




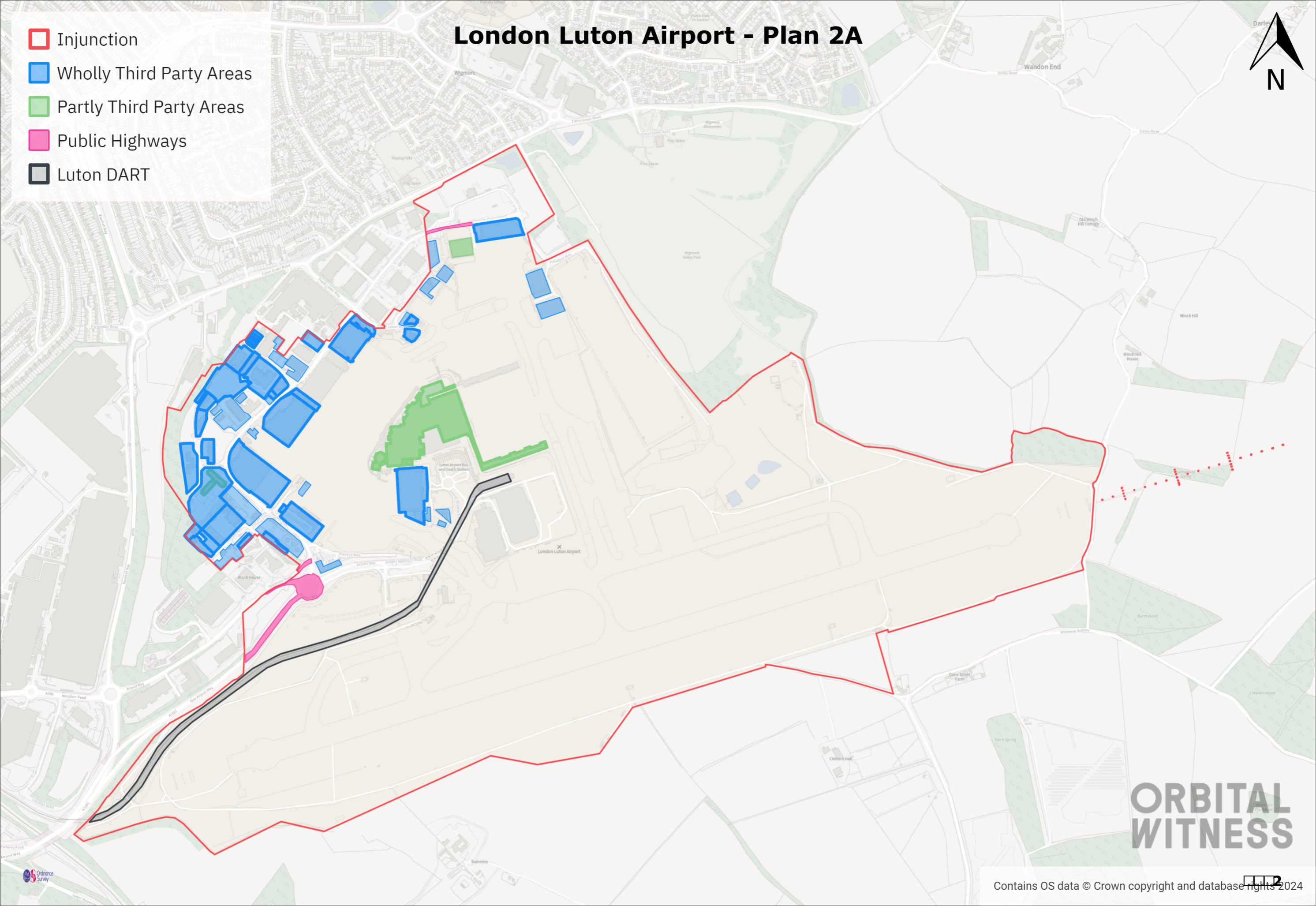







London Luton Airport - Plan 2A

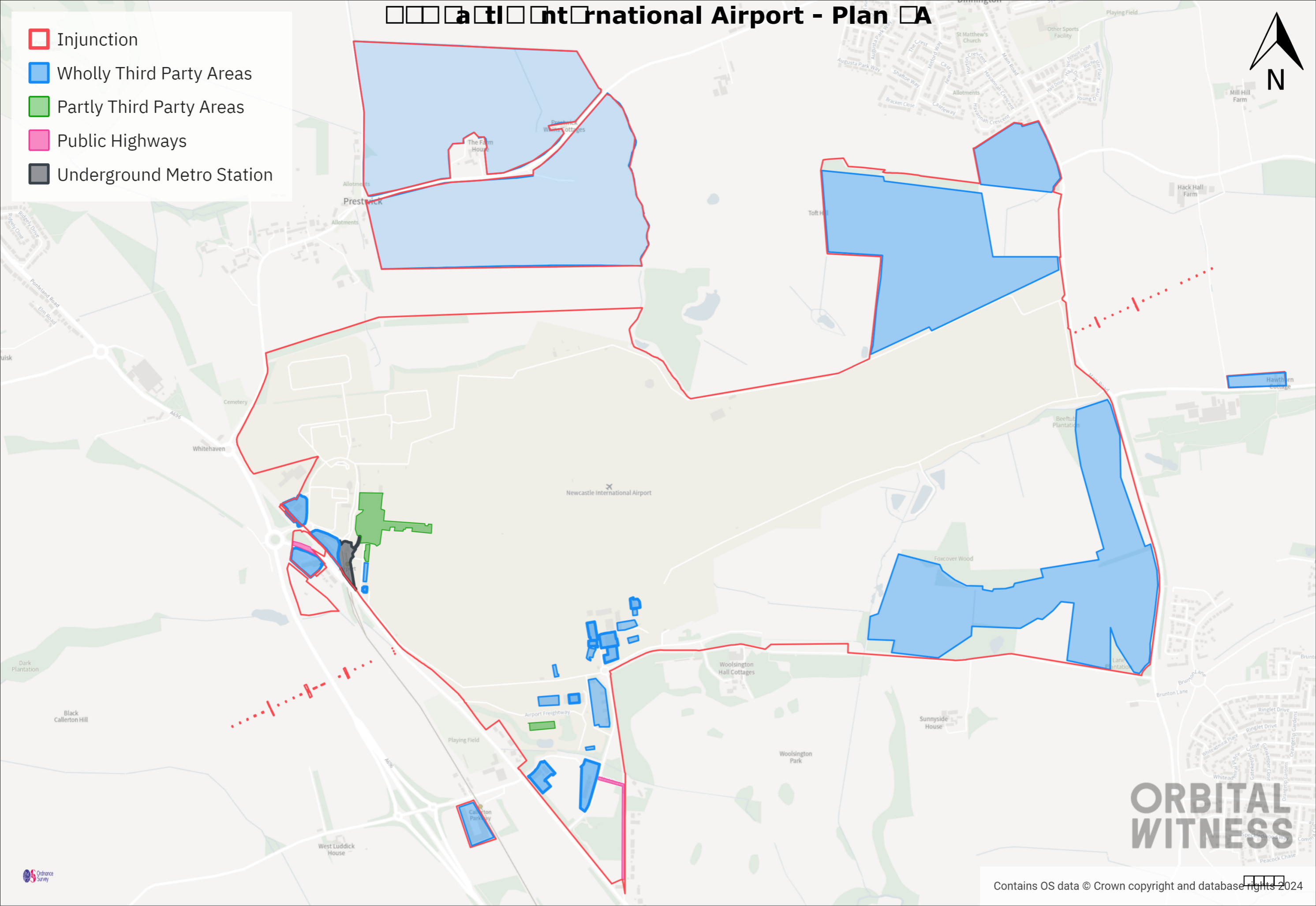
-  Injunction
-  Wholly Third Party Areas
-  Partly Third Party Areas
-  Public Highways
-  Luton DART



**ORBITAL
WITNESS**

Ordnance Survey International Airport - Plan A

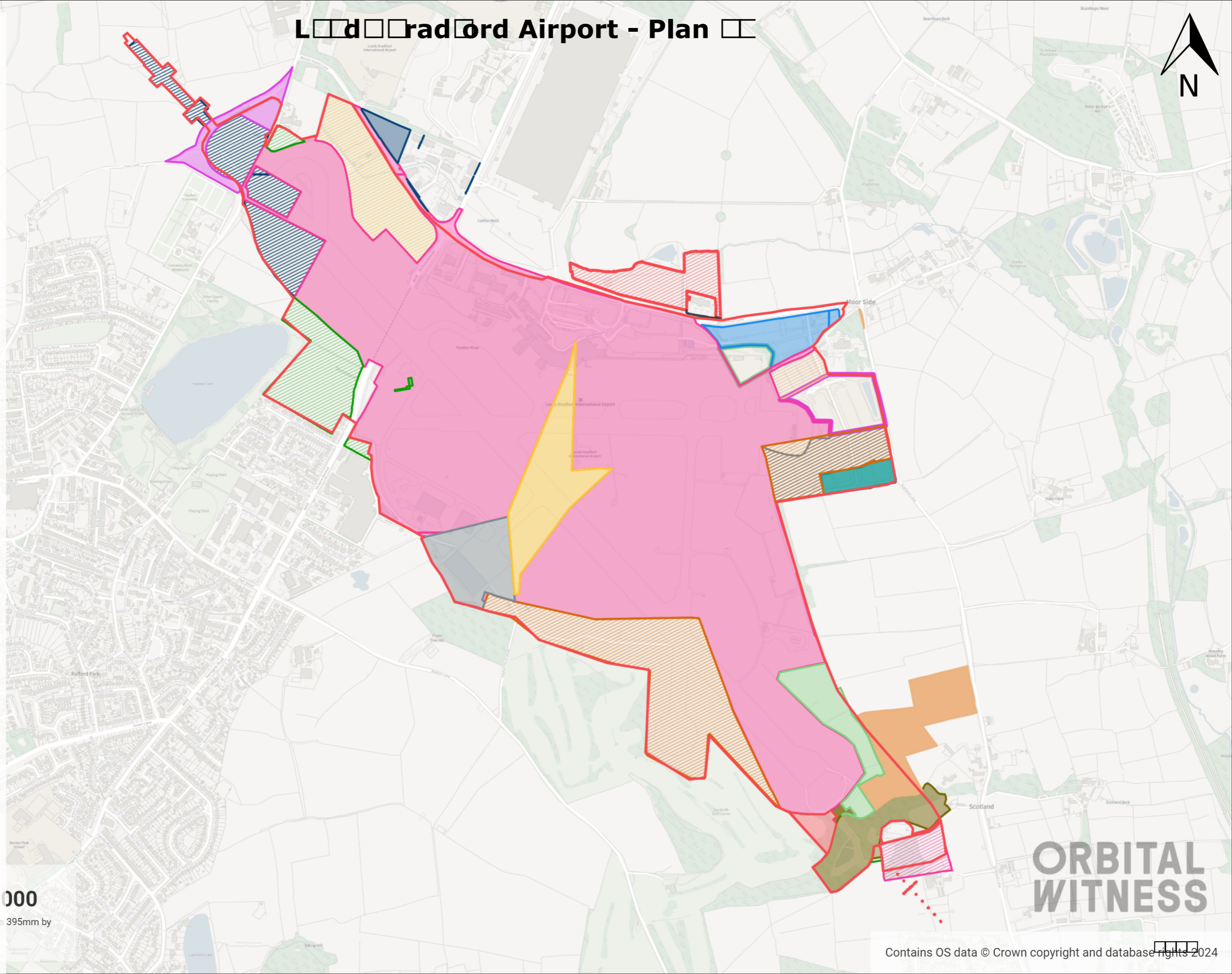
-  Injunction
-  Wholly Third Party Areas
-  Partly Third Party Areas
-  Public Highways
-  Underground Metro Station



Leeds Bradford Airport - Plan



- WYK232726
- WYK269721
- WYK275282
- WYK461796
- WYK500833
- WYK500834
- WYK501284
- WYK512407
- WYK547070
- WYK547071
- WYK570873
- WYK574741
- WYK624715
- WYK657177
- WYK657178
- WYK657180
- WYK698270
- WYK698436
- WYK706576
- WYK775942
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- WYK806314
- WYK831477
- WYK857105
- WYK857106
- WYK395678



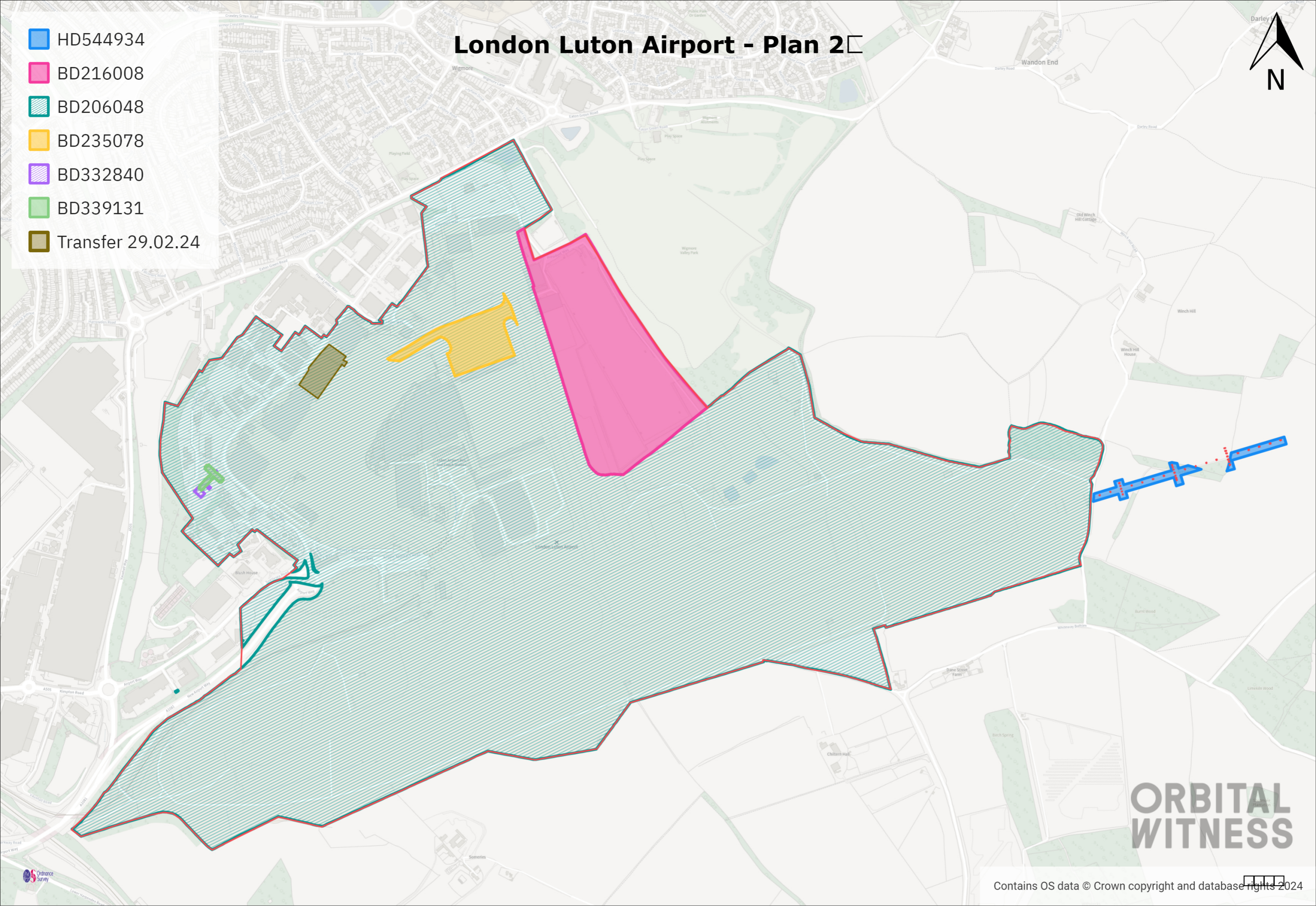
Map scale 1:10,000
Printed map area measures 395mm by 270mm

ORBITAL WITNESS

London Luton Airport - Plan 2



- HD544934
- BD216008
- BD206048
- BD235078
- BD332840
- BD339131
- Transfer 29.02.24

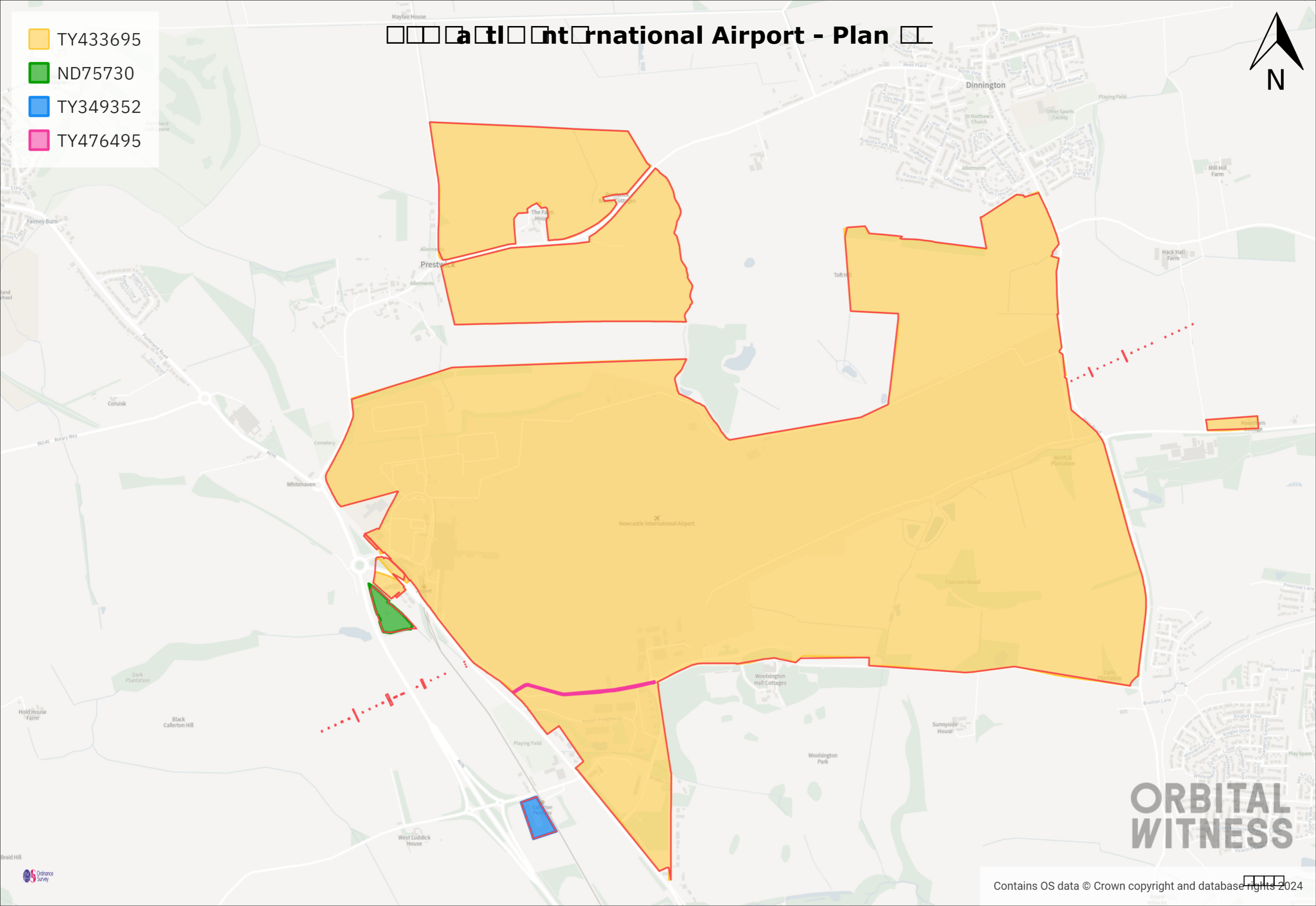


**ORBITAL
WITNESS**



- TY433695
- ND75730
- TY349352
- TY476495

Newcastle International Airport - Plan



ORBITAL
WITNESS

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(1) LEEDS BRADFORD AIRPORT LIMITED

AND THREE OTHERS

- v -

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

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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



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

IMPORTANT NOTICE TO THE DEFENDANTS

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

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 18 July 2024

UPON the Claimants’ claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants’ ex-parte application for an injunction issued on 16 July 2024 (“**the Application**”)

AND UPON READING the Application and the first witness statements: of Alexander James Wright dated 16 July 2024, 17 July 2024, (another) 17 July 2024; and 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 (“**the Witness Statements**”).

AND UPON hearing Mr Morshead K.C. and Miss Barden, Counsel for the Claimants and no one attending for the Defendants.

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

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to protestrequest@lba.co.uk.

DEFINITIONS

“**Leeds Bradford Airport**” means the land shown in red outlined in red on Plan 1 to the Claim Form, appended to this Order in Schedule 1 (“**Plan 1**”).

“**Warning Notice**” means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

<https://www.leedsbradfordairport.co.uk/injunction>. at which copies of this Order may be viewed and downloaded).

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.
2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the First Defendant:
 - a. Uploading a copy onto the following website:
<https://www.leedsbradfordairport.co.uk/injunction>.
 - b. Sending an email to each of the email addresses listed in Schedule 3 to this Order (1) stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and (2) attaching this Order.
 - c. Affixing a notice at those locations marked with an “X” on Plan 1 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form of Schedule 4.
4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraph 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.
6. The Court will provide sealed copies of this Order to the First Claimant’s solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.
8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3 and 4. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the First Defendant of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the First Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.
13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE FIRST CLAIMANT

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

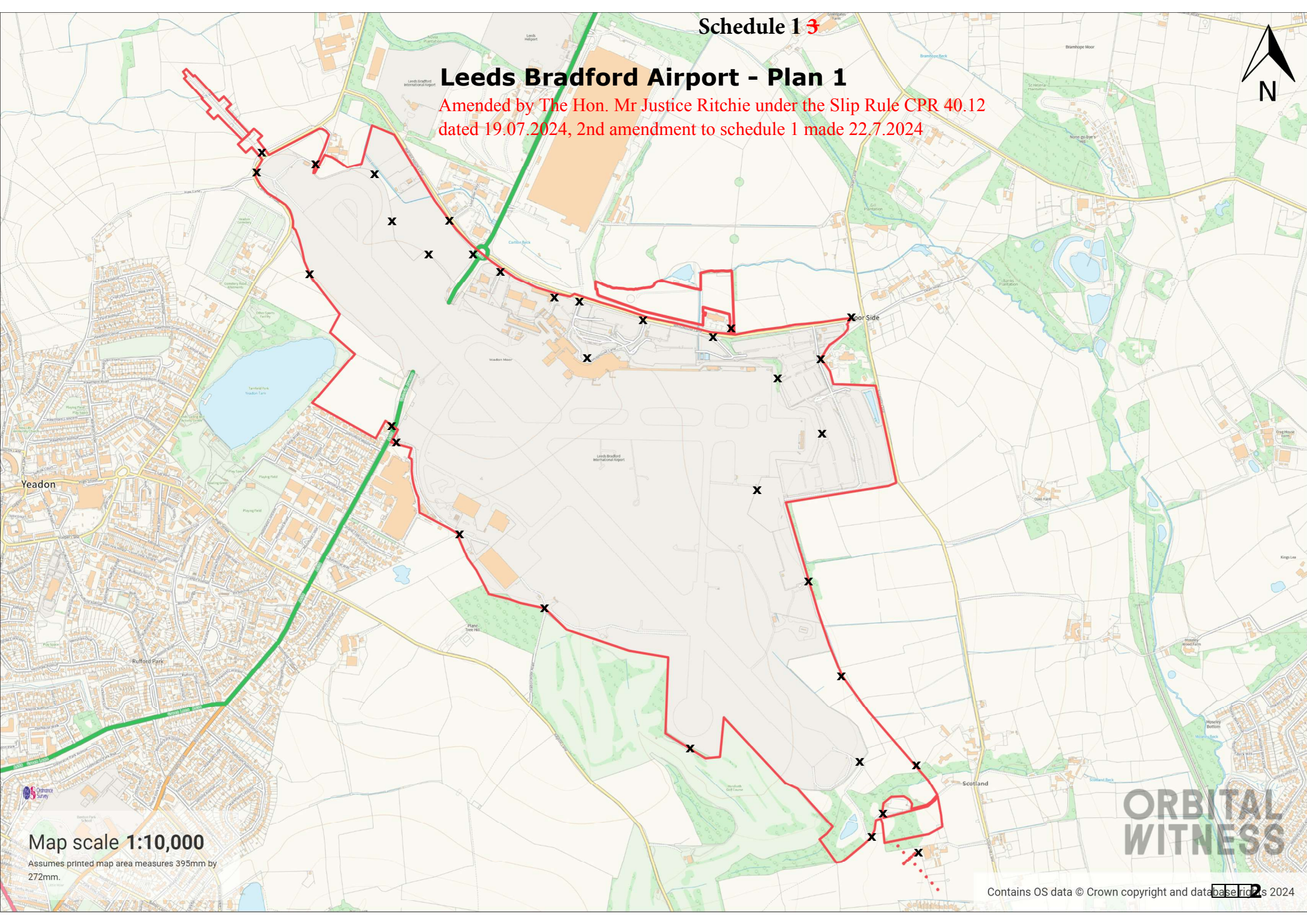
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

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

Leeds Bradford Airport - Plan 1

Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024



Map scale 1:10,000

Assumes printed map area measures 395mm by 272mm.



ORBITAL WITNESS

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

- (1) The First Claimant will take steps to serve the First Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
- (2) The First Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 (“the Order”)

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

FROM: Leeds Bradford Airport Limited (the “**First Claimant**”)

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

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

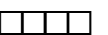
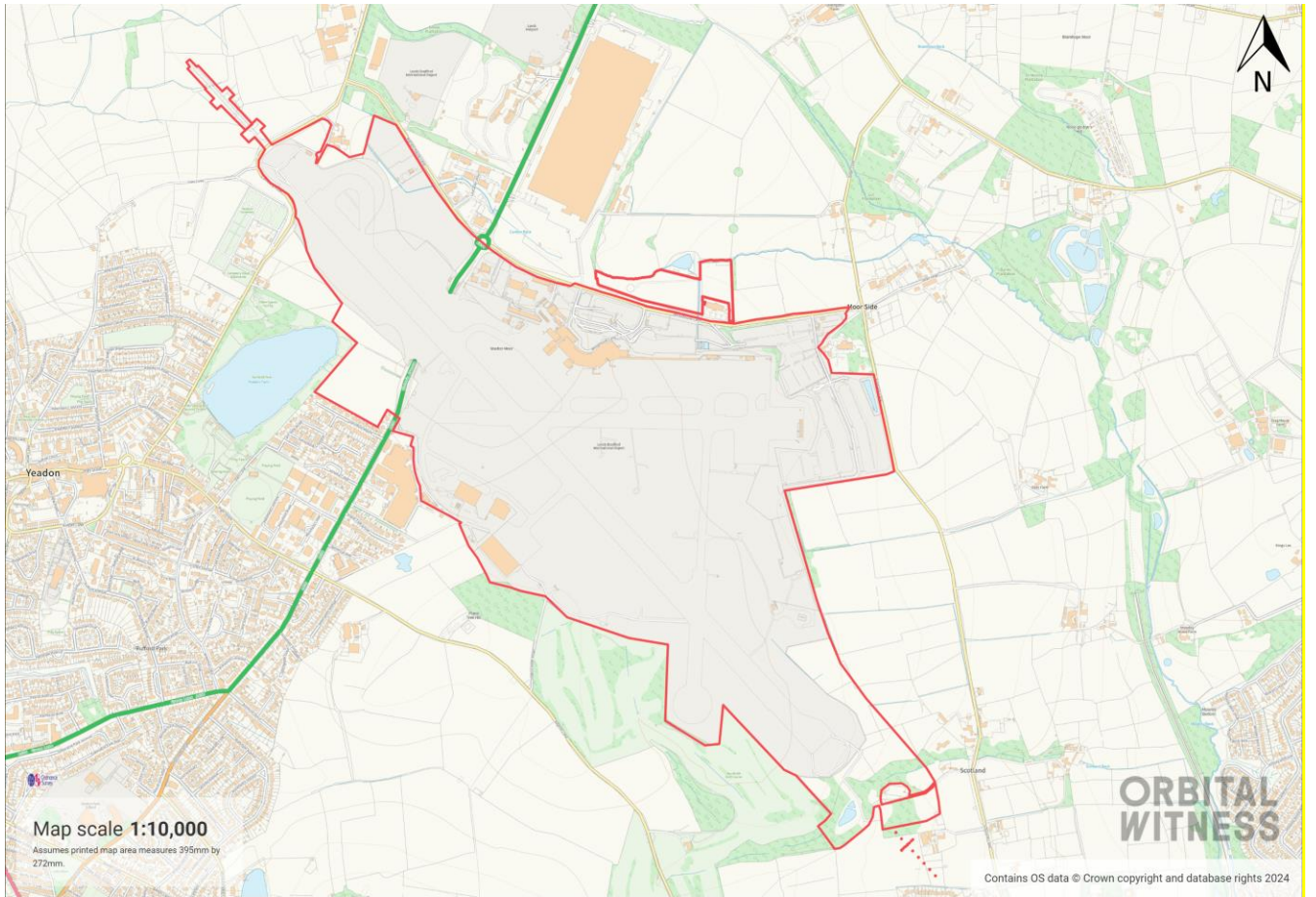
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

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

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

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

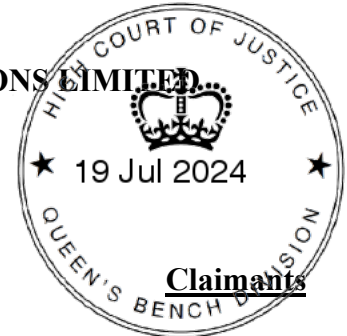


IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

AND THREE OTHERS



- v -

KB-2024-002317

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 19 July 2024.

UPON the Claimants' claim by the Claim Form issued on 16 July 2024.

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, dated 17 July 2024, (and another) 17 July 2024 and dated 18 July 2024; Vincent Hodder dated 15 July 2024; Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants.

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

AND UPON the Second Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London Luton Airport, as defined by this Order, should be made by email to protestrequest@ltn.aero.

DEFINITIONS

"London Luton Airport" means the land shown in red outlined in red on Plan 2 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

"Warning Notice" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address <https://www.london-luton.co.uk/corporate/lla-publications/injunction> at which copies of this Order may be viewed and downloaded.

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of London Luton Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.
2. This Order is subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Second Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the Second Defendant:
 - a. Uploading a copy onto the following website: <https://www.london-luton.co.uk/corporate/lla-publications/injunction>.
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and attaching this Order.
 - c. Affixing a notice at those locations marked with an “X” on Plan 2 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form in Schedule 4.
4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the Second Defendant and each of them.
6. The Court will provide sealed copies of this Order to the Second Claimant’s solicitors for service (whose details are set out below).
7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

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

FURTHER DIRECTIONS

9. Service on the Second Defendant of any further applications or documents in the proceedings by the Second Claimant shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Second Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Second Claimant's solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second Claimant's solicitors.
13. The Second Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE SECOND CLAIMANT

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

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

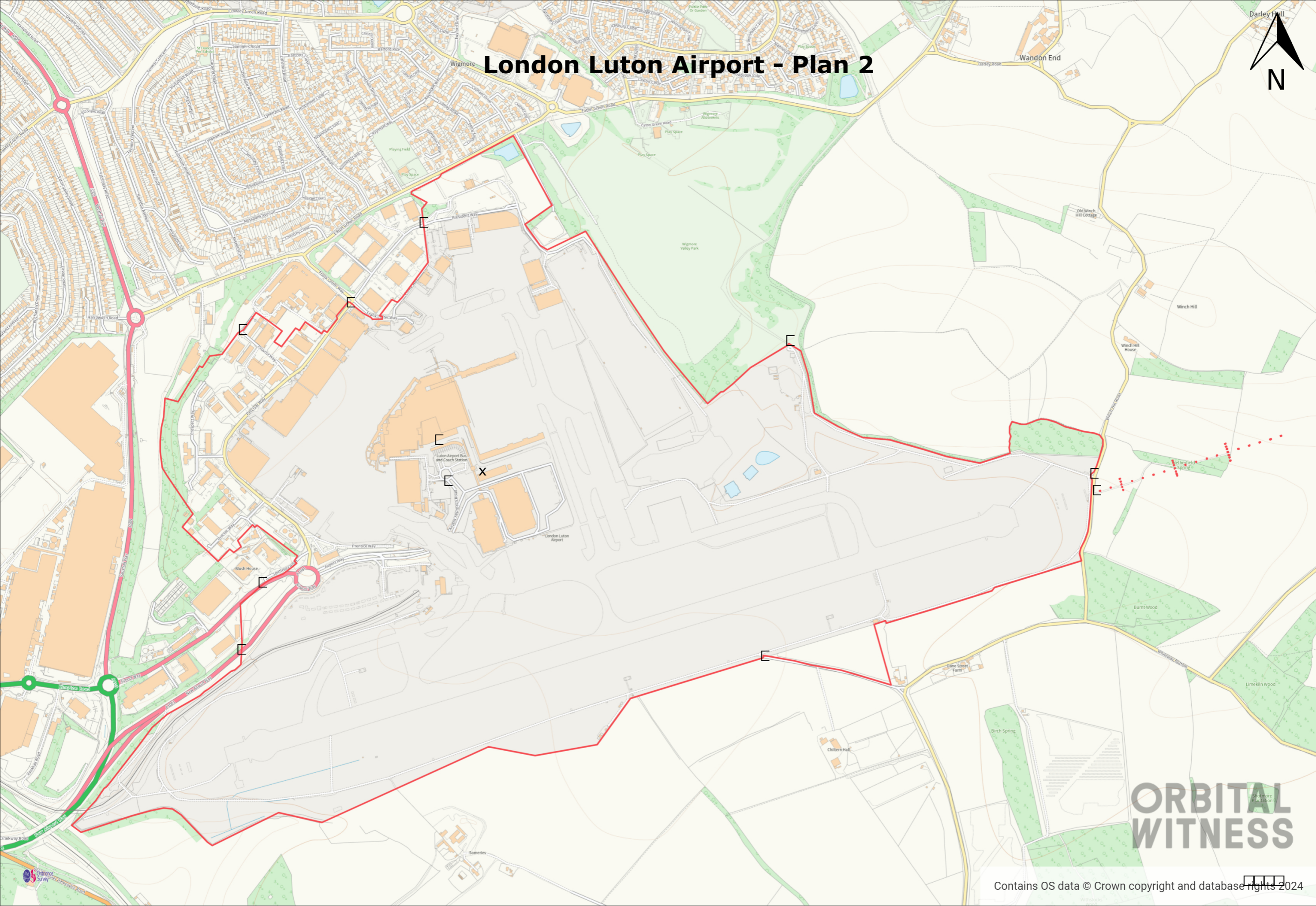
07712 881 393

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

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

SCHEDULE 1

London Luton Airport - Plan 2



**ORBITAL
WITNESS**



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND CLAIMANT

- (1) The Second Claimant will take steps to serve the Second Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
- (2) The Second Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 (“the Order”)

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

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

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

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.

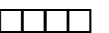
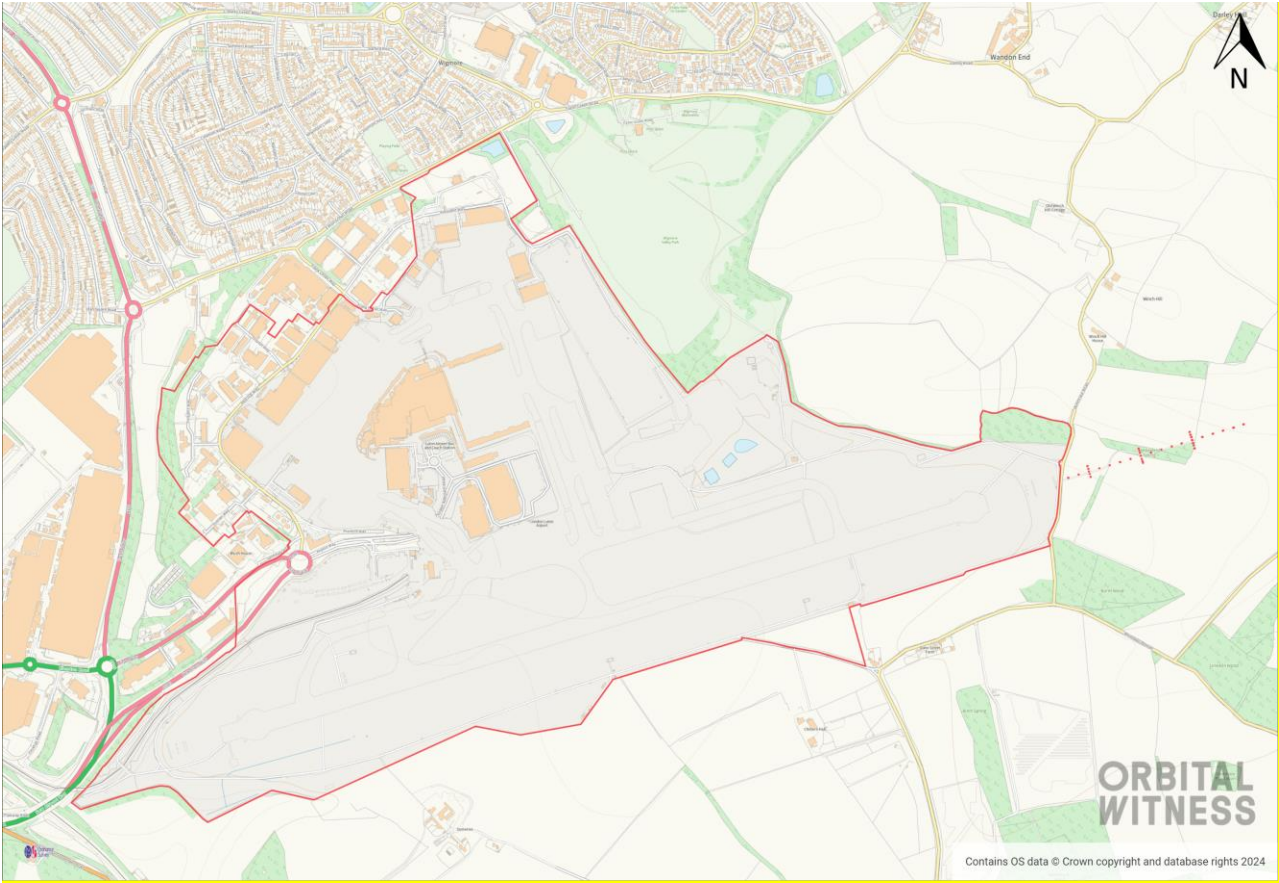
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

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

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

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



IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

AND TWO OTHERS



- v -

KB-2024-002317

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO

BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

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

BEFORE The Honourable Mr Justice Ritchie on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, 17 July 2024, (and another) 17 July 2024, dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants

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

AND UPON the Third and Fourth Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Newcastle International Airport, as defined by this Order, should be made by email to protestrequest@newcastleinternational.co.uk

DEFINITIONS

"Newcastle International Airport" means the land shown in red outlined in red on Plan 3 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

"Warning Notice" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address <https://www.newcastleairport.com/about-your-airport/airport-company/injunction/> at which copies of this Order may be viewed and downloaded).

