

Leeds City Council approved and confirmed as lawful up to 941 additional night-time aircraft movements per year by quieter aircraft, a figure which is in line with movement numbers previously operated by the airport.

A spokesperson for the local authority explained: “The council, acting as the local planning authority for Leeds, has determined a CLEUD application submitted by Leeds Bradford Airport. This provides increased clarity on the airport’s operation regarding night-time flight numbers, which we are aware is a matter of local interest.

“Leeds Bradford Airport had asked the council to confirm that unlimited flights by these quieter aircraft during the night-time were lawful. The council did not agree to this.

“The 941 newly confirmed movements are in addition to the existing limits on night-time flights at the airport, which were established in a 2007 planning permission and are capped at 2,800 movements during British Summer Time and 1,200 during the winter season. Any additional night-time movements above the 941 figure will count towards these caps.”

Local residents previously joined GALBA members to protest in front of Leeds Civic Hall. | Gerard Binks

The CLEUD application, which sought to establish the lawfulness of take-offs and landings at the airport at night by certain types of aircraft, was **determined following a formal call for evidence by Leeds City Council.**

All flight data submitted by third parties was independently verified by the council and external sources. It is based on UK planning law and an assessment of the airport’s flight records over a 10-year period.

Under a condition of Leeds Bradford Airport’s planning permission in 2007, the night-time period is defined as running between 11pm and 7am each night. Any aircraft movements above the total capped movements would constitute a breach of planning permission and could be subject to enforcement action.

As part of the CLUED outcome, it was confirmed that the Yeadon-based airport **did not breach the movement limits governing night flights** during the 2023, 2024, and 2025 periods.

A spokesperson for Leeds Bradford Airport said: “We are pleased with the decision by Leeds City Council, which confirms our long-held position that LBA has operated responsibly and in full compliance with night flight regulations over the last three years. This decision provides much-needed certainty for our partners, our passengers, and the local community.

“LBA remains committed to being a responsible neighbour while continuing to serve as a vital economic gateway for the region.

“We look forward to continuing our constructive work with Leeds City Council to develop a sustainable long-term framework for flights that balances the region’s connectivity needs with our environmental and local commitments.”

It comes as LBA has embarked on LBA:REGEN, its most transformative period in decades including a **fundamental transformation and extension of the terminal building** and the launch of its new Together for Tomorrow sustainability strategy.

As part of its **Together for Tomorrow strategy**, LBA continues to work with airlines to deploy the latest generation of quieter, more fuel-efficient aircraft as part of its ongoing effort to modernise operations and reduce the noise footprint of its flight schedule.

City Council previously issued the airport with an **enforcement notice in September 2024** after they were found to have breached noise rules. Two of three subsequent appeals were dismissed.



REGION

Home > Business

# The people v Leeds Bradford Airport – a new chapter begins

Night flights ruled illegal by a public enquiry continue to operate but Leeds City Council could now take action to restore control



by **Nick Hodgkinson** — 30-04-2026 06:57 in **Business, Region** Reading Time: 6 mins read

AA





Group for Action on Leeds Bradford Airport (GALBA) protest outside Leeds Civic Hall calling on Leeds City Council to immediately stop unlimited, unauthorised night flights. Credit: Neil Terry Photography/ Alamy News Live

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**Leeds Bradford Airport (LBA) has submitted yet another planning application to increase nighttime flying. They want the airport's most frequently flown aircraft to be exempt from the cap on night flights. [The Group for Action on Leeds Bradford Airport \(GALBA\)](#) is opposing the application and thinks there's a simple way for Leeds City Council to put an end to the merry-go-round of planning applications.**

Long term readers will be familiar with the ongoing struggle between local campaigners, GALBA, and LBA. Since 2020, the airport has been looking for ways to increase its annual passenger numbers from 4.5 million to 7 million by 2030 and 10 million by 2045. And since 2020, GALBA has successfully stopped them.

LBA specifically wants to increase nighttime flying to maximise the number of return flights that can be made to the Med and back in the same day by airlines using LBA. Why? Because a plane on the ground isn't making money.

# GALBA wants to protect local people, air quality and the climate

GALBA strongly opposes expansion for three reasons: the [health risks](#) that additional night flights would pose to people who live (and try to sleep) under the flight path; the damage that would be done to local [air quality](#) from the rise in ultra-fine particles released by jet engines; and the increase in [greenhouse gas emissions](#) from extra flights, at a time when scientists warn that humanity is in the last chance saloon to prevent catastrophic climate breakdown.

As the Chair of GALBA, I feel the need to restate our aims because, over the years, these have been misunderstood – or even misrepresented – by some people. To be clear, GALBA does not say the airport should be closed down; nor do we say that people should never fly. We do say that LBA should not be allowed to expand, because the harms that would result far outweigh any benefit that might accrue.

Consistent with our stand on LBA, we also oppose all other proposed airport expansions, following the advice of the government’s expert advisers on the [Climate Change Committee](#).



ECONOMY

## The People v Leeds Bradford Airport – the conflict continues

BY NICK HODGKINSON ⌚ 1 OCTOBER 2025 - UPDATED ON 19 APRIL 2026

# A public enquiry on night flights and its bizarre consequences

So what’s been happening? In July last year, LBA’s appeal against Leeds City Council’s rejection of the airport’s applications for Certificates of Lawful Existing Use or Development (CLEUDs) was heard at a public inquiry. LBA wanted to exempt its most commonly used planes from the

cap on night flights forever. [The planning inspector ruled against LBA's two most important CLEUDs.](#)

Although LBA's applications were rejected, the bizarre consequence of the public inquiry decision left LBA flying hundreds of aircraft at night that are not lawfully allowed to fly at night at all. However, precisely because they're not lawful, Leeds City Council hasn't counted them towards the limit on the number of flights allowed at night and, because LBA has appealed against the planning inspector's decision, the council hasn't taken any action to stop them.

Now LBA has come back with yet another CLEUD application that seeks to achieve the same result that it wanted previously – exemption from the night flight rules for its most frequently flown aircraft. Yes, it does sound odd, but LBA can keep on applying even though they lost last time.

What's even more frustrating is that a CLEUD is not decided by elected councillors on a planning committee but by an unelected council officer who can only consider the law and the figures. LBA say that if they can prove that the aircraft which are not allowed to fly at night at all have actually been flying at night for 10 continuous years, then those aircraft can fly as often as they want at night – forever – and no one can do anything about it.



## A simple way to restore the council's control

Obviously, in GALBA's view that just looks like rewarding bad behaviour. We've submitted our legal and factual arguments to Leeds City Council and will wait for the decision. Our guess is that if LBA loses (again), the airport's managers will appeal (again) and the whole merry-go-

round will continue. But ... there is something the council can do to restore control and stop LBA's rule breaking.

There are operating conditions in LBA's existing planning permission, which were set by, and can be used by, Leeds City Council. One of those conditions gives the council a power to approve (i.e. make lawful) nighttime flying by any aircraft that meet certain basic requirements. The aircraft that are the subject of LBA's CLEUD application meet those requirements, so it is within the council's power to approve them.

By doing that, the currently unlawful aircraft would become lawful and therefore have to be counted towards the cap on night flights. Moreover if – or more likely when – LBA next exceeds the night flight cap, Leeds City Council can take enforcement action to force the airport to stay within the limit on flight numbers set by the cap.

## Legal support for GALBA's position

Last year, GALBA asked the council to use such powers but we were told that it wasn't possible without an application from LBA. Of course, LBA won't do that because they want no restriction on their aircraft. To confirm whether waiting for an application from LBA was truly necessary, GALBA consulted a leading planning and environment barrister. This barrister, [Estelle Dehon KC](#), said no – the Council can just do it. You can read her legal opinion on [GALBA's website](#). So, we asked the Council again to use their power and now we've been told that the current CLEUD application means they can't. Strange, that's not what they said the first time.

We really need to get to the bottom of this, so we've asked to meet soon with the council's lead elected member for LBA, along with the lawyers advising both GALBA and the council. As the regulator for LBA, we want to work with Leeds City Council to resolve what is frankly an absurd situation.

Hopefully, a meeting of lawyers will lead to a meeting of minds and better protection for local people and the planet.



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Tags: [Bradford](#) [Environment](#) [Health](#) [Leeds](#)

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# Airport seeking night exemption for quieter planes



DANNY LAWSON/PA WIRE

Leeds Bradford Airport wants quieter aircraft to be exempt from a night time flying cap

## Spencer Stokes >

Yorkshire business correspondent

13 March 2026 · 52 Comments

**Leeds Bradford Airport has defended its decision to apply for immunity from prosecution when it flies certain types of aircraft overnight.**

The airport is currently limited to 2,920 aircraft movements between 23:00 and 07:00 BST annually.

But the Group for Action on Leeds Bradford Airport (GALBA) claimed the limit has been breached for four successive years between 2022 and 2025, with more than 500 additional flights each summer season.

GALBA's data is disputed by Leeds Bradford Airport, with chief executive Vincent Hodder suggesting that new aircraft that have a noise level of 87 dB or less shouldn't be included in the summertime night cap figures.

The airport's legal submission to Leeds City Council argued that aircraft below 87 dB operated continuously between 2010 and 2019 without enforcement and should, therefore, remain exempt now and in the future.

The airport is applying to the council for a certificate of lawful existing use or development (CLEUD) that would allow the quieter aircraft to remain outside the night quota.

Hodder said: "UK planning law lays out that if a breach of planning has existed continuously for a long period of time and that everybody has adjusted to the way restrictions on the airport apply, then those things become immune from enforcement.

"Our argument is for 10 years the airport continuously operated quieter aircraft during the night period that were in breach of the planning conditions in place at that time - we would argue that because that has happened it should be allowed to continue."



REUTERS

A growing number quieter aircraft like the Boeing 737 MAX have come into service in recent years

GALBA described the airport's application as "irresponsible and cowardly".

Ian Coatman, from the group, said: "LBA's argument is like a burglar being able to say, 'I've been stealing for 10 years and I haven't been caught, so now I can steal as often as I like forever and there's nothing anyone can do to stop me!'"

He added: "To be clear, no one is saying people should never take holidays abroad, but frequent night noise is harmful to the many thousands of people who live under the flight path."

Horsforth resident Susan Ditchfield lives close the runway and moved into her home before night flying had been permitted.

"It's relentless, one after another after another, just in a short space of time during the night, then there's a lull and then it starts again, it's just dreadful and such a nuisance," she said.



GALBA campaigners have protested against night flights at Leeds Bradford Airport

The airport said in the longer term it wanted to fly more than the summer night limit and hoped to change the regulations to a noise-based system, rather than one that counts individual aircraft movements.

Hodder added: "What we want to do is to change the rules around the way that the night flights are counted to provide a foundation for monitoring and controlling the level of noise which is produced by the airport and which causes discomfort for people who live around the airport."

Leeds City Council is asking for third parties to submit relevant factual evidence, such as flight data, flight times, flight frequency and size of aircraft – relating to the specific operations at Leeds Bradford so that they can be considered as part of the CLEUD application.

A council spokesperson said: "A call for evidence from third parties is currently ongoing in relation to the flying of certain types of aircraft during the nighttime period at Leeds Bradford Airport between 1 January 2010 to 31 December 2019.

"This began earlier this month and ends on 26 March, so it would be inappropriate to comment further until this process has been concluded and the evidence provided has been assessed."

## Get in touch

Your Voice

Contact form

*Listen to highlights from **West Yorkshire on BBC Sounds**, catch up with the latest **episode of Look North**.*

## Related topics

**Leeds**   **Air travel**   **Leeds Bradford International Airport**  
**Bradford**   **Horsforth**   **Leeds City Council**

## Related stories



**Airport to revisit plan for night flight changes**

28 October 2025



**Campaigners' night flights claim denied by airport**

20 November 2025

[View comments | 52](#)

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

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AJW30

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This is the exhibit marked "AJW30" in the witness statement of Alexander James Wright.

## **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.



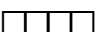
- 7. Give details of any fixed trial date or period
- 8. What level of Judge does your hearing need?
- 9. Who should be served with this application?
- 9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

30 June 2026 (second annual review hearing)

High Court Judge

Defendants (Persons Unknown)

The Claimants will arrange for service on the Defendants (Persons Unknown)



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.

We refer to the witness statement of Alexander James Wright dated 11 June 2026 (“**the 11 June 2026 Statement**”) which has previously been filed with the Court in these proceedings.

**1. Definition of the Defendants (Persons Unknown) in the Amended Claim Form and Amended Particulars of Claim**

The Claimants apply for permission to amend the Amended Claim Form and Amended Particulars of Claim in the form enclosed with this application so as to amend the definition of the Defendants (Persons Unknown) in the light of the evidence contained within the the 11 June 2026 Statement - which the Claimants respectfully submit should be reflected in the statements of case and the definition of the Defendants (Persons Unknown).

**2. Substitution of the Plans appended to the Amended Claim Form and the Amended Particulars of Claim**

For the below reasons, the Claimants apply for permission to amend:

- a) the Amended Claim Form by Substituting “Plan 2” with the annexed plan marked “Amended Plan 2”.
- b) the Amended Particulars of Claim by substituting “Plan 2”, “Plan 2A” and “Plan 2B” with the annexed plans marked “Amended Plan 2”, “Amended Plan 2A” and “Amended Plan 2B”.

As is more fully explained at paragraph 6 of the 11 June 2026 Statement, 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 – the extent of the differences between them is shown on the plan exhibited at Exhibit AJW10 of the 11 June 2026 Statement.

Adopting the same definitions used in the 11 June 2026 Statement, in respect of the LTN 2025 Areas:

- 1. the land making up the area shaded purple and marked ‘Area 1’ on the enclosed plan is land on which the majority of London Luton Airport’s landing lights, but not all, are located. For the reasons explained at paragraph 6.4.1.3 of the 11 June 2026 Statement, such land is not land in respect of which the Second Claimant proposes to seek an amendment to the current London Luton Airport injunction plan;
- 2. the land making up the area shaded purple and marked ‘Area 2’ on the enclosed plan is land which is erroneously included within the scope of the London Luton Airport Byelaws 2025. It is therefore not land in respect of which the Second Claimant proposes to seek an amendment to the current London Luton Airport injunction plan; and
- 3. the land making up the area shaded purple and marked ‘Area 3’ on the enclosed plan is land which is used by the airport’s car park operator (APCOA) to store cars. This is 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) this area of land can only be accessed by passing through the wider airport estate; and (b) such protection is considered appropriate and sufficient.

Adopting the same definitions used in the 11 June 2026 Statement, in respect of the LTN 2005 Area, the Second Claimant proposes an amendment to the current London Luton Airport injunction plan, so as to reflect the extent of the land over which the London Luton Airport Byelaws 2025 applies, with a further minor amendment proposed in respect of the area within the immediate vicinity of the roundabout at this location, which the Second Claimant proposes in the interests of better demarcating the geographical extent of the injunction boundary than would otherwise be the case if the London Luton Airport Byelaws 2025 was adopted without amendment. The area to the west of the roundabout at this location is a car park area.

The Claimants respectfully submit that the above should be reflected in the plans appended to the statements of case.

**3. The London Luton Airport Byelaws 2025**

The Claimants apply for permission to amend the Amended Particulars of Claim in the form enclosed with this application so as to refer to the provisions of the the London Luton Airport Byelaws 2025, which have replaced the the London Luton Airport Byelaws 2005 - which the Claimants respectfully submit should be reflected in the statements of case.

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.

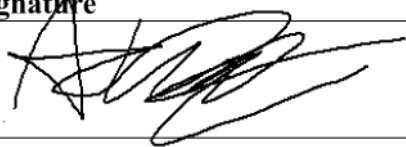
No

## 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

18

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

+44 750 057 8620

Fax phone number

DX number

Your Ref.

292659.000057/WRIGHTAX

Email

alexwright@eversheds-sutherland.com



Draft Re-Amended Claim Form

# Claim Form

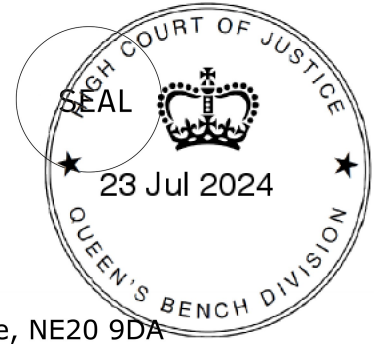
You may be able to issue your claim online which may save time and money. Go to [www.moneyclaim.gov.uk](http://www.moneyclaim.gov.uk) to find out more.

In the High Court of Justice Kings Bench Division	
Fee Account no.	PBA 0087211
Help with Fees - Ref no. (if applicable)	H W F - <input type="text"/> - <input type="text"/>

	For court use only
Claim no.	
Issue date	

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

- (1) **LEEDS BRADFORD AIRPORT LIMITED**  
of Leeds LS19 7TU
- (2) **LONDON LUTON AIRPORT OPERATIONS LIMITED**  
of Percival House, 134 Percival Way, London Luton Airport, Luton LU2 9NU
- (3) **NEWCASTLE INTERNATIONAL AIRPORT LIMITED**  
of Woosington, Newcastle Upon Tyne, NE13 8BZ
- (4) **NIAL SERVICES LIMITED**  
of Unit 1, Prestwick Industrial Est., Ponteland, Newcastle Upon Tyne, NE20 9DA



Defendant(s) name and Address(es) including postcode

Please refer to Schedule 1 attached to the Claim Form

KB-2024-002317  
DATE OF ISSUE  
16/07/24

Brief details of claim

The Claimants seek an injunction to restrain the Defendants from acts of trespass and/or private and/or public nuisance on the land edged red on Plans 1 - 3.

Value

This is a non monetary claim

Defendant's name and address for service including postcode

	£
Amount claimed	
Court fee	£626
Legal representative's costs	TBC
<b>Total amount</b>	

Claim no.

You must indicate your preferred County Court Hearing Centre for hearings here  
(see notes for guidance)

King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL

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

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

- No

Does, or will, your claim include any issues under the Human Rights Act 1998?

- Yes  
 No

Claim no.

Particulars of Claim

attached

to follow


## Statement of truth

**Note:** you are reminded that a copy of this claim form must be served on all other parties.

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

- I **believe** that the facts stated in this claim form and any attached sheets are true.
- The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

### Signature



- Claimant
- Litigation friend (where claimant is a child or protected party)
- Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day                      Month                      Year

16	07	2024
----	----	------

Full name

Alexander James Wright

Name of claimant's legal representative's firm

Eversheds Sutherland (International) LLP

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

Principal Associate

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Postcode

E | C | 2 | V | 7 | W | S

If applicable

Phone number

DX number

Your Ref.

