

Claim No: [...]

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N:-

GATWICK AIRPORT LIMITED

Claimant

-and-

PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON GATWICK AIRPORT (AS SHOWN FOR IDENTIFICATION OUTLINED IN YELLOW AND SHADED YELLOW AND BLUE ON THE PLAN 1 ATTACHED TO THE PARTICULARS OF CLAIM

Defendant

---

HEARING BUNDLE

JULY 2024

---

## INDEX

Tab	Document	Date	Page
1	<b>Claim Form</b>		1
2	<b>Particulars of Claim</b>		6
	Plan 1		14
	Title Schedule		15
3	<b>Application Notice</b>		24
4	<b>Draft Order</b>		29
	Schedule 1 - Plan		33
	Schedule 2 – Claimant's Undertakings		35
	Schedule 3 – Defendant's Email Addresses		36
	Schedule 4 – Warning Notice		37
<b>Witness Statements</b>			
5	<b>Witness Statement of Neil Harvey</b>	18 July 2024	39
6	<b>Exhibit NH1</b>	18 July 2024	56
	Gatwick Airport Byelaws 2015 Reprint	December 1996	57
	Just Stop Oil Homepage – Just Stop Oil		73
	Just Stop Oil activists paint Parliament Square orange in latest protest – Sky News	10 July 2024	77
	Stonehenge sprayed with orange powder paint by Just Stop Oil activists – The Guardian	19 June 2024	79
	Just Stop Oil pair sentenced for Crucible Theatre snooker protest – BBC News	10 July 2024	82
	Just Stop Oil activists found guilty over M25 disruption plans – Morning Star	11 July 2024	86



	Eco mob plot to ruin the summer holidays with activists planning to disrupt flights by gluing themselves to major airport runways – Mail Online	9 March 2024	88
	Just Stop Oil eco-protesters plot campaign of airport disruption in threat to summer holidays – The Standard	21 April 2024	97
	Just Stop Oil Fundraiser – Chuffed		103
	Dozens of campaigners held over alleged airport plans – BBC News	27 June 2024	107
	Arrests made as Just Stop Oil plan summer disruption – Metropolitan Police	28 June 2024	109
	Dozens of Just Stop Oil activists arrested on suspicion of planning to disrupt airports – The Guardian	28 June 2024	113
	We refuse to die for fossil fuels – Just Stop Oil response to police raids resulting in at least 27 arrests – Just Stop Oil	28 June 2024	115
	Munich Airport forced to close for two hours after climate protesters glue themselves to runway – Sky News	18 May 2024	117
	Climate activists blockade Farnborough private jet airport's three main gates – Extinction Rebellion	2 June 2024	120
	Women deny £52k spray paint damage to private jets – BBC News	22 June 2024	124
	Just Stop Oil 'plan to disrupt airports' in a 'sustained period of action' after spray paint attack on Stansted VIP airfield and Stonehenge – Mail Online	21 June 2024	126
	Just Stop Oil Letter to Prime Minister Starmer – Just Stop Oil Press Release	16 July 2024	132
	Extinction Rebellion protester climbs on plane at London City Airport – Sky News	22 October 2019	135
	Email from Sussex Police to GAL re Just Stop Oil/Fossil Free London Protest	15 July 2024	147
<b>7</b>	<b>Witness Statement of Julian Pollock</b>	18 July 2024	149
<b>8</b>	<b>Exhibit JP1</b>	18 July 2024	162
	Plan 1		163

Plan 2		164
Plan 3 - Highways		165
Witness Statement of Benjamin Smith	10 April 2022	166
London City Airport Injunction – Note of Hearing	20 June 2024	171
London City Airport Injunction – Order	20 June 2024	176
Just Stop Oil protesters charged over disruption at Les Misérables – Mail Online	6 October 2023	192
Manchester Airport, Stansted Airport and East Midlands Airport – Note of Hearing	5 July 2024	196
Manchester Airport, Stansted Airport and East Midlands Airport – Order	5 July 2024	201
Heathrow Airport – Note of Hearing	9 July 2024	213
Heathrow Airport – Order	9 July 2024	222



# 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 King's Bench Division	
Fee Account no.	
Help with Fees - Ref no. (if applicable)	H W F - <input type="text"/> <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/>

	For court use only
Claim no.	
Issue date	

Claimant(s) name(s) and address(es) including postcode  
GATWICK AIRPORT LIMITED



Defendant(s) name and address(es) including postcode  
PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON GATWICK AIRPORT (AS SHOWN FOR IDENTIFICATION OUTLINED IN YELLOW AND SHADED YELLOW AND BLUE ON THE PLAN 1 ATTACHED TO THE CLAIM FORM)

Brief details of claim

The Claimant seeks an injunction to restrain the Defendants from acts of trespass and/or private and/or public nuisance on the land outlined and shaded yellow and blue on Plan 1.

Value  
Non-monetary claim

Defendant's  
name and  
address  
for service  
including  
postcode

--

	£
Amount claimed	
Court fee	£626
Legal representative's costs	
<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

*J. Pollock*

- ☐ 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
1 8	0 7	2 0 2 4

Full name

Julian Pollock

Name of claimant’s legal representative’s firm

Herbert Smith Freehills 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

Exchange House

Second line of address

Primrose Street

Town or city

London

County (optional)

Postcode

E C 2 A 2 E G

If applicable

Phone number

+44 (0)20 7374 8000

DX number

DX28 London Chancery Lane

Your Ref.

2162/8118/31068161

Email

julian.pollock@hsf.com; matthew.bonye@hsf.com

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

Claim number:

BETWEEN:

GATWICK AIRPORT LIMITED

Claimant

and

PERSONS UNKNOWN WHO, IN  
CONNECTION WITH THE JUST STOP OIL  
OR OTHER ENVIRONMENTAL  
CAMPAIGN, ENTER OCCUPY OR REMAIN  
(WITHOUT THE CLAIMANT'S CONSENT)  
UPON THAT AREA OF LAND KNOWN AS  
LONDON GATWICK AIRPORT (AS  
SHOWN FOR IDENTIFICATION  
OUTLINED IN YELLOW AND SHADED  
YELLOW AND BLUE ON THE PLAN 1  
ATTACHED TO THESE PARTICULARS OF  
CLAIM)

Defendants

---

## PARTICULARS OF CLAIM

---

1. The Claimant is the operator of London Gatwick Airport, Gatwick RH6 0NP, shown outlined yellow and shaded yellow and blue on Plan 1 annexed to these Particulars of Claim ("**Plan 1**") ("**London Gatwick Airport**" or the "**Airport**"). London Gatwick Airport will serve around 44 million travelling passengers in 2024 and has an annual revenue of approximately £1.1015 billion.
2. The Claimant is the registered proprietor of the land on which London Gatwick Airport is situated as shown outlined in yellow and shaded yellow and blue on Plan 1, through both freehold and leasehold titles as shown in the title schedule hereto, subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.
3. Subject to those interests, the Claimant is entitled to an immediate right of possession, occupation and control of London Gatwick Airport by virtue of its respective titles as shown on the title schedule.



4. Some of the registered titles listed in Part A of the title schedule are subject to intragroup lease and leaseback arrangements. The Claimant granted long leases of various parts of London Gatwick Airport to a group company of the Claimant, Ivy Bidco Limited, for terms of 250 years and Ivy Bidco Limited leased back those areas to the Claimant for a term of 100 years, which are listed in Part B of the title schedule. Subject to paragraph 5 below, the Claimant has an immediate right to possession of those areas.
5. Certain areas within the Claimant's registered freehold and leasehold titles at London Gatwick Airport are subject to sub-leases or other occupational arrangements to third parties (the "**Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Claimant does not assert that it is the person with an immediate right of occupation or possession.
6. The Third Party Areas include certain ancillary units within the airport, such as aircraft hangars, retail units, offices, storage units and warehouses.
7. Nevertheless, access to or from the Third Party Areas by the public from outside the Airport generally involves the use of areas of London Gatwick Airport which remain unencumbered by such arrangements and in relation to which the Claimant remains entitled to possession, occupation and control by virtue of their interests shown in Part A of the title schedule.
8. By virtue of section 63 and 64 of the Airports Act 1986, the Claimant has power to make byelaws with respect to London Gatwick Airport. Pursuant to the Gatwick Airport - London Byelaws 1996 (reprinted in 2015), byelaw 3(17), 3(18) and 3(19), no person is permitted to (a) organise, take part in any demonstration, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the comfort, convenience or safety of passengers or persons using the Airport; (b) display any flags, banners or emblem likely to cause a breach of the peace on any part of the Airport; or (c) intentionally obstruct or interfere with the proper use of the Airport or with any person acting in the execution of his duty in relation to the operation of the Airport.
9. Pursuant to byelaw 3(12), no person is permitted to remain on the Airport after having been requested by a Constable or an Airport Official to leave, and no Constable or Airport Official is entitled to request a person to leave unless he has reasonable grounds to believe that the person has committed or is about to commit a breach of a byelaw or a criminal offence. "Constable" is defined as including any person having the powers and privileges of a constable; "Airport Official" is defined as a person authorised in writing by the Claimant to perform the specified functions under the Gatwick Airport - London Byelaws 1996.

## **The Claimant's Claims**

10. London Gatwick Airport comprises car parks, terminal buildings (with facilities for processing passenger and freight traffic), an inter-terminal shuttle service, piers, retail areas, lounge/café/refreshment areas, border control facilities, air traffic control facilities, security points, customs and excise facilities, runways, taxiways, fire stations, fuel facilities, a police station, management/airline facilities, offices, cargo facilities, hangars and hotels. London Gatwick Airport also has a railway station (which is not on land owned or occupied by the Claimant).
11. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking up passengers). Non-travelling individuals also have permission to enter the Airport for the use of landside facilities, for example shops and restaurants. Others with lawful business 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 contractor and/or lawful licensees/invitees/agents of such persons.
12. No wider consent subsists and no public right of access or right of way subsists over London Gatwick Airport.
13. In particular, no person has the Claimant's consent to enter, remain on or occupy London Gatwick Airport for the purposes of protest (whether by taking part in any demonstration, procession, public assembly or otherwise within the perimeter of London Gatwick Airport, or on any onward flight), although the Claimant generally accommodates peaceful and non-disruptive protests. No person has the consent of the Claimant to enter London Gatwick Airport for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.
14. Accordingly, any person entering the Airport for any such purpose is a trespasser; as is any person who, being on the Airport (whether or not having entered with any such purpose) in fact protests.
15. In relation to the Third Party Areas:
  - (1) The Claimant is not (or does not seek to show that it is) entitled to possession sufficient to support a claim in trespass. However, in order for its rights in relation to the other parts of London Gatwick Airport (in relation to which it is 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 London Gatwick Airport generally (as shown outlined in yellow and shaded in yellow on the Plan) and the Third Party Areas within them;

- (2) 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 Claimant's retained land.

### **The Threats**

16. London Gatwick Airport has become an explicit target 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 Claimant identifies and relies on the following non-exhaustive PARTICULARS:
17. 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..."*
18. 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"). At this meeting, a co-founder of Just Stop Oil was reported to have advocated:
- (1) Cutting through fences and gluing themselves to runway tarmac;
  - (2) Cycling in circles on runways;
  - (3) Climbing on to planes to prevent them from taking off;
  - (4) Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.
19. 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?*

20. 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?*

21. 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.***

...

22. On 2 June 2024, Extinction Rebellion environmental activists blocked access to Farnborough Airport.
23. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at Stansted Airport. This included:
- (1) an individual using an angle grinder to cut a hole in the perimeter fence of the airport;
  - (2) two individuals trespassing the perimeter fence; and
  - (3) spray painting two aircraft orange using a fire extinguisher.
24. On 27 June 2024, the Metropolitan Police publicised the arrests of 27 Just Stop Oil supporters planning to disrupt airports across England, including some that the police believed to be "key organisers" for Just Stop Oil.<sup>2</sup> Four of those arrested were at London Gatwick Airport.
25. The four individuals who were arrested at London Gatwick Airport were arrested as they arrived by train to the airport on 25 June 2024. The individuals were carrying

<sup>1</sup> As at 16 July 2024, £24,300 had been raised on this website.

<sup>2</sup> <https://www.bbc.co.uk/news/articles/ce98dqn19plo>

suitcases full of bandages. The working assumption of the police is that either they intended to block toilets to cause flooding damage, or to access the airside areas of the Airport and use the bandages to disrupt the runway.

26. On 15 July 2024, Neil Harvey at the Claimant received an email from the Metropolitan Police warning the Claimant of potential Just Stop Oil protests at locations in England. That email stated that the police considered that potential protests at London City Airport had been deterred by the existence of an injunction in respect of that airport.
27. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will:
  - (1) trespass on London Gatwick Airport; and/or
  - (2) by protest conducted on or from the Third Party Areas, substantially interfere with the ordinary use and enjoyment of the airport so as to cause a nuisance actionable by the Claimant.
28. The Claimant seeks injunctive relief to prevent the apprehended trespasses and private nuisance.
29. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:
  - (1) 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.
  - (2) 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.
  - (3) 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.

- (4) 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 pounds. 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.
- (5) London Gatwick Airport is the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the Claimant is 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, e.g. 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.
- (6) 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.
- (7) Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND the Claimant claims:

1. Subject to periodic review by the Court on application by the Claimant at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Defendants must not, without the consent of the Claimant, enter, occupy or remain upon the land outlined in yellow and shaded in yellow on the Plan.
2. Further or other relief.

TIMOTHY MORSHEAD, KC

EVIE BARDEN

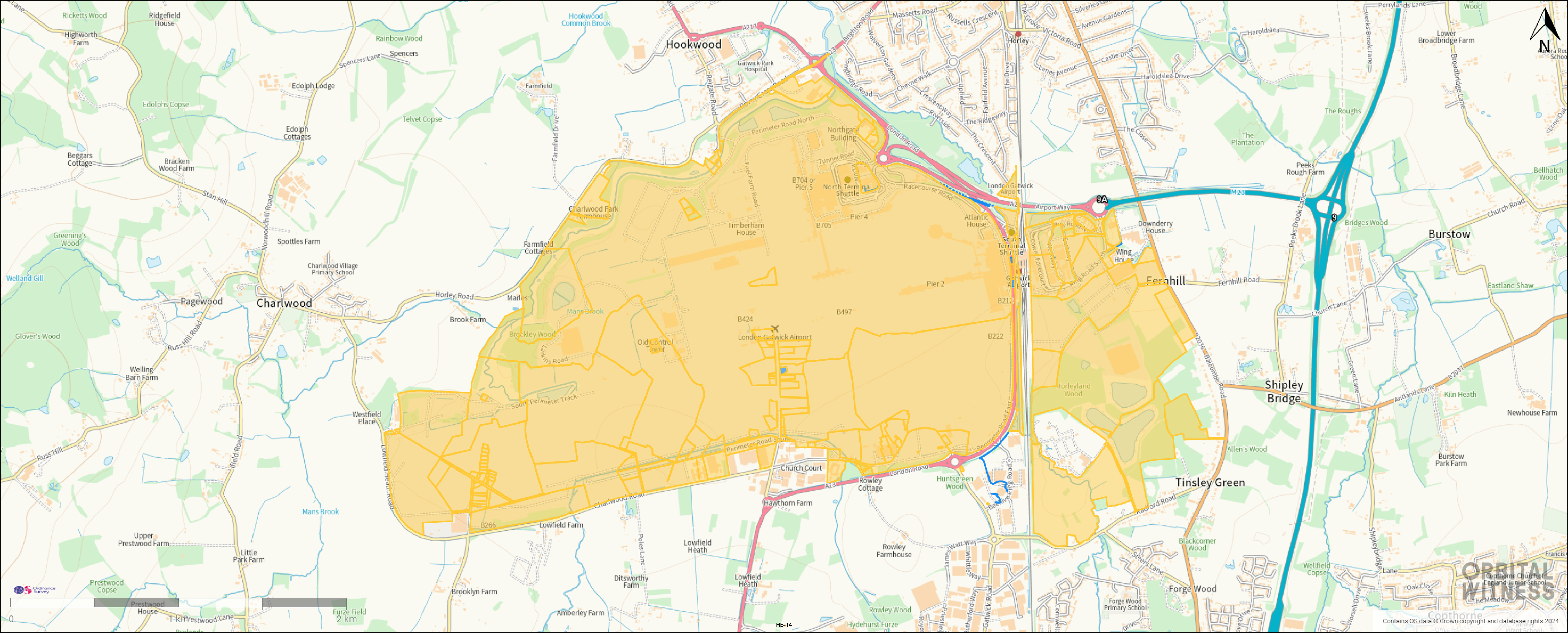
The Claimant believes that the facts stated in these Particulars of Claim are true. The Claimant understands that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: .....  
DocuSigned by:  
*Belen Uamas*  
19CC58F844AB42F...

GATWICK AIRPORT LIMITED

Date: 17-Jul-2024 | 23:23:36 BST





Hookwood

Charlwood

Burstow

Fernhill

Tinsley Green

Shipley Bridge

London Gatwick Airport

Gatwick Park Hospital

Church Court

Hawthorn Farm

Rowley Farmhouse

Huntsgreen Wood

Atlantic House

South Terminal Shuttle

Gatwick Airport

Wing House

Downderry House

Peaks Rough Farm

The Plantation

Haroldslea

Castle Drive

Limes Avenue

The Drive

The Ridgeway

Fairfield Avenue

Wolverton Gardens

Massetts Road

Russells Crescent

The Grove

Victoria Road

Avenue Gardens

Silverlea Gardens

Haroldslea Drive

The Close

The Plantation

Peaks Rough Farm

Peaks Brook Lane

Perrylands Lane

Lower Broadbridge Farm

Broadbridge Lane

Church Road

Eastland Shaw

Belhatch Wood

Clone Oak

Francis

Cothorne Church

Cothorne Junior School

The Meadow

Cothorne

Worsell Drive

Shipley Bridge

Green Lane

Antlands Lane

Kiln Heath

Newhouse Farm

Burstow Park Farm

Allen's Wood

Forge Wood

Forge Wood Primary School

Steers Lane

Blackcorner Wood

Radford Road

B2035

B2036

B2037

B2038

B2039

B2040

B2041

B2042

B2043

B2044

B2045

B2046

B2047

B2048

B2049

B2050

B2051

B2052

B2053

B2054

B2055

B2056

B2057

B2058

B2059

B2060

B2061

B2062

B2063

B2064

B2065

B2066

B2067

B2068

B2069

B2070

B2071

B2072

B2073

B2074

B2075

B2076

B2077

B2078

B2079

B2080

B2081

B2082

B2083

B2084

B2085

B2086

B2087

B2088

B2089

B2090

B2091

B2092

B2093

B2094

B2095

B2096

B2097

B2098

B2099

B2100

B2101

B2102

B2103

B2104

B2105

B2106

B2107

B2108

B2109

B2110

B2111

B2112

B2113

B2114

B2115

B2116

B2117

B2118

B2119

B2120

B2121

B2122

B2123

B2124

B2125

B2126

B2127

B2128

B2129

B2130

B2131

B2132

B2133

B2134

B2135

B2136

B2137

B2138

B2139

B2140

B2141

B2142

B2143

B2144

B2145

B2146

B2147

B2148

B2149

B2150

B2151

B2152

B2153

B2154

B2155

B2156

B2157

B2158

B2159

B2160

B2161

B2162

B2163

B2164

B2165

B2166

B2167

B2168

B2169

B2170

B2171

B2172

B2173

B2174

B2175

B2176

B2177

B2178

B2179

B2180

B2181

B2182

B2183

B2184

B2185

B2186

B2187

B2188

B2189

B2190

B2191

B2192

B2193

B2194

B2195

B2196

B2197

B2198

B2199

B2200

B2201

B2202

B2203

B2204

B2205

B2206

B2207

B2208

B2209

B2210

B2211

B2212

B2213

B2214

B2215

B2216

B2217

B2218

B2219

B2220

B2221

B2222

B2223

B2224

B2225

B2226

B2227

B2228

B2229

B2230

B2231

B2232

B2233

B2234

B2235

B2236

B2237

B2238

B2239

B2240

B2241

B2242

B2243

B2244

B2245

B2246

B2247

B2248

B2249

B2250

B2251

B2252

B2253

B2254

B2255

B2256

B2257

B2258

B2259

B2260

B2261

B2262

B2263

B2264

B2265

B2266

B2267

B2268

B2269

B2270

B2271

B2272

B2273

B2274

B2275

B2276

B2277

B2278

B2279

B2280

B2281

B2282

B2283

B2284

B2285

B2286

B2287

B22



**Part A**

	<b>Title Number</b>	<b>Tenure</b>	<b>Owner</b>
1.	SY205191	Freehold	Gatwick Airport Limited
2.	SY172159	Freehold	Gatwick Airport Limited
3.	SY153923	Freehold	Gatwick Airport Limited
4.	SY423924	Freehold	Gatwick Airport Limited
5.	SY384984	Freehold	Gatwick Airport Limited
6.	WSX27685	Freehold	Gatwick Airport Limited
7.	WSX27684	Freehold	Gatwick Airport Limited
8.	SY44157	Freehold	Gatwick Airport Limited
9.	SY163448	Freehold	Gatwick Airport Limited
10.	SY137202	Freehold	Gatwick Airport Limited
11.	SY156847	Freehold	Gatwick Airport Limited
12.	SY155793	Freehold	Gatwick Airport Limited
13.	SY137394	Freehold	Gatwick Airport Limited
14.	SY162382	Freehold	Gatwick Airport Limited
15.	SY146021	Freehold	Gatwick Airport Limited
16.	SY175846	Freehold	Gatwick Airport Limited
17.	SY175845	Freehold	Gatwick Airport Limited
18.	SY95665	Freehold	Gatwick Airport Limited
19.	SY149727	Freehold	Gatwick Airport Limited
20.	SY158038	Freehold	Gatwick Airport Limited
21.	SY149728	Freehold	Gatwick Airport Limited
22.	SY135473	Freehold	Gatwick Airport Limited
23.	SY134971	Freehold	Gatwick Airport Limited
24.	SY152992	Freehold	Gatwick Airport Limited
25.	SY142024	Freehold	Gatwick Airport Limited
26.	SY141925	Freehold	Gatwick Airport Limited
27.	SY125557	Freehold	Gatwick Airport Limited
28.	SY154110	Freehold	Gatwick Airport Limited
29.	SY89628	Freehold	Gatwick Airport Limited
30.	SY148889	Freehold	Gatwick Airport Limited

	<b>Title Number</b>	<b>Tenure</b>	<b>Owner</b>
31.	SY301179	Freehold	Gatwick Airport Limited
32.	WSX216146	Freehold	Gatwick Airport Limited
33.	SY143299	Freehold	Gatwick Airport Limited
34.	WSX27683	Freehold	Gatwick Airport Limited
35.	WSX544	Freehold	Gatwick Airport Limited
36.	SY307201	Freehold	Gatwick Airport Limited
37.	WSX27682	Freehold	Gatwick Airport Limited
38.	WSX1904	Freehold	Gatwick Airport Limited
39.	WSX1581	Freehold	Gatwick Airport Limited
40.	SY78432	Freehold	Gatwick Airport Limited
41.	SY20783	Freehold	Gatwick Airport Limited
42.	SY181184	Freehold	Gatwick Airport Limited
43.	SY28216	Freehold	Gatwick Airport Limited
44.	SY145553	Freehold	Gatwick Airport Limited
45.	SY33465	Freehold	Gatwick Airport Limited
46.	SY148094	Freehold	Gatwick Airport Limited
47.	SY77079	Freehold	Gatwick Airport Limited
48.	WSX23355	Freehold	Gatwick Airport Limited
49.	SY147704	Freehold	Gatwick Airport Limited
50.	WSX2942	Freehold	Gatwick Airport Limited
51.	WSX216163	Freehold	Gatwick Airport Limited
52.	WSX227164	Freehold	Gatwick Airport Limited
53.	SY159123	Freehold	Gatwick Airport Limited
54.	SY153373	Freehold	Gatwick Airport Limited
55.	SY158592	Freehold	Gatwick Airport Limited
56.	SY383338	Freehold	Gatwick Airport Limited
57.	SY171190	Freehold	Gatwick Airport Limited
58.	SY237046	Freehold	Gatwick Airport Limited
59.	SY332998	Freehold	Gatwick Airport Limited
60.	SY97924	Freehold	Gatwick Airport Limited
61.	WSX256255	Freehold	Gatwick Airport Limited
62.	SY191929	Freehold	Gatwick Airport Limited
63.	WSX272426	Freehold	Gatwick Airport Limited

	<b>Title Number</b>	<b>Tenure</b>	<b>Owner</b>
64.	WSX241922	Freehold	Gatwick Airport Limited
65.	WSX2144	Freehold	Gatwick Airport Limited
66.	WSX2145	Freehold	Gatwick Airport Limited
67.	SY142553	Freehold	Gatwick Airport Limited
68.	SY114362	Freehold	Gatwick Airport Limited
69.	SY135281	Freehold	Gatwick Airport Limited
70.	WSX28189	Freehold	Gatwick Airport Limited
71.	SY156218	Freehold	Gatwick Airport Limited
72.	SY195914	Freehold	Gatwick Airport Limited
73.	SY168040	Freehold	Gatwick Airport Limited
74.	SY388687	Freehold	Gatwick Airport Limited
75.	WSX4621	Freehold	Gatwick Airport Limited
76.	SY165003	Freehold	Gatwick Airport Limited
77.	WSX41502	Freehold	Gatwick Airport Limited
78.	SY203655	Freehold	Gatwick Airport Limited
79.	SY76788	Freehold	Gatwick Airport Limited
80.	SY135655	Freehold	Gatwick Airport Limited
81.	SY153037	Freehold	Gatwick Airport Limited
82.	SY159799	Freehold	Gatwick Airport Limited
83.	SY142992	Freehold	Gatwick Airport Limited
84.	SY156657	Freehold	Gatwick Airport Limited
85.	SY161305	Freehold	Gatwick Airport Limited
86.	SY134874	Freehold	Gatwick Airport Limited
87.	SY43130	Freehold	Gatwick Airport Limited
88.	SY153849	Freehold	Gatwick Airport Limited
89.	SY155093	Freehold	Gatwick Airport Limited
90.	SY272685	Freehold	Gatwick Airport Limited
91.	SY279565	Freehold	Gatwick Airport Limited
92.	SY431635	Freehold	Gatwick Airport Limited
93.	WSX13944	Freehold	Gatwick Airport Limited
94.	WSX289678	Freehold	Gatwick Airport Limited
95.	SY360476	Freehold	Gatwick Airport Limited
96.	SY156095	Freehold	Gatwick Airport Limited

	<b>Title Number</b>	<b>Tenure</b>	<b>Owner</b>
97.	WSX34011	Freehold	Gatwick Airport Limited
98.	WSX69383	Freehold	Gatwick Airport Limited
99.	WSX273453	Freehold	Gatwick Airport Limited
100.	WSX255592	Freehold	Gatwick Airport Limited
101.	SY143943	Freehold	Gatwick Airport Limited
102.	SY154034	Freehold	Gatwick Airport Limited
103.	SY196661	Freehold	Gatwick Airport Limited
104.	SY157945	Freehold	Gatwick Airport Limited
105.	SY192408	Freehold	Gatwick Airport Limited
106.	SY159518	Leasehold	Gatwick Airport Limited
107.	SY134136	Freehold	Gatwick Airport Limited
108.	SY196667	Freehold	Gatwick Airport Limited
109.	WSX124782	Freehold	Gatwick Airport Limited
110.	WSX216162	Freehold	Gatwick Airport Limited
111.	WSX164137	Leasehold	Gatwick Airport Limited
112.	WSX164638	Leasehold	Gatwick Airport Limited
113.	WSX177948	Leasehold	Gatwick Airport Limited
114.	WSX188006	Leasehold	Gatwick Airport Limited
115.	WSX188007	Leasehold	Gatwick Airport Limited
116.	WSX192668	Leasehold	Gatwick Airport Limited
117.	WSX188008	Leasehold	Gatwick Airport Limited
118.	WSX245307	Freehold	Gatwick Airport Limited
119.	WSX216155	Freehold	Gatwick Airport Limited
120.	WSX216154	Freehold	Gatwick Airport Limited
121.	WSX216148	Freehold	Gatwick Airport Limited
122.	WSX173653	Freehold	Gatwick Airport Limited
123.	WSX216159	Freehold	Gatwick Airport Limited
124.	WSX172261	Freehold	Gatwick Airport Limited
125.	SY198727	Freehold	Gatwick Airport Limited
126.	WSX327223	Freehold	Gatwick Airport Limited
127.	WSX311012	Freehold	Gatwick Airport Limited
128.	WSX187338	Freehold	Gatwick Airport Limited
129.	SY185149	Freehold	Gatwick Airport Limited

	<b>Title Number</b>	<b>Tenure</b>	<b>Owner</b>
130.	WSX321696	Freehold	Gatwick Airport Limited
131.	SY185148	Freehold	Gatwick Airport Limited
132.	WSX6357	Freehold	Gatwick Airport Limited
133.	WSX439958	Leasehold	Gatwick Airport Limited

**Part B**

	<b><u>Title Number</u></b>	<b><u>Tenure</u></b>	<b><u>Owner</u></b>
1.	WSX371815	Leasehold	Ivy Bidco Limited
2.	WSX371881	Leasehold	Ivy Bidco Limited
3.	WSX371888	Leasehold	Ivy Bidco Limited
4.	WSX371889	Leasehold	Ivy Bidco Limited
5.	WSX371890	Leasehold	Ivy Bidco Limited
6.	WSX371895	Leasehold	Ivy Bidco Limited
7.	WSX371897	Leasehold	Ivy Bidco Limited
8.	WSX371902	Leasehold	Ivy Bidco Limited
9.	WSX371905	Leasehold	Ivy Bidco Limited
10.	WSX371907	Leasehold	Ivy Bidco Limited
11.	WSX371911	Leasehold	Ivy Bidco Limited
12.	WSX371912	Leasehold	Ivy Bidco Limited
13.	WSX371915	Leasehold	Ivy Bidco Limited
14.	WSX371916	Leasehold	Ivy Bidco Limited
15.	WSX371919	Leasehold	Ivy Bidco Limited
16.	WSX371920	Leasehold	Ivy Bidco Limited
17.	WSX371921	Leasehold	Ivy Bidco Limited
18.	WSX371922	Leasehold	Ivy Bidco Limited
19.	WSX371925	Leasehold	Ivy Bidco Limited
20.	WSX371926	Leasehold	Ivy Bidco Limited

