

Party Name	Claimant
No. of statement	G J Robertson
Exhibits	First
Date	"GJR1"
	4 July 2025

**IN THE HIGH COURT OF JUSTICE**  
**KING'S BENCH DIVISION**

**Claim no. KB-2024-002336**

**B E T W E E N :**

**GATWICK AIRPORT LIMITED**

**Claimant**

**-and-**

**PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT  
FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE  
PREMISES AT LONDON GATWICK AIRPORT SHOWN OUTLINED IN YELLOW AND  
SHADED YELLOW ON PLAN 1 ATTACHED TO THE CLAIM FORM (WHETHER IN  
CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION  
CAMPAIGN OR OTHERWISE)**

**Defendants**

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**WITNESS STATEMENT OF GRAEME JAMES ROBERTSON**

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I, **GRAEME JAMES ROBERTSON**, of Herbert Smith Freehills Kramer LLP, Exchange House, Primrose Street, London EC2A 2EG **WILL SAY** as follows:

1. I am a Senior Associate in the firm of Herbert Smith Freehills Kramer LLP ("**HSF Kramer**"). I have conduct of this matter on behalf of the Claimant, Gatwick Airport Limited.
2. I make this witness statement in support of the Claimant's application for the review of the injunction order of Ritchie J dated 19 July 2024 (the "**Injunction Order**"). The Claimant invites the Court to order that the Injunction Order remain in full force and effect, subject to minor administrative amendments which I explain below. I am duly authorised to make this statement on the Claimant's behalf.
3. Save where I indicate to the contrary, the facts and matters within this statement are within my own knowledge and are true. Where they are not within my knowledge, I

have identified the source of the information and believe such facts and matters to be true.

4. There is now shown to me a bundle of documents, which I exhibit as "**GJR1**". I confirm that the documents in those exhibits are true copies of the documents. References in this witness statement to the page numbers in GJR1 are in the format **GJR1/x**.

### **Injunction Order and periodic review**

5. By the Injunction Order, the Defendants are forbidden from entering, occupying or remaining on any part of London Gatwick Airport (the extent of which is specified in the Injunction Order) for the purpose of protesting about fossil fuels or the environment, without the prior consent of the Claimant.
6. Paragraph 3 of the Injunction Order provides for periodic review of the Injunction Order on application by the Claimant at intervals not exceeding 12 months. The Claimant's present application is for the first such periodic review.
7. I am informed by the Claimant's in-house legal team that there have been no changes to the London Gatwick Airport Byelaws 1996 from their description in the First Witness Statement of Neil Harvey dated 17 July 2024. I am further informed that the plans at Schedule 1 and Schedule 2 of the Injunction Order remain accurate.

### **Procedural steps following the Injunction Order**

8. Paragraph 4 of the Injunction Order specified the steps required to be taken by the Claimant to serve copies of the Claim Documents (as defined therein) and the Injunction Order on the Defendants, being:
  - a. uploading a copy onto the following website:  
<http://www.gatwickairport.com/injunction.html> (the "**Website**");
  - b. sending an email attaching the Injunction Order to the email addresses listed in Schedule 3 of the Injunction Order (being [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com), [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com), [info@juststopoil.org](mailto:info@juststopoil.org) and [enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk)) stating that a claim has been brought and an application made, and that the documents can be found on the Website; and
  - c. affixing notices in the form of Schedule 5 of the Injunction Order at regular intervals around the perimeter fence and at suitable entrances/exits to London

Gatwick Airport that note where the documents can be found and obtained in hard copy.

