

Party: Claimants
Name: S S Wortley
Number: Third
Date: 06.06.25
Exhibits: "SSW15" – "SSW20"

CLAIM NO: KB-2024-2473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

and

**PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM**

Defendants

**WITNESS STATEMENT OF
STUART SHERBROOKE WORTLEY**

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

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

2. On 06.08.24, Mr Justice Jacobs granted injunctions to restrain the Defendants from entering, occupying or remaining on Birmingham Airport, Bristol Airport and Liverpool Airport (as defined in those Orders) until varied, discharged or extended by further order.
3. Paragraph 2 of the Orders provided for each of those injunctions to be reviewed by the Court on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2.5 hours and permitted the Claimants to file and serve any evidence in support 14 days before the review hearing.
4. I make this witness statement for the purposes of the review hearing which has been listed on 24.06.25.

2024 Airport Injunctions

5. Between 20 June and 14 August 2024, the following injunctions were granted to protect airports against environmental protestors opposed to the use of fossil fuels.

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

6. Last year it was possible to achieve a certain amount of co-ordination with a view to saving costs and limiting the demands placed by these matters on Court resources, in that my firm acted in 4 out of the 7 actions listed above (numbers 1, 2, 4 and 6). However, our instructions arrived over time rather than all at once, and so multiple hearings were needed, despite the common ground between the different matters.
7. Although the precise terms of the Orders vary slightly, each of the injunctions granted in actions 1, 2, 4 and 6 in the table effectively provides for an annual review.
8. This year, therefore, there is the potential to achieve better co-ordination with a better use of the Court's time: Birmingham, Liverpool and Bristol Airports and the 7 other airports involved in actions 1, 2 and 4 have decided to join together and to ask the Court to undertake the annual review at the same hearing. I was not instructed in relation to the other airports last year (Heathrow, Gatwick and Southend): I believe they remain represented by other firms of solicitors. I understand that the solicitors for Heathrow and Southend Airports have arranged a review hearing sometime next month.
9. As noted above, the Order in this action provided for a review hearing of 2.5 hours duration. The Order in action 1 provided for a review hearing of 1.5 hours duration. The Orders in actions 2 and 4 did not specify a time estimate for the review hearing. The Court has now listed the review hearings in all 4 actions together, with a time estimate of 1 day on 24 June 2025.
10. I make this witness statement in support of the review of the London City Airport injunction. I will be repeating or adopting much of the content of this witness statement in my statements in support of the annual reviews of the injunctions granted in the other actions.

Service of the Order dated 06.08.24

11. Each of the documents required to be served by the Orders dated 06.08.24 was served in accordance with paragraph 4. In each case the last step took place on 09.08.24 @ 10:48 when I sent an email message to the 4 email addresses referred to in Schedule 3 to the Orders.

The Plans

12. The injunctions granted in this action and in actions 2 and 4 in the table above and were based on the relevant airport byelaws (and therefore extend to all of the land which is subject to the Byelaws including land over which the Claimant would not be entitled to legal possession – including for example highways land and areas which are demised to third parties).
13. The injunctions in this case extend to the land edged red on Plan 1 (Birmingham Airport), Plan 2 (Liverpool John Lennon Airport) and Plan 3 (Bristol Airport).
14. I am informed by Kristen Garrett, General Counsel for Birmingham Airport that there have been no changes to the Birmingham Airport Byelaws 2021 and that the Plan attached to the Birmingham Airport Order dated 06.08.24 remains accurate.
15. I am informed by John Irving, Chief Executive Officer of Liverpool John Lennon Airport that there have been no changes to the Liverpool John Lennon Airport Byelaws 2022 and that the Plan 2 attached to the Liverpool John Lennon Airport Order dated 06.08.24 remains accurate.
16. I am informed by Graeme Gamble, Chief Operating Officer of Bristol Airport that there have been no changes to the Bristol Airport Byelaws 2012 and that the Plan attached to the Bristol Airport Order dated 06.08.24 therefore remains accurate.

UK Airport Protests

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

| | |
|----------|---|
| 02.06.24 | Extinction Rebellion conducted a protest at Farnborough Air Show which involved blocking the 3 main gates and parking the Extinction Rebellion pink boat across the Gulfstream gate |
| 20.06.24 | Two JSO activists sprayed 2 aircraft at London Stanstead Airport with orange paint after cutting through the perimeter fence at around 5.00 am |
| 25.06.24 | Four JSO activists were arrested at Gatwick Airport railway station equipped with suitcases containing bandages (suspected to have been |