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Newcastle International Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants (or either of them).
2. This Order is subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Third and Fourth Claimants shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the Third Defendant:
 - a. Uploading a copy onto the following website:
<https://www.newcastleairport.com/about-your-airport/airport-company/injunction/>
 - b. Sending an email with this Order attached to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
 - c. Affixing a notice at those locations marked with an “X” on Plan 3 setting out where these documents can be found and obtained in hard copy in the form of Schedule 4.
4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraph 3 shall be good and sufficient service of this Order and of the Claim Documents upon the Third Defendant and each of them.
6. The Court will provide sealed copies of this Order to the Third and Fourth Claimants’ solicitors for service (whose details are set out below).

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

FURTHER DIRECTIONS

9. Service on the Third Defendant of any further applications or documents in the proceedings by the Third and Fourth Claimants shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Third and Fourth Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Third and Fourth Claimants' solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Third and Fourth Claimants' solicitors.
13. The Third and Fourth Claimants (or either of them) have liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

Ritchie J

Made 19.7.2024

COMMUNICATIONS WITH THE THIRD AND FOURTH CLAIMANTS

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

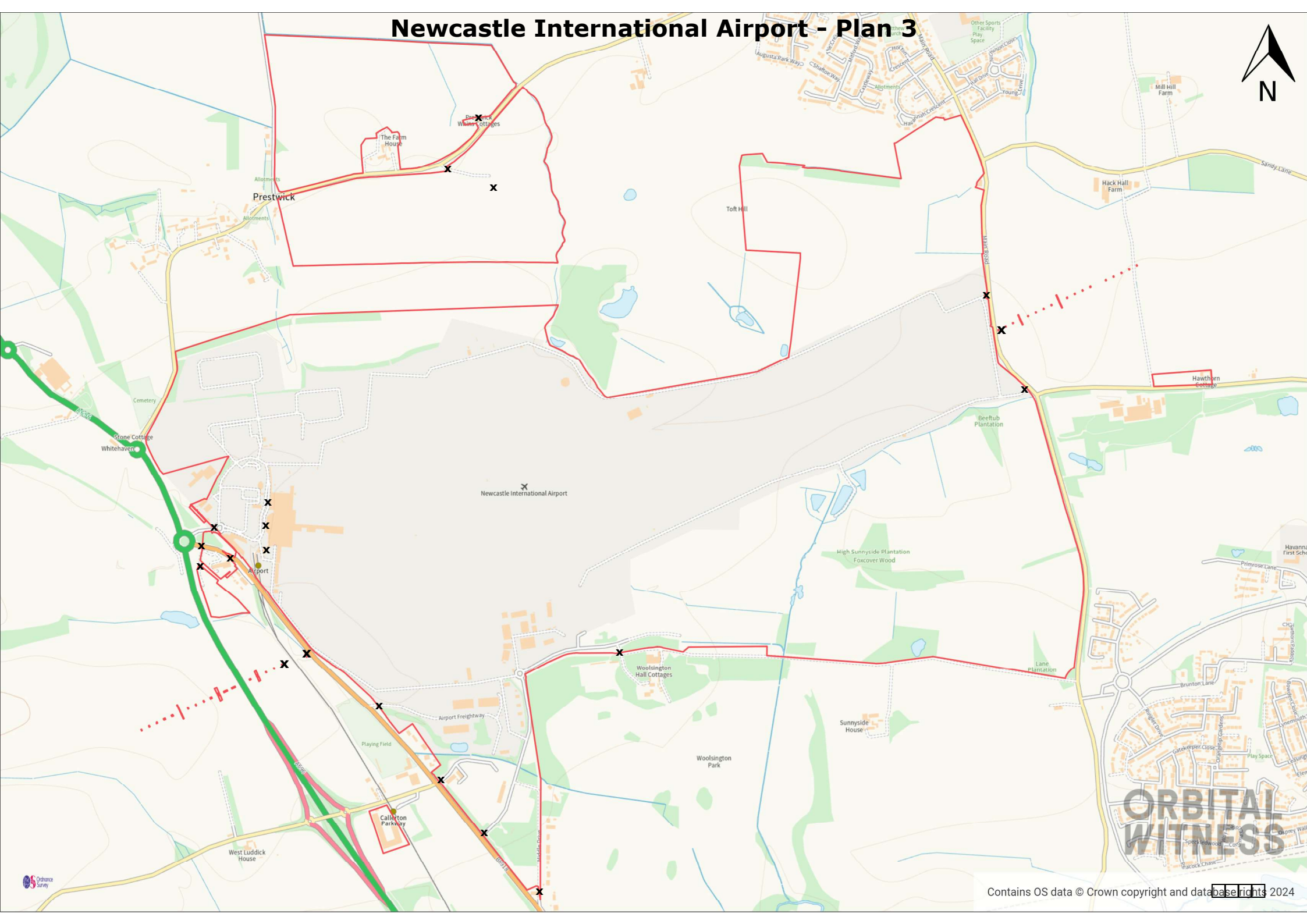
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

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

SCHEDULE 1

Newcastle International Airport - Plan 3



Prestwick

Newcastle International Airport

ORBITAL WITNESS

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE THIRD AND FOURTH CLAIMANTS

- (1) The Third and Fourth Claimants will take steps to serve the Third Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
- (2) The Third and Fourth Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force**NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")**

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

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

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

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants.

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

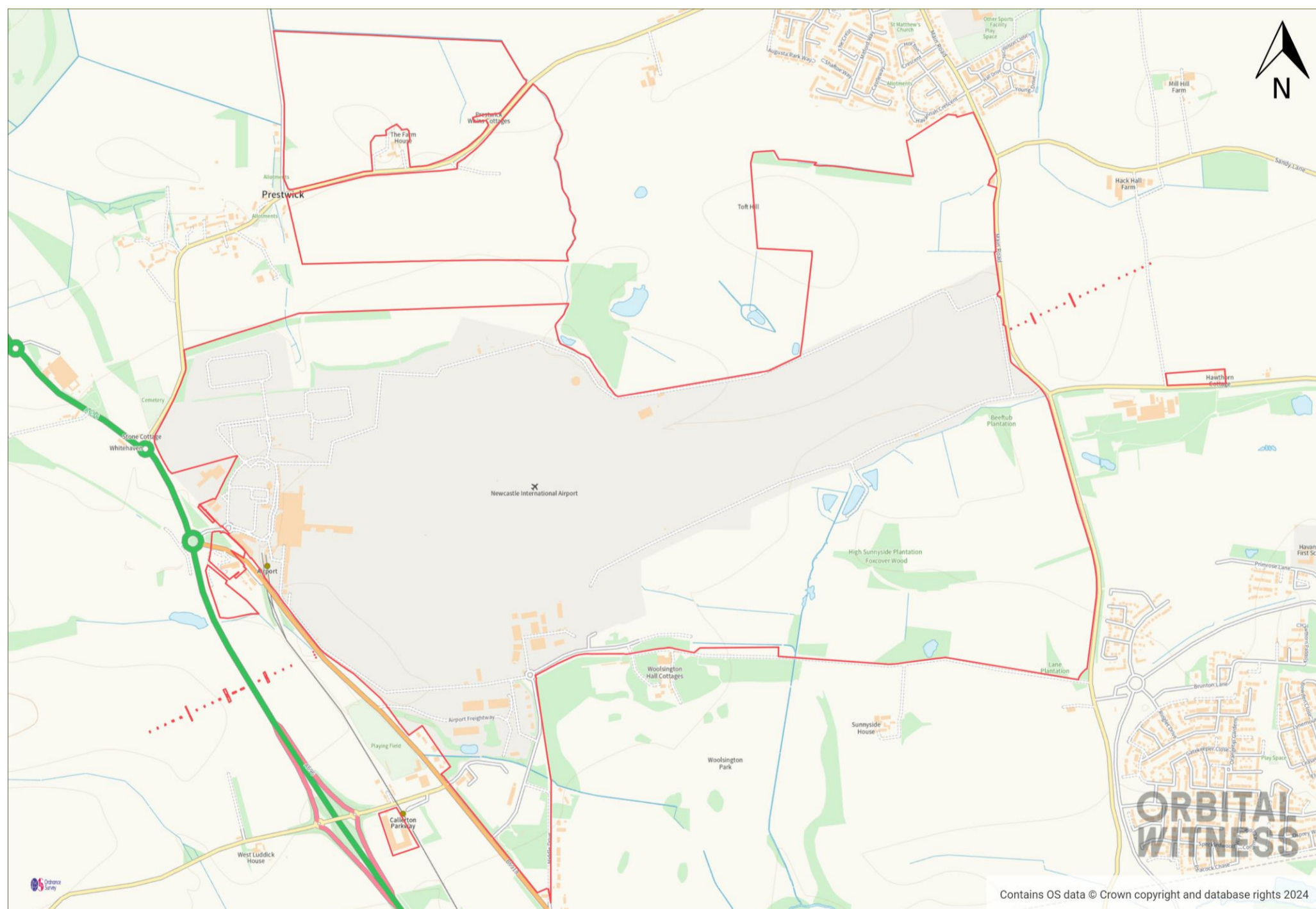
You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

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

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at:

<https://www.newcastleairport.com/about-your-airport/airport-company/injunction/>

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



IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE



BETWEEN:-

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

Claimants

- v -

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

ORDER

BEFORE: THE HONOURABLE MR JUSTICE RITCHIE sitting at the Royal Courts of Justice on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024.

AND UPON the Claimants' application for an injunction dated 16 July 2024 ("**the Application**").

AND UPON READING the Application and the first witness statement of Alexander James Wright dated 16 July 2024, the second witness statement of Alexander James Wright dated 17 July 2024, the third witness statement of Alexander James Wright dated 17 July 2024 and the fourth witness statement of Alexander James Wright dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants

AND UPON the Court granting the First Claimant an injunction on 18 July 2024 ("**the Leeds Bradford Order**") in respect of the land shown outlined in red on Plan 1 to the Claim Form ("**Leeds Bradford Airport**")

AND UPON the Court granting the Second Claimant an injunction on 18 July 2024 ("**the Luton Order**") in respect of the land shown outlined in red on Plan 2 to the Claim Form ("**Luton Airport**")

AND UPON the Court granting the Third and Fourth Claimants an injunction on 18 July 2024 ("**the Newcastle Order**") in respect of the land shown outlined in red on Plan 3 to the Claim Form ("**Newcastle Airport**")

NOW IT IS ORDERED THAT:

PERMISSION TO AMEND

1. The Claimants have permission to amend the Claim Form and Particulars of Claim relating to:
 - a. The description of the Defendants;
 - b. The plans attached to the claim form so as to use labelled “Plan 1”, “Plan 2” and “Plan 3”.
 - c. Annexing the revised plans referred to in the particulars of claim.
 - d. If so advised, by 4pm on 1 August 2024 to plead any claims against Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow.

Ritchie J

Made: 23.7.2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N

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

Claimants

-and-

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

Defendants

NOTE OF "WITHOUT NOTICE" HEARING BEFORE

MR JUSTICE RITCHIE

18 JULY 2024

Hearing 18.07.24

The Hearing commenced at 10.30am.

The Judge had read the evidence (except for Alex Wright w/s #2, which he took a moment to read at the start of the hearing) and the Claimant's skeleton argument, and had received the authorities bundle.

TMKC introduced the case as one under the newly described jurisdiction which has been in the Supreme Court in *Wolverhampton* – sui generis relief against Persons Unknown; no defendants of which Cs were aware and no steps taken to notify.

Mr Justice Ritchie was familiar with the jurisdiction having granted injunctions in favour of HS2 and Esso.

This is an emerging area of law and the principles expressed in caselaw are still in the nature of guidance and the courts are encouraged by the Supreme Court to make decisions as they unfold. The guiding principle that attracts the eye of equity is the "compelling need" which stimulates the court to intervene. The developments of the law and breaking down of headings is what is needed when compelling need is identified, and to satisfy the human rights aspect.

Preliminary Matters

TMKC explained that, because of *Wolverhampton*, this was not a without notice application in the ordinary sense, but the Cs had complied with it on a precautionary basis for the reasons set out in AW w/s #1 (HB/272-273).

TMKC addressed that the Claim Form + the Particulars of Claim needed to be amended but noted as there is no issue as to service this permission may not be required, nonetheless he sought permission to amend:-

1. the Claim Form (plans attached were not labelled); and
2. the Particulars of Claim (plans were attached to AW w/s but not POC despite being referred to)

Permission granted.

Witness Statements / Evidence

The Judge noted that para 7 of AW w/s #2 related to protests at Gatwick (no injunction in place) on 24 June 2024.

The Judge noted the arrests that had been made and referred to in AW w/s, but was critical that there was no copy of Mr McBride's witness statement, obtaining it online was not practicable. The Judge noted that it was hearsay evidence.

TWKC provided AW w/s #4 to the Judge (updated Plan 3A).

Issues

Judge's primary concerns:-

- 1- *Why have the defendants not been named or notice provided to the individuals, they being the ones alleged in the evidence as the guiding light / drum beaters. If they are known to be part of the persuaders then why aren't they defendants?;*
- 2- *General queries concerning clarity of the areas covered by the injunction, highways and third party land etc.; and*

- 3- *Definition of Persons Unknown ("PU") - currently the definition of PU would cover protesting about delayed luggage (for example) - the Judge considered that would be too wide and needs to be more focused.*

Titles

TMKC explained Plan 1 and Plan 1B.

To clarify the Judge's query on C's rights to claim an injunction over a national highway (included within the red line on Plan 1), TMKC explained it would be to restrain nuisance affecting the customers and operations of the airport; the byelaws themselves cover disruptive nuisance over the highway.

TMKC clarified Cs are not asking the court to grant an injunction in aid of the byelaws, and provided examples of terminal cases with injunctions granted over highways.

The Judge considered an example of individuals sitting in the tunnel and stated that it's got nothing to do with trespass. It is a nuisance to interfere with anyone's right with the use of the highway. The nuisance would be that it obstructs the passageway of staff and licences. It could also be framed within the economic torts.

TMKC discussed the runway lights; these are affected by complex tapestry of titles, however, the structures of the lights are owned by the Cs. The Judge considered that the ownership of the land did not matter because Cs owned the lights and there could be a danger if the lights were covered and the planes could not land because they could not see.

TMKC explained Plans 1A – 3A and 1B – 3B; the third party areas should not be carved out and to recognise that anyone protesting in these areas is doing so in the airport and it is not appropriate to try to draw that distinction. There is also potential for protestors to be misled / create confusion.

Airports' Distinctiveness

TMKC explained that airports are not like normal places. Even peaceful protests are problematic and could be used as a mask for more serious things. There is potential for a peaceful protest to become not peaceful and/or to be misinterpreted by security staff. Airports are key national infrastructure. Security is the single most important item on the agenda.

TMKC drew the Judge's attention to VJH w/s on responsibilities of operators (on safety); safety is an issue of huge importance and there is sufficient chain of evidence for the court to accept the submission.

TMKC discussed that the central element of this equitable jurisdiction is that anyone can come and say "no this is too wide" and at that point, there can be arguments about it. At this stage, it is appropriate to proceed on a precautionary basis which is intrinsic to this jurisdiction, at least when there is evidence that it goes beyond mere assertion.

TMKC explains that third party occupiers have been notified and no objections received to the claim.

Plans

Leeds Bradford Airport

TMKC explained Plan 1A and why internal layout plans of the green buildings have not been provided (complexity).

London Luton Airport

TMKC explained Plan 2B, Plan 2A (including the highways) and Plans 2C – 2I.

TMKC explained the railway which is within C2's titles / ownership.

Newcastle

TMKC explained Plan 3, Plan 3B, Plan 3A (as substituted by AW w/s #4) and Plans 3C-3D.

TMKC there has been no uniform practice developed in these cases about whether notice should be given to third parties (e.g. the difference in approach in claims by the MAG group airports with Heathrow).

Threat and the compelling need

TMKC provided summary of incidents AW w/s #1 - the environmental campaign in recent years and also referred to para 52 of AW w/2 #1 (HB/264) - Tweet by Just Stop Oil ("JSO").

Helps to explain why these injunctions are effective. They recognise that injunctions are special, still that much respect for the law.

The Judge queried whether arrested JSO members should be a named individual; TMKC explained that they are no longer considered to be a threat given that they had received sanctions.

TMKC explained that apart from the obligation to identify the name, notification should also be as effective as possible.

Judge was uncertain as to why individuals were not named as defendants where they could be as "troop leaders"; those that can be named, should be named but they should be notified at least, whether they are named is a matter for Cs.

TMKC refers to AW w/s #3 and the JSO letter to the prime minister and the explicitness of their recent statement on *taking action at airports* (HB/591).

Specific to the Airports (LBA/LTN/NCL)

Generic features which make airports vulnerable to peaceful protest which the attempted protest at Gatwick airport with the bandages evidences. The cascade effect of from one cancellation / delay also makes them particularly vulnerable and that they are dangerous places.

At these airports, the lack of airbridges create a special acute level of risk of protestors breaking away because passengers have to cross the apron to get to aircraft and runways are closer to terminals - when the passengers are out in the open, there are additional security risks.

Cs have tried to accommodate protest, there were cornered off protest areas for safe and peaceful protest; Judge proposed a recital in the Order for a contact for peaceful protests.

All the airports are also protected by byelaws which prohibit disruptive protest.

Draft Order

The Judge considered the definition of PU to be too wide "persons unknown whose purpose is or includes protest". The POC centre on protests that focus on fossil fuels. Appropriate wording is required that focuses on the actual substance of the complaint.

Cs have a continuing duty of full and frank disclosure (therefore it would provide to the Court all relevant information if it had to enforce the relief).

Cuadrilla – paras 60, 65 and 69 (AB/376) - no objection to framing an order which involves a subjective element. If there is a problem, C would have a duty to satisfy the evidential burden.

TMKC addressed other questions by the Judge:

1- Why have we not named individual – covered

The Judge granted permission to amend stating it will be “as you see fit”.

2- Areas covered which were highway and third party land

TMKC submits that in relation to all third party areas it is necessary to make the injunction effective, the supporting reason that protest activity on third party land and/or highways would be a nuisance, a direct tort. There is the issue of silent protest on third party land which would not be a nuisance, but that is caught by the first, we can't have situations where security need to monitor peaceful protest, not in an airport – elsewhere maybe.

3. definition of PU being too wide

TMKC did not develop further on this.

The Judge suggested adding a note to the order.

TMKC stated that the balancing exercise remains and sought that the Judge evaluates the submissions in light of the skeleton argument.

Judgement

This is an *ex parte* application issued on 16.07.2024 for injunctions against PU to exclude them from 3 airports and for alternative service provisions, extempore judgement fit within that period.

This Judgment is focused on LBA but will apply to LTN and NCL.

The POC identified third party areas over which Cs lacked possession (Plans 1A, 2A and 3A).

Cs set out that:-

- the public had implied consent to enter the airports;
- without any right to protest or such activities as had ben threatened by JSO;
- any person entering or staying on for protests would be a trespasser.

Third party areas were identified to which Cs are not entitled to possession but it was pleaded that Cs are entitled to protect their interest.

Protests on third party areas / highways would constitute a breach of the airports byelaws and in submission of this, suggested it would constitute a nuisance.

The Judge identified the various threats of protests as noted in the witness evidence (including at LTN); where the byelaws and breach thereof had no or little off putting effect.

Judge summarised the evidence in AW, VJH, AM and NJ w/ss.

The claimants sought injunctions to be reviewed every 12 months,

The cause of action: trespass, public/private nuisance. There is no claim for an economic tort or conspiracy. It is based on *quia timet* as there is no threat of direct action, but there is imminent threat.

Secondly, having looked at the disclosure that was provided in the professional bundle provided by Eversheds I consider that full and frank disclosure has been provided

Sufficient evidence: the evidence of ownership is sufficient and that the historic evidence is sufficient for proof of a risk of trespass and of public/private nuisance at the airport or the roads.

A realistic defence: That is on the basis of if it is a defence to protesters entering these airports with the intention to disrupt or breach the byelaws, the range of protests that has been used by environmental groups in the past has been very wide, including locking on, damaging structures, spraying paint, sit-ins/glue-ins, and many others. For such activities I do not foresee any realistic defence. I take into account of course that any injunction will be against unlawful activities or in breach of the byelaws.

Balance of convenience / compelling justification: is there a compelling reason to grant the injunction - the most relevant event is the threat made to the new Prime Minister of the UK which is comparable to previous threats made, these threats have a history of not being made lightly and such threats being seen through, including trespass, public and private nuisance. The other public and direct activity which has created torts and perhaps crimes, was Stansted and Farnborough, the threat to other airports may have been undermined by substantial arrests including the one relating to the Gatwick bandages arrest.

Airports are part of the national infrastructure which are actually sensitive to threat, they are frighteningly complicated organisations involving the movement of thousands of members of the public near the movement of huge and highly combustible equipment. They are particularly sensitive to direct action/unlawful protest.

Fear of CEOs is that terrorism is facilitated by chaos. Human rights of passengers who businesses or holidays may be catastrophically interrupted or cancelled. Although not pleaded, it is worth taking on the knock on effect on employment, however, I don't have those in the front of my mind because there is no pleading in for economic torts.

JSO and XR have made good on their threats in the past in a way that has caused enormous tax payer and private financial expense and disruptions at oil terminals, roads, sporting events and as threatened, potentially at airports. I also take into account that the evidence before me shows that previous High Court decisions have been effective in preventing unlawful activity. Also take into account the protesters lawful right to express their views, lawful protesting set out in Mr Hodder's statement is the right of every English person and is not to be restricted.

There is compelling justification to prevent fossil fuel protesters from entering or staying at these three airports and from protesting there and from any direction which could cause chaos / danger or constitute the torts set out in the particulars of claim.

Would damages be an adequate remedy: Obviously not: (1) PU by definition are unknown; and (2) I do not know of any case in which a PU has stumped up for any chaos they have caused.

I do not think they would go anywhere near to compensate the chaos that could be caused at an airport, for instance, on the tarmac. Therefore, damages are not an adequate remedy. It is better to prevent the chaos than compensate / fail to compensate.

Identifying PUs: Needs to include "fossil fuels". It is a duty of this court, to make absolutely clear the boundaries of the definition of PUs and I consider there is a potential

lack of clarity in defining them as protestors. There may be lawful protests that would otherwise be caught by the current too wide definition.

Scope of the injunction: I do not consider that there is a compelling justification for the injunction to cover flights going in and out of the airport.

Injunction: I consider that this is sufficient but I would add "for the purpose of fossil fuel", and consent of Cs.

The geographic boundaries: In relation to areas within the possession of the claimant and private jet areas, in view of what happened on Stansted, it is necessary that the injunction covers those private operations which are at least within the freehold ownership.

Finally, landing lights – I consider that the injunction should cover the landing lights as they are equipment owned by the Cs and if Ds disrupt it would be extremely chaotic and dangerous.

Temporal limits: review annual is sufficient, safe and fair way to protect rights of PU.

Service: methods of alternative service, agreed as per draft Order and provided to Reuters.

Right to vary or set aside: right should also be granted specifically to Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow, those 3 persons should be served directly by alternative service (website/email address).

Tidy up matters: whilst Public Order Act 2023 and Byelaws have changed the landscape somewhat in this application, they do not undermine the need for a proactive approach toward what would be catastrophic tortious damage.

Permission to amend CF and POC.

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

MR JUSTICE RICHIE

BETWEEN:

LEEDS BRADFORD AIRPORT LTD & ORS

Claimant

- and -

PERSONS UNKNOWN

Defendants

MR T MORSHEAD KC appeared on behalf of the Claimant
NO REPRESENTATION on behalf of the Defendants

JUDGMENT

TRANSCRIPT APPROVED

1. This is an ex parte application issued on 16 July 2024, for injunctions against Persons Unknown, to exclude them from three airports and for alternative service provisions. It was listed for two and a half hours and so I am giving an ex tempore judgment to fit within that period.
2. The action was commenced by a claim form issued on 16 July 2022, for an injunction against trespass, private and/or public nuisance by persons unknown. The particulars of claim served with the claim form defined persons unknown in two categories: the first category is in three parts. There must be (1) a purpose to protest; (2) on the land of the Claimants who run the airports or on their clients land; (3) the unknown person must enter either the land or a flight on the land, and by "flight", I mean aircraft. The second category covers a protest which actually takes place on the premises. Most of the examples I will give in this judgment are going to relate to Leeds Bradford Airport but they apply equally to the other two airports the subject of this claim, which are Luton London and Newcastle International. The particulars of claim went on to set out the areas over which the injunctions are claimed shown specifically on the three numbered plans.
3. The Claimants set out that the public have implied consent to enter the airports for travel, drop off, meeting and other lawful business, but that no one has the right to enter for protests or such activities as have been threatened by "Just Stop Oil" (JSO) recently. It was pleaded that any person entering or staying on the airport land for the purpose of protest would be a trespasser. Third party areas were identified, in which the Claimants are not entitled to possession, but it was pleaded that the Claimants are entitled to protect their rights by extending the injunction over the third party land if such protection by injunction is necessary and proportionate to give effect to the injunction over their own land. Highways constituted some of the third-party land and if protest occurred on the identified highways it was pleaded that would interfere with access to the Claimants' airports, and would constitute a breach of the airport's bylaws. In submissions it was suggested it would constitute private and/or public nuisance.
4. The pleading set out various threats made by environmental organisations, including a threat on 13 September 2023, in relation to highways protests and on 9 March 2024 at a meeting in Birmingham, reported by the Daily Mail, allegedly of JSO, threatening direct

action at airports in the summer, including: cutting fences, cycling on runways, climbing onto planes and staging sit-ins. Website threats were also set out on the JSO website involving non-violent civil resistance at airports. JSO had threatened to put together teams of ten to fourteen people, collecting altogether around 200 people, to carry out this direct action. They also published a fund raising or crowdfunding page, on which it was said that this would be their most audacious action yet.

5. By an email dated 6 June 2024, sent out to JSO members, it was said that this summer action at airports was coordinated internationally across Europe, taking the fight to airports. Four days before, on 2 June 2024, environmental groups through Extinction Rebellion had carried out direct action at Farnborough, and 14 days later on 20 June 2024, direct action had taken place by JSO at Stansted, including spraying orange paint on a private jet.
6. It was pleaded that Extinction Rebellion had carried out repeated actions at Luton Airport between 2019 and 2022. It was pleaded there was a strong probability of direct action at airports this summer and that the Claimants sought injunctions to prevent apprehended trespass and nuisance. It was that pleaded direct action at airports was dangerous and was banned by the byelaws of the airports. It was pleaded that the byelaws and enforcement of breaches thereof only resulted in modest benefit and had no or little “off putting” effect. The *Public Order Acts 1994 and 2023* were pleaded, but it was pleaded that those would not protect the Claimants in advance. The Claimants sought injunctions to be reviewed every 12 months for Persons Unknown not to enter or occupy the airports and protest.
7. Evidence has been put before me from the following witnesses: Mr V Hodder, the Chief Executive Officer of Leeds Bradford Airport, in a witness statement dated 15 July 2024; Mr Alberto Martin, the Chief Executive Officer of Luton Airport, in a witness statement dated 15 July 2024; Mr Nick Jones, the CEO of Newcastle Airport, in a witness statement dated 16 July 2024; and Mr Alexander Wright, a lawyer at Eversheds, in four witness statements, the first dated the 16 July 2024, the second dated 17 July 2024, the third and fourth dated variously 17 and 18 July 2024.

8. Mr Hodder asserts in evidence that JSO threatens to disrupt Leeds Airport in the summer of 2024 and points to there having been some protests already and previous Extinction Rebellion protests. He gives evidence that there is a £100 million expansion going on at the airport which is jointly owned with Luton and Newcastle by an organisation. The Claimants are not trying to restrain peaceful, legitimate protests, however, the airport at Leeds carries four million passengers per annum and intends to expand to carry seven million passengers per annum. They would expect about 17,200 passengers per day, alongside 25 commercial deliveries per day. He set out that ten commercial airlines operate at the airport, alongside private aircraft.
9. He gave evidence that passengers have a license to enter the airport, but protesters do not. He set out the detailed statutory obligations on the airport owners in relation to safety and maintenance and clearly explained that the Claimants would have to shut down any areas of the airport which had become unsafe and would have to remove obstacles and debris from runway and other surfaces. He set out the byelaws of Leeds Airport which: required the public to leave if requested to for causing disturbances, prohibited demonstrations, prohibited obstructions or tampering with equipment, prohibited flags and banners, prohibited climbing walls and fences, and prohibited causing dangers.
10. He set out nine historic protests about the Leeds Airport between June 2019 and March 2022, by Extinction Rebellion, healthcare workers and Stay Grounded UK. All of those, except one, were lawful protests and, in my judgment, none of them justify the relevant requirements for granting **ex parte** injunctions against Persons Unknown. The one which was potentially not lawful, involved protesters chaining themselves to the Civic Hall railings, all the rest occurred in Leeds and were focussed either at the Magistrates Court or at the Civic Centre.
11. Mr Hodder also summarised activities at other airports, but I will come to those when dealing with the evidence of Mr Wright. Indeed, he relied on the evidence of Mr Wright to assert that there was a real and imminent risk that needed an injunction. He set out that Leeds Airport, on request, had previously granted specific areas for protestors to carry out peaceful protests, but that no requests had been made by Just Stop Oil or any environmental protest group for this summer. He set out the exquisite vulnerability of

airports due to their operational complexity and of these three airports due to the nearness of the terminals to the runways and the lack of airbridges taking passengers directly into aircraft. In these airports many passengers walk across the tarmac to get onto an aircraft.

12. He pointed out the vulnerability of Leeds due to the public highway crossing the middle of the airport, underneath the runway and warned of the huge financial costs of disruption. He asserted the Claimants had reasonable fears that Leeds would be the target of protestors in the summer, which would include accessing airside, damaging property and runways. He set out his evidence on the balance of convenience, including the risk of very serious disruption, the lack of advanced warning and that damages would not be an adequate remedy. The first Claimant only seeks to restrain unlawful activity. He asserted that the junction would be an effective deterrent because it had been in other fields of commercial enterprise. He accepted that the Claimant had never enforced its byelaws previously through criminal prosecution, but that he feared that any such prosecution would cause delay and might be taken over by the DPP, would be reactive and not proactive and would only result in a small penalty. He asserted, importantly, that he considered the threat to the airport was credible, due to the environmental organisations' historic direct actions and that the significant harm that would be caused if they did so again and asserted that this justified the injunction.
13. He set out recent injunctions obtained by London City; Manchester; Stanstead; East Midlands and Heathrow airports variously on 20 June, 5 July and 9 July 2024, and then he exhibited those injunctions to his witness statement. I have read them. He offered undertakings. In the exhibits it is clear that there were environmental attacks (reported in the press) at Farnborough and Stansted, which were unlawful and direct action was taken by the protesters. Chief Superintendent Howells set out that many people had been arrested who were JSO members planning to disrupt airports across the country. I am afraid I have not noted the dates of those arrests and it is not apparent from the exhibit. He also exhibited news reports of a direct action protest at Munich in February 2023, but I will come to that later.
14. Alberto Martin sets out matters in relation to Luton Airport. I have taken all of those into account, but it is not necessary for the purposes of this judgment to summarise that evidence, save to say that he listed the historic events at Luton which included four events

only one of which was Direct Action. In January 2020, Extinction Rebellion marched from the airport to the town; on 29 August 2020, Extinction Rebellion accessed the airport terminal and roundabout and entrance; on 2 December 2021, protesters attended the local authority meeting and on 30 May 2024, protesters protested at Luton Train Station. He set out his fears and apprehensions about protests within Luton Airport, and made the same or similar submissions about the balance of convenience, and he offered an undertaking.

15. Nick Jones, the CEO of Newcastle Airport gave evidence in his witness statement. Again, I will not summarise it here, because it follows the same course as the previous two Chief Executive Officers.
16. Evidence was provided by Alexander Wright, a solicitor from Eversheds. It is important when providing such evidence that the statements at the start are set out: (1) that the evidence provided is from within the witness' own knowledge and (2) where it is not within the witness' knowledge and is hearsay, that the sources should be stated. That promise regrettably was not always fulfilled throughout the witness statement. I make no criticism of Mr Wright for that, because he was clearly doing his best, but it is very important on ex-parte applications for the evidential rules to be followed. He set out that Roger Hallam was the founder of JSO in February 2022, and he had previously founded Extinction Rebellion. This was apparently obtained from the JSO website. He asserted, through hearsay obtained from an unknown source, because it is not stated in the witness statement, that in September 2019, Roger Hallam flew drones at Heathrow and was convicted of a conspiracy to cause a public nuisance and given a two-year prison sentence which was suspended. He asserted from Roger Hallam's own website that he had been imprisoned three times.
17. In relation to previous JSO actions, Mr Wright set out twenty-nine direct actions or potentially such, which were probably unlawful and which included invading: the Bafta Ceremony, Everton Football Club, art galleries, Silverstone Grand Prix, the National Gallery, petrol filling stadiums, Central London roads, the Queen Elizabeth II bridge, Harrods, MI5, M25 junctions, the Snooker Championship, the Chelsea Flower Show, the Rugby Premiership final, the Ashes, the Lords cricket grounds, Wimbledon, The Proms, The Open Golf Championship, a performance of Les Miserable, Parliament Square, the

Royal Courts of Justice, the British Library, a wedding, Stonehenge and Stansted Airport. He recited that injunctions had been granted by the High Court against Just Stop Oil, Extinction Rebellion and Youth Climate Swarm for direct actions taken between March and April 2022, at various oil terminals, including Kingsbury in Staffordshire. One of those was obtained by Valero Energy.

18. He set out that Ben Smith, the Chief Constable at Warwickshire, in a witness statement dated 10 April 2022, had summarised that hundreds of arrests had taken place before those injunctions were issued and there were significant costs of policing the various protests around the country at oil terminals. These produced significant adverse effects on the community.
19. In relation to civil claims: there were eight Queens Bench Division actions set out in the witness statement. Mr Wright asserted, without giving the source of the evidence, that the injunctions stopped the direct protests and that there had been no applications to commit for contempt, certainly within the knowledge of Eversheds who were involved in some of those actions. The source of that information can be implied. He also set out that a variety of Local Councils and the National Highways organisation had obtained injunctions and he pointed to JSO posts which appeared to accept injunctions made protests impossible.
20. Turning then to the threats in relation to these injunctions. The key ones were obtained by an undercover journalist from the Daily Mail, at a meeting with JSO on 9 March 2024, in which a woman called Indigo Rumbelow stated the JSO planned to gather at the airports and use direct action by cutting fences, cycling on runways and climbing onto airplanes. Further investigative journalism was reported by the Evening Standard of another meeting chaired by Phoebe Plummer, which set out “radical”, “unignorable” action in alliance with a European group called “A22”. Mr Wright set out excerpts from the JSO website that they were planning to put together teams of ten to fourteen people who would risk arrest. The JSO boasted that their new actions were going to be big. On their fundraising page they boasted gathering £24,275 for this endeavour. I note that neither Mr Wright nor the Claimants made any effort to identify the names of the account holders or the account numbers by approaching Mr Hallam, or either of the two defendants, Indigo Rumbelow or Phoebe Plummer or applying for disclosure.

21. Mr Wright set out that the police had made various arrests for conspiracy to disrupt national infrastructure in June 2024, then he set out EU/USA wide airport protests in Munich, Farnborough, Stansted, Dusseldorf and Boston (I believe that is Boston USA) and Braunschweig, which I believe may be in Austria, but it is not stated. Those protests taking place between November 2022 and June 2024, the latest two being in England.
22. Mr Wright then set out that he did not know the names, and the Claimants did not know the names of the persons who would protest. This rather undermined his evidence about Mr Hallam, Ms Rumbelow and Ms Plummer and I shall come to that later. In relation to service, he explained that the Claimants had concerns that the PU's would deliberately target airports if served with a notice of application for the injunctions, and that direct action might be accelerated by service although no evidence was put before the Court in support of that assertion. He set out previous ex parte injunctions for airport owners granted by Julian Knowles J and her Honour Judge Coe KC, sitting as a Deputy High Court Judge.
23. In a second witness statement he set out a report of how protestors had been arrested on 25 June 2024 by the police, which suggested that they were carrying bandages, which they were intending to deploy at Gatwick Airport. The news report is short and does not provide much detail. In a third witness statement, a very worrying threat is laid out, sent by Just Stop Oil to the new Prime Minister, on 17 July 2024, threatening a campaign of non-cooperation at airports unless the government complied with various demands in relation to fossil fuel. In a fourth witness statement, Mr Wright provided some evidence about property rights.
24. That brings me then to the matters that need to be determined in considering whether to grant the injunction requested. I am grateful to counsel for his careful and full submissions. I am going to follow the checklist set out in the *Valero Energy Ltd & Ors v Persons Unknown* [2024] EWHC 134, bearing the time in mind. I take into account the guidance in *Canada Goose v Persons Unknown* [2020] 1 WLR 2802, and *Wolverhampton City Council v London Gypsies and Travellers* [2024] 2 WLR 45, and *Cuadrilla Bowland Ltd v Persons Unknown* [2024] WLR.