9. Pursuant to paragraph 4 of the Injunction Order:

Website

- a. I understand from an email exchange with the Claimant's Digital Communications Manager that the Claimant uploaded copies of the following documents to the Website on 19 July 2024, which were available for viewing in the early hours of the morning of 20 July 2024:
  - i. sealed Injunction Order dated 19 July 2024;
  - ii. sealed Directions Order dated 19 July 2024;
  - iii. signed Amended Claim Form amended pursuant to the Directions Order of Mr Justice Ritchie dated 19 July 2024;
  - iv. signed Amended Particulars of Claim amended pursuant to the Directions Order of Mr Justice Ritchie dated 19 July 2024;
  - v. signed Application Notice dated 18 July 2024;
  - vi. Hearing Bundle filed on 18 July 2024;
  - vii. Witness Statement of Neil Harvey dated 18 July 2024;
  - viii. Exhibit NH1 dated 18 July 2024;
  - ix. First Witness Statement of Julian Pollock dated 18 July 2024
  - x. Exhibit JP1 dated 18 July 2024;
  - xi. Second Witness Statement of Julian Pollock dated 18 July 2024; and
  - xii. Exhibit JP2 dated 18 July 2024.
- b. I understand from the same individual that a sealed version of the Claim Form was uploaded to the Website on 24 July 2024 and became available for viewing in the early hours of 25 July 2024.
- c. On 1 August 2024 I identified that the links to the Third Witness Statement of Julian Pollock dated 19 July 2024 and Exhibit JP3 dated 19 July 2024 were not live on the Website, despite an attempt having been made by the Claimant to upload them on 19 July 2024. The documents were re-uploaded on 1 August 2024 and were available for viewing in the early hours of 2 August 2024.

- d. In preparing this application, on 1 July 2025, a member of my team at HSF Kramer identified that sealed versions of the Amended Claim Form and Application Notice had not been uploaded to the Website, though signed copies had been. Sealed copies of these documents were uploaded and made available for viewing on 2 July 2025.
- e. A screenshot of the Website as at the date of this witness statement is exhibited **[GJR1/20-22]**.

Emails to Just Stop Oil/Extinction Rebellion

- f. On behalf of the Claimant and pursuant to paragraph 4(b) of the Injunction Order, I sent emails to the email addresses listed in Schedule 3 of the Injunction Order on the morning of 20 July 2024 **[GJR1/5-8]**. These emails each attached a PDF copy of the Injunction Order.
- g. On 24 July 2024, I received an email from the email server stating that the email sent to enquiries@extinctionrebellion.co.uk could not be delivered due to "*Recipient server unavailable or busy*" **[GJR1/14]**. On 24 July 2024 I sent a further email to enquiries@extinctionrebellion.co.uk. On 28 July 2024, I received a further message from the email server stating that the email could not be delivered due to "*Recipient server unavailable or busy*" **[GJR1/15]**.
- h. From an internet search carried out during the course of preparing this evidence, I have found out that Extinction Rebellion's website address now appears to be "extinctionrebellion.uk" and their enquiries email address is now "enquiries@extinctionrebellion.uk". I do not know the date on which that change was made. The Claimant will serve a copy of this application and the notice of hearing by email to both enquiries@extinctionrebellion.co.uk and enquiries@extinctionrebellion.uk and seeks to update the reference to the former email address in Schedule 3 of the Injunction Order to the latter as part of its proposed administrative amendments.

Affixing notices

- i. I understand from an email exchange with the Claimant's in-house legal team that the affixing of notices in the form of Schedule 5 of the Injunction Order at regular intervals around the perimeter fence and at suitable entrances/exits to London Gatwick Airport was completed:
  - i. in the South Terminal on 29 July 2024;

- ii. in the North Terminal on 3 August 2024; and
    - iii. around the 14 km perimeter fence on 23 August 2024.
  - j. I understand from an email exchange with the Claimant's in-house legal team that this exercise took until the stated dates because the Claimant adopted a particularly conservative approach to the spacing of the notices. Whilst the Injunction Order requires notices to be affixed "*at regular intervals*" around the perimeter fence, the Claimant opted to display notices at 25 m intervals to accord with the spacing obligation the Claimant is under as regards security signage on its fence line. As a result, the Claimant installed circa 680 notices around the perimeter fence, which had to first be produced by a third-party supplier to ensure that they were sufficiently weatherproof and able to be fixed to the fence in a manner able to prevent them blowing off into the airfield and causing a safety issue.
  - k. Due to the significant time this exercise took, the Claimant intends to adopt a more proportionate approach to hard copy notices for the application notice and notice of hearing for the present application, and for any further order of the Court (if granted). This is described in paragraph 44 of this witness statement.
10. The Claimant filed a certificate of service in respect of each of (i) the Claim Documents and (ii) the Injunction Order on 9 September 2024 **[GJR1/16-19]** confirming the completion of the actions described in paragraph 9 of this witness statement. As per those certificates, the effective date of service of the documents was 23 August 2024.
11. In addition and for completeness:
- a. A copy of the Injunction Order was sent by email by a communications officer of the Claimant to eight Reuters journalists on 22 July 2024 **[GJR1/11]**, pursuant to paragraph 5 of the Injunction Order.
  - b. On behalf of the Claimant I sent emails on the morning of 20 July 2024 to the email addresses at Schedule 3 to the Injunction Order marked for the attention of Roger Hallam, Phoebe Plummer and Indigo Rumbelow **[GJR1/9,10]**, pursuant to paragraph 12 of the Injunction Order.
  - c. Pursuant to paragraph 16 of the Injunction Order, I understand from an email exchange with the Claimant's in-house legal team that the Claimant issued a 'Gatwick Airport Directive' ("**GAD**") (reference GAD517) on 22 July 2024 about