21.	WSX371927	Leasehold	Ivy Bidco Limited
22.	WSX371928	Leasehold	Ivy Bidco Limited
23.	WSX371929	Leasehold	Ivy Bidco Limited
24.	WSX371930	Leasehold	Ivy Bidco Limited
25.	WSX371931	Leasehold	Ivy Bidco Limited
26.	WSX371932	Leasehold	Ivy Bidco Limited
27.	WSX371934	Leasehold	Ivy Bidco Limited
28.	WSX371935	Leasehold	Ivy Bidco Limited
29.	WSX371937	Leasehold	Ivy Bidco Limited
30.	WSX371938	Leasehold	Ivy Bidco Limited
31.	WSX371939	Leasehold	Ivy Bidco Limited
32.	WSX371940	Leasehold	Ivy Bidco Limited
33.	WSX371942	Leasehold	Ivy Bidco Limited
34.	WSX371943	Leasehold	Ivy Bidco Limited
35.	WSX371944	Leasehold	Ivy Bidco Limited
36.	WSX371945	Leasehold	Ivy Bidco Limited
37.	WSX371947	Leasehold	Ivy Bidco Limited
38.	WSX371948	Leasehold	Ivy Bidco Limited
39.	WSX371950	Leasehold	Ivy Bidco Limited
40.	WSX371953	Leasehold	Ivy Bidco Limited
41.	WSX371954	Leasehold	Ivy Bidco Limited
42.	WSX371955	Leasehold	Ivy Bidco Limited
43.	WSX371956	Leasehold	Ivy Bidco Limited
44.	WSX371958	Leasehold	Ivy Bidco Limited
45.	WSX371959	Leasehold	Ivy Bidco Limited
46.	WSX371960	Leasehold	Ivy Bidco Limited
47.	WSX371961	Leasehold	Ivy Bidco Limited
48.	WSX371962	Leasehold	Ivy Bidco Limited

49.	WSX371964	Leasehold	Ivy Bidco Limited
50.	WSX371965	Leasehold	Ivy Bidco Limited
51.	WSX371966	Leasehold	Ivy Bidco Limited
52.	WSX371967	Leasehold	Ivy Bidco Limited
53.	WSX371968	Leasehold	Ivy Bidco Limited
54.	WSX371972	Leasehold	Ivy Bidco Limited
55.	WSX372028	Leasehold	Ivy Bidco Limited
56.	WSX372030	Leasehold	Ivy Bidco Limited
57.	WSX372516	Leasehold	Ivy Bidco Limited
58.	WSX372520	Leasehold	Ivy Bidco Limited
59.	WSX372521	Leasehold	Ivy Bidco Limited
60.	WSX373825	Leasehold	Ivy Bidco Limited

### **Part C**

1.	WSX372011	Leasehold	Gatwick Airport Limited
2.	WSX372061	Leasehold	Gatwick Airport Limited
3.	WSX372532	Leasehold	Gatwick Airport Limited
4.	WSX371979	Leasehold	Gatwick Airport Limited
5.	WSX371981	Leasehold	Gatwick Airport Limited
6.	WSX371984	Leasehold	Gatwick Airport Limited
7.	WSX371989	Leasehold	Gatwick Airport Limited
8.	WSX371990	Leasehold	Gatwick Airport Limited
9.	WSX371991	Leasehold	Gatwick Airport Limited
10.	WSX371993	Leasehold	Gatwick Airport Limited
11.	WSX371996	Leasehold	Gatwick Airport Limited
12.	WSX371998	Leasehold	Gatwick Airport Limited
13.	WSX371999	Leasehold	Gatwick Airport Limited
14.	WSX372000	Leasehold	Gatwick Airport Limited

15.	WSX372001	Leasehold	Gatwick Airport Limited
16.	WSX372003	Leasehold	Gatwick Airport Limited
17.	WSX372004	Leasehold	Gatwick Airport Limited
18.	WSX372005	Leasehold	Gatwick Airport Limited
19.	WSX372006	Leasehold	Gatwick Airport Limited
20.	WSX372007	Leasehold	Gatwick Airport Limited
21.	WSX372008	Leasehold	Gatwick Airport Limited
22.	WSX372010	Leasehold	Gatwick Airport Limited
23.	WSX372016	Leasehold	Gatwick Airport Limited
24.	WSX372019	Leasehold	Gatwick Airport Limited
25.	WSX372020	Leasehold	Gatwick Airport Limited
26.	WSX372024	Leasehold	Gatwick Airport Limited
27.	WSX372025	Leasehold	Gatwick Airport Limited
28.	WSX372027	Leasehold	Gatwick Airport Limited
29.	WSX372029	Leasehold	Gatwick Airport Limited
30.	WSX372031	Leasehold	Gatwick Airport Limited
31.	WSX372032	Leasehold	Gatwick Airport Limited
32.	WSX372035	Leasehold	Gatwick Airport Limited
33.	WSX372036	Leasehold	Gatwick Airport Limited
34.	WSX372038	Leasehold	Gatwick Airport Limited
35.	WSX372039	Leasehold	Gatwick Airport Limited
36.	WSX372040	Leasehold	Gatwick Airport Limited
37.	WSX372041	Leasehold	Gatwick Airport Limited
38.	WSX372042	Leasehold	Gatwick Airport Limited
39.	WSX372043	Leasehold	Gatwick Airport Limited
40.	WSX372044	Leasehold	Gatwick Airport Limited
41.	WSX372045	Leasehold	Gatwick Airport Limited
42.	WSX372046	Leasehold	Gatwick Airport Limited



43.	WSX372047	Leasehold	Gatwick Airport Limited
44.	WSX372049	Leasehold	Gatwick Airport Limited
45.	WSX372050	Leasehold	Gatwick Airport Limited
46.	WSX372051	Leasehold	Gatwick Airport Limited
47.	WSX372052	Leasehold	Gatwick Airport Limited
48.	WSX372053	Leasehold	Gatwick Airport Limited
49.	WSX372055	Leasehold	Gatwick Airport Limited
50.	WSX372056	Leasehold	Gatwick Airport Limited
51.	WSX372057	Leasehold	Gatwick Airport Limited
52.	WSX372058	Leasehold	Gatwick Airport Limited
53.	WSX372059	Leasehold	Gatwick Airport Limited
54.	WSX372060	Leasehold	Gatwick Airport Limited
55.	WSX372062	Leasehold	Gatwick Airport Limited
56.	WSX372002	Leasehold	Gatwick Airport Limited
57.	WSX372529	Leasehold	Gatwick Airport Limited
58.	WSX372531	Leasehold	Gatwick Airport Limited
59.	WSX373830	Leasehold	Gatwick Airport Limited
60.	WSX372021	Leasehold	Gatwick Airport Limited

# Application notice

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

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

<b>Name of court</b> High Court of Justice (KBD)	<b>Claim no.</b>
<b>Fee account no.</b> (if applicable)	<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"/> <input type="text"/> <input type="text"/>
<b>Warrant no.</b> (if applicable)	
<b>Claimant's name</b> (including ref.) Gatwick Airport Limited	
<b>Defendant's name</b> (including ref.) Persons Unknown as more particularly described in the Claim Form	
<b>Date</b>	

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

Herbert Smith Freehills LLP

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

If you are a legal representative whom do you represent?

Claimant

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

(1) An injunction to restrain the Defendants from entering, occupying or remaining on the land defined in the Particulars of Claim and carrying out such other acts as specified in the draft order; and (2) An order for service of the Claim Form, the Particulars of Claim, the Application Notice, evidence in support and the Order/Injunction by alternative means pursuant to CPR 6.15, CPR 6.27, CPR 81.4(2)(c) and (d).

4. Have you attached a draft of the order you are applying for? ☒ Yes ☐ No
5. How do you want to have this application dealt with? ☒ at a hearing ☐ without a hearing
- ☐ at a remote hearing
6. How long do you think the hearing will last?  Hours  Minutes
- Is this time estimate agreed by all parties? ☐ Yes ☒ No

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

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

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

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

If necessary, please continue on a separate sheet.

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

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

☒ No

## Statement of Truth

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

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

### Signature

*J. Pollock*

- ☐ 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

1 8

Month

0 7

Year

2 0 2 4

Full name

Julian Pollock

Name of applicant's legal representative's firm

Herbert Smith Freehills LLP

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

Partner

Applicant's address to which documents should be sent.

Building and street

Exchange House, Primrose Street

Second line of address

Town or city

London

County (optional)

Postcode

E	C	2	A	2	E	G
---	---	---	---	---	---	---

If applicable

Phone number

+44 (0)20 7374 8000

Fax phone number

+44 (0)20 7374 0888

DX number

DX28 London Chancery Lane

Your Ref.

2162/8118/31068161

Email

julian.pollock@hsf.com; matthew.bonye@hsf.com

Claim No: [...]

**IN THE HIGH COURT OF JUSTICE**

**KING'S BENCH DIVISION**

B E T W E E N:-

**GATWICK AIRPORT LIMITED**

Claimant

-and-

**PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON GATWICK AIRPORT (AS SHOWN FOR IDENTIFICATION OUTLINED IN YELLOW AND SHADED YELLOW AND BLUE ON THE PLAN 1 ATTACHED TO THE PARTICULARS OF CLAIM)**

Defendant

---

**DRAFT ORDER FOR AN INJUNCTION**

---

**PENAL NOTICE**

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND PUNISHED BY A FINE, IMPRISONMENT, CONFISCATION OF ASSETS OR OTHER PUNISHMENT UNDER THE LAW OR YOU MAY BE FOUND TO BE GUILTY OF A CRIMINAL OFFENCE FOR WHICH YOU MAY BE IMPRISONED OR FINED OR BOTH.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND PUNISHED BY A FINE, IMPRISONMENT, CONFISCATION OF ASSETS OR OTHER PUNISHMENT UNDER THE LAW OR YOU MAY BE FOUND TO BE GUILTY OF A CRIMINAL OFFENCE FOR WHICH YOU MAY BE IMPRISONED OR FINED OR BOTH.

**IMPORTANT NOTICE TO THE DEFENDANTS**

This Order prohibits you from doing certain acts. You should read it very carefully. You are advised to consult a solicitor as soon as possible.

If you do not obey this order, you will be guilty of contempt of court and you may be fined, sent to prison, have your assets confiscated or otherwise punished in accordance with the law or may be guilty of a criminal offence for which you may be fined or sent to prison or both.

You have the right to ask the Court to vary or discharge this Order.

## **RECITALS**

**UPON** the Claimant's claim by the Claim Form dated 18 July 2024

**AND UPON** the Claimant's application notice for an injunction dated 18 July 2024

**AND UPON** hearing Leading Counsel for the Claimant and [the Defendants not appearing]

**AND UPON** reading the witness statements of Neil Harvey and Julian Pollock dated 18 July 2024

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

**IT IS ORDERED THAT:**

## **DEFINITIONS**

1. **"London Gatwick Airport"** means the land shown outlined in yellow and shaded yellow and blue on Plan 1 to the Particulars of Claim, appended to Schedule 1 of this Order ("**Plan 1**").
2. **"Warning Notice"** means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address:  
(<http://www.gatwickairport.com/injunction.html> at which copies of this Order may be viewed and downloaded).

## **THE INJUNCTION**

3. With immediate effect, unless varied, discharged or extended by further order, the Defendants and each of them are forbidden, whether by themselves or by instructing or encouraging any other person, from entering, occupying or remaining on any part of Gatwick Airport without the consent of the Claimant.
4. This order is subject to periodic review by the Court on application by the Claimant at intervals not exceeding 12 months.

## **VARIATION OR DISCHARGE OF THIS ORDER**

5. Any person may apply to vary or discharge this Order upon giving 48 hours' notice in writing to the Claimant's solicitors at Herbert Smith Freehills LLP; Exchange House, Primrose Street, London EC2A 2EG (ref Matthew Bonye: tel 0207 466 2162; email [matthew.bonye@hsf.com](mailto:matthew.bonye@hsf.com)).
6. Any person who wishes to vary or discharge this Order must provide their full name and address (an address for service) to the Court and the Claimant's solicitors.

## **INTERPRETATION OF THIS ORDER**

7. A Defendant who is ordered not to do something must not do it him/herself or in any other way. He/she must not do it through another acting on his/her behalf or on his/her instruction or with his/her consent.



## **SERVICE OF THE ORDER**

8. Pursuant to CPR r.6.15 and 6.27 and 81.42(c) and (d), the Claimant shall take the following steps by way of service of copies of the Claim Form and the Application Notice, the Witness Statements and their exhibits and the Particulars of Claim (the "**Claim Documents**") and a note of the hearing on [ ] July 2024:
  - A. Uploading a copy of the Claim Documents to the following website:  
<http://www.gatwickairport.com/injunction.html>.
  - B. Sending an email to the email addresses set out in Schedule 3 this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above:
  - C. Affixing a notice at regular intervals around the perimeter fence and at suitable entrances/exits setting out where these documents can be found.
9. Pursuant to CPR 6.27 and 8.4(2)(c) and (d), this Order shall be served by the Claimant on the Defendants by carrying out each of the following steps:
  - A. By uploading a copy of the Order onto the following website:  
<http://www.gatwickairport.com/injunction.html>.
  - B. Sending an email to the email addresses listed in Schedule 3 of this Order attaching a copy of the Order.
  - C. Affixing a copy of the Order in A4 clear plastic envelopes at regular intervals around the perimeter fence and at suitable entrances/exits.
  - D. Affixing Warning Notices of A2 size at regular intervals around the perimeter fence and at suitable entrances/exits.
10. Pursuant to CPR 6.15, the steps identified in paragraphs 8 and 9 shall be as good service of the Order and the Claim Documents upon the Defendants and each of them.
11. The Court will provide sealed copies of this Order to the Claimant's solicitors for service (whose details are set out below).
12. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 8. The step described at paragraph 8(C) will be completed when those documents are first affixed regardless of whether they are subsequently removed.
13. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 9. The step described at paragraphs 9(C)-(D) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

## **COMMUNICATIONS WITH THE COURT**

14. All communications to the Court about this Order should be sent to: King's Bench Division, Royal Courts of Justice, Strand, London WC2A 2LL. The offices are open between 10.00am and 4.30pm Monday to Friday except bank holidays. The telephone number is 020 7947 6000.

### **FURTHER DIRECTION**

15. Unless otherwise ordered by the Court, service by the Claimant on the Defendants of any application or Order or other document that should be served in these proceedings may be effected by carrying out each of the steps in paragraph 8(A) and 8(B).
16. The Court will consider whether to join the person served to the proceedings as a named Defendant and whether to make any further order.
17. The Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
18. No acknowledgement of service, admission or defence is required by any party unless further so ordered.

### **COSTS**

19. Costs are reserved.

### **COMMUNICATIONS WITH THE CLAIMANTS**

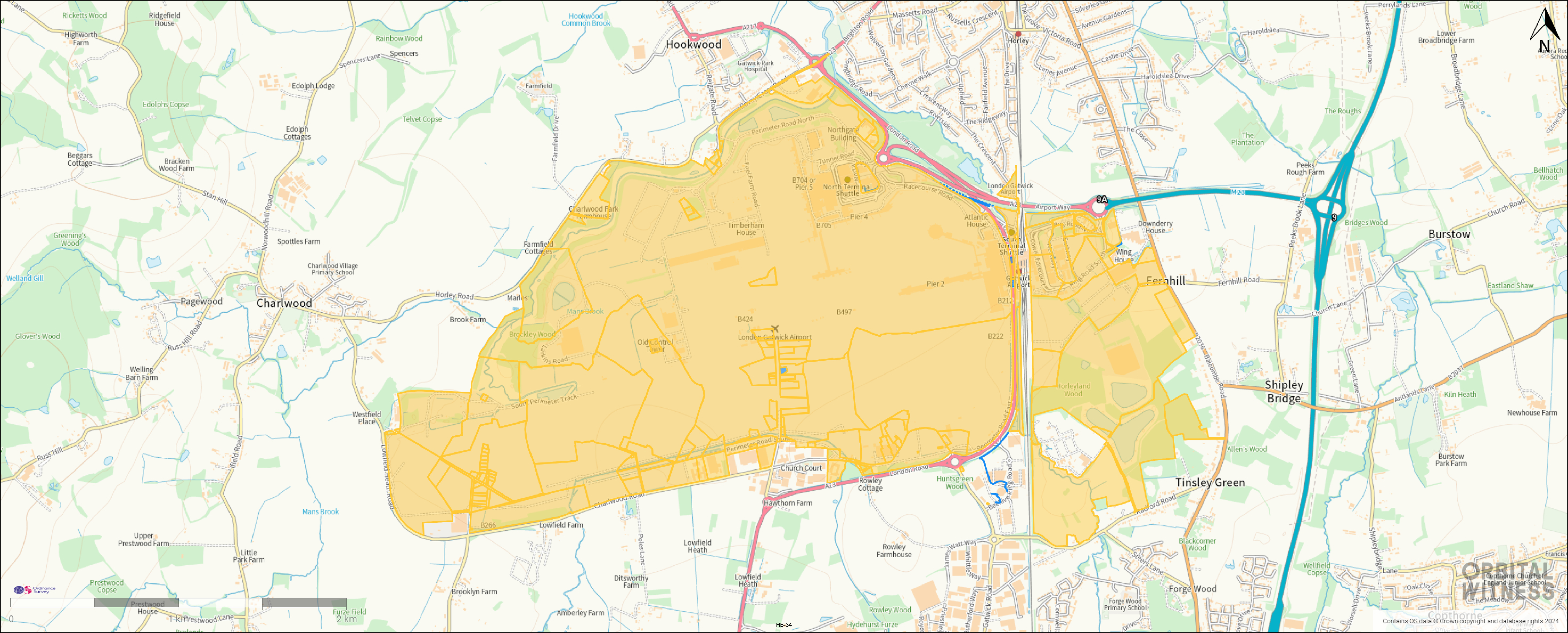
20. The Claimant's solicitors and their contact details are:

Herbert Smith Freehills LLP  
Exchange House  
Primrose Street  
London EC2A 2EG  
Attn: Matthew Bonye/Graeme Robertson  
E: [matthew.bonye@hsf.com](mailto:matthew.bonye@hsf.com); [graeme.robertson@hsf.com](mailto:graeme.robertson@hsf.com)  
02074662162/02074662793

21. The court has sent sealed copies of this order to the Claimant's solicitors.

**SCHEDULE 1: PLAN**







## **SCHEDULE 2: UNDERTAKINGS GIVEN BY THE CLAIMANT**

1. The Claimant will take steps to serve the Defendants with the Claim Documents, a note of the hearing dated [ ] and the Order as soon as practicable.
2. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 3 of this Order has caused a loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

### **SCHEDULE 3 – EMAIL ADDRESSES**

[info@juststopoil.org](mailto:info@juststopoil.org)

[juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)

[enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

## **SCHEDULE 4 – WARNING NOTICE**

HIGH COURT CLAIM NO:

# High Court Injunction in Force

**NOTICE OF HIGH COURT ORDER DATED [ ]**

**TO:** Persons Unknown who, in connection with the Just Stop Oil or other environmental campaign, enter, occupy or remain (without the claimant's consent) upon that area of land known as London Gatwick Airport (as shown for identification outlined in yellow and shaded yellow and blue on the plan 1 attached to this notice (the "**Defendants**")

**FROM:** Gatwick Airport Limited ("the Claimant")

This notice relates to the land known as London Gatwick Airport, Gatwick RH6 0NP which is shown outlined in yellow and shaded yellow and blue on the Plan below (the "**Airport**")

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the Claimant
2. You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

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

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on [ ] may be viewed at: 5th Floor, Destinations Place, Gatwick Airport, Gatwick, West Sussex, RH6 0NP or online at <http://www.gatwickairport.com/injunction.html>. Copies may also be obtained from the Information Desk or by contacting Matthew Bonye of Herbert Smith Freehills LLP at Exchange House, Primrose Street, London EC2A 2EG, on 0207 466 2162 or by email at [matthew.bonye@hsf.com](mailto:matthew.bonye@hsf.com).



Party: C  
Name: N Harvey  
Exhibit: NH1  
Date: 17 July 2024  
Number: 1  
**Claim No: [...]**

**IN THE HIGH COURT OF JUSTICE**

**KING'S BENCH DIVISION**

B E T W E E N:-

**(1) GATWICK AIRPORT LIMITED**

Claimant

-and-

**PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON GATWICK AIRPORT (AS SHOWN FOR IDENTIFICATION OUTLINED IN YELLOW AND SHADED YELLOW AND BLUE ON THE PLAN 1 ATTACHED TO THE CLAIM FORM**

Defendants

---

**WITNESS STATEMENT OF NEIL HARVEY**

---

**I, NEIL HARVEY** of Gatwick Airport Limited, 5<sup>th</sup> Floor, Destinations Place, Gatwick Airport West Sussex RH6 0NP **WILL SAY** as follows:

1. I am Head of Stable Operations at Gatwick Airport Limited. I joined the airport in October 2006 and have held a number of senior leadership roles across security, airside and terminal operations. I became Head of Stable Operations in June 2020 to support the business through the Covid pandemic. My principal role is to ensure the safe and smooth delivery of a very intense airport operation. I am responsible to the operational risk management,

business continuity planning and crisis response. I also look after the Police Service Agreement at the Airport which oversees all public disorder management, on-airport criminality as well as counter-terrorism and co-ordinate with Sussex and Surrey Police to maintain law and order in line with the Airport Byelaws and relevant legislation.

2. As I explain further below, Just Stop Oil, which is an environmental campaign group, has threatened to disrupt operations at airports in England during the summer of 2024. The actions threatened by the Defendants, and the incidents that have already occurred in Munich and London airports (including London Gatwick Airport) this summer, have the goal of disrupting airport operations internationally and in England this year. The Claimant therefore seeks injunctive relief against the Defendants in relation to threatened unlawful direct action at London Gatwick Airport.
3. I make this witness statement in support of the Claimants' application for an injunction to prevent protesters from trespassing and/or cause a public or private nuisance at London Gatwick Airport. I am authorised by the Claimants to give this witness statement on its behalf.
4. I have read the Particulars of Claim and a final draft of the witness statement of Julian Pollock for the Claimant. I adopt the definitions in the Particulars of Claim.
5. Where the facts referred to in this witness statement are within my own knowledge, they are true. Where the facts are not within my own knowledge, I believe them to be true and I have provided the source of my information.
6. I refer to exhibit marked **NH1** in this statement, which is 93 pages. They have been produced to me and I verify that the documents in those exhibits are true copies of the documents. References in this witness statement to the page numbers in **NH1** are marked "[NHx]".

### **Background on London Gatwick Airport**

7. London Gatwick Airport is the second largest airport in the UK (after London Heathrow) and the eleventh largest in Europe. In 2023, it handled over 41 million passengers, which is expected to rise to 44 million in 2024 and 47 million in 2025. On a typical day, Gatwick will handle up to 150,000 passengers and process over 900 air traffic movements. The revenue from the airport in 2023 was £1.015 billion.
8. Members of the general public have permission to enter the airport for the purposes of air travel or directly related purposes (such as dropping off and picking up those who are travelling). Non-travelling individuals also have permission to enter the Airport for the use of landside facilities, for example shops and restaurants. Whilst nobody has permission to enter the airport for the purpose of carrying out a protest or demonstration, and indeed such

action is expressly prohibited by byelaw 3(17) of the London Gatwick Airport Byelaws 1996 (the "**Byelaws**") [NH2-NH17], peaceful and non-disruptive protests are generally accommodated. Byelaw 3(18) prohibits the display of flags, banners or emblems likely to cause a breach of the peace on any part of the airport and byelaw 3(19) prohibits the intentional causing of an obstruction or interfering with the proper use of the airport or a person acting in the execution of his duties in relation to the operation of the airport.

9. Any person visiting London Gatwick Airport (including employees and members of the public) is subject to the Byelaws. Section 64 of the Airports Act 1986 provides that any person contravening any byelaws made under section 63 commits a criminal offence in doing so and is liable on summary conviction to a maximum fine of £2,500.

### **Statutory Obligations**

10. The Claimant is the person which has the management of London Gatwick Airport, for the purposes of being an "airport operator" under the Airports Act 1986.
11. Airports in the UK are subject to a significant amount of regulation, the following of which are relevant:
  - 11.1 Because it is engaged in commercial operations, has paved runways of 800 metres and more are open to the public, London Gatwick Airport is required to be certificated by the Civil Aviation Authority ("the CAA") by Article 2 and 34(1) of the Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 ("the 2018 Regulations"). This was assimilated into English law from 31 December 2020 by virtue of the European Union (Withdrawal) Act 2018.
  - 11.2 Article 33, Annex VII of the 2018 Regulations provides the requirements for an airport and the operation of it. By Annex VII, the aerodrome operator is responsible for, among other things, ensuring the safe operation of aircraft at the aerodrome (paragraph 2.1(a)); taking appropriate measures to mitigate the risks of non-compliance with the responsibility to ensure the safe operation of aircraft (paragraph 2.1(b)); ensuring that the movements of vehicles and person in the movement area and other operational areas are coordinated in order to avoid collisions and damage to aircraft (paragraph 2.1(d)); ensuring that adequate aerodrome rescue and firefighting services are provided and that they respond to an incident or accident with due urgency (paragraph 2.1(j)); ensuring that any person permitted unescorted access to the movement area or other operational areas is adequately trained and qualified for such access (paragraph 2.1(l)); safeguarding the airspace around the aerodrome movement area from obstacles so as to permit the intended aircraft operations without creating an unacceptable risk by development of obstacles around the airport (paragraph 3.1.1); removing objects posing an unacceptable

risk or taking appropriate mitigating action to protect aircraft using the aerodrome (paragraph 3.1.2); and monitoring hazards related to human activities and land use and mitigating the risk caused by them as appropriate, including developments or change in land use in the aerodrome area (paragraph 3.2).

- 11.3 In order to be certificated, the airport must comply with the features set out in the Commission Regulation (EU) No 139/2014 (the "**2014 Regulations**"). London Gatwick Airport holds certificates from the CAA.
- 11.4 By article 1(3) and (4) of the 2014 Regulations, London Gatwick Airport is required to comply with Annex III and IV. Those mean that:
  - 11.4.1 the Claimant is responsible for the safe operation and maintenance of the aerodrome in accordance with Regulation (EC) No 216/2008 and its Implementing Rules; the terms of its certificate; the content of the aerodrome manual; and any other manuals for the aerodrome equipment available at the aerodrome, as applicable: Annex III, ADR.OR.C.005, paragraph 1(a);
  - 11.4.2 it is also responsible for ensuring the provision of air navigation services appropriate to the level of traffic and operating conditions at the airport and the design and maintenance of flight procedures: Annex III, ADR.OR.C.005, paragraph 1(b);
  - 11.4.3 if an unsafe condition develops at the aerodrome, the aerodrome operator is required, under the 2014 Regulations, to, without undue delay, take all necessary measures to ensure that those parts of the aerodrome found to endanger safety are not used by aircraft: Annex III, ADR.OR.C.005, paragraph 1(c);
  - 11.4.4 it must have procedures to prevent fires from occurring: Annex III, ADR.OR.C.040, paragraph 1(a);
  - 11.4.5 it must provide the services under Subpart B of in Annex IV directly or indirectly which include: emergency planning; rescue and firefighting services; assessing runway conditions; verification that those storing and dispensing of fuel to aircraft have procedures to ensure that aircraft are provided with uncontaminated fuel and of the correct specification;
  - 11.4.6 under ADR.OPS.B.075(a), one of the services the Claimant is required to provide is monitoring the airport and its surroundings:
  - 11.4.7 obstacle limitation and protection surfaces as established in accordance with the certification basis, and other surfaces and areas associated with the aerodrome,

in order to take, within its competence, appropriate action to mitigate the risks associated with the penetration of those surfaces and areas;

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

are specified in the direction are carried out by constables or by other persons of a description specified in the direction: section 13(1).

12. Airport operators may make byelaws pursuant to s 63 of the Airports Act 1986. The byelaws may include (but are not limited) to the following byelaws:
  - 12.1 for securing the safety of aircraft, vehicles and persons using the airport and preventing danger to the public arising from the use and operation of the airport;
  - 12.2 for controlling the operation of aircraft within, or directly above, the airport for the purpose of limiting or mitigating the effect of noise, vibration and atmospheric pollution caused by aircraft using the airport;
  - 12.3 for preventing obstruction within the airport;
  - 12.4 for prohibiting or restricting access to any part of the airport;
  - 12.5 for preserving order within the airport and preventing damage to property within it;
  - 12.6 for requiring any person, if so requested by a constable or airport official, to leave the airport or any particular part of it, or to state his name and address and the purpose of his being within the airport; and
  - 12.7 for restricting the area which is to be taken as constituting the airport for the purposes of the byelaws.

### Byelaws

13. Pursuant to section 63 of the Airports Act 1986, the Claimant made the Gatwick Airport – London Byelaws 1996 **[NH2-NH17]**. These apply within "*Gatwick Airport – London*" and "*the Airport*" is defined, by 1(1), as "*the aerodrome known as Gatwick Airport – London*". The plan marked "Plan 1" attached to the Particulars of Claim shows edged yellow the boundary to the operational limits of what is known as Gatwick Airport – London. Byelaw 3(17) provides:

HB-57 - HB-72

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

14. Byelaw 3(18) provides:

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

15. Byelaw 3(19) provides:

*No person shall intentionally obstruct or interfere with the proper use of the Airport or with any person acting in the execution of his duty in relation to the operation of the Airport.*

16. Byelaw 4(11) provides:

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

17. Either Gatwick officials (employees) or Sussex and Surrey Airport Police force support the byelaw enforcement. There are daily joint briefs with airport duty teams and control authorities to agree operational delivery on the day. Any breach of public order laws or airport byelaws are addressed by the operational teams and police. The Claimant can also utilise "Request to Quit" (RTQs) instructions, which are valid for 24 hours, for minor infringements. More serious misbehaviour can be met with a "prohibition notice" that effectively prohibits the individual from returning to the airport (apart from if they possess a valid travel ticket, i.e. are a bona fide passenger).