362090.000001

Email

## SCHEDULE 1 TO THE CLAIM FORM

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

# London Luton Airport - Amended Plan 2



IN THE HIGH COURT OF JUSTICE  
KINGS BENCH DIVISION  
B E T W E E N

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

Claimants

-and-

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

**OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHERWISE)**

**Defendants**

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**[DRAFT] RE-AMENDED PARTICULARS OF CLAIM  
PURSUANT TO THE ORDER OF THE HONOURABLE MR JUSTICE RITCHIE  
DATED 23 JULY 2024**

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**Leeds Bradford Airport**

1. The First Claimant is the operator of Leeds Bradford Airport, located in Leeds, LS19 7TU, shown outlined in red on Plan 1 (“**LBA**”). LBA serves around 4 million travelling passengers each year with an annual revenue of approximately £43 million.
2. The First Claimant is the registered proprietor of the land on which LBA is situated as shown in red on Plan 1, through a mixture of freehold and leasehold interests as shown in the Title Schedule hereto — but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas and subject also to certain highways.
3. Subject to those interests, the First Claimant is entitled to an immediate right of possession occupation and control of LBA by virtue of its titles as shown in the Title Schedule.
4. Plan 1A identifies the areas within LBA over which the First Claimant lacks (or does not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests (“**the LBA Third Party Areas**”) or public rights of way (“**the LBA Highways**”). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First Claimant does not assert that it is the person with an immediate right of occupation or possession.
  - a. The LBA Third Party Areas are indicated by blue and green shading. The blue shading indicates areas within LBA which are the subject of leases or other occupational arrangements. The green shading indicates parts of LBA which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

- b. The LBA Highways are indicated by pink and purple shading. The pink highways are located at ground level and provide access to LBA to the First Claimant and its licensees (including members of the public). The purple highway runs beneath the runway at the airport.
5. As indicated on Plan 1A, there is one area shaded in blue which directly abuts the red line on the southern boundary of LBA. At that location, the boundary of LBA is not in the possession or control of the First Claimant. Apart from that exception: access to or from the LBA Third Party Areas by the public from outside the airport, involves the use of areas of LBA which remain unencumbered by any such arrangement and in relation to which, accordingly, the First Claimant remains entitled to possession occupation and control by virtue of their interests shown in the Title Schedule.
6. Plan 1B identifies the various interests held by the First Claimant in the land on which LBA is situated. At the south east, abutting the land shown hatched in pink registered under title WYK232726 at HM Land Registry, are landing lights ("**the LBA Landing Lights**"). Title to the land on which those lights are situate is registered in a third party's name. By an agreement dated 10 December 1982, a predecessor in title to the First Claimant was granted the right to erect and maintain landing lights in the relevant area of land. That agreement is unregistered.
7. By virtue of s63 of the Airports Act 1998, the First Claimant has power to make byelaws with respect to LBA. Pursuant to the Leeds Bradford Airport Byelaws 2022, byelaw 3.24, no person has a right to use any part of LBA as defined therein for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. The plan which defines LBA for the purposes of the byelaws does not extend in the south to the LBA Landing Lights. Apart from that, it includes all the land outlined in red on Plan 1A together with other land (shaded in yellow on Plan 1A). As at the date of commencement of this claim, the First Claimant seeks no relief in relation to the yellow land, notwithstanding that such land is within the byelaws, because the yellow land is not within the operational boundary of LBA. The First Claimant does not, however, repudiate the right to seek relief in relation to such areas, should events materialise which make that course appropriate.

## **London Luton Airport**

8. The Second Claimant is the operator of London Luton Airport, located in Luton, LU2 9LY, shown outlined in red on Plan 2 ("**Luton Airport**"). Luton Airport serves around 16.4 million travelling passengers each year with an annual revenue of approximately £296 million.
9. The Second Claimant is the proprietor of the land on which Luton Airport is situated as shown in red on Plan 2, through the interests shown in the Title Schedule hereto—  
— but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.
10. Subject to those interests of third parties, the Second Claimant is entitled to an immediate right of possession occupation and control of Luton Airport, by virtue of its titles as shown in the Title Schedule.
11. Plan 2A identifies the areas within Luton Airport over which the Second Claimant lacks (or does not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the Luton Third Party Areas**") or public rights of way ("**the Luton Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Second Claimant does not assert that it is the person with an immediate right of occupation or possession.
  - a. The Luton Third Party Areas are indicated in black, blue and green. The black land is a Direct Air-Rail Transit ("DART") and DART station. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.
  - b. The Luton Highways are indicated in pink. These provide access to Luton Airport to the Second Claimant and its licensees (including members of the public).
12. As indicated on Plan 2A, certain of the Luton Third Party Areas abut the red line on the western boundary of Plan 2A. At those locations, the boundary is not in the possession or control of the Second Claimant. Subject to that: access to or from the Luton Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Luton Airport which remain unencumbered

by any such arrangement and in relation to which, accordingly, the Second Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

13. Plan 2B identifies the various interests held by the Second Claimant in the land on which Luton Airport is situated. To the east of the land shown hatched green, are various landing lights some of which are situate on the land shown shaded in blue registered under title HD544934 at HM Land Registry (which the Second Claimant has a proprietary interest in). The remainder of the landing lights are shown in red but are not situate on the land shaded in blue ("**the Luton Landing Lights**"). Title to the land on which the Luton Landing Lights are situate is registered in a third party's name. The Second Claimant does not assert paper title to the land on which the Luton Landing Lights are situated. However, the Second Claimant has exclusive possession of the land in question by virtue of the installation of the lights, without consent from any person, and which have been in that location for around 20 years.
14. By virtue of s63 of the Airports Act 1998, the Second Claimant has power to make byelaws with respect to Luton Airport. Pursuant to the London Luton Airport Byelaws ~~2025~~ 2005, byelaw ~~8.8 2.16~~, no person, without permission, shall organise or take part in any public assembly, protest, demonstration or procession ~~no person has a right to use any part of Luton Airport for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport.~~ Save for the Luton Landing Lights, the plan which defines Luton Airport for the purposes of the byelaws includes all the land outlined in red on Plan 2A.

### **Newcastle Airport**

15. The Third Claimant is the operator of Newcastle International Airport, located in Woolsington, Newcastle upon Tyne, NE13 8BZ, shown outlined in red on Plan 3 ("**Newcastle Airport**"). Newcastle Airport serves around 5 million travelling passengers each year with an annual revenue of approximately £65 million.
16. The Third and Fourth Claimants are the proprietors of the land on which Newcastle Airport is situated as shown in red on Plan 3, through the interests shown in the Title Schedule hereto—but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.

17. Subject to the aforesaid interests of third parties, the Third and Fourth Claimants are entitled to an immediate right of possession occupation and control of Newcastle Airport, by virtue of its titles as shown in the Title Schedule and the agreements dated 21 January 2005; 4 May 2023; 20 October 1999; and 31 August 2020.
18. Plan 3A identifies the areas within Newcastle Airport over which the Third and Fourth Claimants lack (or do not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the Newcastle Third Party Areas**") or public rights of way ("**the Newcastle Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Third and Fourth Claimants do not assert that they are the person with an immediate right of occupation or possession.
  - a. The Newcastle Third Party Areas are indicated in black, blue and green. The black land is a railway station. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.
  - b. The Newcastle Highways are indicated in pink. These provide access to Newcastle Airport to the Third and Fourth Claimants and their licensees (including members of the public).
19. As indicated on Plan 3A, parts of the Newcastle Third Party Areas, being those areas shaded in blue which abut the red line at the north of Plan 3A and on the eastern and western boundary of Plan 3A. At those locations, the boundary is not in the possession or control of the Third and/or Fourth Claimants. Subject to that: access to or from the Newcastle Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Newcastle Airport which remain unencumbered by any such arrangement and in relation to which, accordingly, the Third and Fourth Claimant remain entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.
20. Plan 3B identifies the Third and Fourth Claimants' various registered interests in the land on which Newcastle Airport is situated. On the western and eastern boundaries of the land registered under title number TY433695 at HM Land Registry, are landing lights ("**the Newcastle Landing Lights**"). Title to the land on which those lights are situate is registered in a third party's name. By agreements dated 21 January

2005; 4 May 2023; 20 October 1999; and 31 August 2020, the Third Claimant was granted rights to erect and maintain landing lights in the relevant areas of land. Such rights or interests thereby granted are unregistered.

21. By virtue of s63 of the Airports Act 1986, the Third Claimant has power to make byelaws with respect to Newcastle Airport. Pursuant to the Newcastle Airport Byelaws 2021, byelaw 4.12 and 4.18, no person has a right to use any part of Newcastle Airport for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the Newcastle Landing Lights, the plan which defines Newcastle Airport for the purposes of the byelaws includes all the land outlined in red on Plan 3A.

### **The Claimants' claims**

22. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management/ airline facilities, and (save at LBA) a railway station.
23. In relation to each airport:
  - a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).
  - b. No wider consent subsists; and (subject to the highways described above) no public right of access, or way, subsists over the airports.
  - c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.

- d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.
24. In relation to the Third Party Areas at each airport:
- a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the Court to make an order which does not distinguish between the airports generally (as shown outlined in red on the various plans) and the Third Party Areas within them;
  - b. Further or alternatively, protest which occurs on the Third Party Areas interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.
25. In relation to the landing lights:
- a. For the LBA Landing Lights and/or the Newcastle Landing Lights, paragraph 23 above applies mutatis mutandis.
  - b. Alternatively and/or in respect of the LBA Landing Lights and/or the Luton Landing Lights and/or the Newcastle Landing Lights, paragraph 24a above applies mutatis mutandis and/or protest which occurs on the land on which the lights are situate interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the First and/or Second and/or Third Claimants' land, insofar as a need might arise to close off the runway for safety reasons in the event that the landing lights became compromised or threatened.
26. Further, in respect of the LBA Highways, the Luton Highways and the Newcastle Highways described above: protest which occurs on these highways interferes and/or threatens to interfere:
- a. Unreasonably and substantially, with the Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;

- b. Unreasonably and substantially, with (and/or to obstruct or hinder) the free passage along the highway, occasioning particular damage to the Claimants; and
- c. Further, in respect of the tunnelled highway in pink on Plan 1A, unreasonably and substantially, with the First Claimant's ordinary use and enjoyment of LBA, insofar as a need might arise to close off the runway for safety reasons; and
- d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the byelaws.

### **The threats**

27. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:
28. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations..."
29. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").
30. At this meeting, a co-founder of Just Stop Oil was reported to have advocated:
  - Cutting through fences and gluing themselves to runway tarmac;
  - Cycling in circles on runways;
  - Climbing on to planes to prevent them from taking off;
  - Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.

31. Since that meeting, Just Stop Oil has announced the following on its website:

**"SO WHAT'S THE PLAN?"**

*Our Government doesn't give a f\*\*\* about its responsibilities. The country is in ruins. You know it, I know, they know it. That means it's up to us to come together and be the change we need.*

*We need bold, un-ignorable action that confronts the fossil fuel elites. We refuse to comply with a system which is killing millions around the world, and that's why we have declared airports a site of nonviolent civil resistance."*

*We can't do this alone, we have a plan for this Summer, are you willing help make this happen?"*

32. It says, further:

**"This summer, Just Stop Oil will be taking action at airports.**

*As the grass becomes scorched, hosepipe bans kick in and the heat of the climate crisis enters peoples' minds, our resistance will put the spotlight on the heaviest users of fossil fuels and call everyone into action with us.*

*We'll work in teams of between 10-14 people willing to risk arrest from all over the UK. We need to be a minimum of 200 people to make this happen, but we'll be prepared to scale in size as our numbers increase. Exact dates and more details are coming.*

*Our plan can send shockwaves around the world and finish oil and gas. But we need each other to make it happen. Are you ready to join the team?"*

33. Just Stop Oil has also organised a fundraising page on the website <https://chuffed.org/project/just-stop-oil-resisting-against-new-oil-and-gas>, which says the following:<sup>1</sup>

**"Cat's out the bag. Just Stop Oil will take action at airports**

**The secret is out — and our new actions are going to be big.**

*We're going so big that we can't even tell you the full plan, but know this — Just Stop Oil will be taking our most radical action yet this summer. We'll be taking action at sites of key importance to the fossil fuel industry; **super-polluting airports.***

*..."*

34. On 6 June 2024, an email was sent from [info@juststopoil.org](mailto:info@juststopoil.org) to a subscriber list stating:

*"This is the most exciting email I've ever sent.*

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



- b. the two individuals (known as Jenifer Kowalski and Cole Macdonald) were arrested and charged with causing criminal damage, aggravated trespass and interference with the use or operation of national infrastructure.
38. Further, in respect of LBA and Luton Airport:
- a. in the period between 2019 and 2022, Extinction Rebellion repeatedly carried out protests about the planned expansion of LBA, including on highways and/or accessways to LBA. In September 2023, the First Claimant commenced construction works at LBA in order to expand the airport.
  - b. in the period between 2020 and 30 May 2024, various environmental protest groups carried out protests against the expansion of Luton Airport.
39. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for LBA, Luton Airport and/or Newcastle Airport
- a. trespass on the airports and/or
  - b. by protest conducted on or from the Third Party Areas and/or on or from the land on which the LBA Landing Lights, Luton Landing Lights and/or Newcastle Landing Lights are situate, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or
  - c. by protest conducted on or from the highways, obstruct those occasioning particular damage to the Claimants and/or interfere with the Claimants' right of access to the airports via those highways, so as to cause a nuisance actionable by the Claimants.
40. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.
41. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:
42. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively

modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.

43. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive — by which point harm may already have occurred.
44. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.
45. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.
46. The airports in the present case are all the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the Claimants are fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the Byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at Stansted Airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself

to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.

47. Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.
48. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

**AND THE FIRST CLAIMANT CLAIMS AGAINST THE FIRST DEFENDANT:**

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

**AND THE SECOND CLAIMANT CLAIMS AS AGAINST THE SECOND DEFENDANT:**

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

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

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

**STATEMENT OF TRUTH**

The Claimants believe that the facts stated in these ~~Re-Amended~~ particulars of claim are true. The Claimants understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by the Claimants to sign this statement.

---

Alexander James Wright

~~Principal Associate~~ Legal Director

**Eversheds Sutherland (International) LLP**

Claimants' solicitor

Dated: ~~16~~ 23 July 2024

**TITLE SCHEDULE TO THE PARTICULARS OF CLAIM**

1. **The First Claimant is the registered proprietor of the following titles:-**

<b>Title number</b>	<b>Freehold / Leasehold</b>
WYK232726	Freehold
WYK269721	Freehold
WYK275282	Freehold
WYK461796	Freehold
WYK500833	Freehold
WYK500834	Freehold
WYK512407	Freehold
WYK547070	Freehold
WYK547071	Freehold
WYK570873	Freehold
WYK574741	Freehold
WYK624715	Freehold
WYK657177	Freehold
WYK657180	Freehold
WYK698270	Freehold
WYK698436	Freehold
WYK706576	Freehold
WYK775942	Freehold
WYK723309	Freehold
WYK806314	Freehold
WYK831477	Freehold
WYK857105	Freehold
WYK857106	Freehold
WYK395678	Freehold
WYK657178	Leasehold
WYK501284	Leasehold

2. **The Second Claimant is the registered proprietor of the following titles:-**

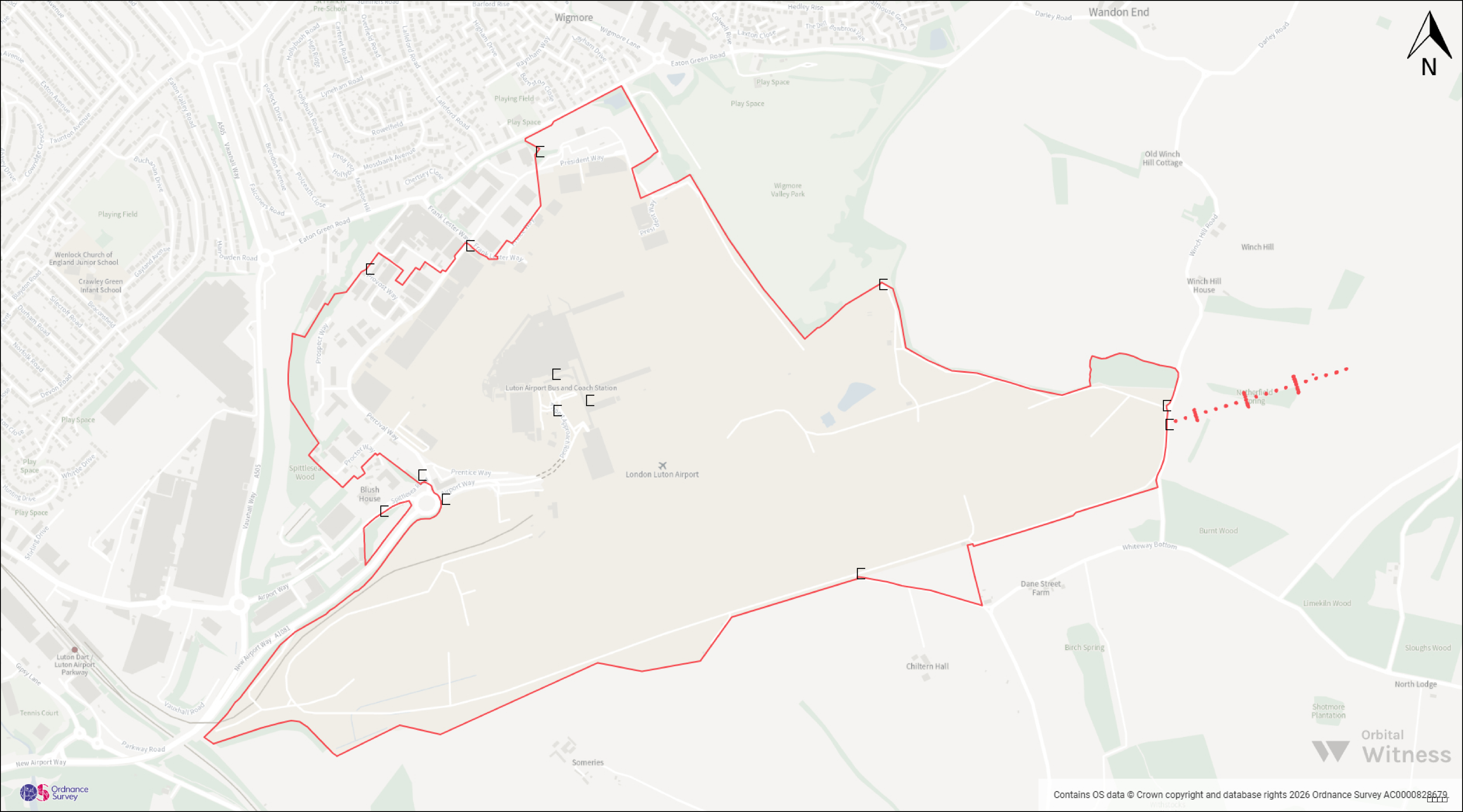
<b>Title number</b>	<b>Freehold / Leasehold</b>
BD235078	Leasehold
BD206048	Leasehold
BD339131	Leasehold
BD332840	Leasehold
BD216008	Leasehold
HD544934	Leasehold

