to be net-zero by 2050

Airport campaigners are calling for an immediate halt to all airport expansions and warning against ‘techno-fix’ greenwashing



Campaigners from the Group for Action on Leeds Bradford Airport (GALBA) are joining airport campaigners across the country to call for an immediate halt on all airport expansions and to warn against ‘techno-fix’ greenwashing. They are warning against attempts to greenwash flying with talk of ‘techno-fixes’. The campaigners say that new technologies and alternative fuels will take decades to be used on international flights, which cause the vast majority of aviation’s greenhouse gas emissions.

Airport campaigners call for immediate halt to expansion plans

GALBA will join with airport campaigns across the country at 11.00am today to send a clear message: that all airport expansions should be stopped immediately. Simultaneous protests will be held against plans to expand 12 airports: Heathrow, Stansted, Gatwick, Luton, London City, Southampton, Bristol, Doncaster Sheffield, Liverpool, Manchester, Leeds Bradford and Glasgow. The protests are part of the Global Day of Action, coinciding with the COP26 Conference in Glasgow. Chris Foren, chair of GALBA, said:

“The government and the aviation industry claim that new technology means we can carry on flying as much as we like despite the climate crisis. It’s deeply irresponsible to spread these false claims. The experts on the Climate Change Committee (CCC) warn that such a ‘techno-centric’ approach has a high risk of failure.

“New aircraft designs and alternative fuels are decades away from making a dent in the huge amount of greenhouse gas emissions caused by international flying. Just one return flight from the UK to New York emits as much greenhouse gas as the average British household does in a whole year.

“The Intergovernmental Panel on Climate Change has told us we need to halve our emissions by 2030 to reach net-zero by 2050. For decades, the aviation industry has promised that its

techno-fixes will make everything alright. But that's never happened and it's not going to happen in the nine years we have left to stop climate breakdown.

“Maybe, one day, we’ll be able to fly in large, long haul, zero emission aircraft but we know that’s not an option in the foreseeable future. We simply have to stop expanding all airports – now.”

The government’s ‘techno-centric’ jet-zero strategy has been condemned by scientists from Leeds University for its refusal to follow advice from the government’s expert advisers on the CCC. The CCC has repeatedly warned that because there is no realistic prospect of international flying becoming zero carbon by 2050, the government needs to implement ‘demand control’ measures, including an immediate halt on all UK airport expansion plans.



Would airport expansions meet UK climate targets?

The CCC has advised the UK government to set a requirement “to reduce UK emissions by 78% by 2035, relative to 1990, a 63% reduction from 2019. This will be a world-leading commitment, placing the UK decisively on the path to Net Zero by 2050 at the latest, with a trajectory that is consistent with the Paris Agreement”.

Figure M8.2 Breakdown of aviation sector emissions (1990-2019)



Source: BEIS (2020) Final UK greenhouse gas emissions national statistics 2018; BEIS (2020) Provisional UK greenhouse gas emissions national statistics 2019; BEIS (2020) Energy Trends; CCC estimates for 2019.

Image shows a graph of the breakdown of emissions from the aviation sector.

It is noticeable that aviation emissions have not reduced significantly in the last 30 years and with COP26 currently being hosted this year by the UK, environmental action needs to match environmental rhetoric.

Professor Julia Steinberger, a lead author for the United Nations Intergovernmental Panel on Climate Change 5th and 6th assessment reports, told me:

“The government, whether it be local or national, cannot hide that under its obligations to the Paris Agreement, airport expansion is simply out of the question. The UK already has one of the highest-flying emissions per person in the world, due to a small fraction of extremely frequent flyers.

“Airport expansion simply caters to this minority with very little benefit to local populations. It’s time to rethink who our economies are for, and rethink our investment priorities towards low-carbon infrastructure which benefits the majority of UK residents.”

Is the UK government encouraging aviation emissions?

Cuts to the air passenger duty of 50 percent on domestic flights from 2023, in the budget published last week, will apply to all flights between England, Scotland, Wales and Northern Ireland, excluding private jets. Chancellor Rishi Sunak commented in the autumn budget and spending review that:

“This will help cut the cost of living, with nine million passengers seeing their duty cut by half ... It will bring people together across the UK ... And because they tend to have a greater proportion of domestic passengers ... it is a boost to regional airports like Aberdeen, Belfast, Inverness and Southampton.”

The chancellor claimed that, “We’re also making changes to reduce carbon emissions from aviation”. But there was no development of the mechanism as to how that would be done in light of the UK’s Net

Zero Strategy.

In April 2021, the then secretary of state for housing, communities and local government, Robert Jenrick, delayed the current plans for the expansion of Leeds Bradford Airport “indefinitely”. These plans are now on the desk of the newly appointed Michael Gove. When the sound and fury of COP26 finally dies down, it will be critical for the UK to emerge as a country living up to the environmental standards that it wishes to impose on other countries.

COP26: Thousands march in Leeds over climate change action

- Published
🕒 6 November 2021

Related Topics

- [COP26](#)



Image source, @DrAnneSchiffer

Image caption,

In Leeds, crowds gathered in Millennium Square for the start of the protest

Thousands of climate protesters have marched through Leeds and targeted airports as part of the global day of climate crisis action.

A brass band joined the march which left Millennium Square and weaved through the city centre as similar events were held across the world.

Among protesters were children and NHS staff uniting around the same message.

Demonstrations have also been held at airports Leeds Bradford and Doncaster Sheffield.

The events come midway through the COP26 summit in Glasgow and were aimed at increasing pressure on world leaders attending the conference on climate change.

Chloe Harrison, 23, said the Leeds protest was the first she had ever attended but felt "compelled" to join.

"Climate change is a daily existential crisis for me and my generation," she said.

"Knowing that the planet is withering away at our fingertips is a dreadful, hopeless feeling as one day humans may eventually not be here for anything to have ever mattered at all.

"The things we all do to make a change at home is just a drop in the ocean compared to what the world leaders at COP26 can put into place this week."

Campaigners from the Group for Action on Leeds Bradford Airport staged a rally there calling for all airport expansions to be "stopped immediately".

Chris Foren, chairman of the group, said: "For decades, the aviation industry has promised that its techno-fixes will make everything alright.

"But that's never happened and it's not going to happen in the nine years we have left to stop climate breakdown.

"Maybe, one day, we'll be able to fly in large, long haul, zero emission aircraft but we know that's not an option in the foreseeable future. We simply have to stop expanding all airports - now."

World leaders gathered in Glasgow have so far made promises to curb deforestation, phase out coal, end funding for fossil fuels abroad and cut methane emissions.

Mock funeral staged in Leeds against airport expansion plans and arrest of protester

EXTINCTION REBELLION staged a mock funeral through Leeds city centre yesterday in support of a protester who was arrested during a demonstration against the government's draconian policing Bill.

Campaigner Lizzie Pell was charged with criminal damage after pouring red liquid on the steps of Leeds Civic Hall in February last year.

She took the action after Leeds City Council gave planning permission to the expansion of Leeds-Bradford International Airport, which opponents say will negate carbon emission reductions achieved in the whole of Leeds.

Her case in Leeds magistrates' court was postponed for the third time.

Sam Townson of Extinction Rebellion Leeds said: "We've had some very good news lately.

"There's going to be a public inquiry into the airport's expansion plans and some of the worst proposals in the Policing Bill have been rejected by the House of Lords.

"But there's a lot more work to be done to protect our climate and our rights."

Leeds Bradford Airport expansion plans: Extinction Rebellion demonstration held as protester has criminal damage charge dismissed

Climate campaigners have celebrated Leeds Bradford Airport's decision to pull plans for a £150m expansion as they staged a demonstration in the city centre.

It follows the decision last week by LBA bosses to withdraw blueprints for a replacement terminal building that would allow more flights.

They said the move was in response to "excessive delays" and the Government's decision to require a public inquiry into the scheme.



Campaigners from Extinction Rebellion and GALBA gather outside Leeds Magistrates' Court for a demonstration. Picture: Tony Johnson

The *Yorkshire Evening Post* understands the airport will instead focus on a scaled-back version of the expansion which had already been approved in 2019.

The demonstration, which took place outside Leeds Magistrates' Court, also followed the dismissal of a court case relating to a protester who threw red paint over Leeds Civic Hall steps after the plans were originally approved by the council.

Demonstration organiser Sally Morgan, a member of Extinction Rebellion, said: "One of the reasons we are here is to celebrate the plan's withdrawal, which is absolutely brilliant. Not only is it unhealthy, but it would have completely negated the carbon budget Leeds has.

"The other thing we are here for is Lizzie Pell, who was a lone protester against LBA. Today it has been withdrawn and negated.



Lizzie Pell had been charged with criminal damage after throwing red paint on the steps of Leeds Civic Hall but the case against her has been dismissed. Picture: Tony Johnson

"Lizzie was protesting because it was the day that the council had supported the planning application for [Leeds Bradford Airport](#). It was her view that the council has blood on their hands because it would have caused extra flights, which would have been catastrophic for humanity."

Lizzie, who lives in north Leeds, stood accused of criminal damage after red paint was thrown onto the steps of Leeds Civic Hall in February 2021. It happened on the day that councillors approved the second set of expansion plans put forward by the airport.

Her case had been adjourned on a number of occasions but went before magistrates today and was dismissed.

Speaking outside the court, she told the *YEP*: "I was doing a protest against the council's decision."



The protest celebrated the dismissal of the case against campaigner Lizzie Pell and Leeds Bradford Airport's decision not to proceed with its £150m expansion plans. Picture: Tony Johnson

"I have a young child and they mean the world to me. I want to protect them, and I said this protest was for my children."

The larger plans, which were withdrawn by LBA last week, would have seen a brand new terminal building and runway built on the site near Yeadon, potentially increasing passenger numbers from four million to around seven million a year.

The earlier plans approved by council planning chiefs in 2019 would instead see £25m spent extending the airport's existing terminal. It is expected this would increase passenger numbers to five million a year.

Pauline Bailey, a member of airport campaign group GALBA, was at the demonstration. She said: "I am concerned about climate change, and the powers that be not taking any notice of it. The airport have pulled back, but they are making it clear they want to expand still."



The protestors say they will be watching closely as Leeds Bradford Airport looks at its future development plans. Picture: Tony Johnson

Victoria Smith, a GALBA member from Kirkstall, added: "Our fundamental message is how this will impact on climate change and noise pollution? Other airport campaigners around the country are now looking to Leeds for advice."

A spokesperson for the airport said: "The airport will instead turn its attention to developing the extension to the existing terminal, originally approved by Leeds City Council in 2019, to enable it to meet the rapidly increasing passenger demand as the aviation sector recovers from the pandemic."

The council confirmed last week that the airport still had permission to expand the terminal as per the 2019 plans.

IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
B E T W E E N

- (1) LEEDS BRADFORD AIRPORT LIMITED
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
- (4) NIAL SERVICES LIMITED

Claimants

-and-

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 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 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 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

VJH3

This is the exhibit marked “VJH3” referred to in the witness statement of Vincent John Hodder.

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



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.

Just Stop Oil break into Stansted VIP airfield and spray jets with orange paint 'hours after Taylor Swift's plane lands'

Just Stop Oil protesters have sprayed jets at a London airfield where the group claimed Taylor Swift's private plane landed hours before.

Two protesters entered a private airfield at Stansted Airport at around 5am on Thursday, painting two jets using fire extinguishers filled with orange paint, the group said.

Essex Police later said two women, aged 22 and 28, were arrested on suspicion of criminal damage and interference with the use of national infrastructure.

A statement said: "Officers were on the scene within minutes and detained two people.

"The airport and flights are operating as normal.

"A 22-year-old woman from Brighton and a 28-year-old woman from Dumbarton have been arrested on suspicion of criminal damage and interference with the use or operation of national infrastructure." It comes a day after two [Just Stop Oil protesters were arrested after spraying the historic Stonehenge monument in orange paint](#) as the group appeared to ramp up their protests.

On Thursday, Just Stop Oil said Cole Macdonald, 22, and Jennifer Kowalski, 28, broke into the private airfield demanding that the incoming UK government works to end the extraction and burning of oil, gas and coal by 2030.

The pair used an angle grinder to break into the fenced off area before coating the planes in orange paint.

Taylor Swift has previously been criticised for regularly using a private jet to fly short distances.

But the Shake It Off singer's publicist recently told the BBC she does use carbon offsets to compensate her private jet travel.

Stansted Airport said runway operations were suspended for a short period following the stunt but no flights were disrupted and the airport was operating as normal.

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



Two protesters entered a private airfield at Stansted Airport at around 5am on Thursday, painting two jets using fire extinguishers filled with orange paint
Just Stop Oil

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

The environmental activists were labeled “pathetic” by Labour leader Sir Keir Starmer, while the Prime Minister Rishi Sunak described their protest at Stonehenge on Wednesday as a “disgraceful act of vandalism”.

Two protesters were arrested on suspicion of damaging some of the stones at the ancient site near Salisbury, Wiltshire Police said.

Video footage posted on social media showed two people wearing white shirts running up to the monoliths with spray paint canisters around 11am.

The group explained it had used orange cornflour to create “an eye catching spectacle” on Stonehenge, adding that it will wash away in the rain.

But concerns have been raised that rare lichen that live on the stones could be damaged. English Heritage chief executive Dr Nick Merriman said there appeared to be "no visible damage" to Stonehenge after Just Stop Oil activists sprayed it with orange powder paint on Thursday morning.

Dr Merriman told BBC Radio 4's Today Programme: "It's difficult to understand and we're deeply saddened about this vandalism, but we've been really touched by the messages of sympathy and support we've had.

"Our experts have already managed to clean the orange powder from the stones because we were really worried about what would happen if they got in contact with water.

"So far, there seems to be no visible damage. The site is open to the public again and for the solstice tomorrow."

A Just Stop Oil spokesperson said: “Whilst governments are allowing oil corporations to run amok destroying our communities, the actions of individuals mean very little.

“That’s why Just Stop Oil is demanding that our next government sign up to a legally binding treaty to phase out fossil fuels by 2030.

“Failure to defend the people they represent will mean Just Stop Oil supporters, along with citizens from Austria, Canada, Norway, the Netherlands and Switzerland will join in resistance this summer, if their own Governments do not take meaningful action.”

Just Stop Oil: Police swoop on 27 activists suspected of summer airport chaos plot in wave of raids





West End Final

Police have carried out a nationwide wave of arrests against Just Stop Oil supporters suspected of plotting to disrupt airports this summer.

The arrests took place in London, Gloucestershire, Oxfordshire, Devon, Essex, Manchester, Surrey, Sussex, Norfolk and West Yorkshire, the Metropolitan said in a statement on Friday.