18. Gatwick Airport Limited is not a prosecuting authority, and has never brought a private prosecution so far as I am aware, for the purposes of enforcing the byelaws. Prosecutions and handled by the police and Crown Prosecution Service.

### **Background on Just Stop Oil ("JSO")**

19. Just Stop Oil describes itself on its website as a "*nonviolent civil resistance group demanding the UK Government stop licencing all new oil, gas and coal projects*". The group's stated plan to take action involves three aspects: Truth, Community and Action. Under action they state that:

*This is how civil resistance works: applying nonviolent pressure until we force change to happen. It's how the Freedom Riders forced an end to segregated buses in 1961. It's how disabled people won accessible transport in the nineties. It's how we'll win and force this criminal government to act on the unfolding climate disaster by stopping new oil and gas. No-one's going to save us, we need to come together to do that for ourselves.*

20. Homepage of website exhibit <https://juststopoil.org/> [NH18].

HB-73

21. The group are well known for their large acts of civil disobedience and often make national headlines. This includes very recently at Parliament Square, Stonehenge and the World Snooker Championship [NH22-30].

HB-77 - HB-85

<https://news.sky.com/video/just-stop-oil-activists-paint-parliament-square-orange-in-latest-protest-13176147>

<https://www.theguardian.com/uk-news/article/2024/jun/19/stonehenge-sprayed-orange-powder-paint-just-stop-oil-activists>

<https://www.bbc.co.uk/news/articles/c1we0pzw8pwo>

22. Members of the group were also found guilty over conspiracy to disrupt the M25 **[NH31-32]**.

HB-86 - HB-87

<https://morningstaronline.co.uk/article/just-stop-oil-activists-found-guilty-over-m25-disruption-plans>

### JSO threat against airports

23. The first paragraph on the home page of the group's website states that in order to achieve their goals, "*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*". **[NH18]**

HB-73

24. 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 **[NH33]**.

HB-88

<https://www.dailymail.co.uk/news/article-13177841/Eco-mob-plot-ruin-summer-holidays-disrupt-flights.html>

25. At this meeting, a co-founder of Just Stop Oil was reported to have advocated:

25.1 Cutting through fences and gluing themselves to runway tarmac;

25.2 Cycling in circles on runways;

25.3 Climbing on to planes to prevent them from taking off;

25.4 Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.

26. An Evening Standard article from 21 April 2024 referred to another meeting (also attended by an undercover journalist) and which included the following text **[NH42]**:

HB-97

"...

*Just Stop Oil's Phoebe Plummer reportedly warned of 'disruption on a scale that has never been seen before' at a meeting attended by an undercover journalist. The group has been critical of the airline industry over its carbon footprint.*



*She said: 'The most exciting part of this plan is that [it's] going to be part of an international effort. Flights operate on such a tight schedule to control air traffic that with action being caused in cities all around the world we're talking about radical, unignorable disruption.'*

*She added: 'It's time to wake up and get real – no summer holiday is more important than food security, housing and the lives of your loved ones. Flying is also a symbol of the gross wealth inequality that's plaguing our society and if we want to create change we need to adopt a more radical demand.'*

*Just Stop Oil is planning an alliance with Europe-based A22 Network to cause disruption at major international airports."*

27. 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?*

28. 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?*

29. 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> **[NH48]**, which says the following:

HB-103

***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.*

...

30. At 16 July 2024, £24,300 had been raised on this website.
31. I am aware from evidence filed in support of injunctions sought by Manchester airport, Stansted airport and East Midlands airport (case number KB-2024-02132) that, on 6 June 2024, Just Stop Oil sent an email to subscribers in the following terms:

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

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

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

***We won't be taking action alone.***

*Resistance groups across several countries in Europe have agreed to work together. That means **this summer's actions will be internationally coordinated.***

**PICTURE OF AIRPORT ACTIONS SYMBOLISING INTERNATIONAL COMMUNITY**

***(<https://us02web.zoom.us/join/zoom/register/tZloduqpgTMtE9dgMMhlaymvEZgO45jqJ19A>)***

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

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

*Want to meet the people making this happen?*

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

*You don't want to miss this.*

*See you there,  
Just Stop Oil"*

32. On 27 June 2024, the Metropolitan Police publicised the arrests of 27 Just Stop Oil supporters planning to disrupt airports across England, including some that the police believed to be "key organisers" for Just Stop Oil [NH52].

HB-107

<https://www.bbc.co.uk/news/articles/ce98dqn19plo>

33. Again, I am aware from the evidence filed in support of the injunctions referred to in paragraph 32 above that, 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..."*

34. I understand from the media links below that at least 27 members of JSO have been arrested under the Public Order Act on suspicion of conspiring to disrupt airports this summer. Chief Superintendent Ian Howells is quoted (from 28 June 2024) as saying that "We know Just Stop Oil are planning to disrupt airports across the country this summer which is why we have taken swift and robust action now" [NH54-61].

HB-109 - HB-116

<https://news.met.police.uk/news/arrests-made-as-just-stop-oil-plan-summer-disruption-485788>

<https://www.theguardian.com/uk-news/article/2024/jun/28/just-stop-oil-activists-arrested-suspicion-planning-disrupt-airports>

<https://juststopoil.org/2024/06/28/we-refuse-to-die-for-fossil-fuels-just-stop-oil-response-to-police-raids-resulting-in-at-least-13-arrests/>

35. Given the stated intent of the group, and the arrests that have been made on suspicion of conspiracy to disrupt airports, the threat that Just Stop Oil, Extinction Rebellion and other environmental protesters have to airports is real and urgent.

#### Previous protest incidents at UK and International Airports

36. In May 2024, Munich Airport was closed for two hours after six climate protesters (from climate protest group Last Generation) glued themselves to the runway **[NH62]**. This caused around 60 flight cancellations and 11 flight diversions.

HB-117

<https://news.sky.com/story/munich-airport-forced-to-close-for-two-hours-after-climate-protesters-glue-themselves-to-runway-13138243>

37. On 2 June 2024, Extinction Rebellion environmental activists blocked access to Farnborough Airport **[NH65]**.

HB-120

<https://extinctionrebellion.uk/2024/06/02/climate-activists-blockade-farnborough-private-jet-airports-three-main-gates/>

38. On 20 June 2024, two Just Stop Oil activists were arrested at London Stansted Airport after they used an angle grinder to cut a hole in the perimeter fence and used a fire extinguisher to spray two aircraft with orange paint. Seventy-five flights were disrupted during a 38 minute delay, which affected thousands of passengers. The activists appear to have filmed themselves and the footage is available on X:

[https://x.com/JustStop\\_Oil/status/1803656272777998529](https://x.com/JustStop_Oil/status/1803656272777998529)

39. Both activists were arrested and are currently on remand awaiting trial for criminal damage, aggravated trespass and interference with the use or operation of national infrastructure **[NH69]**.

HB-124

<https://www.bbc.co.uk/news/articles/ck55kedn98jo>

40. An article about the incident in the *Mail Online* quoted a source who said "*...the stunt at Stansted was only a prelude to disrupt even more airports over the coming months.*" **[NH71]**

HB-126

<https://www.dailymail.co.uk/news/article-13556023/just-stop-oil-disrupt-airports-sustained-period-action-stansted-stonehenge.html>

41. On 25 June 2024, four Just Stop Oil protesters were arrested at London Gatwick Airport railway station as they arrived. The individuals were found with suitcases containing a large number of bandages. The working assumption from the police is that they either intended

to block toilets causing flooding damage or once airside to throw bandages into aircraft engines or somehow disrupt the runway itself.

42. Four of the people whose arrests were publicised by the Metropolitan Police on 27 June 2024 were those at London Gatwick Airport referred to in the previous paragraph [NH69].

HB-124

<https://www.bbc.co.uk/news/articles/ce98dqn19plo>

43. On 15 July 2024, I received an email from the Metropolitan Police, which stated that Just Stop Oil protests were likely at various locations nationwide on Saturday 27 July 2024 [NH92]. The email stated that the police considered that potential protests at London City Airport had been deterred by the existence of an injunction at that airport (*"I have been informed that the protest was originally due to take place at London City Airport, but the obtaining of an injunction at that location has led to the change of a protest location, to a site with no injunction. It appears that the protesters may have a reduced attitude for risk if the site has an injunction"*).

HB-147

44. On 16 July 2024, Just Stop Oil wrote an open letter to the Prime Minister Sir Kier Starmer [NH77]:

HB-132

<https://juststopoil.org/2024/07/16/just-stop-oil-letter-to-prime-minister-starmer/#:~:text=We%20last%20wrote%20to%20you,by%202030%20as%20well%20as>

*Just Stop Oil Letter to Prime Minister Starmer*

*Dear Prime Minister,*

*We write to congratulate you on becoming Prime Minister and to acknowledge that one of the first steps of your new government has been to reaffirm your commitment to end new UK oil and gas licensing. This is an essential first step towards what is required to end the UK's contribution to the climate crisis. However, we all know that it is not enough.*

*We also need to rapidly phase out our existing oil and gas projects and to end the use of fossil fuels across our economy. This is not only the view of Just Stop Oil; the call for a rapid phase out of fossil fuels is backed by climate science, by global equity considerations, by international law and by global public opinion.*

*We last wrote to you in your role as leader of the Labour Party on 24 June to demand that, should you become our next Prime Minister, you immediately commit the UK government to working with other nations to establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fair and just transition.*

*We indicated that unless such assurances were provided by 12 July, we would be forced to take action to protect our communities by engaging in a campaign of noncooperation against fossil fuel use, at airports across the country.*

*We are writing now to let you know that since no such assurances have been received we remain in civil resistance and are preparing to take action, but that, as ever, we remain open to dialogue.*

*The era of fossil fuels is over. It's time to stop waging war on humanity.*

*Yours sincerely,*

*Just Stop Oil.*

#### **Risks caused by disruption of Gatwick Airport**

45. The Claimant is responsible for the safety and security of all who use London Gatwick Airport and the operation of scheduled flights. Following the attempted action on 25 June 2024, the stated intentions of Just Stop Oil and other such groups and the intelligence received from the police on 15 July 2024 that further protests are likely and imminent, the Claimant wishes to take all necessary steps to avoid the risks of harm or damage caused by future and threatened protests.
46. Protest activity at London Gatwick Airport is likely to have significant and serious consequences:
  - 46.1 If any protesters were to access or affix themselves to, or throw objects on, the runways or taxiways of the airfield, any moving aircraft would have to be halted until the areas were clear and aircraft could not safely arrive or depart until all unauthorised persons and any object (such as the bandages found in the suitcases of the four protesters who were arrested at London Gatwick on 25 June) were removed.
  - 46.2 Immediate flights would therefore be delayed, and incoming flights diverted, which can have a large effect on later arrival/departure slots and have a knock on impact on surrounding airports. It can also have an effect on aircrew, who are restricted in the hours they can work, meaning that aircraft cannot be staffed or may be in the wrong location if

aircraft have to be diverted. Passengers and cargo would then be subject to delays and/or cancellations.

46.3 There are also serious health and safety implications of unauthorised persons accessing the airside areas of the Airport to carry out any forms of protest:

46.3.1 Aircraft jet engines are extremely hazardous; if people get too close to them, they can be sucked in and catastrophically injured or killed.

46.3.2 Highly flammable aviation fuel is stored and transported on the airport aprons and presents a risk of fire or contamination.

46.3.3 Moving aircraft pose a danger to anyone on the ground.

46.3.4 There are numerous moving vehicles on the taxiways and aprons, which are not conventional road vehicles, and their drivers would not expect unauthorised persons on the airport.

46.3.5 Armed security services patrol the airports to counter potential terrorist activity. Any activity outside the usual operation of the airport could be viewed by security as a potential threat and/or would distract them from their duties, heightening any terrorist risk. There is also, always, the possibility that any protest does turn violent or is used as a cover for terrorist activity.

46.3.6 Emergency services and our own rescue and fire-fighting team may have to put themselves at risk in order to remove and / or rescue protestors who climb on top of buildings and/or aircraft. During a protest at London City Airport in October 2019, direct action organised by Extinction Rebellion involved individuals climbing on top of the glass roof of the Main Terminal building; and individual climbing on (and gluing himself to) the top of an aircraft. The risks associated with falling from height include catastrophic injury and death **[NH80]**.

HB-135

<https://news.sky.com/story/flight-returns-to-london-city-airport-terminal-as-climate-change-protester-is-arrested-on-board-11832001#:~:text=Hundreds%20of%20people%20attempted%20to,to%20net%2Dzero%20by%202050.>

47. There is also a financial impact. One lost day of disruptive operations could cost between £3 million and £3.5 million. In addition, any damage to aircraft, by material being ingested into the aircraft (for example) could be very costly. While this was investigated, the aircraft would be grounded until it could either be fixed or another aircraft made available.

### **The need for an Injunction**

48. The Claimant is therefore concerned that there is a real risk that London Gatwick Airport will be targeted by direct action from climate protest groups this summer. London Gatwick is a critical piece of national infrastructure and any such action would generate serious disruption.
49. I am aware that similar injunctions have recently been granted against persons unknown at Manchester Airport, Stansted Airport, East Midlands Airport, London City Airport and London Heathrow Airport.
50. Gatwick Airport Limited has no wish to stifle protesters' rights to freedom of speech or freedom of assembly. For many years, it has worked with a number of protest groups who wish to conduct lawful and peaceful protests. Together with the airport policing teams, Gatwick Airport Limited has co-ordinated with those groups and allowed them on to the airport in pre-agreed locations, for pre-agreed times and activities. These have included groups such as XR, The Red Rebels and Cagne. The most recent protest was in the arrivals area of the South Terminal in May 2024. Gatwick Airport has not received any communication / contact from any protestors wishing to protest (and which it might not be able to accommodate, in any event, depending on the request) and it appears that the current direct action that is planned relies on an element of surprise. Other than the information provided by the Metropolitan Police, we do not know when or where the next incident may be.
51. The Claimant considers that unless an injunction is granted, there is a serious risk of disruption at London Gatwick Airport this summer. It is unlikely that a direct action group such as Just Stop Oil will make a public announcement of an intended protest in advance.
52. Damages would not be an adequate remedy given:
  - 52.1.1 The health and safety risk to the Claimant's passengers, the emergency services and the protesters themselves.
  - 52.1.2 The disruption to passengers from cancelled, delayed and diverted flights.
  - 52.1.3 The risk of financial loss that is unlikely to be recoverable from the Defendants, who are essentially individuals who could not meet damages of that magnitude, and in any event are of unknown identities.
53. The Claimant has considered whether there are any alternative ways of dealing with direct action at London Gatwick Airport. The Claimant has never prosecuted a breach of the Byelaws. It does not appear that the prospect of prosecution deters JSO given the arrests I have mentioned. I am also conscious that any prosecutions would have to occur after the

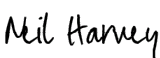


protest had occurred at the airport by which time the serious harm I have identified may have occurred.

**STATEMENT OF TRUTH**

I believe 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.

DocuSigned by:

  
4F2309857CFF4FB...

SIGNED: .....

**NEIL HARVEY**

18-Jul-2024 | 07:13:18 BST  
Date:.....

Claim No: [...]

**IN THE HIGH COURT OF JUSTICE**

**KING'S BENCH DIVISION**

B E T W E E N:-

**GATWICK AIRPORT LIMITED**

Claimant

-and-

**PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON GATWICK AIRPORT (AS SHOWN FOR IDENTIFICATION OUTLINED IN YELLOW AND SHADED YELLOW AND BLUE ON THE PLAN 1 ATTACHED TO THE PARTICULARS OF CLAIM**

Defendant

---

**EXHIBIT NH1**

---

This is Exhibit "NH1" referred to in the First Witness Statement of Neil Harvey dated 18 July 2024.

Date: 18 July 2024

YOUR LONDON AIRPORT  
*Gatwick*

# AIRPORT BYELAWS

---

---

## Contents

1.	Interpretation	P2
2.	Penalties	P3
3.	Prohibited acts	P3
4.	Acts for which permission is required	P5
5.	Prohibited acts on parts of the airport to which the road traffic enactments do not apply	P7
6.	Acts for which permission is required on parts of the airport to which the road traffic enactments do not apply	P8
7.	Other acts requiring lawful authority or reasonable cause or excuse	P8
8.	Tunnels	P8
9.	Taxis	P9
10.	General	P10
11.	Lost property	P11
12.	Revocation of lost property regulations	P13
13.	Revocation of Byelaws	P13

---

Site map Reviewed 23 August 2005

Original copies of this document may be obtained from the Gatwick Airport Limited CEO's office, or the Legal Department of Gatwick Airport Limited

The Gatwick Airport - London Byelaws 1996

Gatwick Airport Limited, in exercise of the powers conferred on it by sections 63 and 64 of the Airports Act 1986 and section 37 of the Criminal Justice Act 1982, and of all other powers enabling it in that behalf, hereby makes the following byelaws which shall apply within Gatwick Airport – London:-

---

# 1. Interpretation

## 1(1) In these byelaws:-

"Accident" means an unintended occurrence which has an adverse physical result;

"Aircraft" means a heavier than air power driven flying machine and includes aeroplane (land plane) aeroplane (seaplane) aeroplane (amphibian) aeroplane (self-launching motor glider) powered lift (tilt rotor) rotorcraft (helicopter and gyroplane);

"the Airport" means the aerodrome known as Gatwick Airport – London;

"the Airport Company" means Gatwick Airport Limited, and where the context so requires references in these byelaws to the Airport Company shall include a reference to any person engaged (whether by employment or otherwise) by the Airport Company;

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

"Animal" means any animal wild or domesticated that is brought onto the Airport except in byelaw 10(2) where it has the same meaning as in section 170 (8) of the Road Traffic Act 1988;

"Authorised Standing" means that part of the Airport indicated by the Sign "authorised standing for taxis" or a place which has been designated for use by a Taxi by the Airport Company;

"Competence to Drive" means written authority issued to a person by his current employers which authorises that person to drive and operate a particular class of Vehicle;

"Constable" includes any person having the powers and privileges of a constable;

"Customs and Excise Acts" shall have the same meaning as in the Customs and Excise Management Act 1979;

"Lost Property Office" means any building or part of a building at the Airport which has been designated by the Airport Company and includes Airport Information Desks;

"Portable Music Machine" means a portable radio, cassette player, compact disc player, television or computer games machine;

"Private Hire Vehicle" means a private hire vehicle licensed under section 48 of the Local Government (Miscellaneous Provisions) Act 1976;

"Restricted Access" means that access is only available to specific persons who, having satisfied pre-conditions set by the Airport Company, are permitted to have such access by the Airport Company;

"Restricted Area" means any part or parts of the Airport to which there is Restricted Access;

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

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

"Taxi Feeder Park" means that part of the Airport indicated by the Sign "Taxi Feeder Park";

"Terminal Building" means that building or buildings at the Airport used as terminals for passengers arriving at or departing from the Airport;

"Ticket" means a ticket, token, plastic card or electronic device;

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

**1(2)** These byelaws may be cited as The Gatwick Airport – London Byelaws, 1996.

**1(3)** No provision in these byelaws shall apply to any member of a fire, police or ambulance service when he is acting in the course of duty, or to any emergency vehicle being used by such person.

## 2. Penalties

Any person contravening any of the following byelaws shall be liable on summary conviction to a fine which, in respect of a contravention of:-

**2(1)** Byelaws 3(6)(a) and 4(17) shall not exceed level 2 on the standard scale\*

**2(2)** Byelaws 3(4), 3(6)(b), 3(7), 3(8), 4(1), 4(2), 4(4), 4(12), 5(1)(a), 5(1)(b), 5(1)(c), 5(7), 5(9), 6(2) and 7(1) shall not exceed level 4 on the standard scale.

**2(3)** Any other byelaw shall not exceed level 3 on the standard scale.

## 3. Prohibited acts

### 3(1) Aircraft parking

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

### 3(2) Securing aircraft

No person shall fail to secure against movement any stationary Aircraft which is not in a hangar.

### 3(3) Emergency stop switch etc

Except in the case of an emergency, no person shall intentionally operate any switch or lever of any escalator, travolator, tracked transit

system, lift or any other automatic conveyance for passengers upon or near to which a Sign is displayed which states that it is only intended to be operated in case of emergency.

### 3(4) Misuse of telephones

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

### 3(5) Tampering with equipment

Without reasonable excuse, no person shall tamper with or misuse any apparatus used for or in connection with the control of access of persons or Vehicles to any part of the Airport.

### 3(6) No smoking

No person shall smoke or bring a naked light into or light any naked light in:-

- (a) any place where any such act is prohibited by a Sign; or
- (b) any part of a Restricted Area in the open air.

### 3(7) Radio interference

No person shall operate or use any radio transmitter or other thing capable of radiating electrical interference in such a way as to adversely affect or be likely to adversely affect the operation of any communications or navigation systems at the Airport.

---

\* As at the date of these byelaws the relevant levels on the standard scale are by virtue of section 37(2) of the Criminal Justice Act 1982, as follows:-

Level 2 £500

Level 3 £1000

Level 4 £2500

but these are subject to amendment from time to time by statute or by an order under section 143 of the Magistrates’ Court Act 1980.

---

### **3(8) False alarms**

No person shall knowingly by any means give a false bomb warning or a false fire, ambulance, or other emergency alarm.

### **3(9) Unattended baggage**

No person shall leave any baggage or other item unattended in a public place or Restricted Area within the Airport.

### **3(10) Allow anything on airport where forbidden**

No person shall allow any Vehicle, Animal or thing to be on the Airport after its presence on the Airport has been forbidden by a Constable or an Airport Official and no Constable or Airport Official shall forbid the presence of any Vehicle, Animal or thing unless he has reasonable grounds to believe that its presence has been responsible for or is about to be responsible for a breach of a byelaw or for a criminal offence.

### **3(11) Not to return for 24 hours**

No person, shall allow any Vehicle, Animal or thing to be on the Airport after having been required by a Constable or an Airport Official to remove it and no person after having complied with this requirement shall allow that Vehicle, Animal or thing to reenter the Airport for a period of twenty-four hours thereafter.

### **3(12) Persons required to leave**

No person shall remain on the Airport after having been requested by a Constable or an Airport Official to leave and no Constable or Airport Official shall request a person to leave unless he has reasonable grounds to believe that that person has committed or is about to commit a breach of a byelaw or a criminal offence.

### **3(13) Persons not to return for 24 hours**

No person, having left the Airport, at the request of a Constable or Airport Official, shall re-enter the Airport, for a period of twenty-four hours thereafter except as a bona fide airline passenger.

### **3(14) Prohibited persons**

No person shall enter the Airport, except as a bona fide airline passenger, whilst having been prohibited in writing from entering by the Airport Company.

### **3(15) Persons to keep animals under control**

No person shall fail to keep any Animal under control or permit any Animal to foul any footpath or building, provided that in proceedings for an offence against this byelaw it shall be a defence for the person charged to prove that he took all reasonable precautions and exercised all due diligence to avoid the commission of the offence.

### **3(16) Drunk etc in restricted area**

No person shall be drunk or under the influence of drugs or other intoxicating substances in a Restricted Area.

### **3(17) No demonstrations etc**

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

### **3(18) No display of flags or banners etc**

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

### **3(19) Obstruction**

No person shall intentionally obstruct or interfere with the proper use of the Airport or with any person acting in the execution of his duty in relation to the operation of the Airport.

### **3(20) Uncovered refuse containers**

No person shall leave uncovered refuse containers in a Restricted Area.



---

### 3(21) Litter etc

No person shall drop or otherwise deposit anything in such circumstances as to cause, contribute to, or tend to lead to, the defacement by litter pollution or waste substances of any part of the Airport.

### 3(22) Not to remove baggage trolleys

No person shall remove from the Airport any baggage trolley provided for passenger use by the Airport Company.

### 3(23) Misuse of baggage trolleys

No person shall misuse any baggage trolley provided for passenger use by the Airport Company.

### 3(24) Loiter etc

No person shall loiter, frequent or remain on the Airport without reasonable cause.

### 3(25) Emergency exits

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

### 3(26) Evacuation

Without reasonable excuse, no person shall in an emergency fail to evacuate or remain in any building on the Airport when instructed to do so by a Constable, an Airport Official or the Airport Company.

### 3(27) Private hire vehicles

No person shall cause or permit a Private Hire Vehicle except a Private Hire Vehicle authorised by the Airport Company to enter the Airport for the purpose of loading passengers provided that it shall not be an offence for a pre-booked Private Hire Vehicle to load passengers at a public car park or at a distance of more than half a mile from the Terminal Building or, with the consent of a Constable, traffic warden in uniform or Airport Official, at any distance from the Terminal Building.

### 3(28) Fail to comply with signs etc

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

## 4. Acts for which permission is required

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

### 4(1) Aircraft engine running

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

### 4(2) Cleaning etc of aircraft and vehicles

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

### 4(3) Fires

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

### 4(4) Filling or discharging liquid fuel

No person shall fill or discharge from any container, including any part of a Vehicle, liquid fuel elsewhere than in a place approved for the purpose by the Airport Company.

### 4(5) Prohibition notice

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

---

#### **4(6) Climbing etc**

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

#### **4(7) Not to cause annoyance**

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

#### **4(8) Apparatus etc**

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

#### **4(9) Animal grazing**

No person shall graze Animals.

#### **4(10) Restricted area fence**

No person shall place any building, structure, equipment, Vehicle or container or any other item within three metres of any fence forming the boundary of a Restricted Area.

#### **4(11) Entering or leaving the airport**

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

#### **4(12) Offer of service**

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

#### **4(13) Taxi touting**

No person shall in the Terminal Building or other public building, car parks or any other public place on the Airport offer his or any other Vehicle for hire.

#### **4(14) Display signs**

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

#### **4(15) Begging**

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

#### **4(16) Gaming**

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

#### **4(17) Wearing of passes**

No person, other than a bona fide airline passenger, while in a Restricted Area shall fail to wear a pass issued to him by or on behalf of the Airport Company so that it is reasonably visible at all times.

## 5. Prohibited acts on parts of the airport to which the road traffic enactments do not apply

The following acts are prohibited on any part of the Airport to which the road traffic enactments do not apply:-

### 5(1) Driving offences

No person shall drive a Vehicle:-

- (a) dangerously\*
- (b) without due care and attention, or without reasonable consideration for other persons using that part of the Airport;
- (c) whilst drunk or under the influence of drink or drugs or other intoxicating substance; or
- (d) without prejudice to any Sign from the Managing Director of the Airport from time to time, at a speed in excess of 20 miles per hour on the Airport's apron or roads or in excess of such other speed limit indicated by a Sign erected in a conspicuous or appropriate position or by a Sign which conforms to the Traffic Signs Regulations and General Directions 1994\*\*, which speed shall not in any event be more than 40 miles per hour except in an emergency.

### 5(2) Not to cause danger with a vehicle

No person shall use, cause or permit to be used, any Vehicle in such a way as to cause or to be likely to cause, danger or nuisance to any person.

### 5(3) Obstruction

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

### 5(4) Obstruction causing danger

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

### 5(5) Fail to set handbrake etc

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

### 5(6) Use of vehicles

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

### 5(7) Fuel and exhaust systems

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

### 5(8) Passenger safety and insecure load

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

- (a) any Vehicle unless such Vehicle and all parts and accessories of such Vehicle are at all times in such condition, and the number of passengers carried by such Vehicle, the manner in which any passengers are carried in or on such Vehicle, and the weight, distribution, packing and adjustment of the load of such Vehicle are such that no danger is caused or is likely to be caused to any person in or on such Vehicle or on the Airport; or

---

\* For the purposes of this byelaw "dangerously" has the same meaning as in section 2A of the Road Traffic Act 1988

\*\* (S1 1994/1519)

- (b) any Vehicle unless the load carried by such Vehicle is at all times so secured, if necessary by physical restraint other than its own weight, and is in such a position that neither danger nor nuisance is caused or is likely to be caused to any person or property by reason of the load or any part thereof falling or being blown from such Vehicle, or by reason of any other movement of the load or any part thereof in relation to such Vehicle.

#### **5(9) Permitted areas for vehicles**

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

## **6. Acts for which permission is required on parts of the airport to which the road traffic enactments do not apply**

The following acts are prohibited on any part of the Airport to which the road traffic enactments do not apply unless the permission of the Airport Company has first been obtained or unless the act is performed by a person acting with lawful authority or excuse:-

#### **6(1) Drive or place vehicle**

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

#### **6(2) Lights on vehicles**

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

#### **6(3) Parking**

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

#### **6(4) Unattended vehicles**

No person shall:-

- (a) leave any Vehicle unattended when its engine is running; or
- (b) leave any Vehicle with a removable ignition key unattended when the ignition key is in the Vehicle.

## **7. Other acts requiring lawful authority or reasonable cause or excuse**

#### **7(1) Tampering with aircraft**

No person shall tamper with any Aircraft or anything used in connection with any Aircraft without lawful authority or reasonable cause or excuse.

#### **7(2) Tampering with lift etc**

No person shall tamper with or misuse any lift, escalator, travolator, tracked transit system, conveyor belt, air jetty, or any mechanical or electrical or electronic apparatus without lawful authority or reasonable cause or excuse.

#### **7(3) Entering vehicles etc**

No person shall enter or get on any Vehicle, truck, trolley or aircraft steps or tamper with the brake or other part of its mechanism without lawful authority or reasonable cause or excuse.

## **8. Tunnels**

#### **8(1) Use of carriageway**

In tunnels on the Airport no person shall use:-

- (a) the carriageway, other than with a motor Vehicle;

- (b) the cycle track, other than while pushing or riding a pedal cycle; or
- (c) the footpath other than on foot.

### **8(2) Sufficient fuel**

No person shall drive a Vehicle into a tunnel unless the Vehicle has sufficient fuel or other power to propel it through the tunnel and clear of the access roads to the tunnel.

### **8(3) Animals**

No person shall take into any tunnel any Animal unless such Animal is conveyed in a motor Vehicle or is carried on the footpath in a basket or other container or, being a dog, is on a lead or chain.

### **8(4) Entry to tunnel**

No person shall enter any tunnel after having been directed by a Constable or Airport Official not to enter any tunnel.

### **8(5) Repairs etc in tunnel**

No person shall change a tyre or wheel of a Vehicle, or carry out repairs to, or re-fuel a Vehicle in any tunnel except by or under the direction of a Constable or Airport Official and no person shall remove a Vehicle which has broken down from the tunnel except under the direction of a Constable or Airport Official.