| | |
|----------|---|
| | intended to force the airport to close owing to the risk of damage to aircraft engines in the event of them being released near aircraft) |
| 27.06.24 | Six JSO activists were arrested at a meeting in London pursuant to powers in the Public Order Act 2023 |
| 19.07.24 | <p>Roger Hallam (along with four other JSO activists) had been found guilty of conspiring to organise protests to block the M25 motorway in November 2022</p> <p>Mr Hallam was sentenced to 5 years imprisonment and each of the others were sentenced to 4 years imprisonment (reduced by the Court of Appeal on 07.03.25 – see below)</p> |
| 24.07.24 | Ten JSO activists were arrested at Heathrow Airport as part of an intelligence led operation - some were equipped with cutting gear and glue |
| 27.07.24 | A protest which was due to be held at London City Airport was relocated to the Department of Transport on Horseferry Lane |
| 29.07.24 | Eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure |
| 30.07.24 | Two JSO activists were arrested at Heathrow Airport after spraying orange paint around the Terminal 5 entrance hall and on the destination boards in the departure lounge |
| 31.07.24 | <p>A protest by JSO and Fossil Free London was held at the Docklands Light Railway station at City Airport</p> <p>JSO and Fossil Free London both uploaded photographs of the protest with the following message:-</p> <p><i>"We've been served with an injunction which means even walking out of the wrong exit of this station could get us arrested."</i></p> |
| 01.08.24 | Six JSO activists blocked access to the departure gates at Heathrow Terminal 5 |
| 05.08.24 | Five JSO activists were arrested on their way to Manchester Airport equipped with bolt cutters, angle grinders, glue, sand and banners carrying slogans including "oil kills". |
| 16.01.25 | The trial of the two JSO activists arrested at Heathrow Airport on 30.07.24 resulted in a hung jury |
| 02.02.25 | Extinction Rebellion held a demonstration at Farnborough Airport following a consultation period in relation to Farnborough Airport's expansion plans which ended in October 2024 |
| 17.02.25 | Extinction Rebellion held a demonstration at Inverness Airport waving banners with <i>"Ban Private Jets"</i> and <i>"We're in a climate emergency, we need to step up and take action"</i> |

| | |
|----------|---|
| 21.02.25 | Of the five JSO activists arrested on their way to Manchester Airport on 05.08.24, four were found guilty of conspiracy to commit a public nuisance and one was acquitted with sentencing adjourned to 23.05.25 |
| 07.03.25 | <p>The Court of Appeal delivered judgment in a conjoined appeal by sixteen JSO activists against sentencing</p> <p>Two of the sentences passed on 19.07.24 were reduced by 18 months (from 4 years to 30 months), the other three were reduced by a year (from 5 to 4 years in Roger Hallam's case and from 4 to 3 years in the other two)</p> <p>Of the other eleven appeals, one was reduced by 2 months but the other ten appeals were dismissed</p> |
| 20.03.25 | Of the ten JSO activists arrested at Heathrow Airport on 24.07.24, nine were found guilty of conspiracy to cause a public nuisance at Heathrow Airport with sentencing adjourned to 16.05.25 |
| 27.03.25 | Just Stop Oil announced the end of their campaign (see below) |
| 27.03.25 | <p>On the same day as the JSO announcement, Youth Demand held a meeting to discuss issues including the climate crisis and a fresh wave of civil resistance in London in the Westminster Quaker Meeting House</p> <p>Six individuals were arrested</p> |
| 27.04.25 | <p>Youth Demand activists threw bright pink powder over elite runners participating in the London marathon as they crossed Tower Bridge</p> <p>The individuals taking part wore T-shirts that read "Youth Demand – Stop Arming Israel" – which appears to be their primary cause</p> |
| 16.05.25 | Of the nine individuals convicted on 20.03.25, five were sentenced to terms of imprisonment of up to 15 months and four were given suspended sentences |
| 27.05.25 | Each of the four individuals convicted on 21.02.25 was sentenced to a term of imprisonment of between 18 and 30 months |

18. Copies of media articles relating to the events recorded in this table are attached to this statement marked "**SSW15**".
19. A copy of the Court of Appeal decision handed down on 07.03.25 is attached at "**SSW16**".
20. The fact that the protest on 27.07.24 was relocated from London City Airport to the Department of Transport and the fact that the JSO and Fossil Free London protestors conducted their protest from outside the red line of the injunction plan demonstrate that the injunction granted by Mr Justice Julian Knowles in that case on 20.06.24

served its purpose. In both instances peaceful protests were went ahead but without causing unlawful interference to users of London City Airport.

27.03.25 – JSO Announcement

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

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

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

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

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

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

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

ENDS"

22. Copies of media articles relating to this announcement and to the "final" JSO protest which took place in central London on 26.04.25 are attached marked "**SSW17**".