THE CAUSE OF ACTION

25. The cause of action pleaded by the Claimants involves trespass, private and public nuisance. There is no claim for an economic tort or conspiracy. It is based on quia timet, because as yet there has been no group action at any of these three airports. However, it is clear from the authorities that past direct action is not a prerequisite of granting a quia timet injunction. By quia timet I should say I mean “what we fear”. Secondly, having looked at the disclosure provided in the professionally and fully provided bundles supplied by Eversheds and the Claimants, I consider that there has been full and frank disclosure by the Claimants seeking injunctions against the Persons Unknown. Thirdly, I have to consider whether the evidence is sufficient to prove the claim.
26. At this stage, I am content to find that the ownership evidence is sufficient and that the historic evidence is sufficient for proof of a risk of a trespass, of private nuisance or of public nuisance at the three airports or the approach roads included within the red circumference lines drawn on the three plans.
27. Next, I have to consider whether there is a realistic defence. Is there any defence to protestors entering, for instance Leeds Airport, intending to disrupt directly the activities at Leeds Airport by any physical method, or intending to protest in breach of the byelaws. The range of potential protests that has been used by environmental groups which involve themselves in unlawful direct action in the past, has been very wide. It has included trespass and then locking on, digging, climbing structures, damaging structures, spraying paint, blocking off structures, sit-ins and many others. For such activities, I do not foresee any realistic defence. I take into account, of course, that any injunction that will be granted, will be against unlawful activity, or activity in breach of the airport's byelaws, not against lawful activity.
28. I then come to the next part of this decision, which is the balance of convenience. That test is not the correct test on ex parte injunctions against persons unknown. The test is whether there is a “compelling justification” for granting the injunction. To assess that I need to look first at the key threats and historic events I have set out. The most relevant, it seems to me, is the threat made to the new Prime Minister of Great Britain, which is parallel with the threats made to a previous Prime Ministers in the last two years, relating to oil terminals. These threats have a history of not being lightly made and have a history

of being seen through by illegal, unlawful activity, including trespass, public and private nuisance.

29. The other direct activity which involved torts and crimes took place at Farnborough and Stansted. The threat in relation to other airports may well have been reduced or undermined by Police actions in carrying out substantial numbers of arrests around the country, including the one relation to the Gatwick bandages protesters. These are not fanciful concerns.
30. Secondly, I need to look at the institutions which are bringing these applications. Airports are a part of the national infrastructure which are acutely sensitive to terrorist threats and are highly regulated in relation to safety, maintenance and security. They are also complicated organisations, involving the moment of thousands of members of the public, close to highly combustible materials and within fast-moving, huge pieces of equipment. Such organisations are acutely sensitive to chaotic disruption caused by unlawful direct action.
31. I also take into account the fear, which I think is justified, of the Chief Executive Officers, that terrorism is facilitated by chaos. I take into account the human rights of the passengers, adults and children, families and individuals, whose business trips and family holiday trips would be potentially catastrophically interrupted, delayed or cancelled by disruption at any of these airports in the summer season. Although not pleaded, it is not irrelevant to take into account the knock-on effect on employment, union members and the businesses which are run in the airport and which run the airport, financially. However, I do not have the financial aspects at the front of my mind because there is no pleaded economic torts claim.
32. I take into account that JSO and Extinction Rebellion have made good on their threats in the past, in a way which has caused enormous taxpayer and private financial expense and disruption, at oil terminals, on roads, at sporting events and has threatened airports. I also take into account that the evidence before me shows that previous High Court injunctions have been effective in preventing unlawful behaviour. I take into account the rights of the protestors, lawfully to express their views and how important it is that those rights are not fettered. Classic examples of those are the list of events set out in

the witness statement of Mr Hodder in and around Leeds, particularly at the City Council. Lawful protesting is the right of every English and Welsh person and is not to be restricted lightly.

33. I have come, at this stage, to the firm judgment that there is compelling justification for granting injunctions to prevent fossil fuel protestors from entering or staying at these three airports, and from protesting there and from any direct action which could cause chaos, danger and would constitute the torts set out in the particulars of claim.

34. Next, I have to consider whether damages would be an adequate remedy. In my judgment they would not be an adequate remedy for a number of reasons. Firstly, because the PU's are, by definition, unknown. Secondly, because there is no evidence before me and I know of no case in which a PU has stumped up damages for any of the protests carried out at oil terminals or motorways, at finals of sporting events for the chaos they have caused. Thirdly, because none of the Defendants in these cases have made any effort to disclose Just Stop Oil's bank accounts and whether they are in the names of Mr Hallam or Phoebe Plummer or Indigo Rumbelow or anybody else, nor to disclose how much money is within those accounts. Even if they did, I have no evidence that those sums would go anywhere near to compensating the aircraft carriers, the airport owners, the delayed or denied passengers, the shops or the emergency services for the chaos that would be caused by a direct action protest at an airport, for instance, on the tarmac. It seems to me that damages are plainly not going to be an adequate remedy, nor will there be adequate damages, to provide any remedy on the evidence before me. It is better to prevent the chaos than to fail to compensate for the chaos.

35. Coming then to partly substantive and partly procedural requirements, as to identifying PU's, I do not consider that the current definitions of PU's are satisfactory and I will require the definitions to qualify a protest by use of the words "About fossil fuels". I have listened carefully to the well-structured and persuasive submissions of Mr Morshead, but I am afraid I do not accept them. It is the duty of this Court, as required by the Appellate Courts, to make absolutely clear and in plain language, the definition of PU's. I consider that there is a potential lack of clarity in defining PU's just as "protestors". Many people protest to many aircraft carriers and airports about a huge range of things, including delayed luggage, dirty floors, poor announcements and other

matters. There may be protests, individually or by families or groups, that would otherwise be caught by the current, too broad, definition.

36. Having carefully listened to Mr Morshead's submissions about an injunction extending to the aircraft owned by other organisations who are not the Claimants, I am afraid I do not consider that there is a compelling justification for the injunction covering the flights going in and out of the airports. I consider that the injunctions should be restricted to the areas within the red boundary and that is sufficient to capture fossil fuel protestors who enter the boundary or go to the terminal. Any who get through security will most likely have their banners and/or their orange paint or lock-on devices, and they would have to go through the security gates, unless they cut their way in through the perimeter fencing. If they get out to walk across the tarmac, they will be caught by the injunction. If they wish only to protest by getting onto the flight, then I consider that whilst that protest is equally dangerous and would cause chaos, that it is insufficiently immediate for this to be covered by an injunction. It may be a different matter if one of the aircraft carriers wishes to join the proceedings and ask for the injunction to be extended to cover their aircraft, on the basis of actual perceived risks, but I would need to see the evidence of that.
37. In relation to the terms of the injunction as drafted, I consider that they are sufficient save, for instance in relation to Leeds, they say with immediate effect unless they are discharged or extended by a further order, the first defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport without the consent of the first Claimant. I would add to that "for the purpose of protesting against fossil fuels" and I would add the word "prior" to "the consent of the first Claimant". Subject to that, it seems to me that that matches the pleading for trespass and/or private or public nuisance. This of course would be a private nuisance if it was within the aircraft boundaries.
38. As for the geographic boundaries, I have looked very carefully at the helpfully coloured plans which show areas owned and possessed by the Claimants; areas which are owned but not possessed by the Claimants, for instance, those run by the private jet companies; and areas leased out to shops. Finally, the areas not owned by the Claimants on which they have equipment; I consider that for the areas within the Claimant's possession,

injunctions should be granted. I consider that, for the areas within the possession of the private jet operators, it is relevant for them to be asked whether they support the injunction. I have seen no email which says they directly do support it. I was given the submission by counsel that generally, they support it. It seems to me at this stage, in view of the fact of what happened at Stansted, which was direct action on private jets, that it is necessary for the good operation of these airports, that the injunction covers those private operations which are within at least the freehold ownership of the airports, even if they are let out to the private organisations.

39. Finally, in relation to the landing lights, I consider that the injunction should cover the them. They are equipment owned by the Claimant organisations and if protestors seek to disrupt night flights, they could disrupt the effective operation of those landing lights. That could be extremely chaotic and dangerous. The particular legal niceties of who owns the land, it seems to me, do not affect the necessity for those to be covered by the injunction. I rely in relation to that on paragraph 50 of the judgment of Leggatt LJ, in his judgment in *Cuadrilla*
40. In relation to the temporal limits, I consider that the request to review annually is an efficient, safe and fair way to protect the ECHR rights of Persons Unknown. In relation to service, I consider that the methods of alternative service, as set out in the draft order, namely a specific injunction page on the Claimants' website, sending emails to Just Stop Oil and Extinction Rebellion email addresses and affixing notices at and around the three airports, are sensible ways of bringing the injunctions to the attention of the Persons Unknown. What should be added to that is that the injunctions should be provided to the Judicial Press office and Reuters, so that they can be used by press organisations to publicise their existence. That should be added to the alternative service provisions.
41. The right to vary or set aside should of course be included in the order and that right, it seems to me, should also be granted specifically to Mr Hallam, Phoebe Plummer and Indigo Rumbelow. Those three persons should be served directly, either through any addresses given on Mr Hallam's website, or by alternative service on the Just Stop Oil and Extinction Rebellion's email addresses.

42. There are a couple of tidy up matters I should deal with in this judgment. The first is alternative remedies. I should make it plain that I have considered the enforcement of byelaws by criminal prosecution and the enforcement of the *Public Order Acts 1994 and 2023*: sections 1, 2 and 7. Whilst those have changed the landscape somewhat in this application for an injunction, I do not consider they undermine the need for a proactive approach in avoiding what could be catastrophic, tortious damage for the Claimants and to their customers. I should also say that I have granted permission to amend the claim to tidy up some defects in the plans and to consider economic torts, naming defendants and other matters. I do not restrict the amendment in any way, I have just given a general permission to amend the particulars of claim which have not yet been served.
43. To facilitate the freedom of speech of protestors I have invited the Claimants to put a recital in the quasi-final injunction, setting out the contact details for the staff members, who will offer to consider and, if appropriate, grant permission for controlled protest areas within the three airports. There was evidence before me that this has been done before, and it seems to me that it is appropriate for the contact details to be made available to those recitals.

END

(This judgment has been approved by the judge)

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR JUSTICE BOURNE

ON: 24 June 2025

B E T W E E N : -

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



-and-

KB-2024-002317

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

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the injunction made by Order dated 19 July 2024 by Ritchie J (“**the Ritchie J Order**”)

AND UPON the Claimants’ application dated 2 June 2025

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

AND UPON reading the application and the witness evidence in support

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

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

IT IS ORDERED that:

1. The Ritchie J Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 2 of the Ritchie J Order).

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

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

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

Hearing Note – First Annual Review Hearing of Airport Injunctions

24 June 2025 (Court: Court 14)

Before: Bourne J (Bourne J)

For the Claimants: Timothy Morshead KC (“**TMKC**”) with Evie Barden

ATTENDANCE

No person appeared to oppose the applications, noted that the hearing had been listed for a day due to the possibility that individuals may have wished to attend and to make representations. TMKC advised Bourne J that the hearing had been notified as required by the various Orders and that, if any member of the public wished to attend or make representations, this hearing provided the opportunity to do so.

PURPOSE OF THE HEARING

The hearing was the first annual review of airport-related newcomer injunctions granted last year. TMKC explained that the various Claimants sought continuation of the existing injunctions, with draft forms of order to continue the injunctions and to address case-management matters.

Consideration given to the approach to be adopted, proceeded on the basis that the review was not a merits rehearing. The question to be considered was whether there had been a material change in the background circumstances diminishing the need for the injunctions, having assimilated sufficient background for that review.

NOTIFICATION AND SERVICE

TMKC submitted that notification had been given as required by the Orders. Bourne J was also taken to evidence from Mr Wortley explaining how the Orders had been served last year, with a typographical correction to paragraph 11.2: the date should read 21 June 2024, not 21 August 2024.

CLAIMANTS’ SUBMISSIONS

TMKC submitted that a concise, de minimis approach should be adopted, consistent with the approach in the Valero review hearing, because there had been no material change that undermined the basis on which the injunctions had been granted.

The Claimants’ position was that the injunctions should be reviewed together, rather than formally consolidated, because that was good case management. The Bourne J agreed.

TMKC submitted that there remained a compelling need for the injunctions. Although Just Stop Oil had made a March 2025 announcement suggesting that direct action would stop, subsequent communications and reports, including the GB News report and the 14/15 June 2025 Seeds of Rebellion event, made it unsafe to treat that announcement as a complete renunciation of direct action.

TMKC explained that the Claimants also relied on evidence that other groups, including Youth Demand, Extinction Rebellion and Fossil Fuel London, had not renounced direct action, and that a lone campaigner could act without affiliation to any group.

TMKC submitted that airports were particularly sensitive environments: the public cannot be kept out, protestors may intermingle with passengers, disruption can have cascading effects, and security concerns mean that a high premium is placed on orderly conduct.

TMKC referred to the police correspondence. The National Police Coordination Centre email taking account of the existence and effectiveness of injunctions; local police advice to London City Airport was that an injunction remained useful.

Discussion on Gatwick Airport and potential breach of their injunctions in July 2025, no knowledge as to whether committal applications were made and why not, if not.

TMKC submitted that, subject to the above, the absence of airport direct action since the injunctions were made was consistent with the injunctions working as a deterrent, rather than demonstrating that they were no longer necessary.

On proportionality and Convention rights, TMKC submitted that there had been no relevant change in the law, that the balancing exercise undertaken last year could be relied on subject to updated evidence, and that Article 10 and Article 11 rights could be exercised away from the airport areas.

FORM OF ORDER SOUGHT

TMKC invited Bourne J to retain the existing descriptive approach to “persons unknown”, rather than reducing the description to “persons unknown” only, noting Soole J’s approach in the Cambridge case, MBA Acres and the need for defendants to be defined as precisely as possible.

TMKC also invited the Court not to require permission before any application for committal. TMKC submitted that any issues arising from trivial or overzealous enforcement could be dealt with at the committal hearing, that no such applications had yet been made, and that there was no pattern of overzealous enforcement by the Claimants.

TMKC explained that the Claimants sought to homogenise the orders where appropriate. In relation to London City Airport, the relevant Claimants sought an amended plan to reflect a current ownership position, including an additional area let to a third party.

Hearing adjourned for Bourne J to consider matters ahead of issuing judgment.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Royal Courts of Justice
Strand
London, WC2A 2LL

Wednesday, 26th August 2025

BEFORE:

MR JUSTICE BOURNE

BETWEEN:

LONDON CITY AIRPORT LTD & ORS

Claimants

- and -

PERSONS UNKNOWN

Defendants

MR T MORSHEAD KC, MS E BARDEN (instructed by Eversheds Sutherland International LLP) appeared on behalf of the Claimant
THE DEFENDANTS were not present and not represented

JUDGMENT

(Approved)

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(Official Shorthand Writers to the Court)

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1. MR JUSTICE BOURNE: At this hearing I conducted the first annual review of injunctions granted at the separate hearings of four claims last year, concerning activities by environmental protestors at a total of ten airports at different locations in England. The relevant airports are identified in each order.
2. The claimants were represented by Mr Morshead, King’s Counsel and Ms Baden of counsel. There was no appearance by any defendant or by anyone expressing opposition to the continuation of the injunctions.
3. The injunctions were sought because in 2024, airports in England and elsewhere became targets in campaigns of disruptive environmental protest, notably by the campaigning group, “Just Stop Oil” (“JSO”). Individual airports and groups of airports sought injunctive relief against “Persons Unknown”, invoking the “newcomer” jurisdiction as explained by the Supreme Court in *Wolverhampton City Council v London Gypsies and Travellers* [2023] UKSC 47, [2024] 1 AC 983 (“Wolverhampton”).
4. I have read the judgments given when the original injunctions were granted of Julian Knowles J (20 June 2024, KB-2024-176) HHJ Coe KC (5 July, KB-2024-002132) and Ritchie J (19 July 2024, KB-2024-002317). I have also seen a note of what was said by Jacob J in KB-2024-002473 on 6 August 2024.
5. By way of context, I note that orders were also made at hearings in other claims concerning Heathrow (Julian Knowles J, 24 July 2024), Gatwick (Ritchie J, 19 July 2024) and Southend Airports (Farbey J, 14 August 2024). This review does not encompass those three cases.
6. Each judge was satisfied that an injunction was necessary to restrain the threat of tortious conduct and that it was just and convenient to make an order. In particular, because of threats of unlawful action by protest groups, viewed in the light of some previous incidents, and the potential for such action to cause health and safety risks (to the public, airport staff, emergency services and/or the protestors themselves) and delay and disruption to the public. In addition, each judge was satisfied that it was appropriate to grant injunction against “Persons Unknown.”

7. I shall note increase the length of this judgment or extend the corpus of judicial discussions of this broad subject by repeating the statements of legal principle and factual considerations, which were set out by the judges when granting the injunctions last year.
8. It is, in particular, unnecessary for me to explore some distinctive characteristics of these cases which were considered by the judges, notably the fact that the claims concern a combination of (1) land owned by the claimants, (2) land not owned by the claimants but on which there is airport infrastructure and (3) public highways in and around the airports. The injunction granted to London City Airport covers land in category (1) only, whereas the injunctions in the other three cases cover all three categories. The claimants are not seeking any geographical expansion of the injunctions granted last year. London City Airport seeks, and I will grant, permission to amend to reflect a change of ownership of one specific area.
9. The nature of a review hearing of this kind was considered in *Wolverhampton* at paragraph 225, where the Supreme Court observed that the hearing:

“...will give all parties an opportunity to make full and complete disclosure to the court, supported by appropriate evidence as to how effective the order has been, whether any reasons or grounds for its discharge has emerged, whether there is any proper justification for continuance; and whether and on what basis, a further order ought to be made.”
10. In *High Speed Two (HS2) Ltd & Anor v Persons Unknown* [2024] EWHC 1277 (KB), Richie J described the court’s task at a review hearing:

“Drawing these authorities together, on a review of an interim injunction against PUs [Persons Unknown] and named Defendants, this Court is not starting *de novo*. The Judges who have previously made the interim injunctions have made findings justifying the interim injunctions. It is not the task of the Court on review to query or undermine those. However, it is vital to understand why they were made, to read and assimilate the findings, to understand the sub-strata of the **quia timet**, the reasons for the fear of unlawful direct action. Then it is necessary to determine, on the evidence, whether anything material has changed. If nothing material has changed, if the risk still exists as before and the claimant remains rightly and justifiably fearful of

unlawful attacks, the extension may be granted so long as procedural and legal rigour has been observed and fulfilled.

33. On the other hand, if material matters have changed, the Court is required to analyse the changes, based on the evidence before it, and in the full light of the past decisions, to determine anew, whether the scope, details and need for the full interim injunction should be altered. To do so, the original thresholds for granting the interim injunction still apply.”

11. I have therefore considered whether, since last year’s injunction orders were made, there has been any material change affecting, diminishing or removing the need for them to be in place.
12. Each application for review is supported by a witness statement by Stuart Wortley, a partner in Eversheds Sutherland (International) LLP, who represent the claimants. He sets out a chronology of incidents and events, occurring both before and since last year’s injunctions.
13. Of the events postdating any or all of the injunctions, Mr Moreshead emphasises several, including the following:-
 - (a) On 19 July 2024, one of the JSO founders, Roger Hallam, was found guilty with others of conspiring to organised protests to block the N25 motorway in November 2022. He was sentenced to five years in prison, later reduced on appeal to four years.
 - (b) On 24 July 2024, ten JSO activists were arrested at Heathrow Airport, seemingly equipped to be able to cut through fences and/or affix themselves to parts of the land or aircraft. Of those individuals, nine were later found guilty by a jury of conspiracy to cause a public nuisance. Five were sentenced to terms in prison of up to 15 months, and four were given suspended sentences.
 - (c) On 27 July 2024 a protest which was due to occur at London City Airport, was relocated to the Department of Transport.
 - (d) On 29 July 2024, eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure.

(e) On 30 July 2024, two JSO activists were arrested at Heathrow Airport after spraying orange paint around the Terminal 5 entrance hall and on destination boards in the departure lounge. Following a criminal trial, the jury was unable to return a verdict.

(f) On 31 July 2024, a protest by JSO and Fossil Free London, was held at the Docklands Light Railway Station, at London City Airport. That being an area excluded from the red line of the injunction.

(g) On 1 August 2024, six JSO activists were blocked access to the departure gates at Heathrow Terminal 5.

(h) On 5 August 2024, five JSO activists were arrested on their way to Manchester Airport and were in possession of bolt cutters, angle grinders, glue, sand and banners reading “oil kills”. Four of these individuals were subsequently found guilty of conspiracy to commit a public nuisance and then sentenced to terms of imprisonment, ranging between 18 and 30 months.

(i) On 21 February 2025, XR held a demonstration at Inverness Airport against climate change.

(j) On 27 May 2025, JSO made an announcement which at least gave the impression that it had now decided to withdraw from mounting disruptive protests of a direct action nature.

(k) However, on 18 May 2025, GB News reported that JSO was considering a “dramatic U-turn” and on 21 May 2025, JSO sent a link to its subscribers with the comment, “GB News was right for once. We are ‘plotting a comeback’.”

(l) On 21 May 2025, London City Airport received intelligence information from the Metropolitan Police of a protest by environmental protest groups, which had been planned at Heathrow Airport, to be held at the Sofitel Hotel on 20 May 2025, where an annual general meeting for Shell was being held and which was within the redline boundary of the injunction obtained by that airport. The protest was relocated to the

Shell head office, “in order to avoid the risk of associated penalties for breaching the injunction.”

(m) Over the weekend of 14 and 15 June 2025, JSO arranged an event described as “Seeds of Rebellion”, which seemingly was part of a training programme – a “summer of resistance training” – where attenders would be taught how “to plan actions that cut through” and to “plant the seeds of the coming non-violent revolution.”

(n) JSO’s fundraising page currently invites donations for – “[A] New campaign [that] is in the works”

14. Mr Wortley’s evidence also mentions activities of other protest groups opposed to the use of fossil fuels including Youth Demand, Extinction Rebellion and Fossil Free London. He refers to disruptive protest activity in 2024 and 2025 by Extinction Rebellion, though not at airports. He also exhibited an email sent by the Metropolitan Police to London City Airport’s security team on 21 May 2025, which referred to the incident relating to the Shell AGM and said:

“...The injunction at [Heathrow Airport] had a real impact on the Shell protest yesterday and builds on your experiences. To remove an injunction now, would open up to further protest. And whilst JSO have stepped down, there appear to be a cycle of new groups emerging and this cannot be ruled out, so maintaining it would be very much recommended.”

15. I accept Mr Moreshead’s submission that that advice from the police is a relevant consideration. Although the announcement by JSO on 21 March 2025 could signal a reduction from the risk of unlawful activity at the airports, there is also clear evidence of a possible U-turn from that announcement. And, as Mr Morshead submits, even if JSO left the scene, it is too early to tell what the effect of that would be, having regard to the possibility of some JSO members continuing to support direct action, and to the continued existence of other protest groups. Nor is it possible to conclude that the risk has been materially reduced or removed by the imprisonment of some JSO activists referred to above.

16. Meanwhile, the substantial, though not total lack of direct action at the airports since the grant of the injunctions is consistent with the injunctions having proved to be an effective deterrent. I accept that removing the injunctions at present would create a real risk of a resumption of activity at airports.
17. When granting the injunctions, the judges last year concluded that enforcement of bylaws and criminal proceedings did not provide an adequate alternative remedy. That, in my view, has not changed.
18. In the circumstances considered as a whole, I conclude that there has been no material change which removes or seriously diminishes the justification or the rationale for the injunctions, and that they should continue in force.
19. Turning to the form of the order, Mr Morshead showed me the decision of Nicklin J in *MBR Acres Limited and Others v John Curtin & Persons Unknown* [2025] EWHC 331 (KB), which took a different approach of directing an injunction in a protest case, “**contra mundum**”, rather than by describing categories of defendants by reference to the conduct to be prohibited, which would also make service of the claim unnecessary. Nicklin J noted that the court must consider what other or better solutions may be available, having regard to enhanced police and local authority powers. He also indicated that orders should include a requirement that the court’s permission be obtained before any application is made to commit for contempt of court.
20. Mr Morshead submitted that it would be better in this case to retain a description of the intended defendants, by reference to the conduct being enjoined, and that that course was followed in a later decision of Soole J in *Chancellor, Masters and Scholars of the University of Cambridge v Persons Unknown* [2025] EWHC 724 (KB). He also submitted that a requirement for consent for committal proceedings should not be necessary, having regard to the safeguards built into the injunction and to the impact which applications for consent could have on costs and court resources.
21. In the present cases, the judges last year found it appropriate to describe or define the defendants by specific reference to the type of conduct to be enjoined. Although Nicklin J has identified a possible different approach, it seems to me that on a review

hearing, I should not change the approach taken by the previous judges, where the underlying circumstances have not materially changed. I am also mindful of the need, emphasised by the Supreme Court in *Wolverhampton* at paragraph 221, for defendants in injunctions to be defined as precisely as possible. It seems to me that that also favours a continuation of the approach taken last year.

22. Nor am I persuaded to depart from what was ordered last year by adopting a standard wording to define or describe the prohibited acts in the four cases before me. The differences in wording have not created any difficulty for me in conducting this review, and any potential defendant who has already become aware of the injunction in respect of any specific airport may already be aware of the existing wording, and that factor militates against a change.
23. I also accept the submission that it is not necessary to insert a provision requiring consent or permission to be obtained for any contempt application in the event of a breach of the injunction. Although such a provision could provide a helpful safeguard in some “**contra mundum**” cases, as described by Nicklin J in *MVR Acres*, in the present cases, no enforcement issue has arisen so far. That is by contrast with *MBR Acres*, where Nicklin J vigorously criticised the conduct of claimants who pursued a committal application, which he described as frivolous and bordering on vexatious. As Mr Morshead said, claimants who choose to commence committal proceedings for trivial breaches do so at their own risk. The courts have repeatedly said that, in cases which do not appear to have been cited to the court in *MBR Acres*, such as *Sectorguard Plc v Diene Plc* [2009] EWHC 2693 (Ch), per Briggs J at paragraph 46. Meanwhile, in the circumstances of the present case, I have no reason to expect that such an issue will arise.
24. It seems to me, by way of confirmation, that the steps taken to publicise the orders last year, remain appropriate and sufficient.
25. I will provide for the next review to take place in one year from now. It will remain open for anyone to apply to vary or discharge the orders before then. The cases will again be listed together upon that occasion, but I see no need to consolidate them.

26. I shall ask counsel to finalise the terms of an order whose effect is that the injunctions granted last year will remain in force. For practical reasons, and in principle, that seems to me preferable to the alternative of granting entirely new injunctions.

Epiq Europe Ltd hereby certify that the above is an accurate and complete record of the proceedings or part thereof.

Lower Ground, 46 Chancery Lane, London WC2A 1JE

Email: civil@epiqglobal.co.uk

This transcript has been approved by the Judge

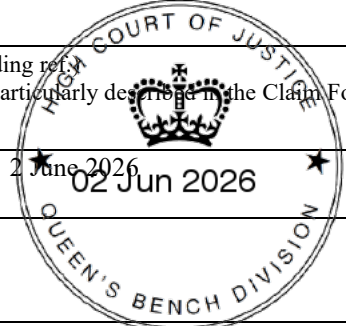
Application notice

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Name of court The High Court of Justice King's Bench Division		Claim no. KB-2024-002317	
Fee account no. (if applicable)		Help with Fees – Ref. no. (if applicable)	
		H W F [] [] []	
Warrant no. (if applicable)			
Claimant's name (including ref.) Leeds Bradford Airport Limited and others			
Defendant's name (including ref.) Persons unknown (as more particularly described in the Claim Form)			
Date		2 June 2026 02 Jun 2026	



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

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

If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?

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

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

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

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

9. Who should be served with this application?

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

N244 Application notice (06.22)

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

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

If necessary, please continue on a separate sheet.

1. The orders of Ritchie J Orders are attached, together with the Bourne J Orders.
2. The Bourne J Orders and the Ritchie J Orders together provide that:
 - a) the injunctions granted pursuant to the Ritchie J Orders are to be reviewed at 12 month intervals; and
 - b) the hearing at which such review is to be considered is to be listed to “*be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.*”
3. The Claims are defined in the Bourne J Orders as the claims in actions KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (“**the Claims**”).
4. The Claimants in the remaining Claims also seek review of the injunctions and have, by Eversheds Sutherland (International) LLP, also made applications of even date to the same effect as this application.
5. The Court is invited to make an order on the papers in the form of the draft order. The Claimants will notify the Defendants of any order made by the Court and the application following the making of the order.

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

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

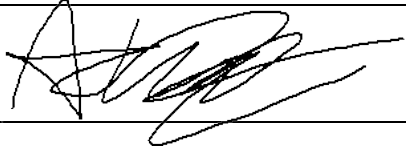
No

Statement of Truth

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

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

Signature



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

Date

Day

2

Month

June

Year

2026

Full name

Alexander James Wright

Name of applicant's legal representative's firm

Eversheds Sutherland (International) LLP

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

Legal Director

Applicant's address to which documents should be sent.

Building and street

Two New Bailey

Second line of address

6 Stanley Street

Town or city

Salford

County (optional)

Postcode

M	3		5	G	X	
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If applicable

Phone number

+44 161 831 8582

Fax phone number

DX number

Your Ref.

292659.000057/WRIGHTAX

Email

alexwright@eversheds-sutherland.com

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BEFORE: MRS JUSTICE STACEY DBE

DATED: 16 JUNE 2026

BETWEEN:-

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



- v -

PERSONS UNKNOWN AS DESCRIBED IN THE CLAIM FORM

Defendants

ORDER

UPON the Claimants' claim by the Claim Form dated 16 July 2024

AND UPON the Claimants' application for an injunction dated 16 July 2024

AND UPON the making of an injunction by order dated 18 July 2024 by Mr Justice Ritchie (as amended) ("**the Orders**")

AND UPON the review hearings in each of the claims KB-2024-001765, KB-2024-002132, KB-2024-002317 and KB-2024-2473 ("**the Claims**") having been listed to be heard together on 24 June 2025 ("**the 2025 Review Hearing**")

AND UPON the Orders dated 24 June 2025 of Bourne J following the hearing of the 2025 Review Hearing in respect of the Claims

AND UPON the Claimants' application dated 2 June 2026 ("**the Application**")

AND UPON the Court making the order without a hearing on the basis a hearing would not be appropriate

IT IS ORDERED THAT:

1. The Orders shall be reviewed at a hearing on 24 June 2026 or a date thereafter as soon as is convenient for the Court, together with the review hearing in claims KB-2024-002132 and KB-2024-002473, with a time estimate of 1 day.
2. The Claimants shall serve the Application and this order on the Defendants by carrying out the steps set out in paragraph 9 of the Orders.
3. A person affected by this order may make an application have to it set aside, varied or stayed within 7 days after the order is served on them.

Wright, Alexander

From: KB Judges Listing Office <KBJudgesListingOffice@Justice.gov.uk>
Sent: 19 June 2026 15:43
To: Wright, Alexander; Owen, Elin; EvershedsCourtClerk; Stuart Wortley - New Mailbox (2026); 'NawaazAllybokus@eversheds-sutherland.com'; a@eversheds.com
Subject: KB-2024-002317 Leeds Bradford Airport Limited and others -v- Unknown and others

Dear all,

In accordance with the Order of Mrs Justice Stracey dated 16th June 2026:

The **Review hearing** of the Injunction Orders made on 24th June 2026 following '*the 2025 Review Hearing*' has been listed for:

30th June 2026 for 1 day before a High Court Judge, in person.

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

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

Kind regards



Subash Vasudevan

Judges Listing Office Team Leader

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Party: Claimants
Name: A Wright
Number: Fifth
Date: 11.06.26
Exhibits: "AJW1 – AJW30"

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

WITNESS STATEMENT OF ALEXANDER JAMES WRIGHT

I **ALEXANDER JAMES WRIGHT** of Two New Bailey, 6 Stanley Street, Salford M3 5GX WILL SAY as follows:

1. INTRODUCTION

- 1.1 I am a Legal Director in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants. I am duly authorised to make this statement on the Claimants' behalf.
- 1.2 Save where otherwise stated, the facts contained in this statement are within my own knowledge and belief and, where they are not, I refer to the source of that information.
- 1.3 The documents to which I shall refer in the course of this statement are to be found in the exhibits marked "**AJW1 – AJW30**".
- 1.4 On 18 July 2024 (amended by the slip rule on 19 July 2024), Mr Justice Ritchie granted injunctions to restrain the Defendants from entering, occupying or remaining on Leeds Bradford Airport, London Luton Airport and Newcastle International Airport until varied, discharged or extended by further order ("**the 2024 Orders**") – copies of which are exhibited at **Exhibit AJW1**.
- 1.5 Paragraph 2 of the 2024 Orders provided for each of those injunctions to be reviewed by the Court periodically at intervals not exceeding 12 months.
- 1.6 The first review hearing was heard on 24 June 2025 ("**the First Review Hearing**") and the injunctions granted pursuant to the 2024 Orders were continued for a further 12 months by

Orders dated 24 June 2025 of Bourne J (“**the 2025 Orders**”) – copies of which are exhibited at **Exhibit AJW2**.

1.7 I make this witness statement for the purposes of the second annual review hearing which has been listed to be heard on 30 June 2026.

1.8 This witness statement supplements:

1.8.1 the witness statement of Vincent John Hodder dated 15 July 2024 made on behalf of the First Claimant (“**the VJ Hodder Statement**”);

1.8.2 the witness statement of Alberto Martin dated 15 July 2024 made on behalf of the Second Claimant (“**the A Martin Statement**”);

1.8.3 the witness statement of Nicholas Jones dated 16 July 2024 made on behalf of the Third and Fourth Claimant (“**the N Jones Statement**”);

1.8.4 my previous witness statements in these proceedings dated 16 July 2024, 17 July 2024, 17 July 2024 and 18 July 2024; and

1.8.5 the witness statements of Stuart Wortley dated 6 June 2025 (“**the First S Wortley Statement**”) and 16 June 2025 (“**the Second S Wortley Statement**”) which were both made on behalf of the Claimants for the purposes of the First Review Hearing (together “**the S Wortley Statements**”).

2. **BACKGROUND**

2.1 The background to these proceedings is more particularly set out in the VJ Hodder Statement, the A Martin Statement, the N Jones Statement and the S Wortley Statements.

2.2 For present purposes it is sufficient to note that the injunctions were sought and obtained:

2.2.1 to protect Leeds Bradford Airport, London Luton Airport and Newcastle International Airport against the threat of direct/unlawful protest activity; and

2.2.2 a number of injunctions were granted in similar terms in respect of various airports across the country between 20 June and 14 August 2024 – such injunctions being:

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

2.3 This firm acted in four out of the seven actions listed above (numbers 1, 2, 4 and 6) (“**the Claims**”). However, our instructions arrived over time rather than all at once, and so multiple hearings were needed, despite the common ground between the different matters.

- 2.4 Although the precise terms of the injunction orders granted in the Claims vary slightly, each of them provides for an annual review.
- 2.5 So as to make better use of the Court's time, the various Claimants in the Claims identified numbers 1, 2, 4 and 6 in the table above in paragraph 2.2 agreed in 2025 to join together and to ask the Court to undertake the first annual review of the injunctions granted in the Claims at the same hearing.
- 2.6 As noted above, Bourne J continued the injunctions for a further 12 months at the First Review Hearing. I exhibit a copy of the judgment of Bourne J from that hearing at **Exhibit AJW3**.
- 2.7 I make this witness statement in support of the second annual review of the injunctions granted pursuant to the 2024 Orders in respect of Leeds Bradford Airport, London Luton Airport and Newcastle International Airport. I will be repeating or adopting much of the content of this witness statement in my statements in support of the annual reviews of the injunctions granted in the other actions.

3. THE 2024 ORDERS AND THE 2025 ORDERS

3.1 The 2025 Orders are substantively on the same terms and provide:

3.1.1 at paragraph 1, that the 2024 Orders "*shall remain in full force and effect, subject to the variations thereto set out in the schedule to this order (and subject to review, as provided for in paragraph 2 of the Ritchie J Order)*"; and

3.1.2 at paragraph 2 for a variation to paragraph 2 of the 2024 Orders.

3.2 The 2024 Orders, as varied by the 2025 Orders, are substantively on the same terms and provide:

3.2.1 for the injunction to take "*immediate effect*" and until "*unless varied, discharged or extended by further order...*"; and

3.2.2 at paragraph 4:

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

3.3 The 2026 review hearing is listed to be heard on 30 June 2026, being a date which complies with the requirements of the 2025 Orders and the 2024 Orders (as varied).

3.4 I will file and serve a further witness statement confirming the steps taken by the Claimants to file and serve the Claimants' evidence and additional documents ahead of the 2026 annual review hearing.