## **9. Taxis**

### **9(1) Ply for hire**

No person shall cause or permit a Taxi to ply for hire or load passengers unless:-

- (a) he is authorised to do so by the Airport Company; and
- (b) he does so from an Authorised Standing provided that it shall not be an offence to load passengers in a public car park or at a distance of more than half a mile from the nearest of such Authorised Standings or, with the consent of a Constable, traffic warden in uniform, or an Airport Official, at any distance from such Authorised Standings.

### **9(2) Authorised standing**

No person shall knowingly cause or permit any Vehicle other than a Taxi to stand on an Authorised Standing.

### **9(3) Taxi feeder park**

No person shall drive a Taxi on to an Authorised Standing without having first driven through a Taxi Feeder Park unless at the direction or with the consent of a Constable, a traffic warden in uniform, an Airport Official or the Airport Company.

### **9(4) Permitted number standing**

No person shall cause or permit a Taxi to stand on an Authorised Standing in excess of the maximum permitted number of Taxis as indicated by a Sign at the head of the Authorised Standing.

### **9(5) Taxi drivers**

Taxi drivers on an Authorised Standing shall be with their Taxis and be available and willing to be hired immediately.

### **9(6) Taxi feeder park, parking**

No person shall without the permission of the Airport Company leave a Taxi on a Taxi Feeder Park unless willing to be despatched immediately to an Authorised Standing.

### **9(7) Filling vacancies**

Drivers shall move up their Taxis on an Authorised Standing or Taxi Feeder park by filling vacancies as they occur.

### **9(8) Disabled taxis**

Disabled Taxis shall not be left by their drivers on an Authorised Standing or Taxi Feeder Park longer than is reasonably necessary to effect removal unless such disablement is temporary and is remedied without delay.

---

### 9(9) Obstruction

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

### 9(10) Washing down

No person shall wash down or clean out a Taxi on an Authorised Standing.

### 9(11) Taxi feeder park, good order

Taxi drivers who are for the time being in a Taxi Feeder Park shall comply with such directions for ensuring good order and an orderly movement of traffic within that Taxi Feeder Park as may be given by a Constable, a traffic warden in uniform, an Airport Official or the Airport Company.

### 9(12) Tickets

No person shall bring a Taxi into the Taxi Feeder Park at the Airport unless he has been permitted to do so by the Airport Company and has accepted a Ticket issued by or on behalf of the Airport Company.

### 9(13) Leaving taxi feeder park

Taxi drivers who are for the time being in a Taxi Feeder Park shall:-

- (a) leave the Taxi Feeder Park by an exit for the time being designated for that purpose and in the order in which they entered immediately they are required to do so by a Constable, traffic warden in uniform or an Airport Official; and
- (b) proceed directly and without delay to the Authorised Standing designated on the Ticket issued to the Taxi driver by or on behalf of the Airport Company;

provided that nothing in this byelaw shall apply to anything to the contrary done at the direction of, or with the consent of a Constable, traffic warden in uniform, the Airport Company or an Airport Official.

### 9(14) Ticket endorsement

Taxi drivers shall on arrival at the Authorised Standing designated on the Ticket issued to the Taxi driver by or on behalf of the Airport Company offer the Ticket for endorsement in a manner prescribed by the Airport Company to a Constable, traffic warden in uniform, the Airport Company or an Airport Official when requested to do so.

### 9(15) Transfers to authorised standings

Taxi drivers shall not subsequently transfer their Taxis to any other Authorised Standing unless the consent of a Constable or traffic warden in uniform, the Airport Company or an Airport Official has first been obtained.

### 9(16) No more than one taxi

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

### 9(17) Defacing tickets

No person shall deface, alter or amend any Ticket issued for the purpose referred to in byelaw 9(12).

## 10. General

### 10(1) State name and address

A person shall, if requested to do so by a Constable or Airport Official, state his correct name and address and the purpose of his being on the Airport.

### 10(2) Vehicle accident reporting

Where, on a part of the Airport to which the road traffic enactments do not apply any accident involving a Vehicle occurs by which:-

- (a) personal injury is caused to a person other than the driver of that Vehicle; or
- (b) damage is caused:-
  - (i) to a Vehicle other than that Vehicle;

- (ii) to an Animal other than an Animal in or on that Vehicle; or
- (iii) to any other property constructed on, fixed to, growing in or otherwise forming part of the land on which the road in question is situated or land adjacent to such land

that driver shall stop and give his name and address, the name and address of the owner of the Vehicle, the registration number or identification marks of the Vehicle and details of the accident to a Constable through the published Airport telephone number, as soon as reasonably practicable.

### 10(3) Aircraft accident reporting

Where, on part of the Airport to which the road traffic enactments do not apply any accident involving an Aircraft occurs:-

- (a) if present at the time of the accident, the aircraft commander (or if the Aircraft is being towed, the tug-driver) shall stop and give:-
  - (i) his name and address;
  - (ii) the name and address of the person who is the operator of the Aircraft at the time of the accident;
  - (iii) the identification marks of the Aircraft; and
  - (iv) details of the accident

to a Constable through the published Airport telephone number as soon as reasonably practicable.

- (b) the driver of any Vehicle involved shall stop and give:-
  - (i) his name and address;
  - (ii) the name and address of the owner of the Vehicle;
  - (iii) the registration number or identification marks of the Vehicle; and
  - (iv) details of the accident

to a Constable through the published Airport telephone number as soon as reasonably practicable.

### 10(4) Production of insurance details etc

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

### 10(5) Information as to a driver of a vehicle

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

## 11. Lost property

### 11(1) Applications of byelaws

These byelaws shall apply in relation to the safe custody, redelivery and disposal of any property or thing which while not in proper custody, is found on any part of the Airport to which the public or passengers have access or in any Vehicle owned or operated by or on behalf of the Airport Company excluding any property or thing found on board an Aircraft, in a Taxi or on premises let by the Airport Company.

### 11(2) Person who finds property

Subject to the provisions of the Customs and Excise Acts, any person (other than a member of staff of the Airport or an Airport Official or a Constable) who finds property to which these byelaws apply shall hand it as soon as reasonably practicable in the state in which he finds it to a member of staff of the Airport, an Airport Official or a Constable and inform that person of the place and circumstances in which it was found.

### 11(3) Property to be delivered to lost property office

- (a) Subject to any provisions of the Customs and Excise Acts, and paragraph (b) below, any member of the Airport staff or an Airport Official or Constable to whom property is handed pursuant to byelaw 11(2) hereof or who himself finds any property to which these byelaws apply shall, as soon as reasonably practicable and in any case before leaving the Airport, deliver such property for safe custody in the state in which it comes into his possession to the Lost Property Office and inform a member of staff of the Airport or an Airport Official at the Lost Property Office of the circumstances in which it was found.
- (b) If before any lost property shall have been delivered for safe custody to the Lost Property Office under this byelaw, it is claimed by a person who satisfies the member of staff of the Airport or an Airport Official or Constable, as the case may be, that he is the true owner, it shall be returned to that person, forthwith, without fee, on giving his name and address to the member of staff of the Airport or an Airport Official or Constable who shall, as soon as possible, report the facts and give the claimant's name and address and a description of the lost property to the Lost Property Office.

### 11(4) Records of lost property

Any lost property delivered to the Lost Property Office shall be retained in safe custody by the Airport Company or an Airport Official until claimed by the true owner thereof or disposed of in accordance with these byelaws and the Airport Company or an Airport Official shall keep for a period of not less than 12 months a record showing particulars of the lost property (whether delivered to the Lost Property Office or disposed of pursuant to byelaw 11(3) hereof), the circumstances in which it was found and the ultimate disposal of the lost property provided that:-

- (a) official documents, including licences, passports and aliens identity books

shall wherever practicable be returned forthwith to the appropriate government department, local authority or other body or person responsible for issuing them or for controlling or dealing with them;

- (b) where the name and address of the true owner of any lost property other than the documents referred to in the preceding proviso, are readily ascertainable the Airport Company or an Airport Official shall

forthwith notify him that the lost property is in their possession and may be claimed in accordance with these byelaws.

### 11(5) Claim of property

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

### 11(6) Disposal of property

- (a) If any lost property retained by the Airport Company or an Airport Official for safe custody in accordance with these byelaws is not, within three months of the date when it was delivered to the Lost Property Office, re-delivered to a person pursuant to byelaw 11(5) hereof the Airport Company or an Airport Official shall be entitled to sell it for the best price that can reasonably be obtained or, in the case of items of negligible value, to dispose of it as they think fit.
- (b) Notwithstanding the foregoing provisions of these byelaws, if any lost property retained by the Airport Company or an Airport Official pursuant to these byelaws is of a perishable nature and if, within 48 hours from the time when it was found, it has not been re-delivered to a person pursuant to byelaw 11(5) hereof, the Airport



Company or an Airport Official shall be entitled to sell it at the best price that can reasonably be obtained.

- (c) Notwithstanding the foregoing provisions of these byelaws any lost property which is or which becomes objectionable may forthwith be destroyed or otherwise disposed of in a reasonable manner.
- (d) A sale under this byelaw shall not prejudice the right, for a period of 12 months from the date on which the property came into the custody of the Airport Company or an Airport Official, of any true owner whose rights have been divested by the sale to be paid the proportion due to him of the residue of the proceeds of sale after deduction of any charge by the Airport Company or an Airport Official for the safe custody of the lost property and the Airport Company or an Airport Official's reasonable costs.

#### 11(7) Power to open packages etc

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

- (a) identifying and tracing the owner of the lost property;
- (b) ascertaining the nature of the contents; or
- (c) satisfying the Airport Company or an Airport Official that the contents do not include any item or items which may put at risk the safety or security of the Airport, any Aircraft or any air navigation installation;

and if any item or items referred to in (c) above are found, they shall be handed to a Constable or Airport Official immediately.

## 12. Revocation of lost property regulations

The British Airports Authority (Lost Property) Regulations 1972 (S.I. 1972 No. 1027) are hereby revoked in relation to Gatwick Airport – London.

## 13. Revocation of Byelaws

The Gatwick Airport – London Byelaws 1983 are hereby revoked.

The COMMON SEAL  
of GATWICK AIRPORT  
LIMITED affixed  
is authenticated by:-

*Eric George Lomas*  
**Director**  
*Michael Stewart*  
*Hodgkinson*  
**Director**

The Secretary of State confirmed the above byelaws on the 30 October 1996 and they came into operation on the 16 December 1996 by virtue of schedule 3, paragraph 6 of the Airports Act 1986.

Copies may be obtained from Gatwick Airport Limited, CEO's Office, Destinations Place, Gatwick Airport, West Sussex RH6 ONP.





# WILL YOU BACK A FOSSIL FUEL TREATY?

**TAKE ACTION**

**COME TO A TALK**

 **DONATE TO SUPPORT ACTION**



## 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?**

We use cookies on our website to give you the most relevant experience by remembering your preferences and repeat visits. By clicking "Accept All", you consent to the use of ALL the cookies. However, you may visit "Cookie Settings" to provide a controlled consent.

[Cookie Settings](#)

[Accept All](#)



**"WHAT WE DO OVER THE NEXT THREE TO FOUR YEARS, I BELIEVE, IS GOING TO DETERMINE THE FUTURE OF HUMANITY."**

Sir David King, the former Chief Scientific Advisor to the UK Government, 2021



How people are taking on oil.

Taking Action

**THE PLAN.**



**TRUTH**

We are being lied to. We need to face up to the scale of the crisis that we are facing. Everything we know and love is threatened by the breakdown of our climate. Our economy, our homes our way of life. You, me, scientists, press, politicians, educators... everyone needs to face up to the reality of what is being done to us.

We use cookies on our website to give you the most relevant experience by remembering your preferences and repeat visits. By clicking "Accept All", you consent to the use of ALL the cookies. However, you may visit "Cookie Settings" to provide a controlled consent.

[Cookie Settings](#)

[Accept All](#)

Every one of us feels alone in this. But when we come together, then we can start to grapple with the challenge of our lifetimes. When we come together we are powerful, and we can create meaningful change and make history. We come to talks and events, we cook and eat together, we train in nonviolent action and when we are ready we join our local group and take action.



## ACTION

This is how civil resistance works: applying nonviolent pressure until we force change to happen. It's how the Freedom Riders forced an end to segregated buses in 1961. It's how disabled people won accessible transport in the nineties. It's how we'll win and force this criminal government to act on the unfolding climate disaster by stopping new oil and gas. No-one's going to save us, we need to come together to do that for ourselves.

I'M READY, SIGN ME UP!

We're part of an

## INTERNATIONAL NETWORK

ITALY

SWEDEN

SWITZERLAND

AUSTRALIA

FRANCE

GERMANY

AUSTRIA

NORWAY

NEW ZEALAND

UNITED STATES

SCOTLAND

CANADA

DENMARK



Follow us on social media.

## About us

**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.**

We use cookies on our website to give you the most relevant experience by remembering your preferences and repeat visits. By clicking "Accept All", you consent to the use of ALL the cookies. However, you may visit "Cookie Settings" to provide a controlled consent.

[Cookie Settings](#)

[Accept All](#)

Our governments must work together to establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fast, fair, and just transition.

This can be accomplished by endorsing the [Fossil Fuel Non-Proliferation Treaty Initiative](#) and seeking a negotiating mandate to establish the treaty.

[FAQs](#) | [The Campaign](#) | [Research](#)

## Contact us

Press enquiries: [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)

General enquiries: [info@juststopoil.org](mailto:info@juststopoil.org)

Donation enquiries: [juststopoilgiving@protonmail.com](mailto:juststopoilgiving@protonmail.com)

Volunteer enquiries: [jsovolunteers@gmail.com](mailto:jsovolunteers@gmail.com)

Book a speaker: [contact@juststopoil.org](mailto:contact@juststopoil.org)

## Stay in touch

### SIGN UP FOR OUR NEWSLETTER

ADD YOUR NAME

☒ Opt in to email updates from Just Stop Oil

REGION (TO ADD YOU TO THE CORRECT REGIONAL MAILING LIST) \*

ARE YOU A STUDENT? (IF YES, WE CAN ADD YOU TO OUR STUDENTS SPECIFIC EMAILING LIST)

☐ Yes

[Not in GB?](#)

**Sponsored by:** Just Stop Oil



We use cookies on our website to give you the most relevant experience by remembering your preferences and repeat visits. By clicking "Accept All", you consent to the use of ALL the cookies. However, you may visit "Cookie Settings" to provide a controlled consent.

[Cookie Settings](#)

[Accept All](#)

# Just Stop Oil activists paint Parliament Square orange in latest protest

...are were driving on the road...

🕒 Wednesday 10 July 2024 15:42, UK

[Just Stop Oil](#)


[Climate Change](#)



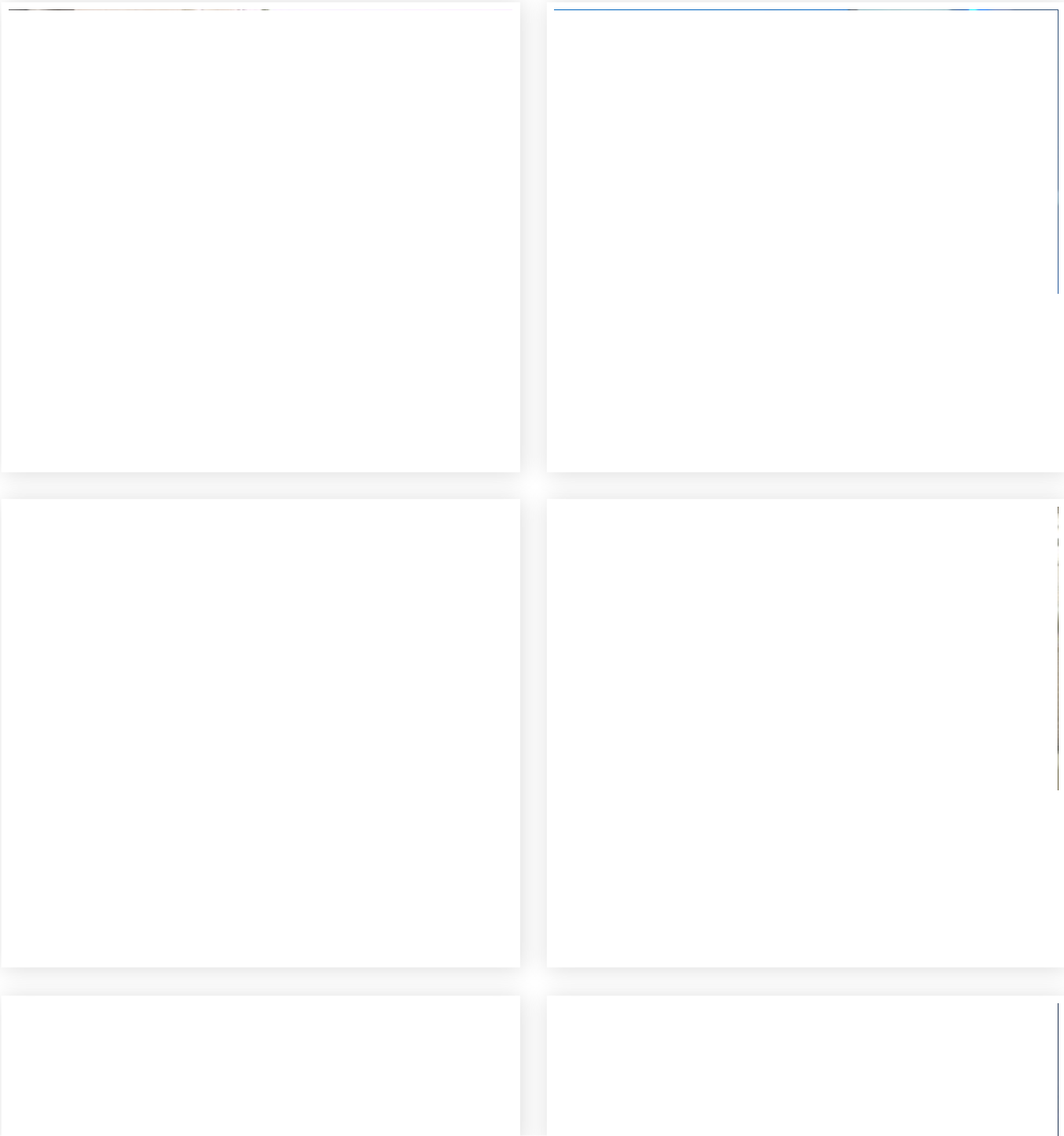
0:37

Just Stop Oil said it was to celebrate the government’s commitment to end all new licences for fossil fuel extraction



 Why you can trust Sky News >

WATCH NEXT







Activists spray Stonehenge with orange powder paint ahead of summer solstice - video

## UK news

# Stonehenge sprayed with orange powder paint by Just Stop Oil activists

Two people arrested, say police, while Rishi Sunak's comments on protest prompt response from Labour donor

**Steven Morris**

Wed 19 Jun 2024 17:51 BST

Two people have been arrested after Just Stop Oil activists sprayed orange powder paint over Stonehenge.

Rishi Sunak condemned the action, saying: "This is a disgraceful act of vandalism to one of the UK's and the world's oldest and most important monuments."

Dale Vince, the Labour donor and past backer of Just Stop Oil (JSO), responded to a comment by Sunak that a "certain Labour party donor" should condemn the action by saying: "Since Rishi Sunak has asked me personally to comment, I will. I don't support what JSO did today, it's that simple. But there are far worse actions we could focus on, far more harmful ones - like pushing two million children and their families into poverty."

The Labour leader, Keir Starmer, said the group was "pathetic". "Those responsible must face the full force of the law," he said.

Members of the public attempted to stop the spraying and a visitor managed to wrestle a spray can from one of the protesters.

Wiltshire police said: “We have arrested two people following an incident at Stonehenge this afternoon. At around noon, we responded to a report that orange paint had been sprayed on some of the stones by two suspects. Officers attended the scene and arrested two people on suspicion of damaging the ancient monument. Our inquiries are ongoing.”

The protest came as thousands of druids and revellers prepared to travel to the monument for the summer solstice.

Sean Moran, a guide, said: “It was devastating. I was very angry. We were having a great time and enjoying it when it happened. There’s living lichen on those stones. Biologists from around the world [come] to study it ... Did they think of that?”

A senior druid and pagan priest, King Arthur Pendragon, said he “totally” disapproved of the Just Stop Oil protest and that the group’s actions “alienate any sympathy” for their cause.

Pendragon, who is standing as an independent parliamentary candidate for the area, said: “Stonehenge is a living, working temple at times of celebration and pilgrimage such as the summer solstice and, as a well-known protester myself, I totally disapprove of such behaviour as demonstrated by these people, who do nothing to enhance and everything to alienate any sympathy anyone has or had for their cause.”

The priest has previously been involved in several protests at the monument and lost a legal challenge over a £15 car parking charge at the site in 2017, claiming the fee breached his human rights.

Paul Anderson, who was visiting the stones from Newcastle upon Tyne, said: “We were around the other side and we saw a lot of orange mist. I can’t see how that’s good publicity, doing something like that to an ancient monument. Coming from Newcastle, after the Sycamore Gap tree was felled, it beggars belief.”

His wife, Elaine Anderson, said: “It’s ruined the day, but not the holiday. I’m not going to let them. How dare you? It’s the last thing you’d expect.”

Mike and Julie, who did not wish to give their surnames and had come from the west coast of the US to visit Stonehenge, said it was a shame the path around the stones was closed after the incident. Mike said: “They are ruining it for people who have come from across the world to have their moment and see it.”

In a statement, JSO said it was time for “megalithic action” and called for the next UK government to agree a plan to stop the extraction and burning of oil, gas and coal by 2030.

It said: “Continuing to burn coal, oil and gas will result in the death of millions. We have to come together to defend humanity, or we risk everything. That’s why Just Stop Oil is demanding that our next government sign up to a legally binding treaty to phase out fossil fuels by 2030.”

---

---

---

---

Advertisement

---

## Most viewed

---

Advertisement

[Home](#) | [InDepth](#) | [Israel-Gaza war](#) | [Cost of Living](#) | [War in Ukraine](#) | [Climate](#) |[UK](#) | [World](#) | [Business](#) | [Politics](#)[England](#) | [Local News](#)[More](#)

# Just Stop Oil pair sentenced for snooker protest



PA MEDIA

A World Snooker Championship match between Robert Milkins and Joe Perry was disrupted at Sheffield's Crucible Theatre

## Oli Constable

BBC News

*Reporting from*

Sheffield Magistrates' Court

10 July 2024

**A Just Stop Oil protester who jumped onto a snooker table and covered it in orange powder during the World Snooker Championship has been given an 18-month community order.**

Edred Whittingham, 26, disrupted a match between Robert Milkins and Joe Perry at Sheffield's Crucible Theatre on 17 April 2023, with an international TV audience witnessing the protest.

On Wednesday at Sheffield Magistrates' Court, he was also told to pay £899 in compensation for damaging the table and asked to carry out 200 hours of unpaid work.

Whittingham, of Exeter, denied a criminal damage charge but was found guilty after a one-day trial in May.

Co-defendant Margaret Reid, 53, from Kendal, in Cumbria, was given a two-year community order and told to carry out 100 hours of unpaid work after being found guilty of attempting to cause criminal damage on another table.

Completion of the first-round match was delayed until the following day as a result of the protest, with Whittingham throwing dyed corn starch powder.

Reid's attempts to disrupt the match on the other table, on which Mark Allen and Fan Zhengyi were playing, were foiled when she was stopped by referee Olivier Marteel.

District Judge Daniel Curtis told the pair prison was "almost inevitable" if they continued their criminal activities.



| Margaret Reid and Edred Whittingham were convicted at Sheffield Magistrates' Court in May



Spectators were "robbed" of entertainment when the matches were stopped, World Snooker Tour chief executive officer Simon Brownell said in a victim impact statement read to court.

"They bought a ticket to our event and gave their best effort to destroy it, without a care in the world for the thousands of people who saved their money to attend," he said.

Security costs had increased by "hundreds of thousands of pounds" following the incident, he added.

In mitigation for Whittingham, the court heard the type of substance was selected "not to cause maximum damage but simply to have a visual effect as part of the protest".

Representing herself in court, Reid said: "I'm a pretty boring middle-aged person that, like a lot of people, tries to do their best - it would have been much easier to stay at home and pretend my little community was going to be fine."



| Whittingham and Reid were joined by Just Stop Oil activists at the court hearing

Sentencing the pair to community orders, Judge Curtis said some people "will be highly critical" of not sending them to prison, adding he had to apply the sentencing guidelines.

Outside court, Whittingham told the BBC he would continue protesting, adding: "We're facing a climate crisis.

"Prison time, community service, it's not going to deter us."

Whittingham was also told to carry out a 25-day rehabilitation order along with paying £390 in trial costs.

Reid was given a 10-day rehabilitation order, told to pay £390 trial costs and handed a £114 victim surcharge.

Follow BBC Yorkshire on [\*\*Facebook\*\*](#), [\*\*X \(formerly Twitter\)\*\*](#), and [\*\*Instagram\*\*](#). Send your story ideas to [\*\*yorkslincs.news@bbc.co.uk\*\*](mailto:yorkslincs.news@bbc.co.uk).

## Related Topics

[Sheffield](#)   [Kendal](#)   [Exeter](#)

## More on this story



**Just Stop Oil pair guilty over Crucible protest**

10 May

## Related links

[HM Courts & Tribunals Service](#)

## Top Stories

🕒 **LIVE** Jay Slater's mother says 'our hearts are broken' after death confirmed

🕒 **LIVE** [Gareth Southgate resigns as England manager after Euro 2024 loss](#)

🏆 Sport

In his own words: Southgate's journey as player and manager

🏆 Sport · 2 hours ago

## Features

THURSDAY, JULY 11, 2024

# Just Stop Oil activists found guilty over M25 disruption plans



Just Stop Oil activists outside the Southwark Crown Court, July 11, 2024

■ JUST STOP OIL (JSO) supporters convicted of causing public



until their sentencing hearing next Thursday and face lengthy prison sentences, despite the United Nations' condemnation of the trial.

The jury entered guilty verdicts against all defendants yesterday, ruling that the climate crisis was "irrelevant" to the trial.

In her closing statement, 22-year-old Ms Gethin said: "People are dying already, my generation is being cast into the dust.

"We are told this is a functioning democracy, but that direct actions like this are not justified.

"It is in that democracy that no-one has been held responsible for the billions of pounds wasted on PPE, for the lives lost in Grenfell Tower, for the Post Office scandal.

"Is it justice when the powerful are not held to account, and citizens are prosecuted for calling them out?"

The ruling comes as new Energy Secretary Ed Miliband has ordered an immediate ban on new drilling in the North Sea.

**OTHERS LIKED**



# **EXCLUSIVE** Revealed: The eco mob plot to ruin the summer holidays with activists planning to disrupt flights by glueing themselves to major airport runways

By [PIRIYANGA THIRUNIMALAN](#) and [TOM KELLY](#)

**PUBLISHED:** 22:32, 9 March 2024 | **UPDATED:** 06:39, 10 March 2024



**25**  
shares

**180**  
View comments

HB-88

Eco-zealots are plotting to ruin family holidays this summer by wreaking havoc at airports across the country.

An undercover investigation by The Mail on Sunday can reveal mobs of **Just Stop Oil** activists plan to storm terminal buildings to hold sit-ins, glue themselves to runways and even climb on to jets to paralyse the travel industry.

**Tory** MPs last night accused the group of harming their cause by 'targeting happiness with misery' and warned their cavalier plans could risk lives.



Blueprints for the summer of chaos – which aims to bring flights to a standstill day after day and destroy the holidays of 'ordinary people' – were unveiled at a strategy meeting of 100 hardcore campaigners in **Birmingham** last week.

At the meeting, which was attended by an undercover reporter, JSO co-founder Indigo Rumbelow was greeted by cheers as she told the audience: 'We are going to continue to resist. We're going to ratchet it up.'





Eco-zealots are plotting to ruin family holidays this summer by wreaking havoc at airports across the country



The Mail on Sunday can Just Stop Oil activists plan to storm terminal buildings to hold sit-ins, glue themselves to runways and even climb onto planes to paralyse the travel industry

'We're going to take our non-violent, peaceful demonstrations to the centre of the carbon economy. We're going to be gathering at airports across the UK.'

Ms Rumbelow, the 29-year-old daughter of a property developer, has previously been arrested for conspiracy to cause public nuisance during the King's Coronation and made headlines last year when **Sky News** host Mark Austin had to beg her to 'please stop shouting' during an interview.

Outlining a blueprint for causing travel chaos, she 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.

Miss Rumbelow told the crowd: 'We're going to be saying to the Government: 'If you're not going to stop the oil, we're going to be doing it for you.''

She cited similar protests to use as inspiration for their action, including Hong Kong students 'gathering in sit-ins in the entrances to airports, closing and disrupting them, day after day' during their protests against Chinese rule in 2019.







© Alamy Stock Photo



+8

View gallery

Activists smeared orange paint on a private jet on June 6 last year at Sylt Airport in Germany



HB-92



+8



© Alamy Stock Photo

**At the meeting she hailed German eco-activists who 'went on to runways, gluing their hands to the ground'**

She said a blind friend of hers was jailed after he 'stood on top of a plane, disrupting tens of flights', and also hailed German eco-activists who 'went on to runways, gluing their hands to the ground'.

'So, close your eyes for a moment, be imaginative, and think about what we could do together,' Ms Rumbelow said. 'We can make this happen at scale this summer.'

Previous protests by the group have included halting traffic on busy roads, targeting an Ashes Test match at Lords and vandalising paintings at the National Gallery.

Ms Rumbelow said: 'We've all in this room disrupted ordinary people in the roads... disrupted ordinary people seeing cultural events, theatre, art shows, football games.'

HB-93

## Who will pay if my flight is cancelled?

Airlines have to compensate passengers if a flight is cancelled or delayed by more than three hours – but only if they are responsible.

And unfortunately, in the case of activists targeting an airport, they



'The plan... could involve disrupting people on their holidays as well as business flights. It's not comfortable to disrupt ordinary people, but it's completely necessary because without that disruption we don't get anywhere.'

She concluded: 'Hope to see you in the summer on the runway.'