3. **The Third Claimant is the registered proprietor of the following titles:-**

<b>Title number</b>	<b>Freehold / Leasehold</b>
TY349352	Freehold
TY476495	Freehold
TY433695	Freehold


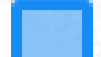

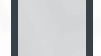

4. **The Fourth Claimant is the registered proprietor of the following titles:-**

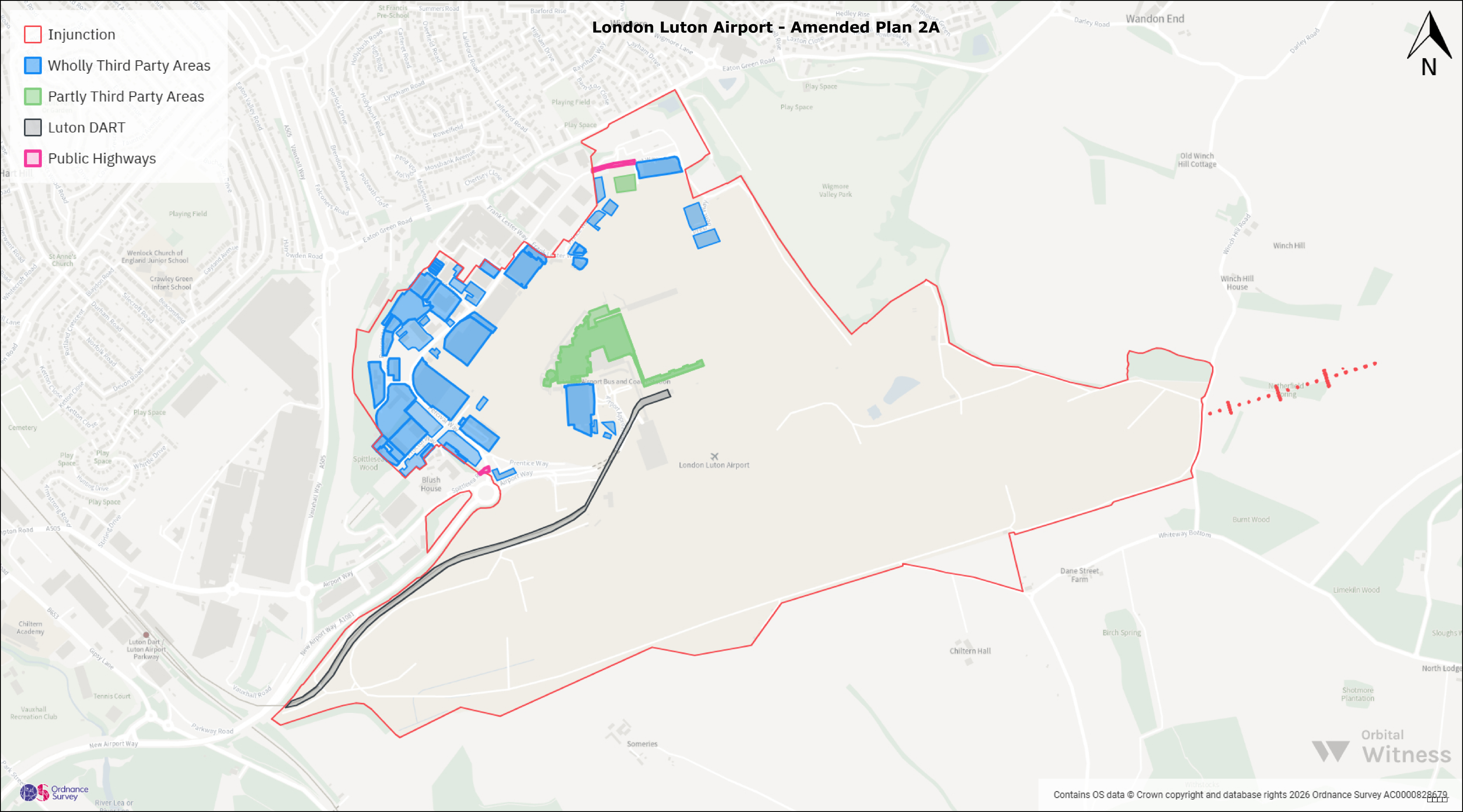
Title number	Freehold / Leasehold
ND75730	Freehold



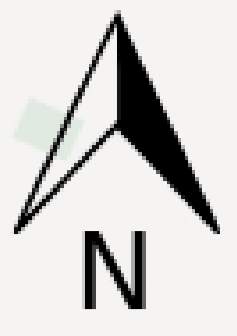
# London Luton Airport - Amended Plan 2A



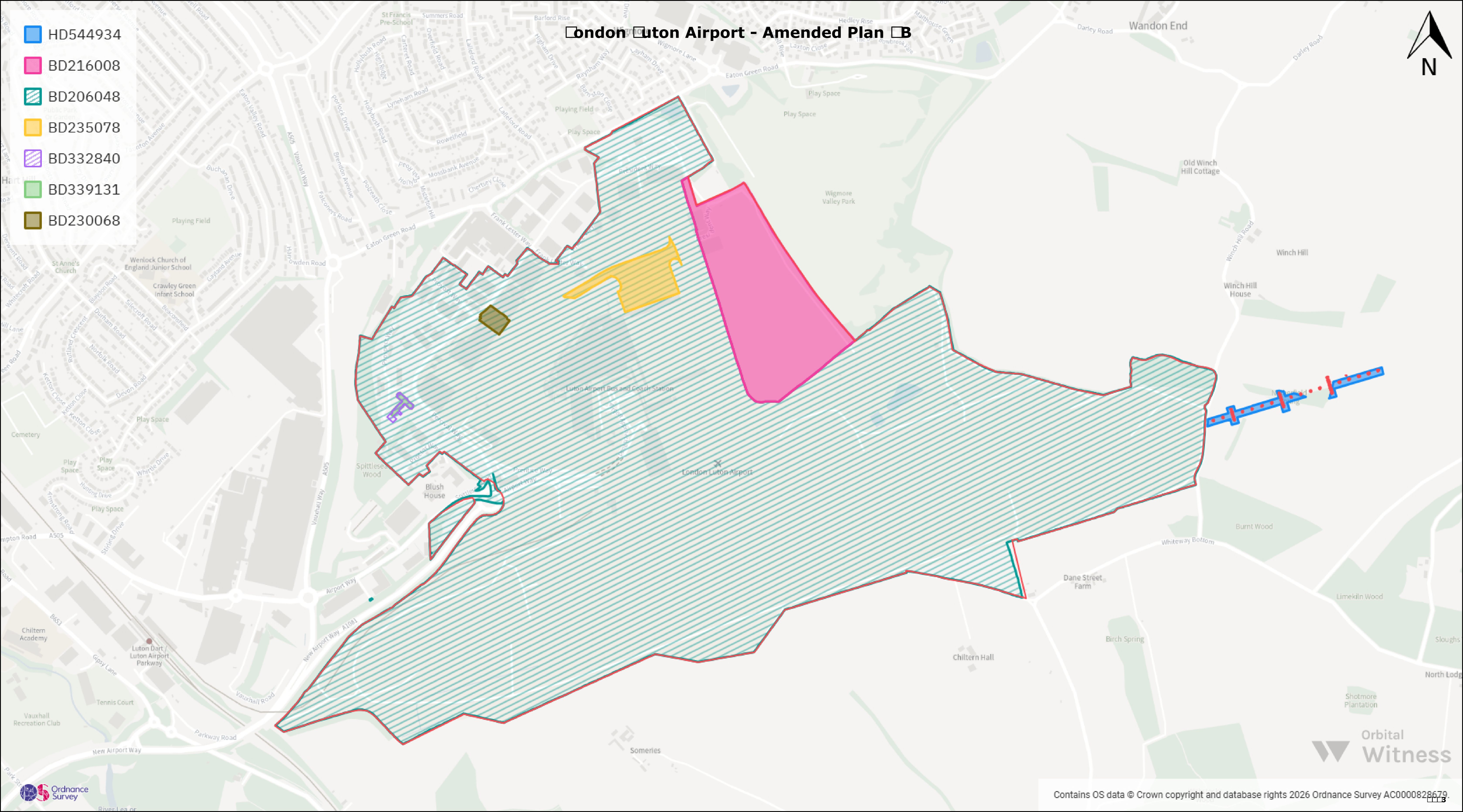
-  Injunction
-  Wholly Third Party Areas
-  Partly Third Party Areas
-  Luton DART
-  Public Highways



# London Luton Airport - Amended Plan



- HD544934
- BD216008
- BD206048
- BD235078
- BD332840
- BD339131
- BD230068



IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

- (1) BIRMINGHAM AIRPORT LIMITED
- (2) LIVERPOOL AIRPORT LIMITED
- (3) PEEL L&P INVESTMENTS (NORTH) LIMITED
- (4) BRISTOL AIRPORT LIMITED
- (5) SOUTH WEST AIRPORTS LIMITED
- (6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v -

PERSONS UNKNOWN  
AS MORE PARTICULARLY DESCRIBED  
IN THE AMENDED CLAIM FORM

Defendants

---

Draft Order

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This exhibit appears at pages 2064 to 2100.

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# Claim Form

**You may be able to issue your claim online which may save time and money. Go to [www.moneyclaim.gov.uk](http://www.moneyclaim.gov.uk) to find out more.**

<b>In the</b>	High Court of Justice King's Bench Division
<b>Fee Account no.</b>	PBA 0087211
<b>Help with Fees - Ref no.</b> (if applicable)	<b>H W F</b> - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/>

	For court use only
<b>Claim no.</b>	KB-2024-002473
<b>Issue date</b>	31 July 2024

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

**BIRMINGHAM AIRPORT LIMITED** of Diamond House, Birmingham Airport, Birmingham, West Midlands, B26 3QJ

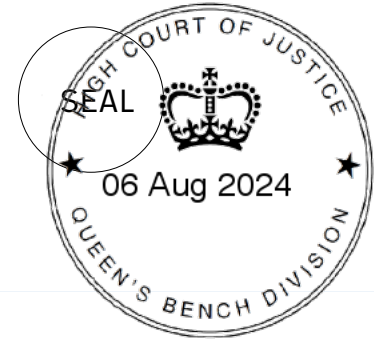
**IVERPOO AIRPORT LIMITED** of Venus Building 1 Old Park Lane, Traffordcity, Manchester M41 7HA

**PEEP INVESTMENTS NORTH LIMITED** of Venus Building 1 Old Park Lane, Traffordcity, Manchester M41 7HA

**BRISTO AIRPORT LIMITED** of Lulsgate House, Bristol Airport, Bristol BS48 3DW

**SOUTH EST AIRPORTS LIMITED** of Lulsgate House, Bristol Airport, Bristol BS48 3DW

**BRISTO AIRPORT DEVELOPMENTS LIMITED** of Lulsgate House, Bristol Airport, Bristol BS48 3DW



KB-2024-002473

Defendant(s) name and Address(es) including postcode

**Please refer to Schedule attached to the Claim Form**

Brief details of claim

The Claimants seek an injunction to restrain the Defendants from acts of trespass and/or private and/or public nuisance on the land edged red on Plan 1, Plan 2 and Plan 3.

Value

This is a non monetary claim

Defendant's name and address for service including postcode

	£
Amount claimed	
Court fee	£626
Legal representative's costs	TBC
<b>Total amount</b>	

For further details of the courts [www.gov.uk/find-court-tribunal](http://www.gov.uk/find-court-tribunal).

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.

You must indicate your preferred County Court Hearing Centre for hearings here  
(see notes for guidance)

King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL

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

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

- No

Does, or will, your claim include any issues under the Human Rights Act 1998?

- Yes  
 No

Claim no.

Particulars of Claim

attached

to follow

## Statement of truth

**Note:** you are reminded that a copy of this claim form must be served on all other parties.

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

- I **believe** that the facts stated in this claim form and any attached sheets are true.
- The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

### Signature



- Claimant
- Litigation friend (where claimant is a child or protected party)
- Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day                      Month                      Year

31                      0 7                      2 0 2 4

Full name

Stuart Sherbrooke Wortley

Name of claimant's legal representative's firm

Eversheds Sutherland (International) LLP

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

Partner

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Postcode

E | C | 2 | V | 7 | W | S

If applicable

Phone number

DX number

Your Ref.