4. SERVICE OF THE 2025 ORDERS

4.1 The 2025 Orders, in so far as they relate to Leeds Bradford Airport, London Luton Airport and Newcastle International Airport, were served in accordance with paragraph 9 of the 2024 Orders by:

4.1.1 a copy of the 2025 Order being uploaded to each of the individual airports' injunction websites. I have been informed by:

4.1.1.1 Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport, that a copy of the relevant 2025 Order was uploaded by a relevant member of staff to the Leeds Bradford Airport injunction website on 30 June 2025;

4.1.1.2 David Norris, Head of Legal for London Luton Airport, that a copy of the relevant 2025 Order was uploaded by a relevant member of staff to the London Luton Airport injunction website on 3 July 2025; and

4.1.1.3 Mark Hunt, Chief Financial Officer for Newcastle International Airport, that a copy of the relevant 2025 Order was uploaded by a relevant member of staff to the Newcastle International Airport injunction website on 30 June 2025.

Printouts from each of the individual airports' injunction websites are exhibited at **Exhibit AJW4**, confirming that a copy of the relevant 2025 Order was uploaded and continues to be available on those websites;

4.1.2 the continuing presence of warning notices at the locations marked with an "X" on the plans to the 2024 Orders (being the plans at **Exhibit AJW5**), which I cover further below at paragraphs 4.4 and 4.5; and

4.1.3 whilst not strictly required under the terms of the 2024 Orders, a copy of the 2025 Orders was affixed at the locations marked with an "X" on the plans to the 2024 Order (being the plans at **Exhibit AJW5**) at London Luton Airport. I have been informed by:

4.1.3.1 David Norris, Head of Legal for London Luton Airport, that a copy of the 2025 Order was so affixed at the relevant locations at London Luton Airport on 1 July 2025; and

4.1.3.2 Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport and Mark Hunt, Chief Financial Officer for Newcastle International Airport, that a copy of the 2025 Order was not so affixed at Leeds Bradford Airport and Newcastle International Airport respectively.

4.2 In addition to the above steps, paragraph 9 of the 2024 Orders required a copy of the 2025 Orders to be served by an email sent to each of the email addresses listed in Schedule 3 to the 2024 Orders. During the course of preparing this witness statement and for the second annual review hearing more generally, I was unable to locate a copy of such an email on this firm's file for these proceedings. I therefore subsequently:

4.2.1 instructed relevant colleagues to carry out a search of our document management system and the email accounts of Stuart Wortley (who had conduct of these proceedings on behalf of the Claimants at the time of the First Review Hearing but who has since left my firm) and Emma Payne (who assisted Mr Wortley at the time and who has also since left my firm) for such an email and have been informed that such an email could not be located; and

4.2.2 spoke with Mr Wortley by telephone on 9 June 2026 to discuss the matter of such an email further. Mr Wortley advised me that he could not readily recall sending such an email and that he would need to consult this firm's file to confirm matters.

4.3 As a consequence, I promptly served the 2025 Orders by email on 9 June 2026, a copy of which is exhibited at **Exhibit AJW6**.

4.4 I am told by Mark Hunt, Chief Financial Officer for Newcastle International Airport that a regime is in place at Newcastle International Airport to ensure that the warning notices remain in place, that replacement warning notices are affixed as and when necessary and that warning notices continue to remain in place at the required locations – in accordance with the terms of the 2024 Orders.

4.5 I am told by Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport and David Norris, Head of Legal for London Luton Airport, that the original warning notices from 2024 were made of metal, so as to ensure their durability and that whilst such a regime as that adopted at Newcastle International Airport is not currently in place at their respective airports:

4.5.1 steps are being taken to confirm the continuing presence of the warning notices at the required locations ahead of the second review hearing; and

4.5.2 such a regime, as that adopted at Newcastle International Airport, will be put in place at their respective airports moving forward if the injunction is continued for a further twelve months at the second annual review hearing.

5. THE AIRPORT BYELAWS AND PLANS

5.1 The injunctions granted in this action and in actions 2 and 6 in the table above were based on the relevant airport byelaws (and therefore extend to all of the land which is subject to the byelaws including land over which the Claimant(s) would not be entitled to legal possession – including for example highways land and areas which are demised to third parties).

5.2 The injunctions in this case currently extend to the land edged red on Plan 1 (Leeds Bradford Airport), Plan 2 (London Luton Airport) and Plan 3 (Newcastle International Airport) to the 2024 Orders – a copy of the relevant plans are exhibited at **Exhibit AJW7**.

5.3 I am informed by Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport and other members of her in-house legal team that:

5.3.1 there have been no changes to the Leeds Bradford Airport Byelaws 2022 and that the Plan attached to the Leeds Bradford Airport Order dated 18 July 2024 (as amended on 19 and 22 July 2024) remains accurate;

5.3.2 third party occupiers within the 'red line' of the injunction order boundary were informed on 9 June 2026 by Kunaal Wharfe, General Counsel for Leeds Bradford Airport that an application has been made to continue the injunction in respect of Leeds Bradford Airport for a further 12 months and that Mr Wharfe has received acknowledgments following that notification from Swissport and Border Force;

5.3.3 as part of the airport's LBA:REGEN project (a £100 million investment to expand the terminal and improve the customer experience through the airport), the First Claimant has granted its contractor a right to use and carry out works over an additional area in the vicinity of the terminal building (in addition to the area referred to in my first witness statement dated 16 July 2024), doing so as the First Claimant's agents pursuant to the Construction (Design and Management) Regulations 2015 and the First Claimant retains exclusive possession and control of this area of land.

5.3.4 it is now the case that:

5.3.4.1 17,000 travelling passengers each day are expected to pass through Leeds Bradford Airport during June, July and August 2026 (previously c.17,200 per day);

5.3.4.2 591 members of staff are now employed directly by the First Claimant (up from 515); and

5.3.4.3 8 airlines serve the leisure and business market from Leeds Bradford Airport rather than 10.

5.4 I am informed by Mark Hunt, Chief Financial Officer for Newcastle International Airport that:

5.4.1 there have been no changes to the Newcastle International Airport Byelaws 2021 and that the Plan attached to the Newcastle International Airport Order dated 18 July 2024 remains accurate; and

5.4.2 third party occupiers within the 'red line' of the injunction order boundary were informed by him on 1 June 2026 that an application has been made to continue the injunction in respect of Newcastle International Airport for a further 12 months - Mr Hunt has informed me that no responses have been received following that notification;

5.4.3 it is now the case that:

- 5.4.3.1 between 18,000 and 24,000 travelling passengers per day are anticipated to pass through Newcastle International Airport during June, July and August 2026 (up from c.15,000 – c.21,000);
- 5.4.3.2 c.650 members of staff are now employed directly by the Third Claimant (up from c.500); and
- 5.4.3.3 15 commercial airlines operate from Newcastle International Airport rather than 16.

5.5 I am informed by David Norris, Head of Legal at London Luton Airport and other members of his in-house legal team that:

5.5.1 the London Luton Airport Byelaws 2005 have been replaced with the London Luton Airport Byelaws 2025 – a copy of which is exhibited at **Exhibit AJW8** and that the extent of the land over which the London Luton Airport Byelaws 2025 apply differs from that over which the London Luton Airport Byelaws 2005 apply. I address the London Luton Airport Byelaws 2025 more fully in the next section immediately below.

5.5.2 key third party occupiers within the ‘red line’ of the injunction order boundary were informed on 9 June 2026 by email that an application has been made to continue the injunction in respect of London Luton Airport for a further 12 months and that steps are being taken to notify the remaining occupiers ahead of the second annual review hearing - Mr Norris has informed me that no responses have been received following that notification.

5.5.3 it is now the case that:

5.5.3.1 over 17 million passengers travelled through London Luton Airport in 2025 and over 18 million are expected to travel through it in 2026 (up from 16 million);

5.5.3.2 passenger numbers average c.47,000 per day, with highs now in excess of c.60,000 (up from c.45,000 and highs of up to c.60,000);

5.5.3.3 c.1,090 members of staff are now employed directly by the Second Claimant (up from c.950);

5.5.3.4 10 airlines now operate from London Luton Airport (up from 8);

5.5.3.5 daily revenue ranges from c.£670,000 to c.£1,146,000 (up from c.£450,000 to c.£850,000);

5.5.3.6 the Second Claimant’s acquisition of the leasehold interest, by way of a transfer dated 29 February 2024, referred to in my first witness statement dated 16 July 2024 (at paragraph 10), has been registered at HM Land Registry under title number BD230068. A copy of the relevant registered title is exhibited at **Exhibit AJW9**; and

5.5.3.7 London Luton Airport is now the subject of a Development Consent Order (“**the DCO**”), to expand the airport to 32 million passengers per annum – the A Martin Statement referred to the application for the DCO.

6. THE LONDON LUTON AIRPORT BYELAWS 2025

6.1 A comparison of the London Luton Airport Byelaws 2005 and the London Luton Airport Byelaws 2025 has been undertaken and I attach as an Appendix to this witness statement a table detailing the relevant provision(s) in the London Luton Airport Byelaws 2025 as against the equivalent provision(s) from the London Luton Airport Byelaws 2005 as referred to in the A Martin Statement.

6.2 In addition to the above provisions, the following provisions of the London Luton Airport Byelaws 2025 are considered relevant and applicable and I therefore draw attention to them:

London Luton Airport Byelaws 2025	
4.1	<i>No person, without Permission, shall enter, or attempt to enter, an Airside location other than through an Airside Entrance Point (except if such entry occurs whilst being carried on board an Aircraft landing at the Airport)</i>
4.2	<i>No person, without Permission, shall exit, or attempt to exit, an Airside location other than through an Airside Exit Point (except if such exit occurs whilst being carried on board an Aircraft taking off from the Airport).</i>
4.4	<i>No person, without Permission, shall enter or remain in an Airside location other than for a reasonable and proper purpose.</i>
5.2	<i>No person (other than an Exempt Person) shall enter, remain or work in any Airside location, unless:</i> <i>5.2.1 that person holds an Identity Pass which permits that person access to the relevant Airside location, or</i> <i>5.2.2 that person is escorted at all times by another person with an Identity Pass that permits that other person access to the relevant Airside location.</i>
7.1	<i>No person, without Permission, shall deface (whether by graffiti or otherwise) or damage any Airport Infrastructure, Airport Equipment, item, or any other property (including buildings, structures, fixtures, fittings, services, cables, pipes, drains and other conduits), equipment, machinery, tools or Vehicles which are owned by another person (other than with the consent of that owner).</i>
8.4	<i>No person, without Permission, shall behave in such a way so as to endanger themselves or any other person.</i>
8.5	<i>No person, without Permission, shall walk on any part of the Airport which is not designated by LLA for pedestrian use (including any road other than in the proper course of using a pedestrian crossing point marked for that purpose).</i>
8.8	<i>No person, without Permission, shall organise or take part in any public assembly, protest, demonstration or procession.</i>

6.3 The extent of the land over which the London Luton Airport Byelaws 2025 apply differs from that over which the London Luton Airport Byelaws 2005 apply. My colleague, Elin Owen, has overlaid the two plans and prepared the plan exhibited at **Exhibit AJW10** using the Orbital Witness platform to show the extent of the differences between them, which shows that:

- 6.3.1 three discrete areas are covered by the London Luton Airport Byelaws 2025 but not the London Luton Airport Byelaws 2005 ("**the LTN 2025 Areas**") shown on the plan at **Exhibit AJW10** shaded in purple; and
- 6.3.2 one discrete area is covered by the London Luton Airport Byelaws 2005 but not the London Luton Airport Byelaws 2025 ("**the LTN 2005 Area**") shown on the plan at **Exhibit AJW10** shaded in red.

6.4 In respect of the LTN 2025 Areas, I can confirm that:

- 6.4.1 the land making up the area shaded purple and marked 'Area 1' on the plan at **Exhibit AJW10** is:
 - 6.4.1.1 let by the Second Claimant for a term of 21 years beginning on and including 7 February 2014 and ending on and including 6 February 2035. This lease is registered at HM Land Registry under title

number HD544934 and a copy of the applicable registered title and title plan is exhibited at **Exhibit AJW11**;

- 6.4.1.2 land on which the majority of London Luton Airport's landing lights, but not all, are located and which is not fenced off (i.e. this location is an open field), presenting practical difficulties for demarcation of the applicable boundary 'on the ground';
- 6.4.1.3 not land in respect of which the Second Claimant proposes to seek an amendment to the current London Luton Airport injunction plan – on the basis that (a) the physical footings of all airport landing lights are currently protected by and within the scope of the London Luton injunction; and (b) such protection is considered appropriate and sufficient.
- 6.4.2 I have been advised by David Norris, Head of Legal at London Luton Airport, that the land making up the area shaded purple and marked 'Area 2' on the plan at **Exhibit AJW10** is erroneously included within the scope of the London Luton Airport Byelaws 2025 and that steps are being taken to revise the plan appended to them to correct this. The Second Claimant therefore does not propose to seek an amendment to the current London Luton Airport injunction plan in respect of this area of land.
- 6.4.3 the land making up the area shaded purple and marked 'Area 3' on the plan at **Exhibit AJW10** is owned by the Second Claimant. The Second Claimant owns the freehold interest in this area of land, which is registered at HM Land Registry under title number BD146644 and a copy of the applicable registered title and title plan is exhibited at **Exhibit AJW12**. This area of land is used by the airport's car park operator (APCOA) to store cars using the airport's priority meet and greet service. I have been advised by David Norris, Head of Legal at London Luton Airport, that this area of land can only be accessed by passing through the wider airport estate. So as to ensure comprehensive protection for London Luton Airport and avoid an otherwise 'gap' within it which could potentially be exploited in the future, the Second Claimant proposes to seek an amendment to the current London Luton Airport injunction plan to include this area of land.
- 6.5 Noting the above, the Claimants will seek to re-amend the Claim Form by replacing plans 2, 2A and 2B with new plans, which at the date of this statement are anticipated to be in the form of those exhibited at **Exhibit AJW13**. The form of order the Claimants will seek will therefore include an amendment to the 2024 Orders.
- 6.6 The Claimants will also seek to re-amend paragraph 14 of the amended Particulars of Claim so as to refer to the provision in paragraph 8.8 of the London Luton Airport Byelaws 2025 and to otherwise update the amended Particulars of Claim so as reflect the terms of the London Luton Airport Byelaws 2025 more generally.
- 6.7 A formal application to make such re-amendment(s) will be made by the Claimants alongside or shortly following the filing/service of this witness statement.

7. **HEALTH AND SAFETY RISK / RISK OF HARM**

- 7.1 The health and safety risks and risks of harm presented by direct/unlawful protest activity at the airports in question are detailed in the VJ Hodder Statement, the A Martin Statement and the N Jones Statement. By way of summary, however, these include but are not limited to:
 - 7.1.1 the Claimants' ability, at their respective airports, to ensure:
 - 7.1.1.1 the safe operation of aircraft;
 - 7.1.1.2 the safe movement of vehicles and persons on the runways / taxiways and other operational areas, to avoid collisions and damage to aircraft;
 - 7.1.1.3 the ability of firefighting and rescue services to respond to incidents or accidents with the necessary urgency;

- 7.1.2 the inevitable delays or cancellations to scheduled flight arrivals and departures that direct/unlawful protest activity would bring, resulting in inevitable financial harm, operational disruption, and more general disruption and delay to members of the public;
- 7.1.3 the diversion of the Claimants' and wider public resources (e.g. police resources), which would be diverted as a matter of urgency into responding to any emergency caused by direct/unlawful protest activity; and
- 7.1.4 impacting counter-terrorism and police operations at the respective airports.
- 7.2 I understand from Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport, David Norris, Head of Legal for London Luton Airport and Mark Hunt, Chief Financial Officer for Newcastle International Airport that the potential implications for counter-terrorism operations at their respective airports is of particular concern in the light of the recent raising of the terrorism threat level in the UK by the Joint Terrorism Analysis Centre, on 30 April 2026, from 'substantial' to 'severe' – meaning that "*an attack is highly likely*". The raising of this threat level is evidenced by the printout taken from MI5's website ([Threat Levels | MI5 - The Security Service](#)) which is exhibited at **Exhibit AJW14**.
- 7.3 In relation to such potential implications for counter-terrorism operations, I would draw attention to:
- 7.3.1 the previous evidence of Vincent John Hodder, Chief Executive Officer of Leeds Bradford Airport, in these proceedings as set out at paragraph 58 in the VJ Hodder Statement:
- "58. All airports are a potential target for terrorist activity (which explains why the airport is routinely patrolled by police carrying firearms) meaning:-*
- 58.1 there is heightened security and any activity which is out of the normal is particularly dangerous. Any protest activity could be interpreted (whether correctly or not) by the security services at airports as a potential threat, meaning that the police or security services may intervene with significant knock-on effects. If the protestors pose no security or counter-terrorism threat, that would be a distraction for the police and our security team and a diversion of resources which are necessary for the counter-terrorism work they carry out to keep members of the public safe; and*
- 58.2 there is also always the potential that the protests are, or turn, violent or are, in fact, used as cover for actual terrorist attacks".*
- 7.3.2 the following comments of Ritchie J in his judgment in *Leeds Bradford Airport Ltd & Ors v Persons Unknown* [2024] EWHC 2274 (KB) (being his judgment from the hearing at which the 2024 Orders in these proceedings were granted) at [30-31]:
- "30. Secondly, I need to look at the institutions which are bringing these applications. Airports are a part of the national infrastructure which are acutely sensitive to terrorist threats and are highly regulated in relation to safety, maintenance and security. They are also complicated organisations, involving the movement of thousands of members of the public, close to highly combustible materials and within fast-moving, huge pieces of equipment. Such organisations are acutely sensitive to chaotic disruption caused by unlawful direct action.*
- 31. I also take into account the fear, which I think is justified, of the Chief Executive Officers, that terrorism is facilitated by chaos..."*
- 7.3.3 the recent incident at Southend Airport, referred to further below at paragraph 14.2, which demonstrates, in my view, the heightened security concerns that there are at airports and how the activities of those at them can be interpreted by airport security services as a possible protest action, giving rise to a potential security threat – necessitating the need for energy and resources to be diverted in order to address them.

8. **CONTINUING THREAT: PROTESTS TARGETING THE OIL & GAS SECTOR – POST 2025 REVIEW HEARING**

8.1 I am informed by Claire Acklam (Senior Legal Counsel for Leeds Bradford Airport), David Norris (Head of Legal at London Luton Airport) and Mark Hunt (Chief Financial Officer for Newcastle International Airport) respectively that there have been no incidents of protests (lawful or otherwise) at Leeds Bradford Airport, London Luton Airport or Newcastle International Airport since the 2025 Review Hearing.

8.2 I exhibit at **Exhibit AJW15** a chronology of protest incidents since the 2025 Review Hearing which have targeted the oil and gas sector and organisations perceived to support or facilitate it ("**the Chronology**"), together with a printout of the relevant websites referenced within it for each incident – the source of which are noted in the Chronology. I would draw particular attention to:

Date	Location	Brief Details
03 July 2025	London	Extinction Rebellion supporters blockaded the entrance to the Energy Insurance London Conference.
05 July 2025	UK Wide	'Insure our Survival' Campaign: a seven-day environmental / anti-fossil fuels protest as part of Extinction Rebellion's Summer of Action.
05 July 2025	London Oxford Airport	Extinction Rebellion supporters marched to the airport to draw attention to the number of private jets carrying what were asserted to be ultra-wealthy passengers.
07 July 2025	Various, UK	Members of Extinction Rebellion protested outside of different branches of insurance brokers, Marsh, as part of the national day of action against insurance businesses.
09 July 2025	Inverness Airport	Protestors led by Extinction Rebellion Scotland protested outside the terminal to campaign against private jet company Blackbird Air.
09 July 2025	London	Extinction Rebellion supporters disrupted the British Insurance Awards by blocking the red carpet. Two activists were detained after getting into the venue and planning to take to the stage to drop a banner.
11 July 2025	Shrewsbury	Extinction Rebellion supporters targeted the offices of Marsh and Howden in an insurance-related protest relating to fossil fuels with protestors calling for the support of new projects to be ended.
16 July 2025	London	Extinction Rebellion supporters targeted AIG as part of the Insure Our Survival campaign.
21 July 2025	Reading	Two banners appeared above the A329 motorway reading "Your Planet Needs You" and "Tax The Rich". Extinction Rebellion claimed responsibility.
21 July 2025	Oxford	Extinction Rebellion supporters staged a 'crime scene' at Barclays, protesting about the bank financing the fossil fuel industry.
23 July 2025	London	Five Extinction Rebellion protestors dressed as scientists and occupied the lobby of Prudential Regulation Authority demanding capital requirements on fossil fuels in the insurance and banking sectors.
26 July 2025	Edinburgh	Ten Greenpeace activists arrested after suspending themselves from a bridge outside Edinburgh. They dangled themselves 25m above the water line, stopping a tanker delivering for 24 hours.

28 July 2025	London	Fossil Free London activists dressed as robbers emblazoned with the Norwegian flag staged a "heist" at the Bank of England to highlight the "daylight robbery" that approval of the application for exploitation of the Rosebank oil field would entail.
22 August 2025	UK Wide	"Shut The System" announced that it is embarking on a "Summer of Sabotage" targeting businesses it considers to be the largest contributors to climate destruction.
05 September 2025	London	Three climate protestors from Climate Resistance were carried out after disrupting the Reform UK party conference.
08 September 2025	London	Extinction Rebellion announce its 'Insure Our Survival' campaign, set to run from 8-22 September with large-scale demonstrations planned, targeting companies that are enabling fossil fuel projects.
09 September 2025	London	Extinction Rebellion protestors staged protests at the London offices of AXA and AIG, blocking access to the buildings.
15 September 2025	Reading	Extinction Rebellion activists held a "die-in" at Barclays Bank in Reading, where protestors lay on the ground to simulate death, to link the funding of fossil fuels projects with climate change and global deaths.
16 September 2025	Ipswich	Extinction Rebellion activists took part in a global demonstration against large insurance companies calling on the companies to stop funding fossil fuels.
18 September 2025	Stansted Airport	Two young people who spray-painted two private jets at Stansted Airport in June 2024 were found guilty of criminal damage at Chelmsford Crown Court. They had cut through the wire perimeter fence and sprayed paint onto two private jets as part of a Just Stop Oil protest, to demand the UK government to negotiate a treaty to phase out oil and gas by 2030.
22 September 2025	Glasgow	Extinction Rebellion held a protest outside of AXA's office accusing it of "keeping killers safe" by insuring or investing in, amongst other things, fossil fuel projects.
05 November 2025	London	Fossil Free London campaigners disrupted BP panel event at Simmons & Simmons LLP.
04 December 2025	London	Fossil Free London campaigners disrupted Oil Executive awards dinner in London with attendees including Shell, BP and Ithica Energy.
15 January 2026	London / Manchester	Environmental and humanitarian protestors rallied at Zurich offices demanding it drops contracts with Shell, Chevron, Maersk and General Dynamics.
19 January 2026	London	Extinction Rebellion staged a protest outside Macquarie Group Headquarters to protest against expansion at Farnborough Airport. Two activists occupied the entrance to the building unfurling a banner that calls for a ban on private jets and urged the investment firm to sever its connection to fossil fuels.
05 May 2026	London	Activists from Fossil Free London staged a protest outside Equinor's offices, piling life-sized body bags outside the building while one campaigner dressed as an oil executive stood on top of them.
06 May 2026	York	Protestors, claiming to be associated with Boycott Bloody Insurance, protested outside Aviva's boardroom in York whilst they had their AGM.

06 May 2026	London	Fossil Free London protested outside Shell HQ ahead of quarterly profits which are due to be announced on 7 May 2026.
07 May 2026	London	Climate activists disrupted Barclays shareholder meeting.

8.3 The incidents set out above and in the Chronology demonstrate that there continues to be a strong and active protest movement against the fossil fuel industry and associated sectors/industries more broadly which shows no signs of abating.

9. ENVIRONMENTAL / CLIMATE CAMPAIGN GROUPS

9.1 Just Stop Oil (JSO)

9.1.1 The S Wortley Statements, made on behalf of the Claimants for the purposes of the First Review Hearing, explained that:

9.1.1.1 JSO had announced on 27 March 2025 that it was “*hanging up the hi vis*” and that it was, in short, ceasing its activities; and

9.1.1.2 contradictory statements were subsequently made on behalf of and/or by JSO which suggested that the Just Stop Oil campaign was a continuing campaign notwithstanding the above announcement.

9.1.2 I note that:

9.1.2.1 the JSO website:

(a) states at various points that “*Just Stop Oil ended its street campaign in 2025*” and/or “*In 2024 Just Stop Oil successfully won its original demand of ‘no new oil and gas’ and on March 27th 2025 announced an end to the campaign of action. However, our supporters will continue to tell the truth in court, to speak out for our political prisoners and to help build what comes next*” – relevant screenshots, taken by my colleague Meghan Clifford on 3 June 2026, are exhibited at **Exhibit AJW16**;

(b) states on its homepage, directly above a link to the campaign group Take Back Power’s website (a campaign group which I cover further below at paragraph 9.2), that:

“*!! New project alert !!*”

The rich are killing us. To stop them and fix our broken country we need to...

Take back POWER”

A screenshot, taken by my colleague Meghan Clifford on 3 June 2026, showing this is exhibited at **Exhibit AJW17**.

(c) further states on its homepage that:

“Just Stop Oil launched in 2022, demanding the UK Government stop licensing all new oil, gas and coal projects. In 2024 the UK government met our original demand. Civil resistance works.

But revolutionary change is needed now more than ever. Corrupt politicians are serving the interests of billionaires. Ordinary people are struggling to survive, and the media is shifting blame from their mates on mega yachts to the people in small boats. Meanwhile, the world is getting hotter and hotter. Nothing short of a political and economic revolution is going to get us out of this mess.

*It's time to **Take Back Power***

A screenshot, taken by my colleague Meghan Clifford on 3 June 2026, showing this is exhibited at **Exhibit AJW18**.

9.1.2.2 I am not aware of any incidents involving direct/unlawful protest activity attributable to JSO since the 2025 Review Hearing; and

9.1.2.3 notwithstanding the above, the JSO website and affiliated social media channels (including Instagram, Facebook and Twitter) appear to remain active – as evidenced by the printouts, taken by my colleague Meghan Clifford on 3 June 2026, exhibited at **Exhibit AJW19**.

9.1.3 Noting the reference on the JSO homepage and link to the Take Back Power website, it strongly appears to me that Take Back Power is a successor to JSO and I refer also to an article in the Guardian newspaper from 25 April 2025, a copy of which is exhibited at **Exhibit AJW20**, which states:

“Many of those involved with [Take Back Power] are seasoned activists – despite being in their early 20s – having taking part in actions with Extinction Rebellion, Just Stop Oil, Animal Rising and other groups in recent years”.

9.2 Take Back Power

9.2.1 I became aware of the group in or around December 2025 when activists threw custard and apple crumble at a case containing the crown jewels at the Tower of London (an article, taken by my colleague Meghan Clifford on 3 June 2026, from Take Back Power’s website on this incident is exhibited at **Exhibit AJW21**).

9.2.2 Take Back Power describes itself on its homepage as “a nonviolent civil resistance group in the UK. We aim to put the 99% in charge through citizen’s assemblies. We are ordinary people from all walks of life who believe that in order to fix Britain, we have to tax the rich. And we don’t think the rich should get a veto. We want the people to decide how we tax the rich through a legally-binding citizen’s assembly – a House of the People. It’s time for the 99% to have 99% of a say!” (a printout of Take Back Power’s website, taken by my colleague Meghan Clifford on 3 June 2026, is exhibited at **Exhibit AJW22**).

9.2.3 I note that there is an ‘about us’ section on Take Back Power’s website which states:

“What is Take Back Power?”

Take Back Power is a nonviolent civil resistance group in the UK. We aim to put the 99% in charge through citizen’s assemblies. We are ordinary people from all walks of life who believe that in order to fix Britain, taxing the rich is an essential first step, and we want ordinary people to decide how.

Why does Take Back Power engage in disruptive direct action?

Nobody likes disruption, least of all the people disrupting, however history shows us that disruption is a necessary part of social change. Disruptive direct action brought us livable working conditions, the weekend, universal suffrage, and civil rights for marginalised communities. More recently, it saw the demand of Just Stop Oil become government policy. The evidence is clear that though people may not like the messenger, or the method of delivery, they hear the message. Ultimately this leads to political pressure and eventual social change...”.

Relevant printouts, taken by my colleague Meghan Clifford on 3 June 2026, are exhibited at **Exhibit AJW23**.

9.2.4 Take Back Power’s website details a number of incidents involving their activists/supporters since December 2025:

3 December 2025	Activists entered the lobby of The Ritz and dumped large piles of horse manure beneath the hotel's 25-foot Christmas tree.
6 December 2025	Activists threw custard and apple crumble at a case containing the crown jewels at the Tower of London
6 February 2026	Two activists locked themselves in front of Carriage Gate, blocking access to Parliament
5 March 2026	Fifteen Take Back Power activists were arrested by the police on suspicion of conspiracy to commit theft.
14 March 2026	Take Back Power activists took various food items, without paying, from supermarkets across four UK cities: Manchester, London, Exeter and Truro
19 April 2026	Seven Take Back Power activists were arrested by the police on suspicion of conspiracy to commit theft.
27 April 2026	Take Back Power activists staged a protest at Sotheby's auction house.
30 April 2026	Take Back Power activists occupied a Ferrari dealership in Berkeley
1 May 2026	Take Back Power activists: <ul style="list-style-type: none"> • took various food items, without paying, from a supermarket in Brixton; • occupied the luxury department store Liberty; and • disrupted access to the luxury hotel, Claridge's.

Printouts, taken by my colleague Meghan Clifford on 3 June 2026, from the Take Back Power website covering the above incidents are exhibited at **Exhibit AJW24**.

9.2.5 A clear target of the Take Back Power group is the 'super-rich'. This gives rise to particular concern for the Claimants and the subject airports because:

9.2.5.1 there are private jet facilities at all of the subject airports and indeed at all of the airports which are the subject of the Claims;

9.2.5.2 the 'super-rich' are users, if not perceived users, of such facilities;

9.2.5.3 JSO and Extinction Rebellion activists have previously targeted private jet facilities at airports. I refer to:

(a) the incidents referred to in the table above at paragraph 8.2 on:

- (1) 5 July 2025: Extinction Rebellion supporters marched to London Oxford Airport to draw attention to the number of private jets carrying ultra-wealthy passengers;
- (2) 9 July 2025: Protestors led by Extinction Rebellion Scotland protested outside the terminal to campaign against private jet company Blackbird Air; and
- (3) 19 January 2026: Extinction Rebellion staged a protest outside Macquarie Group Headquarters to protest against expansion at Farnborough Airport. Two activists occupied the entrance to the building unfurling a banner that calls for a ban on private jets and urged the investment firm to sever its connection to fossil fuels.

(b) the previous incident at Stansted Airport, on 20 June 2024, which involved two Just Stop Oil activists unlawfully gaining entry to the airport and spray-painting two private jets – for which those involved were found guilty of criminal damage at Chelmsford Crown Court in September 2025, receiving (a) a five month custodial sentence suspended for twelve months; and (b) a six week custodial sentence suspended for eight months plus 20 days rehabilitative activity. It was reported that this necessitated extensive professional cleaning, at a cost of c.£12,000 (a copy of relevant articles taken from JSO's website, printed out by my colleague

Meghan Clifford on 3 June 2026, are exhibited at **Exhibit AJW25**); and

9.2.5.4 Take Back Power has a clear and evidenced history for taking direct action.

9.2.6 I am instructed that the Claimants are accordingly very concerned that their airports will become the focus of direct action by members of Take Back Power, given the presence of private jet facilities at their respective airports, in the absence of the continuation of the protection afforded by the injunction.

9.3 Extinction Rebellion

9.3.1 Extinction Rebellion remains an active organisation both in the UK and internationally, as evidenced by the incidents detailed in the Chronology, and one which, noting the concerns set out immediately above, has directly targeted action against private jet facilities in the period since the 2025 Review Hearing.

9.4 Fossil Free London

9.4.1 Fossil Free London's website (fossilfreelondon.org) describes the protest group as "*a climate justice organisation dedicated to disrupting the fossil fuel industry here in our city. Through direct action, strategic campaigning, and movement building, we challenge the social licence of elites and corporate polluters*". A screenshot, taken by my colleague Meghan Clifford on 3 June 2026, showing this page is attached at **Exhibit AJW26**.

9.4.2 Fossil Free London has carried out a number of protests in the period since the 2025 Review Hearing, as evidenced by the Chronology.

9.5 Youth Demand

9.5.1 Youth Demand is the junior branch of JSO (formerly known as Youth Climate Swarm). I note that their website, like JSO's website, directs visitors to Take Back Power's website. A printout, taken by my colleague Meghan Clifford on 3 June 2026, from Youth Demand's website is exhibited at **Exhibit AJW27**.

9.6 Whilst the JSO announcement in March 2025 and the apparent lack of protest action directly attributable to this group since the 2025 Review Hearing may indicate that the JSO campaign is no longer active, it appears, from the evidence above, that its members have very likely migrated to Take Back Power or other organisations.

9.7 Though the names and tactics may change and evolve over time, possibly in an attempt to exploit potential loopholes in unlawful protest injunction orders, for a number of the activists the primary objective remains disruptive demonstrations against organisations that they believe stand opposed to their demands, which includes those perceived to be facilitating and/or supporting the fossil fuel industry. That this is the case is demonstrated, in my view, by the evidenced links between Just Stop Oil, Extinction Rebellion and Youth Demand with Take Back Power and the involvement of members of these groups with it. Consequently, there remains a continued risk to the Claimants' airports that they will be the target of direct action in the absence of the protection afforded by the injunctions.

10. **OTHER AIRPORT INJUNCTION PROCEEDINGS**

10.1 I am aware from checking their respective publicly accessible websites that the injunctions granted in 2024 in respect of those airports not covered by the Claims, referred to at paragraph 2.2.2 above, were continued at their first annual review hearing in 2025 - respectively:

	Airport(s)	Action Number	Judge / Date of Order
3	Heathrow Airport	KB-2024-002210	Mr Justice Turner 23 July 2025
5	Gatwick Airport	KB-2024-002336	Mr Duncan Atkinson KC (Sitting as a Deputy Judge in the High Court) 18 July 2025
7	Southend Airport	KB-2024-002596	His Honour Judge Freedman (Sitting as a Judge of the High Court) 22 October 2025

10.2 I am aware, from reviewing its publicly accessible website, that the second annual review hearing of the injunction granted in respect of Southend Airport and Heathrow Airport have been listed to be heard on 2 July 2026 and 9 July 2026 respectively. I do not know what the position is in respect of Gatwick Airport.

11. **WIDER INJUNCTION PROCEEDINGS**

11.1 I am aware from this firm’s involvement in the matters or from checking the relevant publicly accessible websites of the following injunctions that have been granted more broadly to protect against the threat of unlawful environmental based protests:

Claim Number	Property	Claimant(s)	Duration of Injunction
QB-2022-001259	Shell Centre Tower	Shell International Petroleum Company Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review. At the most recent review hearing on 17 October 2025 the Court continued the injunction.
QB-2022-001241	Shell Haven Site	Shell UK Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review. At the most recent review hearing on 17 October 2025 the Court continued the injunction.
QB-2022-001420	Petrol filling stations	Shell UK Oil Products Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review.

			At the most recent review hearing on 17 October 2025 the Court continued the injunction.
PT-2022-000303	Buncefield Oil Terminal and the Kingsbury Oil Terminal	United Kingdom Oil Pipelines Limited and West London Pipeline and Storage Limited	Final injunction granted until 20 October 2028 subject to annual review. At the most recent review hearing on 13 November 2025 the Court continued the injunction.
QB-2022-000904	Pembroke oil refinery and jetties, Manchester oil terminal, Kingsbury oil terminal, Plymouth oil terminal, Cardiff terminal, Avonmouth terminal and Pembrokeshire terminal	Valero Energy Ltd, Valero Logistics UK Ltd and Valero Pembrokeshire Oil Terminal Ltd	Final injunction granted until 13 December 2028 or further order in the meantime following a hearing on 17 January 2024. At the most recent review hearing on 16 February 2026, the Court continued the injunction.
QB-2022-001098	Fawley Complex, Hythe Terminal, Avonmouth Terminal, Birmingham Terminal, Purfleet Terminal, West London Terminal, Hartland Park Logistics Hub and Alton compound at Holybourne	Esso Petroleum Company Limited and Exxonmobil Chemical Limited	Final injunction granted on 29 January 2024 until 11 July 2028 subject to annual review on 18 July of each year. At the most recent review hearing on 9 July 2025 the Court continued the injunction. A further review hearing has been listed to be heard on 22 July 2026.

12. DETERRENT EFFECT OF THE INJUNCTIONS

- 12.1 The Claimants continue to have no objection to protests which are lawful and do not interfere with others' rights subject to those wishing to carry out a peaceful protest at the airports, making a request for the Claimants to designate an area for that purpose in accordance with the final recital in the 2024 Orders. In asking the Court to continue the injunctions granted by the 2024 Orders, the Claimants seek only to restrain direct/unlawful protest activity that goes beyond that which is peaceful and lawful and causes disruption to those seeking to go about their lawful business at the airports in question.
- 12.2 Noting the continued lack of direct/unlawful protest activity at the airports in question, alongside the incidents referred to within the Chronology, the Claimants infer that the protestors involved in these incidents (or some of them at least) have been careful to ensure that their unlawful behaviour has taken place at premises which are not protected by injunctions so that they are not at risk of proceedings for contempt of court. I would also draw attention to:

12.2.1 the following comments of Swift J in his judgment in *Exolum Pipeline System Limited & Others v Persons Unknown & Another* [2025] EWHC 1913 (KB) at [14]:

"14. The continuation of the Order made by Bennathan J has become necessary as orders of this type have themselves become features of what appear to be contests of attrition between activist organisations, such as Just Stop Oil, and any event or operation that those activists consider will, if disrupted, obtain publicity for and advance their cause. The attacks that Just Stop Oil undertakes are essentially opportunistic. As one or other target is made less accessible by orders such as the one now under consideration, activists will turn their attention somewhere else. The application to continue the Order made in 2022 rests on the premise that were this order to be discharged these terminals would once again be targeted and, having previously been the subject of an injunction, those terminals would be all the more an attractive target. Experience shows that such pessimism is warranted. I fear that, once made, the need for orders such as this one can almost become self-perpetuating, in that any decision to remove the order would, from the point of view of the activists, wave a flag above these terminals marking their return to the category of targets for disruption. Even though Just Stop Oil and other likeminded organisations may be opportunistic, experience shows that they are also persistent and will take any opportunity that presents itself".