The Mail on Sunday recently exposed the activists' sinister plan to target MPs outside their homes. Last year, the MoS thwarted the plot by Animal Rebellion extremists to halt the Grand National at Aintree by storming the racetrack.

The latest plot is part of an overhaul of the structure of Just Stop Oil (JSO), with the formation of a new organisation called 'Umbrella' under which JSO will be one of four wings. It will also include a youth wing called Youth Demand, a political wing – Assemble – and one for socio-economic issues called Robin Hood.

Speaking about Youth Demand, JSO member Sam revealed: 'We're going to bring the fight to the politicians and the political parties.'

'High-profile actions are going to be happening in March against politicians... and in April we've got this four-day action phase. I'm not going to say the details because we want them to be nice and unprepared waiting for us.'

Private jets and newspapers could be targets under the Robin Hood actions.

One activist, Mel, said: 'Ideas are maybe

would unlikely to be considered at fault, says consumer champion Martyn James. In some cases the airline will still be required to get passengers to their destination – though this will depend on what the activists do.

If Just Stop Oil force cancellations by gluing themselves to runways or scaling planes, then under the law airlines are obliged to get travellers on the next available flight.

If, however, campaigners block terminals and stop passengers being able to board planes and the flight simply leaves without them, airlines are not responsible.

The other alternative is to claim for the lost holiday on insurance but this will be more complex because of the variety of policies.

Many policies won't cover you for not getting to the airport on time – which could be an issue if activists block entrances or roads leading to them.

But Mr James said it would be 'outrageous' if they did refuse to pay out in such a scenario.

'Insurance policies are here to cover you for situations like this,' he said.

'If they refuse, take it to a financial ombudsman.'





mass actions at financial institutions, maybe hitting places where billionaires go [such as] private airports and other eye-catching locations... yacht showrooms, is that a thing?

'The final idea is something around the failings of the billionaire-owned press. We should be blocking the printworks or marching on News International... I'm sure you've got some ideas.'

JSO's political 'pillar', Assemble, is looking at standing independent MPs at key constituencies that Labour needs to win in the General Election, and forming a 'House of the People' to be sworn in on the same day as the House of Commons.

Last night, Tory MP Gareth Johnson accused the group of 'targeting happiness with misery'.

**Amazon Prime Day 2024 LIVE:**  
**Top deals on big brands revealed**

DISCOVER DEALS

SHOPPING FINDER



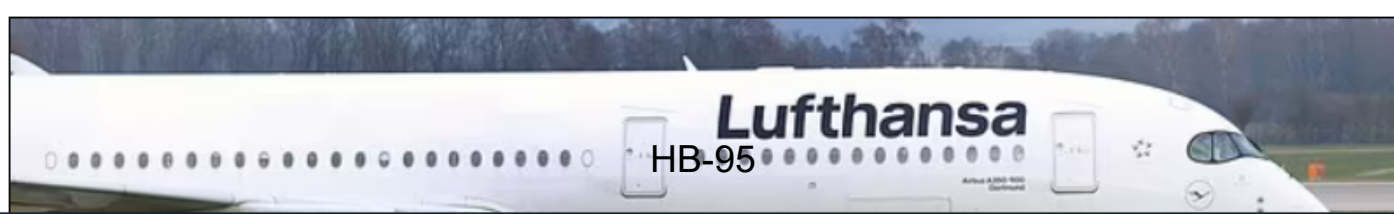
© Alamy Stock Photo



+8

View gallery

Just Stop Oil co-founder Indigo Rumbelow at protests last year





**Previous protests by the Just Stop Oil have included halting traffic on busy roads, targeting an Ashes Test match at Lords and vandalising paintings at the National Gallery**

'They are creating misery for people trying to go about their daily life and get a well-earned break with their family and children.'

'All it will do will make people angry with them and their cause. Everyone wants a clean environment but this is not the way. Running on to runways and climbing on the planes also sounds extremely dangerous and could risk lives.'

A JSO spokesman said: 'This summer, we will take action at airports to create enormous disruption and do what the rich and powerful won't: face the climate emergency and end fossil fuels.'

A spokesman for the Airport Operators Association, the trade body for UK airports, said: 'Aviation is working hard to decarbonise its activities... Instead of engaging in damaging and disruptive stunts like this, we'd call on environmental groups to work with the industry.'

[Conservatives](#)

[Sky News](#)

[Birmingham](#)

[Just Stop Oil](#)

**Share or comment on this article: Revealed: The eco mob plot to ruin the summer holidays with activists planning to disrupt flights by glueing themselves to major airport runways**



NEWS | UK

## Just Stop Oil eco-protesters plot campaign of airport disruption in threat to summer holidays

Eco activists plan to 'glue themselves to runways' in an international protest over climate change



JUST STOP OIL IS SAID TO BE TARGETING MAJOR AIRPORTS LIKE HEATHROW

PA WIRE

JOHN DUNNE @JHDUNNE  
21 APRIL 2024



---

SPONSORED

Helping cats and dogs stay safe over the summer

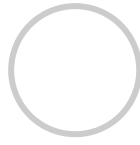


Just Stop Oil are planning a series of protests at airports across the UK and Europe which threaten to cause travel chaos for holidaymakers this summer.

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

---

## The Importance of Closing the Gender Gap



Recommended by



Hundreds of flights could be delayed by hours or even cancelled as part of the plot by 50 activists, according to the Mirror.

Just Stop Oil's Phoebe Plummer reportedly warned of “disruption on a scale that has never been seen before” at a meeting attended by an undercover journalist. The group has been critical of the airline industry over its carbon footprint.

She said: “The most exciting part of this plan is that [it’s] going to be part of an international effort. Flights operate on such a tight schedule to control air traffic that with action being caused in cities all around the world we’re talking about radical, unignorable disruption.”

---

She added: “It’s time to wake up and get real – no summer holiday is more important than food security, housing and the lives of your loved ones. Flying is also a symbol of the gross wealth inequality that’s plaguing our society and if we want to create change we need to adopt a more radical demand.”

Just Stop Oil is planning an alliance with Europe-based A22 Network to cause disruption at major international airports.



**A PERFORMANCE OF LES MISERABLES AT THE SONDHEIM THEATRE WAS STOPPED WHEN JUST STOP OIL ACTIVISTS STORMED THE STAGE ON OCTOBER 5 LAST YEAR (JUST STOP OIL/PA)**

PA MEDIA

Clive Wratten, of the Business Travel Association, said: “These planned protests are a blunt instrument that will alienate the people who can bring the change Just Stop Oil wants. The activists should work with British businesses to create meaningful solutions to our climate crisis.

“They should join airlines and their supply industry in bringing forward sustainable fuels and best practices, and we urge protesters to reconsider chaos bringing progress to a standstill.”

---

**READ MORE**

---

Matthew McConaughey says he wants to run for office as he slams politics for being like the 'Real Housewives'

---

Hearts vs Tottenham LIVE! Friendly match stream, starting lineups, latest team news TV, prediction today

---

Coldplay set for epic 10-night stint at Wembley Stadium in record-breaking move

---

**SPONSORED**

First look at exceptional new London properties for sale in 2024

---

Home Secretary James Cleverly said: “Selfish, disruptive protesters who wreak havoc in people’s everyday lives must be stopped. We have given the police more powers to tackle criminals posing as protesters and are backing officers with the tools they need to prevent serious disruption and disorder. More than 600 protesters were arrested during Just Stop Oil’s latest campaign.”

Conservative MP Gary Johnson told the Mirror: “The actions of Just Stop Oil are counterproductive and put people off their cause. Most people want to see the environment protected but militant, highly disruptive protests just anger those who are often just trying to enjoy a family holiday.”

However a Just Stop Oil spokesman said UK government policy on climate change meant the group’s actions were justified.

They said: “In normal circumstances, the sort of activities you’ve outlined would be unacceptable. However, what is more unacceptable is the last 10 straight months of record-breaking temperatures, governments continue to

---


More than half of British people plan to travel abroad this summer and three in five have already booked, according to Post Office Travel Money.

Just Stop Oil was founded in 2022 to try to cease the issuing of all new oil, gas and coal licences in the UK.

It has staged dozens of high profile protests, many involving disrupting London traffic.

It has also targeted an Ashes Test match at Lords and members ran on stage during a performance of Les Miserables in the West End.

**MORE ABOUT   AIRPORTS   PROTESTS   JUST STOP OIL   SUMMER HOLIDAY**

 HAVE YOUR SAY...

**VIEW 3 COMMENTS**   





## Cat's out the bag. Just Stop Oil will take action at airports ✈️



By Just Stop Oil

📍 United Kingdom

956 1999  
Supporters Shares

Share

## 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**.



*Ordinary people taking action at airports across Europe*

## **Governments promised to stop heating at 1.5°C. They've now failed us all.**

In 2016, leaders came together and promised to keep heating under 1.5°C as part of the Paris Agreement. Past that our government knows we risk heating spiralling out of control — escalating fires, floods, storms and food shortages.

**Last year, heating smashed through to 1.52°C above the pre-industrial average.** Sunak's response? Silence. In January 2024 we reached 1.66°C of heating. We are facing a worst-case scenario and our governments are in a state of fear and denial. It's time to turn up the pressure. **We're going to resist this carbon regime with all we've got.**

## **You've heard the plan. Now let's make sure everyone in the UK knows it.**

To pull this off, we need to mobilise people across the country. Over 80% of people in the UK are concerned about the climate crisis and in the last year, thousands of people have taken part in radical action. We can do this. But we need proper funding to make it happen.

**We need to raise £50,000 in the next month to fund our biggest push yet.** With your help, we'll hold meetings up and down the country, explaining our

**£24,349**

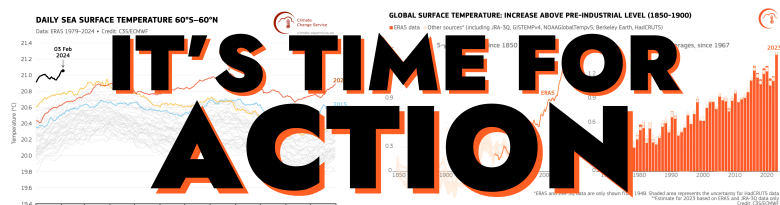
Raised of £50,000

**Donate now**

plan, building teams and getting people prepared for action.

Here's how your support could make a difference:

- 👛 — **£25** could pay for a bus or train ticket for a young person to attend a meeting
- 👛 — **£50** could buy a stack of posters to spread the word.
- 👛 — **£100** could help put on a soup night to build community for people taking action.
- 👛 — **£500** could rent a hall for a talk near you
- 👛 — **£1000** could pay for a powerful combination of all these things, empowering ordinary people to take action against our criminal government.



## We have to do this. Now.

Just Stop Oil are demanding an end to the licensing of new oil and gas projects in the UK — this is the basic first step of any government serious about dealing with the climate crisis. The International Energy Agency (IEA) has said there must be no new investment in new gas, oil or coal extraction projects from now on if we have any chance of avoiding catastrophic heating.

**We won't be the first.** France, Italy, Denmark, Sweden, Portugal, Costa Rica, Ireland and Wales have already made commitments to end the licensing of oil and gas. But that good work is undone when our Prime Minister vows to “max out” oil and gas in the North Sea.



We don't store your card details. All donations are processed securely by our PCI-compliant payment partners, Stripe and PayPal.



Just Stop Oil will have quick and easy access to your donation.



We've helped empower over 15,000 campaigners like Just Stop Oil by helping them raise the funds they need.

The UK is second only to Norway as Europe's biggest fossil fuel producer (or should we say, carbon polluter). What we achieve here *will* echo across the globe. We have to stop new oil and gas.

## We know direct action makes the difference.

At home, every major political party – except the Conservatives — has promised to stop licensing new projects. Media debate over oil and gas licensing is through the roof. An ex-government minister resigned as an MP in protest against new licences. We've proven we can hold the spotlight on our leaders if we keep up the pressure.

**And we've done the groundwork.** Public facing action throughout 2023 has built Just Stop Oil into the UK's biggest radical action group. **What we need now is the time and funds for a campaign that will hit polluters hard.**

## Will you support those standing in defiance?

Can you chip in and support? We need you. Together we will Just Stop Oil.

*Can't donate but want to support? Sign up to take action [here](#).*

---

## Supporters (956)



**Anonymous** - 22 hours ago

**£29**

HB-106

## NEWS

[Home](#) | [InDepth](#) | [Israel-Gaza war](#) | [Cost of Living](#) | [War in Ukraine](#) | [Climate](#) |[More](#)[UK](#) | [World](#) | [Business](#) | [Politics](#)[England](#) | [Local News](#) | [London](#)

# Dozens of campaigners held over alleged airport plans



Police said the Just Stop Oil members had been arrested under the Public Order Act

27 June 2024

Updated 28 June 2024

**Dozens of Just Stop Oil supporters suspected of planning to disrupt airports this summer have been arrested across England.**

The Metropolitan Police said 27 people were taken into custody, including some believed to be "key organisers" for the climate group.



Six arrests were made in east London, four at Gatwick airport, and the rest from forces across the country.

The force added the six who were arrested on Thursday evening at a community centre in London were there "as part of a publicly-advertised event promoting airport disruption".

The operation took place in Gloucestershire, Oxfordshire, Devon, Essex, Manchester, Surrey, Sussex, Norfolk and West Yorkshire, a Met spokesperson said.

The 27 were detained under the Public Order Act which makes it illegal to conspire to disrupt national infrastructure.

Four people arrested on Tuesday after being identified at Gatwick Airport and have since been released on bail.

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

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

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

Suspects released on bail are subject to conditions which include not travelling within one kilometre of any UK airport unless passing by while on a mode of transport.

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

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

*Listen to the best of BBC Radio London on **Sounds** and follow BBC London on **Facebook**, **X** and **Instagram**. Send your story ideas to [hello.bbclondon@bbc.co.uk](mailto:hello.bbclondon@bbc.co.uk)*

## Related Topics

Transport

London

Just Stop Oil

## More on this story



[Officers making an arrest as part of the co-ordinated operation]

NEWS - 28 JUNE 2024 13:10

## Arrests made as Just Stop Oil plan summer disruption



**Supporters of Just Stop Oil suspected of planning to disrupt airports this summer have been arrested in a co-ordinated operation.**

A total of 27 people have been held as part of activity in London, Gloucestershire, Oxfordshire, Devon, Essex, Manchester, Surrey, Sussex, Norfolk and West Yorkshire.

[Skip to content](#)

All the individuals were arrested under a section of the Public Order Act which makes it illegal to conspire to disrupt national infrastructure.

On Tuesday, four people were arrested after being identified at Gatwick Airport. They have been released on bail.

On Thursday evening, six people were arrested at an east London community centre as part of a publicly-advertised event promoting airport disruption.

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

This morning, Met officers worked with more than eight other police forces to arrest suspects at their homes across the country. A total of 17 people were arrested.

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

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

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

All those released on bail are subject to conditions which include not to travel within 1km of any UK airport unless passing through by vehicle or public transport.



In future, anyone suspected of breaching this condition can be arrested immediately for this offence.

## Topics

[Police matters](#)

## Categories

[Police Operation](#) [Arrest](#)

## Regions

[London](#)

## Related media

[Download images for media use](#)



# Metropolitan Police

Media enquiries only - [press.bureau@met.police.uk](mailto:press.bureau@met.police.uk)

For all other contact with the Metropolitan Police please visit [www.met.police.uk](http://www.met.police.uk), call 101 or in an emergency always call 999



## Metropolitan Police

[Metropolitan Police website](#)

[Stats and data](#)

[Accessing information \(FOIA\)](#)

[About the Met](#)

[Contact the Met](#)



**UK news**

## Dozens of Just Stop Oil activists arrested on suspicion of planning to disrupt airports

**'Several high-profile members' among 27 supporters of climate group arrested across England, say police**

---

---

**PA Media**

Fri 28 Jun 2024 14.06 BST

Twenty-seven Just Stop Oil supporters have been arrested on suspicion of planning to disrupt airports this summer, the Metropolitan police have said.

Arrests were made in London, Gloucestershire, Oxfordshire, Devon, Essex, Manchester, Surrey, Sussex, Norfolk and West Yorkshire, the force said.

The supporters were arrested under a section of the Public Order Act that makes it illegal to conspire to disrupt national infrastructure. "Among those held were several high-profile members of Just Stop Oil who we believe to be key organisers," police said.

On Tuesday, Scotland Yard said four people were arrested after being identified at Gatwick airport and released on bail. A further six people were arrested at an east London community centre "as part of a publicly advertised event promoting airport disruption".

Met officers then worked with more than eight police forces across the country to arrest suspects at their homes across the country, arresting another 17 people on

HB-113

Friday.

In a statement, Just Stop Oil said: “Supporters are deeply committed to protecting their families and communities from the tyranny of fossil fuels. If our government refuses to do what is right to protect humanity, then people will step up to do what needs to be done. We refuse to die for fossil fuels and we refuse to stand by while millions are murdered.

“We demand that our government stops the extraction and burning of oil, gas and coal by 2030 and that they support and finance other countries to make a fast, fair and just transition.”

Ch Supt Ian Howells, who led the operation, said: “We know Just Stop Oil are planning to disrupt airports across the country this summer which is why we have taken swift and robust action now Our stance is very clear that anyone who compromises the safety and security of airports in London can expect a strong response from officers or security staff.

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

All those released on bail are subject to conditions, which include not travelling within 1km of any UK airport unless passing through by vehicle or on public transport. Anyone suspected of breaching this condition can be arrested immediately.

---

---

---

Advertisement

---

## Most viewed

Advertisement





## **We refuse to die for fossil fuels – Just Stop Oil response to police raids resulting in at least 27 arrests.**

Press / June 28, 2024

Over the last 12 hours the British state has acted unlawfully in detaining a total of at least 27 ordinary people sharing food at a community event and at their homes. Their only crime? They are Just Stop Oil supporters.

Being a Just Stop Oil supporter is now enough to make you a suspect. Believing that no government has the right to tyrannise the entire world by encouraging the extraction and burning of fossil fuels, marks you out as a dangerous radical.

But we will not be intimidated. The painful truth right now is that our politicians and corporations have no

We use cookies on our website to give you the most relevant experience by remembering your preferences and repeat visits. By clicking "Accept All", you consent to the use of ALL the cookies. However, you may visit "Cookie Settings" to provide a controlled consent.

[Cookie Settings](#)

[Accept All](#)

this, there has never been a democratic mandate to destroy the habitable world.

Just Stop Oil supporters are deeply committed to protecting their families and communities from the tyranny of fossil fuels. If our government refuses to do what is right to protect humanity, then people will step up to do what needs to be done. We refuse to die for fossil fuels and we refuse to stand by while millions are murdered.

That's why we are joining an international uprising taking nonviolent collective action to defend humanity. Sign up to take action at [juststopoil.org](https://juststopoil.org).

We demand that our government stops the extraction and burning of oil, gas and coal by 2030 and that they support and finance other countries to make a fast, fair and just transition. They must sign the Fossil Fuel Treaty to end the war on humanity before we lose everything.

---

[← Previous Post](#)

[Next Post →](#)

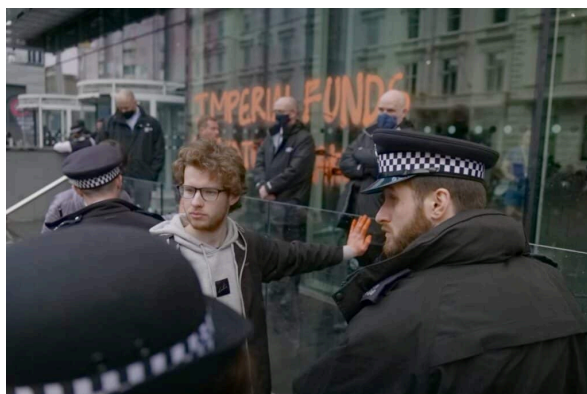
---

## Related Posts



Breaking: 'Just Stop Oil' youth campaigners deliver ultimatum to Boris Johnson

Press / February 14, 2022



Two Students Spray Paint Three London Universities As Part of 'Just Stop Oil' Campaign

Press / March 2, 2022

Just Stop

We use cookies on our website to give you the most relevant experience by remembering your preferences and repeat visits. By clicking "Accept All", you consent to the use of ALL the cookies. However, you may visit "Cookie Settings" to provide a controlled consent.

[Cookie Settings](#)

[Accept All](#)

# Munich Airport forced to close for two hours after climate protesters glue themselves to runway

The airport in southern Germany was closed to take-offs and landings for nearly two hours but has since reopened.

🕒 Saturday 18 May 2024 12:00, UK





The protesters (in orange) began their action at about 4.45am local time Pic: AP



 Why you can trust Sky News >

## **Eight climate protesters have been arrested after shutting down Munich Airport and causing about 60 flight cancellations.**

Six of the activists glued themselves to a runway access road early on Saturday morning, but the situation is now under control with both runways open.

Climate protest group Last Generation took responsibility in videos on X showing its members wearing orange vests on the tarmac.

"A total of six people are sitting in two groups on different locations of the Munich airport," one of the posts said.



"It is absurd that people can afford flights more than train journeys," said another post from the group.

"The responsibility for this lies with the government: it subsidises flights while the railways are ruined by cost-cutting."

An airport spokesperson said it had been fully closed to take-offs and landings for nearly two hours.

Some 11 flights were also diverted, around 60 cancelled, and delays were still possible, the spokesperson added.

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



Pic: AP



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

June 02, 2024 by Extinction Rebellion

**Contact:** Tom Maidment 07900 065913 | Carol 07791 737093  
[press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk)

**Location:** W3W copy.tree.alarm

**Images:** [Link for photos](#)

Extinction Rebellion climate activists are blocking access to Farnborough Airport this morning (Sunday 2 June) to protest against the increasing use of highly polluting private jets by the super-rich and to call on the government to ban private jets, tax frequent flyers and make polluters pay.

Today's blockade is part of a global week of action against private aviation under the banner Make Them Pay with actions in Denmark, Germany, Mexico, Norway, Sweden, Switzerland and the US, and follows Europe's largest private jet convention EBACE in Geneva this week.

In Farnborough, protesters have barricaded the airport's Gulfstream Gate with the iconic XR pink boat with "LOVE IN ACTION" painted on the side, Ively Gate has four protesters locked on to oil drums, and the airport's departure gate has an activist mounted on a tripod blockading the entrance. Police have seized a second tripod.

A fourth group of protesters are playing cat and mouse with the airport authorities, moving between the airport's other gates to block them. At all three main gates, protesters are releasing colourful smoke flares, chanting slogans and engaging with members of the public, accompanied by the XR Rebel Rhythms band of drummers.

The activists are supported at all three main entrances to the airport by scores of demonstrators holding banners reading "FLYING TO EXTINCTION", "PRIVATE FLIGHTS = PUBLIC DEATHS", "STOP PRIVATE FLIGHTS", "PRIVATE FLIGHTS COST THE EARTH" and "TAX FREQUENT FLYERS".

Climate activists are targeting Farnborough Airport in an escalating campaign because it is the UK's largest private jet airport. Last year 33,120 private flights landed and took off from its runways, carrying an average of just 2.5 passengers per flight, making them up to 40 times more carbon intensive than regular flights. Currently 40% of flights to and from the airport are empty. The airport is now seeking planning permission to increase the number of planes taking off or landing from a maximum of 50,000 a year to up to 70,000 a year.

Farnborough Airport claims to be a centre for business aviation yet around 50% of Farnborough flights headed to the Mediterranean during summer months, rather than business locations, with around 25% heading to Alpine destinations during the winter months. Last year a service was launched specifically to shuttle dogs and their owners to Dubai and back.

The demonstration includes campaigners from Extinction Rebellion, who have joined forces with local residents, Quakers, and campaign organisations Farnborough Noise Group, Blackwater Valley Friends of the Earth, and Bristol Aviation Action Network to voice their opposition to the airport's expansion plans.

**Dr Jessica Upton, 54, from Oxford, a Veterinary surgeon and foster carer said:** "I'm here today because private airports are an abomination. Expanding Farnborough would be putting the indulgent wants of the rich minority over the needs of the majority. Local people need cleaner air and less noise pollution, and the world's population urgently

needs rapid reductions in greenhouse gas emissions to survive. Private airports disproportionately contribute to climate breakdown and closing them would boost our chances of sticking to the Paris Climate Accords, the supposedly legally binding international treaty agreed to and signed by our government.“

**Daniela Voit, 37, from Surbiton, a Shiatsu Practitioner and Teacher, said:** “Last year we hit a global average temperature rise of 1.5°C degrees celsius over an entire year. For decades we were told a 1.5°C rise needs to be avoided to avoid catastrophic changes to our lives due to the planetary warming caused by humanity’s CO2 emissions. We can see the consequences of this temperature rise all over the world – currently immense flooding in Brazil and Afghanistan and temperature of 52C in Pakistan. To carry on flying in private jets, one of the biggest causes for CO2 emissions per person, in a time of climate crisis is reckless. The rich 1% that are flying from Farnborough Private Jet Airport seem to think they are exempt from taking responsibility for what they are doing to our only home. Banning Private Jets is one of the first things we need to do to stop further temperature rises. This is vital to ensure the survival of all life – human, animal and plant – on this planet that we call our Mother Earth.”

### **Make Them Pay demands:**

**1) Ban private jets.** Flying in a private jet is the most inefficient and carbon-intensive mode of transport. Flights on private jets can be as much as 40 times more carbon-intensive than regular flights, and 50 times more polluting than trains. A four-hour private flight emits as much as the average person does in a year. Private jet use is entirely inappropriate during a climate emergency. There’s strong public support for banning private jets and banning this mode of travel was a key recommendation of the Climate Assembly.

**2) Tax frequent flyers.** Various citizens’ assemblies, for example in the UK, Scotland, and France, have recommended that frequent flyers and those who fly further should pay more.

They believe this would “address issues of tax fairness, as currently those who don’t fly are subsidising those who do” and that “this would deliver significant behaviour changes across society and have a positive impact on reducing overall carbon emissions caused by flying.”

Taxes on air travel would be a socially progressive way of raising climate funds and have been proposed by the group representing the most vulnerable countries at COP27 as an effective way to raise climate finance and pay for loss and damage, alongside debt cancellation.

**3) Make polluters pay.** It is only fair that the wealthiest in society and the highest-

income, highest-emitters pay for their climate damage, and pay the most into climate Loss and Damage funds for the most affected peoples and areas to mitigate and adapt to the worst impacts of climate change.

The top 1% of the global population by income are responsible for more emissions than the bottom 50% combined. So not only is it a question of morality that the wealthiest in society pay the most, and commit to the most rapid emissions reductions – it's also a mathematical necessity and a question of practicality and science.

## About Extinction Rebellion

Extinction Rebellion (XR) is a decentralised, international and politically non-partisan movement using non-violent direct action and civil disobedience to persuade governments to act justly on the Climate and Ecological Emergency.

[Donate](#) | Support our work

[What Emergency?](#) | Read about the true scale of the climate crisis

[Why Citizens' Assemblies?](#) | Breaking the political deadlock

[XR UK Local Groups](#) | View a map of all local groups

[XR UK website](#) | Find out more about XR UK

[XR Global website](#) | Discover what's going on in XR around the globe

Time has almost entirely run out to address the climate and ecological crisis which is upon us, including the sixth mass species extinction, global pollution, and increasingly rapid climate change. If urgent and radical action isn't taken, we're heading towards 4 ° C warming, leading to societal collapse and mass loss of life. The younger generation, racially marginalised communities and the Global South are on the front-line. No-one will escape the devastating impacts.

## RELATED TOPICS

Extinction Rebellion

Farnborough Airport

Private Jets

SHARE



## RECENT ARTICLES

---

09/07/24

Activists scale East Sussex County Hall roof to demand council cuts ties with Big Oil

---

08/07/24



## NEWS

[Home](#) | [InDepth](#) | [Israel-Gaza war](#) | [Cost of Living](#) | [War in Ukraine](#) | [Climate](#) |[More](#)[UK](#) | [World](#) | [Business](#) | [Politics](#)[England](#) | [Local News](#)

# Women deny £52k spray paint damage to private jets



GETTY IMAGES

The jets appeared to have been sprayed at London Stansted Airport on Thursday

**Alex Pope & PA Media**

BBC News, Essex

22 June 2024

**Two women have denied causing £52,000 worth of damage after private jets were sprayed with orange paint by Just Stop Oil activists at Stansted Airport.**

Jennifer Kowalski, 28, and Cole Macdonald, 22, pleaded not guilty to causing criminal damage and interfering with national infrastructure.

Ms Macdonald, of Baker Street, Brighton, East Sussex, and Ms Kowalski, of Williamson Avenue, Dumbarton, in West Dumbartonshire, were not asked to enter pleas to a third charge of aggravated trespass.

Just Stop Oil had said the private jet of popstar Taylor Swift was at the Essex airport, but police said it was not there at the time.

The pair were accused of using angle grinders to break through an airport fence at about 05:00 BST on Thursday before entering a taxiway with fire extinguishers filled with orange spray paint.

Prosecutors said the cost of cleaning up the paint was £52,000, but the full extent of the damage to the fence and extra security was not known.

Chelmsford Magistrates' Court heard 75 flights were disrupted during a 38-minute delay, affecting thousands of passengers.

The pair were denied bail and were due to appear for another hearing at Chelmsford Crown Court on 22 July.

*Follow Essex news on [Facebook](#), [Instagram](#) and [X](#). Got a story? Email [eastofenglandnews@bbc.co.uk](mailto:eastofenglandnews@bbc.co.uk) or WhatsApp us on 0800 169 1830*

## Related Topics

London Stansted Airport

Stansted

Dumbarton

Brighton

## Related internet links

Essex Police

HM Courts and Tribunals Service

## Top Stories



ADVERTISEMENT

# Just Stop Oil 'plan to disrupt airports' in a 'sustained period of action' after spray paint attack on Stansted VIP airfield and Stonehenge

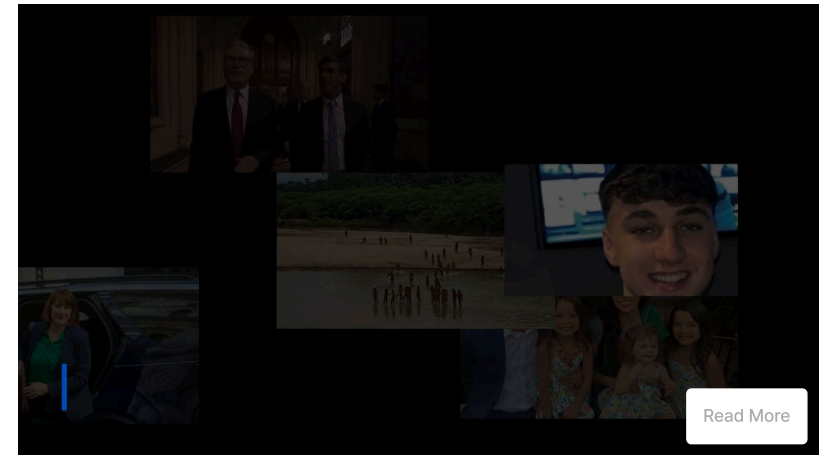
By [MATT DRAKE](#)  
PUBLISHED: 18:50, 21 June 2024 | UPDATED: 22:18, 21 June 2024

9 shares 139 [View comments](#)

**Just Stop Oil** (JSO) will stage a campaign of 'sustained action' against airports over the summer holidays which could potentially ruin people's holiday plans.