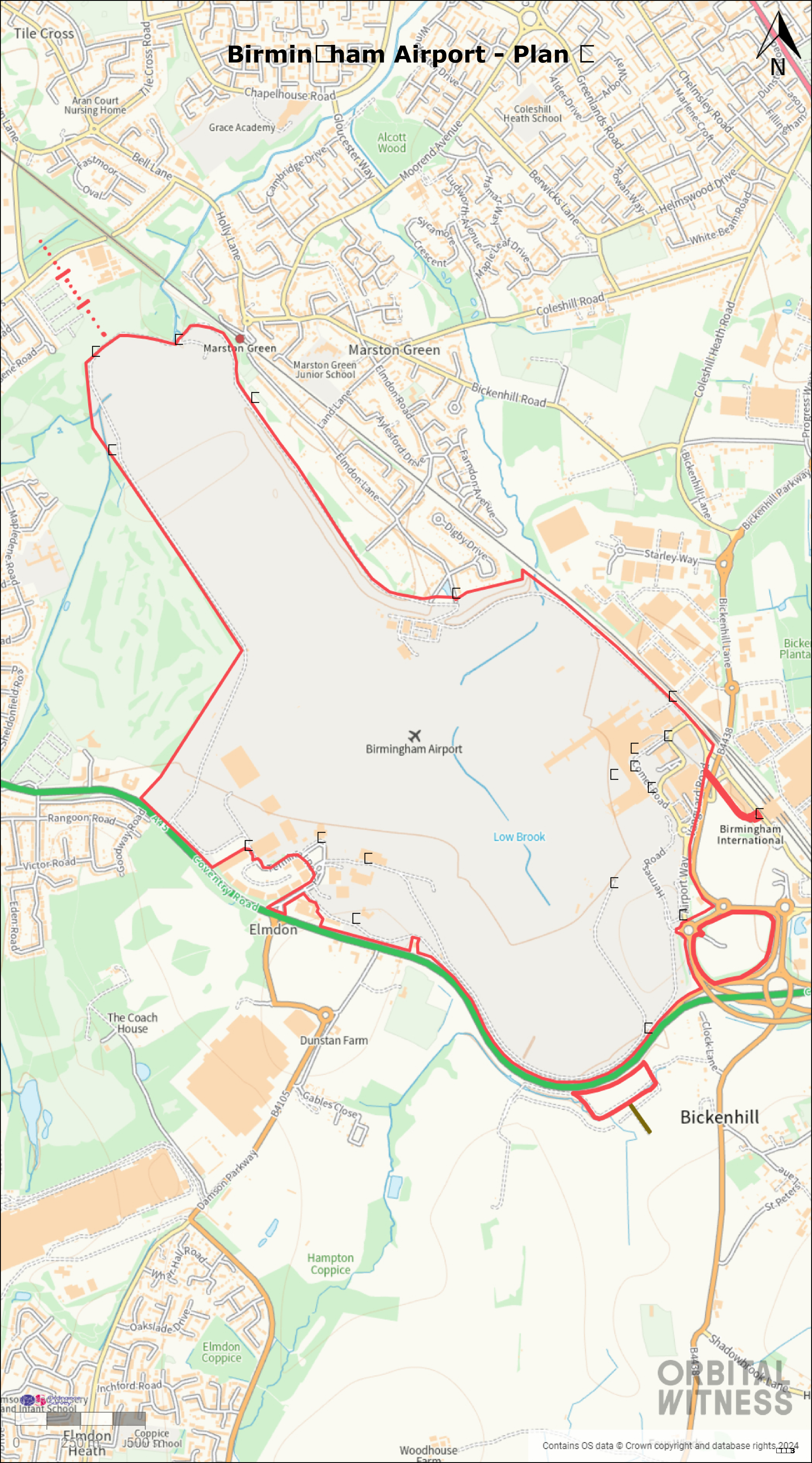
AllyboM/362291.1

Email

## Amended Schedule 1 to Claim Form

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

# Birmingham Airport - Plan

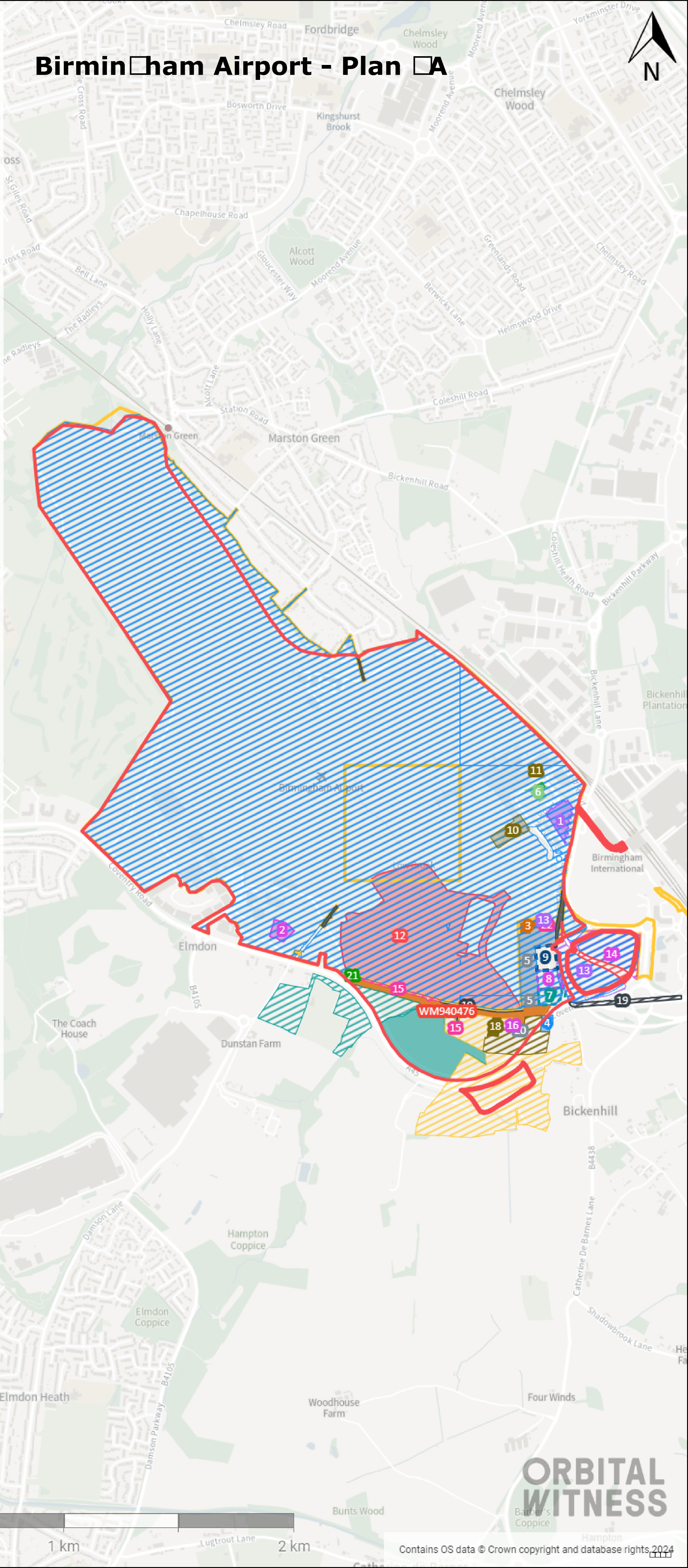


ORBITAL  
WITNESS

# Birmingham Airport - Plan A


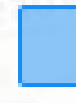






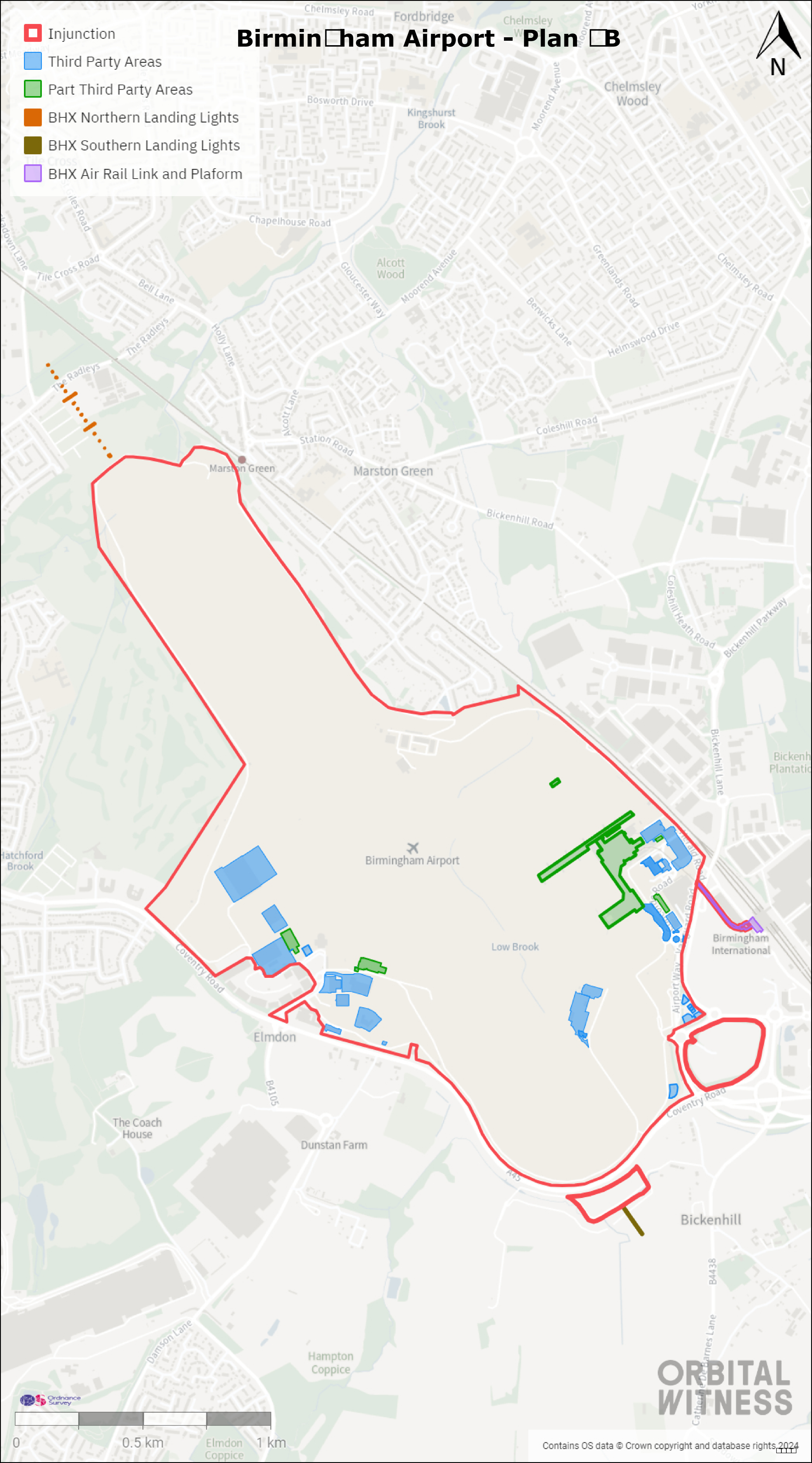
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- 2 (MM33687)
- 3 (WK106001)
- 4 (WM210117)
- 5 (WM533742)
- 6 (WM543119)
- 7 (WM580834)
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- 9 (WM613993)
- 10 (WM474034)
- 11 (WM836251)
- 12 (MM72387)
- 13 (WK2163)
- 14 (WM426768)
- 15 (WM503201)
- 16 (WM964966)
- 17 (WM933796)
- 18 (WM504259)
- 19 (WK8913)
- 20 (MM80239)
- 21 (MM14813)
- 22 (WK106592)
- WM836804
- MM14145
- MM20794
- WM941026
- WM940476
- WM141554
- WM203034
- WM225647
- WM442617
- WM484139
- WM642629
- WM772517
- WM765650
- Injunction



**ORBITAL  
WITNESS**

# Birmingham Airport - Plan B

-  Injunction
-  Third Party Areas
-  Part Third Party Areas
-  BHX Northern Landing Lights
-  BHX Southern Landing Lights
-  BHX Air Rail Link and Platform



**ORBITAL WITNESS**



- Injunction
- Third Party Areas
- Part Third Party Areas
- LJLA Western Landing Lights
- LJLA Eastern Landing Lights
- Public Highways

# Liverpool Airport - Plan B

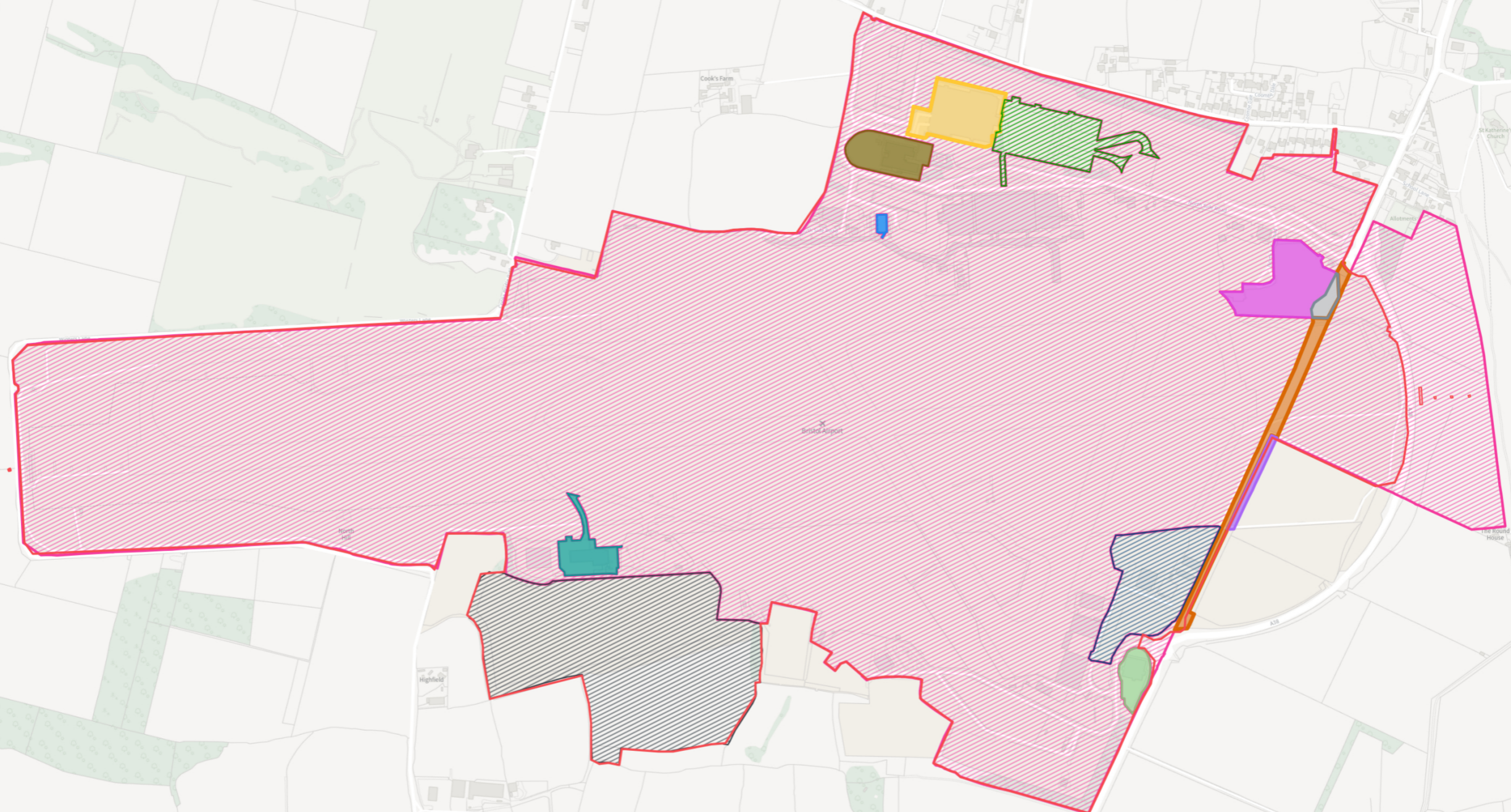


ORBITAL  
WITNESS

# Bristol Airport - Plan 3A








- ST371655
- ST180919
- ST351064
- ST337957
- ST355226
- ST355723
- ST358635
- ST358637
- ST359557
- ST370506
- ST370508
- ST283749
- ST331855



**ORBITAL  
WITNESS**



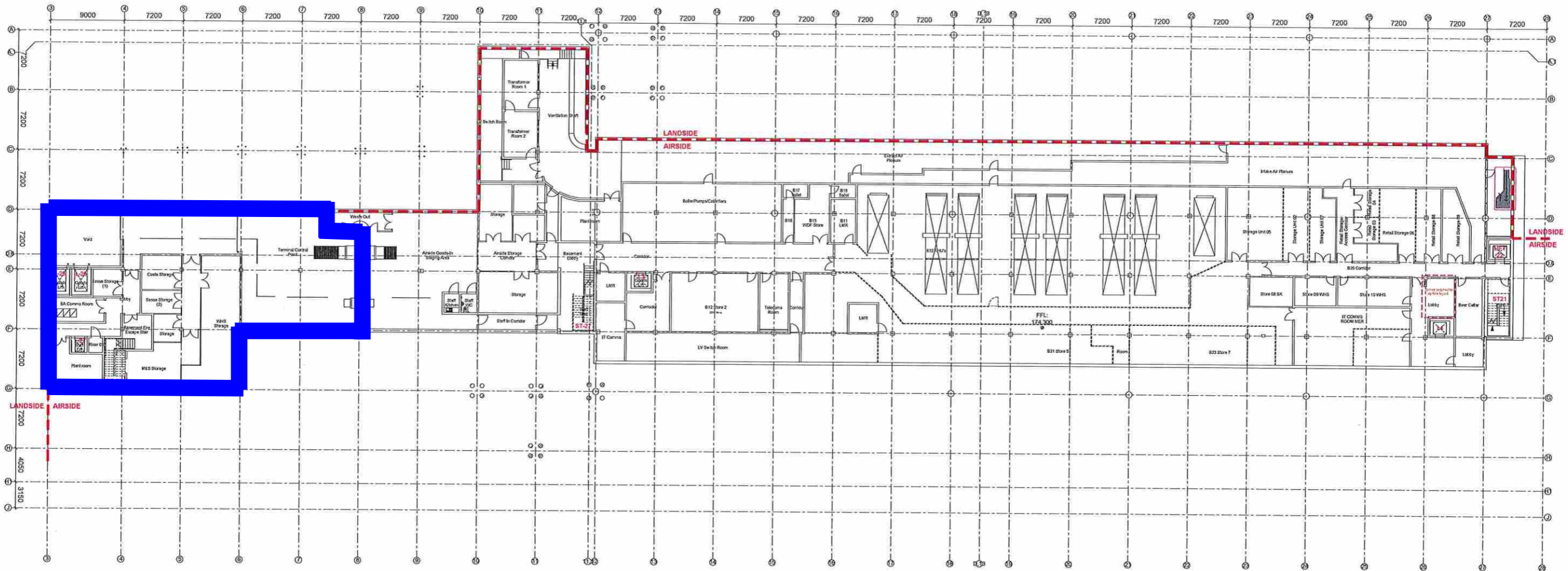
# Bristol Airport - Plan 3B


-  Injunction
-  Third Party Areas
-  Part Third Party Areas
-  BRS Western Landing Lights
-  BRS Eastern Landing Lights



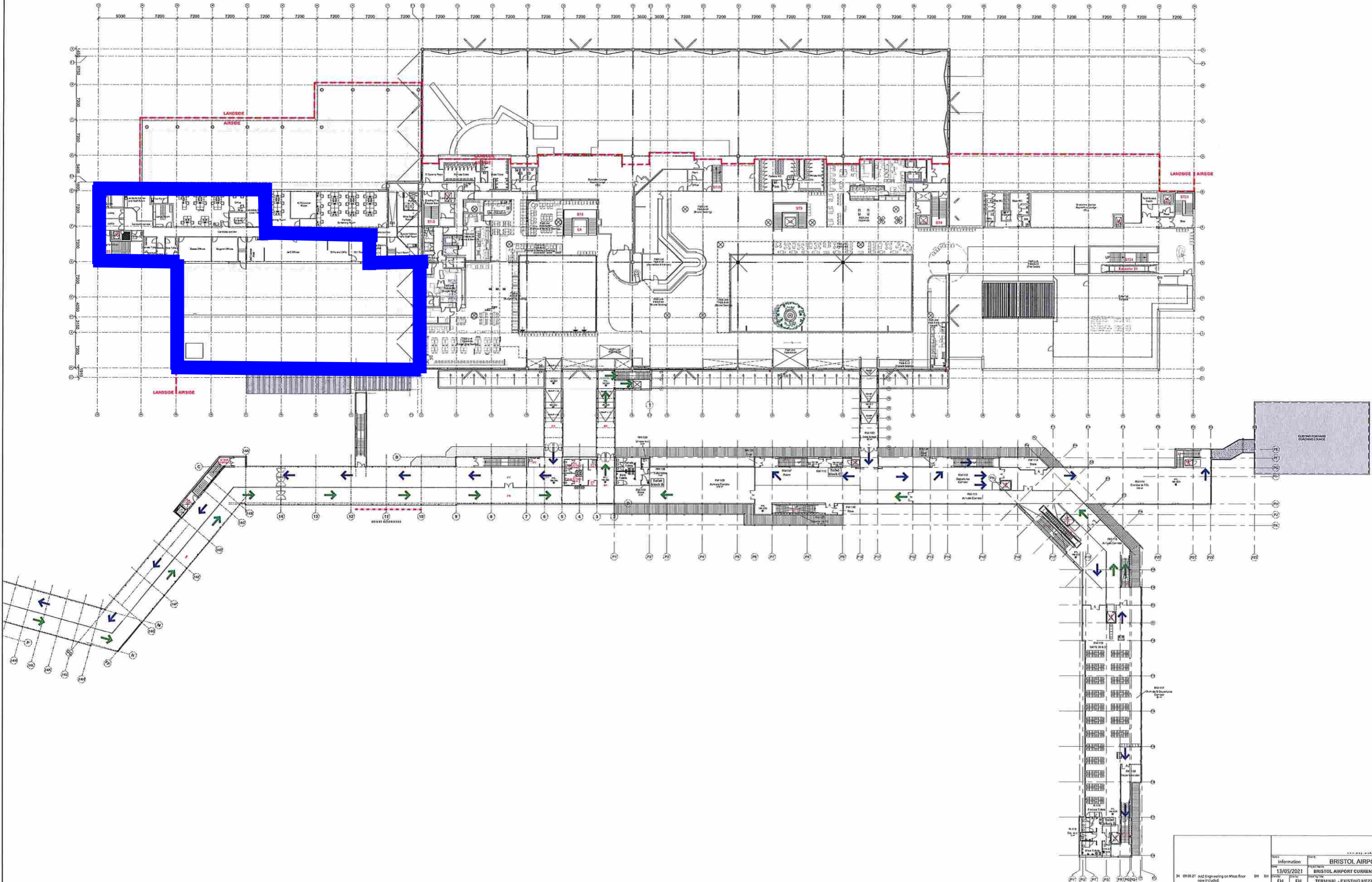
**ORBITAL  
WITNESS**

# Bristol Airport Terminal Basement - Plan 3C



19 13.05.21 Various updates		EH	EH	Scale	Page		
Date	Amendment	Drawn by	Check by	1:250	A0	Status: Information Client: BRISTOL AIRPORT Project Name: BRISTOL AIRPORT CURRENT DRAWINGS Drawing Title: TERMINAL - EXISTING BASEMENT FLOOR PLAN Drawing No: 11-600 - S2-202 Revision: 19	
© AMP Architecture Ltd. All rights reserved.							