12.2.2 paragraphs 20 and 31-32 of the First S Wortley Statement:

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

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

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

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

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

12.3 The deterrent effect of injunction orders, such as those granted in these proceedings, is further evidenced I would respectfully suggest by the apparent willingness of those engaged in unlawful direct protest action to 'take their chances' of not being convicted in any subsequent criminal proceedings arising from such action where there is no protective injunction order in place. Whilst I acknowledge that criminal convictions do sometimes follow in such circumstances there are many instances of that not being the case – by way of example, I am aware that:

12.3.1 the jury at the initial trial of two JSO activists in January 2025, who sprayed departure boards at Heathrow Airport with orange paint in July 2024, failed to reach a majority decision. They were subsequently found guilty of criminal damage at a retrial in June 2026; and

- 12.3.2 three JSO activists were found not guilty of causing a public nuisance in October 2025 by a jury for spraying Stonehenge with orange powder in 2024;
- 12.3.3 three JSO activists were found not guilty of causing a public nuisance in September 2025 after climbing gantries on the M25 in 2022;
- 12.3.4 eight JSO activists were found not guilty of intentionally or recklessly causing a public nuisance in August 2025 after blocking entrances to petrol stations in August 2022;
- 12.3.5 the jury at the initial trial of a JSO supporter in July 2025, who climbed a gantry on the M25 in November 2022, failed to reach a majority decision; and
- 12.3.6 five Palestine Action activists were cleared in February 2026 of aggravated burglary after Elbit Systems' (a UK subsidiary of an Israeli defence firm) was targeted on 6 August 2024. They were also charged with criminal damage and violent disorder but the jury reached partial or no verdicts on those counts. Four of the activists were subsequently found guilty of criminal damage at a retrial in May 2026.

Copies of news articles reporting on the above are exhibited at **Exhibit AJW28**.

13. **RESPONSE TO THE CLAIMS**

- 13.1 I can confirm that no acknowledgment of service, admission or defence has been received on behalf of the Defendants and that nobody has ever engaged with these proceedings.
- 13.2 I am informed by Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport, David Norris, Head of Legal for London Luton Airport and Mark Hunt, Chief Financial Officer for Newcastle International Airport that the Claimants are not aware of the identity of any individuals who threaten to engage in direct/unlawful protest activity at their respective airports.
- 13.3 In relation to Leeds Bradford Airport, I am advised by Claire Acklam, Senior Legal Counsel, that protests have taken place by The Group for Action on Leeds Bradford Airport (GALBA) in respect of the planning application submitted in relation to nighttime flying at the airport. I understand that such protests have not taken place at the airport itself but rather at Leeds City Centre locations – copies of news articles reporting on such protests are exhibited at **Exhibit AJW29**.

14. **FULL AND FRANK DISCLOSURE**

- 14.1 The Claimants are aware and mindful of their continuing duty to provide full and frank disclosure to the Court and consider that this duty has been complied with via the provision of this witness statement.
- 14.2 In accordance with that duty, I make reference to an incident at London Southend Airport on 8 June 2026, on which the text of a briefing note reporting on such incident, which was shared with Claire Acklam (Senior Legal Counsel of Leeds Bradford Airport) by Southend Airport's Head of Security, is exhibited at **Exhibit AJW30**. The briefing note states:

"Briefing Note Incident London Southend Airport 08/06/2026

Around 05.00 hrs on 08/06/2026 a group of 48 students arrived at London Southend Airport. They went straight to security. Only 1 had a hold bag. During the security screening process, one of the group was found to have a Just Stop Oil (JSO) orange hat in her bag. This had Just Stop Oil and their skull logo on it. The same student had a tin of 'Super Glue' hairspray. When asked why she had the items, she stated that someone had given it to her as a dare to carry for fresher week and gave very vague answers to questions asked. Another student was found to have a cabin bag with 3 handheld 'walkie talkie' radios in it. These were covered in coloured glass beads to look like child's toys, but were of a good quality Motorola Brand. When asked, her explanation was her friends preferred to use them rather than mobile phones on a night out. The girl was very argumentative and challenging towards security staff. All were well spoken students who appeared to be associated with Kings College and

UCL, given the logos on their clothing. Two further large tins of the same style hair spray were found in other students bags.

Once through security, a number of students appeared from the rest rooms with bright orange t shirts on (the same colour orange as JSO). The T shirts had writing on which read 'Malta Hockey tour 2026'. At the same time, small groups started to position themselves all around the terminal, at or near to exit doors to the apron. The booking was confirmed as being made by 1 person, who had booked 24 flights a month ago, and the other 24 a week before departure . In the 24 hrs prior to departure, there were also another 50 people booked on the Malta flight, which easyJet stated was unusual activity for this route. Police were called and they positioned around the terminal. Other flights were boarded with Police at the gates to clear the terminal down, leaving only the Malta flight passengers.

When Police arrived, the students behaviour was observed. It appeared several older people were briefly communicating with the student group, but were not sitting with them. The older people were in smaller groups of 2 and were constantly walking around the terminal. Lots of texting was taking place, with many of the students appearing to pick up phones at exactly the same time to read texts. There appeared to be more movement around the terminal than would be usual for a delayed flight.

When the Police had enough resources, airport staff spoke to the organisers. The student group did not say they had any association with the older people. The main group of 48 students were taken back to CSA and conversations had with them. This did not ascertain much information, as all appeared to say exactly the same, however stories varied a lot as to where they were staying in Malta. All students had their bags searched (with their own consent) and nothing further was found. This was done in the presence of Police. Once cleared they were allowed to fly. It was noticed by airport security staff that a lot of the clothing in the bags appeared old and the toiletries were mainly half used items and cheap non branded perfumes

Once concluded, on the face of it, the incident did 'appear' to be a large group of students going on a hockey tour. We were unable to link anything to the adults who were seen talking with them. At this time, we do not know if the group had any other intentions, however we dealt with the incident as a potential protest related incident until it was clarified otherwise. The details of the LSA injunction were given to the organisers. The final outcome was a 2 hour delay, which disrupted operations in the terminal and required Police attendance".

- 14.3 Quite what the aims/motivations of those involved were is unclear from the above briefing note, but it does reinforce in my view the comments made above at paragraph 7 on the risks and harm presented by direct/unlawful protest activity at the airports and how, especially given the currently heightened terrorism threat level in the UK, protest at airports could be interpreted by airport security services as a possible terror threat – necessitating the need for energy and resources to be diverted in order to address it.

15. **CONCLUSION**

- 15.1 I am informed by Claire Acklam, Senior Legal Counsel (on behalf of the First Claimant), David Norris, Head of Legal (on behalf of the Second Claimant) and Mark Hunt, Chief Financial Officer (on behalf of the Third and Fourth Claimants) that the Claimants' directors have concluded that they should respectfully request the Court to order that the injunctions remain in full force and effect, subject to a review in 12 months' time as provided by the 2024 Orders and subject to an amendment to plan 2 to the London Luton order. I understand that they reached this decision after having considered carefully whether the threat of unlawful action has abated materially and having formed the view that it has not abated for the purposes of this year's review hearing given the evidence set out above, and in particular, the elevated terrorism threat level. If the injunctions are continued in full force and effect, subject to a review in 12 months' time, the Claimants will reassess matters afresh next year.
- 15.2 The impact of climate change continues to be firmly on the public agenda, continues to attract strong feelings and is still a subject about which campaigners are willing to contemplate disruptive action. The inference drawn by the Claimants (and by me) is that the injunctions granted over time have influenced the pattern of protest, with disruptive action being focused principally on targets which do not have the benefit of the Court's protection by way of injunction. The Claimants therefore remain very concerned that protest groups, including but not limited to those referred to in this witness statement, will undertake disruptive direct

action by way of trespass at the subject airports and/or causing a private or public nuisance on or around them if the injunctions were now to be lifted.

- 15.3 As is clear from the evidence, any such disruptive direct action would cause significant harm. There would be an impact on the Claimants' operations, the operations of the airlines and businesses operating from them, the travelling public as well as the associated financial impact for all concerned.
- 15.4 The Claimants consider that the injunctions have had a deterrent effect and prevent the irreparable and serious potential harm that might be caused should the Defendants undertake any direct/unlawful protest activity in or around their respective airports. It is for this reason that they seek the injunctions remain in full force.
- 15.5 The risks are especially acute at this time of year: most of the incidents in which UK airports were targeted by environmental protestors in 2024 occurred between late June and August 2024 - the busiest period for holiday travel.

16. **NOTICE OF THE REVIEW HEARING**

16.1 The Claimants intend to give notice of the review hearing in the manner provided for in paragraph 9 of the 2024 Orders – namely by:

16.1.1 Uploading a copy of the application dated 2 June 2026, the draft Order, a copy of this witness statement and exhibits and details of the review hearing to each of the injunction websites;

16.1.2 sending copies of the documents referred to in the previous paragraph to the email addresses referred to in Schedule 3 to the 2024 Orders plus the following additional email addresses:

16.1.2.1 info@takebackpower.net and press@takebackpower.net which are understood to be linked to Take Back Power;

16.1.2.2 shut_the_system_info@proton.me, which is understood to be linked to Shut the System;

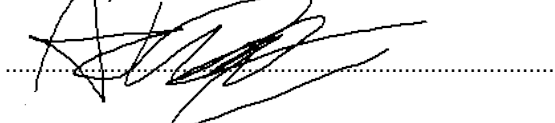
16.1.2.3 campaigner@fossilfreelondon.org and operations@fossilfreelondon.org which are understood to be linked to Fossil Free London; and

16.1.2.4 YouthDemandPress@protonmail.com and youthdemand@proton.me, which are understood to be linked to Youth Demand.

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

I believe that the facts stated in this Witness Statement and Exhibits are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

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



Alexander James Wright

Legal Director, Eversheds Sutherland (International) LLP

11 June 2026

Appendix 1

London Luton Airport Byelaws 2005		London Luton Airport Byelaws 2025	
2.24	No person shall remain on the airport or any part thereof, after having been requested to leave by an airport official or by a constable, and no airport official or constable shall request a person to leave unless he has reasonable grounds to believe that that person has committed or is about to commit a breach of a byelaw or a criminal offence.	19.1	An Airport Official or Constable may make an oral or written request to a person, for that person to leave the Airport and not return for a period of 24 hours from the time of that request, if that Airport Official or Constable has reasonable grounds to believe that that person has committed or intends to commit a criminal offence (including a breach of these byelaws).
		19.2	No person, without Permission, shall fail to immediately leave the Airport, and not return for a period of at least 24 hours, if requested to do so by an Airport Official or Constable in accordance with byelaw 19.1.
		19.4	An Airport Manager or a Constable may issue an Exclusion Notice to a person by either handing that Exclusion Notice to that person or by posting or leaving it at the last known residential address of that person.
		19.5	No person issued with an Exclusion Notice in accordance with byelaw 19.4, without Permission, shall: 19.5.1 if present at the Airport when issued with that Exclusion Notice, fail to immediately leave the Airport; or 19.5.2 enter the Airport at any time during the Exclusion Period set out in that Exclusion Notice
2.16	No person shall organise or take part in any public assembly, demonstration or procession likely to obstruct or interfere with the proper use of the airport or obstruct or interfere with the comfort and convenience or safety of passengers or persons using the airport.	8.8	No person, without Permission, shall organise or take part in any public assembly, protest, demonstration or procession
2.1	No person shall tamper with any aircraft or anything that causes, or is likely to cause, damage to or interfere with the safe running or security of any aircraft.	2.1	No person, without Permission, shall operate, or interfere with, any Airport Infrastructure or Airport Equipment, or attempt to do so.
		2.3	No person shall damage, tamper with, intentionally or recklessly misuse, or intentionally or recklessly prevent the normal operation of, any Airport Infrastructure or Airport Equipment.
		17.7	No person shall tamper with any Aircraft or do anything that causes, or is likely to cause, damage to or interference with the safe running or security of any Aircraft.
2.3	No person shall enter or get on or attempt to enter or get on any vehicle or item of plant, machinery or other piece of equipment without permission.	2.5	No person shall enter, attempt to enter or mount, or use any Airport Equipment or Airport Infrastructure, other than in the ordinary course of its use and for a reasonable and proper purpose.
2.12	No person shall climb any wall, fence, barrier, railing, post, ladder or tower without permission.	2.12	No person, without Permission, shall climb any building, structure, wall, fence, barrier, railing, post, ladder or tower.
2.21	No person shall loiter on, frequent or remain on the airport or any part thereof without reasonable cause.	8.2	No person, without Permission, shall enter, loiter on frequent or remain at the Airport or any part of it other than for a reasonable and proper purpose.

2.26	<i>No person shall distribute or display signs, advertisements, circulars or other printed or written matter without permission.</i>	8.9	<i>No person, without Permission, shall: 8.9.1 display or erect any flags, banners, or signs; or 8.9.2 wear or display any clothing, badges or emblems likely to cause harassment, alarm, distress or a breach of the peace.</i>
		8.10	<i>No persons (without lawful excuse) shall fail to remove from the Airport any flags, banners, signs or emblems displayed or erected by that person at the Airport after being asked to undertake such removal by an Airport Official or a Constable.</i>
		8.13	<i>No person, without Permission, shall distribute or display signs, advertisements, pamphlets, flyers, circulars or other printed or written matter.</i>

For ease of review, relevant definitions from the London Luton Airport Byelaws 2025 referred to above include:

1. **"Airport Infrastructure"** means all buildings, structures, fixtures, fittings, services, cables, pipes, drains and other conduits, (whether portable or fixed) at the Airport including, but not limited to:
2.
 - 2.1 radio and other navigational aids for the purpose of controlling, guiding or assisting the operation of Aircraft either at the Airport or serving the Airport;
 - 2.2 walls, fences, railings, gates and barriers;
 - 2.3 lighting columns and lights;
 - 2.4 car park cameras, pay machines and entry or exit barriers;
 - 2.5 road traffic, no-waiting and unloading signs and other wayfinding;
 - 2.6 parking infringement enforcement equipment including cameras, Vehicles, automatic number plate recognition systems, and other equipment used for such purposes;
 - 2.7 public seating;
 - 2.8 fittings and equipment within toilets to which the public have access;
 - 2.9 fire alarm, fire detection, fire prevention, and fire-fighting equipment;
 - 2.10 closed circuit television cameras;
 - 2.11 baggage handling equipment;
 - 2.12 x-ray machines, conveyor systems, and all other equipment used for the purposes of security;
 - 2.13 any Vehicle used in connection with the operation of the Airport and any of its services or facilities;
 - 2.14 doors, escalators, lifts, and conveyor belts;
 - 2.15 telephone, radio, or other apparatus provided for transmitting and receiving messages;
 - 2.16 check-in desk and boarding gate desk equipment; and
 - 2.17 gas pipes, gas outlets, electric cables, fuse boxes and electric outlets.
3. **"Airport Equipment"** means all equipment, machinery, tools and Vehicles utilised by or on behalf of LLA, or another person, in connection with the operation of the Airport.
4. **"Airport Official"** means a person:
 - 4.1 employed or otherwise engaged by LLA, or by a contractor to LLA (including LLA's appointed air traffic controller), to work at the Airport from time to time;
 - 4.2 a person employed or otherwise engaged by Border Force or HM Revenue & Customs at the Airport from time to time; or
 - 4.3 a person otherwise authorised by LLA from time to time to act as an "airport official".
5. **"Airsides"** means such parts of the Airport which are within the Security Perimeter from time to time, including those parts of a Public Terminal within the Security Perimeter and all gates, stands, aprons, taxiways and runways.
6. **"Landside"** means such parts of the Airport which are not within the Security Perimeter from time to time.
7. **"LLA"** means London Luton Airport Operations Limited or its successors as operator of the Airport.

8. **"Permission"** means the prior consent given by, or on behalf of, LLA (and such consent may include, where the context permits, permissions given verbally or in writing by Airport Officials, permissions set out in Notices, or consents or permission set out in agreements, permits, licences or leases entered into with, or issued by, LLA).
9. **"Security Area"** means each part of the Airport designated by LLA from time to time as a "security area", including all areas in which security screening and checking functions are undertaken by, or on behalf of, LLA.
10. **"Security Perimeter"** means the security perimeter at the Airport (as designated by LLA) which separates Airside locations (including "critical parts") from Landside locations.

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

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

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW1

This is the exhibit marked "AJW1" in the witness statement of Alexander James Wright.

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(1) LEEDS BRADFORD AIRPORT LIMITED

AND THREE OTHERS

- v -

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

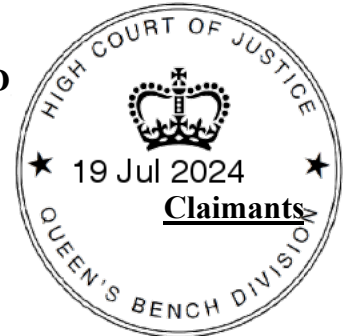
AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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



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

IMPORTANT NOTICE TO THE DEFENDANTS

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

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex-parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the first witness statements: of Alexander James Wright dated 16 July 2024, 17 July 2024, (another) 17 July 2024; and 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden, Counsel for the Claimants and no one attending for the Defendants.

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

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to protestrequest@lba.co.uk.

DEFINITIONS

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

"Warning Notice" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

<https://www.leedsbradfordairport.co.uk/injunction>. at which copies of this Order may be viewed and downloaded).

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.
2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the First Defendant:
 - a. Uploading a copy onto the following website:
<https://www.leedsbradfordairport.co.uk/injunction>.
 - b. Sending an email to each of the email addresses listed in Schedule 3 to this Order (1) stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and (2) attaching this Order.
 - c. Affixing a notice at those locations marked with an “X” on Plan 1 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form of Schedule 4.
4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraph 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.
6. The Court will provide sealed copies of this Order to the First Claimant’s solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.
8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3 and 4. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the First Defendant of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the First Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.
13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE FIRST CLAIMANT

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

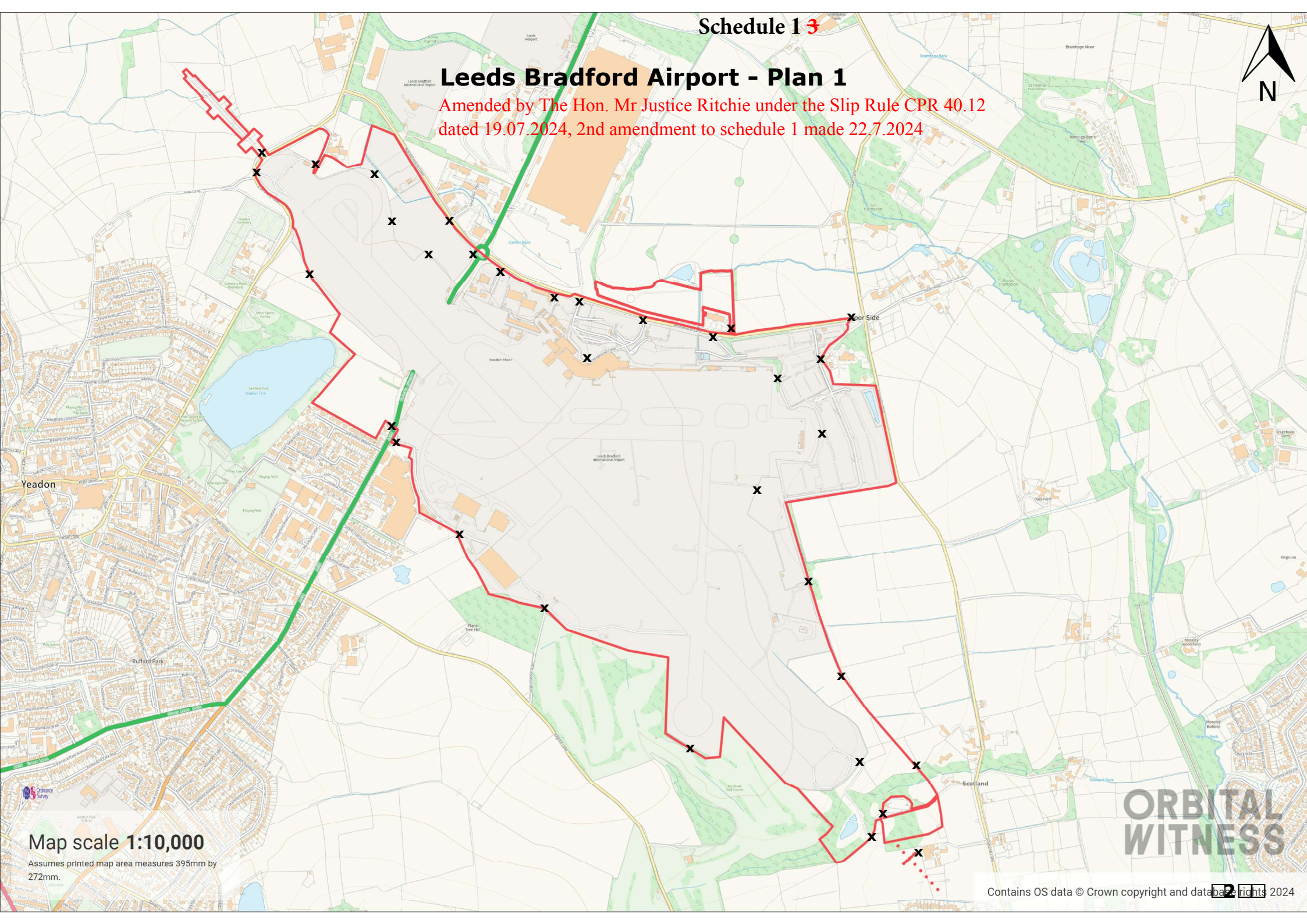
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

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

Leeds Bradford Airport - Plan 1

Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024



Map scale 1:10,000

Assumes printed map area measures 395mm by 272mm.



ORBITAL WITNESS

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

- (1) The First Claimant will take steps to serve the First Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
- (2) The First Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 (“the Order”)

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

FROM: Leeds Bradford Airport Limited (the “**First Claimant**”)

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

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

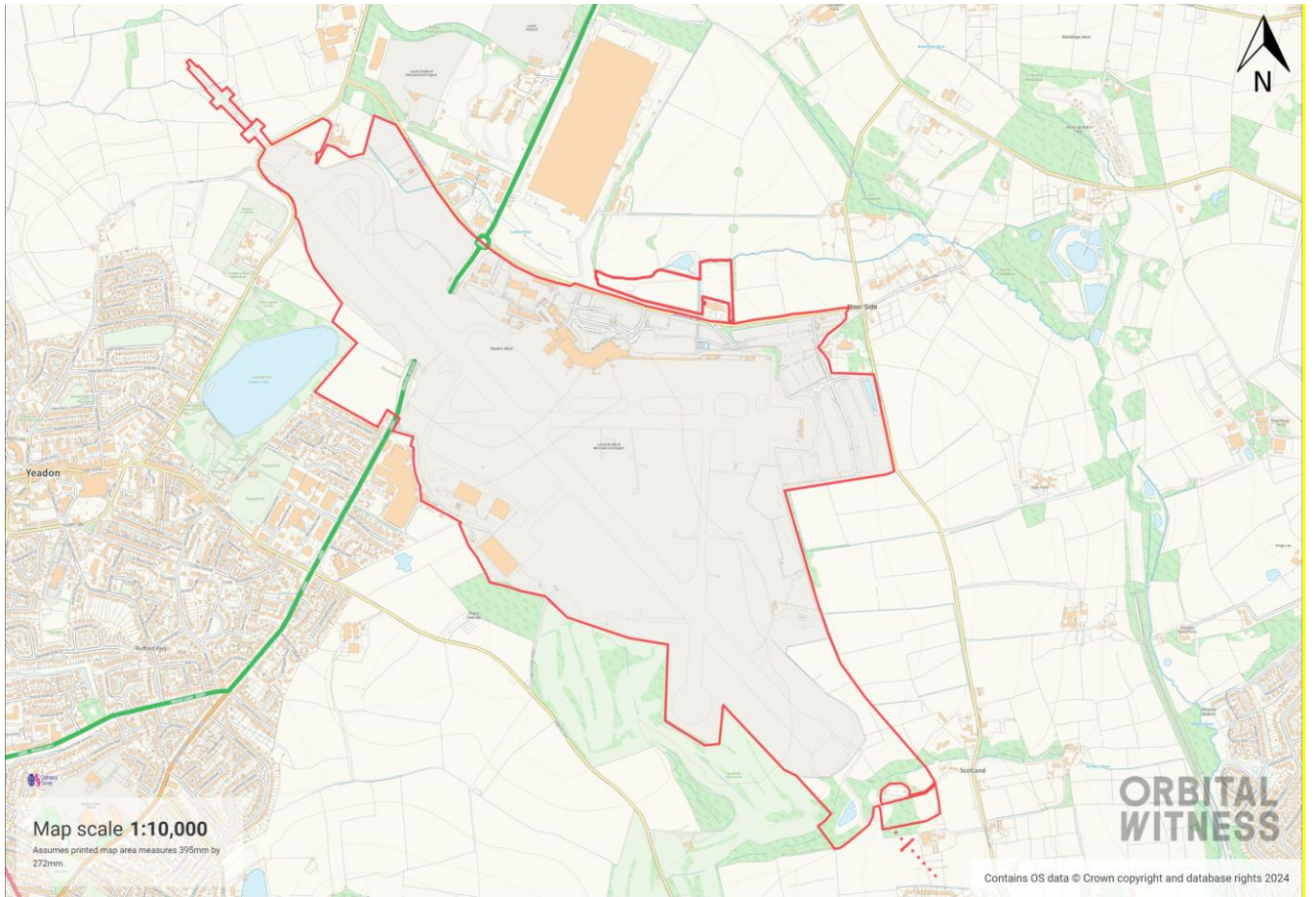
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

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

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

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

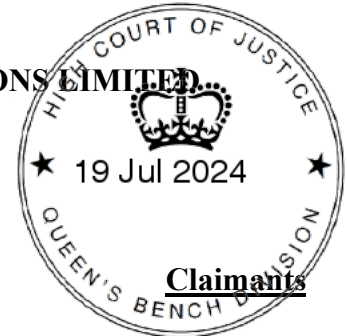


IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

AND THREE OTHERS



- v -

KB-2024-002317

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 19 July 2024.

UPON the Claimants' claim by the Claim Form issued on 16 July 2024.

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, dated 17 July 2024, (and another) 17 July 2024 and dated 18 July 2024; Vincent Hodder dated 15 July 2024; Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants.

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

AND UPON the Second Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London Luton Airport, as defined by this Order, should be made by email to protestrequest@ltn.aero.

DEFINITIONS

"London Luton Airport" means the land shown in red outlined in red on Plan 2 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

"Warning Notice" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address <https://www.london-luton.co.uk/corporate/lla-publications/injunction> at which copies of this Order may be viewed and downloaded.

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of London Luton Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.
2. This Order is subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Second Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the Second Defendant:
 - a. Uploading a copy onto the following website: <https://www.london-luton.co.uk/corporate/lla-publications/injunction>.
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and attaching this Order.
 - c. Affixing a notice at those locations marked with an “X” on Plan 2 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form in Schedule 4.
4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the Second Defendant and each of them.
6. The Court will provide sealed copies of this Order to the Second Claimant’s solicitors for service (whose details are set out below).
7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

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

FURTHER DIRECTIONS

- 9.□ Service on the Second Defendant of any further applications or documents in the proceedings by the Second Claimant shall be effected by carrying out each of the steps in paragraph 3.
- 10.□ Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Second Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Second Claimant's solicitors at least 48 hours in advance of any hearing.
- 11.□ Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
- 12.□ Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second Claimant's solicitors.
- 13.□ The Second Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
- 14.□ No acknowledgment of service, admission or defence is required by any party until further so ordered.
- 15.□ Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE SECOND CLAIMANT

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

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

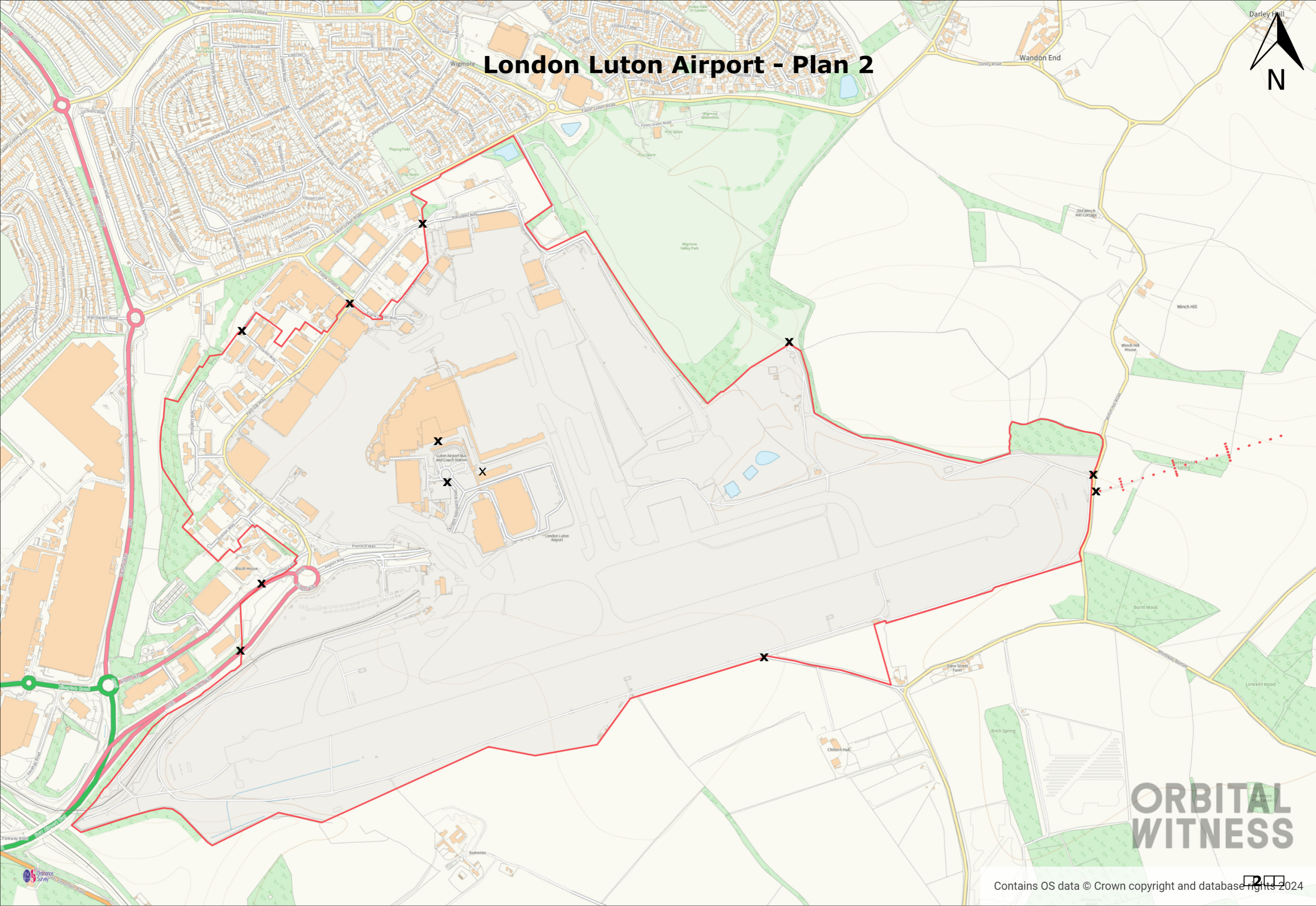
07712 881 393

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

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

SCHEDULE 1

London Luton Airport - Plan 2



**ORBITAL
WITNESS**

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND CLAIMANT

- (1) The Second Claimant will take steps to serve the Second Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
- (2) The Second Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 (“the Order”)

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

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

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

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.

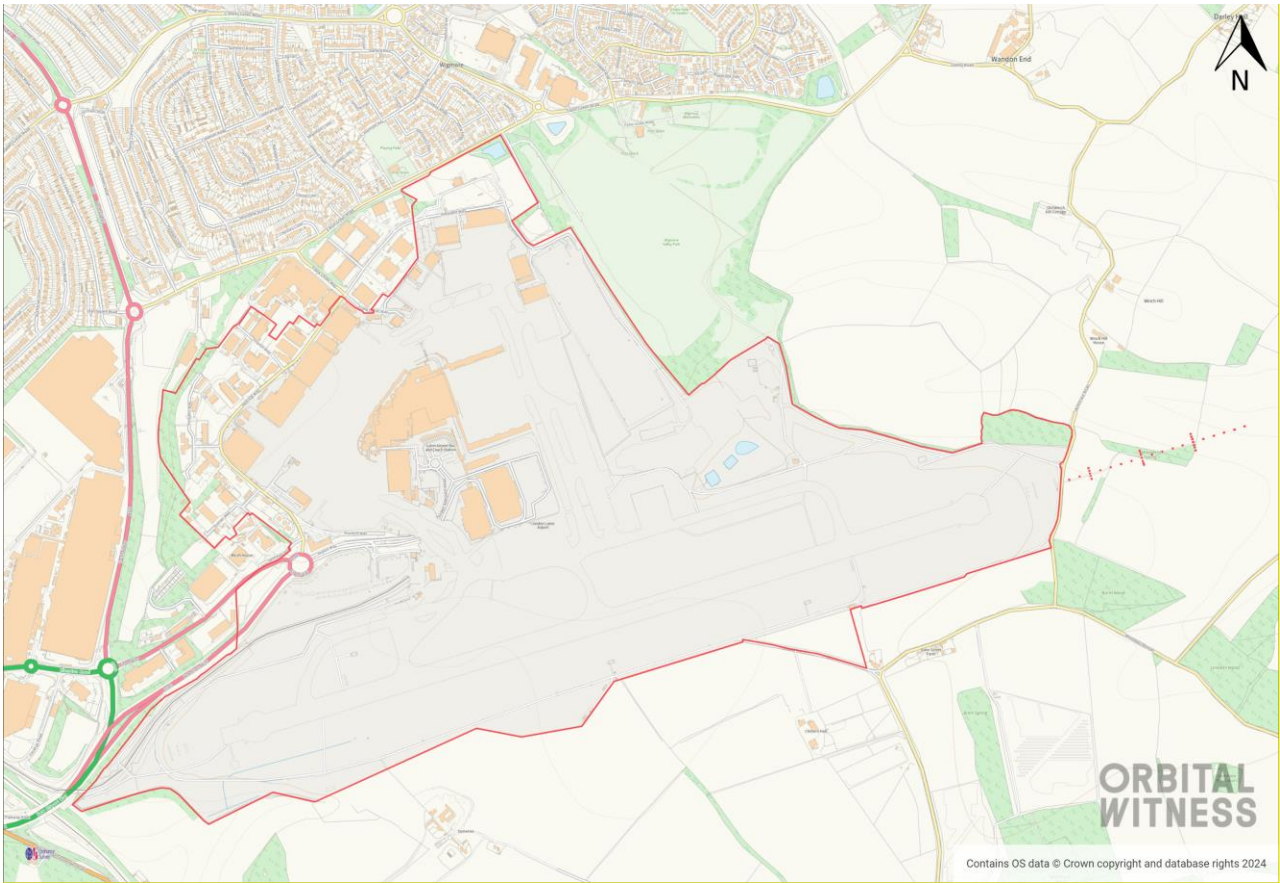
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

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

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

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



IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

AND TWO OTHERS



- v -

KB-2024-002317

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO

BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

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

BEFORE The Honourable Mr Justice Ritchie on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, 17 July 2024, (and another) 17 July 2024, dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants

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

AND UPON the Third and Fourth Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Newcastle International Airport, as defined by this Order, should be made by email to protestrequest@newcastleinternational.co.uk

DEFINITIONS

"Newcastle International Airport" means the land shown in red outlined in red on Plan 3 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

"Warning Notice" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address <https://www.newcastleairport.com/about-your-airport/airport-company/injunction/> at which copies of this Order may be viewed and downloaded).

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Newcastle International Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants (or either of them).
2. This Order is subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Third and Fourth Claimants shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the Third Defendant:
 - a. Uploading a copy onto the following website:
<https://www.newcastleairport.com/about-your-airport/airport-company/injunction/>
 - b. Sending an email with this Order attached to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
 - c. Affixing a notice at those locations marked with an “X” on Plan 3 setting out where these documents can be found and obtained in hard copy in the form of Schedule 4.
4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraph 3 shall be good and sufficient service of this Order and of the Claim Documents upon the Third Defendant and each of them.
6. The Court will provide sealed copies of this Order to the Third and Fourth Claimants’ solicitors for service (whose details are set out below).