the Injunction Order **[GJR1/12-13]**. A GAD is an announcement circulated by email to all companies that operate at the airport. The Claimant also emailed all entities from which the Claimant receives rent as recorded in its accounting software to inform them of the Injunction Order. The communications asked the recipients to share the copy of the Injunction Order with any additional sub-occupiers or parties sharing possession of which the recipient was aware.

- d. Pursuant to the first undertaking in Schedule 4 to the Injunction Order, I understand from the Claimant's Digital Communications Manager that the note of the hearing on 19 July 2024 was uploaded to the Website on 2 August 2024 and was available for viewing in the early hours of 3 August 2024.

### **Other airport injunctions**

12. So that the Claimant's present application may be properly contextualised, I turn to discuss the status of injunctions at other airports in England.
13. Including the Injunction Order, I am aware from publicly available information on the websites of the respective airports of the following injunctions that have been granted to prevent environmental protesters from disrupting airport operations in England:

**Table 1**

	<b>Airport</b>	<b>Claim number</b>	<b>Date of order</b>	<b>Judge</b>
1	London City Airport	KB-2024-001765	20 June 2024	Knowles J
2	Manchester Airport Stansted Airport East Midlands Airport	KB-2024-002132	5 July 2024	HHJ Coe KC
3	Heathrow Airport	KB-2024-002210	10 July 2024	Knowles J
4	Leeds Bradford Airport Luton Airport Newcastle Airport	KB-2024-002317	18 July 2024	Ritchie J
5	London Gatwick Airport	KB-2024-002336	19 July 2024	Ritchie J
6	Birmingham Airport Bristol Airport Liverpool Airport	KB-2024-002473	6 August 2024	Jacobs J

7	Southend Airport	KB-2024-002596	14 August 2024	Farbey J
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14. I am aware from having reviewed the websites of the airports listed in rows 1, 2, 4 and 6 that a hearing took place on 24 June 2025 before Bourne J at which the injunction orders granted in respect of those airports were reviewed and affirmed subject to minor administrative amendments to provide for those claims to be case managed together at the next periodic review. The orders of Bourne J are exhibited at **[GJR1/24-50]**.
15. I am aware from the Heathrow Airport website that the application hearing in respect of the review of the injunction order granted to Heathrow Airport Limited on 10 July 2024 is listed for 23 July 2025 before a judge to be confirmed.
16. I am not aware whether any application has been filed in respect of a review of the injunction order dated 14 August 2024 of Farbey J granted in respect of Southend Airport.
17. By virtue of the above, the majority of England's major airports have secured the protection of an injunction order until June 2026. Only Heathrow Airport, London Gatwick Airport and Southend Airport are yet to have their injunctions renewed. Subject to the outcome of the review hearings for Heathrow Airport and Southend Airport, if the Injunction Order were not continued for the next 12 months, it would leave London Gatwick Airport particularly exposed as one of (or potentially the only) major UK airport without the protection of an injunction in place. London Gatwick Airport is the second largest airport in the UK after Heathrow Airport. It is the view of the Claimant that such a situation would markedly increase the risk that London Gatwick Airport would be targeted by protesters over the summer months and subsequently. It is likely that many protesters would be aware that they would not face a potential contempt of court and committal proceedings by trespassing at London Gatwick Airport, in comparison to other airports protected by an affirmed injunction.