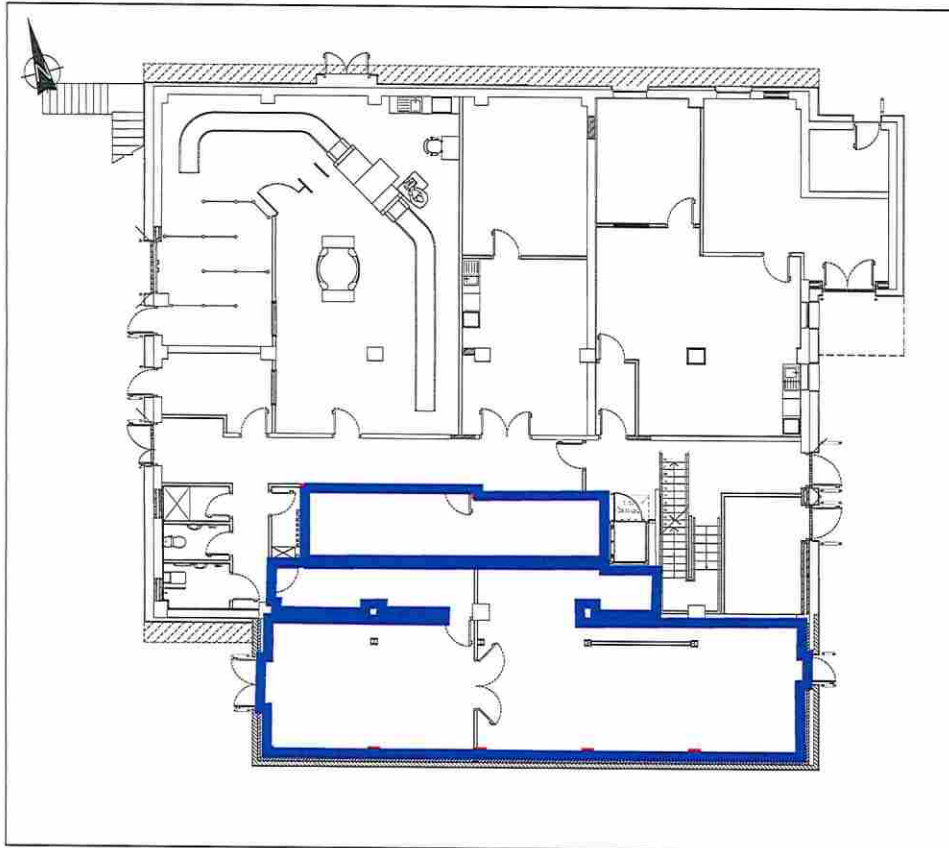
# Bristol Airport Terminal Mezzanine - Plan 3D



Information		BRISTOL AIRPORT	
34	09/07/21	13/05/2021	BRISTOL AIRPORT CURRENT DRAWINGS
33	13/05/21		TERMINAL - EXISTING MEZZ FLOOR PLAN
32			
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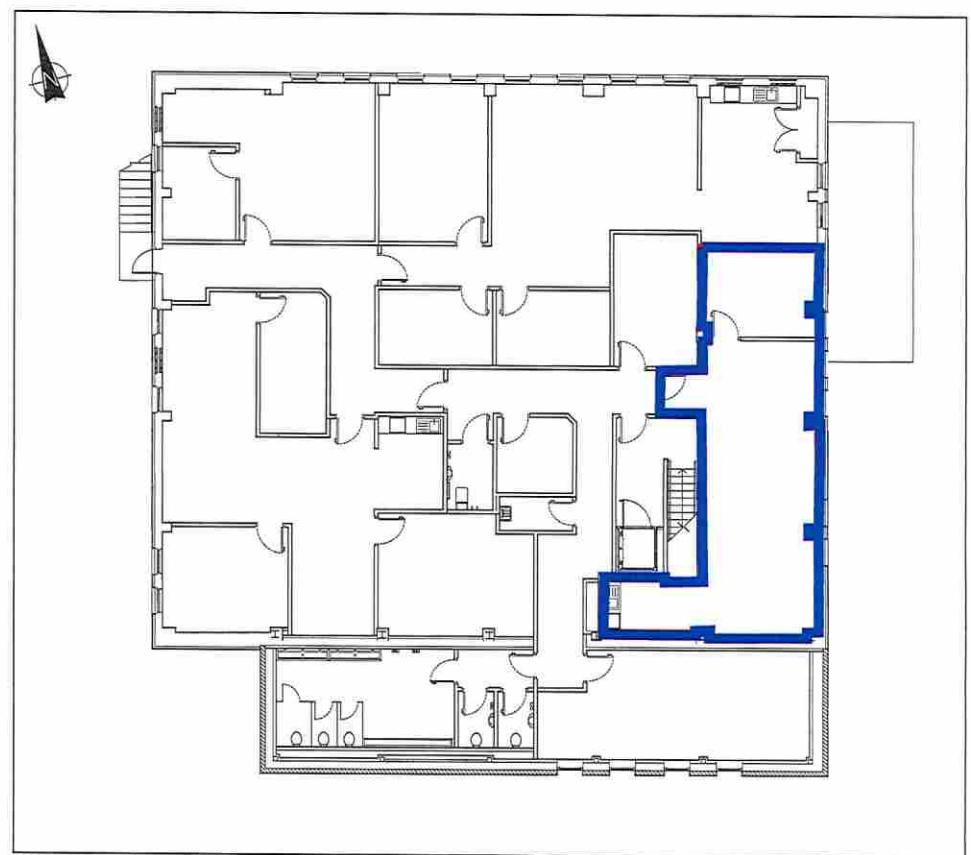


# Bristol Airport Northside House - Plan 3E



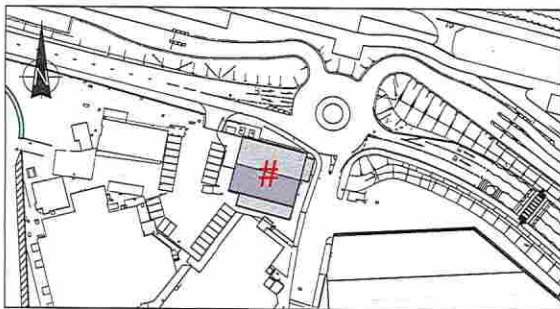
**LEASE PLAN - NSH GROUND FLOOR LEVEL**

Scale 1:250



**LEASE PLAN - NSH FIRST FLOOR LEVEL**

Scale 1:250



**SITE REFERENCE PLAN**

Scale 1:2500

**KEY**

**—** DENOTES LEASE DEMISE  
TOTAL DEMISE AREA: **195.5m<sup>2</sup>**

**#** DENOTES NORTHSIDE HOUSE (NSH) LOCATION

Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:	Scale:	Page:	Drawing No:	Revision:
					VARIES	A4	<b>18034 - LE2-01</b>	<b>0</b>

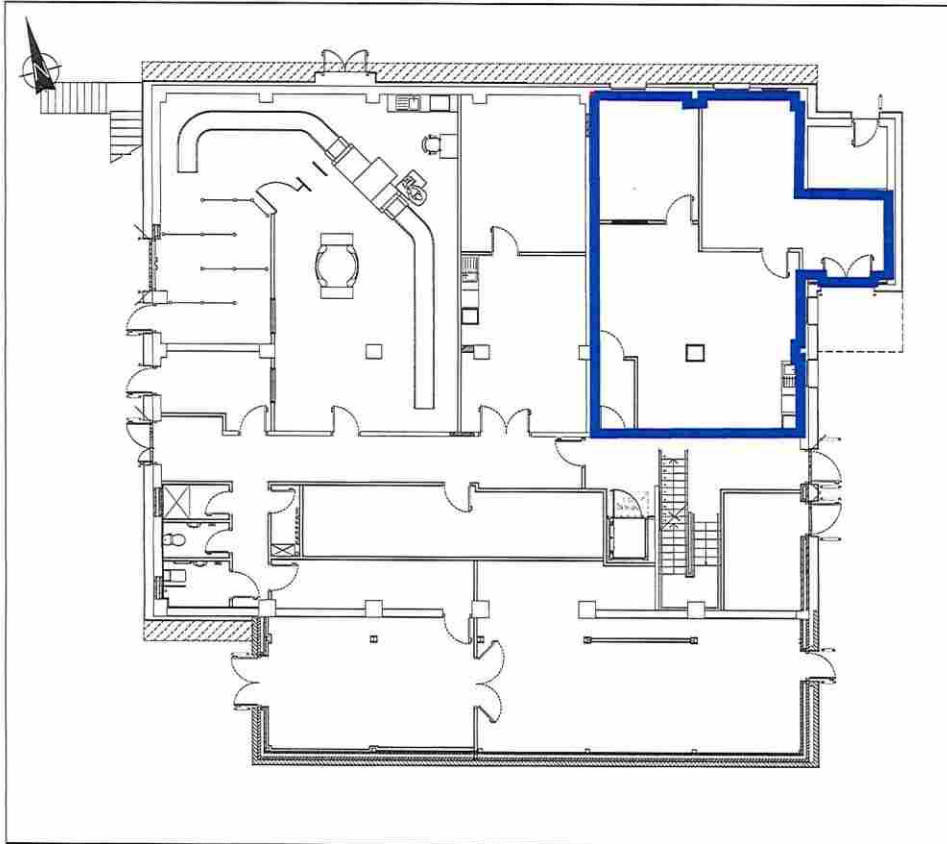
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2ND FLOOR TITANIC HOUSE,  
6 QUEENS ROAD, BELFAST  
BT3 9DT,  
T +44 (0) 28 9024 5587,  
E INFO@TODDARCH.CO.UK



Status:	Client:
<b>INFORMATION</b>	<b>BRISTOL AIRPORT</b>
Date:	Project Name:
<b>30/04/2019</b>	<b>NORTHSIDE HOUSE REFURB</b>
Dwn by:	Drawing Title:
<b>MM</b>	<b>SR TECHNICS</b>
Ckd by:	Drawing No:
<b>EH</b>	<b>18034 - LE2-01</b>
Scale:	Revision:
VARIES	<b>0</b>

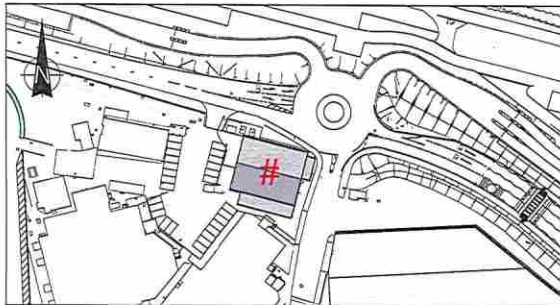


# Bristol Airport Northside House - Plan 3F






**LEASE PLAN - NSH GROUND FLOOR LEVEL**

Scale 1:250

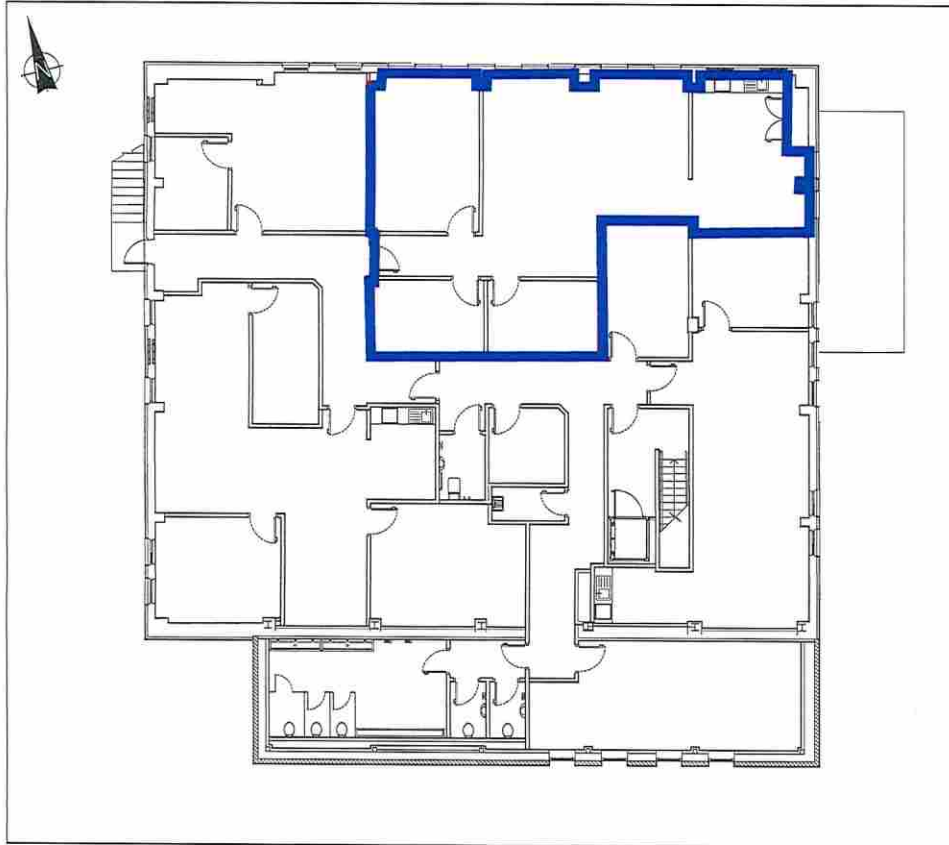


**SITE REFERENCE PLAN**

Scale 1:2500

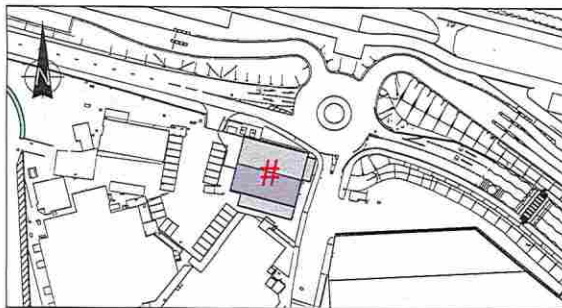
<p><b>KEY</b></p> <p> DENOTES LEASE DEMISE TOTAL DEMISE AREA: <b>91.7m<sup>2</sup></b></p> <p> DENOTES NORTHSIDE HOUSE (NSH) LOCATION</p>		<p>TODD ARCHITECTS 2ND FLOOR TITANIC HOUSE, 6 QUEENS ROAD, BELFAST BT3 9DT, T +44 (0) 28 9024 5587, E INFO@TODDARCH.CO.UK</p>			
		<p>Status: INFORMATION</p>			
		<p>Date: 30/04/2019</p>		<p>Project Name: NORTHSIDE HOUSE REFURB</p>	
		<p>Dwn by: MM Ckd by: EH</p>		<p>Drawing Title: TUI</p>	
		<p>Scale: VARIES Page: A4</p>		<p>Drawing No: 18034 - LE2-03</p>	
<p>Rev no:</p>	<p>Date:</p>	<p>Amendment:</p>	<p>Drwn by:</p>	<p>Chk'd by:</p>	<p>Revision: 0</p>

# Bristol Airport Northside House - Plan 3G



**LEASE PLAN - NSH FIRST FLOOR LEVEL**

Scale 1:250



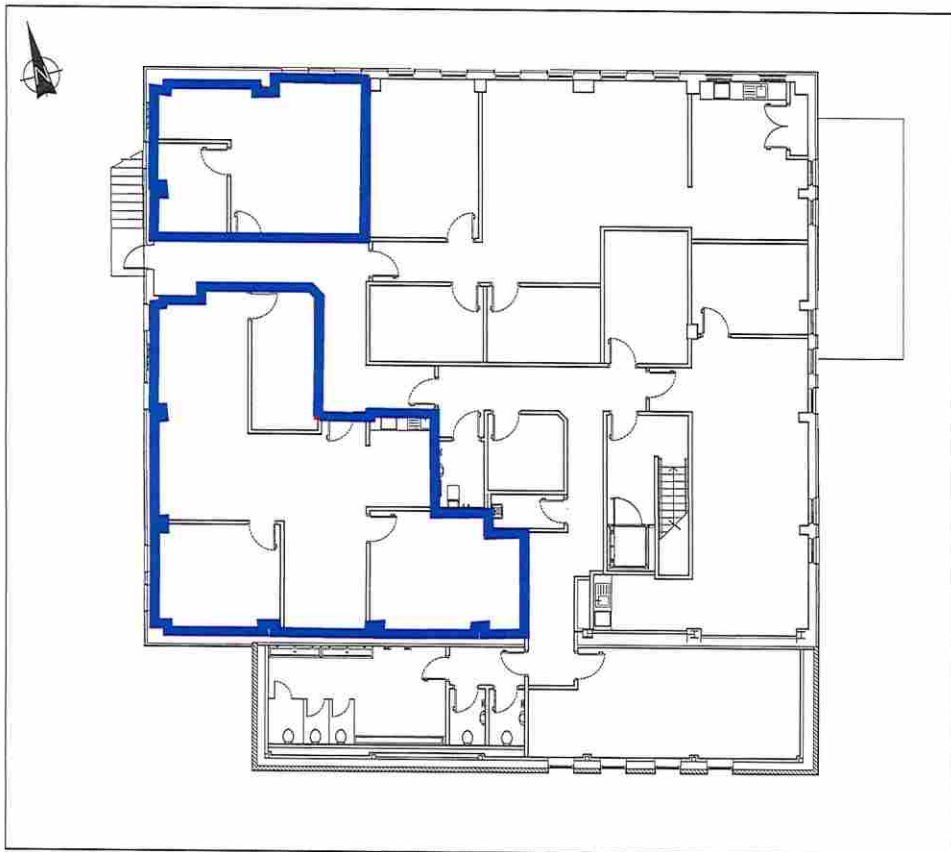
**SITE REFERENCE PLAN**

Scale 1:2500

<b>KEY</b>		TODD ARCHITECTS 2ND FLOOR TITANIC HOUSE, 6 QUEENS ROAD, BELFAST BT3 9DT, T +44 (0) 28 9024 5587, E INFO@TODDARCH.CO.UK		<b>TODD</b>		
<p>— DENOTES LEASE DEMISE TOTAL DEMISE AREA: <b>112.3m<sup>2</sup></b></p> <p># DENOTES NORTHSIDE HOUSE (NSH) LOCATION</p>		Status: INFORMATION Date: 30/04/2019 Dwn by: MM Ckd by: EH Scale: VARIES Page: A4			Client: BRISTOL AIRPORT Project Name: NORTHSIDE HOUSE REFURB Drawing Title: SWISSPORT	
Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:	Drawing No: <b>18034 - LE2-05</b>	Revision: <b>0</b>