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

FURTHER DIRECTIONS

9. Service on the Third Defendant of any further applications or documents in the proceedings by the Third and Fourth Claimants shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Third and Fourth Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Third and Fourth Claimants' solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Third and Fourth Claimants' solicitors.
13. The Third and Fourth Claimants (or either of them) have liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

Ritchie J

Made 19.7.2024

COMMUNICATIONS WITH THE THIRD AND FOURTH CLAIMANTS

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

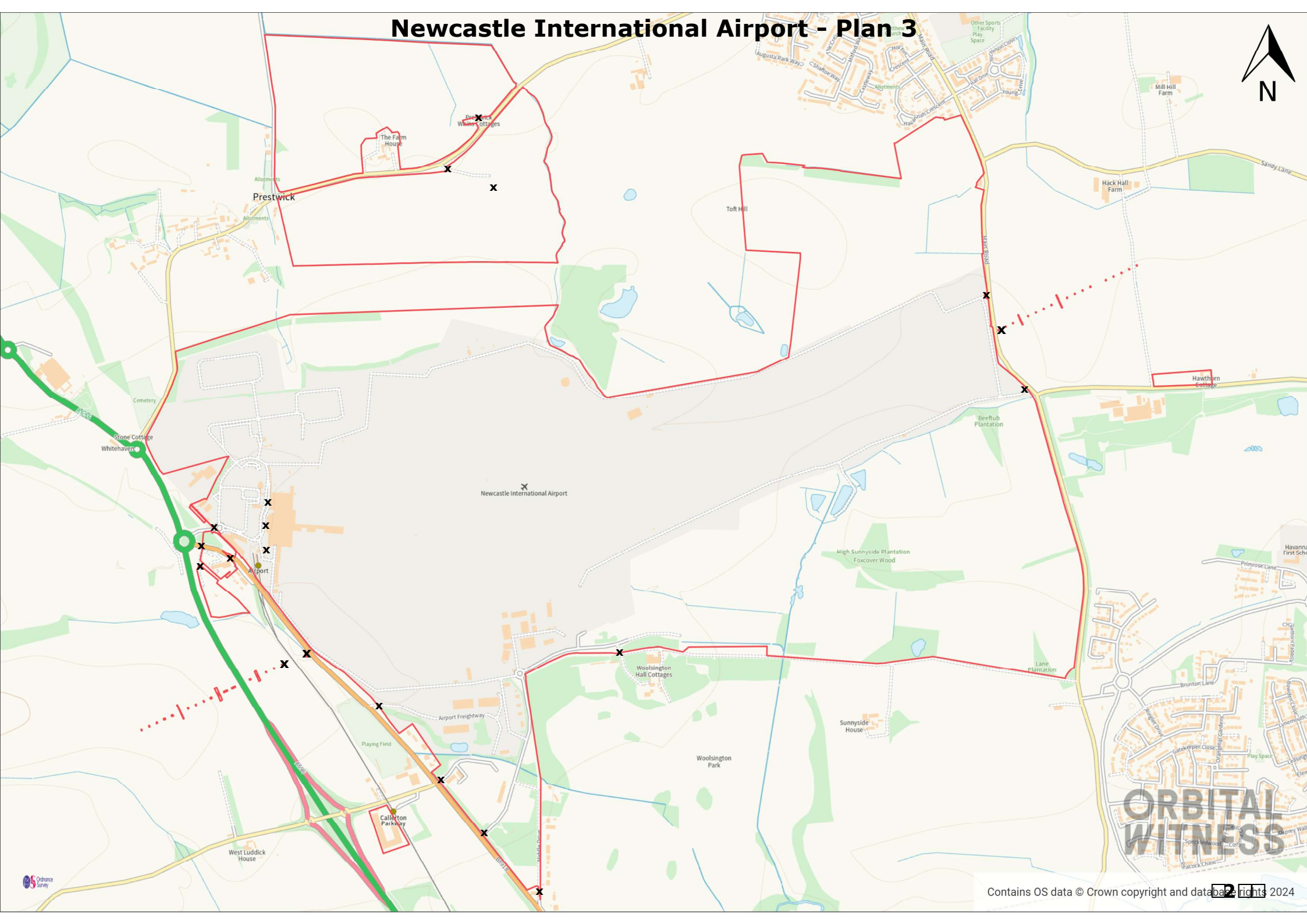
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

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

SCHEDULE 1

Newcastle International Airport - Plan 3



**ORBITAL
WITNESS**



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

- (1) The Third and Fourth Claimants will take steps to serve the Third Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
- (2) The Third and Fourth Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

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

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force**NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")**

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

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

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

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants.

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

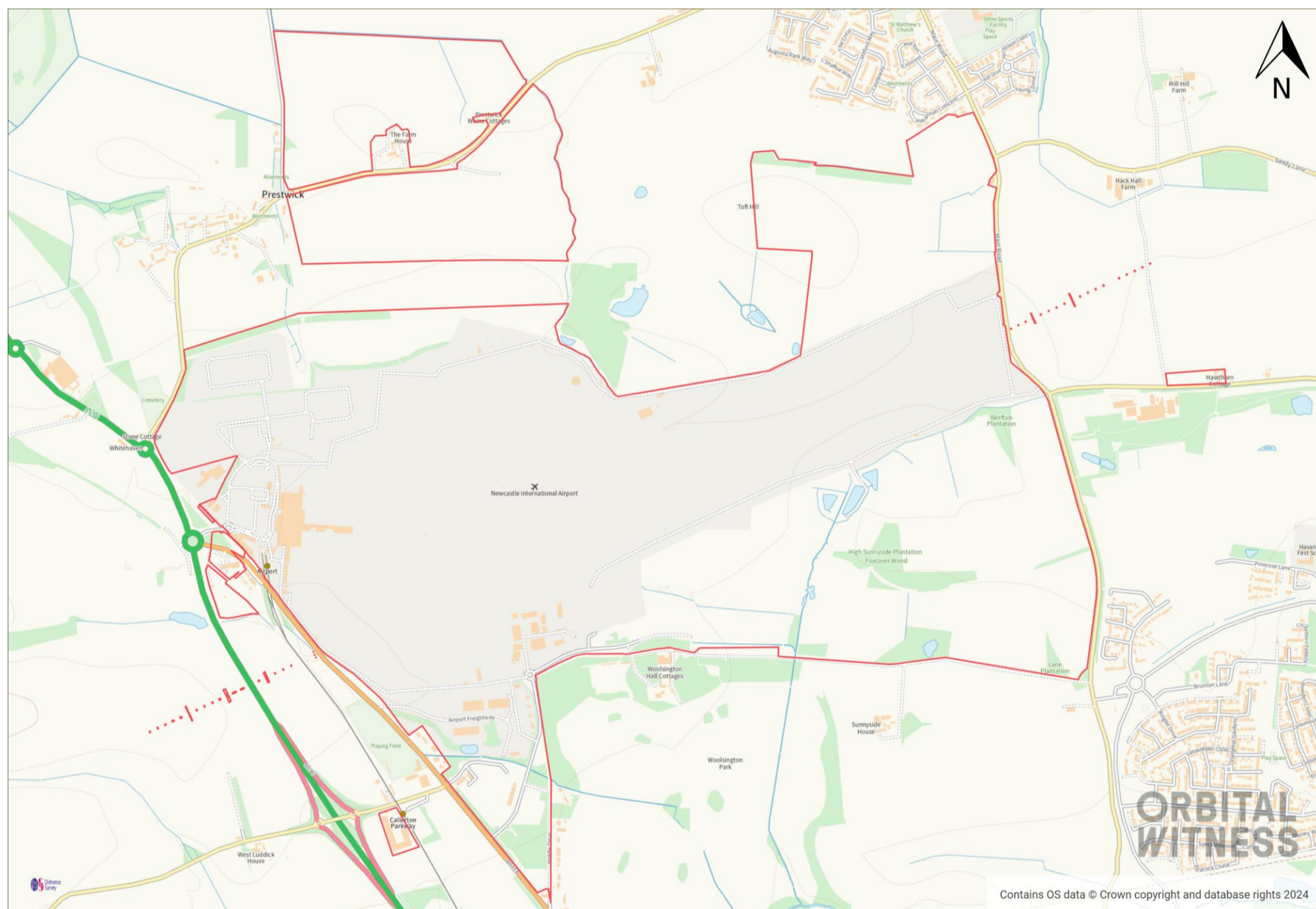
You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

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

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at:

<https://www.newcastleairport.com/about-your-airport/airport-company/injunction/>

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



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

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

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW2

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR JUSTICE BOURNE

ON: 24 June 2025

B E T W E E N : -

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



-and-

KB-2024-002317

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

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

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

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UPON the injunction made by Order dated 19 July 2024 by Ritchie J (“**the Ritchie J Order**”)

AND UPON the Claimants’ application dated 2 June 2025

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

AND UPON reading the application and the witness evidence in support

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

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

IT IS ORDERED that:

1. The Ritchie J Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 2 of the Ritchie J Order).

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

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

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR JUSTICE BOURNE

ON: 24 June 2025

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- (1) LEEDS BRADFORD AIRPORT LIMITED**
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(4) NIAL SERVICES LIMITED



-and-

KB-2024-002317

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR JUSTICE BOURNE

ON: 24 June 2025

B E T W E E N : -

- (1) LEEDS BRADFORD AIRPORT LIMITED**
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(4) NIAL SERVICES LIMITED



-and-

KB-2024-002317

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UPON the injunction made by Order dated 19 July 2024 by Ritchie J (“**the Ritchie J Order**”)

AND UPON the Claimants’ application dated 2 June 2025

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

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

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW3

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Royal Courts of Justice
Strand
London, WC2A 2LL

Wednesday, 26th August 2025

BEFORE:

MR JUSTICE BOURNE

BETWEEN:

LONDON CITY AIRPORT LTD & ORS

Claimants

- and -

PERSONS UNKNOWN

Defendants

MR T MORSHEAD KC, MS E BARDEN (instructed by Eversheds Sutherland International LLP) appeared on behalf of the Claimant
THE DEFENDANTS were not present and not represented

JUDGMENT

(Approved)

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(Official Shorthand Writers to the Court)

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1. MR JUSTICE BOURNE: At this hearing I conducted the first annual review of injunctions granted at the separate hearings of four claims last year, concerning activities by environmental protestors at a total of ten airports at different locations in England. The relevant airports are identified in each order.
2. The claimants were represented by Mr Morshead, King’s Counsel and Ms Baden of counsel. There was no appearance by any defendant or by anyone expressing opposition to the continuation of the injunctions.
3. The injunctions were sought because in 2024, airports in England and elsewhere became targets in campaigns of disruptive environmental protest, notably by the campaigning group, “Just Stop Oil” (“JSO”). Individual airports and groups of airports sought injunctive relief against “Persons Unknown”, invoking the “newcomer” jurisdiction as explained by the Supreme Court in *Wolverhampton City Council v London Gypsies and Travellers* [2023] UKSC 47, [2024] 1 AC 983 (“Wolverhampton”).
4. I have read the judgments given when the original injunctions were granted of Julian Knowles J (20 June 2024, KB-2024-176) HHJ Coe KC (5 July, KB-2024-002132) and Ritchie J (19 July 2024, KB-2024-002317). I have also seen a note of what was said by Jacob J in KB-2024-002473 on 6 August 2024.
5. By way of context, I note that orders were also made at hearings in other claims concerning Heathrow (Julian Knowles J, 24 July 2024), Gatwick (Ritchie J, 19 July 2024) and Southend Airports (Farbey J, 14 August 2024). This review does not encompass those three cases.
6. Each judge was satisfied that an injunction was necessary to restrain the threat of tortious conduct and that it was just and convenient to make an order. In particular, because of threats of unlawful action by protest groups, viewed in the light of some previous incidents, and the potential for such action to cause health and safety risks (to the public, airport staff, emergency services and/or the protestors themselves) and delay and disruption to the public. In addition, each judge was satisfied that it was appropriate to grant injunction against “Persons Unknown.”

7. I shall note increase the length of this judgment or extend the corpus of judicial discussions of this broad subject by repeating the statements of legal principle and factual considerations, which were set out by the judges when granting the injunctions last year.
8. It is, in particular, unnecessary for me to explore some distinctive characteristics of these cases which were considered by the judges, notably the fact that the claims concern a combination of (1) land owned by the claimants, (2) land not owned by the claimants but on which there is airport infrastructure and (3) public highways in and around the airports. The injunction granted to London City Airport covers land in category (1) only, whereas the injunctions in the other three cases cover all three categories. The claimants are not seeking any geographical expansion of the injunctions granted last year. London City Airport seeks, and I will grant, permission to amend to reflect a change of ownership of one specific area.
9. The nature of a review hearing of this kind was considered in *Wolverhampton* at paragraph 225, where the Supreme Court observed that the hearing:

“...will give all parties an opportunity to make full and complete disclosure to the court, supported by appropriate evidence as to how effective the order has been, whether any reasons or grounds for its discharge has emerged, whether there is any proper justification for continuance; and whether and on what basis, a further order ought to be made.”

10. In *High Speed Two (HS2) Ltd & Anor v Persons Unknown* [2024] EWHC 1277 (KB), Richie J described the court’s task at a review hearing:

“Drawing these authorities together, on a review of an interim injunction against PUs [Persons Unknown] and named Defendants, this Court is not starting *de novo*. The Judges who have previously made the interim injunctions have made findings justifying the interim injunctions. It is not the task of the Court on review to query or undermine those. However, it is vital to understand why they were made, to read and assimilate the findings, to understand the sub-strata of the **quia timet**, the reasons for the fear of unlawful direct action. Then it is necessary to determine, on the evidence, whether anything material has changed. If nothing material has changed, if the risk still exists as before and the claimant remains rightly and justifiably fearful of

unlawful attacks, the extension may be granted so long as procedural and legal rigour has been observed and fulfilled.

33. On the other hand, if material matters have changed, the Court is required to analyse the changes, based on the evidence before it, and in the full light of the past decisions, to determine anew, whether the scope, details and need for the full interim injunction should be altered. To do so, the original thresholds for granting the interim injunction still apply.”

11. I have therefore considered whether, since last year’s injunction orders were made, there has been any material change affecting, diminishing or removing the need for them to be in place.
12. Each application for review is supported by a witness statement by Stuart Wortley, a partner in Eversheds Sutherland (International) LLP, who represent the claimants. He sets out a chronology of incidents and events, occurring both before and since last year’s injunctions.
13. Of the events postdating any or all of the injunctions, Mr Moreshead emphasises several, including the following:-
 - (a) On 19 July 2024, one of the JSO founders, Roger Hallam, was found guilty with others of conspiring to organised protests to block the N25 motorway in November 2022. He was sentenced to five years in prison, later reduced on appeal to four years.
 - (b) On 24 July 2024, ten JSO activists were arrested at Heathrow Airport, seemingly equipped to be able to cut through fences and/or affix themselves to parts of the land or aircraft. Of those individuals, nine were later found guilty by a jury of conspiracy to cause a public nuisance. Five were sentenced to terms in prison of up to 15 months, and four were given suspended sentences.
 - (c) On 27 July 2024 a protest which was due to occur at London City Airport, was relocated to the Department of Transport.
 - (d) On 29 July 2024, eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure.

(e) On 30 July 2024, two JSO activists were arrested at Heathrow Airport after spraying orange paint around the Terminal 5 entrance hall and on destination boards in the departure lounge. Following a criminal trial, the jury was unable to return a verdict.

(f) On 31 July 2024, a protest by JSO and Fossil Free London, was held at the Docklands Light Railway Station, at London City Airport. That being an area excluded from the red line of the injunction.

(g) On 1 August 2024, six JSO activists were blocked access to the departure gates at Heathrow Terminal 5.

(h) On 5 August 2024, five JSO activists were arrested on their way to Manchester Airport and were in possession of bolt cutters, angle grinders, glue, sand and banners reading “oil kills”. Four of these individuals were subsequently found guilty of conspiracy to commit a public nuisance and then sentenced to terms of imprisonment, ranging between 18 and 30 months.

(i) On 21 February 2025, XR held a demonstration at Inverness Airport against climate change.

(j) On 27 May 2025, JSO made an announcement which at least gave the impression that it had now decided to withdraw from mounting disruptive protests of a direct action nature.

(k) However, on 18 May 2025, GB News reported that JSO was considering a “dramatic U-turn” and on 21 May 2025, JSO sent a link to its subscribers with the comment, “GB News was right for once. We are ‘plotting a comeback’.”

(l) On 21 May 2025, London City Airport received intelligence information from the Metropolitan Police of a protest by environmental protest groups, which had been planned at Heathrow Airport, to be held at the Sofitel Hotel on 20 May 2025, where an annual general meeting for Shell was being held and which was within the redline boundary of the injunction obtained by that airport. The protest was relocated to the

Shell head office, “in order to avoid the risk of associated penalties for breaching the injunction.”

(m) Over the weekend of 14 and 15 June 2025, JSO arranged an event described as “Seeds of Rebellion”, which seemingly was part of a training programme – a “summer of resistance training” – where attenders would be taught how “to plan actions that cut through” and to “plant the seeds of the coming non-violent revolution.”

(n) JSO’s fundraising page currently invites donations for – “[A] New campaign [that] is in the works”

14. Mr Wortley’s evidence also mentions activities of other protest groups opposed to the use of fossil fuels including Youth Demand, Extinction Rebellion and Fossil Free London. He refers to disruptive protest activity in 2024 and 2025 by Extinction Rebellion, though not at airports. He also exhibited an email sent by the Metropolitan Police to London City Airport’s security team on 21 May 2025, which referred to the incident relating to the Shell AGM and said:

“...The injunction at [Heathrow Airport] had a real impact on the Shell protest yesterday and builds on your experiences. To remove an injunction now, would open up to further protest. And whilst JSO have stepped down, there appear to be a cycle of new groups emerging and this cannot be ruled out, so maintaining it would be very much recommended.”

15. I accept Mr Moreshead’s submission that that advice from the police is a relevant consideration. Although the announcement by JSO on 21 March 2025 could signal a reduction from the risk of unlawful activity at the airports, there is also clear evidence of a possible U-turn from that announcement. And, as Mr Morshead submits, even if JSO left the scene, it is too early to tell what the effect of that would be, having regard to the possibility of some JSO members continuing to support direct action, and to the continued existence of other protest groups. Nor is it possible to conclude that the risk has been materially reduced or removed by the imprisonment of some JSO activists referred to above.

16. Meanwhile, the substantial, though not total lack of direct action at the airports since the grant of the injunctions is consistent with the injunctions having proved to be an effective deterrent. I accept that removing the injunctions at present would create a real risk of a resumption of activity at airports.
17. When granting the injunctions, the judges last year concluded that enforcement of bylaws and criminal proceedings did not provide an adequate alternative remedy. That, in my view, has not changed.
18. In the circumstances considered as a whole, I conclude that there has been no material change which removes or seriously diminishes the justification or the rationale for the injunctions, and that they should continue in force.
19. Turning to the form of the order, Mr Morshead showed me the decision of Nicklin J in *MBR Acres Limited and Others v John Curtin & Persons Unknown* [2025] EWHC 331 (KB), which took a different approach of directing an injunction in a protest case, “**contra mundum**”, rather than by describing categories of defendants by reference to the conduct to be prohibited, which would also make service of the claim unnecessary. Nicklin J noted that the court must consider what other or better solutions may be available, having regard to enhanced police and local authority powers. He also indicated that orders should include a requirement that the court’s permission be obtained before any application is made to commit for contempt of court.
20. Mr Morshead submitted that it would be better in this case to retain a description of the intended defendants, by reference to the conduct being enjoined, and that that course was followed in a later decision of Soole J in *Chancellor, Masters and Scholars of the University of Cambridge v Persons Unknown* [2025] EWHC 724 (KB). He also submitted that a requirement for consent for committal proceedings should not be necessary, having regard to the safeguards built into the injunction and to the impact which applications for consent could have on costs and court resources.
21. In the present cases, the judges last year found it appropriate to describe or define the defendants by specific reference to the type of conduct to be enjoined. Although Nicklin J has identified a possible different approach, it seems to me that on a review

hearing, I should not change the approach taken by the previous judges, where the underlying circumstances have not materially changed. I am also mindful of the need, emphasised by the Supreme Court in *Wolverhampton* at paragraph 221, for defendants in injunctions to be defined as precisely as possible. It seems to me that that also favours a continuation of the approach taken last year.

22. Nor am I persuaded to depart from what was ordered last year by adopting a standard wording to define or describe the prohibited acts in the four cases before me. The differences in wording have not created any difficulty for me in conducting this review, and any potential defendant who has already become aware of the injunction in respect of any specific airport may already be aware of the existing wording, and that factor militates against a change.
23. I also accept the submission that it is not necessary to insert a provision requiring consent or permission to be obtained for any contempt application in the event of a breach of the injunction. Although such a provision could provide a helpful safeguard in some “**contra mundum**” cases, as described by Nicklin J in *MVR Acres*, in the present cases, no enforcement issue has arisen so far. That is by contrast with *MBR Acres*, where Nicklin J vigorously criticised the conduct of claimants who pursued a committal application, which he described as frivolous and bordering on vexatious. As Mr Morshead said, claimants who choose to commence committal proceedings for trivial breaches do so at their own risk. The courts have repeatedly said that, in cases which do not appear to have been cited to the court in *MBR Acres*, such as *Sectorguard Plc v Diene Plc* [2009] EWHC 2693 (Ch), per Briggs J at paragraph 46. Meanwhile, in the circumstances of the present case, I have no reason to expect that such an issue will arise.
24. It seems to me, by way of confirmation, that the steps taken to publicise the orders last year, remain appropriate and sufficient.
25. I will provide for the next review to take place in one year from now. It will remain open for anyone to apply to vary or discharge the orders before then. The cases will again be listed together upon that occasion, but I see no need to consolidate them.

26. I shall ask counsel to finalise the terms of an order whose effect is that the injunctions granted last year will remain in force. For practical reasons, and in principle, that seems to me preferable to the alternative of granting entirely new injunctions.

Epiq Europe Ltd hereby certify that the above is an accurate and complete record of the proceedings or part thereof.

Lower Ground, 46 Chancery Lane, London WC2A 1JE

Email: civil@epiqglobal.co.uk

This transcript has been approved by the Judge

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

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

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW4

This is the exhibit marked "AJW4" in the witness statement of Alexander James Wright.



Injunction

On 19 July 2024, the High Court granted us an injunction, which prohibits anyone from entering, occupying or remaining on Leeds Bradford Airport in connection with protesting about fossil fuels or the environment (whether in connection with Just Stop Oil or Extinction Rebellion or other campaign) without our permission.

Anyone breaching the injunction might be imprisoned for up to 2 years, fined and/or have their assets seized for contempt of court.

1. [Sealed Order](#)
2. [Hearing Bundle](#)
3. [Skeleton Argument](#)
4. [Note of the Hearing](#)

2025 – Extension Application

On 24 June 2025, the High Court extended the injunction. Documents relating to the review hearing are available here.

1. [Supplemental Hearing Bundle](#)
2. [Chronology](#)
3. [Skeleton Argument for Review Hearing](#)
4. [Sealed Order 24.06.2025](#)
5. [Judgement](#)



Injunction

On 18 July 2024, the High Court granted an injunction which prohibits anyone from entering, occupying or remaining on London Luton Airport in connection with the Just Stop Oil campaign (or any other environmental campaign) without our permission.

Anyone breaching the injunction might be imprisoned for up to two years, fined and / or have their assets seized for contempt of court.

Documents relating to the Injunction can be found on the following links on this page.

Injunction Application 2024

[Sealed Order 2024](#)

[Sealed Order granting permission to amend Claim Form etc.](#)

[Amended Claim Form](#)

[Plans 1-3 to the Claim Form](#)

[Amended Particulars of Claim](#)

[Hearing Bundle](#)

[Alex Wright - Second Witness Statement](#)

[Alex Wright - Third Witness Statement](#)

[Alex Wright - Fourth Witness Statement](#)

[Skeleton Argument](#)

[Note of the Hearing](#)

Extension Application 2025

On 24 June 2025, the High Court extended the injunction.

Documents relating to the review hearing are available below.

[Sealed Order 2025](#)

[Supplemental Hearing Bundle](#)

[Claimant's Skeleton Argument](#)

[Claimants' Chronology](#)

[Airport Injunction Renewal Transcript](#)



Injunction

Injunction

[Court Order 19.07.24](#)

[The Hearing Bundle Part 1](#)

[The Hearing Bundle Part 2](#)

[The Hearing Bundle Part 3](#)

[Skeleton Argument](#)

[Note of the Hearing](#)

2025 Renewal Hearing

[Court Order 24.08.25](#)

[Supplemental Hearing Bundle](#)

[Skeleton Argument](#)

[Chronology](#)

[Transcript of the Judgement](#)

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
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- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
- (4) NIAL SERVICES LIMITED

Claimants

-and-

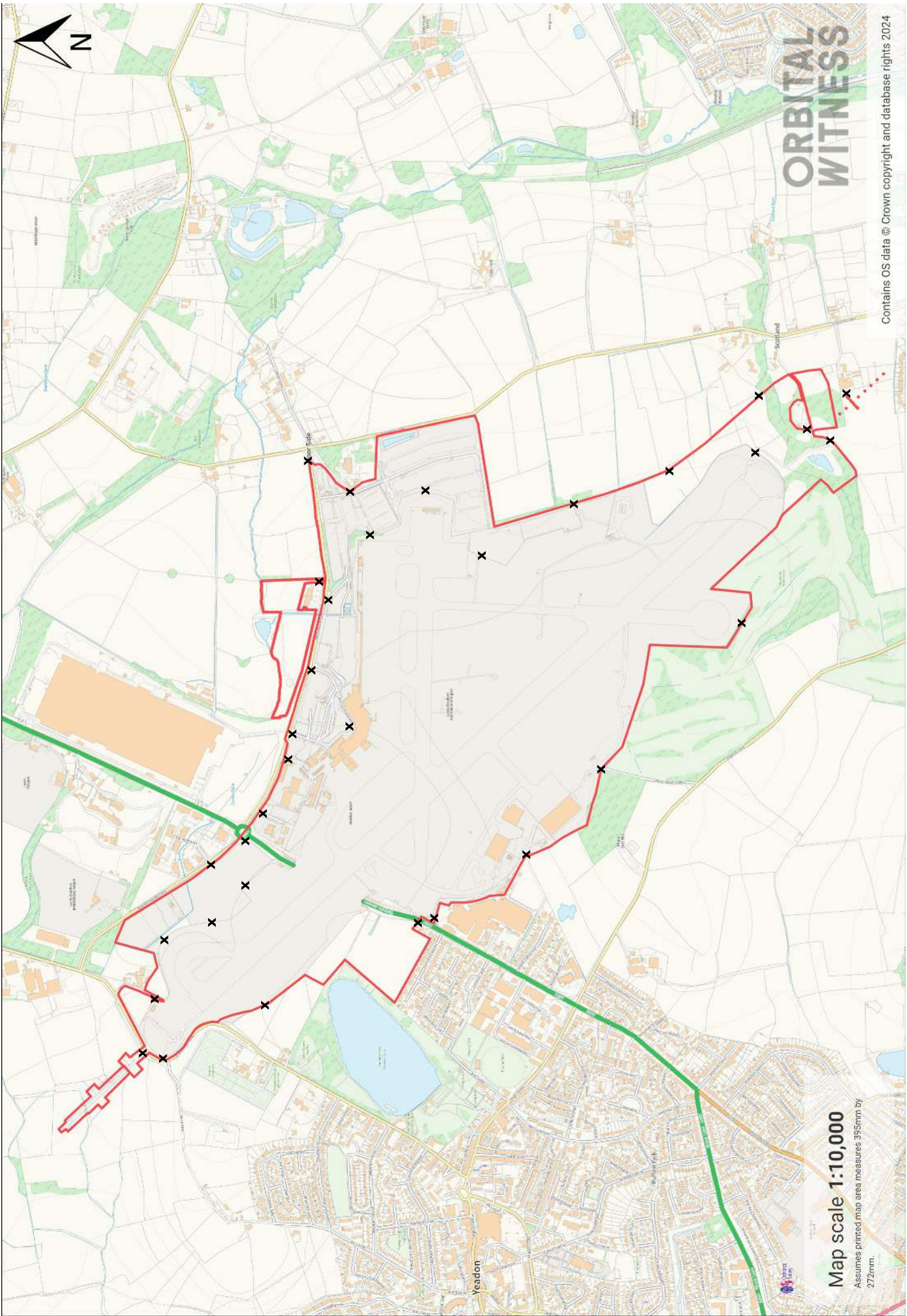
PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW5

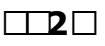
This is the exhibit marked "AJW5" in the witness statement of Alexander James Wright.

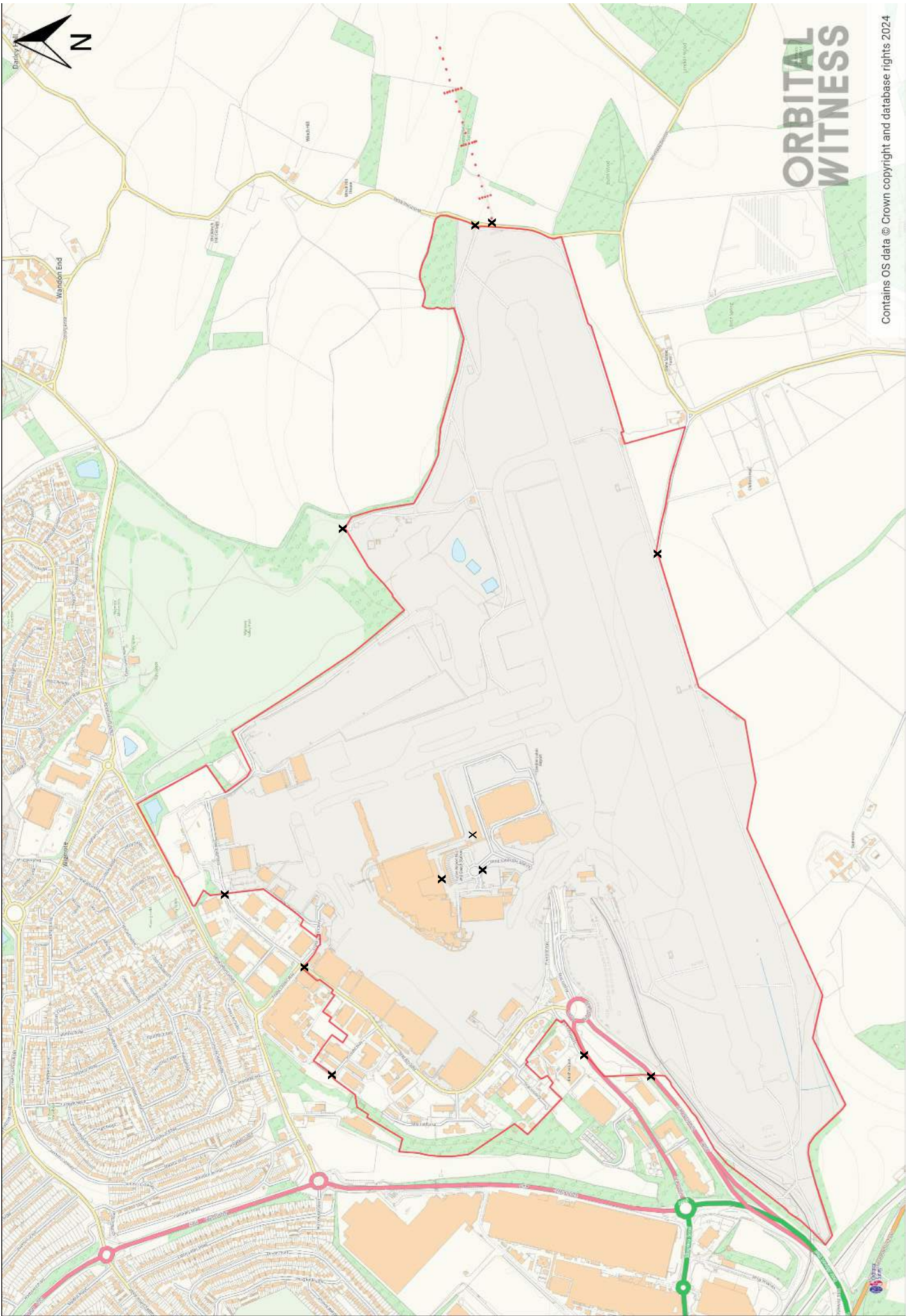


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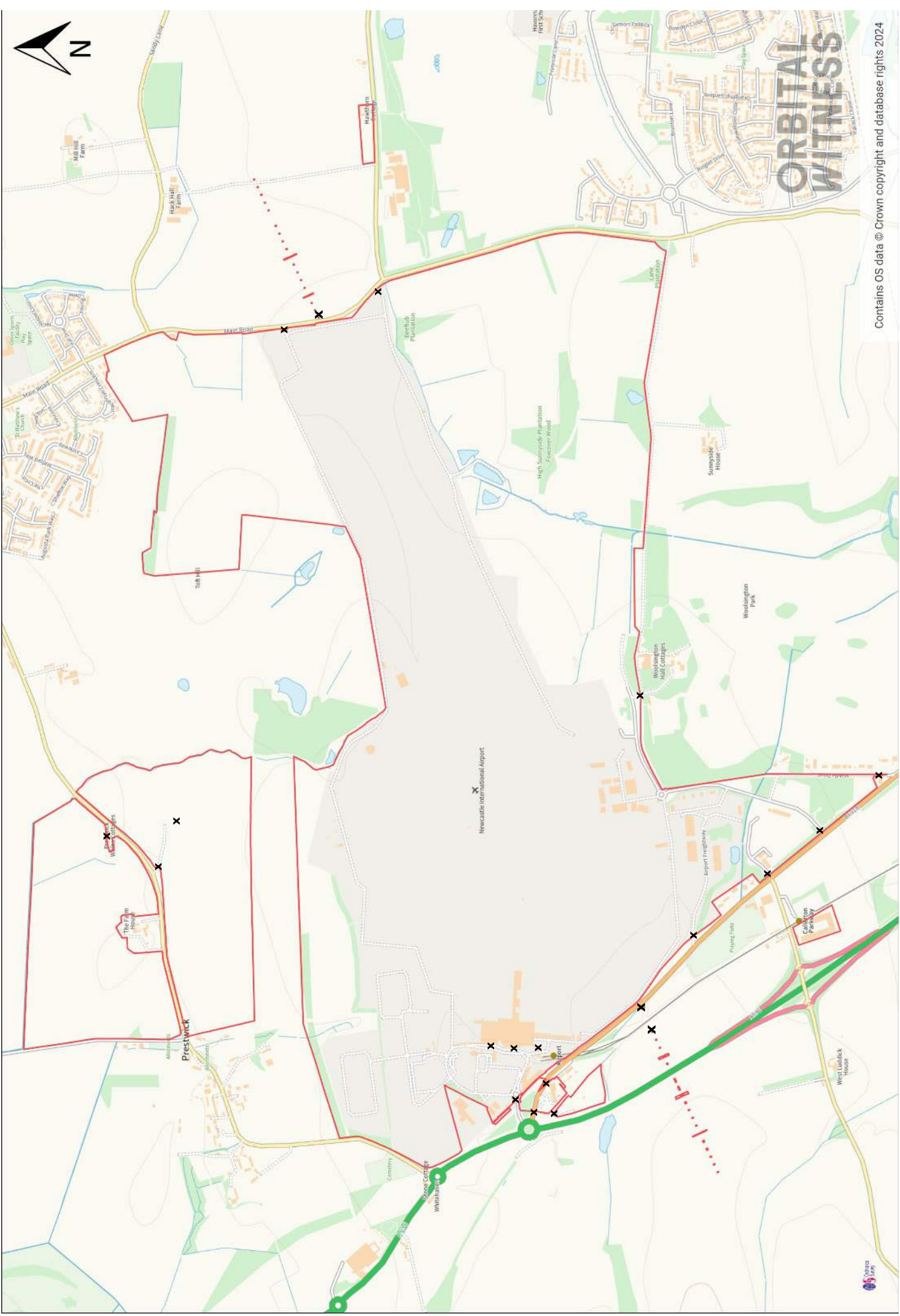
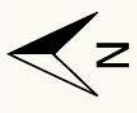
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ORBITAL WITNESS

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

- (1) LEEDS BRADFORD AIRPORT LIMITED
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- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
- (4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW6

This is the exhibit marked "AJW6" in the witness statement of Alexander James Wright.

Owen, Elin

From: Wright, Alexander
Sent: 09 June 2026 15:58
To: enquiries@extinctionrebellion.co.uk; juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com
Subject: Leeds Bradford Airport, London Luton Airport and Newcastle International Airport Injunction - Order from 2025 Review Hearing (24 June 2025)
Attachments: Leeds Bradford Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329804.1).pdf; London Luton Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329807.1).pdf; Newcastle International Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329809.1).pdf

To whom it may concern

We write further to the first review hearing heard by Bourne J on 24 June 2025 (“**the First Review Hearing**”) in respect of the injunctions granted in these proceedings by Order dated 19 July 2024 by Ritchie J.

We attach a copy of the Order of Bourne J from the First Review Hearing by way of service on you.

The precise terms of each order can be viewed from the webpage address referred to in the table below, at which copies of all applicable documents can be viewed also.