The climate group has made headlines in recent weeks for its latest stunts including spray painting Stonehenge and spraying two private jets at Stansted airport.

But according to a source, the stunt at Stansted on Thursday was only a 'prelude' to plans to disrupt even more airports over the coming months.



Speaking to The Times, the source said: 'This is just another way of us taking action in the theatres of life we exist in because we're not politicians.'

☒ Site ☐ Web

Enter y

ADVERTISEMENT

## TOP STORIES

- EXCLUSIVE [The REAL reason behind Maya Jama and Stormzy's split revealed as couple 'call it quits' after second attempt at romance](#)
- EXCLUSIVE [Strictly scandal deepens as footage of ex-pro James Jordan throwing a chair and telling partner Georgina Bouzova he will 'drag her across the floor'](#)
- [▶ Thomas Crooks' parents 'called the cops on the day of the Trump rally shooting'](#)



Jennifer Kowalski, 28, (left) and Cole Macdonald, 22, (right) were arrested on suspicion of criminal damage after gaining access to the airfield and damaging the private jets



The stunt at Stansted on Thursday was only a 'prelude' to plans to disrupt even more airports over the coming months, a source claimed



EXCLUSIVE **Adar Peaty** opens up on his recovery for Paris 202 after hitting 'self-destruct' and turning t alcohol

ADVERTISEMENT

► **Keir Starmer** boasts Labour's 'new era' taking control of rail, energy and planning system as firms voice alarm at French-style workers' rights and bolstered ...

The surprising health benefits of orgasms: From boosting your immune system to unblocking your nose

► Have house prices risen or fallen in YOUR area? Use our interactive calculator to find out - as data shows average UK home increased in value by £6,000 last yea...

The 16 best places to invest in property in Britain: Estate agents say prices will soar in the towns - here's what you can get NOW for as little as £218,261

► **Dubai princess** 'appears to dump her husband by posting brutal Instagram message two months after welcoming their first child'

ADVERTISEMENT

The JSO protesters targeted the VIP area of the airport hours after Taylor Swift's plane was there

Cringeworthy JSO eco-muppets brag about spraying private jet

▶

Watch the full video

⏮

▶

⏭

🔊

0:00 / 0:32

f

✉

🔗

🔗

</>

⚙

↗

TRENDING

**Animation reveals how Trump could have been killed**

6.2k viewing now

**The silhouette, the smile. Why nobody does it like Kate: LIZ JONES**

59.5k viewing now

**Major outlet's editor 'wants to ban Trump assassination attempt pic'**

15.3k viewing now

'Private jets are obviously mental for emissions and most people would agree they need to stop.

'It's a wake-up call for government that we need big radical changes.

'If this incoming government doesn't get us on war footing then we're not going to have anywhere to fly to.'

A JSO spokesman told MailOnline: 'We have smashed through the 1.5 degree threshold that was supposed to keep us safe, the consequences of this are catastrophic and this is leading to runaway extreme temperatures that are making large parts of the world unable to support human life. We cannot continue business as usual.

'To protect our families and communities we need an emergency, international legally binding treaty to phase out fossil fuel burning by 2030.'

When asked whether they would disrupt people's summer holidays, the spokesman said: 'We will be taking action at sites of key importance to the fossil fuel economy to demand an emergency, international legally binding treaty to phase out oil, gas and coal burning by 2030.'

On Wednesday, two JSO activists were arrested and later bailed for throwing orange powder paint at Stonehenge.

Rajan Naidu, 73, and Niamh Lynch, 21, ran up to the stones and attacked them as members of the public tried to intervene.

▶ **Money talks!** New series sees celebrity property expert Tayo Oguntomade help one family plan for the future (and their forever home)  
**AD FEATURE**

The silhouette, the smile. Why nobody does it like Kate: LIZ JONES

▶ **Primary school teacher, 30, who 'worked openly' as a £1,600-a-night escort and posted pictures of her and her partner having sex on a 'swingers' site' is struck...**

▶ **Tracey Cox reveals the 6 surprising sex experiences most men crave - but will never admit to (and they're a lot more 'vanilla' than you might expect!)**

'I've never heard from her since that day': Dog saviour of Kabul Pen Farthing reveals how his wife left him in the most unexpected way as his life fell apart af...

▶ **Desperate for sunshine? It's not too late to go and find it! Here's our pick of the best last-minute summer deals**  
**AD FEATURE**

Physically unfit, under-qualified agent with a diversity-obsessed boss chosen by Dr Jill Biden! After Secret Service botches the Trump shooting, ANDREW NEIL ex...

▶ **Incredible new video shows uncontacted hunter-gatherer Mashco Piro tribe brandishing spears on banks of a river in Peruvian rainforest**

▶ **Rose Ayling-Ellis compares Strictly partner Giovanni Pernice's behaviour in rehearsals to a 'lizard' in unearthed clip**

▶ **Graziano Di Prima's wife Giada Lina responds to Zara McDermott's statement after Strictly dancer was sacked for 'hitting and kicking her'**

HB-128





Cole Macdonald poses in front of her handywork while wearing a Just Stop Oil T-shirt



The activists were arrested on suspicion of criminal damage and interference with the use or operation of national infrastructure



An image grab from a video released by the Just Stop Oil climate campaign group shows activists spraying an orange substance at Stonehenge in Wiltshire

Read More

ADVERTISEMENT

This tragic Jay Slater find raises more questions than it answers: I've been to that ravine and the discovery of a body only now leaves me dumbfounded, writes F...

Nigel Farage and the real reason Labour has dropped votes for 16-year-olds... writes STEPHEN POLLARD

► Mortgage broker strangled his 'gym bunny' wife to death after sex to cash in on her life insurance and pay off £300,000 deb before trying to play the grieving ...

► Eva Longoria, 49, shows off her incredible figure in an orange bikini as she enjoys at day at the beach with her son Santiago, 6, in Marbell

AMANDA PLATELL: More heads must roll on Strictly over what seems to be a sordid cover-up

► Power in your palm: Top 10 apps to help yo level up your everyday - from working out to gardening  
AD FEATURE

► Strictly's Zara McDermott was 'too scared to speak up' about her 'distressing' experience with Graziano Di Prima

Britain's hangman whc sent the Beasts of Belsen to hell: How

Just Stop Oil protesters who sprayed Stonehenge are bird-watching Oxford student, 21, and Quaker, 73



Video footage showed two people wearing white shirts with the Just Stop Oil slogan, approaching the stone circle with canisters and spraying orange powder paint.

The group claimed it would wash off in the rain but archaeologists are concerned about potential damage to the 5,000-year-old world icon and landmark.

Tim Daw, a local farmer and historic property steward who used to volunteer at the site, carried out an experiment by mixing cornflour and food dye and then applying it to a small piece of sarsen, which is the same stone as Stonehenge.

On the piece of sarsen a series of little black dots are visible, which are the lichen.

Mr Daw described this on BBC Breakfast as a 'very, very rare plant organism that grows on rocks' which 'takes hundreds of years to grow because there's no nutrition'.



Tim Daw washed the bottom half of the piece of stone before gently rubbing it – and noticed that the cornflour was in the stone's pores and therefore 'displacing the lichen'

Former Stonehenge volunteer 'shocked and saddened' at vandalism



I was shocked and saddened. I couldn't believe it.

- ▶ [Albert Pierpoint executed 13 Nazis on a single day in 1945 and killed 200 war criminals in total ...](#)
- ▶ [Is Britain going veggie by stealth? MailOnline reveals the 'pork' sausages on supermarket shelves that contain more fake meat than the real thing](#)
- EXCLUSIVE [The REAL reason Jack Black cancelled the Tenacious D tour after bandmate Kyle Gass' 'dangerous' comments about Donald Trump](#)
- ADVERTISEMENT
- ▶ [A dermatologist debunks common out-of-date myths about summer skincare \(but how many do YOU still believe?\)](#)
- AD FEATURE
- [How taking grandkids to zoo boosted my state pension by £20,000](#)
- ▶ [Tesco shoppers' fury as supermarket giant introduces new high-tech cabinets to lock alcohol away to stop thieves - forcing customers to complete four-stage process...](#)
- ▶ [WFH from day one? Business alarm at immediate rights to flexible working, sick leave and dismissal protection as experts warn of swathe of](#)



He then washed the bottom half of the stone before gently rubbing it and noticed that the cornflour was in the stone's pores and therefore 'displacing the lichen'.

Mr Daw told the show that he was 'worried' about the lichen on the monument, and said of yesterday's attack: 'I was shocked and saddened. I couldn't believe it.

'Stonehenge is so precious, not just to me but to so many people. To do this act, which I think has worked against their cause, just seems pointless and damaging.'

Rishi Sunak and Sir Keir Starmer were united in the condemnation of Just Stop Oil after the incident.

The Prime Minister described it as a 'disgraceful act of vandalism' while the Labour leader branded the group 'pathetic'.



Rajan Naidu, 73, and Niamh Lynch, 21, ran up to the stone circle at around 12pm Wednesday

Read More

**BREAKING NEWS** Security fears as Just Stop Oil break into Stansted's VIP airfield and spray paint private jets



Then on Thursday, two JSO activists broke into the VIP section at Stansted airport and sprayed two jets with orange paint.

Jennifer Kowalski, 28, and Cole Macdonald, 22, were arrested on suspicion of criminal damage after gaining access to the airfield and damaging the private jets.

Although Taylor Swift's private jet had been there hours earlier, it was not affected.

JSO also made headlines in 2022 after two activists threw soup on Van Gogh's Sunflowers at the National Gallery.

Last week, JSO delivered letters to every major political party to demand they sign a legally binding treaty to stop the extraction and burning of oil, gas and coal by 2030.

The group threatened to begin a 'new campaign of civil resistance' if the incoming prime minister did not support the treaty.

summary sackings befo...

Who is the Duchess of Wellington? Lesser known royal, 69, turns heads at State Opening of Parliament

Secret coves and stunning cities: How Adele Roberts and Kat Holderness fell in love with magical Malta AD FEATURE

Paris suffers an Olympic breakdown: A growing migrant crisis sewage-filled Seine, a bedbug infestation, alienated residents... and comparisons to a 'warzone'

Animation reveals how Donald Trump could have been shot 'right in the head' if he hadn't turned to look at immigration chart

Revealed: The 20 areas most at risk from Labour's house building boom

I've spent £40,000 on five boob jobs - but now my love life is a flop because men are intimidated by my 75N breasts

Do you own a business? Here's how to reach millions of potential customers with ads you can TRUST AD FEATURE

Where it all went wrong for England: The behind-the-scenes grumbles at Jude Bellingham's preferential treatment dressing room tantrums... and Gareth Southgate...

Cranky Charles strikes again! King appears to get frustrated as page boy adjusts his robe at State opening of Parliament

Disturbing moment woman drowns in shallow end of Las Vegas pool while clutching handrail... as swimmers walk past her

DEAR JANE: I shared my family's unique dinner tradition with my best friends - they were DISGUSTED and accused me of 'cruelty'



## Just Stop Oil Letter to Prime Minister Starmer

Press / July 16, 2024

Dear Prime Minister,

We write to congratulate you on becoming Prime Minister and to acknowledge that one of the first steps of your new government has been to reaffirm your commitment to end new UK oil and gas licensing. This is an essential first step towards what is required to end the UK's contribution to the climate crisis. However, we all know that it is not enough.

We also need to rapidly phase out our existing oil and gas projects and to end the use of fossil fuels across our economy. This is not only the view of Just Stop Oil; the call for a rapid phase out of fossil fuels is backed by climate science, by global equity considerations, by international law and by global public opinion.

We last wrote to you in your role as leader of the Labour Party on 24 June to demand that, should you become our next Prime Minister, you immediately commit the UK government to **working with other**





We indicated that unless such assurances were provided by 12 July, we would be forced to take action to protect our communities by engaging in a campaign of noncooperation against fossil fuel use, at airports across the country.

We are writing now to let you know that since no such assurances have been received we remain in civil resistance and are preparing to take action, but that, as ever, we remain open to dialogue.

The era of fossil fuels is over. It's time to stop waging war on humanity.

Yours sincerely,

Just Stop Oil.

## **ENDS**

Press contact: 07762 987334

Press email: [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)

High quality images & video here: <https://juststopoil.org/press-media>

Website: <https://juststopoil.org/>

Facebook: <https://www.facebook.com/JustStopOil/>

Instagram: <https://www.instagram.com/just.stopoil/>

Twitter: [https://twitter.com/JustStop\\_Oil](https://twitter.com/JustStop_Oil)

Youtube: <https://juststopoil.org/youtube>

TikTok: <https://www.tiktok.com/@juststopoil>

## **Notes to Editors**

[1] Just Stop Oil is working with an international network of groups to demand our governments establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fast, fair, and just transition. This can be accomplished by endorsing the [Fossil Fuel Non-Proliferation Treaty Initiative](#) and seeking a negotiating mandate to establish the treaty.

Just Stop Oil is a member of the A22 Network of civil resistance projects.

Critical seed funding for Just Stop Oil was provided by [Climate Emergency Fund](#) and Adam McKay in 2022



Just Stop Oil 'Blue Lights' policy: our policy is, and has always been, to move out of the way for emergency vehicles with siren sounding and 'blue lights' on.

[← Previous Post](#)

Support  
Just Stop Oil

[Donate](#)

# Join Our Mailing List

## EMAIL SUBSCRIPTION FORM

Email \*

First Name \*

Mobile Number \*, 07400 123456

☐ I'm happy to get occasional texts and calls about specific actions or about events I've signed up to.

[Not in GB?](#)

SUBMIT

☒ Opt in to email updates from Just Stop Oil

# Extinction Rebellion protester climbs on plane at London City Airport

Another arrested protester who refused to get off a plane told passengers he was "extremely sorry for the inconvenience".



**Tom Gillespie**


News reporter [@TomGillespie1](#)

🕒 Tuesday 22 October 2019 08:24, UK



'I'm too scared': Paralympian's plane stunt



 Why you can trust Sky News >

**A Paralympic bronze medallist climbed on top of a plane at London City Airport as part of the Extinction Rebellion protests.**

Firefighters eventually removed the protester, James Brown, from the British Airways aircraft and he was arrested.

He live-streamed his actions on Facebook.



The protester, who is partially sighted, said he was nervous because he 'hates heights'



Paralympian protester removed from plane

"Okay, here I am, top of a f\*\*\*\*\* aeroplane at City Airport... I managed to get on the roof," he said.

"Oh man I'm shaking... This is all about the climate and ecological crisis. We're protesting at government inaction on climate and ecological breakdown. They declare a climate emergency and do nothing about it."

He said it was "scary" because he "hates heights".

Mr Brown, who is partially sighted, won a bronze at the London Paralympics in cycling but was later banned for a doping violation.

## MORE ON EXTINCTION REBELLION



[Extinction Rebellion climate change protest disrupts PGA golf tournament in Connecticut](#)



[Extinction Rebellion: Climate activists stage protest dancing to Stayin' Alive by Bee Gees in Edinburgh](#)



[Extinction Rebellion co-founder Gail Bradbrook avoids jail after damaging government building](#)

### Related Topics:

[Extinction Rebellion](#)

[Climate Change](#)

Last month, he was arrested for trying to fly a drone at Heathrow.

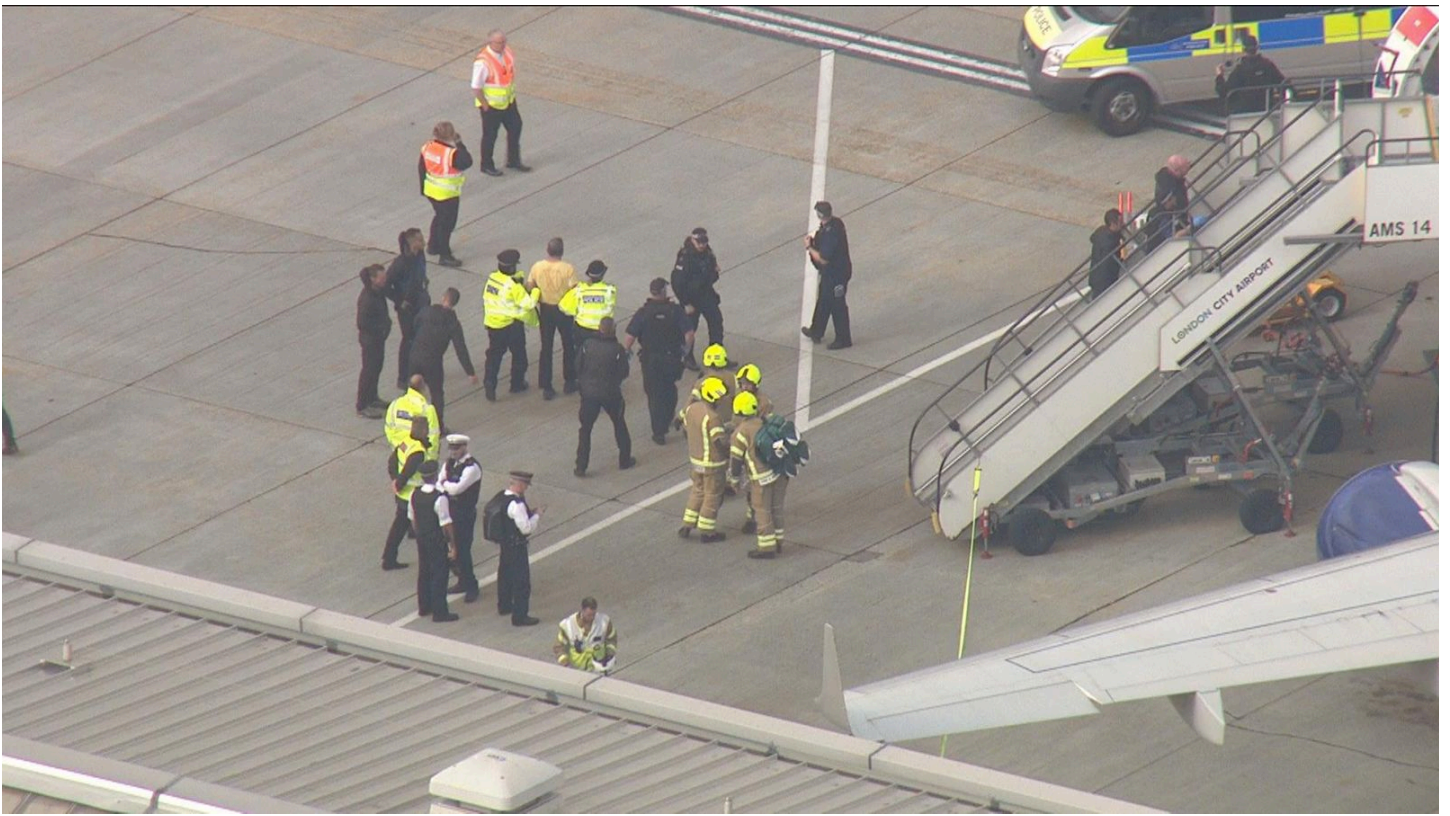
Met Commissioner Dame Cressida Dick described his actions as "reckless, stupid and dangerous".





Firefighters managed to get the man off the aircraft





Mr Brown was led away by police

Hundreds of people attempted to shut down the airport in protest at the impact of air travel - part of the global Extinction Rebellion demonstrations.

Protesters say airport expansion plans are incompatible with the government's commitment to cut emissions to net-zero by 2050.

Activists are beginning what they call a three-day "Hong Kong-style occupation of the terminal building" and say they want to stop flights by lying, sitting or gluing themselves in front of departure and arrival gates.

In a separate incident, a plane returned to the terminal after another protester disrupted the flight, according to Sky sources.














How far are climate change protesters prepared to go?

00:00

33:07

1900 episodes

656 hours, 51 minutes

		 <b>Featured</b>	How far are climate change protesters pr...		33:07
			King's speech: What are Labour's key plans?		23:06
			JD Vance: Who is Trump's running mate?		23:12
			Trump, Biden and a divided States		19:43

:: Listen to the Daily podcast on [Apple Podcasts](#), [Google Podcasts](#), [Spotify](#), [Spreaker](#)

Footage shared by a Twitter user showed a protester refusing to take his seat on a Dublin-bound flight.

He can be heard telling an air hostess: "I don't wish to travel with you but I don't wish to get off."

He adds: "I'm extremely sorry for the inconvenience."

A passenger is then heard saying to the cabin crew: "Can you do us all a favour and remove him from the plane?"



Police removed another protester from a plane on the runway. Pic: Warren Swalbe



'We have two generations left': Climate protester halts take-off

The protester continues: "We have two generations of human civilisation left if we carry on doing what we're doing."

Extinction Rebellion said it intended to "peacefully occupy and shut down" the airport's terminal building.

### YouTube

This content is provided by YouTube, which may be using cookies and other technologies. To show you this content, we need your permission to use cookies. You can use the buttons below to amend your preferences to enable YouTube cookies or to allow those cookies just once. You can change your settings at any time via the [Privacy Options](#).

Enable Cookies

Allow Cookies Once

Sky's home affairs correspondent Mark White said a protester also managed to get onto a low roof in the terminal building.

Outside the airport, protesters blocked traffic near the drop-off zone, while police also dealt with demonstrators who occupied the Docklands Light Railway station, gluing themselves to the entrance.



X

This content is provided by X, which may be using cookies and other technologies. To show you this content, we need your permission to use cookies. You can use the buttons below to amend your preferences to enable X cookies or to allow those cookies just once. You can change your settings at any time via the [Privacy Options](#).

Enable Cookies

Allow Cookies Once

Extinction Rebellion spokesperson Rupert Read said: "By non-violently shutting down this airport, in homage to the style of the Hong Kong democracy protesters, we are demonstrating the utter frailty of the transport systems that countries such as ours, unwisely, have come to depend upon."

The group said hundreds had signed up to take part and that they were willing to risk being arrested.



HB-144



A protester is carried away by police after being arrested



An arrested demonstrator smiles as he is carried away

Metropolitan Police deputy assistant commissioner Laurence Taylor said there were plans to intervene and "deal proactively" with anyone trying to disrupt the airport.

London City Airport CEO Robert Sinclair said only two flights had been cancelled, and the airport had "remained fully operational throughout the day".

He added: "If you are flying from London City Airport this evening or tomorrow, please do check the status of your flight with your airline before travelling to the airport."



Protest organisers say people are willing to be arrested for their cause

The sit-in comes on the fourth day of the Extinction Rebellion [climate protests](#), which are taking place across central London and other cities worldwide.

Hundreds of officers are being drafted in from [across England and Wales](#) to help the Met with the demonstrations.

More than 1,000 people have been arrested.

#### Related Topics

[Extinction Rebellion](#)

[Climate Change](#)

#### Sponsored Links

|

**From:** [Jonathan Kalman](#)  
**To:** [Belen Llamas](#)  
**Subject:** Fwd: Just Stop Oil/Fossil Free London Protest - 27/07/2024  
**Date:** 15 July 2024 14:07:41

---

Sent from [Outlook for Android](#)

---

**From:** Neil Harvey <neil.harvey@gatwickairport.com>  
**Sent:** Monday, July 15, 2024 2:04:13 PM  
**To:** Jonathan Kalman <jonathan.kalman@gatwickairport.com>  
**Subject:** FW: Just Stop Oil/Fossil Free London Protest - 27/07/2024

FYI

---

**From:** Lillywhite, Darren CL517 <darren.lillywhite@sussex.police.uk>  
**Sent:** Monday, July 15, 2024 9:27 AM  
**To:** Neil Harvey <neil.harvey@gatwickairport.com>; Andrew Murray <andrew.murray@gatwickairport.com>; Aaron Bassett <aaron.bassett@gatwickairport.com>; Luke Mosley <Luke.Mosley@gatwickairport.com>; DD - IOM Incident Operations Manager <iom@gatwickairport.com>; DD - SOM Security Operations Manager <SOM@gatwickairport.com>  
**Cc:** Burtenshaw, Justin CB881 <Justin.burtenshaw@sussex.police.uk>; Godley, Sarah DG594 <Sarah.Godley@sussex.police.uk>; Richard Church (GATPOL) <richard.church@sussex.police.uk>  
**Subject:** [EXTERNAL SENDER] Just Stop Oil/Fossil Free London Protest - 27/07/2024

**CYBER AWARE - Caution, this is an external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments**

---

Gatwick Colleagues,

Just to let you know that we have been advised of a potential protest in London on Saturday 27<sup>th</sup> July.

It appears to be a protest organised by JSO and Fossil Free London. The current protest is being advertised as taking place at the Department for Transport offices in London. JSO had already given the new government until 12<sup>th</sup> July to issue statements about movement away from fossil fuels in their policies.

I have been informed that the protest was originally due to take place at London City Airport, but the obtaining of an injunction at that location has led to the change of protest location, to a site with no injunction. It appears that the protestors may have a reduced appetite for risk if the site has an injunction. This may be a consideration in your own local discussions about tactics.

At this time there is no additional intelligence to suggest that there will be secondary protests but if there are protests in London, protestors may well be travelling through Gatwick on the train or arriving from elsewhere in Europe, by plane to attend the protest. There has been intelligence suggesting that UK climate protestors were asking for support from European colleagues for activity at the end of July, and we did see the Amsterdam airport protests last

week.

Regards

Darren

Darren Lillywhite  
Detective Inspector

Gatwick Operations CID & Intelligence  
Gatwick Police Station  
Perimeter Road North  
Gatwick  
West Sussex  
RH6 0JE

[Tel: 01273 404535](tel:01273404535) Ext 537233

Mobile: 07768 774092

Email : [darren.lillywhite@sussex.police.uk](mailto:darren.lillywhite@sussex.police.uk)

You can report crime and incidents online at

<https://www.sussex.police.uk/report-online>

We want to know your views - see what's new and give us your feedback and suggestions at [www.sussex.police.uk](http://www.sussex.police.uk)

If you have received this message in error, please contact the sender as soon as possible - you may not copy it, or make use of any information contained in it for any purpose, or disclose its contents to any other person. Messages sent and received by Sussex Police are not private and may be the subject of monitoring.



Party: C  
Name: J Pollock  
Exhibit: JP  
Date: 18 July 2024  
Number: 1  
**Claim No: [...]**

**IN THE HIGH COURT OF JUSTICE**

**KING'S BENCH DIVISION**

B E T W E E N:-

**GATWICK AIRPORT LIMITED**

Claimant

-and-

**PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON GATWICK AIRPORT (AS SHOWN FOR IDENTIFICATION OUTLINED IN YELLOW AND SHADED YELLOW AND BLUE ON THE PLAN 1 ATTACHED TO THE PARTICULARS OF CLAIM**

Defendant

---

**WITNESS STATEMENT OF JULIAN POLLOCK**

---

**I, JULIAN POLLOCK**, of Herbert Smith Freehills LLP, Exchange House, Primrose Street, London EC2A 2EG **WILL SAY** as follows:

1. I am a partner in the firm of Herbert Smith Freehills LLP and I have conduct of this matter on behalf of the Claimant along with my partner Matthew Bonye.



2. I make this witness statement in support of the Claimant's application for an injunction to prevent protesters from trespassing and/or causing a public or private nuisance at London Gatwick Airport (as defined in the Particulars of Claim). I am authorised by the Claimant to give this witness statement on its behalf.
3. I have read the Particulars of Claim and the witness statement of Neil Harvey for the Claimant. I adopt the definitions in the Particulars of Claim.
4. Where the facts referred to in this witness statement are within my own knowledge, they are true. Where the facts are not within my own knowledge, I believe them to be true and I have provided the source of my information.
5. I refer to the exhibit marked **JP1** in this statement, which is 48 pages. They have been produced to me and I verify that the documents in those exhibits are true copies of the documents. References in this witness statement to the page numbers in **JP1** are marked "**JPx**".

#### **Titles and Third Party Areas**

6. There is now produced to me and shown to me at page **JP2** of the exhibit marked JP1 a plan which shows the extent of the Claimant's registered titles at HM Land Registry and the extent of the proposed injunction ("**Plan 1**"). The land shown shaded yellow and shaded blue on Plan 1 shows the extent of the footprint of London Gatwick Airport. HB-163
7. Part A of the Title Schedule to the Particulars of Claim comprises a table which lists the registered titles at HM Land Registry which are owned either freehold or leasehold by the Claimant. Plan 2 included in the exhibit marked **JP3** shows the freehold titles owned by the Claimant edged in red and the leasehold titles owned by the Claimant edged in blue. The outline of London Gatwick Airport on Plan 2 is identical to the outline of the yellow and blue shaded areas on Plan 1. HB-164
8. Some of the registered titles listed in Part A of the Title Schedule to the Particulars of Claim are subject to intragroup lease and lease back arrangements put in place by the Claimant in 2015 (the "**Leaseback Arrangements**"). The Claimant granted long leases of various parts of London Gatwick Airport to Ivy Bidco Limited (Co Regn. No. 06879093) for a term of 250 years. Ivy Bidco Limited is a group company of the Claimant. Ivy Bidco Limited leased back such areas to the Claimant for a term of 100 years. The registered titles held by Ivy Bidco Limited and the Claimant pursuant to the Leaseback Arrangements are set out in the table annexed to the Particulars of Claim. Subject to paragraph 11.4 below, the Claimant therefore has an immediate right to possession of these areas.