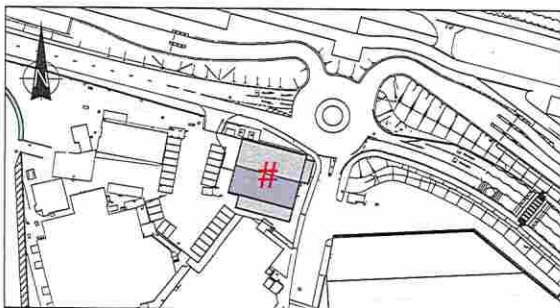


# Bristol Airport Northside House - Plan 3H



**LEASE PLAN - NSH FIRST FLOOR LEVEL**

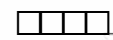
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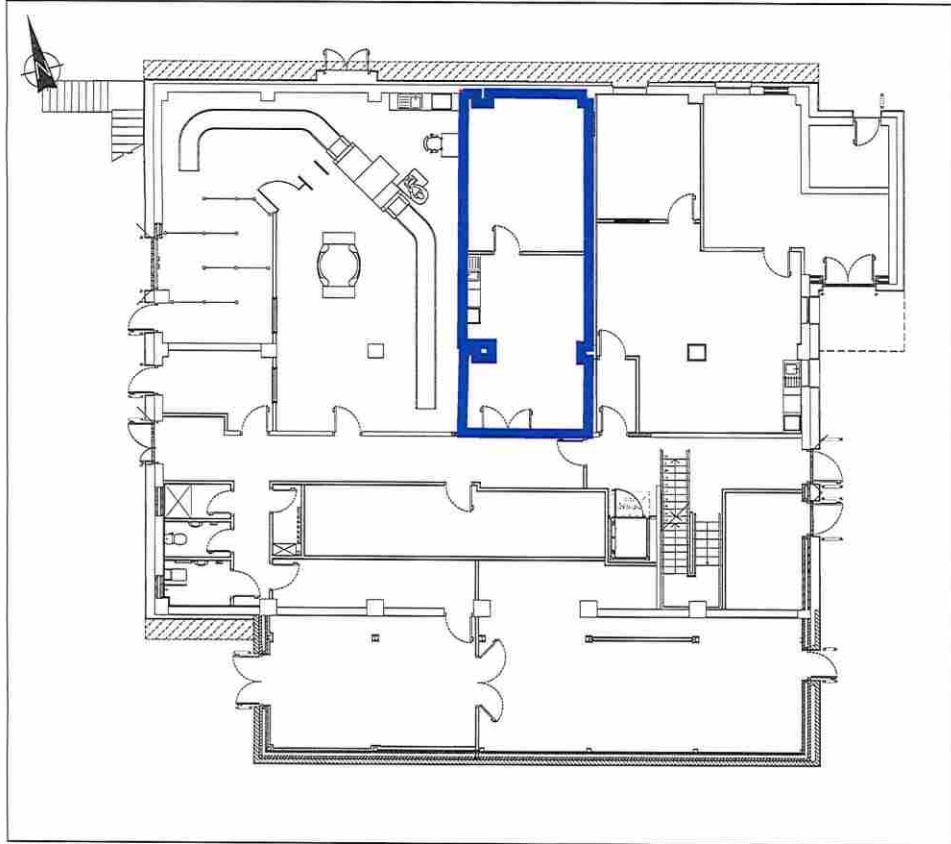
**SITE REFERENCE PLAN**

Scale 1:2500

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<p>— DENOTES LEASE DEMISE TOTAL DEMISE AREA: <b>147m<sup>2</sup></b></p> <p># DENOTES NORTHSIDE HOUSE (NSH) LOCATION</p>		Status: <b>INFORMATION</b> Date: <b>30/04/2019</b> Dwn by: <b>MM</b> Ckd by: <b>EH</b> Scale: <b>VARIES</b> Page: <b>A4</b>			Client: <b>BRISTOL AIRPORT</b> Project Name: <b>NORTHSIDE HOUSE REFURB</b> Drawing Title: <b>easyJet (DHL)</b>	
Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:	Drawing No: <b>18034 - LE2-04</b>	Revision: <b>0</b>

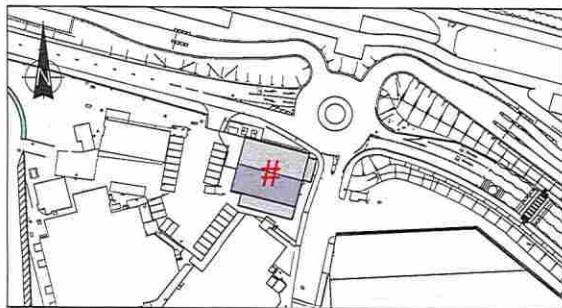


# Bristol Airport Northside House - Plan 3I



**LEASE PLAN - NSH GROUND FLOOR LEVEL**

Scale 1:250



**SITE REFERENCE PLAN**

Scale 1:2500

KEY		TODD ARCHITECTS 2ND FLOOR TITANIC HOUSE, 6 QUEENS ROAD, BELFAST BT3 9DT, T +44 (0) 28 9024 5587, E INFO@TODDARCH.CO.UK		<b>TODD</b>	
<p>— DENOTES LEASE DEMISE TOTAL DEMISE AREA: <b>49.7m<sup>2</sup></b></p> <p># DENOTES NORTHSIDE HOUSE (NSH) LOCATION</p>		<p>Status: INFORMATION</p> <p>Date: 30/04/2019</p> <p>Dwn by: MM Ckd by: EH</p> <p>Scale: VARIES Page: A4</p>		<p>Client: BRISTOL AIRPORT</p> <p>Project Name: <b>NORTHSIDE HOUSE REFURB</b></p> <p>Drawing Title: MORSON</p> <p>Drawing No: <b>18034 - LE2-02</b> Revision: <b>0</b></p>	
Rev no:	Date:	Amendment:	Drwn by:	Chk'd by:	



**CLAIM NO: KB – 2024 -002473**

**IN THE HIGH COURT OF JUSTICE**

**KING’S BENCH DIVISION**

**B E T W E E N**

- (1) BIRMINGHAM AIRPORT LIMITED
- (2) LIVERPOOL AIRPORT LIMITED
- (3) PEEL L&P INVESTMENTS (NORTH) LIMITED
- (4) BRISTOL AIRPORT LIMITED
- (5) SOUTH WEST AIRPORTS LIMITED
- (6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

**Claimants**

**- v -**

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT **WHO ENTER OR REMAIN** ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~
- (2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT **WHO ENTER OR REMAIN** ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~
- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT **WHO ENTER OR REMAIN** ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

**Defendants**

---

**AMENDED PARTICULARS OF CLAIM**

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## **Birmingham Airport**

1. The First Claimant is the operator of Birmingham Airport, located in Airport Way, Birmingham B26 3QJ, shown edged in red on Plan 1 ("**BHX**"). BHX serves around 11.8 million travelling passengers each year with an annual revenue of approximately £152 million.
2. With the exception of the parcels of land referred to in paragraph 9, the First Claimant is the registered proprietor of all of the land on which BHX is situated as shown in red on Plan 1, through the interests shown in the Title Schedule and on Plan 1A attached hereto - but subject to the interests referred to in paragraph 4.
3. Subject to the aforesaid interests, the First Claimant is entitled to an immediate right of possession occupation and control of BHX by virtue of its titles as shown in the Title Schedule and on Plan 1A.
4. Plan 1B identifies the areas within BHX over which the First Claimant lacks (or does not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests ("**the BHX Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First Claimant does not assert that it is the person with an immediate right of occupation or possession.
5. The BHX Third Party Areas are coloured blue and green on Plan 1B. The blue colouring indicates areas within BHX which are the subject of leases. The green colouring indicates parts of BHX which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.
6. There are five areas coloured blue on Plan 1B (numbered 1-5) each of which directly abuts the red line boundary of BHX. In each of those locations, the boundary of BHX is not in the possession or control of the First Claimant.
7. With those exceptions, access to or from the BHX Third Party Areas by the public from outside the airport, necessarily involves the use of areas of BHX which remain unencumbered by any such arrangement and in relation to which, accordingly, the First Claimant remains entitled to possession occupation and control by virtue of their interests shown in the Title Schedule and on Plan 1A.

8. Within the BHX red line boundary, there are 3 parcels in respect of which the First Claimant is not the registered proprietor:-
- a. although the land on which the northern landing lights (coloured orange on Plan 1B) are situated is registered in the name of a third party company, the First Claimant asserts that it is entitled to the immediate right of occupation or possession of those lights and the structure which supports them. Some of the lights and some parts of the structure have been in place since around 1967 and others since 2008. All of the lights and structures have been maintained by the First Claimant or its predecessors throughout that period;
  - b. on the south western boundary is an unregistered strip of land (coloured bright green on Plan 1A but omitted from the key on that plan) in respect of which the First Claimant asserts that it is entitled to the immediate right of occupation or possession; and
  - c. on the eastern boundary is an Air Rail Link and an associated platform and station. By an agreement for lease dated 1 April 2013, Network Rail Infrastructure Limited agreed to grant and the First Claimant (then known as Birmingham International Airport Limited) agreed to take a lease of the land coloured purple on Plan 1B for a term of 199 years. The lease has not been completed but the First Claimant asserts that it is entitled to the immediate right of occupation or possession of the land coloured purple.
9. By virtue of s 63 of the Airports Act 1996, the First Claimant has power to make byelaws with respect to BHX. Pursuant to the Birmingham Airport Limited Byelaws 2021, byelaw 3.32, no person has a right to use any part of BHX as defined therein for demonstrations or public assemble which is likely to obstruct or interfere with the proper use of the airport or the safety or security of passengers or persons using the airport. The plan which defines BHX for the purposes of the byelaws does not extend to the landing lights. Apart from that, it includes all the land edged in red on Plan 1.

### **Liverpool Airport**

10. The Second Claimant is the operator of Liverpool Airport, located in Speke Hall Avenue, Speke, Liverpool L24 1YD, shown edged in red on Plan 2 ("LJLA"). LJLA serves around 5 million travelling passengers each year with an annual revenue of approximately £35 million.

11. The Second Claimant is the proprietor of the land on which LJLA is situated as shown in red on Plan 2, through the interests shown in the Title Schedule and Plan 2A attached hereto - but subject to the interests referred to in paragraph 14.
12. The Third Claimant has been joined to the proceedings as it is the registered proprietor of the land on which the western landing lights (coloured brown on Plan 2B) are situated, which is registered under Title Number MS575438.
13. Subject to the aforesaid interests, the Second Claimant (and the Third Claimant in respect of the western landing lights) is entitled to an immediate right of possession occupation and control of LJLA, by virtue of its titles as shown in the Title Schedule and Plan 2A.
14. Plan 2B identifies the areas within LJLA over which the Second Claimant lacks (or does not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the LJLA Third Party Areas**") or public rights of way ("**the LJLA Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Second Claimant does not assert that it is the person with an immediate right of occupation or possession.
15. The LJLA Third Party Areas are coloured blue and green on Plan 2B. The blue colouring indicates areas within LJLA which are the subject of leases. The green colouring indicates parts of LJLA which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.
16. The LJLA Highways are indicated in pink on Plan 2B. These provide access to LJLA to the Second Claimant and its licensees (including members of the public).
17. Access to or from the LJLA Third Party Areas by the public from outside the airport, necessarily involves the use of areas of LJLA which remain unencumbered by any such arrangement and in relation to which, accordingly, the Second Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule and on Plan 2A.
18. All except 2 of the eastern landing lights (coloured orange on Plan 2B) are situated on title numbers CH596568 and CH384543 in respect of which the Second Claimant is the registered proprietor. The Second Claimant asserts that it is entitled to the

immediate right of occupation or possession of the other 2 landing lights and the structure which supports them which are situated on unregistered land. The lights and the structure which supports them have been in this location since around 1960 and they have been maintained by the Second Claimant or its predecessors throughout that period.

19. By virtue of s 63 of the Airports Act 1996, the Second Claimant has power to make byelaws with respect to LJLA. Pursuant to the Liverpool John Lennon Airport Byelaws 2022, byelaw 2.18, no person has a right to use any part of LJLA for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the landing lights, the plan which defines LJLA for the purposes of the byelaws includes all of the land edged in red on Plan 2.

### **Bristol Airport**

20. The Fourth Claimant is the operator of Bristol Airport, located in Bristol BS48 3DY, shown edged in red on Plan 3 ("**BRS**"). BRS serves around 10 million travelling passengers each year with an annual revenue of approximately £179 million.
21. The Fourth, Fifth and Sixth Claimants are the proprietors of the land on which BRS is situated as shown in red on Plan 3, through the interests shown in the Title Schedule and Plan 3A hereto - but subject to the interests referred to in paragraph 23.
22. Subject to the aforesaid interests, the Fourth, Fifth and Sixth Claimants are entitled to an immediate right of possession occupation and control of BRS, by virtue of its titles as shown in the Title Schedule and Plan 3A.
23. Plan 3B identifies the areas within BRS over which the Fourth, Fifth and Sixth Claimants lack (or do not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests ("**the BRS Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fourth, Fifth and Sixth Claimants do not assert that they are the person with an immediate right of occupation or possession.
24. The BRS Third Party Areas are coloured blue and green on Plan 3B. The blue colouring indicates areas within BRS which are the subject of leases. The green colouring indicates parts of BRS which include such areas. By way of example, the

blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

25. Access to or from the BRS Third Party Areas by the public from outside the airport, necessarily involves the use of areas of BRS which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fourth, Fifth and Sixth Claimants remain entitled to possession occupation and control by virtue of its interests shown in the Title Schedule and on Plan 3A.
26. Although the land on which the western landing lights (coloured brown on Plan 3B) are situated is registered in the name of a third party individual, the Fourth Claimant asserts that it is entitled to the immediate right of occupation or possession of those lights and the structure which supports them. The lights and structure have been in place since around 2004 and have been maintained by the Fourth Claimant or its predecessors throughout that period.
27. By virtue of s63 of the Airports Act 1996, the Fourth Claimant has power to make byelaws with respect to BRS. Pursuant to the Bristol Airport Byelaws 2012, byelaw 4.17, no person has a right to organise or take part in any protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the landing lights, the plan which defines BRS for the purposes of the byelaws includes all the land outlined in red on Plan 3.

### **The Claimants' claims**

28. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management / airline facilities and (in the case of BHX) the Air Rail Link railway.
29. In relation to each airport:
  - a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at

the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).

- b. No wider consent subsists; and (subject to the highways described above) no public right of access, or way, subsists over the airports.
- c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.
- d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

30. In relation to the Third Party Areas at each airport:

- a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the Court to make an order which does not distinguish between the airports generally (as shown outlined in red on the various plans) and the Third Party Areas within them; and
- b. Further or alternatively, protest which occurs on the Third Party Areas interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.
- a. The like considerations apply in relation to those of the landing lights not in the outright possession of the Claimants.

31. Further, in respect of the LJLA Highways described above: protest which occurs on these highways interferes and/or threatens to interfere:

- b. Unreasonably and substantially, with the Second and Third Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;
- c. Unreasonably and substantially, with (and/or to obstruct or hinder) the free passage along the highway, occasioning particular damage to the Second and Third Claimants; and
- d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the byelaws.

### **The threats**

32. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:
33. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations..."
34. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").
35. At this meeting, a co-founder of Just Stop Oil was reported to have advocated:
  - Cutting through fences and gluing themselves to runway tarmac;
  - Cycling in circles on runways;
  - Climbing on to planes to prevent them from taking off;
  - Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.
36. Since that meeting, Just Stop Oil has announced the following on its website:

**"SO WHAT'S THE PLAN?"**

*Our Government doesn't give a f\*\*\* about its responsibilities. The country is in ruins. You know it, I know, they know it. That means it's up to us to come together and be the change we need.*

*We need bold, un-ignorable action that confronts the fossil fuel elites. We refuse to comply with a system which is killing millions around the world, and that's why we have declared airports a site of nonviolent civil resistance."*

*We can't do this alone, we have a plan for this Summer, are you willing help make this happen?"*

37. It says, further:

***"This summer, Just Stop Oil will be taking action at airports.***

*As the grass becomes scorched, hosepipe bans kick in and the heat of the climate crisis enters peoples' minds, our resistance will put the spotlight on the heaviest users of fossil fuels and call everyone into action with us.*

*We'll work in teams of between 10-14 people willing to risk arrest from all over the UK. We need to be a minimum of 200 people to make this happen, but we'll be prepared to scale in size as our numbers increase. Exact dates and more details are coming.*

*Our plan can send shockwaves around the world and finish oil and gas. But we need each other to make it happen. Are you ready to join the team?"*

38. Just Stop Oil has also organised a fundraising page on the website <https://chuffed.org/project/just-stop-oil-resisting-against-new-oil-and-gas>, which says the following:<sup>1</sup>

***"Cat's out the bag. Just Stop Oil will take action at airports***

***The secret is out — and our new actions are going to be big.***

*We're going so big that we can't even tell you the full plan, but know this — Just Stop Oil will be taking our most radical action yet this summer. We'll be taking action at sites of key importance to the fossil fuel industry; **super-polluting airports.***

*..."*

39. On 6 June 2024, an email was sent from [info@juststopoil.org](mailto:info@juststopoil.org) to a subscriber list stating:

*"This is the most exciting email I've ever sent.*

*As many of you already know, this summer Just Stop Oil is taking action at airports.*

*That's exciting right? Well, there's more.*

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<sup>1</sup> As of 29 July 2024, £24,519 had been raised on this website.