Scotland Yard said that on Tuesday four people were arrested after being identified at Gatwick Airport and have been released on bail.

It said that on Thursday six more people were [arrested at an east London community centre](#) "as part of a publicly-advertised event promoting airport disruption".

"Among those held were several high-profile members of Just Stop Oil who we believe to be key organisers," the force said.

And on Friday, Met officers worked with eight other police forces to arrest 17 suspects at their homes across the country.

Chief Supt Ian Howells, who led the operation, said: "We know Just Stop Oil are planning to disrupt airports across the country this summer, which is why we have taken swift and robust action now."

"Our stance is very clear that anyone who compromises the safety and security of airports in London can expect a strong response from officers or security staff.

"Airports are complex operating environments which is why we are working closely with them, agencies and other partners on this operation."

In response to the wave of arrests, a Just Stop Oil spokesman said: "It isn't a massive surprise.

"I think it speaks volumes when we've got a police force cracking down on non-violent Just Stop Oil supporters in this way.

"The people enacting criminal damage on an unimaginable scale against all of us - oil company executives and the politicians that they've bought, basically - when is it that those folks are going to face the full force of the law?"

Asked about the justification for planning to target airports during the key summer holiday period, the spokesman said: "In normal times, that kind of disruption would be entirely unacceptable.

"But you can't really disassociate what we're potentially planning on doing from the reasons why."

He added that disruption is necessary because people are "dropping dead around the world" from extreme heat, and "tipping points" are being passed.

IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
B E T W E E N

- (1) LEEDS BRADFORD AIRPORT LIMITED
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
- (4) NIAL SERVICES LIMITED

Claimants

-and-

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 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 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 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

VJH4

This is the exhibit marked “VJH4” referred to in the witness statement of Vincent John Hodder.

BREACH NOTICE

NOTICE: You have breached the Byelaws of Leeds Bradford Airport Limited (“LBA”).

Reference to “person served” is to the person on whom this notice is served.

| | |
|---|-------------------------------------|
| Name of person served. (state ‘refused’ if no details are offered and provide a description) | |
| Pass number of the member of staff serving this notice. | |
| Date, time and location of this notice being provided to person served. | Date: Time: Location: |

The person served has been identified as having breached one or more of LBA Byelaws:

| Section of the 2022 LBA Byelaws | Action that is contrary to LBA’s Byelaws | Tick the box(es) that apply) |
|---------------------------------|---|------------------------------|
| (3.3) | You have or have attempted to tamper or interfere with an aircraft. | |
| (3.4) | You have or have attempted to board an aircraft without permission. | |
| (3.7) | You have or have attempted to tamper or interfere with equipment used by or at the Airport. Equipment includes but is not limited mobile equipment, plant or machinery, escalators, lifts and airbridges. | |
| (3.15) | You are causing a disturbance or have committed an offence. This includes using language or making gestures which are lewd, foul or offensive. | |
| (3.16) | You have refused to allow Airport officials to search your baggage, vehicle(s) or items which are under your control. This applies regardless of whether you are a passenger or not. | |
| (3.17) | You have been requested to leave the airport but have returned within the following 24hrs. | |
| (3.24) | You have organised or taken part in any demonstration, procession or public assembly which has or is likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the safety, comfort and convenience of passengers or persons using the Airport. | |
| (3.25) | You have displayed a flag, banner or emblem likely to cause a breach of the peace on any part of the Airport. | |

BREACH NOTICE

| | | |
|--|---|--|
| (3.26) | You have intentionally obstructed or interfered with the proper use of the Airport or obstructed Airport staff in performing their duties at the Airport. | |
| (3.30) | You have remained at the Airport without reasonable cause for doing so. | |
| (4.8) | You have failed to comply with a sign prohibiting or restricting access to any building, road or any part of the Airport. | |
| (4.9) | You have climbed on a wall, fence, barrier, railing or post or breached an area which is identified by the Airport as being restricted. Restricted areas include any part of the Airport within the perimeter fence where access is controlled by security check points, stands, aprons, taxiways and the runway. | |
| (4.13) | You have placed a building, structure, equipment, vehicle or container or any other item within 3m of any fence forming the boundary of a restricted area or entered any part of the Airport which members of the public are not permitted to enter at that time. | |
| (4.15) | You have entered the Airport otherwise than through a gate or entrance provided by LBA for that purpose. | |
| (4.22) | You have removed, displaced, defaced or altered a structure, building or other property at the Airport. | |
| (5.2.2) | You have travelled on foot on an Airport road which does not have a designated footpath or pedestrian walkway. | |
| (5.4) | You have parked, waited or left a vehicle in an area which is not designated for parking. | |
| Add other relevant Byelaws below, if applicable: | | |
| | | |
| | | |
| | | |

You are now required to leave the Airport (including land which is owned by LBA) and are not permitted to return for a minimum period of 24 hours.

LBA’s Byelaws can be found on LBA’s website: <https://www.leedsbradfordairport.co.uk/>.

IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
B E T W E E N

- (1) LEEDS BRADFORD AIRPORT LIMITED
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
- (4) NIAL SERVICES LIMITED

Claimants

-and-

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 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 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 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

VJH□

This is the exhibit marked “VJH□” referred to in the witness statement of Vincent John Hodder.

Eight arrested after climate activists breach German airport



A general view of the Munich International Airport a day before VERDI union called airport workers at Frankfurt, Munich, Stuttgart, Hamburg, Dortmund, Hanover and Bremen airports to go on a 24-hour strike on Friday, in Germany, February 16, 2023. REUTERS/Leonhard Simon/File Photo [Purchase Licensing Rights, opens new tab](#)

FRANKFURT, May 18 (Reuters) - German police arrested eight climate activists who breached the grounds of Munich airport on Saturday, briefly causing the airport to close and leading to around 60 flight cancellations during a busy holiday weekend.

Six of the activists glued themselves to a runway, a police spokesperson said, adding the situation was now under control, with both of the airport's runways open for arrivals and takeoffs.

Climate group Last Generation, which has carried out similar protests in the past, said it was responsible for the action in a series of posts on X showing members on what appeared to be a runway or tarmac with protest signs.

The group later said six individuals had seated themselves on airport asphalt at 4:45 a.m. local time (0245 GMT) to block planes, and it criticised Berlin for subsidising airlines at the expense of rail.

"Problem is the government, not our holiday," one of the signs read.

Germany's interior minister, Nancy Faeser, said security measures at the airport would be reviewed.

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

"The perpetrators must be vigorously pursued," she said.

Germany's transport minister, Volker Wissing, said new laws were needed to punish such actions as criminal, with up to two years in prison. Current laws classify them as minor offences.

An airport spokesperson said the airport had been fully closed to takeoffs and landings for nearly two hours. Some 11 flights had been diverted, around 60 had been cancelled, and delays were still possible, the person said.

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

Sign up [here](#).

Reporting by Tom Sims; Editing by William Mallard and Mark Potter

Munich Airport closed after climate activists from Last Generation glue themselves to runway



German authorities temporarily closed Munich Airport on Saturday after six climate activists broke through a security fence and glued themselves to access routes leading to the runways, officials and local media reported.

The activists, from the group Last Generation, were protesting against flying, the most polluting form of transportation, according to the German news agency dpa. Police have detained the six.

Incoming flights had to be diverted to other airports, an airport spokesperson said. After a couple of hours, the airport's two runways were reopened, although some disruptions to flight schedules may occur, according to a statement on the airport's official website.

Last Generation posted on social media platform X, accusing the German government of "downplaying" the negative effects of flying on the [environment](#) instead of "finally acting sincerely."

German Interior Minister Nancy Faeser slammed the protests and called for them to stop. "Such criminal actions threaten [air traffic](#) and harm climate protection because they only cause lack of understanding and anger," she wrote on X.

Fraser also applauded police efforts to bring order back to the airport and called for airport safety measures to be checked.

The general manager of the German Airports Association Ralph Beisel sharply criticised the climate activists' actions.

"Trespassing the aviation security area is no trivial offense. Over hundreds of thousands of passengers were prevented from a relaxed and punctual start to their Pentecost holiday," he told dpa.

Beisel also called for harsher penalties for activists who break into airports.

Climate activities blocked flights at Hamburg and Duesseldorf airports for several hours in July.

In January, Last Generation - known for gluing themselves to streets to block traffic which has infuriated many Germans - said it would abandon the tactic and move on to holding what it calls "disobedient assemblies."

Their actions have been widely criticized, and Chancellor Olaf Scholz described them as "completely nutty."

CLAIM NO: KB – 2024 -

**IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
B E T W E E N**

- (1) LEEDS BRADFORD AIRPORT LIMITED**
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED**
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED**
- (4) NIAL SERVICES LIMITED**

Claimants

-and-

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)**
- (2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)**
- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)**

Defendants

**FIRST WITNESS STATEMENT OF
ALBERTO MARTIN**

I, Alberto Martin, of London Luton Airport Operations Limited, Luton, LU2 9NU, WILL SAY AS FOLLOWS –

1. I am employed as the Chief Executive Officer of the Second Claimant, London Luton Airport Operations Limited. The Second Claimant operates London Luton Airport, Airport Way, Luton LU2 9LY, serving more than 16 million passengers a year and flying to 130 destinations.
2. I am responsible for devising and delivering the strategy for London Luton Airport and for its performance against that strategy, as well as matters of security and safety.
3. I have read a copy of the witness statements of:-
 - 3.1 Alexander Wright;
 - 3.2 Vincent John Hodder; and
 - 3.3 Nicholas Jones.
- 3.4 Unless otherwise specified, I have adopted in this statement the definitions used in the witness statement of Mr Hodder.
4. I make this witness statement in support of the application for injunctions at Leeds Bradford Airport, London Luton Airport and Newcastle International Airport made jointly by the Second Claimant and:
 - 4.1 the First Claimant which operates Leeds Bradford Airport; and
 - 4.2 the Third Claimant which operates Newcastle International Airport.
- 4.3 The Second Claimant seeks an injunction in respect of London Luton Airport, shown edged red on Plan 2 attached to the Claim Form.
5. The facts and matters set out by me in this witness statement are either known by me directly and are true, or are known by me indirectly and are believed to the best of my knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief. This statement was prepared through email correspondence and discussions with the Claimants' legal representatives. I am duly authorised by the Second Claimant to make this statement.
6. There is exhibited to this statement a bundle of documents marked **AM1**.
7. I confirm the witness statement of Mr Hodder to be true and accurate in so far as it relates to matters relating to the Second Claimant and London Luton Airport, historic direct action at various airports and the imminent threat of direct action by JSO, XR and other environmental activist groups.

8. Many of the matters referred to in the witness statement of Mr Hodder apply to the Second Claimant and London Luton Airport. To avoid duplication of such matters, I do not repeat these matters in my statement but rather refer to them as applicable and identify and describe the extent of any differences between Leeds Bradford Airport and London Luton Airport.
9. For ease, I adopt a similar structure in this witness statement to that adopted in the witness statement of Mr Hodder.
10. I should say at the outset that the Second Claimant is not trying to prohibit or restrain peaceful and lawful protest, and accept that this is a fundamental and important human right. The Second Claimant seeks only to restrain protest activity that goes beyond that which is peaceful and lawful.

SECTION 1: LONDON LUTON AIRPORT – BUSINESS OVERVIEW

11. London Luton Airport is the fourth largest airport in London. Over 16 million passengers pass through London Luton Airport every year to reach a wide range of domestic and international destinations. We directly facilitate 8 commercial airlines to serve the leisure and business market, and operate a “fixed base” operation for several private jet operators.
12. During July, August and September 2024, we expect to service between 45,000 to 60,000 travelling passengers each day.
13. Approximately 950 members of staff are employed directly by the Second Claimant. In addition, over 8,000 people are employed across the airport including by our business partners.
14. London Luton Airport and its facilities operate 24 hours per day. The airport is incredibly busy, particularly at the start of the day, and there is always a constant stream of people accessing the airport, such that free access to the airport is required at all times to ensure that operations at the Airport can run, and that the surrounding road network remains free-flowing and is not adversely impacted due to restricted access at the airport.
15. London Luton Airport has one runway which is used by private jet operators and our 8 commercial airlines for take-off and landing. If the runway is blocked, the airport cannot operate and flights are diverted, delayed and may be cancelled.

SECTION 2: PRIVATE JET OPERATIONS

16. London Luton Airport provides private aviation services and facilities to two private jet operators, which are located at a different location to the main passenger terminal.

17. There are approximately 28,000 private charters movements at London Luton Airport per year, making up a significant proportion of the daily movements at the airport.
18. I am including this information relating to our private jet operations as some of the more recent protests by Just Stop Oil ("JSO") and Extinction Rebellion have targeted private jets. With London Luton Airport having multiple private charters a day, the Second Claimant is concerned that this will increase the risk of it being the target of protestor action and any blockage to the runway will disrupt both private jet operations and the operation of London Luton Airport generally.

SECTION 3: ACCESS TO LONDON LUTON AIRPORT

19. The nature of London Luton Airport is such that members of the general public have a licence to enter for the purposes of air travel or directly related purposes (such as dropping-off and picking-up those who are travelling). Individuals do not generally have a licence to enter for other purposes. They certainly have no licence to enter for the purpose of carrying out a protest or direct action. That much is obvious from the fact that such conduct may actively interfere with (and deliberately so) the primary activity of the airport and (2) the fact that it is prohibited by the Byelaws at London Luton Airport (see below).

SECTION 4: STATUTORY OBLIGATIONS ON AIRPORT OPERATORS

20. As is more particularly described in the witness statement of Mr Hodder, the Second Claimant is the persons who has the management of London Luton Airport, for the purposes of being an "airport operator" under the Airports Act 1986.
21. I confirm that London Luton Airport is subject to the regulations detailed in the witness statement of Mr Hodder and that the same apply to it.

SECTION 5: LONDON LUTON AIRPORT BYELAWS

22. The Second Claimant exercised the powers conferred on it by section 63 Airports Act 1986 and made the London Luton Airport Byelaws 2021 ("**the London Luton Airport Byelaws**"). A copy of the London Luton Airport Byelaws are attached to this statement at the **Exhibit** marked "**AM1**". They apply to an area outlined in red on the plan to the byelaws which shows the airport boundary.
23. Everyone who visits London Luton Airport (including employees and members of the public) is subject to the London Luton Airport Byelaws. In headline terms, the London Luton Airport Byelaws set out acts which are prohibited and others for which permission is required.
24. London Luton Byelaw 2.24 provides:

2.24 No person shall remain on the airport or any part thereof, after having been requested to leave by an airport official or by a constable, and no airport official or

constable shall request a person to leave unless he has reasonable grounds to believe that that person has committed or is about to commit a breach of a byelaw or a criminal offence.