Airport	Action Number	Webpage address
Leeds Bradford Airport	KB-2024-2317	Injunction Leeds Bradford Airport
London Luton Airport		Injunction London Luton Airport
Newcastle International Airport		Injunction

Regards

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

T: +44 161 831 8582

M: +44 7500 578 620

www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland

Helping our clients, our people and our communities to thrive

Owen, Elin

From: Wright, Alexander
Sent: 09 June 2026 16:02
To: enquiries@extinctionrebellion.uk
Subject: Leeds Bradford Airport, London Luton Airport and Newcastle International Airport Injunction - Order from 2025 Review Hearing (24 June 2025)
Attachments: Leeds Bradford Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329804.1).pdf; London Luton Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329807.1).pdf; Newcastle International Airport - Injunction Review Hearing Order 2025 (Bourne J 24.06.25)(252329809.1).pdf

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London Luton Airport		Injunction London Luton Airport
Newcastle International Airport		Injunction

Regards

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

T: +44 161 831 8582

M: +44 7500 578 620

www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

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Helping our clients, our people and our communities to thrive

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
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- (4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

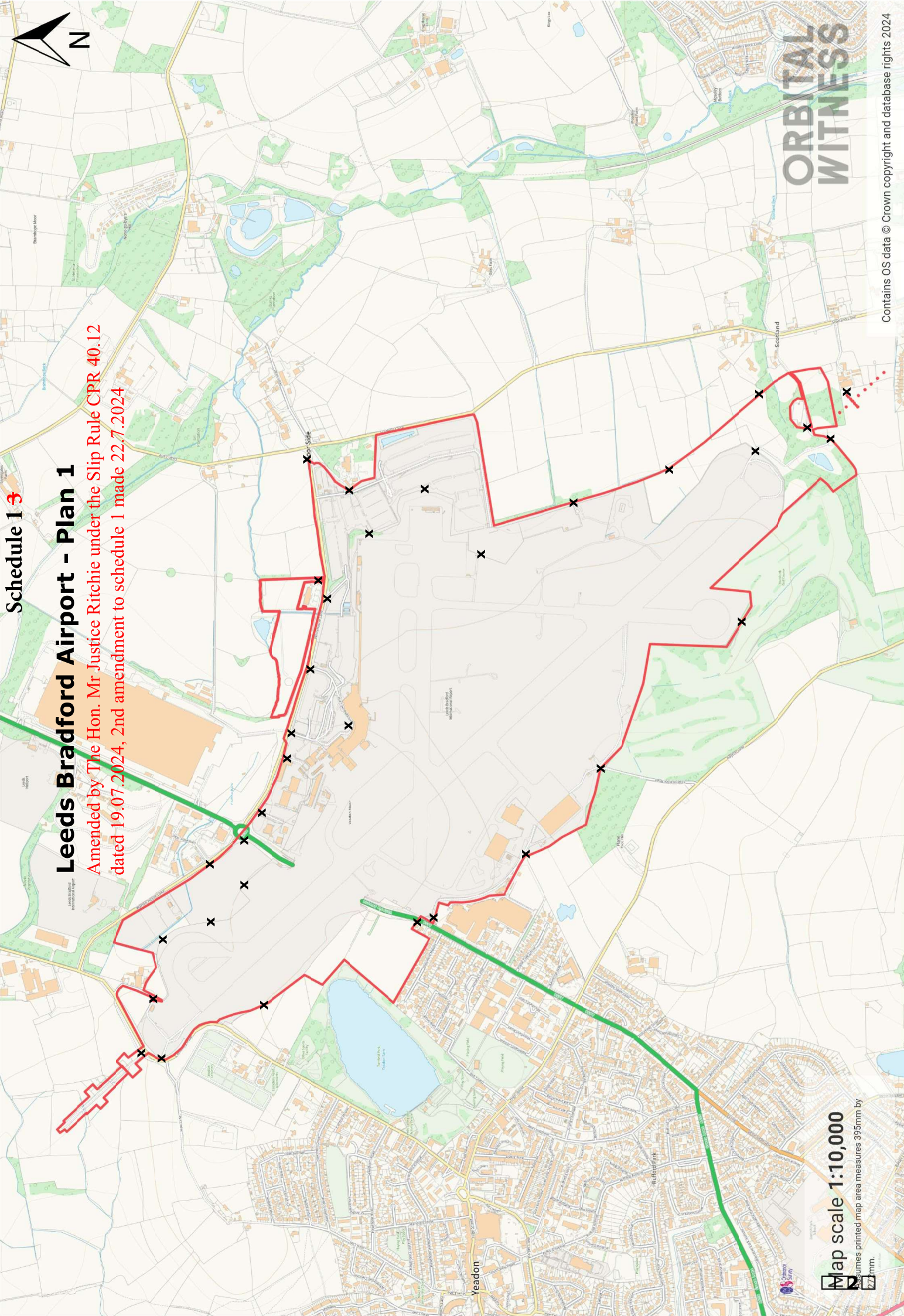
AJW7

This is the exhibit marked "AJW7" in the witness statement of Alexander James Wright.

Schedule 13

Leeds Bradford Airport - Plan 1

Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024



ORBITAL WITNESS

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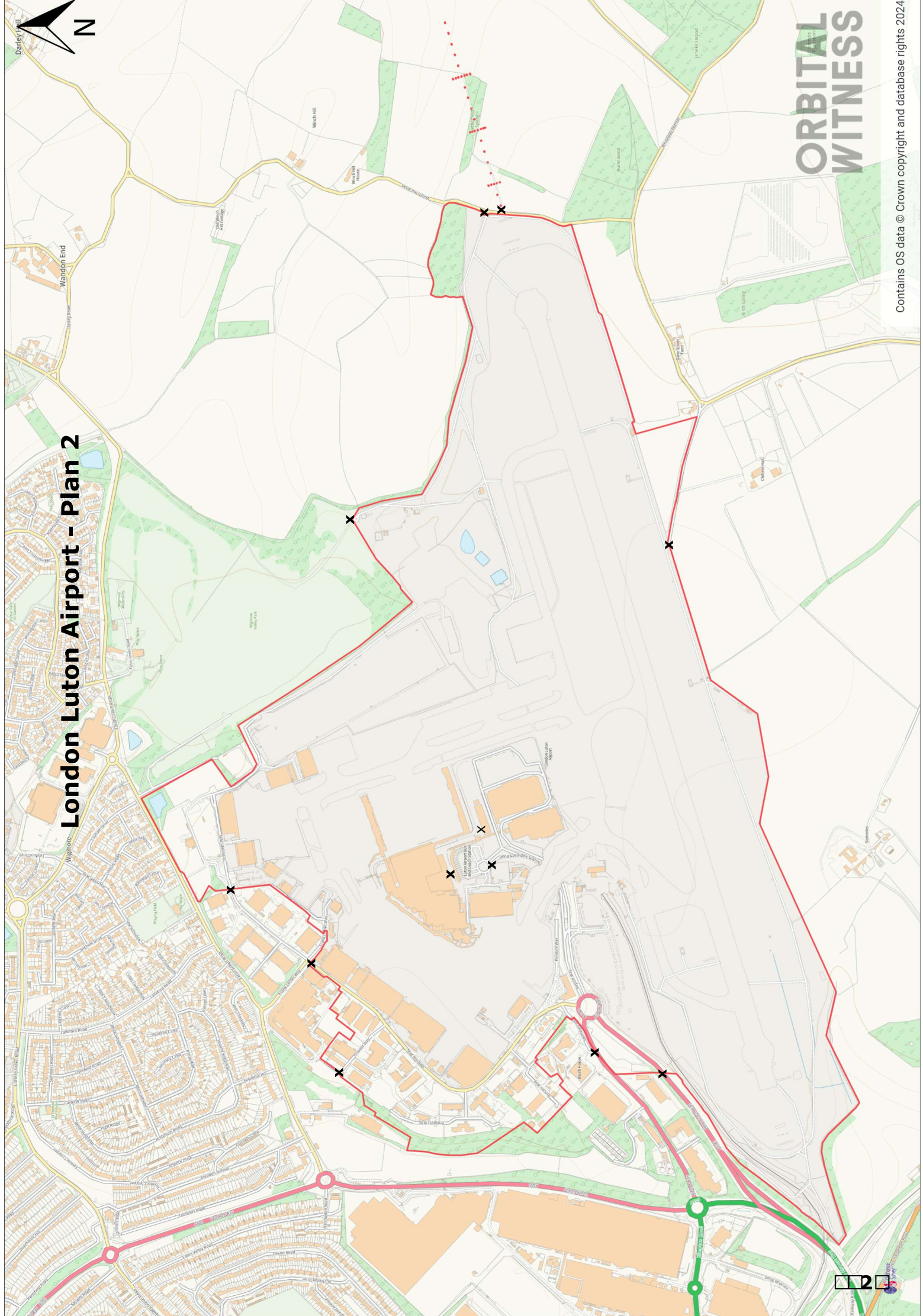
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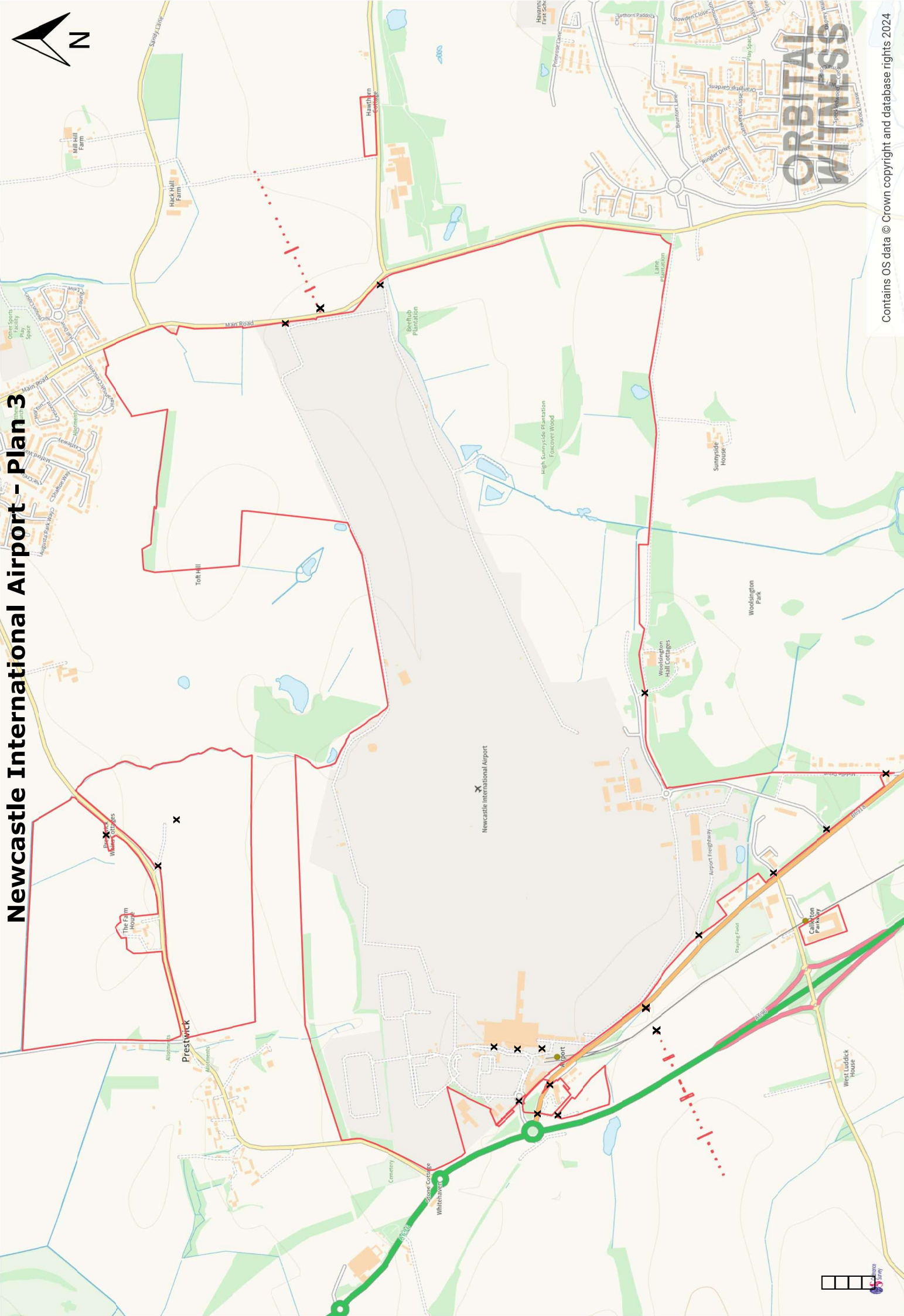


London Luton Airport - Plan 2



**ORBITAL
WITNESS**

Newcastle International Airport - Plan 3



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

- (1) LEEDS BRADFORD AIRPORT LIMITED
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- (4) NIAL SERVICES LIMITED

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW8

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

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LONDON LUTON AIRPORT BYELAWS

July 2025

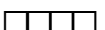
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LONDON LUTON AIRPORT OPERATIONS LIMITED

BYELAWS 2025

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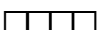
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London Luton Airport Operations Limited, in exercise of the powers conferred on it by sections 63 and 64 of the Airports Act 1986, and in accordance with all other requirements, approvals and powers enabling it in that regard hereby makes the following byelaws which shall apply within the Airport.

PART 1 DEFINITIONS, INTERPRETATION AND APPLICATION

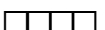
1.1 In these byelaws the following words shall have the following meanings:

- 1.1.1 **“Aeronautical Information Publication”** means the publication issued or otherwise made available by the United Kingdom’s en-route air navigation service provider which sets out aeronautical information essential to air navigation in the United Kingdom;
- 1.1.2 **“Aircraft”** means a heavier than air power driven flying machine and includes, but is not limited to, aeroplane (land plane), aeroplane (seaplane), aeroplane (amphibian), aeroplane (self-launching motor glider), powered lift (tilt rotor) and rotorcraft (helicopter and gyroplane);
- 1.1.3 **“Aircraft Operator”** means in relation to any Aircraft the person who at the relevant time manages the operations of that Aircraft;
- 1.1.4 **“Aircraft Passenger”** means a person attending, or intending to attend, the Airport for the purpose of being carried on board an Aircraft which undertakes a flight that departs from, or arrives at, the Airport (except if that person is a member of the flight crew or cabin staff operating that Aircraft);
- 1.1.5 **“Airport”** means the area constituting London Luton Airport shown edged in red on the map at Schedule 1 of these byelaws;
- 1.1.6 **“Airport Infrastructure”** means all buildings, structures, fixtures, fittings, services, cables, pipes, drains and other conduits, (whether portable or fixed) at the Airport including, but not limited to:
 - 1.1.6.1 radio and other navigational aids for the purpose of controlling, guiding or assisting the operation of Aircraft either at the Airport or serving the Airport;
 - 1.1.6.2 walls, fences, railings, gates and barriers;
 - 1.1.6.3 lighting columns and lights;
 - 1.1.6.4 car park cameras, pay machines and entry or exit barriers;
 - 1.1.6.5 road traffic, no-waiting and unloading signs and other wayfinding;
 - 1.1.6.6 parking infringement enforcement equipment including cameras, Vehicles, automatic number plate recognition systems, and other equipment used for such purposes;
 - 1.1.6.7 public seating;
 - 1.1.6.8 fittings and equipment within toilets to which the public have access;
 - 1.1.6.9 fire alarm, fire detection, fire prevention, and fire-fighting equipment;



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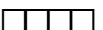
- 1.1.6.10 closed circuit television cameras;
- 1.1.6.11 baggage handling equipment;
- 1.1.6.12 x-ray machines, conveyor systems, and all other equipment used for the purposes of security;
- 1.1.6.13 any Vehicle used in connection with the operation of the Airport and any of its services or facilities;
- 1.1.6.14 doors, escalators, lifts, and conveyor belts;
- 1.1.6.15 telephone, radio, or other apparatus provided for transmitting and receiving messages;
- 1.1.6.16 check-in desk and boarding gate desk equipment; and
- 1.1.6.17 gas pipes, gas outlets, electric cables, fuse boxes and electric outlets;
- 1.1.7 **"Airport Equipment"** means all equipment, machinery, tools and Vehicles utilised by or on behalf of LLA, or another person, in connection with the operation of the Airport;
- 1.1.8 **"Airport Manager"** means a person employed or otherwise engaged by LLA as an "airport manager", or in a senior management or executive position, from time to time;
- 1.1.9 **"Airport Official"** means a person:
 - 1.1.9.1 employed or otherwise engaged by LLA, or by a contractor to LLA (including LLA's appointed air traffic controller), to work at the Airport from time to time;
 - 1.1.9.2 a person employed or otherwise engaged by Border Force or HM Revenue & Customs at the Airport from time to time; or
 - 1.1.9.3 a person otherwise authorised by LLA from time to time to act as an "airport official";
- 1.1.10 **"Airside"** means such parts of the Airport which are within the Security Perimeter from time to time, including those parts of a Public Terminal within the Security Perimeter and all gates, stands, aprons, taxiways and runways;
- 1.1.11 **"Airside Entrance Point"** means each part of the Airport as is designated by LLA from time to time (or a person authorised by LLA) for use as an entrance to an Airside location from a Landside location;
- 1.1.12 **"Airside Exit Point"** means each part of the Airport as is designated by LLA from time to time (or a person authorised by LLA) for use as an exit from an Airside location to a Landside location;
- 1.1.13 **"Animal"** means any animal, wild or domesticated, that is brought into the Airport;
- 1.1.14 **"Border Control Area"** each part of the Airport designated by LLA from time to time as a "border control area", including all areas in which border control and immigration checks



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and functions are undertaken by UK Border Force;

- 1.1.15 **“Car Park”** means any area of the Airport designated by LLA:
- 1.1.15.1 for use by the public to wait in, or park, Vehicles; or
 - 1.1.15.2 in which Vehicles are permitted to be used by the public to drop off or pick up any person;
- 1.1.16 **“Compliance Authority Identity Pass”** a valid and in date identification pass issued to a person who is categorised as Compliance Authority Personnel, which is issued in accordance with the requirements of Commission Implementing Regulation (EU) 2015/1998 of 5 November 2015 and the Single Consolidated Direction (Aviation) 2/2021;
- 1.1.17 **“Compliance Authority Personnel”** has the meaning set out in the Single Consolidated Direction (Aviation) 2/2021;
- 1.1.18 **“Constable”** means any person attested as such pursuant to section 29 of the Police Act 1996;
- 1.1.19 **“Crew Identity Pass”** a valid and in date crew identification pass issued to a member of crew working for an Aircraft operator operating at the Airport, which is issued in accordance with the requirements of Commission Implementing Regulation (EU) 2015/1998 of 5 November 2015 (and if the crew identification pass is issued by a UK registered airline, also in accordance with the Single Consolidated Direction (Aviation) 2/2021);
- 1.1.20 **“Customs Area”** each part of the Airport designated by LLA from time to time as a “customs area”, including all areas in which customs checks and functions are undertaken by HM Revenue & Customs;
- 1.1.21 **“Emergency Services”** means the police, security, military, fire and ambulance services;
- 1.1.22 **“Emergency Vehicle”** means any Vehicle in use for operational purposes by any of the Emergency Services;
- 1.1.23 **“Exempt Person”** means a person who at the then current time:
- 1.1.23.1 is an Aircraft Passenger;
 - 1.1.23.2 holds a Crew Identity Pass; or
 - 1.1.23.3 holds a Compliance Authority Identity Pass;
- 1.1.24 **“Exclusion Notice”** means a written notice directing that a person not enter the Airport during the Exclusion Period set out in that written notice;
- 1.1.25 **“Exclusion Period”** such period, which may be indefinite, during which a person may not enter the Airport in accordance with byelaw 19.5, as determined by the Airport Manager or Constable issuing the relevant Exclusion Notice in accordance with byelaw 19.3;
- 1.1.26 **“Hazardous Substance”** means any substance (whether solid, liquid or gaseous) which is:
- 1.1.26.1 capable of causing an actionable nuisance whether alone or in combination



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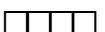
with one or more others; or

- 1.1.26.2 capable of polluting the environment or causing harm to human health, any living organism, ecosystem or property (including hydrocarbons);
- 1.1.27 “**ID Centre**” means the part of the Airport designated by LLA to be used in connection with the issue and collection of Identity Passes;
- 1.1.28 “**Identity Pass**” means a valid and in date Airport identification pass issued by LLA (or a person authorised by LLA) to the person identified on that identity pass;
- 1.1.29 “**Landside**” means such parts of the Airport which are not within the Security Perimeter from time to time;
- 1.1.30 “**LLA**” means London Luton Airport Operations Limited or its successors as operator of the Airport;
- 1.1.31 “**Lost Property Agent**” a person appointed by LLA to administer the collection and processing of Lost Property (and any other person engaged by that person to carry out such functions);
- 1.1.32 “**Lost Property**” means any item which is found on any part of the Airport operated by, or on behalf of, LLA, that is both unattended by a person who owns (or is otherwise in possession) of that item; and which does not have a proper purpose for being situated in the location in which it is found, but excluding:
 - 1.1.32.1 any Vehicle;
 - 1.1.32.2 any item found:
 - 1.1.32.2.1 on board an Aircraft,
 - 1.1.32.2.2 in a Vehicle not operated by or on behalf of LLA, or
 - 1.1.32.2.3 on premises sublet to another person; or
 - 1.1.32.3 any item that appears to have been thrown away, or otherwise discarded, as refuse;
- 1.1.33 “**Lost Property Office**” means the area designated by LLA for the collection of Lost Property;
- 1.1.34 “**Night**” means each period commencing at 23:00 on a day and ending at 07:00 on the following day;
- 1.1.35 “**NOTAM**” means a notice issued or otherwise made available by the United Kingdom’s en-route air navigation service provider containing information concerning the establishment, condition or change in any aeronautical facility, service, procedure or hazard concerned with flight operations;
- 1.1.36 “**Notice**” means any method or means (whether fixed or moveable) of conveying warnings, information, requirements, terms, restrictions or prohibitions of any description including signs, display screens, road markings and written communications, issued by or on behalf of LLA, an Airport Official or a Constable;



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- 1.1.37 **"Permission"** means the prior consent given by, or on behalf of, LLA (and such consent may include, where the context permits, permissions given verbally or in writing by Airport Officials, permissions set out in Notices, or consents or permission set out in agreements, permits, licences or leases entered into with, or issued by, LLA);
 - 1.1.38 **"Pilot"** in relation to an Aircraft means the member of the flight crew designated as commander of that Aircraft by the relevant Aircraft Operator, or, if there is no such person, the person who is at the then current time the pilot in command of that Aircraft;
 - 1.1.39 **"Private Hire Vehicle"** means a vehicle licensed by an appropriate licensing authority under section 48 of the Local Government (Miscellaneous Provisions) Act 1976 to be utilised as a private hire vehicle;
 - 1.1.40 **"Public Terminal"** means the building or buildings at the Airport operated by LLA from which Aircraft Passengers transfer to and from Aircraft;
 - 1.1.41 **"Regulator Standards"** means all standards, directions, rules, guidelines and codes (including "civil aviation publications") from time to time issued by the Civil Aviation Authority, UK Border Force, the Health and Safety Executive, the Department for Transport, and of any other relevant regulatory authority which apply to the operation of, or activities at, the Airport;
 - 1.1.42 **"Road Traffic Enactments"** has the same meaning as in section 63(3) of the Airports Act 1986;
 - 1.1.43 **"Security Area"** means each part of the Airport designated by LLA from time to time as a "security area", including all areas in which security screening and checking functions are undertaken by, or on behalf of, LLA;
 - 1.1.44 **"Security Perimeter"** means the security perimeter at the Airport (as designated by LLA) which separates Airside locations (including "critical parts") from Landside locations;
 - 1.1.45 **"Taxi"** means a hackney carriage licensed by the appropriate licensing authority under section 37 of the Town Police Clauses Act 1847 to be utilised to ply for hire within an area that includes the Airport; and
 - 1.1.46 **"Vehicle"** means any mechanically or manually propelled vehicle or machinery, or any wheeled apparatus designed to be towed by another vehicle, including cars, vans, lorries, mobile homes, mobile plant, caravans, motorbikes, scooters, bicycles and trailers.
- 1.2 These byelaws may be cited as the London Luton Airport Byelaws 2025.
- 1.3 These byelaws shall apply throughout the Airport, except to the extent otherwise set out in these byelaws.
- 1.4 In these byelaws:
- 1.4.1 the inclusion of a byelaw under a particular heading does not limit the scope of that byelaw to the subject matter of the heading; and
 - 1.4.2 in every case where a byelaw permits a person to commit an act or omission if Permission is granted to that person, it shall be a breach of that byelaw if that act is committed, or that



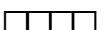
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omission occurs, contrary to the terms or extent of that Permission.

- 1.5 No provision in these byelaws shall apply to any Airport Official or any member of the Emergency Services when acting properly in the course of their duty, or to any Vehicle or Emergency Vehicle being used by any Airport Official or any member of the Emergency Services acting properly in the course of their duty.
- 1.6 In any proceedings concerning a defendant's contravention of these byelaws, it shall be a defence to prove that at the time of such contravention that the defendant:
 - 1.6.1 was an Airport Official or a member of the Emergency Services acting properly in the course of their duty; or
 - 1.6.2 was acting properly upon the instruction or with the authority of an Airport Official or a Constable.

PART 2 INTERFERENCE WITH AIRPORT INFRASTRUCTURE AND AIRPORT ACTIVITIES

- 2.1 No person, without Permission, shall operate, or interfere with, any Airport Infrastructure or Airport Equipment, or attempt to do so.
- 2.2 No person, without Permission, shall enter into any area in which construction works are being undertaken, or otherwise interfere with any construction works or attempt to do so.
- 2.3 No person shall damage, tamper with, intentionally or recklessly misuse, or intentionally or recklessly prevent the normal operation of, any Airport Infrastructure or Airport Equipment.
- 2.4 No person shall activate or use any alarm, emergency stop control switch or lever, emergency door release, fire-fighting equipment, or emergency equipment other than for a reasonable and proper purpose.
- 2.5 No person shall enter, attempt to enter or mount, or use any Airport Equipment or Airport Infrastructure, other than in the ordinary course of its use and for a reasonable and proper purpose.
- 2.6 No person shall operate or use any radio transmitter, or other thing capable of radiating or generating electrical interference, in such a way as to interfere with the operation of any Aircraft, Airport Infrastructure or Airport Equipment, other than with Permission (and only then, in the ordinary course of its use and for a reasonable and proper purpose).
- 2.7 No person, without Permission, shall undertake any works of construction, maintenance or repair to any Airport Infrastructure or Airport Equipment.
- 2.8 No person, without Permission, shall operate or use any item of Airport Infrastructure or Airport Equipment that that person knows, or ought reasonably to know, is in an unsafe condition.
- 2.9 No person shall take any baggage trolley, pushchair, wheelchair, or other mobility aid provided by LLA (or a person authorised by LLA) outside of the Airport, or leave or store any such item of equipment other than in a location designated by LLA (or a person authorised by LLA) for that purpose.
- 2.10 No person, without Permission, shall deface, displace, move, remove, or otherwise interfere with any Notice or advertisement.



- 2.11 No person, without Permission, shall operate, or cause to be operated, any vehicle, drone or aircraft which is unmanned (whether operated autonomously or controlled remotely).
- 2.12 No person, without Permission, shall climb any building, structure, wall, fence, barrier, railing, post, ladder or tower.
- 2.13 No person, without Permission, shall erect or place any structure, apparatus, container or equipment within three meters of the Security Perimeter.

PART 3 COMPLIANCE WITH THE PROPER FUNCTIONING OF THE AIRPORT

- 3.1 No person, without Permission, shall fail to comply with:
 - 3.1.1 any reasonable instruction given to them by an Airport Official or by a Constable in connection with the proper functioning of the Airport (including the operation of an Aircraft);
 - 3.1.2 all Regulator Standards; and
 - 3.1.3 all Notices which are applicable to that person, or the activities undertaken, or intended to be undertaken, by that person.
- 3.2 No person shall fail to state their correct name, address and purpose for being at the Airport upon request by an Airport Official or Constable.
- 3.3 No Aircraft Passenger shall fail to produce on demand to an Airport Official or Constable:
 - 3.3.1 proof of that Aircraft's Passenger's entitlement to be carried on board an Aircraft which is scheduled to undertake, or has undertaken, a flight that departs from, or arrives at, the Airport; and
 - 3.3.2 a form of photographic identification issued by a national authority confirming that Aircraft Passenger's identity.
- 3.4 No person shall fail to immediately evacuate a part of the Airport if:
 - 3.4.1 instructed to do so by an Airport Official, a member of the Emergency Services or by Notice; or
 - 3.4.2 if an alarm is sounded to evacuate that part of the Airport.
- 3.5 No person shall obstruct an Airport Official or a member of the Emergency Services from acting properly in the course of their duty.
- 3.6 No person shall fail to submit to a personal search, or to a search of their belongings, Vehicle, or any other item under their control, on demand by an Airport Official or Constable, if that Airport Official or Constable:
 - 3.6.1 has a reasonable suspicion that the individual is about to commit, has committed or is committing a criminal offence (including a breach of these byelaws); or
 - 3.6.2 that search is properly required to be undertaken by that Airport Official or Constable in the course of their duty.



- 3.7 No person (without lawful excuse) shall fail to immediately remove from the Airport a Vehicle, Animal, or item which has been brought into the Airport by that person:
- 3.7.1 if its presence is forbidden by Notice; or
 - 3.7.2 after having been instructed to remove it from the Airport by an Airport Official or a member of the Emergency Services.
- 3.8 No person (without lawful excuse) shall fail to immediately move a Vehicle, Animal or item brought into the Airport by that person, to such other part of the Airport as an Airport Official or member of the Emergency Services directs.

PART 4 RESTRICTED ACCESS

- 4.1 No person, without Permission, shall enter, or attempt to enter, an Airside location other than through an Airside Entrance Point (except if such entry occurs whilst being carried on board an Aircraft landing at the Airport).
- 4.2 No person, without Permission, shall exit, or attempt to exit, an Airside location other than through an Airside Exit Point (except if such exit occurs whilst being carried on board an Aircraft taking off from the Airport).
- 4.3 No person shall fail to submit themselves, or any items in their possession, for any properly conducted security checks, procedures or screening conducted by an Airport Official or a Constable.
- 4.4 No person, without Permission, shall enter or remain in an Airside location other than for a reasonable and proper purpose.
- 4.5 No person, without Permission, shall take an item into, or otherwise cause an item to enter or be left in, an Airside location, if that item, or type of item, is designated by LLA as being prohibited from being taken into, or otherwise entering, an Airside location.

PART 5 IDENTITY PASSES

- 5.1 LLA may at any time, at its discretion:
- 5.1.1 issue an Identity Pass to any person; or
 - 5.1.2 remove or revoke an Identity Pass issued to any person;
- and shall not be liable to any person for any loss or damage arising as a consequence of LLA's issue, removal or revocation of an Identity Pass in accordance with these byelaws.
- 5.2 No person (other than an Exempt Person) shall enter, remain or work in any Airside location, unless:
- 5.2.1 that person holds an Identity Pass which permits that person access to the relevant Airside location, or
 - 5.2.2 that person is escorted at all times by another person with an Identity Pass that permits that other person access to the relevant Airside location.
- 5.3 No person, without Permission, may escort another person in any Airside location.



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- 5.4 No person who holds an Identity Pass, Crew Identity Pass or Compliance Authority Identity Pass shall fail at all times to wear, each such pass at chest or shoulder height on outer clothing whilst present at the Airport.
- 5.5 No person, to the extent requested by an Airport Official or a Constable, shall fail to surrender or produce on demand an Identity Pass held by that person to that Airport Official or Constable.
- 5.6 No person who is issued with an Identity Pass shall fail to inform an Airport Official working in the ID Centre as soon as practicable if that Identity Pass is lost or stolen.
- 5.7 No person who is issued with an Identity Pass, without Permission, shall:
- 5.7.1 give that Identity Pass to any other person other than for a reasonable and proper purpose; or
 - 5.7.2 permit that Identity Pass to be used by any other person.

PART 6 ALCOHOL, DRUGS AND INTOXICATION

- 6.1 No person shall consume alcohol, or be in possession of any open alcohol container, in any public areas of the Airport, except in such parts of the Airport as are designated by LLA for the sale or consumption of alcohol.
- 6.2 No person shall consume or continue to consume alcohol, or take or continue to take any non-prescribed intoxicating drug, when requested by an Airport Official or a Constable to desist, provided that that Airport Official or Constable has reasonable cause to believe that such person is intoxicated.
- 6.3 No person who holds an Identity Pass, Crew Identity Pass or Compliance Authority Identity Pass, shall attend the Airport, or continue to remain at the Airport, in the course of performing their duties whilst intoxicated with a quantity of alcohol or drugs which causes them to be unfit to properly perform their duties.
- 6.4 No person who holds an Identity Pass, Crew Identity Pass or Compliance Authority Identity Pass, whilst attending the Airport in the course of their duties, shall fail to submit to a test for alcohol or drugs on demand by an Airport Official or Constable, if:
- 6.4.1 that Airport Official or Constable has a reasonable suspicion that that person has alcohol or a drug in their body and is unfit to properly perform their duties; or
 - 6.4.2 that person has been involved in an incident which caused, or gave rise to a danger of causing, injury to another person or damage to property.

PART 7 OFFENSIVE BEHAVIOUR

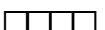
- 7.1 No person, without Permission, shall deface (whether by graffiti or otherwise) or damage any Airport Infrastructure, Airport Equipment, item, or any other property (including buildings, structures, fixtures, fittings, services, cables, pipes, drains and other conduits), equipment, machinery, tools or Vehicles which are owned by another person (other than with the consent of that owner).
- 7.2 No person shall use any language or make any gesture or commit any other act which is lewd, foul or offensive.

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- 7.3 No person shall conduct themselves in a disorderly manner or behave in a manner which causes or may cause undue distress or offence to any other person.
- 7.4 No person shall intentionally spit, urinate or defecate other than in a functioning toilet.
- 7.5 No person shall cause any other person to reasonably suspect, by any language or behaviour, by wearing any clothing or emblems, or carrying any signs or items, that there is a threat of:
- 7.5.1 terrorism (as defined by the Terrorism Act 2000) or other security threat at the Airport (including falsely asserting that that person or another person has in their possession an item which is prohibited by Notice from being taken Airside); or
 - 7.5.2 public protest, demonstration or procession (for which Permission has not been granted) or public disorder;
- if that person has no reasonable cause to believe that such threat exists.

PART 8 PROHIBITED BEHAVIOUR

- 8.1 No person, without Permission, shall leave baggage, or any other item, which that person has brought into the Airport or which is otherwise in that person's possession, unattended in any part of the Airport (unless it is left in an area designated for that purpose by LLA, or if it has been properly given over to the possession of another person).
- 8.2 No person, without Permission, shall enter, loiter on, frequent or remain at the Airport or any part of it other than for a reasonable and proper purpose.
- 8.3 No person, without Permission, shall walk on any grassed or cultivated area.
- 8.4 No person, without Permission, shall behave in such a way so as to endanger themselves or any other person.
- 8.5 No person, without Permission, shall walk on any part of the Airport which is not designated by LLA for pedestrian use (including any road other than in the proper course of using a pedestrian crossing point marked for that purpose).
- 8.6 No person, without Permission, shall sing, dance, shout, play a musical instrument or erect or use any apparatus for transmission, receipt, recording, reproduction or amplification of sound, speech or images.
- 8.7 No person, without Permission, shall engage in, or facilitate, gambling, betting, wagering, bookmaking or other similar activity.
- 8.8 No person, without Permission, shall organise or take part in any public assembly, protest, demonstration or procession.
- 8.9 No person, without Permission, shall:
- 8.9.1 display or erect any flags, banners, or signs; or
 - 8.9.2 wear or display any clothing, badges or emblems likely to cause harassment, alarm, distress or a breach of the peace.

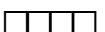


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- 8.10 No persons (without lawful excuse) shall fail to remove from the Airport any flags, banners, signs or emblems displayed or erected by that person at the Airport after being asked to undertake such removal by an Airport Official or a Constable.
- 8.11 No person, without Permission, shall take any photograph, or undertake any filming, live streaming, broadcast or recording activity in:
- 8.11.1 any area in the course of that person's trade or profession, for monetary reward, or for any other commercial or business purpose; or
 - 8.11.2 any part of a Security Area, Customs Area, or Border Control Area for any purpose.
- 8.12 No person, without Permission, shall fail to permanently erase from an item under their control any recording or image of:
- 8.12.1 any part of a Security Area, Customs Area or Border Control Area; or
 - 8.12.2 any Airport Official or Constable acting properly in the course of their duty;
- including on demand by an Airport Official or Constable.
- 8.13 No person, without Permission, shall distribute or display signs, advertisements, pamphlets, flyers, circulars or other printed or written matter.
- 8.14 No person, without Permission, shall undertake any market research for any purpose.
- 8.15 No person, without Permission, shall beg or solicit funds or contributions of any kind.
- 8.16 No person, without Permission, may enter a Car Park or any other part of the Airport, except for the purposes of:
- 8.16.1 parking a Vehicle in that Car Park;
 - 8.16.2 collecting a Vehicle from that Car Park; or
 - 8.16.3 picking up or dropping off a person using a Vehicle in that Car Park.
- 8.17 No person, without Permission, shall charge any device, equipment or Vehicle utilising the Airport Infrastructure.
- 8.18 No person, without Permission, shall:
- 8.18.1 erect, or sleep in, a tent, or sleep in any Vehicle (including any trailer or caravan); or
 - 8.18.2 sleep in any other part of the Airport (except for an Aircraft Passenger scheduled to depart the Airport on an Aircraft within the following 6 hours).
- 8.19 No person, without Permission, shall use skateboards, roller blades, roller skates, scooters or any similar device within a Public Terminal or any Airside area (except for mobility aids, mobility scooters and wheelchairs used by a person with reduced mobility).

PART 9 LITTER AND WASTE

- 9.1 No person, without Permission, shall drop or leave litter, waste or refuse except in a receptacle provided



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for the purpose.

- 9.2 No person, without Permission, shall place any waste or refuse container on any part of the Airport and, if with Permission, only then in a location designated by LLA for such purpose.
- 9.3 No person, without Permission, shall, deposit any construction waste or excavated materials.
- 9.4 No person, without Permission, shall use any open refuse containers (other than litter bins for the disposal of litter) or skips.
- 9.5 No person, without Permission, shall cause anything other than surface water to be discharged into the surface water drains.

PART 10 ANIMALS

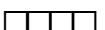
- 10.1 No person, without Permission, shall bring an Animal into a Public Terminal other than:
 - 10.1.1 assistance dogs;
 - 10.1.2 dogs under the control of an Airport Official or a member of the Emergency Services; or
 - 10.1.3 Animals which have been approved for travel by an Aircraft Operator or an Airport Official.
- 10.2 No person in charge of an Animal shall:
 - 10.2.1 fail to keep it under control, or permit it to foul on any part of the Airport (provided it shall be a defence for a person contravening this byelaw to demonstrate that they took all reasonable precautions and exercised all due diligence to avoid a contravention of this byelaw); or
 - 10.2.2 fail to remove from the Airport, or dispose of in an appropriate waste receptacle, any faeces defecated by that Animal at the Airport.
- 10.3 No person, without Permission, shall bring a horse on to the Airport, or otherwise ride or lead a horse at the Airport.
- 10.4 No person in charge of an Animal, without Permission, shall allow that Animal to graze.
- 10.5 No person, without Permission, shall interfere with, trap, remove, harm or damage any wild fauna or flora.