43. On 25 June 2024, six JSO activists were arrested at Gatwick Airport and were found to be carrying luggage containing a large number of bandages thought to have been intended to interfere with jet engines or to block lavatories.
44. On 27 June 2024, six JSO activists were arrested by the Metropolitan Police whilst attending an event organised by JSO.
45. On 29 June 2024, JSO sent an email to subscribers in the following terms:-

***"Since Tuesday, 31 supporters of Just Stop Oil have now been arrested for possessing the strong convictions that governments and corporations do not have the right to prioritise oil profits over the safety and wellbeing of our loved-ones, communities and the many millions already suffering the effects of runaway climate breakdown.***

*In a sane society, it would be those who are setting the stage for an end to ordered society that would be having their doors barged down and dragged into the back of a police van to be interrogated about the catastrophic criminal damages they are imposing on every living thing and on every future generation. Instead, it is ordinary people- mothers, grandparents and young people who are having their futures stolen from them, that the police come for.*

***The incoherent pattern of arrests we have seen over the last 24 hours suggests a rattled system. They know that as climate breakdown intensifies, civil unrest will increase and one day there will not be enough police to cope with the millions stepping into action, as the full betrayal of the political establishment becomes clearer.***

***We will not be intimidated by the death throes of a broken system. Nothing the state can throw at us is worse than the realities that will be imposed on all of us if the breakdown of our climate carries on unabated. We WILL be stepping into action in the summer because when the lives of your family are at risk, there is no other choice than to protect them..."***

46. On 24 July 2024, a further ten JSO activists were arrested at Heathrow Airport following an intelligence led operation. According to media reports, some of those arrested were found to be carrying cutting gear and glue.
47. On 28 July 2024, a further eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with national infrastructure.
48. On 29 July 2024, a further two JSO activists were arrested at Heathrow Airport after spraying orange paint around the entrance hall to Terminal 5.

49. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for BHX, LJLA and/or BRS:
- c. trespass on the airports and/or
  - d. by protest conducted on or from the Third Party Areas and/or on or from the land on which the landing lights (which are not within the Byelaw plans) are situate, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or
  - e. by protest conducted on or from the highways, obstruct those occasioning particular damage to the Claimants and/or interfere with the Claimants' right of access to the airports via those highways, so as to cause a nuisance actionable by the Claimants.
50. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.
51. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:
52. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.
53. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive — by which point harm may already have occurred.
54. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.

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

**AND THE FIRST CLAIMANT CLAIMS AGAINST THE FIRST DEFENDANT:**

- (1) Subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months or such other period as the Court may determine,

an order that the First Defendants must not, without the consent of the First Claimant enter, occupy or remain upon the land outlined in red on Plan 1.

**AND THE SECOND AND THIRD CLAIMANTS CLAIM AS AGAINST THE SECOND DEFENDANT:**

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

**AND THE FOURTH, FIFTH AND SIXTH CLAIMANTS CLAIM AGAINST THE THIRD DEFENDANT:**

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

**STATEMENT OF TRUTH**

The Claimants believe that the facts stated in these particulars of claim are true. The Claimants understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by the Claimants to sign this statement.



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Stuart Sherbrooke Wortley

Partner

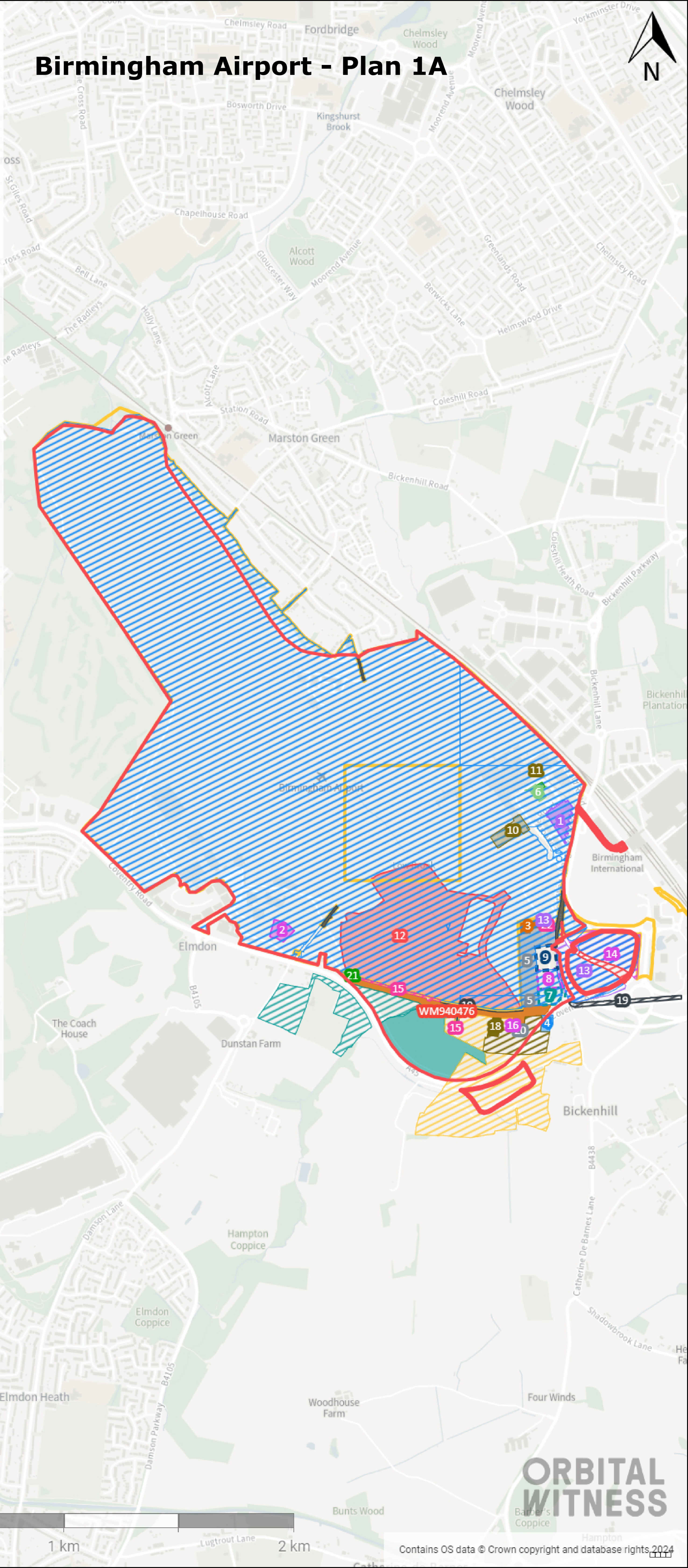
**Eversheds Sutherland (International) LLP**

Dated: 31 July 2024

# Birmingham Airport - Plan 1A




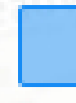




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- 3 (WK106001)
- 4 (WM210117)
- 5 (WM533742)
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- 11 (WM836251)
- 12 (MM72387)
- 13 (WK2163)
- 14 (WM426768)
- 15 (WM503201)
- 16 (WM964966)
- 17 (WM933796)
- 18 (WM504259)
- 19 (WK8913)
- 20 (MM80239)
- 21 (MM14813)
- 22 (WK106592)
- WM836804
- MM14145
- MM20794
- WM941026
- WM940476
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- WM484139
- WM642629
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- WM765650
- Injunction

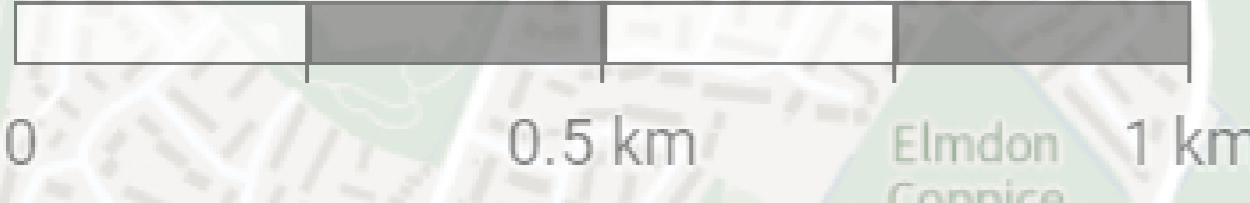
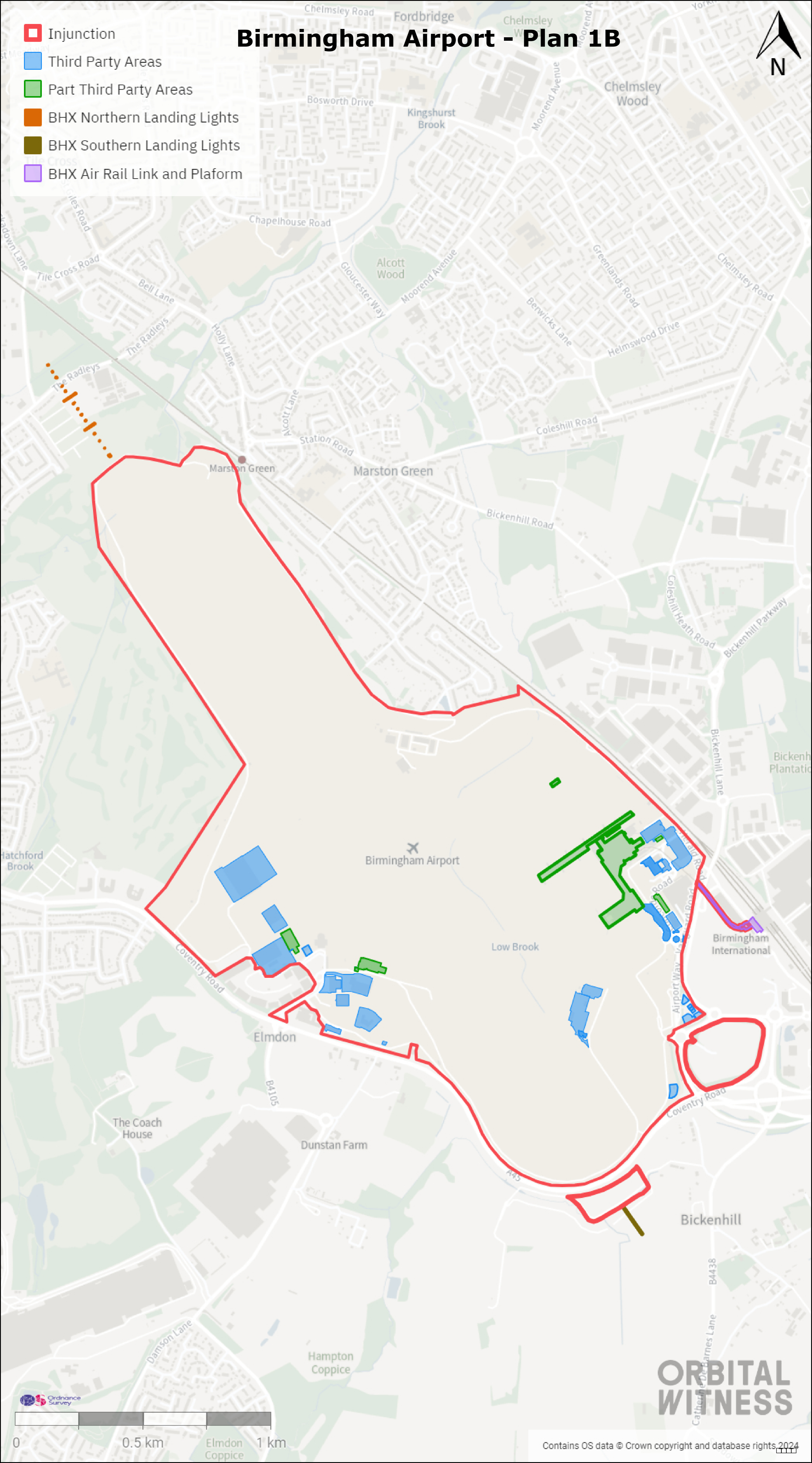


**ORBITAL  
WITNESS**

# Birmingham Airport - Plan 1B



-  Injunction
-  Third Party Areas
-  Part Third Party Areas
-  BHX Northern Landing Lights
-  BHX Southern Landing Lights
-  BHX Air Rail Link and Platform

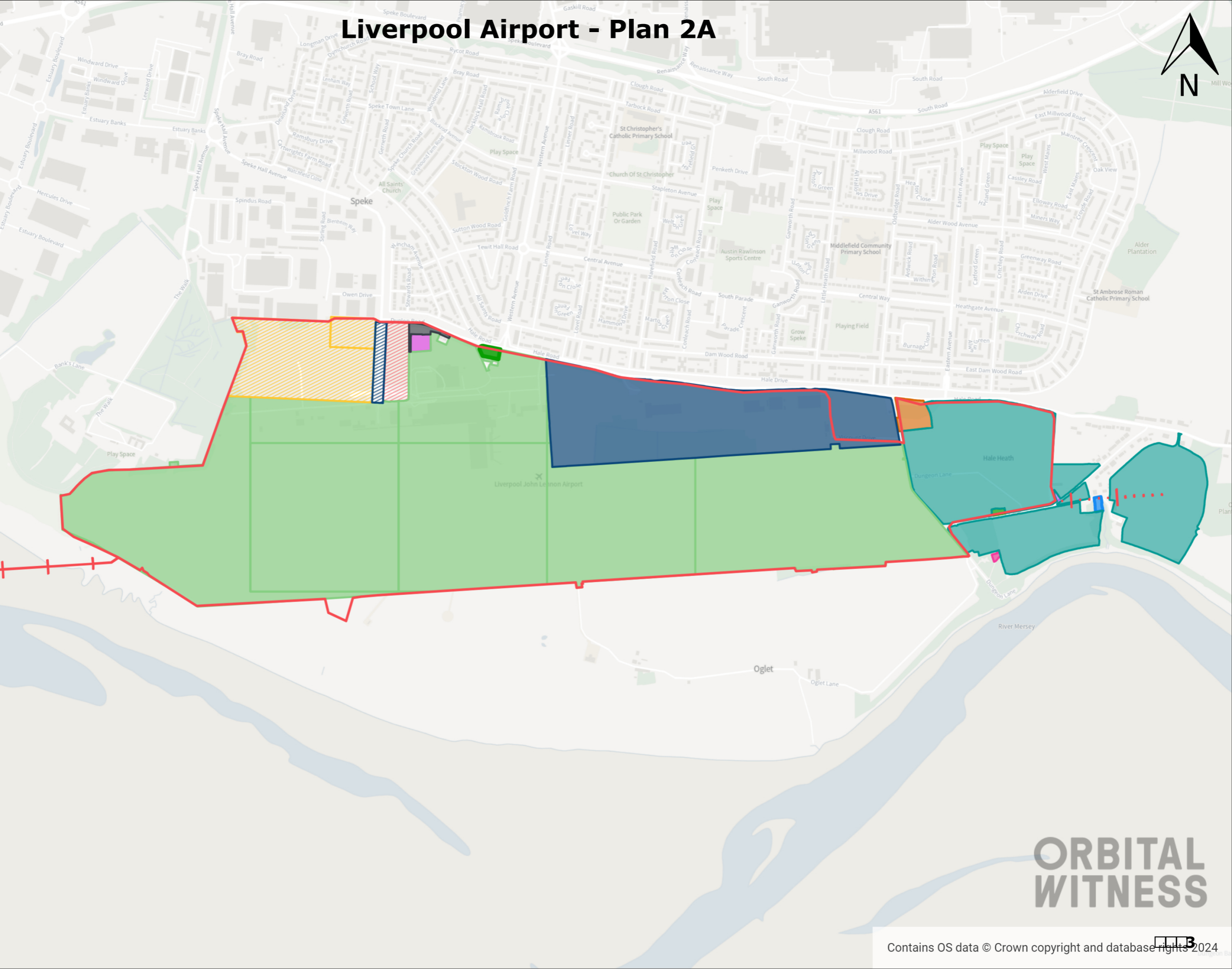


**ORBITAL WITNESS**

# Liverpool Airport - Plan 2A



- CH384543
- CH384582
- CH418034
- CH577106
- CH577117
- CH596568
- MS294425
- MS297001
- MS307564
- MS321998
- MS402558
- MS436566
- MS447440
- MS517785








**ORBITAL  
WITNESS**



# Liverpool Airport - Plan 2B



-  Injunction
-  Third Party Areas
-  Part Third Party Areas
-  LJLA Western Landing Lights
-  LJLA Eastern Landing Lights
-  Public Highways

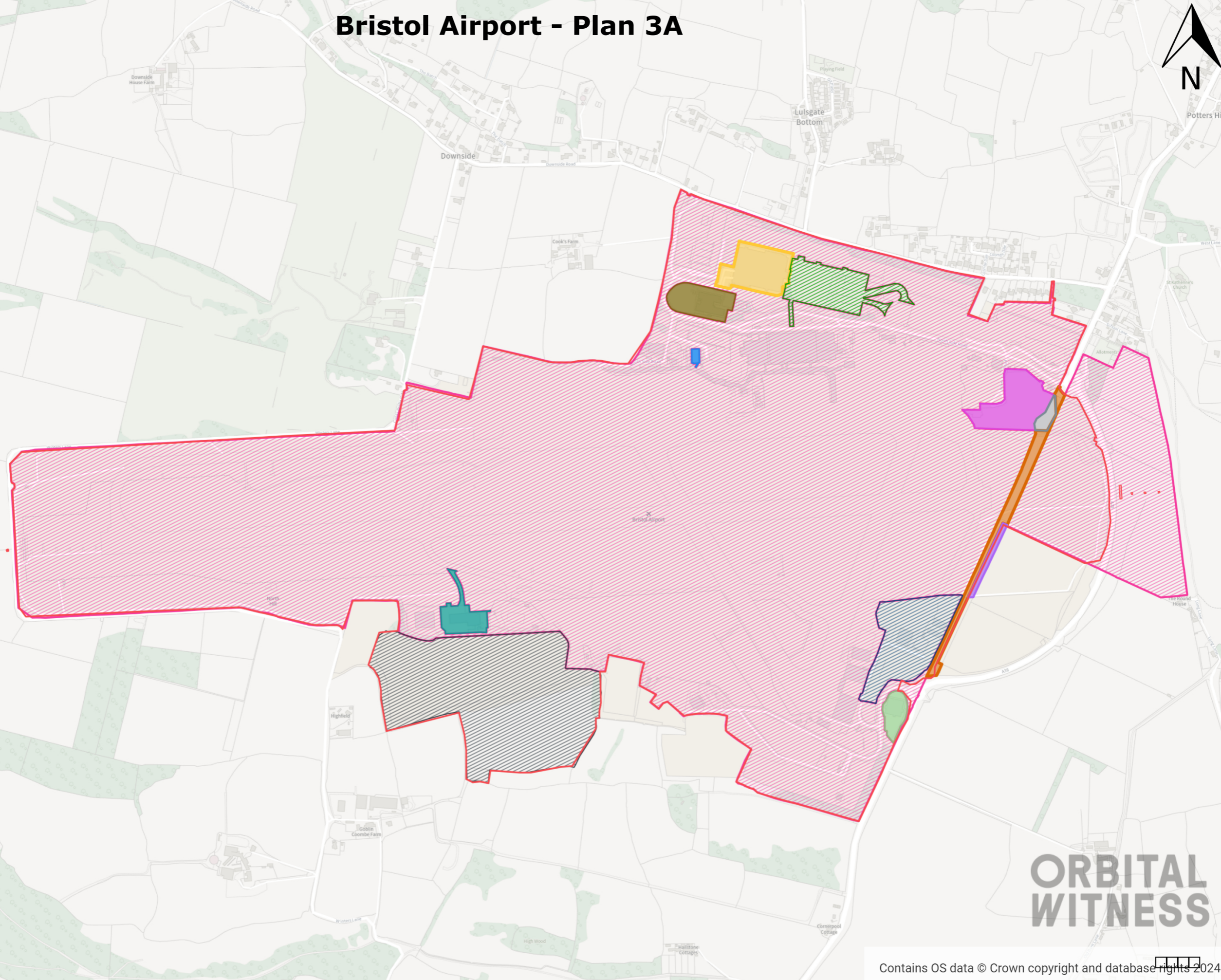


**ORBITAL  
WITNESS**

# Bristol Airport - Plan 3A



- ST371655
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- ST351064
- ST337957
- ST355226
- ST355723
- ST358635
- ST358637
- ST359557
- ST370506
- ST370508
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- ST331855