25. London Luton Byelaw 2.16 provides:

2.16 No person shall organise or take part in any public assembly, demonstration or procession likely to obstruct or interfere with the proper use of the airport or obstruct or interfere with the comfort and convenience or safety of passengers or persons using the airport.

26. Other potentially relevant London Luton Byelaws include the following:

2.1 No person shall tamper with any aircraft or anything that causes, or is likely to cause, damage to or interfere with the safe running or security of any aircraft.

2.3 No person shall enter or get on or attempt to enter or get on any vehicle or item of plant, machinery or other piece of equipment without permission.

2.12 No person shall climb any wall, fence, barrier, railing, post, ladder or tower without permission.

2.21 No person shall loiter on, frequent or remain on the airport or any part thereof without reasonable cause.

2.24 No person shall remain on the airport or any part thereof, after having been requested to leave by an airport official or by a constable, and no airport official or constable shall request a person to leave unless he has reasonable grounds to believe that that person has committed or is about to commit a breach of a byelaw or a criminal offence.

2.26 No person shall distribute or display signs, advertisements, circulars or other printed or written matter without permission.

SECTION 6: ENFORCEMENT OF THE LONDON LUTON AIRPORT BYELAWS

27. I am not aware of specific instances of the London Luton Airport Byelaws being enforced in respect of acts of protests at London Luton Airport. However, Bedfordshire Police has confirmed that its general approach to criminal acts committed at London Luton Airport is to rely on both public order offences and breaches of the London Luton Airport Byelaws to arrest individuals if appropriate to do so.
28. I am aware that the Public Order Act 2023 has relatively recently come into force and that some of the acts carried out in relation to airport protests might be capable of being prosecuted under that legislation (such as sections 1, 2 and 7).

SECTION 7: SECURITY AND HEALTH AND SAFETY

Security – Usual Arrangements at London Luton Airport

29. Like Leeds Bradford Airport, London Luton Airport has strict security measures in place for all individuals (and vehicles) who seek to access airside. This can cover both passengers who are travelling through London Luton Airport to another destination, but also staff who work airside, and vehicles which are needed to operate or provide a

service airside. Under the Aviation Security Act 1982 no one is permitted to access a security restricted area airside if they do not have the permission of the airport operator (which is conditioned at London Luton Airport on each person having undergone and passed these security checks).

30. In addition to the security checks, London Luton Airport also has:
- 30.1 bollards across the coach parking area outside of the terminal front;
 - 30.2 security fencing and barriers blocking access to the goods in yard. All goods going airside are passed through separate security scanners and are collected by staff who are already cleared to be airside; and
 - 30.3 24-hour CCTV in operation across the Airport with vehicle recognition cameras capturing vehicles accessing some of the car parks.
31. Each passenger must show their boarding pass in order to proceed to the security checks, and each staff member or contractor must have a valid airport ID card. Anyone who has a temporary pass must be escorted at all times.
32. In 'normal' times, the security arrangements in place at London Luton Airport are those set out above. These arrangements apply 24 hours a day.

Security – Enhanced Arrangements at London Luton Airport

33. The Second Claimant recognises that it cannot simply expect the Police and the Courts to deal with the risk of protest, and that it too must be proactive in mitigating the apprehended harm.
34. With that in mind, and in preparation and anticipation of protests, I confirm the Second Claimant has taken broadly similar or equivalent steps to those which the First Claimant has taken at Leeds Bradford Airport (as described in the witness statement of Mr Hodder) to try and mitigate the apprehended harm (save that it is not intending to train members of staff to potentially intervene and arrest a protestor(s)). In the interests of avoiding duplication, I do not set these out here in full.

Health & Safety

35. In view of the statutory requirements, the Second Claimant is responsible for the safety and security of our staff and passengers who use the airport as well as the smooth operation of scheduled flight activity at the airport.
- 35.1 There are a number of features of London Luton Airport which make it a target for protestors including environmental protestors. These are similar to the features described in the statement of Mr Hodder. In the interests of avoiding duplication, I do not set these out here in full, but can confirm that the Second Claimant has similar features at London

Luton Airport, with the exception that no airbridges are used at London Luton Airport. This means that all passenger movements between the terminal building and aircraft stands are a mix of bussing and foot movements, which increases the risk of interaction between passengers and protestors.

36. Mr Hodder describes the health and safety risks associated with a protest at the airport and I can confirm the same risks will apply to London Luton Airport.

SECTION 8: OPERATIONAL DISRUPTION AND FINANCIAL/NON-FINANCIAL HARM

37. In addition to health and safety concerns, it is apprehended that a protest at London Luton Airport would result in financial and non-financial harm, operational disruption and disruption and delay to members of the public.
38. In the event of a protest at London Luton Airport, I can confirm that the Second Claimant will suffer similar financial, non-financial and operational harm as those set out in the witness statement of Mr Hodder. In the interests of avoiding duplication, I do not set these out here in full.
39. With respect to London Luton Airport specifically, however I would note:-
- 39.1 the Second Claimant forecasts that during July, August and September 2024 it will service between 45,000 and 60,000 passengers each day. The Second Claimant will still incur its usual costs but will lose revenue;
- 39.2 the Second Claimant may also be subject to customer complaints if customers cannot gain access, and may be required to reimburse customers for their inability to use pre-booked services such as meet and greet, car parking or Fast Track access; and
- 39.3 the loss of revenue to the Second Claimant arising from London Luton Airport closing for a day could be in the region of £450,000-£850,000 per day from lost passenger related income.
40. If, as a result of JSO's direct action, the airport becomes extremely busy with people waiting in the terminals for delayed flights, the car parks and subsequently the roads around London Luton Airport, including the M1 motorway, are likely to become congested.
41. I anticipate that the Second Claimant will need to be assisted by a presence from its local police force (Bedfordshire Police) throughout any protests - especially if protestors are gluing themselves to the runway. This will be a drain on police resources and, depending on the scale of the protest and the severity of the activity, could be a significant drain.

SECTION 9: THREAT OF DIRECT ACTION

42. The witness statements of Alexander Wright and Mr Hodder sets out the background to the JSO campaign of direct action targeting airports this summer.
43. I do not repeat the comments made in such statements here, but would note that JSO’s campaign to target UK airports has started and so there is a genuine risk of protest at London Luton Airport.
44. In addition, London Luton Airport is the subject of a current application by London Luton Airport Limited (trading as Luton Rising) to obtain a Development Consent Order to expand the airport to 32 million passengers per annum. The proposed expansion has been the subject of a number of protests at the airport and in the local area. Some of these protests are listed in the table below (URL links to the press articles).

| | |
|-----------------|--|
| 18 January 2020 | Extinction Rebellion protesters demonstrated from London Luton Airport to the Luton town centre against the expansion of the airport Extinction Rebellion take to Luton streets for environmental protest (lutontoday.co.uk) |
| 29 August 2020 | Extinction Rebellion protesters accessed the terminal at the airport to unveil banners and subsequently protested on a roundabout on the entrance road to the airport Extinction Rebellion stage protest at Luton Airport - demanding end to expansion plans (lutontoday.co.uk) |
| 2 December 2021 | Protesters interrupted a local authority meeting and shouted their opinions against the expansion of the London Luton Airport Luton Airport expansion protesters interrupt meeting to slam approved plans as 'disgrace' - Bedfordshire Live |
| 30 May 2024 | Luton Green Party, Stay Grounded and Luton Friends of the Earth protested outside of Luton’s main train station and in the town centre during the Radio 1’s Big Weekend festival 'Don't back Luton airport expansion' protesters tell festival goers attending Big Weekend (lutontoday.co.uk) |

45. Copies of the media articles referred to above are attached to this statement at the **Exhibit** marked **“AM2”**.

46. London Luton Airport has in the past permitted protesters to use a designated area outside of the terminal front for a peaceful protest subject to the protestors complying with instructions issued by the Second Claimant. However, the Second Claimant has not received any contact from protestors planning or intending to plan a protest at the airport, so it could not agree a similar arrangement (which might not, in any event, be possible).

SECTION 10: APPREHENSION OF FUTURE PROTESTS AND HARM

47. On the basis of the information that I have outlined above and the matters referred to in the witness statements of Mr Wright and Mr Hodder, the Second Claimant reasonably apprehends that London Luton Airport will be a target of unlawful protest activities during the summer of 2024.
48. Further, and in the context set out above, it is reasonably apprehended that the tactics and strategies deployed by the protestors during this apprehended period of protest will mirror those being deployed already by JSO, Last Generation and Extinction Rebellion. Those tactics include protestors accessing critical parts of the airport (including airside), trespass, damage to property, and obstructing access to the taxiways and runway.

SECTION 10: THE BALANCE OF CONVENIENCE / COMPELLING JUSTIFICATION

49. The Second Claimant considers that:
- 49.1 unless an injunction is granted, there is a serious risk of disruption at London Luton Airport this summer. Based on the action at London Stansted, it is very unlikely that JSO will make a public announcement concerning the location, time / date of its protest;
- 49.2 London Luton Airport is an obvious target for protestors given the factors referred to above and in the witness statement of Mr Hodder and, additionally, given that the airport has already been the subject of protests due to its expansion plans;
- 49.3 damages would not be an adequate remedy for the Second Claimant for the reasons set out above and in the witness statement of Mr Hodder;
- 49.4 conversely, since the Order which the Second Claimant seeks is only to prevent unlawful activity, there is no question of anyone in the class of Persons Unknown suffering any actionable loss or needing compensation in damages; and
- 49.5 for the reasons set out in Mr Hodder's statement and Mr Wright's statement, the grant of an injunction to restrain disruption would provide an effective deterrent for activists who might otherwise contemplate direct action (given that the

breach of such an Order would carry the risk of imprisonment for contempt of court).


SECTION 12: CROSS-UNDERTAKING IN DAMAGES

50. Although I cannot foresee any way in which anyone affected by the injunction could suffer loss or damage, I am authorised on behalf of the Second Claimant to provide the necessary cross-undertaking to pay any sum which the Court considers appropriate to compensate anyone affected by the proposed injunction if it is subsequently determined that the Second Claimant is not entitled to the order which it seeks.
51. The audited accounts for the Second Claimant year ending 31 December 2023 show the following:-

| Revenue for the year ending 31.12.23 | Profit for the year ending 31.12.23 | Balance Sheet as at 31.12.23 |
|---|--|---------------------------------|
| £296,584,000 | £67,779,000 | £125,548,000 |

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 behalf of the Second Claimant.



.....

ALBERTO MARTIN

Dated this 15th day of July 2024

IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
B E T W E E N

- (1) LEEDS BRADFORD AIRPORT LIMITED
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
- (4) NIAL SERVICES LIMITED

Claimants

-and-

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 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 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 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL 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

AM1

This is the exhibit marked “AM1” referred to in the witness statement of Alberto Martin.



London Luton Airport Byelaws

November 2005

LONDON LUTON AIRPORT OPERATIONS LIMITED BYELAWS

London Luton Airport Operations Limited, in exercise of the powers conferred on it by sections 63 and 64 of the Airports Act 1986 and of all other powers enabling it in that behalf, hereby makes the following byelaws.

PART 1 GENERAL

1.1 Definitions

(a) In these byelaws:

- (i) "accident" means an unintended occurrence which has an adverse physical result;
- (ii) "aircraft" means a heavier than air power-driven flying machine and includes aeroplane (land plane), aeroplane (sea plane), aeroplane (amphibian), aeroplane (self-launching motor glider), powered lift (tilt rotor) and rotorcraft (helicopter and gyroplane);
- (iii) "aircraft operator" and "operator" mean in relation to any aircraft the person who at the relevant time has the management of that aircraft;
- (iv) "the airport" means that area for the time being constituting London Luton Airport including all areas accessible to aircraft including runways, taxiways, aprons and all grass areas as detailed within the area edged red on the map attached to these byelaws and marked "Map referred to in the London Luton Airport Byelaws 2005"
- (v) "airport official" has the same meaning as in section 63(4) of the Airports Act 1986;
- (vi) "airside area" means that part of the airport lying within the perimeter fence to which access is controlled by security check points and any other authorised entry point and including all stands, aprons, taxiways and the runway;
- (vii) "animal" means any animal wild or domesticated that is brought onto the airport;
- (viii) "authorised person" means any person authorised by law or by an airport official to enter the airport or any part thereof in the course of his duties provided he is entitled to and displays a valid and full access pass issued by LLAOL;
- (ix) "banksman" means any airport official whilst engaged in assisting the driver of any vehicle with visual guidance;
- (x) "CAP 74" means the document issued by the Civil Aviation Authority known as CAP 74 relating to fire prevention and safety measures in the fuelling of aircraft and "CAP 642" means the document also issued by that Authority relating to airside safety management procedures known as CAP 642. Each such reference shall be construed as a reference to that document as amended, reissued, consolidated or replaced and in force from time to time;
- (xi) "commander" in relation to an aircraft means the member of the flight crew designated as commander of that aircraft by the operator thereof, or, failing such a person, the person who is for the time being the pilot in command of the aircraft;

- (xii) "constable" means any person attested as such pursuant to section 29 of the Police Act 1996;
- (xiii) "cultivated area" means any grassed area at the airport and any place at the airport (whether or not situated within a grassed area) in use or laid out for use as a place for the cultivation and display of flowers and/or any shrub;
- (xiv) "Customs and Excise Acts" has the same meaning as in the Customs and Excise Management Act 1979;
- (xv) "designated" means that LLAOL has indicated by markings on the ground, the display of a notice or the issue of a written notification that LLAOL gives permission for the use of that area or facility for a particular purpose;
- (xvi) "designated agent" means any party occupying and managing premises at the airport and being designated as a party authorised to administer lost property;
- (xvii) "emergency services" means the police, security, fire and ambulance services, including any such service provided by LLAOL;
- (xviii) "emergency vehicle" means any vehicle lawfully in use for operational purposes by any of the emergency services;
- (xix) "the facilities associated with the airport" includes all facilities provided at or in the vicinity of the airport (including radio and navigational aids) for the purpose of controlling, guiding or assisting the operation of aircraft either at the airport or in the vicinity of the airport;
- (xx) "incident area" means any area within the airport that has been cordoned off from the rest of the airport by or at the direction of an airport official or a member of the emergency services;
- (xxi) "LLAOL" means London Luton Airport Operations Limited or its successors in title and, where the context of these byelaws so requires, it shall include reference to an airport official;
- (xxii) "lost property office" means any place designated by LLAOL for the safekeeping of lost property;
- (xxiii) "maximum total weight authorised" has the same meaning as in the Air Navigation Order 2000 (SI 2000/1562);
- (xxiv) "night-time" means the period of time commencing at 2300 hours local time each day and ending at 0600 hours local time on the following day unless the following day is a Sunday in which case the period shall end at 0700 hours;
- (xxv) "notice" means any object or device (whether fixed or portable) for conveying warnings, information, requirements, restrictions or prohibitions of any description;
- (xxvi) "permission" means the prior consent of LLAOL except where the context otherwise requires;
- (xxvii) "refuelling bowser" means a mobile receptacle for the storage of fuel and the transfer of the same to an aircraft or a vehicle;

(xxviii) "road traffic enactments" has the same meaning as in section 63 (3) of the Airports Act 1986;

(xxix) "standing" means an area at the airport designated for use as a taxi stand;

(xxx) "taxi" means a hackney carriage licensed under section 37 of the Town Police Clauses Act 1847 by Luton Borough Council;

(xxxi) "vehicle" means any mechanically propelled conveyance or manually operated apparatus on wheels and includes trailers, items of plant that operate as wheeled vehicles and as static apparatus but does not include an aircraft.