9. Copies of the registered titles and title plans for London Gatwick Airport are included in a separate bundle that will be available at the hearing.
10. The edges of the yellow and blue shaded areas on Plan 1 generally follow the boundary features of London Gatwick Airport, which is generally surrounded by a perimeter fence/hedgerows/gates (with gaps for entrances and exits).
11. I am informed by Jonathan Kalman (a solicitor employed by Gatwick Airport Limited) that to the best of his knowledge:
  - 11.1 London Gatwick Airport comprises 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, taxiways, fuel facilities, management / airline facilities, offices, cargo facilities, hangars and hotels. London Gatwick Airport also has a railway station (which is not on land owned or occupied by the Claimant).
  - 11.2 Some of those facilities (including for example the cargo area and retail areas in the main terminal buildings) are situated on land which is the subject of leases or other occupational arrangements including licences (the "**Third Party Areas**").
  - 11.3 Given the large number of Third Party Areas and their locations throughout London Gatwick Airport and the urgency of the application for injunction, it is not proportionate or practicable to show the Third Party Areas by reference to a plan or to list them.
  - 11.4 The Claimant does not have an immediate right to legal possession or control of the Third Party Areas.
12. A colleague at Herbert Smith Freehills LLP prepared Plan 3 using Orbital Witness. The Orbital Witness software allows publicly available information in respect of highways to be mapped on to plans. Plan 3 **[JP4]** shows areas of highway maintained at public expense within the boundaries of London Gatwick Airport. It was not possible in the time available and given the urgency of the application to apply for a full highways search, which can take several weeks to come back. The Claimant (via my firm) also carried out a local authority search in 2018, and there was nothing in that search result to suggest then that there were any areas of public highway within London Gatwick Airport, and in any event I have been informed by Jonathan Kalman that as far as he is aware the Claimant maintains and manages the roads within London Gatwick Airport, and they are not maintained (nor as far as he is aware, maintainable) at public expense. In any event, the roads within London Gatwick Airport are on the Claimant's private land.

HB-165

### Environmental protests at oil terminals

13. Early in 2022, Just Stop Oil, Extinction Rebellion and Youth Climate Swarm announced a campaign to target oil and gas infrastructure.
14. Direct action occurred in March-April 2022 following the announcement. By way of example only:
  - 14.1.1 the Kingsbury Terminal in Staffordshire (operated by, amongst others, Valero Energy Limited) was the subject of particularly aggressive direct action by anti-fossil fuel protestors which prompted Valero Energy Limited (and 2 of its group companies) to seek an injunction to restrain acts of trespass and nuisance on their oil refinery and oil terminals;
  - 14.1.2 four of Esso's oil terminals were targeted including West London, Hythe, Purfleet and Birmingham; and
  - 14.1.3 the Buncefield oil terminal was the subject of direct action.
- 14.2 The evidence relied upon by the Claimant in the Valero case included a Witness Statement from Benjamin Smith (Assistant Chief Constable for Warwickshire Police) dated 10 April 2022.
- 14.3 Mr Smith's Witness Statement refers to serious incidents involving obstruction of access to and from the Kingsbury Terminal (using a variety of tactics including individuals climbing on to the top of oil tankers, gluing themselves to road surfaces and using "lock-on" devices). He also refers to more than 500 arrests having been made between 31 March and 10 April 2022:

Date	Arrests
31 March – 1 April	42
2 April – 3 April	68
5 April	88
7 April	127
9 – 10 April	180

- 14.4 Mr Smith's Witness Statement includes the following text below a heading "Police Operation":

*The scale and duration of the policing operation has been one of the most significant that I have experienced in my career. Large numbers of officers, drawn from right across the force, have been deployed to Kingsbury day and night since the 1st April. This has meant that we have had to scale down some non-emergency policing services, including those that serve North Warwickshire. Although core policing services have been effectively maintained across the County during this period, the protests have undoubtedly impacted on the quality and level of the policing service that we are able to deliver. Officers who may have ordinarily been policing the communities of North Warwickshire have had to be redeployed to support the policing operation linked to Kingsbury. It has also meant that we have had to bring in additional officers from other regional forces, in addition to more specialist teams such as working at heights teams and protest removal teams. All of these will come at significant additional cost to the force and ultimately the public of Warwickshire.*

- 14.5 Mr Smith's Witness Statement includes the following text below a heading "Community Impact":

*The impact on the local community has been substantial. There have been almost daily road closures of the roads around the oil terminal which has created disruption and inconvenience. The M42 has also been disrupted on occasions as a result of the protest activity. There has been a significant policing presence since the 1st April which I am sure has created a level of fear and anxiety for the local community. The policing operation has also extended into unsociable hours with regular essential use of the police helicopter overnight disrupting sleep. The reckless actions of the protestor has also created increased risk of potential fire or explosion at the site which would likely have catastrophic implications for the local community including the risk of widespread pollution of both the ground, waterways and air. Finally, the actions of the protestors has impacted the supply of fuel to petrol forecourts in the region, leading to some shortages, impacting upon not only local residents but the broader West Midlands region.*

- 14.6 A copy of Assistant Chief Constable Benjamin Smith's witness statement is now produced and shown to me marked **JP5**.

HB-166

- 14.7 Although Valero was the first major oil company to seek an injunction (as Kingsbury Terminal was the first to be targeted by JSO), most of the other major oil companies followed their example:

Valero Energy Ltd Valero Logistics UK Ltd Valero Pembrokeshire Oil Terminal Ltd	QB-2022-000904
Esso Petroleum Company Ltd ExxonMobil Chemical Ltd	QB-2022-001098
Essar Oil (UK) Ltd Stanlow Terminals Ltd Infranorth Ltd	PT-2022-000326
Navigator Terminals Thames BV Ltd Navigator Terminals Seal Sands Ltd Navigator Terminals North Tees Ltd Navigator Terminals Windmill Ltd	QB-2022-01139
Exolum Pipeline Systems Ltd	QB-2022-001142
Shell International Petroleum Company Ltd	QB-2022-001259
Shell U.K. Ltd	QB-2022-001241
Shell U.K. Oil Products Ltd	QB-2022-001420

- 14.8 The general consensus has been that the injunctions have proved to be an effective deterrent against unlawful acts of trespass and nuisance. This appears to have been confirmed by Just Stop Oil itself. In response to a comment from a member of the public on Twitter (now formally known as “X”) suggesting that protests ought to be carried out at oil refineries, JSO tweeted on 9 June 2023:


*Do you know what happens if you protest outside oil refineries now? Oil companies have brought injunctions to ban people from taking action at refineries, distribution hubs, even petrol stations. Punishments for breaking injunctions range from unlimited fines to imprisonments.*


- 14.9 Most of the injunctions referred to in the table above have been extended and remain in force (typically for 5 years but on terms which provide for an annual review by the High Court) and they continue to be an effective deterrent. I am not aware of any applications to commit individuals for breach of them.
- 14.10 North Warwickshire Borough Council also obtained an injunction to restrain protestors from obstructing highways in the vicinity of Kingsbury Terminal (QB-2022-001236). This injunction also remains in place, although a trial was heard in June 2024 with judgment reserved.
- 14.11 Thurrock Council and Essex County Council obtained an injunction to restrain protestors from obstructing roads in the vicinity of Navigator Terminals in West Thurrock, the Esso Fuel Terminal in Purfleet and the Exolum Fuel Terminal at Grays (QB-2022-001317). Again this injunction remains in place with a trial listed on 9 October 2024.
- 14.12 In November 2022, National Highways Ltd sought an injunction to restrain trespass on gantries and other structures over, under or adjacent to the M25 motorway (QB-2022-

00433). Although this injunction has lapsed, I understand from the Order of Mrs Justice Collins-Rice dated 26 April 2024, that the conduct which was restrained by that particular injunction is covered by a wider injunction (extending to the M25, M25 feeder roads and Kent roads) which National Highways Ltd obtained in separate proceedings (QB-2021-003737) in 2021 (as a response to protests conducted by Insulate Britain).

14.13 On 13 September 2023, JSO posted on X in the following terms:

*Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that make protests impossible at oil refineries, oil depots and even petrol stations.*

 *Our government issued 100 new oil and gas licences, confirming their disregard of human life. This is a last ditch attempt to stop our corrupt government taking more lives.*

 *They know new oil and gas is genocide – take action now at <http://juststopoil.org>*

14.14 The post on X featured a video in which JSO protestors were seen protesting along a highway. The URL for the post on X is:

[https://x.com/JustStop\\_Oil/status/1701903086057386177](https://x.com/JustStop_Oil/status/1701903086057386177).

### Other Airport Injunctions

15. I refer to the witness statement of Neil Harvey, the Head of Operations at London Gatwick Airport, which I have seen as a final draft and which sets out (among other things) the details of the threats made to airports by protest groups such as Just Stop Oil and recent incidents of actual and attempted disruption and trespass by protesters in Munich, at London Stansted Airport and London Gatwick Airport.

16. I am aware of three other injunctions which have been granted to prevent protestors accessing land operated as airports:

16.1 On 20 June 2024, Mr Justice Julian Knowles granted a “without notice” injunction in favour of London City Airport based on the threat from JSO (QB-2024-001765). A copy of that Order and a Note of the Hearing is attached to this witness statement marked **JP10**.

HB-171 - HB-191

16.2 On 5 July, Her Honour Judge Coe K.C. granted a “without notice” injunction in favour of Manchester Airport, Stansted Airport and East Midlands Airport based on the threat from

JSO and Extinction Rebellion (KB-2024-002132). A copy of that Order and a Note of the Hearing is attached to this witness statement marked JP35.

HB-196 - HB-212

- 16.3 On 9 July 2024, Mr Justice Julian Knowles granted a “without notice” injunction in favour of Heathrow Airport based on the threat from JSO (KB-2024-002210). A copy of that order and a Note of the Hearing is attached to this witness statement marked JP40.

HB-213 - HB-233

17. The size and prominence of London Gatwick Airport makes it a likely target of similar real and present threats of disruptive environmental protests this year and that injunctions of this nature will assist in protecting these airports. I believe the fact that London Gatwick Airport is now one of the few large airports in the UK without a similar injunction is likely to heighten the risk of protesters with an agenda to disrupt airports this summer to target London Gatwick Airport.

### **Proceeding against Persons Unknown**

18. The Claimant does not know the identities of the individuals who have already attempted to protest at London Gatwick Airport. In any event, as Neil Harvey explains in his witness statement, those people (along with any others whose names the Claimant knows because they have already carried out a protest on an airport site) have already been arrested and charged.
19. The Claimant does not know which particular protest groups (or persons within those groups) are likely to attempt to enter London Gatwick Airport on any specific day, nor would it be appropriate for it to name only individuals who happened to have engaged in similar protests in the past.
20. The Claimant has therefore brought these proceedings against persons unknown who intend to trespass and/or cause a public or private nuisance at London Gatwick Airport ("**Persons Unknown**"). It does so now, conscious that groups such as Just Stop Oil have threatened and have disrupted airports in 2024, increasing the likelihood that such activity will occur at London Gatwick Airport.

### **Advertisement**

21. The Claimant has decided to make this application for an injunction without beforehand notifying Persons Unknown (by the methods proposed in the section below). It is appreciated that this is an exceptional step but the Claimant believes there are compelling reasons for doing so:



- 21.1 the Claimant is concerned that if Persons Unknown are notified in the usual way, London Gatwick Airport will be deliberately targeted and direct action will take place before an injunction is in place. This would defeat the very purpose of the injunction; and
- 21.2 the potential for direct action is of serious concern to the Claimant for the reasons set out in the Witness Statement of Neil Harvey. In particular, London Gatwick Airport is worried about the security, health and safety risks posed by direct action that may take place on runways and airplanes, the risk of disruption to its customers and cargo transportation and the risk of financial loss. If notice of this claim and application were to accelerate the carrying out of direct action at London Gatwick Airport, it would give rise to the exact risks the Claimant was intending to prevent.

### **Alternative Service/Notification**

22. The Claimant proposes to take the following steps to bring the claim form, application notice, witness evidence and any order made by the Court to the attention of Persons Unknown by:
- 22.1 Uploading the documents to Gatwick Airport Limited's website, url [www.gatwickairport.com/injunction.html](http://www.gatwickairport.com/injunction.html).
- 22.2 Affixing warning notices in each of the locations at regular intervals around the perimeter fence and at suitable entrances/exits:
- 22.2.1 the proceedings;
- 22.2.2 the fact that an injunction is now in place covering London Gatwick Airport;
- 22.2.3 the fact that the court documents:-
- (A) may be viewed on the relevant website (and providing the relevant URL);
- (B) the fact that copies of the court documents may be obtained from the Claimant's solicitors and providing the relevant contact details;
23. Sending an email message providing the same information as that contained in the warning notices to Just Stop Oil's general and press enquiries inboxes ([info@juststopoil.org](mailto:info@juststopoil.org) and [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)) and to Extinction Rebellion's email address ([enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk));
24. A draft of the warning notice will be available at the hearing for the Court.
25. By taking these steps, the Claimant believes the proceedings, the application notice and the Order will come to the attention of Persons Unknown. These are the steps which the Court

ordered be taken to bring the documents to the attention of Persons Unknown in the other airports injunctions I refer to above.

**Full and frank**

26. As this is a without notice injunction, I am aware that the Claimant has to give full and frank disclosure and I confirm that the Claimant has given full and frank disclosure of all facts, matters and arguments which, after reasonable research, they are aware or could with reasonable diligence ascertain and which might affect the decision of the Court on whether to grant the order or the terms of the order it is prepared to make.
27. It might be said that the conduct the Claimant is concerned about and which they seek to prohibit by the injunction sought is a criminal offence under the byelaws for London Gatwick Airport, set out in the witness statement of Neil Harvey, and section 64 of the Airports Act 1986 and/or could be prosecuted under the Public Order Act 2023.
28. Despite that being the case, the Claimant seeks an interim injunction for the following reasons:
29. It appears, from other cases, that interim injunctions have proved to be a more effective deterrent against direct action than the possibility of protestors being charged with criminal offences:
- 29.1 As set out above, police arrested over 500 people in connection with the protests at the Kingsbury Terminal between 31 March 2022 and 10 April 2022. The dates on which those arrests occurred, as shown in paragraph 14.3 above, indicates that protestors were not

deterred by arrests having happened on earlier dates; in fact, the table suggests that instead as time went on the protests started to increase in size.

29.2 I am aware from the summary judgment decision of Ritchie J in *Valero Energy Ltd v Persons Unknown* [2024] EWHC 134 (KB) that:

29.2.1 The first injunction was granted to Valero in late March 2022, restricting access to 8 sites including the Kingsbury site.

29.2.2 Despite that, between 1 April and 7 April 2022 and 9 and 15 April 2022, protestors attended the Kingsbury Terminal.

29.2.3 The protestors also targeted other owners' sites.

29.2.4 On 11 April 2022, the interim injunction was replaced by an order of Bennathan J.

29.2.5 The evidence in support of the final injunction included evidence that the interim injunctions in combination with those obtained by Warwickshire Borough Council had significantly reduced protest at the Kingsbury site (see [39]) and that, since June 2023, JSO had carried out their protests on different sites (see [40]), although I do note there were 9 dates on which protests had occurred at sites covered by the injunction in April 2022, May 2022, August 2022 and September 2022 (see [29]).

29.2.6 The significant reduction in protest activity at a site following an interim injunction being obtained appears to have also occurred in other cases. For example, as was set out in Hill J's decision in *Shell UK Ltd v Persons Unknown* [2023] EWHC 1229 (KB) at [31], there was evidence that the injunction of Bennathan J in respect of Shell Centre Tower had had a strong deterrent effect as there were no incidences of unlawful activity following it. However, corporate buildings had been the target of unlawful activity since the injunction was made. That is also supported by JSO's own comments on X on 13 September 2023.

29.2.7 From the cases where interim injunctions have been granted and then later reviewed, there seems to be a pattern of behaviour where the interim injunctions against protestors result in protests ceasing entirely or reducing significantly at the location subject to the injunction and the protestors moving to other sites.

29.2.8 On the other hand, any offence committed under section 63 of the Airports Act 1986 by a breach of the byelaws would be punishable only by a fine with the

maximum fine being £2,500 by virtue of section 64(2) of the Airports Act 1986 and section 122(1) of the Sentencing Act 2020.

- 29.3 In addition, any enforcement of the byelaws by way of criminal proceedings (1) could occur only after the protests had occurred; and (2) would likely take some time to come to a final decision; and (3) would be punishable only by a fine with the maximum fine being £2,500 by virtue of section 64(2) of the Airports Act 1986 and section 122(1) of the Sentencing Act 2020. For the reasons set out in Mr Harvey's witness statement, any protests at the airports have the potential to produce significant adverse consequences, security risks and could be potentially dangerous. Delayed prosecutions after the protests have occurred will not prevent the harm, that the Claimant is concerned about, from occurring.
- 29.4 The same is true for the offence under section 68 of the Criminal Justice and Public Order Act 1994 and any Public Order Act 2023 offences, although the offences under section 68 of the 1994 Act and of locking on under section 1 of the 2003 Act carry the potential of a custodial sentence for up to six months or a fine, and the offence of interfering with national infrastructure under section 7 of the 2003 Act carries a maximum of a 12 month sentence (if tried in the Crown Court). Mr Harvey's witness statement has set out that the Stansted airport protestors have been charged with offences under section 68 of the Criminal Justice and Public Order Act 1994 and under section 7 of the Public Order Act 2023 (as well as criminal damage). The risk of that did not seem to deter them from the direct action on 20 June 2024 and their arrests and charges do not appear, from the comments made to the press after direct action and the meeting on 27 June 2024, to have deterred Just Stop Oil generally.
30. In addition, an article dated 6 October 2023, which was published originally on the Daily Mail online, stated that Just Stop Oil protestors compete to see who can get arrested on the most occasions "in a bid to win prizes". A copy of this story is attached to this witness statement marked "JP31".


HB-192

### **Undertaking in Damages**

31. I cannot think of a situation where someone affected by the injunction could suffer loss or damage as a result of it. I am nonetheless authorised on behalf of the Claimant to provide the necessary cross-undertaking to pay any sum that the Court considers appropriate to compensate the Defendants for any loss if it is subsequently determined that the Claimant is not entitled to the order which they seek.
32. The Claimant's company accounts filed on 13 April 2024 show a profit for the financial year ending 31 December 2023 of £186.3 million (following a profit of 2022 of £93.1 million), net assets of £213.7 million and net current assets of £-180.8 million.

**STATEMENT OF TRUTH**

I believe 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:  .....

**JULIAN H POLLOCK**

Date: .....18 July 2024.....

Claim No: [...]

**IN THE HIGH COURT OF JUSTICE**

**KING'S BENCH DIVISION**

B E T W E E N:-

**GATWICK AIRPORT LIMITED**

Claimant

-and-

**PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON GATWICK AIRPORT (AS SHOWN FOR IDENTIFICATION OUTLINED IN YELLOW AND SHADED YELLOW AND BLUE ON THE PLAN 1 ATTACHED TO THE PARTICULARS OF CLAIM**

Defendant

---

**EXHIBIT JP1**

---

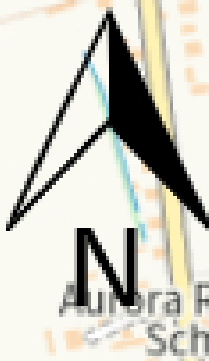
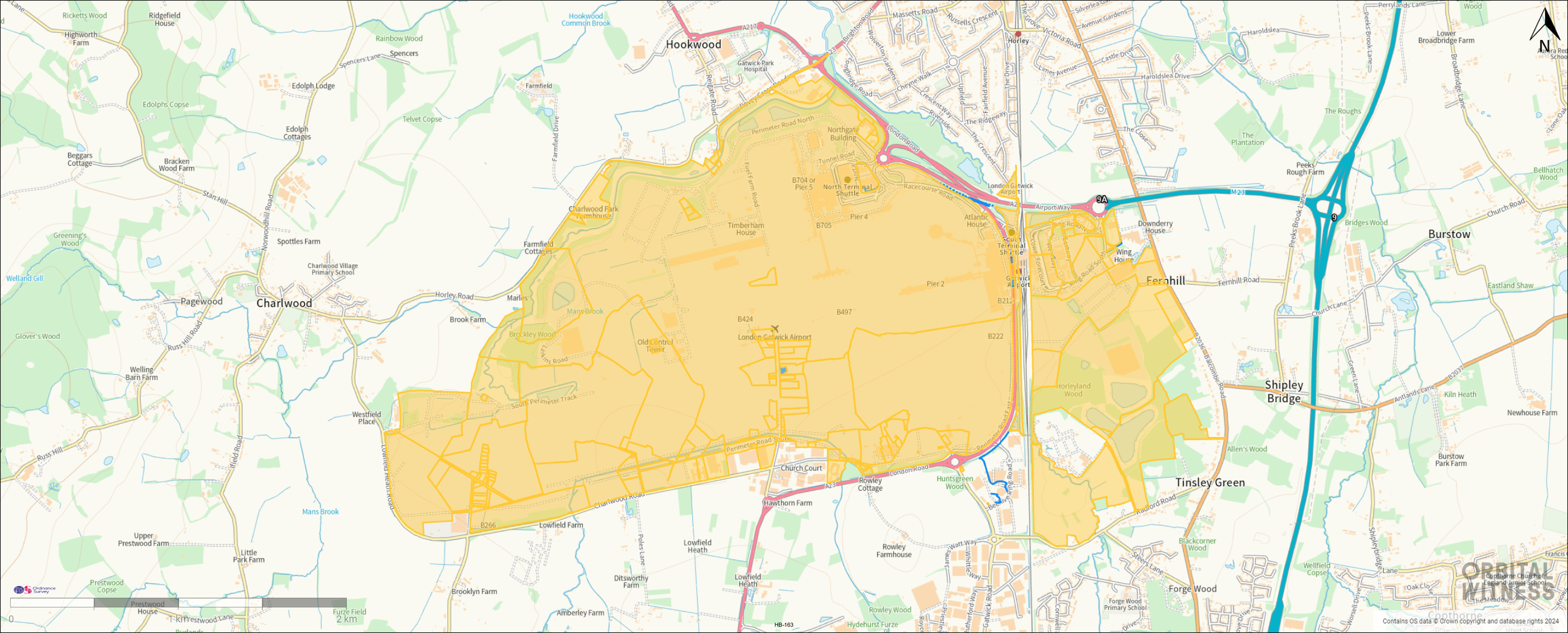
This is Exhibit "JP1" referred to in the First Witness Statement of Julian Pollock dated 18 July 2024

Signed:.....  


**JULIAN POLLOCK**

Date: 18 July 2024

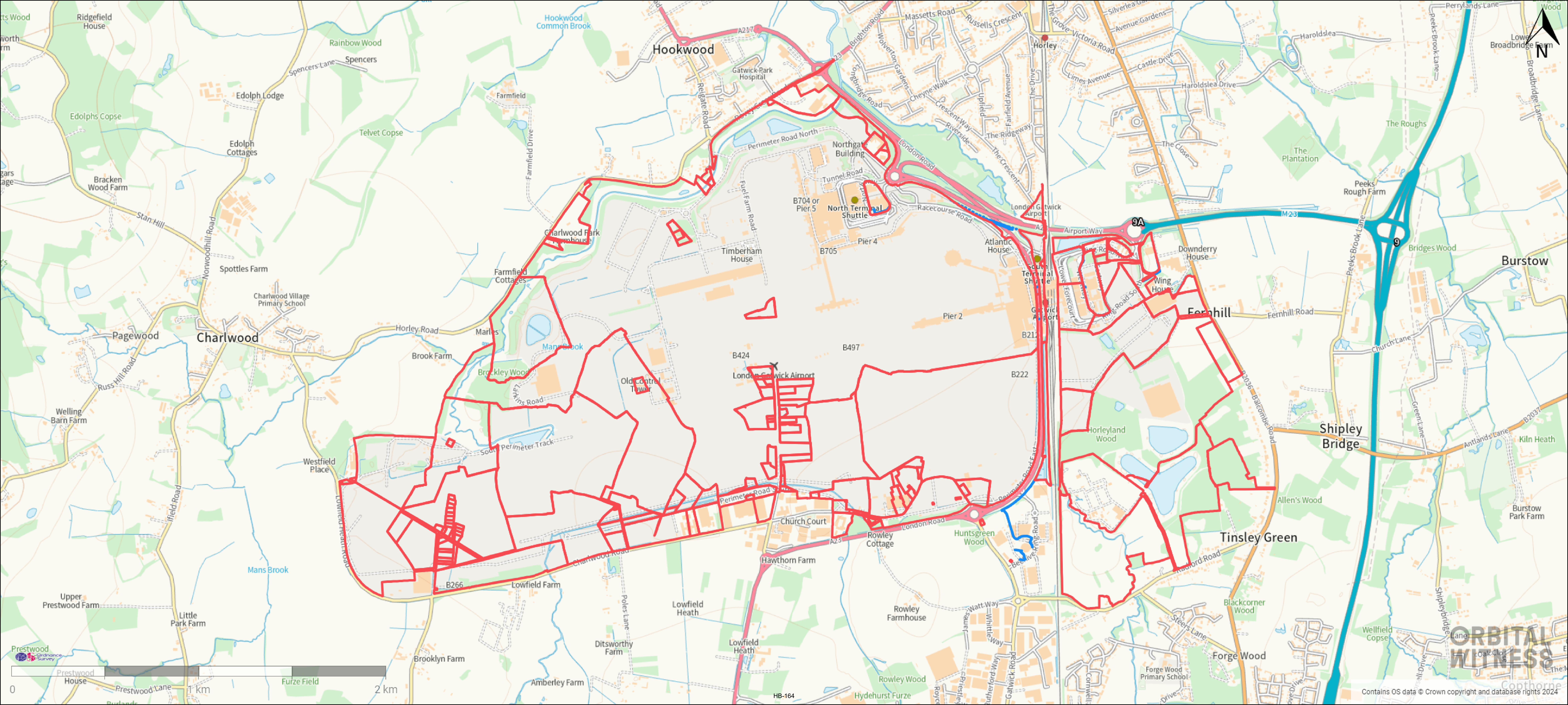




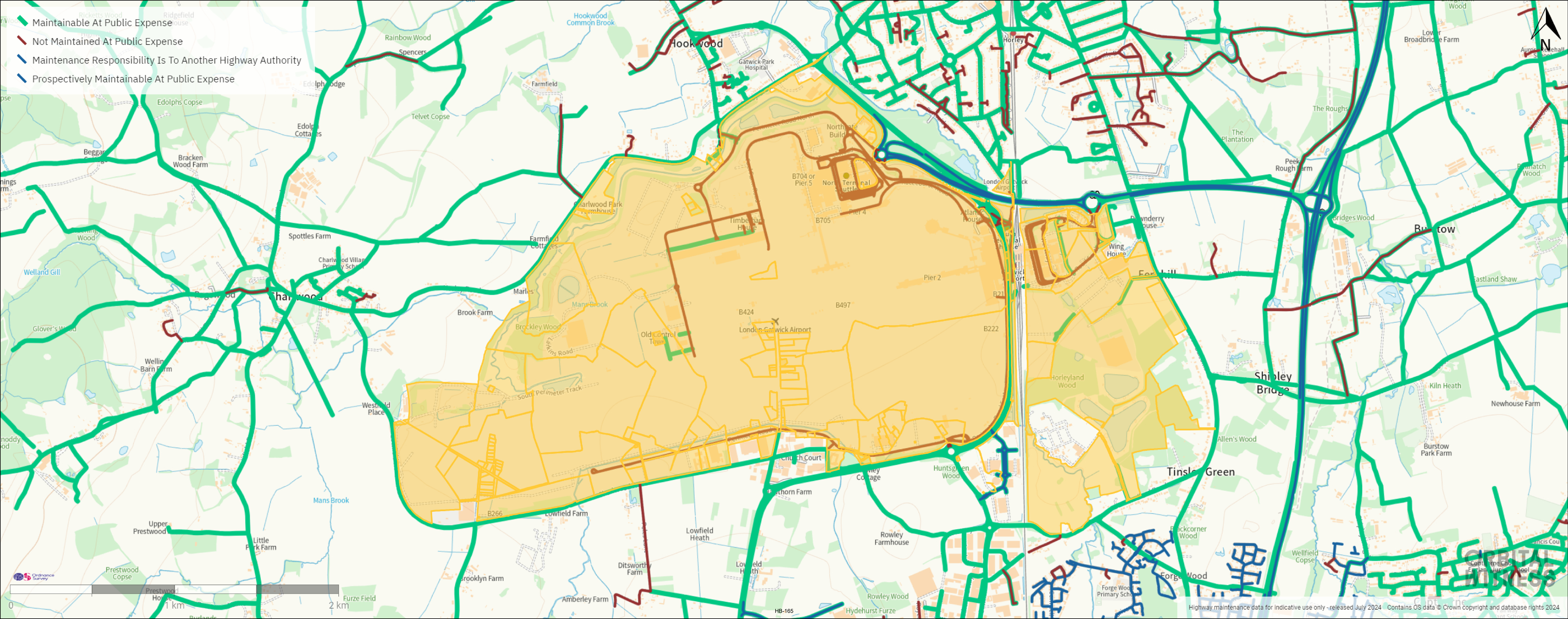
Contains OS data © Crown copyright and database rights 2024

**ORBITAL WITNESS**  
Cothorne Church  
England Junior School  
The Meadow











RESTRICTED (when complete)

Page 1 of 5

**WITNESS STATEMENT**

(Criminal Procedure Rules, r27.2; Criminal Justice Act 1967, s.9; Magistrates' Courts Act 1980, s.5B)

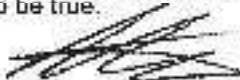
URN: 

Statement of: Benjamin David Smith

Age if under 18: 0/18

Occupation: T/Assistant Chief Constable

This statement (consisting of 5 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I may be required to attend court and that I shall be liable to prosecution if I have wilfully stated anything in it, which I know to be false, or do not believe to be true.

Signature:  ACC 1618

Date: 10/04/22

I am the above named person and have worked as a police officer for Warwickshire Police for the last 18 years. I am currently Temporary Assistant Chief Constable with responsibility for Local Policing, but I am also Gold Commander, and the senior policing lead, for the response to protest activity linked to the Kingsbury Oil Terminal. Warwickshire Police, in terms of forces nationally, is a relatively small force. It has 1050 officers currently policing a population 570,000 people spread across an area just under 2,000 sq km.