18.05.25 - We are "plotting a very big comeback"

23. Whilst the announcement referred to above suggests that the risk of unlawful protests at UK airports has reduced, on 18.05.25 the following story appeared on GB News (both on television and on-line):-

"Now, I was getting pretty bored of the juvenile antics at the altar of climate change.

We've seen it all vandals throwing soup over priceless artworks in galleries, defacing Stonehenge, ambushing theatre productions in the West End, blocking traffic, scaling motorway gantries, dousing private jets in paint, and even disrupting sports events all just to spoil the fun for everyone else.

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

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

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

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

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

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

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

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

But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to

proceed with Just Stop Oil's revival, including talk of keeping protesters in safe houses to maintain morale.

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

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

So, who's paying to bus these protesters from London to Stonehenge, to airports, to art galleries and sports stadiums? Who's funding the Just Stop Oil safe houses where these scruffy, self-righteous agitators meticulously plan how to make Britain colder and poorer?

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

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

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

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

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

25. Copies of the GB News story and the JSO message to subscribers are attached to this message marked **"SSW18"**.

Other Environmental / Climate Campaign Groups

26. There are other protest groups who are opposed to the use of fossil fuels including for example, Youth Demand (the junior branch of JSO formerly known as Youth Climate Swarm), Extinction Rebellion and Fossil Free London.
27. Extinction Rebellion ("XR") remains an active organisation both in the UK and internationally:-

- 27.1. on 07.09.24, XR activists chained themselves to the gates of the Rijksmuseum in Amsterdam in an attempt to force the museum to sever ties with ING Bank;
- 27.2. on 25.09.24, XR activists covered the Finnish Parliament House with red paint;
- 27.3. on 23.05.25, XR activists held a climate protest against Total Energies and its partners – including the occupation of BNP Paribas' offices in Paris.
28. Fossil Free London is another protest group involved in direct action. Their website includes videos which promote the right protest and training videos relating to direct action.
29. A relatively new organisation which is campaigning against the fossil fuel industry is "shut the system". In January 2025, this group cut fibre optic cables to Lloyds of London and prominent buildings involved in the insurance sector on Fenchurch Street, Threadneedle Street, Leadenhall Street and Lime Street in London (and in Birmingham, Leeds and Sheffield).
30. An article concerning this story is attached to this statement marked "**SSW19**".

Police Advice

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

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

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

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

33. I believe the references to "... *your experiences* ..." is a reference to the events referred to in paragraph 19 above – including the fact that one of the protests due to take place at London City Airport was relocated to the Department of Transport.
34. A copy of the email (from which I have redacted personal information) is attached to this statement marked "**SSW20**".

Conclusion

35. I am informed by Kristin Garrett, John Irving and Mark Hunt and believe the Claimants' directors have concluded that they should ask the Court to extend the injunction for a further 12 months from June 2025. I understand that they reached this decision after having considered carefully whether the threat which was clearly present last year has abated materially, especially in light of the JSO announcement in March.
36. Obviously, the question of whether the injunction has outlasted its need, is one for the judgment of the Court. However, based on the material to which I have referred, the Claimants (and, for what it is worth, I also) consider that there remains a compelling need for the injunction to remain in place. Climate change remains firmly on the political agenda. It continues to attract strong feelings and is still a subject about which campaigners are willing to contemplate disruptive action. The inference drawn by the Claimants (and by me) is that the injunctions granted over time have influenced the pattern of protest, which disruptive action being focused principally on targets which do not have the benefit of the Court's protection by way of injunction. The Claimants (and I) consider that the risk remains high that airports generally, including theirs, would come back into focus, if the injunction were now to be lifted. JSO's seeming change of heart in March 2025 was not adopted by all other campaign groups; and even as a statement of JSO's position, later events have shown that it was not an immutable repudiation of disruptive protest. The Claimants (and I) cannot discount the possibility, that JSO's March 2025 announcement may have been partly tactical: to make renewal of the injunctions harder — and disruptive protest at the airports correspondingly less risky. The risks are especially acute at this time of year: most of the incidents in which UK airports were targeted by environmental protestors in 2024 occurred between late June and August 2024 - the busiest period for holiday travel.

Notice of the Review Hearing

37. The Claimants intend to give notice of the review hearing in the manner provided for in para 4 of Order dated 06.08.24 – namely by:-

37.1. Uploading a copy of the application dated 02.06.25, the draft Order, a copy of this witness statement and exhibits and details of the review hearing to each of the injunction websites;

37.2. sending copies of the documents referred to in the previous paragraph to the email addresses referred to in Schedule 3 to the Order dated 18.07.24 plus the following additional email addresses (noting that "Shut The System" does not operate a website and although "Fossil Free London" does have a website, this does not include an email address):-

YouthDemandPress@protonmail.com

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

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

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

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



Stuart Sherbrooke Wortley

6 June 2025