PART 11 UNAUTHORISED TRADE

- 11.1 No person, without Permission, shall conduct any business or any form of trading activity at the Airport (including offering for sale, selling or distributing goods or services).
- 11.2 No person, without Permission, shall personally solicit or tout for business at the Airport.

PART 12 SMOKING AND HAZARDOUS SUBSTANCES

- 12.1 No person shall smoke or use an electronic cigarette other than in an area designated by LLA for such purpose.
- 12.2 No person shall smoke in or otherwise bring into or light any naked flame or create sparks in:



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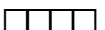
- 12.2.1 any place where any such act is prohibited by Notice;
- 12.2.2 any place within 15 metres of any Aircraft; or
- 12.2.3 any place where liquid fuel, gas, explosives or other highly flammable material is stored or used.
- 12.3 No person, without Permission, shall cause by any act or omission a fire to be lit.
- 12.4 No person, without Permission, shall fill or discharge liquid fuel, including in the course of refuelling any Vehicle or Aircraft, other than in a place designated for that purpose by LLA.
- 12.5 No person, without Permission, shall store, transport or handle any Hazardous Substance.
- 12.6 No person shall store, transport or handle any Hazardous Substance in a condition or manner likely to result in a discharge prohibited in accordance with byelaw 12.7.
- 12.7 No person, without Permission, shall cause or permit the discharge onto any surface of any:
 - 12.7.1 Hazardous Substance, or
 - 12.7.2 other substance of whatever nature which might obstruct or be or become a source of damage to drains, sewers or other Airport Infrastructure.
- 12.8 No person shall fail to adhere to any applicable safety requirements, including the use of suitable personal protective equipment, which they are directed to adhere to by an Airport Official, member of the Emergency Services or as out in any applicable Notice.

PART 13 PROHIBITED ACTS INVOLVING VEHICLES ON PARTS OF THE AIRPORT TO WHICH THE ROAD TRAFFIC ENACTMENTS DO NOT APPLY

- 13.1 No person in charge of a Vehicle, without Permission, shall on any part of the Airport to which the Road Traffic Enactments do not apply:
 - 13.1.1 drive a Vehicle if it would be unlawful for that person to drive that Vehicle on a road to which the Road Traffic Enactments do apply; or
 - 13.1.2 commit any act or omission whilst driving, parking or leaving that Vehicle which would be unlawful on a road to which the Road Traffic Enactments do apply.

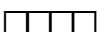
PART 14 PROHIBITED ACTS INVOLVING VEHICLES ON ALL PARTS OF THE AIRPORT

- 14.1 No person, without Permission, shall:
 - 14.1.1 wash any Vehicle other than in an area designated by LLA for such purpose; or
 - 14.1.2 undertake maintenance or repair work to any Vehicle.
- 14.2 A person in charge of a Vehicle which is not in a roadworthy condition or has broken down shall as soon as reasonably practicable procure that such Vehicle is removed from the Airport.
- 14.3 No person, without Permission, shall wait in, leave or park a Vehicle:
 - 14.3.1 within three metres of the Security Perimeter, except in a marked parking bay;



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- 14.3.2 within three metres of a Public Terminal, except in a marked parking bay; and
 - 14.3.3 other than in accordance with all applicable Notices.
- 14.4 No person, without Permission, in charge of a Vehicle shall:
- 14.4.1 bring that Vehicle into the Airport if it is in an unsafe condition;
 - 14.4.2 park or leave that Vehicle:
 - 14.4.2.1 in any part of the Airport, other than in a part of the Airport in which that type of Vehicle is permitted to be parked or left in accordance with one or more applicable Notices;
 - 14.4.2.2 other than in a marked parking space or in accordance with any applicable Notice; or
 - 14.4.2.3 in an unsafe condition, or in such a way so as to create or likely to create a hazard or obstruction to other persons or Vehicles, an impairment to the operation of the Airport or a risk to the security of the Airport; or
 - 14.4.3 permanently abandon that Vehicle;
 - 14.4.4 drop off passengers from that Vehicle, other than in a part of the Airport in which that type of Vehicle is permitted to be used to drop-off passengers in accordance with one or more applicable Notices;
 - 14.4.5 pick-up passengers with that Vehicle, other than in a part of the Airport in which that type of Vehicle is permitted to be used to pick-up passengers in accordance with one or more applicable Notices; or
 - 14.4.6 drive that Vehicle, other than on a road to which the public has access or a part of the Airport in which that type of Vehicle is permitted to be driven in accordance with one or more applicable Notices.
- 14.5 Where an incident occurs which involves damage to a Vehicle, or a Vehicle causing injury to another person or damage to other property, if present at the time of that incident the person in charge of that Vehicle, and any other person involved in the incident, shall stop and give:
- 14.5.1 their name and address;
 - 14.5.2 details of the incident; and
 - 14.5.3 if that person is the person in charge of that Vehicle:
 - 14.5.3.1 the name and address of the person who was the owner of the Vehicle at the time of the incident; and
 - 14.5.3.2 the vehicle registration number of that Vehicle;
- to an Airport Official or a Constable, as soon as practicable after the incident.
- 14.6 No person in charge of a Vehicle shall fail to produce to an Airport Official or a Constable, within seven



days of demand, details of the insurance for the operation of that Vehicle which is required to be in place in accordance with the Road Traffic Enactments.

- 14.7 No person in charge of a Vehicle shall fail to control or park that Vehicle other than in accordance with any applicable Notice, or a direction given by an Airport Official or a Constable.

PART 15 LAWFUL REMOVAL OF VEHICLES FROM THE AIRPORT

- 15.1 For the purposes of Section 54 of the Protection of Freedoms Act 2012, any Airport Official or Constable has authority, conferred by these byelaws, to move a Vehicle by any means if that Vehicle is:

15.1.1 situated in an area where that type of Vehicle is not permitted to be parked or left in, in accordance with one or more applicable Notices;

15.1.2 left in a manner (including outside of marked parking bay) contrary to any applicable Notices;

15.1.3 in the reasonable opinion of an Airport Official or Constable, is in an unsafe condition or creates or likely to creates a hazard or obstruction to other persons or Vehicles, an impairment to the operation of the Airport or a risk to the security of the Airport; or

15.1.4 in the reasonable opinion of any Airport Official or Constable has been permanently abandoned.

PART 16 TAXIS & PRIVATE HIRE VEHICLES

- 16.1 No person, without Permission, shall offer a Vehicle (including a Taxi or Private Hire Vehicle) for hire to another person at the Airport.

- 16.2 No person in charge of a Taxi or Private Hire Vehicle, without Permission, shall use that Vehicle to drop off passengers from that Vehicle, or pick-up passengers with that Vehicle.

- 16.3 No person in charge of a Vehicle, may:

16.3.1 permit that Vehicle to be used as a Taxi without that person holding a licence issued by an appropriate public authority which lawfully permits that person to operate that Vehicle as a Taxi within the area in which the Airport is situated; or

16.3.2 permit that Vehicle to be used as a Private Hire Vehicle without that person holding a licence issued by an appropriate public authority which lawfully permits that person to operate that Vehicle as a Private Hire Vehicle within the area in which the Airport is situated.

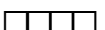
PART 17 AIRSIDE OPERATIONS

- 17.1 No person, other than an Aircraft Passenger (whilst being escorted by a person holding an Identity Pass), shall enter or remain in any outdoor area located Airside without wearing a high-visibility vest or jacket at all times.

- 17.2 No person, without Permission, shall drive a Vehicle in an Airside area without:

17.2.1 a reasonable and proper purpose for doing so;

17.2.2 holding an airside driving permit, issued by or on behalf of LLA, which permits that person



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to drive a Vehicle in that Airside area; and

- 17.2.3 an airside vehicle permit having been issued by or on behalf of LLA in respect of that Vehicle, which permits that Vehicle to be driven in that Airside area.
- 17.3 No person in charge of a Vehicle being driven in an Airside area, shall fail to produce on demand to an Airport Official or a Constable:
 - 17.3.1 airside driving permit, issued by or on behalf of LLA to that person; or
 - 17.3.2 an airside vehicle permit which has been issued by or on behalf of LLA in respect of that Vehicle.
- 17.4 No person shall pass on foot or drive a Vehicle within close proximity to the rear of an Aircraft while it is displaying collision lights indicating that it is about to be pushed back.
- 17.5 No person shall loiter near, or climb upon, or enter any Aircraft, or attempt to do so, without Permission, lawful authority, or the permission of the Pilot of that Aircraft.
- 17.6 No person shall deliberately damage any Aircraft, without Permission, lawful authority, or the permission of the owner of that Aircraft.
- 17.7 No person shall tamper with any Aircraft or do anything that causes, or is likely to cause, damage to or interference with the safe running or security of any Aircraft.
- 17.8 No person, without Permission, shall:
 - 17.8.1 move an Aircraft; or
 - 17.8.2 park an Aircraft in a location, other than a location allocated by an Airport Official for that Aircraft to be parked (except in an emergency).
- 17.9 No person in charge of an Aircraft shall fail to ensure that whilst that Aircraft is parked, it is chocked properly, or otherwise properly secured, so that it remains stationary.
- 17.10 No person, without Permission, shall fuel, service, de-ice or maintain an Aircraft, Vehicle or other equipment.
- 17.11 No person, without Permission, shall run or test an Aircraft engine.
- 17.12 No person, without Permission, shall cause or permit the obstruction of the passage of a Vehicle used for the purposes of refuelling an Aircraft.
- 17.13 No person, without Permission, shall cause or permit the obstruction of the passage of an Aircraft.
- 17.14 No person, to the extent it is applicable to that person, shall fail to comply with any requirement, procedure, restriction or regulation set out in the Aeronautical Information Publication or any NOTAM which relates to the Airport, or the operation of Aircraft in and around the Airport.
- 17.15 Where an incident occurs which involves damage to an Aircraft, or an Aircraft causing injury to another person or damage to other property, if present at the time of that incident the Pilot of that Aircraft (or, if the Aircraft is being towed, the tug-driver), and any other person involved in the incident, shall stop and give:



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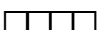
- 17.15.1 their name and address;
- 17.15.2 details of that incident; and
- 17.15.3 if that person is the Pilot:
 - 17.15.3.1 the name and address of the person who was the Aircraft Operator at the time of the incident; and
 - 17.15.3.2 the identification marks of the Aircraft;

to an Airport Official or a Constable, as soon as practicable after the incident.

- 17.16 No person shall leave an item in any Airside location which may damage, or interfere with the operation of, any Aircraft, Airport Infrastructure or Airport Equipment, other than in the ordinary course of its use and for a reasonable and proper purpose.

PART 18 LOST PROPERTY

- 18.1 Except as required by any other applicable law (including in respect of customs and excise), a person who finds, or otherwise comes into possession of, Lost Property shall as soon as practicable, either:
 - 18.1.1 hand it to any person reasonably claiming to be the owner of that Lost Property, or inform that person where it is located;
 - 18.1.2 hand it to an Airport Official or Lost Property Agent, and inform that Airport Official or Lost Property Agent of the state and circumstances in which that Lost Property was found or otherwise came into their possession; or
 - 18.1.3 inform an Airport Official where it is located.
- 18.2 Where any Lost Property is, or is contained in, a package, bag or other receptacle, an Airport Official, Lost Property Agent or Constable may cause such receptacle to be opened and the contents examined for the purposes of:
 - 18.2.1 identifying and tracing the owner of the Lost Property;
 - 18.2.2 ascertaining the nature of the contents; or
 - 18.2.3 any other reasonable purpose.
- 18.3 All Lost Property handed to an Airport Official or Lost Property Agent shall be retained in safe custody by LLA (or a Lost Property Agent acting on its behalf) for a period of at least two months from the date on which LLA (or a Lost Property Agent acting on its behalf) first came into possession of that Lost Property, except:
 - 18.3.1 if collected by, or delivered to, the owner of that Lost Property at an earlier time in accordance with these byelaws;
 - 18.3.2 for Lost Property that LLA (or a Lost Property Agent acting on its behalf) reasonably considers to be relevant to the commission or intended commission of a criminal offence (including a breach of these byelaws), which LLA (or a Lost Property Agent acting on its behalf) may hand over to the police or an appropriate government agency at any time;



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18.3.3 for Lost Property that is in the form of an official document, including but not limited to a driving licence or passport, which LLA (or a Lost Property Agent acting on its behalf) may hand over to the police or to the appropriate government department, local authority or other body or person responsible for issuing it or for controlling or dealing with it at any time;

18.3.4 for Lost Property that:

18.3.4.1 is perishable;

18.3.4.2 is, or contains, a Hazardous Substance;

18.3.4.3 is of negligible value;

18.3.4.4 may reasonably be considered to have been deliberately and permanently abandoned; or

18.3.4.5 is of a size or quantity which cannot be safely or adequately stored in the Lost Property Office;

which LLA (or a Lost Property Agent acting on its behalf) may sell, donate to charity, or otherwise dispose of as LLA (or a Lost Property Agent acting on its behalf) may think fit at any time.

18.4 If a person:

18.4.1 satisfies LLA (or a Lost Property Agent acting on its behalf) that they are the owner of Lost Property held by LLA (or a Lost Property Agent acting on its behalf); and

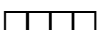
18.4.2 pays such charges as LLA (or a Lost Property Agent acting on its behalf) specify in respect of the storing, handling, and administration of the Lost Property and its return to that person;

then LLA (or a Lost Property Agent acting on its behalf) shall make that Lost Property available for collection to that person at the Lost Property Office for a period of at least two months from the date on which LLA (or a Lost Property Agent acting on its behalf) first came into possession of that Lost Property, or deliver that Lost Property to that person, by such means and to such address as LLA (or a Lost Property Agent acting on its behalf) may otherwise agree with that person.

18.5 LLA (or a Lost Property Agent acting on its behalf) shall not be required to identify or to trace the owner of Lost Property, except if the name and address of the owner of that Lost Property is readily ascertainable on the face of that Lost Property, in which case LLA (or a Lost Property Agent acting on its behalf) shall attempt to contact the owner of that Lost Property to inform them that the Lost Property is being held by LLA (or a Lost Property Agent acting on its behalf) and may be collected (or delivered) in accordance with these byelaws.

18.6 LLA (or a Lost Property Agent acting on its behalf) shall keep for a period of not less than twelve months a record showing particulars of the Lost Property, the circumstances in which it was found and recording the ultimate return or disposal of the Lost Property.

18.7 LLA (or a Lost Property Agent acting on its behalf) will not be liable to the owner of Lost Property for any loss of, or damage to, that Lost Property, arising as a consequence of:



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- 18.7.1 LLA (or a Lost Property Agent acting on its behalf) selling, donating, or otherwise disposing of that Lost Property in accordance with these byelaws;
 - 18.7.2 LLA (or a Lost Property Agent acting on its behalf) handing over or delivering that Lost Property to another person claiming to be the lawful owner of that Lost Property, as long as LLA (or a Lost Property Agent acting on its behalf) acted in good faith and had reasonable grounds to believe that that other person was the lawful owner of that Lost Property;
 - 18.7.3 that Lost Property being damaged in the course of another person delivering it to an address which the owner of the Lost Property has requested it be delivered to, or a failure by another person to deliver that Lost Property to that address;
 - 18.7.4 that item of Lost Property perishing whilst being held by LLA (or a Lost Property Agent acting on its behalf); or
 - 18.7.5 the movement or storage of that item of Lost Property, if that item of Lost Property requires specialist equipment or careful handling to avoid loss or damage to that Lost Property whilst it is being moved or stored.
- 18.8 Any unclaimed Lost Property held by LLA (or a Lost Property Agent acting on its behalf) for more than two months, from the date on which LLA (or a Lost Property Agent acting on its behalf) first came into possession of that Lost Property, may be sold, donated to charity, or otherwise disposed of as LLA (or a Lost Property Agent acting on its behalf) may think fit, and any proceeds of sale obtained will first be applied towards the payment of LLA's (or a Lost Property Agent acting on its behalf) charges for the storage, handling and administration of the item of Lost Property concerned and the costs of disposal, and any surplus (if any) will be retained or distributed by LLA (or a Lost Property Agent acting on its behalf) as it thinks fit.

PART 19 AIRPORT EXCLUSION

- 19.1 An Airport Official or Constable may make an oral or written request to a person, for that person to leave the Airport and not return for a period of 24 hours from the time of that request, if that Airport Official or Constable has reasonable grounds to believe that that person has committed or intends to commit a criminal offence (including a breach of these byelaws).
- 19.2 No person, without Permission, shall fail to immediately leave the Airport, and not return for a period of at least 24 hours, if requested to do so by an Airport Official or Constable in accordance with byelaw 19.1.
- 19.3 An Airport Manager or Constable may issue an Exclusion Notice to a person, in accordance with byelaw 19.4, directing that that person may not enter or remain at the Airport during such reasonable Exclusion Period as is determined by that Airport Manager or Constable, if that Airport Manager or Constable has reasonable grounds to believe that that person has committed or intends to commit a criminal offence (including a breach of these byelaws).
- 19.4 An Airport Manager or a Constable may issue an Exclusion Notice to a person by either handing that Exclusion Notice to that person or by posting or leaving it at the last known residential address of that person.
- 19.5 No person issued with an Exclusion Notice in accordance with byelaw 19.4, without Permission, shall:

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- 19.5.1 if present at the Airport when issued with that Exclusion Notice, fail to immediately leave the Airport; or
- 19.5.2 enter the Airport at any time during the Exclusion Period set out in that Exclusion Notice.

PART 20 PENALTIES

- 20.1 Any person contravening any of the following byelaws shall be liable on summary conviction to a fine, which in respect of a contravention of:
 - 20.1.1 byelaw 2.9, 2.10, 5.4, 8.1, 8.2, 8.3, 8.5, 8.6, 8.7, 8.9, 8.13, 8.14, 8.15, 8.16, 8.17, 8.18, 9.1, 9.4, 10.2, 10.4, 10.5, 17.1, or 18.1 shall not exceed level 2 on the standard scale;
 - 20.1.2 byelaw 6.1, 6.2, 7.2, 8.8, 8.10, 8.19, 9.2, 9.3, 10.1, 10.3, 11.1, 11.2, 12.1, 14.1, 14.2, 14.6, 16.1, 16.2 or 16.3 shall not exceed level 3 on the standard scale; and
 - 20.1.3 byelaw 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 2.11, 2.12, 2.13, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 4.1, 4.2, 4.3, 4.4, 4.5, 5.2, 5.3, 5.5, 5.6, 5.7, 6.3, 6.4, 7.1, 7.3, 7.4, 7.5, 8.4, 8.11, 8.12, 9.5, 12.2, 12.3, 12.4, 12.5, 12.6, 12.7, 12.8, 13.1, 14.3, 14.4, 14.5, 14.7, 17.2, 17.3, 17.4, 17.5, 17.6, 17.7, 17.8, 17.9, 17.10, 17.11, 17.12, 17.13, 17.14, 17.15, 17.16, 19.2 or 19.5, shall not exceed level 4 on the standard scale¹

PART 21 REVOCATION OF EARLIER BYELAWS

- 21.1 The byelaws which were made by LLA under sections 63 and 64 of the Airports Act 1986 on 3 October 2005 and which were confirmed by the Secretary of State for Transport on 20 November 2005 are hereby revoked.

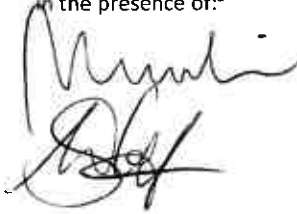
¹ As at the date of these byelaws the relevant levels of the standard scale are, by virtue of section 37(2) of the Criminal Justice Act 1982, as follows: Level 2 - £500, Level 3 - £1,000, Level 4 - £2,500. These levels are, however, subject to amendment from time to time by statute or by order made under section 143 of the Magistrates' Court Act 1980.



OFFICIAL

THE COMMON SEAL of LONDON LUTON AIRPORT
OPERATIONS LIMITED was hereunto affixed this

~~26~~ day of August 2025
in the presence of:



- Alberto Martin
Director

Mee-Ling Sheffington
Company Secretary



The foregoing byelaws are hereby confirmed by the Secretary of State for Transport and shall come into operation on 30th July 2025.

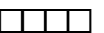
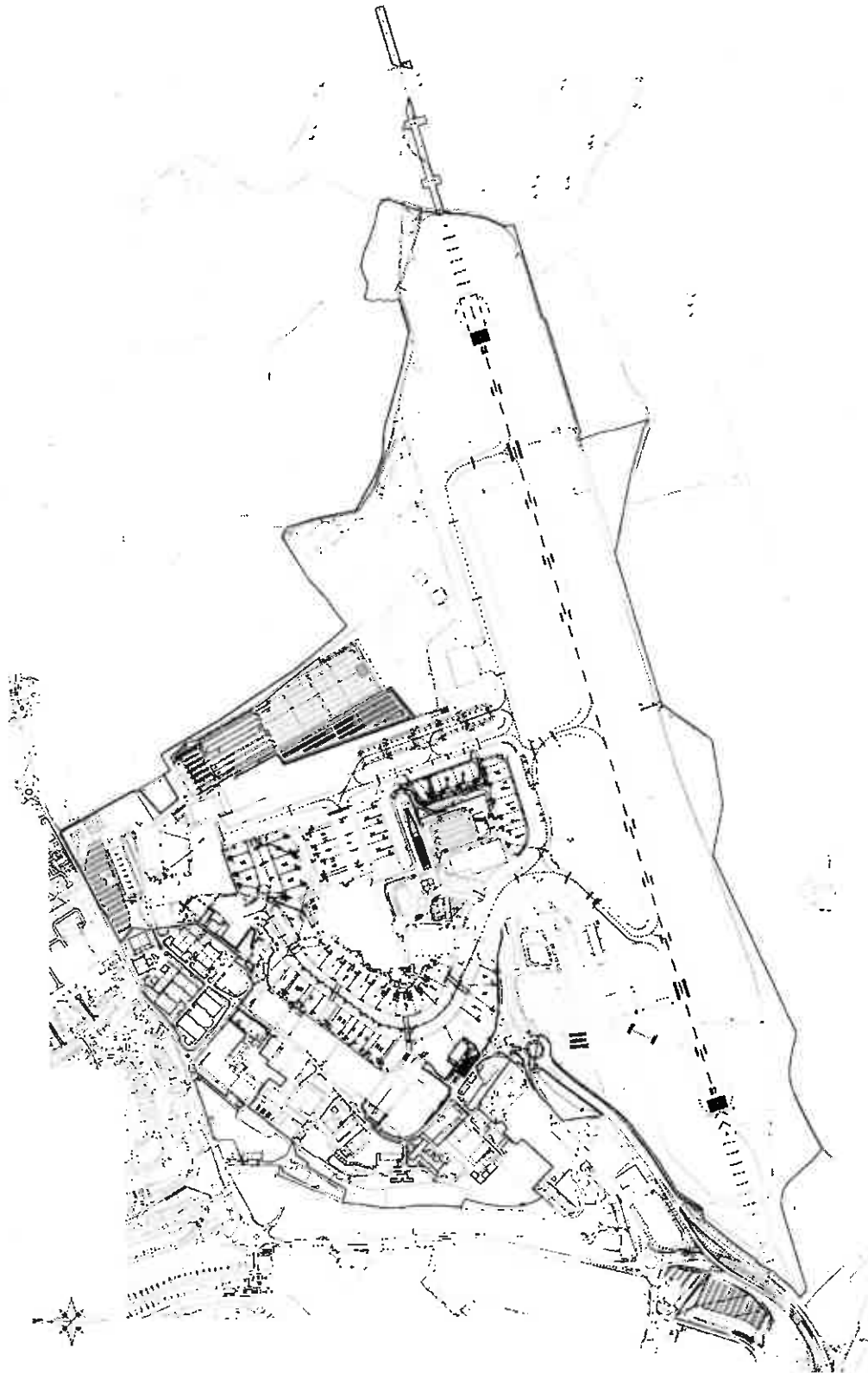
SIGNED BY



Michael Stark
Deputy Director,
Aviation - Commercial, Strategy and Sponsorship
by authority of the Secretary of State for Transport

30th July 2025

Schedule 1 - Map



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

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

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW9

This is the exhibit marked "AJW9" in the witness statement of Alexander James Wright.



Official copy of register of title

Title number BD230068

Edition date 04.11.2024

- This official copy shows the entries on the register of title on 14 MAR 2025 at 17:38:08.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 02 Jun 2026.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Peterborough Office.

A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

LUTON

- 1 (23.10.1992) The Leasehold land shown edged with red on the plan of the above Title filed at the Registry and being Hangar 60, Percival Way, London Luton Airport, Luton.
- 2 (23.10.1992) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:
 Date : 6 October 1992
 Term : 100 years from 24 April 1992
 Rent : As therein mentioned
 Parties : (1) London Luton Airport Limited
 (2) Monarch Aircraft Engineering Limited
NOTE: Copy filed under BD173594.
- 3 (23.10.1992) There are excepted from the effect of registration all estates, rights, interests, powers and remedies arising upon, or by reason of, any dealing made in breach of the prohibition or restriction against dealings therewith inter vivos contained in the Lease.
- 4 Unless otherwise mentioned the title includes any legal easements granted by the registered lease(s) but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (03.04.2024) PROPRIETOR: LONDON LUTON AIRPORT OPERATIONS LIMITED (Co. Regn. No. 03491213) of Percival House, 134 Percival Way, London Luton Airport, Luton LU2 9NU.

Title number BD230068

B: Proprietorship Register continued

2 (03.04.2024) The price stated to have been paid on 29 February 2024 was
£1,025,000 exclusive of VAT.

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

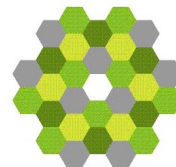
Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

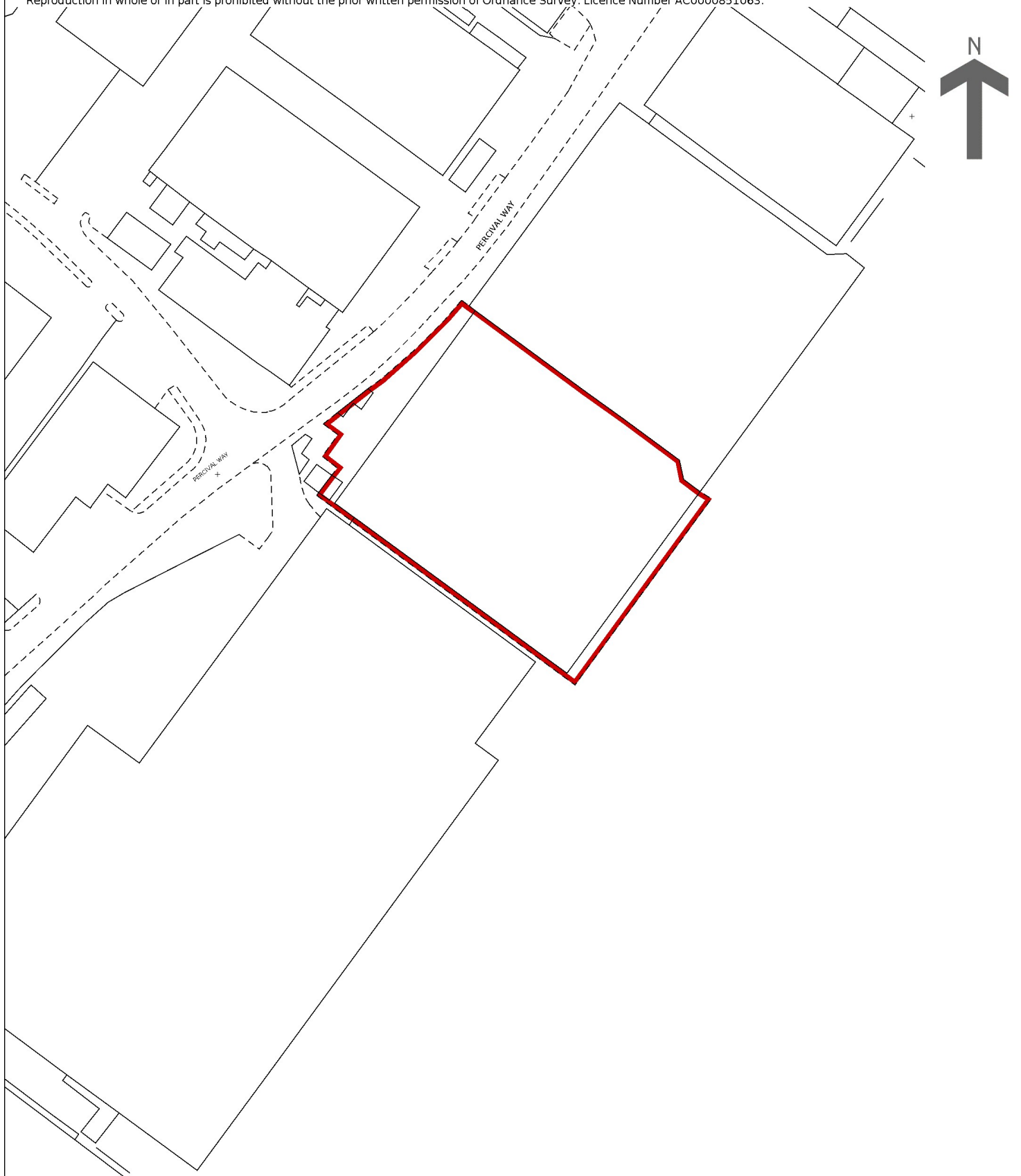
There is an/are application(s) pending in HM Land Registry and if we have only completed the mapping work for a pending application affecting the title concerned, such as a transfer of part:

- additional colour or other references, for example 'numbered 1', may appear on the title plan (or be referred to in the certificate of inspection in form CI), but may not yet be mentioned in the register
- colour or other references may also have been amended or removed from the title plan (or not be referred to in form CI), but this may not be reflected in the register at this stage.

This official copy is issued on 04 June 2026 shows the state of this title plan on 14 March 2025 at 17:38:08. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. This title is dealt with by the HM Land Registry, Peterborough Office .



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

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

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW10

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

- LTN 2005 Area
- LTN 2025 Areas



Area 3

Area 1

Area 2



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

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

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW11

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



Official copy of register of title

Title number HD544934

Edition date 10.07.2015

- This official copy shows the entries on the register of title on 03 JUN 2026 at 15:06:05.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 03 Jun 2026.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Leicester Office.

A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

HERTFORDSHIRE : NORTH HERTFORDSHIRE

- 1 (10.07.2015) The Leasehold land demised by the lease referred to below which lies within the area shown edged with red on the plan of the above Title filed at the Registry and being Landing lights lying to the east of Airport Way, London Luton Airport, Luton.
- 2 (10.07.2015) The land edged yellow on the title plan has the benefit of but is subject to all rights of way public or private or of water drainage light and other easements and rights of adjoining owners.
- 3 (10.07.2015) The land edged brown on the title plan land has the benefit of the rights reserved by but is subject to the rights granted by a Deed of Gift dated 26 October 1990 made between (1) The Honourable Richard Oakley Pleydell-Bouverie and (2) Gillian Margaret Victoria Pleydell-Bouverie.

NOTE:-No copy of the deed is held by Land Registry. But see the entry in the Charges Register referring to this deed.

- 4 (10.07.2015) The land has the benefit of the rights reserved by but is subject to the rights granted by a Deed of Grant dated 21 January 1991 made between (1) Robert William Smith and Mark Iain Tennant (Grantors) and (2) Fina plc.

NOTE: Copy filed under HD511283.

- 5 (10.07.2015) The land has the benefit of and is subject to the rights contained in a Transfer of the freehold estate in the land edged and numbered 1 & 2 in blue on the title plan and other land dated 5 April 2005 made between (1) Mark Iain Tennant and Andrew Leslie Pym and (2) Harriot Isobel Pleydell-Bouverie and Bartholemew Richard Pleydell-Bouverie.

NOTE:-Copy filed under HD442451.

- 6 (10.07.2015) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:
Date : 6 July 2015

A: Property Register continued

- Term : 21 years beginning on and including 7 February 2014 and ending on and including 6 February 2035
- Parties : (1) Gillian Margaret Victoria Pleydell-Bouverie
(2) Bartholomew Richard Pleydell-Bouverie and Harriot Isobel Pleydell-Bouverie
(3) Richard Oakley Pleydell-Bouverie
(4) London Luton Airport Operations Limited
- 7 (10.07.2015) The Lease prohibits or restricts alienation.
- 8 (10.07.2015) The land has the benefit of any legal easements granted by clause LR11.1 of the registered lease dated 6 July 2015 referred to above.
- 9 (10.07.2015) The landlord's title is registered.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (10.07.2015) PROPRIETOR: LONDON LUTON AIRPORT OPERATIONS LIMITED (Co. Regn. No. 3491213) of Navigation House, Airport Way, London Luton Airport, Luton LU2 9LY.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (10.07.2015) The land edged yellow on the title plan is subject to the following rights reserved by a Deed of Gift of the freehold estate in the land edged yellow on the title plan and other land dated 26 October 1990 made between (1) The Honourable Richard Oakley Pleydell-Bouverie and (2) Gillian Margaret Victoria Pleydell-Bouverie:-

EXCEPTING AND RESERVING the right set out in the Second Schedule hereto

THE SECOND SCHEDULE

(Rights excepted or reserved)

1. A right of way in fee simple to the Donor and his successors in title the owners and occupiers for the time being of all or any part of OS 0025 shown edged blue on the Plan annexed hereto and his servants and licensees going to or from OS 0025 or any part thereof full right and liberty from time to time and at all times hereafter and for all purposes to pass and repass with or without animals and vehicles across through and over OS 7218 and every part thereof.

NOTE: Copy plan filed under HD511407.

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

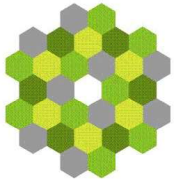
Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

This official copy is issued on 03 June 2026 shows the state of this title plan on 03 June 2026 at 15:06:51. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. This title is dealt with by the HM Land Registry, Leicester Office .

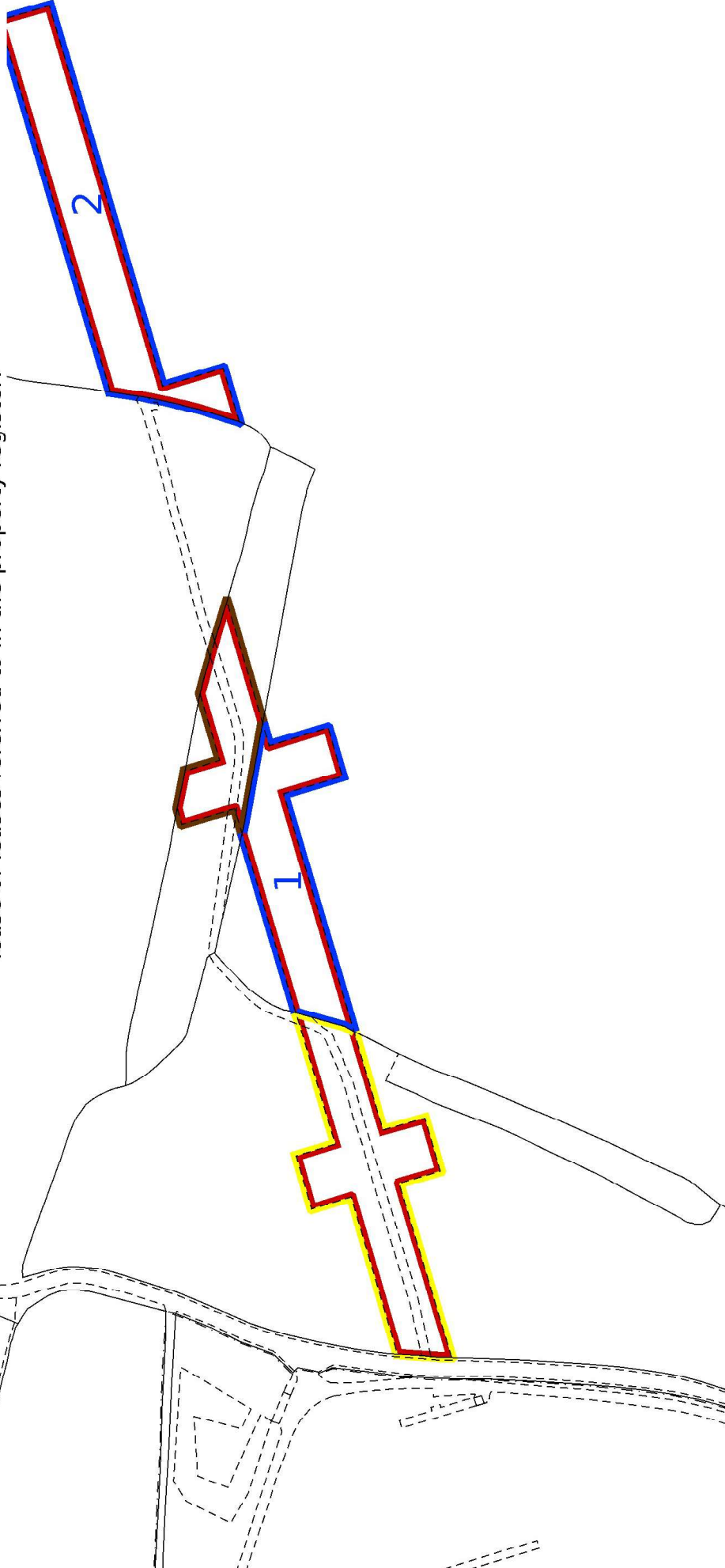
HM Land Registry
Official copy of
title plan

Title number **HD544934**
Ordnance Survey map reference **TL1321SE**
Scale **1:2500**
Administrative area **Hertfordshire : North**
Hertfordshire



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The land in this title lies within the area edged red hereon and is more particularly described in the lease or leases referred to in the property register.



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

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

Claimants

-and-

PERSONS UNKNOWN

AS MORE PARTICULARLY DESCRIBED IN THE AMENDED CLAIM FORM

Defendants

AJW12

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