(b) These byelaws may be cited as the London Luton Airport Byelaws 2005.

1.2 **Extent**

Except as provided in Part 3, these byelaws shall apply throughout the airport.

1.3 **Information**

A person shall state his correct name and address and the purpose of his being on the airport, if so requested by an airport official or by a constable.

1.4 **Limitation**

No provision in these byelaws shall apply to any member of the emergency services when he is acting in the course of his duty, or to any emergency vehicle being used by any such person so acting.

1.5 **Defences**

In any proceedings under these byelaws, it shall be a defence to prove that the defendant:

(a) acted with lawful authority or reasonable excuse, or

(b) took all due care and exercised all due diligence to avoid the commission of an offence.

1.6 **Authority**

An airport official shall produce his identification pass when making any request pursuant to these byelaws.

PART 2 PROHIBITED ACTS

- 2.1 No person shall tamper with any aircraft or anything that causes, or is likely to cause, damage to or interfere with the safe running or security of any aircraft .
- 2.2 No person shall tamper with any vehicle or item of plant, machinery or other piece of equipment.
- 2.3 No person shall enter or get on or attempt to enter or get on any vehicle or item of plant, machinery or other piece of equipment without permission.
- 2.4 No person shall place an aircraft other than in the place and position designated by LLAOL.
- 2.5 No person shall fail to chock properly or otherwise secure any stationary aircraft not in a hangar.
- 2.6 No person shall without permission fuel, service or maintain (and for the avoidance of doubt this shall specifically include fuelling and de-icing) any aircraft, vehicle or equipment or run any engine in areas other than those designated for such purposes.
- 2.7 No person shall take a vehicle into a hangar used for the maintenance or storage of aircraft without permission of the authorised occupier or his authorised servants, employees or agents.
- 2.8 No person shall tamper with or intentionally misuse any lift, escalator, conveyor belt, power-operated gangway, or any mechanical or electrical or electronic apparatus.
- 2.9 No person shall operate or use any radio transmitter, or other thing capable of radiating or generating electrical interference, in such a way as to prejudice the operation of any air traffic control service, including but not limited to communications or navigation systems at the airport.
- 2.10 No person shall tamper with or intentionally misuse any telephone or other apparatus provided for transmitting and receiving messages.
- 2.11 No person shall fail to comply with any notice erected and displayed by LLAOL prohibiting or restricting access to any building, road or any other part of the airport.
- 2.12 No person shall climb any wall, fence, barrier, railing, post, ladder or tower without permission.
- 2.13 No person shall obstruct any person acting in the execution of his duty in relation to the operation of the airport including, without prejudice to the foregoing, the conveyance of passengers, their baggage and other goods and the maintenance and servicing of aircraft.
- 2.14 No person shall sing, dance, shout, play a musical instrument or erect or use any apparatus for transmission, receipt, recording, reproduction or amplification of sound, speech or images after being ordered to cease such activity by LLAOL.
- 2.15 No person shall consume, or continue to consume, alcohol at the airport when requested by an airport official or a constable to desist and no person shall in any event be in such a state of intoxication at the airport as may cause distress or offence to any other person.

- 2.16 No person shall organise or take part in any public assembly, demonstration or procession likely to obstruct or interfere with the proper use of the airport or obstruct or interfere with the comfort and convenience or safety of passengers or persons using the airport.
- 2.17 No person shall walk on any cultivated area.
- 2.18 No person shall drop any litter.
- 2.19 No person shall fail to keep any animal under control or permit a dog to foul a footpath or a building, or fail to keep a dog on a leash.
- 2.20 No person shall enter or leave the airport otherwise than through a gate or entrance or exit for the time being provided for that purpose.
- 2.21 No person shall loiter on, frequent or remain on the airport or any part thereof without reasonable cause.
- 2.22 No person shall allow any vehicle, animal or thing to be on the airport after having been required to remove it, or after its presence on the airport has been forbidden by an airport official or a constable, and no airport official or constable shall forbid the presence of any vehicle, animal or thing unless he has reasonable grounds to believe that its presence has been responsible for or is about to be responsible for the breach of a byelaw or for a criminal offence.
- 2.23 No person shall, without prejudice to byelaw 2.24, enter the airport, except as a bona fide airline passenger or in some other authorised capacity, after he has been served by an airport official with notification in writing by post, by facsimile transmission or by other similar means which produce a document containing the text of the communication withdrawing any licence he may have to enter the airport.
- 2.24 No person shall remain on the airport or any part thereof, after having been requested to leave by an airport official or by a constable, and no airport official or constable shall request a person to leave unless he has reasonable grounds to believe that that person has committed or is about to commit a breach of a byelaw or a criminal offence.
- 2.25 No person shall without permission sell or distribute anything, offer anything for sale or hire or make any offer of services for reward.
- 2.26 No person shall distribute or display signs, advertisements, circulars or other printed or written matter without permission.
- 2.27 No person shall beg or solicit funds or contributions of any kind without permission.
- 2.28 No person shall without permission enter any car park (except as a bona fide airline passenger or other user of the airport or as an employee of LLAOL or an authorised person) for the purposes of parking or collecting a private motor vehicle.
- 2.29 No person shall deposit any waste or refuse container on any part of the airport without permission.
- 2.30 No person shall, in the course of business, take photographs or participate in filming or sound recording at the airport without permission.

- 2.31 No person shall trap wild fauna or remove any wild flora without permission.
- 2.32 No person shall ride a horse or engage in field sports.
- 2.33 No person shall smoke in or otherwise bring into or light any naked flame or create sparks in:
- (a) any place where any such act is prohibited by notice.
 - (b) notwithstanding (a) above, any area not already indicated as a "no-smoking area" which is within 15 metres of any aircraft or of any place where liquid fuel, gas, explosives or other highly flammable material is stored or used.
- 2.34 No person shall light a fire without permission and any permitted fire must be in a place constructed for that purpose.
- 2.35 No person shall without permission fill or discharge liquid fuel from any container, including any part of a vehicle, elsewhere than in a place designated for that purpose by LLAOL.
- 2.36 No person shall fail to evacuate any part of the airport when instructed to do so by an authorised person or a member of one of the emergency services acting in accordance with his employment in any emergency.
- 2.37 No person shall without the written permission of LLAOL store or supply fuel or lubricants for aircraft using the airport.
- 2.38 No person shall enter or attempt to enter any airside area without first obtaining security clearance from LLAOL.
- 2.39 No person shall drive on any apron without first obtaining a valid apron driving permit from LLAOL, unless that person is escorted at all times by the holder of such a permit.
- 2.40 No person shall store or handle hazardous substances in a condition or manner likely to result in a discharge prohibited under byelaw 2.41.
- 2.41 No person shall cause or permit the discharge of any hydrocarbon (whether in the form of grease, oil, fuel or spirit) or other deleterious matter (whether of a solid, liquid or gaseous nature) or of any other substance of whatever nature which might obstruct or be or become a source of damage to drains, sewers or other infrastructure or which may constitute a risk to the environment or public health.
- 2.42 No person, other than a bona fide inbound or outbound passenger, shall enter or work in an airside area, without wearing high-visibility clothing to the standard designated by LLAOL from time to time or such other personal protective equipment as meets prevailing statutory requirements.
- 2.43 No person shall engage in any work in relation to any aircraft other than in a manner which complies with CAP 74.
- 2.44 No person shall remain in an incident area after receiving an instruction immediately to leave that area from an authorised person or from any other person in charge of an emergency vehicle and that person shall not leave any vehicle or other property under his control in such an area when so instructed.

- 2.45 No person shall use any language or make any gesture or commit any other act which is lewd, foul or offensive.
- 2.46 No person shall pass on foot or drive a vehicle behind an aircraft while it is displaying collision lights indicating that it is about to push back.
- 2.47 No person in charge of a vehicle shall reverse that vehicle up to an aircraft without the use of a banksman.
- 2.48 No person shall obstruct the passage of an aircraft refuelling bowser.
- 2.49 No person in charge of a bus or coach shall carry any number of passengers in excess of the number of seats and straps for the use of standing passengers in the bus or coach.
- 2.50 No person shall escort passengers upon any part of the airside area other than in a manner which complies with the provisions of the airside safety management procedures contained in CAP 642.

PART 3 PROHIBITED ACTS INVOLVING VEHICLES

This Part of these byelaws extends only to the parts of the airport to which the road traffic enactments do not apply.

- 3.1 No person shall drive a vehicle otherwise than on a road or area designated by LLAOL for the driving or parking of vehicles.
- 3.2 No person shall drive a vehicle without due care and attention or without reasonable consideration for other persons.
- 3.3 No person shall drive a vehicle at a speed in excess of:
- (a) fifteen miles per hour in the area between Stands 1 to 9L,
 - (b) twenty miles per hour on any other part of the airside area or such other area as may by notice be designated from time to time by LLAOL, or
 - (c) in respect of any part of the above areas such other speed limit as may by notice be designated from time to time by LLAOL.
- 3.4 No person who is under the influence of drink or drugs or other intoxicating substance shall drive or attempt to drive a vehicle.
- 3.5 No person shall fail or refuse to comply with an indication or direction given by either a traffic sign or a road marking or an airport official or a constable.
- 3.6 No person, other than an authorised person acting in the course of his duty, shall wait in, leave or park a vehicle:
- (a) in excess of the published waiting time limit in any area where waiting is restricted by notice erected by LLAOL,

(b) in any area reserved by LLAOL for the use of a particular person or group of persons, or

(c) in any area not specifically allocated for the parking of vehicles.

3.7 No person shall drive a vehicle or operate an item of plant, machinery or other piece of equipment which is not in a roadworthy or safe condition.

3.8 No person shall drive or leave any vehicle or item of plant, machinery or other piece of equipment which is not properly lit in accordance with the lighting requirements applicable to roads to which the road traffic enactments apply.

3.9 Where any accident involving an aircraft occurs:

(a) if present at the time of the accident the aircraft commander (or, if the aircraft is being towed, the tug-driver) shall stop and give:

- (i) his name and address;
- (ii) the name and address of the person who was the operator of the aircraft at the time of the accident;
- (iii) the identification marks of the aircraft; and
- (iv) details of the accident

to an airport official or a constable or any other person having reasonable grounds for requiring them, as soon as practicable but, in any case, no later than 24 hours after the accident;

(b) the driver of any vehicle involved shall stop and give:

- (i) his name and address;
- (ii) the name and address of the owner of the vehicle;
- (iii) the registration number or identification marks of the vehicle; and
- (iv) details of the accident

to an airport official or a constable or any other person having reasonable grounds for requiring them, as soon as practicable but, in any case, no later than 24 hours after the accident.

3.10 No person shall fail to:

(a) stop after having been involved in a traffic accident resulting in personal injury to another person, or damage to another vehicle or to any other property constructed on, fixed to, growing in or otherwise forming part of the land on which the road in question is situated or land adjacent to such land, or

(b) report the details of the accident to an airport official or a constable immediately or as soon as practicable thereafter.

3.11 No person shall drive without a valid driving licence, or without insurance or such a security in respect of third party risks as complies with the requirements of Part VI of the Road Traffic Act 1988.

3.12 No person shall leave any engine of a vehicle, or item of plant, machinery or other piece of equipment running when not in operational use.

3.13 Priority shall be given at all times to emergency vehicles by persons in charge of other vehicles.

PART 4 TAXIS

- 4.1 No person shall cause or permit any vehicle to be used as a hackney carriage plying for hire on the airport without a permit for that purpose issued by LLAOL and a licence having been obtained for the vehicle under section 37 of the Town Police Clauses Act 1847 from Luton Borough Council.
- 4.2 No person shall park or stand a taxi on any part of the airport for the purpose of plying for hire without a permit for that purpose issued by LLAOL displayed in the vehicle.
- 4.3 No driver of a taxi at the airport shall fail to wear in such a position and manner as to be plainly and distinctly visible, a valid hackney carriage driver's identity card issued by LLAOL.
- 4.4 No person shall park or stand a taxi for the purpose of plying for hire in any area other than the standings.
- 4.5 No person shall, without permission, in the terminal building or other public building, offer his or any other vehicle for hire.
- 4.6 No person shall park or stand a taxi on any standing when the maximum number to stand thereon shown by a notice erected by LLAOL at the head of the standing is thereby exceeded.
- 4.7 No person shall leave a taxi unattended at any time.
- 4.8 No person shall wash down or clean out a taxi whilst it is on a standing.
- 4.9 No person shall carry out any repair or maintenance work to a taxi whilst it is on a standing.

PART 5 CONTROL OF AIRCRAFT NOISE

5.1 Flight Procedure

- 5.1.1 Whilst within or directly above the airport, the commander of an aircraft which is landing at or taking-off from the airport, or which is using any of the facilities associated with the airport, shall use the airport or the facilities associated with the airport so as to ensure at all times that such aircraft is operated in a manner calculated to cause the least disturbance practicable.
- 5.1.2 Whilst within or directly above the airport, the commander of a jet aircraft taking off from the airport after a noise abatement power reduction shall maintain a rate of climb of at least 500 feet per minute at power settings which will ensure progressively decreasing noise levels at points on the ground under the flight path.
- 5.1.3 Whilst within or directly above the airport the commander of an aircraft shall not use the airport or the facilities associated with the airport for the purpose of flying training at night-time or on Sundays.

5.1.4 Flying training carried out by the commander of an aircraft shall be subject to the following conditions:

- (a) permission shall be obtained either before departure by telephone communication with Apron Control or (in exceptional circumstances only) by consultation with Apron Control whilst in flight.
- (b) training circuits by all jet aircraft and by all propeller-driven aircraft whose maximum total weight authorised exceeds 5,700 kilograms shall be right hand when using Runway 08 and left hand when using Runway 26, and the minimum circuit height at the airport shall be 1,500 feet above aerodrome level unless otherwise instructed by Air Traffic Control.
- (c) the minimum circuit height at the airport for all jet aircraft and for all propeller-driven aircraft whose maximum total weight authorised does not exceed 5,700 kilograms shall be 1,000 feet above aerodrome level.