#### **UK airport protests since the Injunction Order**

18. To assist the Court in considering the subsisting risk to London Gatwick Airport and UK airports more generally, I set out as follows information of which I am aware (which is therefore necessarily non-exhaustive) regarding airport-related protest

activity between the date of the Injunction Order and the date of this witness statement. I am aware of this information from reviewing the evidence filed in support of the review of the injunction orders for the airports in rows 1, 2, 4 and 6 of Table 1 above and from internet research:

- a. Ten Just Stop Oil activists were arrested at Heathrow Airport on 24 July 2024 and were found with glue and angle grinders **[GJR1/52-53]** and **[GJR/81-82]**. One pleaded guilty and eight were subsequently convicted on 20 March 2025 of conspiracy to cause a public nuisance. On 16 May 2025, the defendants received custodial or suspended sentences **[GJR1/81-82]**.
- b. A protest on 27 July 2024 by Fossil Free London and Extinction Rebellion London was forced to relocate from protesting at London City Airport to the Department for Transport on Horseferry Road due to London City Airport having obtained an injunction **[GJR1/51]**.
- c. Eight Just Stop Oil activists were arrested at London Gatwick Airport on 29 July 2024 after they blocked the entrance to the passenger security search area in the South Terminal with suitcases and lock-on devices **[GJR1/56-58]**. All were acquitted in Horsham Magistrates Court on 12 June 2024 due to deficiencies in the prosecution's case – this was publicised on the Just Stop Oil website **[GJR1/94-97]**. In relation to this event:
  - i. The Claimant has not pursued contempt of court proceedings against these individuals because, as described at paragraphs 9 and 10 of this witness statement above, the affixing of notices to the airport's perimeter fence had not been completed by 29 July 2024 and thus service of the Injunction Order had not yet been effected.
  - ii. Given this recent acquittal of individuals that have specifically targeted London Gatwick Airport in the past, the Claimant considers there to be a risk that those considering direct action may be encouraged to target (or not deterred from targeting) London Gatwick Airport.
- d. Two Just Stop Oil activists were arrested at Heathrow Airport on 30 July 2024 after spraying orange paint in the Terminal 5 check-in areas and on departure boards. The trial of these individuals resulted in a hung jury on 16 January 2025 **[GJR1/64-66]**.



- e. A protest was held by Fossil Free London outside the London City Airport DLR station on 31 July 2024. A post by Fossil Free London on the social media platform "X" referenced that they were protesting in that location because of the *"injunction we've been slapped with that bans protest outside the airport"* [GJR1/63].
- f. Seven Just Stop Oil activists were arrested on 1 August 2024 after blocking the entrance to the security area at Heathrow Airport Terminal 5. I am not aware of the outcome of any criminal proceedings against these individuals.
- g. Five Just Stop Oil activists were arrested on their way to Manchester Airport on 5 August 2024 and were found to have bolt-cutters, angle grinders, glue and sand. Four were convicted of conspiracy to intentionally cause a public nuisance on 21 February 2025 and were subsequently sentenced to between 18 and 30 months in prison [GJR1/92-93].
- h. Activists, including those from Extinction Rebellion, Friends of the Earth and Alton Climate Action Network, blocked access to Farnborough Airport on 2 February 2025 in protest at proposed expansion plans [GJR1/67-69].
- i. Extinction Rebellion held a protest at Inverness Airport on 17 February 2025 [GJR1/70-71].
- j. The Metropolitan Police informed London City Airport by email, by reference to a an email containing a report from the Strategic Intelligence and Briefing Team within the National Police Coordination Centre, that an environmental protest group that desired to oppose the Shell AGM on 20 May 2025 was forced to hold its protest at the Shell head office in central London rather than the AGM location at a hotel within the area covered by the Heathrow Airport injunction, to avoid the risk of penalties for breaching that injunction. The view expressed by the Metropolitan Police contact relaying this report was that *"the injunction at [Heathrow Airport] had a real impact on the Shell protest... To remove the injunction now would open up to further protest and whilst [Just Stop Oil] have stepped down there tends to be a cycle of new groups emerging and this can not be ruled out maintaining [the injunction] would be very much recommended."* [GJR1/87-89]. I am aware of this email and the report from the Strategic Intelligence and Briefing Team within the National Police Coordination Centre because it was exhibited to the evidence relied upon in support of the review of the injunction orders for the airports in rows 1, 2, 4 and 6 of Table 1 above.