**ORBITAL  
WITNESS**



# Bristol Airport - Plan 3B



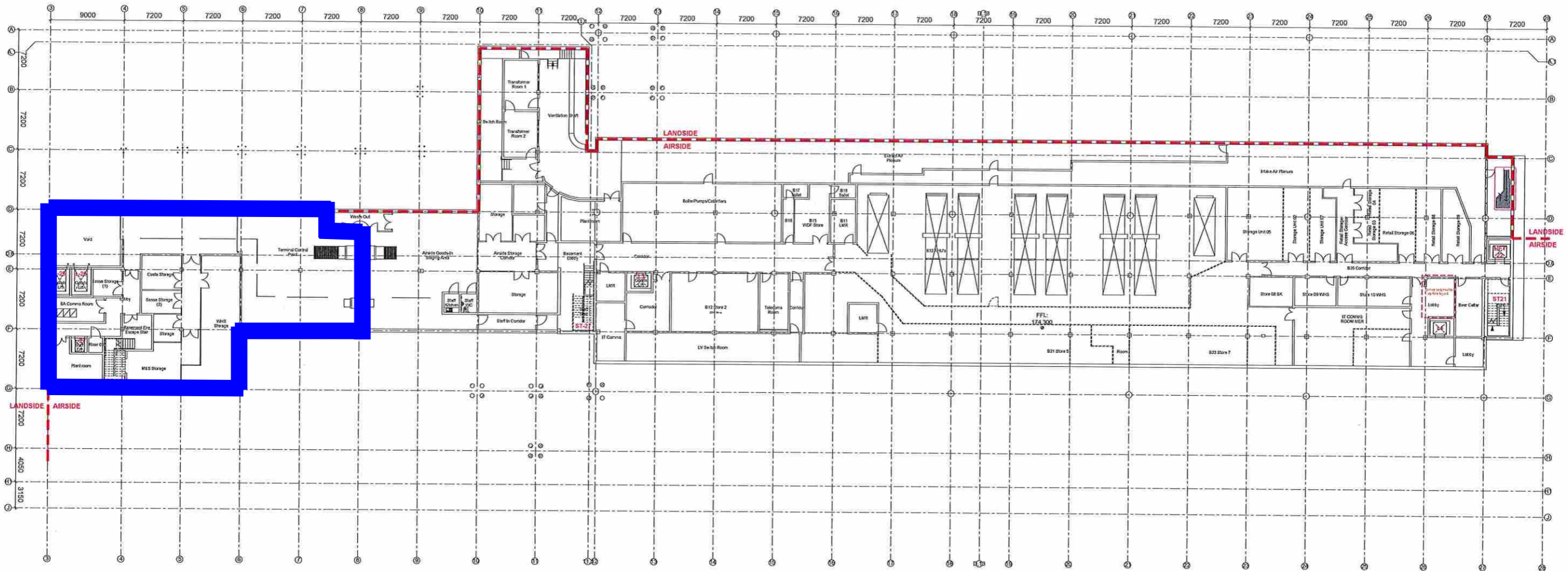
-  Injunction
-  Third Party Areas
-  Part Third Party Areas
-  BRS Western Landing Lights
-  BRS Eastern Landing Lights




**ORBITAL  
WITNESS**

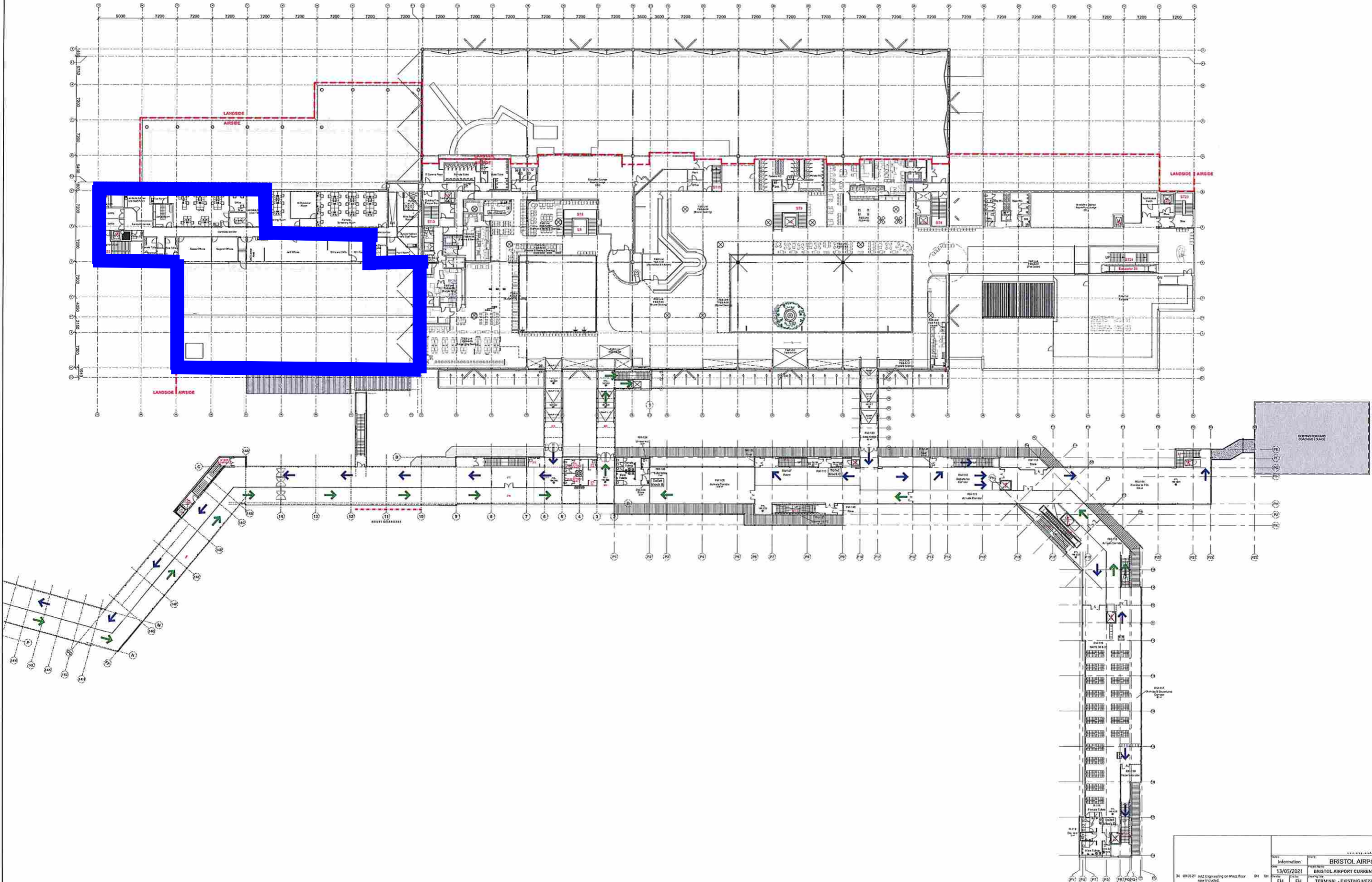


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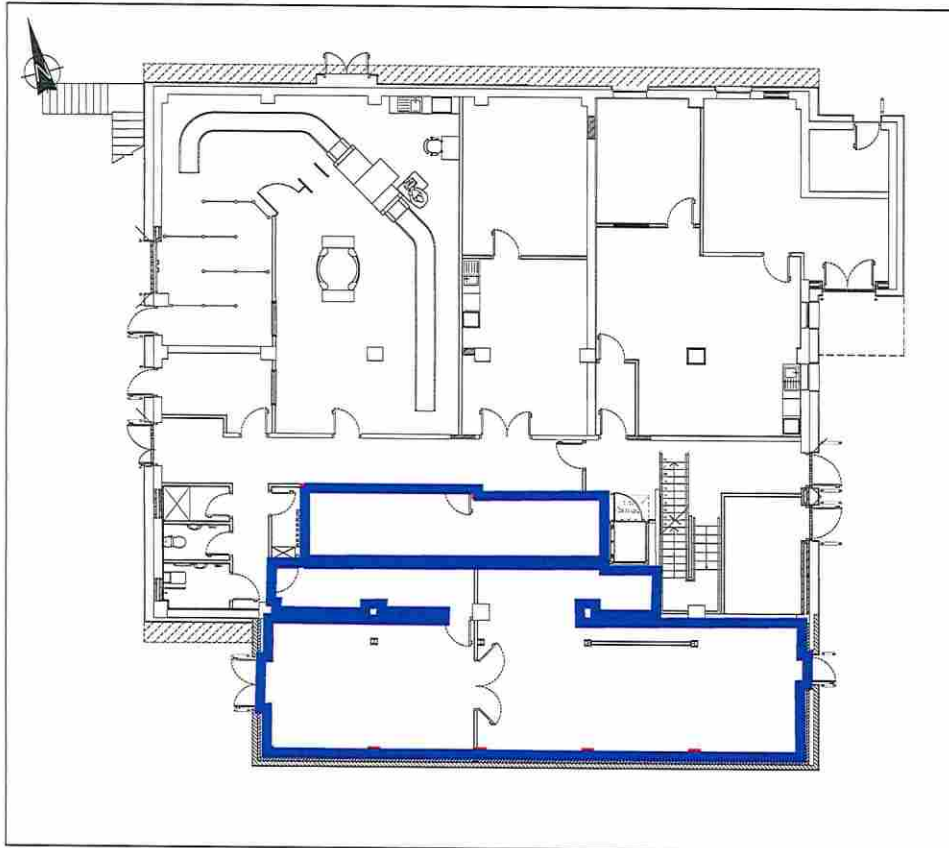
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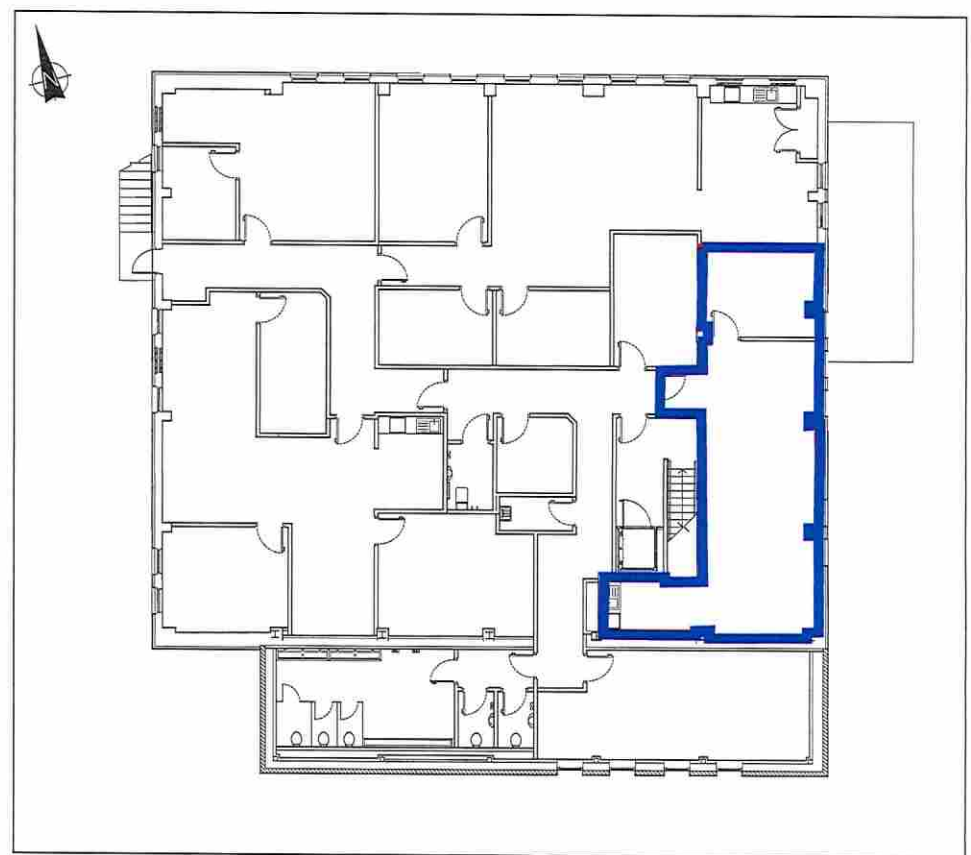
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			11-600 - S2-204

# Bristol Airport Northside House - Plan 3E



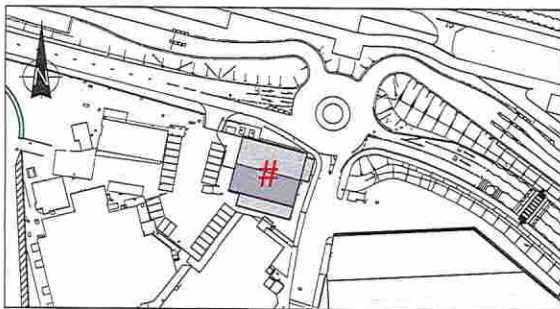
**LEASE PLAN - NSH GROUND FLOOR LEVEL**

Scale 1:250



**LEASE PLAN - NSH FIRST FLOOR LEVEL**

Scale 1:250



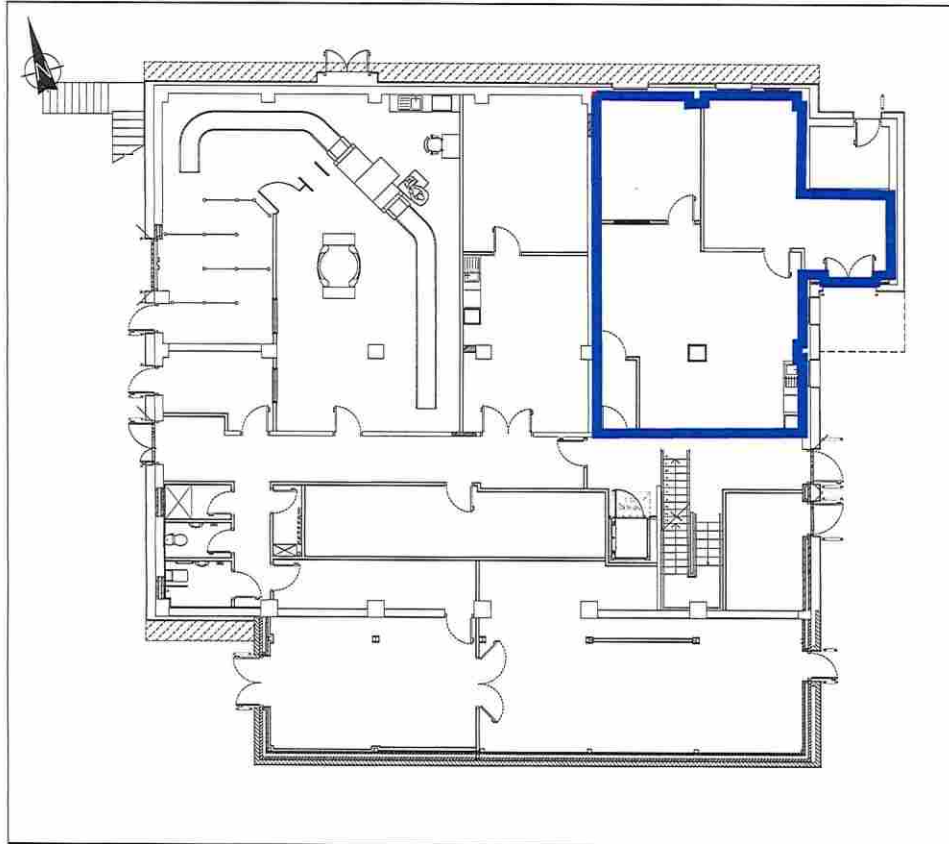
**SITE REFERENCE PLAN**

Scale 1:2500

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— DENOTES LEASE DEMISE TOTAL DEMISE AREA: <b>195.5m<sup>2</sup></b>		Status: INFORMATION Client: BRISTOL AIRPORT			
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		Dwn by: MM    Ckd by: EH Drawing Title: SR TECHNICS			
		Scale: VARIES    Page: A4 Drawing No: <b>18034 - LE2-01</b>		Revision: <b>0</b>	
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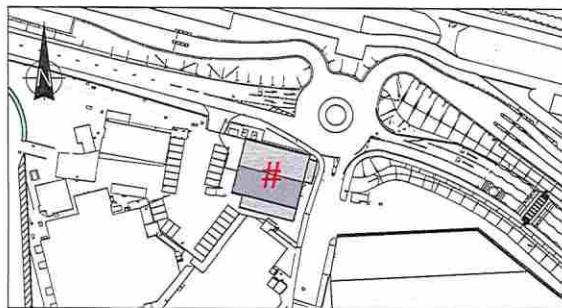


# Bristol Airport Northside House - Plan 3F



**LEASE PLAN - NSH GROUND FLOOR LEVEL**

Scale 1:250



**SITE REFERENCE PLAN**

Scale 1:2500

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		<p>Status: <b>INFORMATION</b></p> <p>Date: <b>30/04/2019</b></p> <p>Dwn by: <b>MM</b> Ckd by: <b>EH</b></p> <p>Scale: <b>VARIES</b> Page: <b>A4</b></p>			<p>Client: <b>BRISTOL AIRPORT</b></p> <p>Project Name: <b>NORTHSIDE HOUSE REFURB</b></p> <p>Drawing Title: <b>TUI</b></p>
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