5.1.5 The operator or commander of any aircraft shall ensure that no jet aircraft shall take-off or land at night-time without notification having first been given by LLAOL that the take-off or landing is within the limit on the number of movements from time to time determined by LLAOL. Such notification is not required for

- (a) the landing at night-time of jet aircraft diverted to the airport or
- (b) the departure from the airport of such diverted aircraft where that departure is within the number of movements determined by LLAOL and allocated to the operator of that aircraft.

5.1.6 Before operating a jet aircraft of a type not previously operated at the airport by that operator, the operator concerned shall have satisfied LLAOL that the aircraft will be flown into and out of the airport in a manner calculated to cause the least noise disturbance practicable.

5.2 The ground running and testing of the engines of any aircraft shall be carried out only in any area or areas approved from time to time by LLAOL and subject to the conditions set out in the Schedule to these byelaws.

5.3 Any person who departs from any provision of this Part of these byelaws to the extent necessary for the purpose of securing the safety of aircraft in flight or the safety of aircraft, persons or property on the ground shall be deemed not to contravene that provision, but in that event he shall give or cause to be given full details of any such departure in writing to LLAOL within seven days of being required to do so.

PART 6 LOST PROPERTY

6.1 Part 6 of these byelaws shall apply in relation to the safe custody, re-delivery and disposal of any property, animal or thing (except a motor vehicle as defined in section 11 of the Refuse Disposal (Amenity) Act 1978) which, while not in proper custody, is found on any part of the airport to which the public have access or in any vehicle owned or operated by or on behalf of LLAOL but excluding any property, animal or thing found on board an aircraft in a taxi or on premises let by LLAOL.

6.2 Subject to the provisions of the Customs and Excise Acts any person other than a member of staff of the airport company, an airport official or a constable who finds property to which these byelaws apply shall forthwith hand it in the state in which he found it to a member of staff of the airport company, an airport official, a constable or a designated agent and inform that person of the place and circumstances in which it was found.

- 6.3 (a) Subject to any provisions of the Customs and Excise Acts and to paragraph (b) any member of staff of the airport company, airport official or constable to whom property is handed pursuant to byelaw 6.2 or who himself finds any property to which these byelaws apply shall, as soon as reasonably practicable and in any case before leaving the airport, deliver such property for safe custody in the state in which it came into his possession to the lost property office or to a designated agent and inform a member of staff of the airport company or airport official at the lost property office or a designated agent of the circumstances in which it was found.
- (b) If before any lost property shall have been delivered for safe custody to the lost property office or a designated agent under this byelaw it is claimed by a person who satisfies the member of staff of the airport company or airport official or constable as the case may be that he is the true owner, it shall be returned to that person forthwith without fee on giving his name and address to the member of staff of the airport company or airport official or constable who shall as soon as possible report the facts and give the claimant's name and address and a description of the lost property to the lost property office or a designated agent.

- 6.4 Any lost property delivered to the lost property office shall be retained in safe custody by LLAOL until claimed by the owner thereof or disposed of in accordance with these byelaws and LLAOL shall keep for a period of not less than 12 months a record showing particulars of the lost property (whether delivered to the lost property office or a designated agent or disposed of pursuant to the provisions of byelaw 6.3), the circumstances in which it was found and recording the ultimate disposal of the property.

Provided that:

- (a) any official document, including a licence or passport shall, wherever practicable, be returned forthwith to the appropriate government department, local authority or other body or person responsible for issuing it or for controlling or dealing with it;
- (b) where the name and address of the owner of any lost property, other than the documents referred to in the preceding proviso, are readily ascertainable LLAOL shall forthwith notify the owner that the lost property is in its possession and may be claimed in accordance with these byelaws.
- 6.5 If any lost property, while it is retained by LLAOL in safe custody, is claimed and the claimant proves to the satisfaction of LLAOL that it belongs to him and he gives his name and address to the lost property office, it shall be handed to him at the lost property office (or such other location as shall be notified) upon payment of such storage and administration charges as shall be calculated by reference to LLAOL's standard prevailing rates or (if upon request LLAOL shall deem it appropriate having regard to size and weight and subject to the payment of such storage and administration charges as aforesaid and a reasonable additional sum to cover postage and packaging) sent to the claimant by first class mail (if practicable) or otherwise by parcel post.
- 6.6 (a) If any lost property deemed by LLAOL to be of more than negligible value and retained by LLAOL for safe custody is not re-delivered to a person pursuant to byelaw 6.5 within three months of the date when it was delivered to the lost property office, LLAOL shall notify the finder in writing offering it for sale to the finder at such reasonable price as shall be specified in the notification. If the finder shall within fourteen days from (and including) the date of service of the notice pay the purchase price to LLAOL, LLAOL shall cause the relevant item of lost property to be delivered to the finder in the most appropriate manner at the risk of the finder. If the finder does not so respond within the above-mentioned time limit of fourteen days LLAOL shall use reasonable endeavours to sell it for the best

price reasonably obtainable, and if it shall not have been able to do so within a further two months LLAOL shall be free to dispose of it as it thinks fit.

- (b) Notwithstanding the foregoing provisions of these byelaws, if any lost property retained by LLAOL is of negligible value and if, within fourteen days from the time when it was found, it has not been re-delivered to a person pursuant to byelaw 6.5, LLAOL shall be entitled to sell it at the best price that can be reasonably be obtained or to dispose of it as it thinks fit.
- (c) Notwithstanding the foregoing provisions of these byelaws, if any lost property retained by LLAOL for safe custody is of a perishable nature and if it has not been re-delivered to a person pursuant to byelaw 6.5 within forty eight hours from the time when it was found, LLAOL shall be entitled to re-deliver it to its finder or to sell it at the best price that can reasonably be obtained or in the case of property of negligible value to dispose of it as it thinks fit.
- (d) Notwithstanding the foregoing provisions of these byelaws, any lost property which is or which becomes objectionable may forthwith be destroyed or otherwise disposed of in a reasonable manner.
- (e) A sale under this byelaw shall not prejudice the right, for a period of twelve months from the date on which the property came into the custody of LLAOL, of any true owner whose rights have been divested by the sale to be paid the proportion due to him of the residue of the proceeds of sale after deduction of any charge by LLAOL for the safe custody of the lost property and LLAOL's reasonable costs in connection with the sale.

6.7 Where any lost property is contained in a package, bag or other receptacle LLAOL may cause such receptacle to be opened and the contents examined for the purpose either:

- (a) of identifying and tracing the owner of the property, or
- (b) of ascertaining the nature of the contents.

6.8 Any of the matters contained in byelaws 6.5, 6.6 and 6.7 that may be carried out by LLAOL may be carried out by a designated agent.

PART 7 PENALTIES

7.1 Any person contravening byelaws 2.1, 2.5, 2.9, 2.10, 2.33, 2.34, 2.35, 2.36, 2.37, 2.38, 2.39, 2.40, 2.41, 2.42, 2.43, 2.44, 2.45, 2.46, 2.47, 3.2, 3.4, 3.7, 3.9, 3.10 and 3.13 and any byelaws in Part 5 and the Schedule shall be liable on summary conviction to a fine not exceeding level 4 on the standard scale¹.

7.2 Any person contravening any of the byelaws in Parts 2, 3, 4, and 6 except the byelaws referred to in byelaws 7.1 and 7.3 shall be liable on summary conviction to a fine not exceeding level 3 on the standard scale¹.

7.3 Any person contravening byelaw 4.3 shall be liable on summary conviction to a fine not exceeding level 2 on the standard scale¹.

¹As at the date of these byelaws the relevant levels of the standard scale are, by virtue of section 37(2) of the Criminal Justice Act 1982, as follows:

Level 2 - £500

Level 3 - £1,000

Level 4 - £2,500

These levels are, however, subject to amendment from time to time by statute or by an Order under section 143 of the Magistrates' Court Act 1980.

PART 8 REVOCATION OF BYELAWS

- 8.1 The byelaws which were made by London Luton Airport Limited under sections 63 and 64 of the Airports Act 1986 on the 6th August 1997 and which were confirmed by the Secretary of State for Transport on the 16th October 1997 are hereby revoked.

SCHEDULE

Byelaw 5.2

Ground Running and Testing of Aircraft Engines

1. For all engine runs by jet aircraft, other than runs at ground idle power setting, the operator of the aircraft concerned shall:
 - (a) ensure that the aircraft is positioned in the area prescribed by LLAOL,
 - (b) comply with any instructions or clearance issued by Air Traffic Control before commencement of the run,
 - (c) notify Air Traffic Control by radio at the commencement and cessation of each run.
2. The operator of the aircraft concerned shall ensure that, subject to paragraph 1, the aircraft is positioned in such a manner that the jet blast will not impinge on any runway, taxiway, aircraft, equipment installation or other property of the airport or third party.
3. LLAOL will give permission for an engine run under paragraph 2 between 0800 and 2000 hours local time on Mondays to Saturdays inclusive. In addition, LLAOL may at its absolute discretion grant permission for such runs:
 - (a) between 0600 and 0800 hours and between 2000 and 2300 hours local time on Mondays to Saturdays inclusive, and on Sundays between 1230 and 1800 hours local time, and
 - (b) in respect of aircraft fitted with high by-pass engines at any time.
4. Subject to paragraph 5, the operator of the aircraft and/or its employees, servants or agents as the case may be shall ensure that where a high by-pass engine is fitted to the NN/C (Chapter III) range of aircraft, piston and turbo-prop aircraft, engine runs other than at ground idle power settings are carried out with the engine positioned in the area prescribed by Air Traffic Control and that noise disturbance is kept to the minimum.
5. A single or double engine run at ground idle power settings may be undertaken if:
 - (a) the aircraft is positioned so as to cause no damage or inconvenience to persons or property;
 - (b) the engine run does not exceed 10 minutes;
 - (c) a qualified person is at all times in attendance outside the aircraft to ensure the safety of persons and property during the engine run;

- (d) continuous radio contact is maintained with Air Traffic Control, from whom permission to start the engine(s) must be obtained and to whom notification must be given when the engine run is completed;
- (e) not more than two engines at a time are run; and
- (f) prior to commencing the run the following information is given to LLAOL (Apron Control):
 - (i) the aircraft's registration number or letters;
 - (ii) the aircraft's position on the airport;
 - (iii) the percentage power setting anticipated;
 - (iv) the expected duration of the engine run.



THE COMMON SEAL of LONDON LUTON)
AIRPORT OPERATIONS LIMITED was)
hereunto affixed this 3rd day of October)
2005 in the presence of:-)

Director

Company Secretary

Kathy Lane
R. Ginn

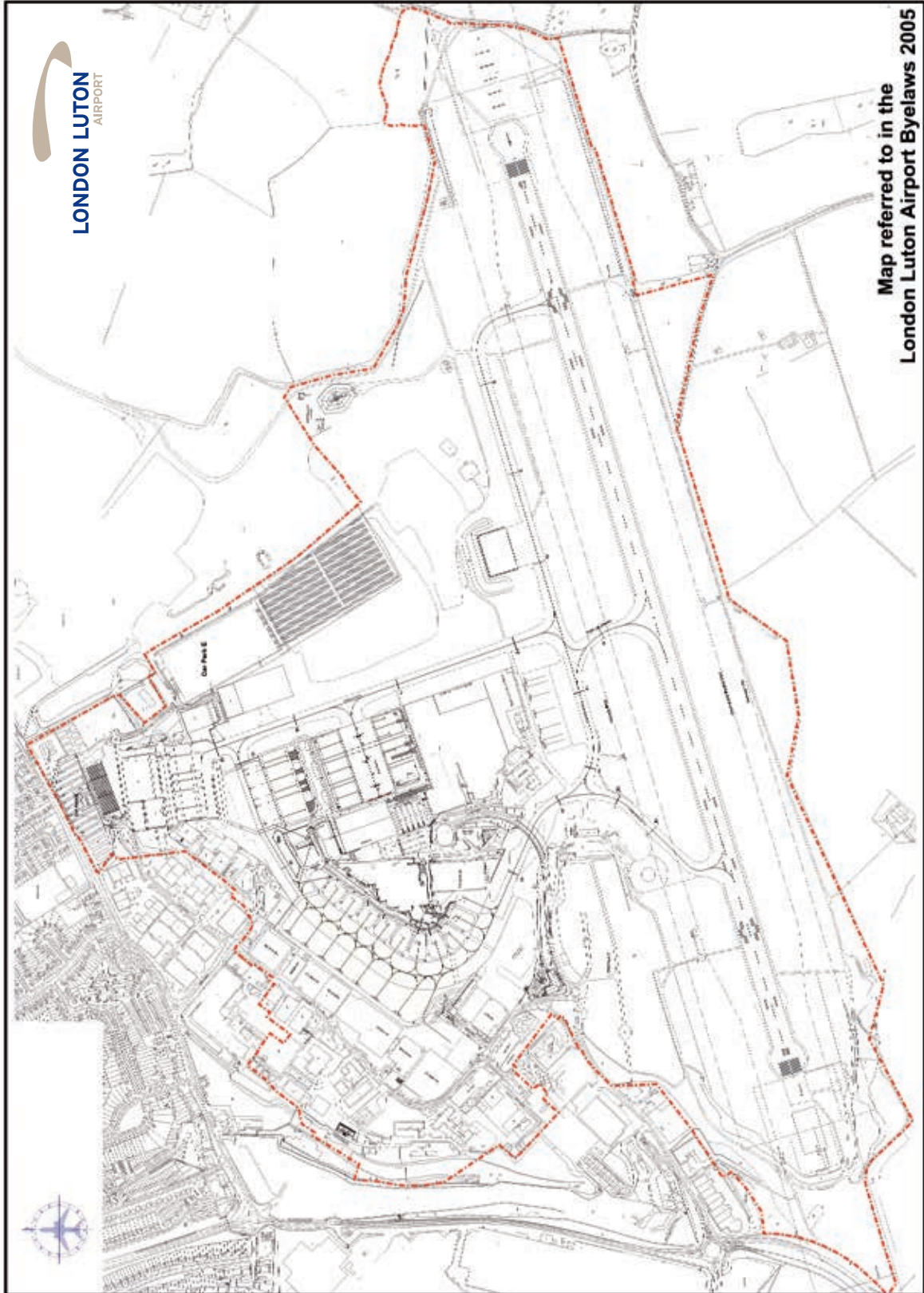
K:\Legal\Vale\LLA-Byelaws
13.6.05

The foregoing byelaws are hereby confirmed by the Secretary of State for Transport and shall come into operation on 20 November 2005

SIGNED BY

Jonathan Sharrock
Head of Airports Policy Division
by authority of the Secretary of State for Transport

17 October 2005



IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
B E T W E E N

- (1) LEEDS BRADFORD AIRPORT LIMITED
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
- (4) NIAL SERVICES LIMITED

Claimants

-and-

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 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 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 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL 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

□M2

This is the exhibit marked “AM□” referred to in the witness statement of Alberto Martin.