19. In addition to these events, which have been reported on publicly, I am also aware from discussions with the in-house legal team for the Claimant that:
- a. On 14 February 2025, local group Communities Against Gatwick Noise and Emissions (CAGNE) held a protest near to Perimeter Road South just outside the boundary of London Gatwick Airport land. Police responded and the protesters informed officers that they intended to take some photos and move off, which they subsequently did.
  - b. On 24 February 2025, an unknown group of six individuals were seen by a member of airport staff leaving the South Terminal Arrivals hall with a rolled-up banner and were noted taking pictures of the airport injunction signage. As the banner was rolled up, I understand from the Claimant's in-house legal team that the Claimant could not identify the organisation with which they were affiliated (if any).
20. The above demonstrates the intensive protest activity that took place against airports over the summer of 2024, and which has continued (albeit to a lesser extent) into 2025. Several of the incidents (i.e. those described at paragraphs 18.b, 18.e and 19.b) demonstrate with particular clarity the deterrent effect that an injunction order can have against a dangerous and disruptive form of protest taking place.

### **Developments with Just Stop Oil since the Injunction Order**

21. I note from news coverage that several Just Stop Oil activists were sentenced to significant custodial terms in 2024/25 following a range of protest activity, not limited to airports but also including climbing gantries on the M25 and throwing soup over one of Vincent Van Gogh's 'Sunflowers' paintings. Whilst some of these sentences were reduced on appeal on 7 March 2025 [GJR1/72-74], the reduced sentences remain significant and the majority of activists in the conjoined appeal had their appeals against sentence dismissed.
22. I am aware from other news coverage and the Just Stop Oil website that Just Stop Oil publicly announced the cessation of its activities in March 2025 to take effect from the end of April 2025. A post on its website [GJR1/75-76] dated 27 March 2025 read:

***"Just Stop Oil is hanging up the hi vis***

*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."*

23. However, I am also aware of the report of Ben Leo of GB News on 18 May 2025 [GJR1/83-85], which stated that:

*"[Just Stop Oil] 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.”*

24. I acknowledge that this report is labelled as an 'opinion' and may be slightly hyperbolic. However, I understand from evidence filed in support of the review of the injunction orders for the airports in rows 1, 2, 4 and 6 of Table 1 above that Just Stop Oil subsequently did not refute Mr Leo's assertions, but instead sent an email to supporters **[GJR1/90-91]** that stated:

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


25. That email also referred to a future campaign and encouraged supporters to get involved in practical events with the group:

*"Nothing short of a political and economic revolution is going to get us out of this mess. Just Stop Oil was just the beginning. A new campaign is in the works—one that will build on our knowledge and success as Just Stop Oil and will face the grinding injustice of our political and economic system head on. **We're just getting started. You're here at ground zero of the revolution and we need your support to get it off the ground. Can you donate to make it happen?**"*

*"Do you also want to get involved in a more practical way in building the revolution? Interested in learning the skills needed to organize and build resilient communities and movements? Curious about theories of change and nonviolent resistance? Join us on Saturday 14th and Sunday 15th of June in London as we join forces with Youth Demand for the launch of the Seeds of Revolution training programme. Everyone is welcome, old and young, seasoned veterans and fresh faces. We want to meet you!"*

26. The "Seeds of Revolution training programme" on 14 and 15 June 2025 appears to have been a joint initiative with related protest group Youth Demand, as I have seen a post on the Youth Demand Facebook page advertising the event (described there as "Seeds for Revolution") which includes both group names at the top of the image [GJR1/80]. So far as I am aware, from a search of the Internet, there is nothing further which has been published by either organisation regarding that event or events following it.

27. I note that the 'About us' section of the Just Stop Oil website currently reads [GJR1/111]:

*"Just Stop Oil is a nonviolent civil resistance group in the UK. In 2022 we started taking action to demand the UK Government stop licensing all new oil, gas and coal projects. We have won on this . Civil resistance works.*

*Just Stop Oil ended it's [sic] street campaign in 2025, whilst we continue our resistance in the courts and prisons.*

*A new revolutionary direct action campaign is coming. Help us build what's next."*

28. The donation page of the website reads [GJR1/112]:

*"THERE'S MORE TO COME*

*HELP MAKE IT HAPPEN*

*A new campaign is in the works — one that builds on our success as Just Stop Oil, and faces the grinding injustice of our political and economic system head on. We're just getting started.*

*Will you donate to help make it happen?"*

29. Further, I note from Just Stop Oil's Instagram account that they continue to post regularly, including through joint posts with other organisations including Youth Demand and Palestine Action. On 18 June 2025 Just Stop Oil posted about the prospect of hotter UK summers in the next decade, with the caption **[GJR1/98]**:

*" Over 1000 people died, homes and business burned down, roads melted and train tracks buckled.*

*If we keep burning fossil fuels, it's only going to get worse.*

*Help fund the nonviolent revolution. Link in bio — @just.stopoil"*

### **Other environmental protest groups**

30. Alongside Just Stop Oil, I am aware from publicly available sources on the internet of several other protest groups that are involved in campaigning for environmental purposes.

#### Extinction Rebellion

31. Extinction Rebellion remains an active environmental protest group. From a review of the Extinction Rebellion website, I have seen a post dated 19 June 2025 entitled "A Summer of Action" **[GJR1/99-101]**, which opens with a reference to politicians supporting airport expansion and goes on to state:

*"Rebels are refusing to be silenced. XR local and community groups all over the nations and regions of the UK are getting ready for a summer filled with defiant action. Creative, colourful, bold actions are being planned everywhere – join them, raise your voice in protest this summer.*

*Join in joy or join in despair, but let it be in unity, community, and curiosity. The sun will be a totem that we rally together around, never forgetting that it is a death sentence for millions on the frontlines of climate and ecological collapse.*

*There has never been a more vital time to act. It will be a rebellious summer."*

32. The page invited potential participants to join an online "Prepare for Action workshop" for *"advice on the latest, safety, legal and action support information"*. Further, one of the events listed on the page is a *"march to Oxford Airport [to] say No to Private Jets"* on 5 July 2025.

#### Fossil Free London

33. Fossil Free London is another environmental protest group involved in direct action. Their website states that they *"use direction action, creative stunts, disruption and protest to target key fossil fuel corporations and banks"* [GJR1/113]. As above at paragraph 18 of this witness statement, Fossil Free London has been involved in protests against airport expansion, including in collaboration with Extinction Rebellion.

#### Youth Demand

34. Youth Demand is an organisation that protests both about the conflict in Gaza and the fossil fuel industry. Their website states that until the UK Government ceases all trade with Israel and raises £1 trillion from the *"fossil fuel elite"* to pay damages to countries harmed by fossil fuel burning, the group *"will be in nonviolent resistance against this rigged political system"* [GJR1/114-116].
35. I am aware from news coverage that on 27 April 2025 Youth Demand activists threw bright pink powder on Tower Bridge as runners taking part in the London Marathon were passing [GJR1/78-79].

#### 'Shut the System'

36. I understand 'Shut the System' to be a relatively new organisation that is campaigning against the fossil fuel industry. From news coverage I am aware that it has vandalised the offices and cut fibre optics of branches of financial and insurance institutions including Barclays, Chubb and Lloyds of London – both in central London and around the country [GJR1/54-55].
37. Further, I note the post dated 16 April 2025 on the group's Instagram account [GJR1/77], which states:

***"Our plan and pledge: Shut down the fossil fuel economy***

*We pledge to target property and machinery of the destructive industries owned by the wealthiest and most responsible for the greatest crisis humanity has ever faced. Our strategy is to disable the physical infrastructure of significant carbon emitters; whether emissions occur directly, or through their support for upstream business operations."*

#### Palestine Action and effect on other organisations

38. I note from the website of Palestine Action that it describes itself as a "*direct action movement*" that opposes the Israeli government and its military activity [GJR1/106-110].
39. I am aware from news coverage that, on 20 June 2025, Palestine Action activists broke into RAF Brize Norton and sprayed red paint into the engines of two RAF Airbus Voyager aircraft [GJR1/102-105]. Following this event, the Home Secretary laid a statutory instrument pursuant to the Terrorism Act 2000 to proscribe the group, which was approved by the House of Commons on 2 July 2025 [GJR1/117].
40. I am mindful of the Claimant's duty to give full and frank disclosure and it appears to me from the social media feeds of the organisations discussed above that much of their focus is presently on opposing this proscription and supporting what they characterise as Palestine Action's right to protest. For example, I note that the Instagram accounts for each of Just Stop Oil, Youth Demand, Fossil Free London and Shut the System have posted in recent days in support of Palestine Action.