Extinction Rebellion take to Luton streets for environmental protest

Extinction Rebellion took to the streets of Luton on Saturday as part of Operation Mad Hatter to raise awareness of the climate crisis.

The group was also protesting against the proposed expansion of London [Luton](#) Airport.

[Extinction Rebellion](#) paraded from the airport to St George's Square in Luton, on Saturday, January 18, they also had samba bands, disobedience dancing and spoke to the audience about the proposed expansion and the climate crisis.

Jim Peacock, from Extinction Rebellion Luton, said: "Saturday's demonstration went very well, we had over 150 people from across the country come and support us.



Extinction Rebellion paraded from London Luton Airport to St George's Square. Photo by Jon Marks

Luton Today | **The Luton News
Herald & Post**

Extinction Rebellion paraded from London Luton Airport to St George's Square. Photo by Jon Marks | other

"We had a procession from the airport down to the town centre and the red rebels attended.

"We were demonstrating about Luton not caring about climate crisis, but recently the council has declared a climate emergency and have set out a plan to reduce carbon emissions in the town, which is really positive.

"But they have not addressed our main concern, and for us the key point, which is the proposed expansion of the airport.

[Hide Ad](#)

[Hide Ad](#)

"We have been to lots of the consultations, as many people in the town have, and we have voiced our opinion but it almost feels like our voices do not matter. We believe that expansion will be the biggest problem for the town's pollution.

tion Rebellion paraded from London Luton Airport to St George's Square. Photo by Jon Marks

Luton Today | *The Luton News*
Herald & Post

Extinction Rebellion paraded from London Luton Airport to St George's Square. Photo by Jon Marks | other

"We are not going to give up and we will keep putting our message out there, most of the town is supporting us and we have not done anything in Luton to disrupt the public, we just want to get our message across."

Luton Council has declared a climate emergency and set up a cross party working group which is working on an action plan at pace to support the drive for Luton to reach net zero carbon by 2040.

The council's action plan to reduce carbon emissions across the town includes encouraging more walking and cycling, the use of public transport and electric vehicles, developing proposals to improve air quality and investment in new heating system and additional insulation in properties.

Robin Porter, chief executive of Luton Council, said: "We would like to thank the organisers of Saturday's demonstration who worked with the police, council and other partners to ensure people were able to exercise their right to peaceful protest.

Extinction Rebellion paraded from London Luton Airport to St George's Square. Photo by Jon Marks

Luton Today | *The Luton News*
Herald & Post

Extinction Rebellion paraded from London Luton Airport to St George's Square. Photo by Jon Marks | other

n Airport is absolutely vital to the region and future growth will bring economic and growth which is desperately needed to tackle poverty which is far too prevalent in our

"At the same time we do absolutely understand and share the concerns around the environment so the right balance must be found.

"Our airport company, London Luton Airport Ltd (LLAL), consulted in the autumn on long-term sustainable growth of the airport.

"As part of this they outlined a number of measures for actively managing future environmental impacts, including carbon-neutral infrastructure for the second terminal, ground fleets switching to zero or low-carbon and the provision of clean electric standing power to aircraft.

 Extinction Rebellion paraded from London Luton Airport to St George's Square

Luton Today | The Luton News
Herald & Post

Extinction Rebellion paraded from London Luton Airport to St George's Square | other

"There was a lot of support for the proposals due to the life-changing benefits it would bring to people, but also a very clear message that climate change is still a major concern.

"Updated proposals will therefore be the greenest, most environmentally responsible that they possibly can be. We want LTN to be the greenest and most socially conscious airport and will do whatever we can to make this happen.

"LLAL's £225m investment in the Luton DART fast transit, which is due to open in 2021, underlines this commitment with a target of 45 per cent of all passengers using public transport to get to the airport.

"LLAL will also be taking a lead on working with the airport's operator to consider other measures that could further improve the airport's existing environmental footprint."

Bedfordshire Police had a total of 40 officers helping to facilitate the demonstration at London Luton Airport and in the town centre, one arrest was made.

A spokesman for the force said: "This included a mix of existing airport policing officers already deployed for the day, as well as protest liaison officers and community officers.

"We also had seven volunteer special constables on duty to support the operation.

"One person was arrested for breaching a bye-law but the event passed safely without incident."

Extinction Rebellion stage protest at Luton Airport - demanding end to expansion plans

Extinction Rebellion (XR) targeted Luton Airport over the weekend to protest against its plans for expansion.

On Saturday, the environmental protest movement unveiled banners within the terminal, and then occupied a roundabout on the entrance road to the airport.

The protest included activists from Luton, alongside other members of XR from across the region.

Although recently revised with a focus on "sustainability", London [Luton Airport](#) Limited's (LLAL) current proposal call for a doubling in passenger numbers, from 16 to 32 million passengers a year.



Protesters against the airport expansion

While plans have been postponed because of [Covid-19](#) and its effect on the aviation industry, XR insist that they should be scrapped altogether. Flying is recognised as a large contributor to climate change.

“Floods in [India](#), fires in California, Louisiana counting the cost of storm Laura - and Luton Airport is expanding” says activist Jeremy Williams.

“Expanding the airport is utterly irresponsible at a time of climate emergency.

“We understand that the airport supports council spending, and how important that has been during a decade of Tory austerity.



Protesters were out in force

“But we cannot continue to grow and depend on that income at the expense of future generations, of the world’s most vulnerable people, and of those who suffer today from the noise and pollution from the airport.”

Protests were held at other airports across the country on Saturday, including Gatwick, Stansted and Bristol. XR will turn their attention to London and Parliament from Tuesday, September 1.

Luton Airport expansion protesters interrupt meeting to slam approved plans as 'disgrace'

One shouted the proposals to expand the airport would make the 'most polluted town in the country' even worse



A Ryanair plane at Luton Airport (Image: Kirsty Wigglesworth/PA)

Boisterous environmental campaigners angrily interrupted a local authority meeting which backed passenger expansion plans for London [Luton Airport](#).

Two protesters loudly voiced their opinions on an application by London Luton Airport Operations Limited (LLAOL) to accommodate 19 million passengers annually.

One called out during a Luton Borough Council development management committee meeting: "What about the environment? Come on. This is a disgrace. Cancel the expansion."

READ NEXT - [Airport expansion plan approved - the details](#)

"What about the planet?" he asked. "Does nobody care? The most polluted town in the country and you want to pollute it more. Great. Thank you."

The pair left the council chamber after their vociferous messages to councillors, council officers and consultants, as well as the contingent from LLAOL.

Earlier they displayed a banner saying Cancel Luton Airport Expansion in the public gallery.

Immediately before the uproar, Luton Mayor and Labour Farley councillor Mahmood Hussain indicated he would ask for a condition on investment in the environment to be included, in light of

the strength of feeling described in more measured tones over the two evenings which the committee sat.

“How supportive are you to those areas of the town immediately under the flightpath?” he asked.



Luton Airport (Image: Luton Airport)

The airport’s director of corporate affairs Oliver Jaycock replied: “We’re incredibly committed. We’re local residents and employees.

“We’ve a dedicated community trust fund which we target on specific areas, such as yours.

“My only advice would be to have that conversation. Let’s find ways where we can work better together.”

A previous planning permission granted in June 2014 was subject to a number of conditions, including a passenger cap limiting the total number to 18 million passengers per annum.

LLAOL requested to vary conditions on passenger capacity, noise contours, parking management and a travel plan from a 2017 application.

Labour South councillor David Agbley referred to the objectors’ comments that the airport “has been ignoring its noise management plan, its noise mitigation and its noise insulation scheme”.

“Why should we believe this time you’re not going to do the same?” he asked. “The question everyone wants to know is ‘Do you see yourselves above the law or do you abide by the law’?”

The airport’s head of communications Neil Bradford replied: “Of the 28 planning conditions attached to our original permission we’ve remained compliant with all but one of those, that’s condition ten about noise.

“As soon as it became apparent that was the case we’ve ensured we followed due process.

“We’ve been open and transparent with our communities and with the local authority about the steps we’ve taken to address this.

“Regrettably those steps didn’t produce the contour sizes we expected, but throughout we’ve acted in accordance with the planning rules, we’ve acted responsibly and been open and transparent.”

Labour Farley councillor Dave Taylor, who chairs the committee, said: “It’s good that democracy does work and exists in Luton.

“I’ve certainly read all the objections. The reality is climate change is prominent in everyone’s lives. There’s an impact. There’s no doubt about it.

“I’m not a climate change denier. But it has to be done progressively. We can only determine this on planning grounds, not emotional ones.

“The airport can still operate up to 18 million passengers on the old permission. I’m convinced now more than ever the economic benefits outweigh the environmental impact.”

Get the latest Luton news direct into your inbox

Want the latest news, features and reviews direct into your inbox without the need to even open your browser?

Well now you can with our new LutonLive newsletter. Sign up and we'll send a round-up email a few times every week, as well as updating you on breaking news as it happens.

We choose the most important stories of the day to include in the newsletter, including crime, court news, long reads, traffic and travel, food and drink articles and more.

Signing up to the newsletter is simple. **All you have to do is to [click here](#), select Luton Live and type in your email address.**

Reassurances from airport representatives that they would discuss local environmental improvements, such as tree planting, outside of the planning process persuaded councillor Hussain not to demand a condition be included.

Councillors voted seven in favour and two against to allow the increase in passenger numbers and amendments to the noise contours.

Remember you can catch up with what's going on in Bedfordshire on our [homepage](#).

[Sign up for our newsletters](#) so you don't miss the stories you care about.

[Contact us](#) with your news stories, pictures and information, or comment below with your opinions.

Visit [In Your Area](#) for the latest news and events tailored to the postcode where you live.

'Don't back Luton airport expansion' protesters tell festival goers attending Big Weekend

Environmental activists staged a protest during Radio 1's Big Weekend, urging festival goers not to back the expansion proposed for Luton airport.

In February 2023, Luton Borough Council's airport company, trading as Luton Rising, submitted its DCO plans to increase passenger capacity from 18 million to 32 million per annum.

Luton Green Party, Stay Grounded and Luton Friends of the Earth were part of the protest outside of Luton's main train station and in the town centre during the festival.

Mike Oliver, from Luton Green Party, said: "Most people in Luton do not have a clue about airport expansion."



Protester with sign outside Luton train station during the Big Weekend festival.

"Expanding the airport could be a disaster, costing council tax payers a fortune for many years to come. And, of course, there will be twice as much noise, much more traffic and air pollution. So about 10 different groups decided independently to tell people the facts this weekend.

He added: "Expanding the airport is bad for Luton, Britain and the planet."

London [Luton Airport](#) Operations Ltd (LLAOL) and LLAL (Luton Rising) are unconnected companies. Luton Rising is owned by Luton Borough Council (LBC) and is the freeholder of the airport site. LLAO is a separate private company which is not owned, controlled or funded by LBC or Luton Rising. LLAO was granted a concession by LBC and LR to operate the airport, which runs until 2032.

Nick Platts, managing director of Luton Rising, the Luton Council company that owns the airport, said: "We are confident that the people of Luton are aware of, and significantly understand, the benefits of our proposals and the issues involved.

"There have been three extensive public consultations. More than 10,000 people have signed a community-led petition, and 140 businesses have backed an open letter, in support of our proposals. This is set against a small number of protesters in the town centre at the weekend.

"Our application has been examined in detail and has now been sent to the Government for a decision. This is expected later in the year and we look forward to a positive outcome."

"Our proposals for the long-term and sustainable growth of our airport are vital to the future prosperity and wellbeing of our town and its communities, and the economic, employment and social impact benefits would stretch well beyond Luton.

Nick said that Luton Rising has "sought to put environmental considerations at the forefront of our proposals". He explained: "The result has been the submission of a unique and, we believe, industry-leading Green Controlled Growth framework, that for the first time in the UK would restrict expansion if environmental limits that will be independently monitored cannot be adhered to.

"Our ownership of the airport has led to half a billion pounds being invested in Luton's public services and its voluntary and community sector over the last 25 years. That continues at the rate of some £40m a year, including £7m annual support for the voluntary and community sector that supports the lives of the most vulnerable people in Luton who most need our help. This amount would grow substantially as a result of our proposed growth.

But Mike said: "Estimated to cost £2.6 billion, it will almost certainly cost several times that. The airport [Luton Rising] has made a loss of £550 million in the last three years. Luton Council has

lent the airport over half a billion pounds (as of February 2023).”

Nick disputed this and added: “The council’s lending to Luton Rising is less than half the value of all our assets, and it means that interest payments return to the Council rather than to a private investor. This is a benefit, not a cost to the council tax payer. The reported “loss” is not an operating loss, instead it mostly relates to the impact of Covid on airport operations.”

**IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
B E T W E E N**

- (1) LEEDS BRADFORD AIRPORT LIMITED**
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED**
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED**
- (4) NIAL SERVICES LIMITED**

Claimants

-and-

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)**
- (2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)**
- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)**

Defendants

FIRST WITNESS STATEMENT OF

NICHOLAS JONES

I, Nicholas Jones, of Newcastle International Airport Limited, Woolsington, Newcastle upon Tyne, NE13 8BZ, WILL SAY AS FOLLOWS –

- 1. I am employed by the Third Claimant, Newcastle International Airport Limited, as the Chief Executive Officer. The Third Claimant operates Newcastle International Airport,

Woolsington, Newcastle upon Tyne NE13 8BZ, serving circa 5 million customers a year and flying to over 80 destinations.