#### **Conclusion**

41. The question of whether the injunction continues to be necessary is one for the Court. However, in light of the matters discussed above the Claimant remains concerned that there is a subsisting risk of disruptive protester action at London Gatwick Airport. Even if Just Stop Oil's announcement that it is ceasing its activities is accepted without scepticism, this does not prevent 'lone wolf' actors previously involved with or interested in Just Stop Oil from taking their own action, nor does it prevent other environmental protest groups from taking such action. In any case, the content of Just Stop Oil's website indicates that it is intending to continue disruptive action in the future and is preparing for its next campaign. Whilst much of these groups' focus is presently on Palestine Action and its potential proscription, their focus can quickly change and their social media activity already shows that this is not the only subject on which they are actively encouraging action.



42. The Claimant's view is that the injunctions granted have influenced the form of protests that have been staged at and relating to airports and that the risk remains high that airports will come back into focus. If the Injunction Order were now to be lifted, the Claimant's view is that London Gatwick Airport would risk being identified again as a primary target for disruptive action, particularly given that it would be one of few (or perhaps the only) airport not protected by an injunction. Given that the coming summer months are the busiest time for the airport and when the majority of incidents occurred at UK airports last year, the risks are particularly acute and such action could cause particularly severe disruption to holidaymakers.

### **Service of the Claimant's application and notice of the hearing**

43. Pursuant to paragraph 10 of the Injunction Order, the Claimant's application and the notice of hearing will be served on the Defendants by:
- a. uploading a copy of the documents to the Website;
  - b. sending an email to the email addresses in Schedule 3 (and additionally enquiries@extinctionrebellion.uk, per paragraph 9.h of this witness statement) stating that an application has been made and enclosing a link to the Website where the application documents and notice of hearing can be found; and
  - c. affixing notices at regular intervals around the perimeter fence and at suitable entrances/exits to the airport, noting that the application has been lodged, including the notice of hearing and explaining where copies of the documents can be obtained.
44. The Claimant has identified locations in which it intends to affix the hard copy notices and intends to adopt a more proportionate approach than that described in paragraph 9.j above. The locations in which the Claimant intends to affix notices are marked with red squares and blue circles on the plan of the airport exhibited at **[GJR1/23]**. I am informed by a member of the Claimant's operations team that the red squares are where external notices will be mounted and the blue circles are where internal notices at key entrances to the airport will be mounted.
45. In addition, the Claimant will issue a GAD notifying the application and the notice of hearing to all companies that operate at the airport. This GAD will ask recipients to share this information with any additional sub-occupiers or parties sharing possession of which the recipient is aware.

### **Amendments to the Injunction Order**

46. As noted in the Claimant's application notice, the Claimant seeks some minor administrative amendments to the Injunction Order if the Court chooses to continue it, which are explained as follows. The Claimant has filed a draft Order which appends a tracked changes copy of the Injunction Order showing these amendments:
- a. Paragraph 11 should be amended to refer to an updated email address at HSF Kramer which is accessible to those who have conduct of this matter;
  - b. The text under the heading "COMMUNICATIONS WITH THE CLAIMANT" should be amended to reflect the new name of HSF Kramer and to refer to the email address above;
  - c. Schedule 3 should be amended to reflect the current enquiries email address for Extinction Rebellion, as explained in paragraph 9.h of this witness statement above.
  - d. Schedule 5 should be amended to refer to any new order made by the Court as well as the Injunction Order and to confirm where the relevant documents in respect of the Claimant's application can be found. The contact information for HSF Kramer and the relevant individuals with conduct of this matter should also be updated.

### **Statement of Truth**

I believe that the facts stated in this witness statement 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.

**SIGNED**

*Graeme Robertson*  
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**GRAEME JAMES ROBERTSON**

**DATED**

4 July 2025  
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