2. I am responsible for devising and delivering the strategy for Third Claimant and for its performance against that strategy, and for matters of security and safety.
3. I have read a copy of the witness statements of:-
 - 3.1 Alexander Wright;
 - 3.2 Vincent John Hodder; and
 - 3.3 Alberto Martin.
- 3.4 Unless otherwise specified, I have adopted in this statement the definitions used in the witness statement of Mr Hodder.
4. I make this witness statement in support of the application for injunctions at Leeds Bradford Airport, London Luton Airport and Newcastle International Airport made jointly by the Third Claimant and:
 - 4.1 the First Claimant which operates Leeds Bradford Airport;
 - 4.2 the Second Claimant which operates London Luton Airport.
- 4.3 The Third Claimant and the Fourth Claimant seek an injunction in respect of Newcastle International Airport, shown edged red on Plan 3 attached to the Claim Form.
5. The facts and matters set out by me in this witness statement are either known by me directly and are true, or are known by me indirectly and are believed to the best of my knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief. This statement was prepared through email correspondence and discussions with the Claimants' legal representatives. I am duly authorised by the Third Claimant and Fourth Claimant to make this statement.
6. There is exhibited to this statement a bundle of documents marked **NJ1**.
7. I confirm the witness statement of Mr Hodder to be true and accurate in so far as it relates to matters relating to the Third Claimant and Newcastle International Airport, historic direct action at various airports and the imminent threat of direct action by Just Stop Oil ("JSO"), Extinction Rebellion ("XR") and other environmental activist groups.
8. Many of the matters referred to in the witness statement of Mr Hodder apply to the Third Claimant and Newcastle International Airport. To avoid duplication of such matters, I do not repeat these matters in my statement but rather refer to them as applicable and identify and describe the extent of any differences between Leeds Bradford Airport and Newcastle International Airport.
9. For ease, I adopt a similar structure in this witness statement to that adopted in the witness statement of Mr Hodder.

10. I should say at the outset that the Third Claimant is not trying to prohibit or restrain peaceful and lawful protest, and accept that this is a fundamental and important human right. The Claimant seeks only to restrain protest activity that goes beyond that which is peaceful and lawful.

SECTION 1: NEWCASTLE INTERNATIONAL AIRPORT – BUSINESS OVERVIEW

11. Newcastle International Airport is the North East of England's largest airport. Circa 5 million passengers pass through Newcastle International Airport every year to reach a wide range of domestic and international destinations. We directly facilitate 16 commercial airlines to serve the leisure and business market, and operate a "fixed base" operation for private jets called the Samson Executive Jet Centre ('**Samson**').
12. During June, July and August 2024, we expect to service between 15,000 and 21,000 travelling passengers each day.
13. Approximately 500 members of staff are employed directly by the Third Claimant. A further circa 2,500 members of staff are employed across the airport including by our business partners.
14. Newcastle International Airport and its facilities operate 24 hours per day. The airport is incredibly busy, particularly at the start of the day, and there is always a constant stream of people accessing the airport, such that free access to the airport is required at all times to ensure that operations at the airport can run, and that the surrounding road network remains free-flowing and is not adversely impacted due to restricted access at Newcastle International Airport.
15. Newcastle International Airport has one runway which is used by Samson and our 16 commercial airlines for take-off and landing. If the runway is blocked, the airport cannot operate and flights are diverted, delayed and may be cancelled.

SECTION 2: SAMSON

16. Samson provides private aviation services and facilities, and is located at Newcastle International Airport, at a different location to the main passenger terminal.
17. Circa 3,800 private charters travel to and from Newcastle International Airport per year, making up a significant proportion of the daily movements at the airport.
18. I am including this information relating to Samson as some of the more recent protests by XR and Last Generation (an environmental protest group) have targeted private jets. With Newcastle International Airport having multiple private charters a day, the Third Claimant is concerned this will increase the risk of it being the target of protestor action and, as explained above, any blockage to the runway will disrupt both Samson operations and the operation of Newcastle International Airport generally.

SECTION 3: ACCESS TO NEWCASTLE INTERNATIONAL AIRPORT

19. The nature of Newcastle International Airport is such that members of the general public have a licence to enter for the purposes of air travel or directly related purposes (such as dropping-off and picking-up those who are travelling). Individuals do not generally have a licence to enter for other purposes. They certainly have no licence to enter for the purpose of carrying out a protest or direct action. That much is obvious from the fact that (1) such conduct may actively interfere with (and deliberately so) the primary activity of the airport and (2) the fact that it is prohibited by the Byelaws at Newcastle International Airport (see below).

SECTION 4: STATUTORY OBLIGATIONS ON AIRPORT OPERATORS

20. As is more particularly described in the witness statement of Mr Hodder, the Third Claimant is the person who has the management of the airport, for the purposes of being an "airport operator" under the Airports Act 1986.
21. I confirm that Newcastle International Airport is subject to the regulations detailed in the witness statement of Mr Hodder and that the same apply to it.

SECTION 5: NEWCASTLE INTERNATIONAL AIRPORT BYELAWS

22. The Third Claimant exercised the powers conferred on it by section 63 Airports Act 1986 and made the Newcastle International Airport Byelaws 2021 ("**the Newcastle Airport Byelaws**"). A copy of the Newcastle Airport Byelaws are attached to this statement at the Exhibit marked "**NJ1**". They apply to an area outlined in red on the plan to the byelaws which shows the airport boundary.
23. Everyone who visits Newcastle International Airport (including employees and members of the public) is subject to the Newcastle Airport Byelaws. In headline terms, the Newcastle Airport Byelaws set out acts which are prohibited and others for which permission is required.
24. Para 4.28 of the Newcastle Airport Byelaws provides:

"4.28 Persons required to leave

Remain on the Airport after having been requested by a Constable or an Airport Official to leave, such request arising where that person is causing a disturbance (including using language or making gestures which are lewd, foul or offensive) or has committed or is, in the reasonable opinion of the requesting Constable or Airport Official, about to commit an offence (including a breach of a byelaw). Nothing in this byelaw shall prejudice the operation of other byelaws pertaining to the removal or evacuation or persons from the Airport".

25. Para 4.18 of the Newcastle Airport Byelaws provides:

"4.18 Demonstrations and processions etc

Organise or take part in any demonstration, protest, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the comfort and convenience or safety of passengers or persons using the Airport".

26. Other potentially relevant provisions of the Newcastle Airport Byelaws include the following:
- 26.1 **4.1** – "[no person shall:-] without lawful authority or reasonable cause or excuse, tamper or interfere with any Aircraft or anything used in connection with any Aircraft".
 - 26.2 **4.2** – "[no person shall:-] without lawful authority or reasonable cause or excuse, tamper or interfere with or misuse any equipment or apparatus used for or in connection with the control of access of persons or vehicles to any part of the Airport".
 - 26.3 **4.10** – "[no person shall:-] fail to observe or comply with any notice prohibiting or restricting access to any part of the Airport".
 - 26.4 **4.12** – "[no person shall:-] enter the Airport, except for a bona fide purpose, or remain at the Airport once the aforementioned purpose has been discharged or if asked to leave by a Constable or Airport Official".
 - 26.5 **4.19** – "[no person shall:-] display any flags, banners, notices or emblems likely to cause a breach of the peace to any part of the Airport".
 - 26.6 **4.20** – "[no person shall:-] intentionally obstruct or interfere with the proper use of the Airport or with any persons acting in the execution of their duty in relation to the operation of the Airport".
 - 26.7 **4.25** – "[no person shall:-] loiter or remain on the Airport without reasonable cause 3.26 Obstruction".

SECTION 6: ENFORCEMENT OF THE NEWCASTLE AIRPORT BYELAWS

27. [I am not aware of any instances of the Newcastle Airport Byelaws needing to be enforced in respect of acts of protests at Newcastle International Airport].
28. I am aware that the Public Order Act 2023 has relatively recently come into force and that some of the acts carried out in relation to airport protests might be capable of being prosecuted under that legislation (such as sections 1, 2 and 7).

SECTION 7: THREAT OF DIRECT ACTION

29. The witness statement of Alexander Wright sets out the background to the JSO campaign of direct action targeting airports this summer.
30. Newcastle International Airport agreed in August 2020 to permit a trade union protest by Unite to take place at a designated area outside of the terminal – the protest was aimed against an airline operator and was a peaceful, planned protest subject to the protestors complying with instructions issued by the Third Claimant. However, the Third Claimant has not received any contact from protestors planning or intending to plan a protest at the airport, so it could not agree a similar arrangement (which might not, in any event, be possible). Furthermore, for the reasons explained in this and the accompanying witness evidence, the nature of the protest action anticipated, which has initiated the need for the Claimant to apply for an injunction now, is far from peaceful.

SECTION 8: SECURITY AND HEALTH AND SAFETY

Security – Usual Arrangements at Newcastle International Airport

31. Like Leeds Bradford Airport, Newcastle International Airport has strict security measures in place for all individuals (and vehicles) who seek to access airside. This can cover both passengers who are travelling through Newcastle International Airport to another destination, but also staff who work airside, and vehicles which are needed to operate or provide a service airside. Under the Aviation Security Act 1982 no one is permitted to access a security restricted area airside if they do not have the permission of the airport operator (which is conditioned at Newcastle International Airport on each person having undergone and passed these security checks).
32. In addition to the security checks, Newcastle International Airport also has:
 - 32.1 bollards across the access road which leads to the terminal front
 - 32.2 security gates blocking access to the goods yard. All goods going airside are passed through separate security scanners and are collected by staff who are already cleared to be airside; and
 - 32.3 24-hour CCTV in operation across the Airport with vehicle recognition cameras capturing vehicles accessing the car parks.
33. Each passenger must show their boarding pass in order to proceed to the security checks, and each staff member of contractor must have a valid airport ID card. Anyone who has a visitor or temporary pass must be escorted at all times.
34. In 'normal' times, the security arrangements in place at Newcastle International Airport are those set out above. These arrangements apply 24 hours a day.

Security – Enhanced Arrangements at Newcastle International Airport

35. The Third Claimant recognises that it cannot simply expect the Police and the Courts to deal with a protest, and that it too must be proactive in mitigating the apprehended harm.
36. With that in mind, and in preparation and anticipation of the protest, I confirm the Third Claimant has taken equivalent steps to those which the First Claimant has taken at Leeds Bradford Airport (as described in the witness statement of Mr Hodder) to try and mitigate the apprehended harm.
37. In the interests of avoiding duplication, I do not set these out here in full.

Health & Safety

38. My colleagues and I are responsible for the well-being of our staff and passengers who use Newcastle International Airport.
- 38.1 There are a number of features of Newcastle International Airport which make it target for protestors including environmental protestors. These are similar to the features described in the statement of Mr Hodder such as the distance between the main terminal building and the runway is short and there being no physical barriers between the main terminal building and the aircraft stand. With respect to Newcastle International Airport specifically, however I would note that it has three operational airbridges.
39. Mr Hodder describes the health and safety risks associated with a protest at the airport and I can confirm the same risks will apply to Newcastle International Airport.

SECTION 9: OPERATIONAL DISRUPTION AND FINANCIAL/NON-FINANCIAL HARM

40. In addition to health and safety concerns, it is apprehended that a protest at Newcastle International Airport would result in financial and non-financial harm, operational disruption and delay to members of the public.
41. In the event of a protest at Newcastle International Airport, the Third Claimant will suffer similar financial, non-financial and operational harm as those set out in the witness statement of Mr Hodder. In the interests of avoiding duplication, I do not set these out here in full.
42. With respect to Newcastle International Airport specifically, however I would note:-
- 42.1 the Third Claimant forecasts that during July and August 2024 it will process 1.2m passengers. The Third Claimant will still incur its usual costs but will lose revenue;
- 42.2 the Third Claimant may also be subject to customer complaints if customers cannot gain access, and may be required to reimburse customers for their

inability to use pre-booked services such as meet and greet, car parking, Fast Track or Lounge access. The loss to the Third Claimant could be in the region of £300,000 per day from lost passenger income; and

- 42.3 the Third Claimant has service level agreements in place with a number of its airlines, and any delays to departures could result in a 'penalty' charge.
43. If, as a result of JSO's direct action, the airport becomes extremely busy with people waiting in the terminals for delayed flights, the car parks and subsequently the roads around Newcastle International Airport are likely to become congested.
44. I anticipate that the Third Claimant will need to be assisted by a presence from Northumbria Police Force throughout any protests - especially if protestors are gluing themselves to the runway. This will be a drain on police resources and, depending on the scale of the protest and the severity of the activity, could be a significant drain.

SECTION 10: APPREHENSION OF FUTURE PROTESTS AND HARM

45. On the basis of the information that I have outlined above and the matters referred to in the witness statements of Mr Wright and Mr Hodder, the Third Claimant reasonably apprehend that Newcastle International Airport will be a target of unlawful protest activities during the summer of 2024.
46. Further, and in the context set out above, it is reasonably apprehended that the tactics and strategies deployed by the protestors during this apprehended period of protest will mirror those being deployed already by JSO, Last Generation and XR. Those tactics include protestors accessing critical parts of the airport (including airside), trespass, damage to property, and obstructing access to the taxiways and runway.

SECTION 10: THE BALANCE OF CONVENIENCE / COMPELLING JUSTIFICATION

47. The Third Claimant considers that:
- 47.1 unless an injunction is granted, there is a serious risk of disruption at Newcastle International Airport this summer. Based on the action at London Stansted it is very unlikely that JSO will make a public announcement concerning the location, time / date of its protest;
- 47.2 Newcastle International Airport is an obvious target for protestors for the reasons explained above and for similar reasons as those outlined in the witness statement of Mr Hodder;
- 47.3 damages would not be an adequate remedy for the Third Claimant for the reasons set out above and in the witness statement of Mr Hodder;

- 47.4 conversely, since the Order which the Third Claimant seeks is only to prevent unlawful activity, there is no question of anyone in the class of Persons Unknown suffering any actionable loss or needing compensation in damages; and
- 47.5 for the reasons set out in Mr Hodder and Mr Wright's witness statements, the grant of an injunction to restrain disruption would provide an effective deterrent for activists who might otherwise contemplate direct action (given that the breach of such an Order would carry the risk of imprisonment for contempt of court).

SECTION 12: CROSS-UNDERTAKING IN DAMAGES

48. Although I cannot foresee any way in which anyone affected by the injunction could suffer loss or damage, I am authorised on behalf of the Third Claimant to provide the necessary cross-undertaking to pay any sum which the Court considers appropriate to compensate anyone affected by the proposed injunction if it is subsequently determined that the Third Claimant is not entitled to the order which it seeks.
49. The audited accounts for the Third Claimant year ending 31 December 2023 show the following:-

| Revenue for the year ending 31.12.23 | Profit for the year ending 31.12.23 | Balance Sheet as at 31.03.23 |
|--------------------------------------|-------------------------------------|------------------------------|
| £65,643,000 | £21,307,000 | £242,189,000 |

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 behalf of the Third Claimant.


.....
NICHOLAS JONES

Dated this 16th day of July 2024

IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
B E T W E E N

- (1) LEEDS BRADFORD AIRPORT LIMITED
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
- (4) NIAL SERVICES LIMITED

Claimants

-and-

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 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 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 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL 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

NJ1

This is the exhibit marked “NJ1” referred to in the Witness Statement of Nicholas Jones.

**NEWCASTLE INTERNATIONAL
AIRPORT
BYELAWS 2021**

1. INTRODUCTION

2. INTERPRETATION

3. PENALTIES

4. ACTS WHICH ARE PROHIBITED

Tampering with Aircraft
Tampering with equipment regulating access
Parking Aircraft
Security of Aircraft
Emergency stop switches
Interfere with communication and navigation systems
Tampering with communication systems
False warnings and alarms
Smoking
Notices
Direction by Airport Officials etc
Entrance to Airport
Animals
Intoxication
Consumption of alcohol
Control of alcohol
Spitting
Demonstrations and processions etc
Flags, notices and emblems
Obstruction or interference
Misuse of equipment
Refuse etc
Baggage trolleys
Wheelchairs
Loitering
Emergency entrances and exits
Evacuation
Persons required to leave
Persons not to return for 24 hours
Permanent exclusion
Allow anything on Airport where forbidden
Return after request to remove vehicles or Animals
Unattended baggage
Reporting damage to Aircraft
Authorised Taxi Stands
Abandonment of vehicles
Tampering with I.T. equipment and systems

5. ACTS WHICH ARE PROHIBITED WITHOUT CONSENT

Cleaning of Aircraft
Running Aircraft engines
Taking vehicles into hangars
Lighting fires
Refuelling
Annoyance to others
Entering and leaving the Airport
Unauthorised areas
Public Service Vehicles
Airside driving
Walls, fences and barriers
Electronic equipment
Selling
Vehicle for hire
Advertising

Begging
Betting and gaming
Passes and permits
Buildings and other structures
Grazing of Animals
Entering Aircraft without authority
Private Hire Vehicles

6. PROHIBITED ACTS ON PRIVATE AIRPORT ROADS

Conduct while driving
Not to cause danger with vehicle
Designated walkways
Causing obstructions
Parking brake
Use of vehicles
Fuel and exhaust systems
Observe signs
Safety
Driving in designated areas
Driving in Aircraft Manoeuvring Area
Request for removal of vehicle
Leaving vehicles unattended
Driving

7. TAXIS

Airport approved Taxis only
Maximum permitted number of Taxis
Entering buildings
To be available for immediate hire
Disabled Taxis
Cleaning Taxis
Badge
Conduct on Authorised Taxi Stand
Assisting passengers

8. ACCIDENTS

Accident involving vehicles
Accidents involving Aircraft

9. LOST PROPERTY

Application of byelaws
Obligations of finder
Obligations of recipient
Lost property records
Where ownership is ascertainable
Exception to byelaw 9.5
Claims
Disposal of property
Opening packages

10. SEARCH

11. GENERAL

12. REVOCATION OF BYELAWS

1. INTRODUCTION

Newcastle International Airport Limited in exercise of the powers conferred on it by sections 63 and 64 of the Airports Act 1986 hereby makes the following byelaws which shall apply within Newcastle International Airport.

2. INTERPRETATION

Where the following words or phrases appear in these byelaws those words or phrases are to have the following meaning:

"Accident" means an unintended occurrence which has had an adverse physical result;

"Air Traffic Control" means the service provided by air traffic controllers who direct Aircraft on the ground and through controlled airspace and can provide an advisory service to Aircraft in uncontrolled airspace;

"Aircraft" means any power-driven flying machine;

"Aircraft Manoeuvring Area" means that part of the airfield used for the take-off, landing and taxiing of Aircraft;

"the Airport" means the aerodrome known as Newcastle International Airport, shown delineated in red on the plan attached to these byelaws;

"Airport Official" means a person authorised to act by the Company in that capacity;

"Airside" means the area inside the security fence and beyond the Terminal Building security controls;

"Animal" means any animal, wild or domesticated, that is either present within or has been brought into the Airport, except in byelaw 8.1.3. where it has the same meaning as in s170(8) of the Road Traffic Act 1988;

"Authorised Taxi Stand" means that part of the Airport designated for use by an Airport approved Taxi;

"the Company" means Newcastle International Airport Limited and its subsidiary undertakings;

"Constable" means any person having the powers and privileges of a Constable, a traffic police community support officer or a police community support officer;

"Customs and Excise Acts" has the same meaning as in the Customs and Excise Management Act 1979;

"Dangerously" has the same meaning as in the Road Traffic Act 1988;

"Lost Property Office" means any building or part of a building at the Airport which has been designated for that purpose by the Company;

"Passenger Transit System" means the transit system for the movement of people between a car park, the Airport and the Terminal Building;

"Portable Entertainment Equipment" means any mobile device, radio, cassette player, compact DVD or mini disc player, television, computer games console or any other device capable of transmitting audio sounds;

"Prescribed Limit" has the same meaning as in section 11 of the Road Traffic Act 1988;

"Private Hire Vehicle" means a vehicle which is used for the purpose of carrying passengers for hire or reward and which is licensed under the Local Government (Miscellaneous Provisions) Act 1976;

"Public Service Vehicle" means a motor vehicle adapted to carry more than eight passengers and used for carrying passengers for hire or reward;

"Restricted Area" means that part of the Airport lying within the perimeter fence to which access is controlled by security check points and any other authorised entry point and includes all stands, aprons, taxiways and the runway;

"Road Traffic Enactments" has the same meaning as in section 63(3) of the Airports Act 1986;

"Taxi" means a hackney carriage licensed under section 37 of the Town and Police Clauses Act 1847 or a Private Hire Vehicle authorised by the Company to ply for hire at the Airport;

"Terminal Building" means the building or buildings at the Airport used as terminals for passengers arriving at or departing from the Airport;

- 2.1 These byelaws may be cited as the Newcastle International Airport Byelaws 2021.
- 2.2 No provision in these byelaws shall apply to any member of a fire, police or ambulance service when they are acting in the course of duty, or to any emergency vehicle being used by such a person.

3. PENALTIES

- 3.1 Any person contravening any of the following byelaws or anyone assisting or procuring others to do so shall be liable on summary conviction to a fine which, in respect of a contravention of:
 - 3.1.1 byelaws 4.11 and 5.18 shall not exceed the standard scale level 2
 - 3.1.2 byelaws 4.1, 4.2, 4.6, 4.7, 4.8, 4.9, 4.10, 5.1, 5.2, 5.5, 5.8, 5.13, 6.1.1, 6.1.2, 6.1.3, 6.8, 6.9 and 6.13 shall not exceed the standard scale level 4.
 - 3.1.3 Any other byelaws shall not exceed the standard level 3.
- 3.2 As at the date of these byelaws the relevant levels of the standard scale, by virtue of section 122 of the Sentencing Act 2020, are as follows:
 - 3.2.1 Level 2 - £500;
 - 3.2.2 Level 3 - £1,000;
 - 3.2.3 Level 4 - £2,500.

These levels are, however, subject to amendment from time to time by statute or by regulations made under the Sentencing Act 2020.

4. ACTS WHICH ARE PROHIBITED

No person shall:

- 4.1 Tampering with Aircraft

Without lawful authority or reasonable cause or excuse, tamper or interfere with any Aircraft or anything used in connection with any Aircraft.

4.2 Tampering with equipment regulating access

Without lawful authority or reasonable cause or excuse, tamper or interfere with or misuse any equipment or apparatus used for or in connection with the control of access of persons or vehicles to any part of the Airport.

4.3 Parking Aircraft

Except in the case of emergency, place or park an Aircraft other than in the place and position designated for that Aircraft by an Airport Official.

4.4 Security of Aircraft

Fail to secure against movement any stationary Aircraft which is not in a hangar.

4.5 Emergency stop switches

Except in the case of an emergency, intentionally operate any emergency stop switch or other operating control of any escalator, traveller, lift or any other automatic conveyance for the use of passengers upon or near to which a notice is displayed which states that the switch or control is only to be operated in case of emergency.

4.6 Interfere with communication and navigation systems

Operate or use any radio transmitter or other thing capable of emitting electrical interference in such a way as to adversely affect or that is likely to adversely affect the operation of any communications, navigation or other systems at the Airport or in Aircraft present there.

4.7 Tampering with communications systems

Without reasonable excuse, tamper with or misuse any telephone, telecommunications or other apparatus provided for transmitting and receiving messages or data at the Airport.

4.8 False warnings and alarms

Knowingly by any means give a false bomb warning or a false fire, ambulance, or other emergency alarm.

4.9 Smoking

Smoke in, or bring a naked light into, or light any naked flame in:

4.9.1 any place other than a place or places specifically designated by notice for that purpose; or

4.9.2 any place where such an act is prohibited by notice; or

4.9.3 any part of Airside, with the exception of the smoking shelters that are designated by notice.

4.10 Notices

Fail to observe or comply with any notice prohibiting or restricting access to any part of the Airport.

4.11 Direction by Airport Officials etc

Whether on foot or whilst driving neglect, fail or refuse to comply with an indication or direction given by any Airport Official, or Constable or by any notice exhibited by or on behalf of the Company.

4.12 Entrance to Airport

Enter the Airport, except for a bona fide purpose, or remain at the Airport once the aforementioned purpose has been discharged or if asked to leave by a Constable or Airport Official.

4.13 Animals

4.13.1 If in charge of an Animal, fail to keep that Animal under control or permit that Animal to foul any footpath or building, provided that in proceedings for an offence against this byelaw it shall be a defence for the person charged to prove that they took all reasonable precautions and exercised all due diligence to avoid the commission of the offence.

4.13.2 Allow any Animal other than an assistance Animal to enter the Terminal Building, except for the purpose of travel in an appropriate carrier, or in any other situation where the Company has granted permission.

4.14 Intoxication

Be drunk or, without reasonable excuse, under the influence of drugs or other intoxicating substances whilst on the Airport.

4.15 Consumption of alcohol

Consume alcohol or be in possession of any open alcohol container on the Airport, except in bar areas.

4.16 Control of alcohol

4.16.1 Sell or attempt to sell alcohol to a person who is drunk.

4.16.2 Allow alcohol to be sold to a person who is drunk.

4.16.3 Knowingly obtain or attempt to obtain alcohol for consumption by a person who is drunk.

4.17 Spitting

Spit on the floor, side or wall of any vehicle, Passenger Transit System, or in any building, or on any pavement within the Airport or dispose of chewing gum other than in a suitable waste bin.

4.18 Demonstrations and processions etc

Organise or take part in any demonstration, protest, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the comfort and convenience or safety of passengers or persons using the Airport.

4.19 Flags, notices and emblems

Display any flags, banners, notices or emblems likely to cause a breach of the peace on any part of the Airport.

4.20 Obstruction or interference

Intentionally obstruct or interfere with the proper use of the Airport or with any person acting in the execution of their duty in relation to the operation of the Airport.

4.21 Misuse of equipment

Interfere with, touch, operate or in any way use any fixed or mobile equipment or plant or any other machinery or fittings, unless authorised to do so by the Company.

4.22 Refuse etc

- 4.22.1 Leave uncovered refuse containers on any part of the Airport;
- 4.22.2 Drop, leave, throw or otherwise deposit anything where doing so would or might cause or contribute to or lead to damage to property (including Aircraft) or to the defacement by litter, pollution or waste substances of any part of the Airport;
- 4.22.3 Drop, leave, throw or otherwise deposit food waste that might become a bird attractant on any part of the Airport; or
- 4.22.4 Drop or leave litter or refuse on the Airport except in a receptacle provided for the purpose.

4.23 Baggage trolleys

Remove from the Airport or misuse any baggage trolley provided for passenger use by the Company.

4.24 Wheelchairs

Remove from the Airport any wheelchair provided for passenger use by the Company.

4.25 Loitering

Loiter or remain on the Airport without reasonable cause.

4.26 Emergency entrances and exits

Obstruct, tamper with or otherwise interfere with any of the emergency entrances or exits at the Airport.

4.27 Evacuation

Without reasonable excuse, in an emergency:

- 4.27.1 remain in or fail to evacuate any building or place on the Airport when instructed to do so by a Constable, a member of the fire service or an Airport Official; or
- 4.27.2 fail to evacuate any building or place on the Airport upon hearing an alarm requiring persons to evacuate the Airport or that building or place on the Airport.

4.28 Persons required to leave

Remain on the Airport after having been requested by a Constable or an Airport Official to leave, such request arising where that person is causing a disturbance (including using language or making gestures which are lewd, foul or offensive) or has committed or is, in the reasonable opinion of the requesting Constable or Airport Official, about to commit an offence (including a breach of a byelaw). Nothing in this byelaw shall prejudice the operation of other byelaws pertaining to the removal or evacuation of persons from the Airport.

4.29 Persons not to return for 24 hours

Having left the Airport upon the instruction of a Constable or Airport Official, return to or re-enter the Airport within the subsequent twenty four hour period, unless re-entry is authorised in writing by the Constable or Airport Official issuing the original request to leave (or in their absence, the Company).

4.30 Permanent exclusion

Enter the Airport whilst being permanently prohibited from doing so, having been:

- 4.30.1 convicted of an offence in relation to these byelaws, or of any other offence committed on Airport premises or involving the Airport's activities or operations, or
- 4.30.2 issued with a caution by the police in respect of such an offence,
- and in either case a notice will be given by the Company to that person setting out the exclusion.
- 4.31 Allow anything on Airport where forbidden
- Allow any vehicle, Animal or thing to be on the Airport after its presence on the Airport has been forbidden by a Constable or an Airport Official having reasonable grounds to believe that its presence has been responsible for or is about to be responsible for a criminal offence or breach of any byelaw.
- 4.32 Return after request to remove vehicles or Animals
- Having removed any vehicle, Animal or other thing at the request of a Constable or Airport Official, allow that vehicle, Animal or other thing to re-enter the Airport within the period of twenty four hours thereafter or without complying with any conditions of re-entry stipulated by a Constable or Airport Official.
- 4.33 Unattended baggage
- Leave any baggage or other item unattended anywhere within the Airport.
- 4.34 Reporting damage to Aircraft
- Without reasonable excuse fail to report damage howsoever caused to an Aircraft to its owner or a person in charge of it or an Airport Official.
- 4.35 Authorised Taxi Stands
- Cause or permit any vehicle other than an Airport approved Taxi to stand on an Authorised Taxi Stand.
- 4.36 Abandonment of vehicles
- Abandon any vehicle on any part of the Airport to which the Road Traffic Enactments do not apply. A vehicle will be deemed to be abandoned if:
- 4.36.1 It is found on site without a valid entry ticket and without a pre-booked parking arrangement and it has remained static for more than 30 days; or
- 4.36.2 Enquiries are conducted with the Police and the registered keeper/owner and/or registered address cannot be established; or
- 4.36.3 Enquiries are conducted with the Police and it is found that the vehicle is fitted with false registration plates; or
- 4.36.4 Enquiries are conducted with the Police and it is found that the vehicle does not have a valid vehicle registration.
- 4.37 Tampering with I.T. equipment and systems
- Tamper with or misuse any I.T. equipment or systems provided for managing, processing or displaying information at the Airport.