Prior to 1<sup>st</sup> April 2022, I had received a number of briefings on Just Stop Oil, who are a protest group and describe themselves as a coalition of groups working together to ensure the Government commits to halting new fossil fuel licensing and production.

In responding to protest, the police have two main duties; to not prevent, hinder or restrict peaceful protest; and in certain circumstances, take reasonable steps to protect those who want to exercise their rights peacefully.

As Gold for the operation I wrote a strategy with the overall aim being:

**to provide an impartial and proportionate policing response to protests in relation to the lawful activities at Kingsbury Oil Terminal, protecting life and minimising the risk of harm to all those connected to it.**

Although plans were made to police potential protest activity linked to Just Stop Oil, the scale and frequency of the activity that has been experienced over the last 10 days has created a real challenge for the force and indeed UK policing. In addition it is important to make clear that although policing has a duty to protect the rights of those who wish to protest peacefully, the Just Stop Oil protest activity has not been peaceful or lawful. The group has engaged in direct unlawful action to prevent the lawful activity of the oil depot and its distribution partners.

At the time of writing there have been 180 arrests in Warwickshire alone.

I will now provide a summary of the protest activity the force has dealt with since 1<sup>st</sup> April.

Signature:  ACC 1618

Signature witnessed by:

2017

Ben Smith/04/22

RESTRICTED (when complete)

Page 2 of 5

Statement of Benjamin David Smith

URN: 31<sup>st</sup> March – 1<sup>st</sup> April

Approximately 40 protestors attended the site at Kingsbury in possession of various devices to lock on to each other, vehicles or infrastructure. They were also in possession of glue to glue themselves to the carriageway. The protestors stopped and then climbed on oil tankers, glued themselves to the road and sat in the main entrance roadway. Distribution operations at the site were suspended and a significant police operation was instigated. 42 arrests were made and distribution operations at the site recommenced at 2030hrs.

2<sup>nd</sup> April – 3<sup>rd</sup> April

At approximately 1930hrs, 40 protestors attended the Kingsbury site, blocking the main entrance. They glued themselves to the carriageway and locked onto each other. A number also climbed on top of oil tankers. Protest activity continued throughout the night and into 3<sup>rd</sup> April. Distribution Operations at the site were suspended and only partially re-opened at 1730hrs. Protestors remained at the site till 0000hrs before dispersing. Total arrest numbers at 68.

5<sup>th</sup> April

At 0730 hrs, 20 protestors attended the site and blocked the main entrance, again locking onto each other and gluing themselves to the carriageway. Operations at the depot were suspended, 10 arrests were made and the site was operational by 1100hrs.

A second wave of protestors attended the site at 1130hrs and targetted Junction 9 and Junction 10 of the M42, climbing onto oil tankers as they moved slowly off the slip roads. Operations at the depot were suspended and some tailbacks encroached onto the M42, creating risk to other road users. The protestors were removed and roads reopened at 1430hrs, with operations recommencing at the site. Total arrest numbers at 78.

7<sup>th</sup> April

At 0030 hrs, a small group of protestors approached the main entrance to the site and attempted to glue themselves to the carriageway. While police resources were distracted, 40 protestors approached across the fields to the rear of the site. They sawed through an exterior gate and scaled the fences to gain access to the oil terminal. Once on site, the protestors dispersed to a number of different locations including: the tops of three large fuel storage tanks containing unleaded petrol, diesel and fuel additives; two insecure cabs of fuel tankers locking themselves in with keys; the tops of two fuel tankers; onto the floating roof of another large fuel storage tank; into a half constructed fuel storage tank. They also used various lock on devices to secure themselves to the structures.

Signature: 

ACC 1648

Signature witnessed by:

2017

Ben Smith 04/22

RESTRICTED (when complete)

Page 3 of 5

Statement of: Benjamin David Smith

URN: 

An extremely complex and challenging policing operation was initiated, utilising a variety of specialist teams, working alongside staff from the oil terminal and the fire service. The site was cleared of protestors by approximately 1700hrs. Total arrest numbers at 127.

#### 9<sup>th</sup> April – 10<sup>th</sup> April

At 1050hrs, 4 protestors arrived at the main entrance and attempted to glue themselves to the carriageway. Three were arrested immediately. A short while later a male was arrested trying to abseil from a road bridge over Trinity Road to the north of the site, attempting to block the road. At 1530hrs, a caravan was deposited at the side of the road on Piccadilly Way, to the South of the site and 20 protestors glued themselves to the sides and top of the caravan. It was discovered that occupants within the caravan were attempting to dig, via a false floor, a tunnel under the road which would have blocked it for a considerable period. The caravan was forcibly entered at 0200hrs on the 10<sup>th</sup> April and 6 occupants arrested. An additional 22 were arrested from outside the caravan. Protestors continued to target the site on the 10<sup>th</sup> April, scaling tankers and gluing themselves to the carriageway. By the end of the day the total arrest numbers was at 180.

It is also important to note that Kingsbury has not experienced a constant level of peaceful or lawful protest. The protest activity has manifested as periods of high intensity, high volume and unlawful protest, followed by no protest over the next 24 hours. The activity has been highly coordinated, specifically targetted, and immediately unlawful in nature.

#### **Policing Operation**

The scale and duration of the policing operation has been one of the most significant that I have experienced in my career. Large numbers of officers, drawn from right across the force, have been deployed to Kingsbury day and night since the 1<sup>st</sup> April. This has meant that we have had to scale down some non-emergency policing services, including those that serve North Warwickshire. Although core policing services have been effectively maintained across the County during this period, the protests have undoubtedly impacted on the quality and level of the policing services that we are able to deliver. Officers who may have ordinarily been policing the communities of North Warwickshire, the road networks of North Warwickshire, or supporting victims of crime in North Warwickshire have had to be redeployed to support the policing operation linked to Kingsbury. It has also meant that we have had to bring in additional officers from other regional forces, in addition to more specialist teams such as working at heights teams and protest removal teams. All of these will come at significant additional cost to the force and ultimately the public of Warwickshire.

#### **Community Impact**

Signature: 

Acc 1618

Signature witnessed by:

2017

Ben Smith/04/22



RESTRICTED (when complete)

Page 4 of 6

Statement of: Benjamin David Smith


URN: 

The impact on the local community has been substantial. There have been almost daily road closures of the roads around the oil terminal which has created disruption and inconvenience. The M42 has also been disrupted on occasions as a result of the protest activity. There has been a significant policing presence since the 1<sup>st</sup> April which I am sure has created a level of fear and anxiety for the local community. The policing operation has also extended into unsociable hours, with regular essential use of the police helicopter overnight disrupting sleep. The reckless actions of the protestors has also created increased risk of potential fire or explosion at the site which would likely have catastrophic implications for the local community including the risk of widespread pollution of both the ground, waterways and air. Finally, the actions of the protestors has impacted the supply of fuel to petrol forecourts in the region leading to some shortages, impacting upon not only local residents but the broader West Midlands region.

### Investigation

A significant police investigation is underway to deal with all those protestors who have been arrested as part of the operation. Although large numbers of arrests have been made, the offences for which they can be arrested (obstruction of the highway etc) are generally low level and summary only offences which means the criminal justice options can be limited. We have also utilised bail conditions to try and prevent protestors returning to the site but these have largely proved to be unsuccessful with many of the protestors already being arrested multiple times from the Kingsbury site. Even when protestors breach their bail conditions, unless arrested for a further substantive offence, that are merely dealt with for the original offence for which they were arrested prior to the bail conditions being set. As stated, these are low level summary offences and therefore charge and remand in custody is not an option open to us. We have considered other potential options, including attempting to seek a threshold test charge on conspiracy offences on the evening of the 10<sup>th</sup> April. This did not meet the CPS bar, and therefore the detainees were bailed again with conditions. Other potential police powers have been considered but none that we are aware of would give us the weight of severity that would allow us to seek a charge and remand in custody. An Injunction would allow us to put the detainee immediately before a court to seek a remedy which may help to disrupt the enduring unlawful protest cycle that we currently find ourselves in.

Warwickshire Police would be fully supportive of this injunction as we consider that it would be expedient for the promotion or protection of the interests of the inhabitants of the local area. A power of arrest would allow my officers to deal with protestors effectively and robustly and then place them immediately before the court. We have considered all other options This may then provide some deterrent to the ongoing unlawful behaviour and may help to protect the local community from the tortuous ordeal that they are currently experiencing.

Signature:  A.C.1618

Signature witnessed by:

2017

Ben. Smith/04/22

RESTRICTED (when complete)

Page 5 of 5

Statement of: Benjamin David Smith

URN: 

I have grave concerns for public safety should the behaviour of the protestors continue in its current form. The Kingsbury site is an extremely hazardous site where the very presence of certain items and clothing on site is restricted because of the potential dangers of explosion or fire. The protestors have had no regard for their own or others safety with actions including the use of mobile phones on site (strictly prohibited), the scaling and locking on to very volatile fuel storage tanks, the tunnelling activity in close proximity to high pressure fuel pipes, and the forced stopping, and then scaling, of fuel tankers on the public highway. Not only does this cause unacceptable levels of risk to themselves and the public, it also puts my officers in significant danger as they have to attempt to remove them from the places they have decided to put themselves.

To support this application I have provided exhibit BDS1, which is a selection of Section 9 statements from my officers who have been at Kingsbury Oil Terminal and witnessed the protest activity first hand. I also exhibit BDS2, which are a number of video clips which illustrate the unlawful activity that the protestors are engaging in.

 ACC 1618Signature:  ACC 1618

2017

Signature witnessed by:

Ben Smith/C4/22

**IN THE HIGH COURT OF JUSTICE**

**KING'S BENCH DIVISION**

**B E T W E E N**

**(1) LONDON CITY AIRPORT LIMITED**

**(2) DOCKLANDS AVIATION GROUP LIMITED**

**Claimants**

**and**

**PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR  
OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT  
THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON  
CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE  
ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER  
DEFINED IN THE CLAIM FORM**

**Defendant**

---

**NOTE OF "WITHOUT NOTICE" HEARING BEFORE**

**MR JUSTICE JULIAN KNOWLES**

**20 June 2024**

---

The hearing commenced at 10:30.

Mr Justice Julian Knowles was familiar with the jurisdiction having granted the HS2 "route wide" injunction [2022] EWHC 2360 (KB) and the ESSO Southampton London Pipeline injunction [2023] EWHC 2013 (KB).

The Judge had read the hearing bundle and the Claimant's skeleton argument and he had received the authorities bundle.

YV introduced the papers and handed up reports of incidents at Stonehenge on 19.06.24 and at Stanstead Airport on 20.06.24.

The Judge acknowledged this material as evidencing that protests were starting to happen.

YV proposed a "route map" which followed his skeleton argument.

1. The airports campaign + the risk of harm
2. The Claimant's decision to apply "without notice"
3. The site
4. The draft Order
5. The relevant legal tests and
6. The Claimant's submissions
7. The Claimant's obligation to give full and frank disclosure

## **1. The airports campaign + the risk of harm**

YV referred to paras 4 – 12 of his skeleton argument.

YV noted that the October 2019 incident had been organised by Extinction Rebellion (not Just Stop Oil).

YV referred to:-

- the following paragraphs of Alison FitzGerald's w/s
  - 6-10 – the airport business;
  - 19-26 – the October 2019 incident at London City Airport;
  - 27-32 – health and safety issues;
  - 35 – the Met police;
- the photograph of James Brown having glued himself to the top of an aircraft at London City Airport in October 2019 at "AMF3" (HB/90); and
- the Daily Mail article dated 9 March 2024 (which broke news of the JSO's 2024 airports campaign) at "SSW5" (HB/257-263).

The Judge noted the unusual location of London City Airport being close to a city centre.

## **2. Without Notice**

YV referred to paras 13-16 of his skeleton argument.

Whilst the Judge acknowledged that CPR 25.3 and s.12 HRA 1998 may not technically apply, he suggested that those tests be addressed on a belts and braces approach.

YV submitted that there were good or compelling reasons for the application being made without notice (notwithstanding his submission that this test does not extend to claims against classes of Persons Unknown). The good and compelling reasons were that if JSO were notified of the application for an injunction before the hearing they may well decide to take direct action before the injunction took effect (which would only happen once all the steps of notification had been completed): (1) this would lead to a risk of severe harm; (2) JSO may defeat the very purpose of the injunction. Although it could be argued that this was not a case involving, e.g., blackmail or freezing orders, there could be irreversible harm if a serious accident occurred or other disruption to passengers; and, (3) in circumstances where they had no right whatsoever to do so. YV referred to *Birmingham CC v Afsar* [2019] EWHC 1560 where Warby J referred to the fact that this might not be a relevant consideration. But YV tried to distinguish that case on the basis that Article 10/11 ECHR would not protect JSO in this case as it was on private land.

The Judge noted that all of the land in respect of which the Claimants seek an injunction is private land and commented that the position had not been so straightforward in the HS2 route wide injunction.

YV referred to p.719 of the White Book, para 25.3.3 and the reference to the Privy Council judgment in *National Commercial Bank Jamaica v Olint Corp.* That judgment purported to set out 2 bases for going without notice: where there is no time to notify and where notifying would defeat the purpose of the injunction. YV argued that this case was in the specific context of banking and could not and was not purporting to speak to the gamut of cases, including the present one relating to trespass on private land.

### **3. The Site**

YV explained Plan A, Plan 1 and Plans 2-8.

YV explained that the internal layout of buildings had been redacted for reasons of national security.

YV confirmed that the Judge was correct in surmising that some of the areas edged blue in the main terminal building were retail areas.

YV explained the points at which Hartmann Road ceases to be an adopted highway and the point where Hartmann Road passes through a subway below the DLR.

In relation to the location of warning notices, the Judge noted that although the airport could be accessed from the docks, the Claimants were not proposing to post warning notices in those locations. YV argued that anyone seeking to access the airport from the docks would clearly be part of the campaign of direct action and would likely know about the injunction once JSO were notified. They would also only be subject to the injunction if they fell within the definition of Persons Unknown. Instructions were taken from the Claimants Head of Legal who referred to the fact that the water level changes as the docks are tidal and that airport regulations would need to be considered before any notices could be affixed to stakes so close to the runway. The Judge was satisfied that the Claimants had considered the most appropriate places to affix the warning notices.

#### **4. The Draft Order**

YV explained that the Claimants were seeking a 5 year injunction subject to annual review.

Strictly speaking, it was neither an interim nor a final injunction.

YV referred the Judge to the fact that 5 years plus an annual review appeared to have become the standard duration for injunctions which protect oil and gas refineries and terminals and he referred to the cases listed at paragraph 7.13 of YV's text book.

The following amendments were made:-

- in recital a – the reference to "Plans 2-9" was changed to "Plans 2-8
- in para 1 - the date was changed from 12 June 2027 to 20 June 2029
- in para 7 c – the wording was changed to allow the Claimants to include notification of the proceedings on the injunction warning notice

#### **5. Legal Tests**

YV referred the Judge to para 58 of Ritchie J's decision in *Valero v PUs* dated 26 January 2024 [2024] EWHC 134 (KB) in which Ritchie J set out his distillation of the 15 substantive requirements which the Claimant needed to satisfy. On the test to be satisfied for requirement number 3, YV accepted the test was higher than the serious issue to be tried threshold in *American Cyanamid*. He said whichever test you apply – "likely" to succeed at trial or the summary judgment test as in *Valero* – Cs satisfied it.



The Judge noted that there is no right to protest on private land “full stop”.

YV referred the Judge to the following paragraphs in Ritchie J’s decision in HS2 dated 24 May 2024 [2024] EWHC 1277 (KB) – 4, 5, 13, 15, 17 and 58-59.

The Judge noted that in substance if not in form, the Claimants were seeking a final injunction.

YV referred to an error in para 58(13) of Ritchie J’s judgment in Valero (the Judge referred to alternative service on Persons Unknown (which is inconsistent with *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 42 (SC) – see footnote 7 on p 11 of YV’s skeleton argument).

## **6. The Claimants’ submissions**

YV addressed each of the 15 substantive requirements set out in Ritchie J’s decision by reference to para 24 of his skeleton argument.

## **7. Full and Frank Disclosure**

YV said that it might be said against the Claimants that:-

- the Claimants should proceed after giving notice (YV had already addressed this);
- there was no evidence of a direct threat against London City Airport (again YV had addressed this);
- the Public Order Act 2023 includes offences which are related to protest (the Judge said that the criminal law has a different purpose and that criminal proceedings can take a long time. YV agreed and also referred to the facts that: (1) landowners are entitled to vindicate their private rights; (2) enforcement would be up to Cs; (3) of the protestors who had been arrested and charged with criminal offences following the October 2019 incident at London City Airport, only James Brown had been convicted; and, (4) the police themselves had recommended LCY consider obtaining an injunction.

The Judge said that he would grant the Order as sought, subject to the minor amendments discussed, but that rather than giving an *ex tempore* judgment, he would provide written reasons in due course.

The hearing concluded at 11:45 am

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

**CLAIM NO: KB-2024-001765**

**Before Mr Justice Julian Knowles**  
**On 20 June 2024**

**BETWEEN:-**

- (1) LONDON CITY AIRPORT LIMITED**  
**(2) DOCKLANDS AVIATION GROUP LIMITED**



**- v -**

**PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR  
OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT  
THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON  
CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE  
ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER  
DEFINED IN THE CLAIM FORM**

**Defendant**

---

**ORDER**

---

**PENAL NOTICE**

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

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

**IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN**

**This Order prohibits you from doing the acts set out in this Order. You should  
read it very carefully. You are advised to consult a solicitor as soon as possible.  
You have the right to ask the Court to vary or discharge this Order.**

**UPON** the Claimants' claim by Claim Form, dated 12 June 2024

**AND UPON** hearing the Claimants' application for an interim injunction, dated 12 June 2024, and supporting evidence, without Persons Unknown being notified

**AND UPON** hearing Counsel for the Claimants

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

**AND UPON** the "Land" being defined as that land known as London City Airport, as shown for identification edged red on the attached Plan 1 in Schedule 1, but excluding:

- a. Those buildings shaded blue on Plan 1;
- b. In those buildings shaded green on Plan 1, the areas edged blue on Plans 2-8;
- c. In those areas shaded purple, the land suspended over the ground and forming part of the Docklands Light Railway.
- d. In the areas shaded pink, the underground rail tunnel, the subway and that part of Docklands Light Railway located below ground level.

**IT IS ORDERED THAT:**

**INJUNCTION**

1. Until 20 June 2029 or final determination of the claim or further order in the meantime, whichever shall be the earlier, Persons Unknown must not, without the consent of the Claimants, enter, occupy or remain upon the Land.
2. In respect of paragraph 1, Persons Unknown must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
3. The injunction contained at paragraph 1 of this Order shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1.5 hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the review hearing.

**VARIATION**

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 48 hours in advance of any hearing.
5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimants have liberty to apply to vary this Order.

### **SERVICE AND NOTIFICATION**

7. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and Note of the Hearing on 20 June 2024 will be notified to Persons Unknown by the Claimants carrying out each of the following steps:
  - a. Uploading a copy onto the following website:  
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
  - c. Either affixing a notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9(d) below.
9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to Persons Unknown by the Claimants carrying out each of the following steps:

- a. Uploading a copy of the Order onto the following website:  
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
  - c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 1.
  - d. Affixing warning notices of A2 size at those locations marked with an "X" on Plan 1.
10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to Persons Unknown of any further applications shall be effected by the Claimants carrying out each of the following steps:
  - a. Uploading a copy of the application onto the following website:  
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>.
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
  - c. Affixing a notice at those locations marked with an "X" on Plan 1 stating that the application has been made and where it can be accessed in hard copy and online.
11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(a)-(b) only.
12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8(c), 9(c)-(d) and 10(c), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

### **FURTHER DIRECTIONS**

14. Liberty to apply.
15. Costs are reserved.

### **COMMUNICATIONS WITH THE CLAIMANT**

16. The Claimants' solicitors and their contact details are:

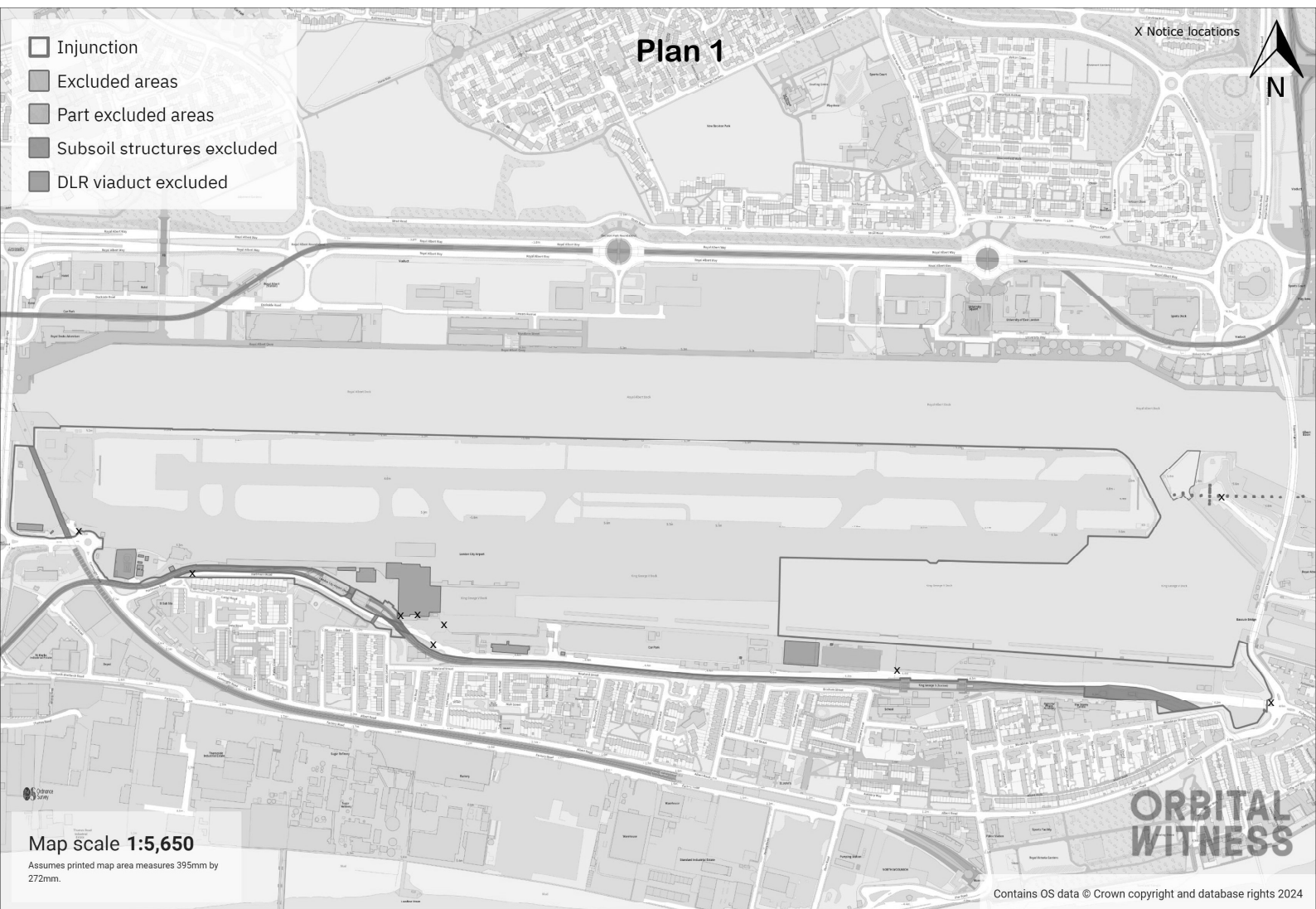
(1) Stuart Wortley  
Eversheds Sutherland (International) LLP  
[StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@eversheds-sutherland.com)  
07712 881 393

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

**Dated: 20 June 2024**

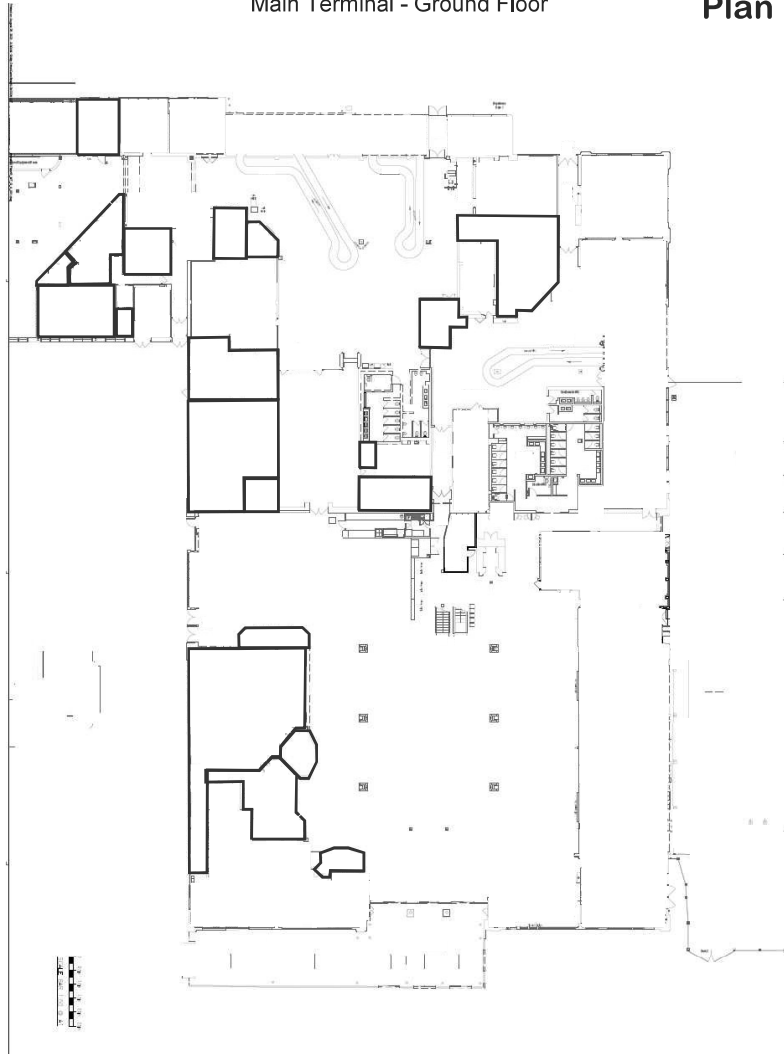


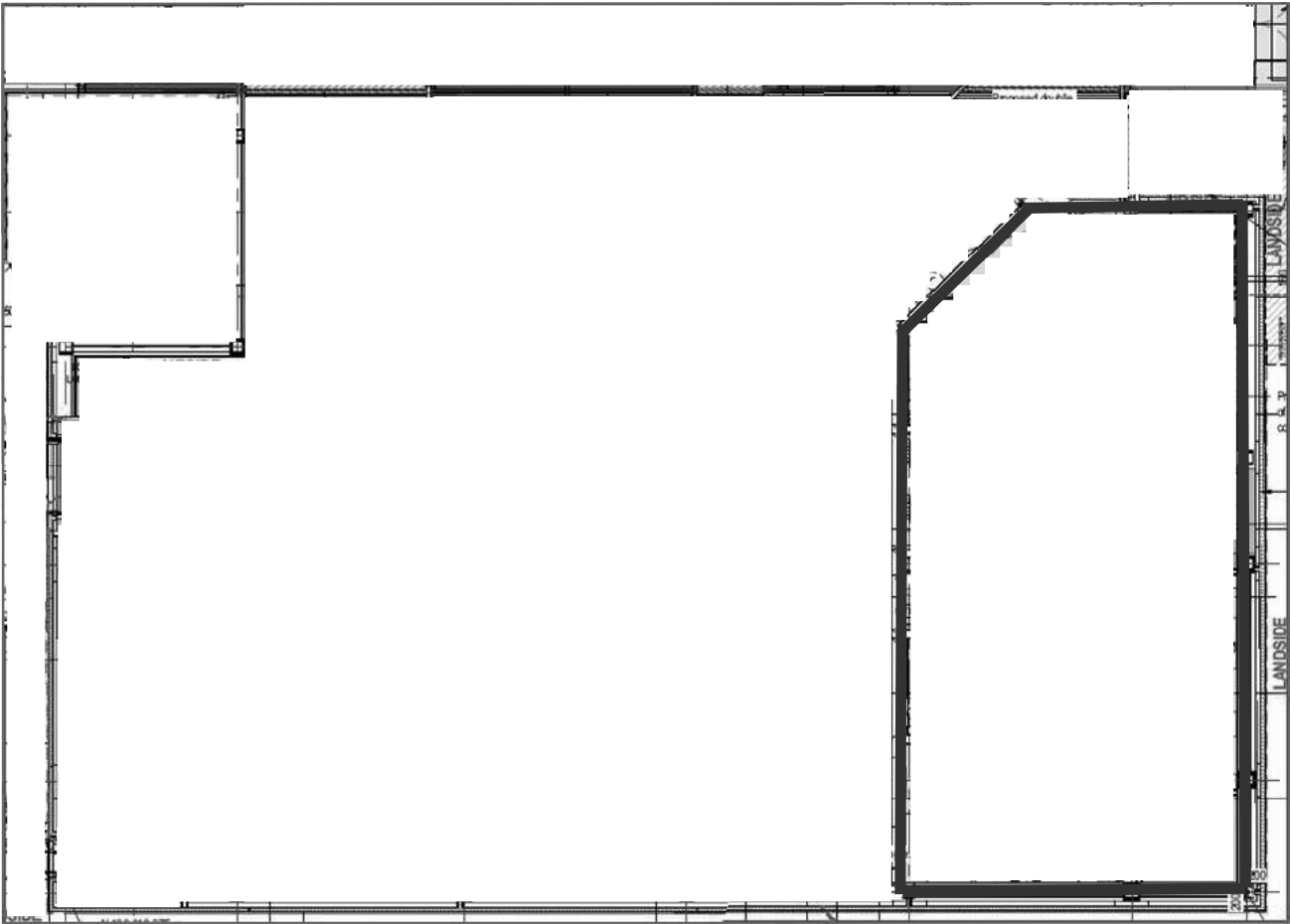
## **SCHEDULE 1 - PLANS**



Main Terminal - Ground Floor

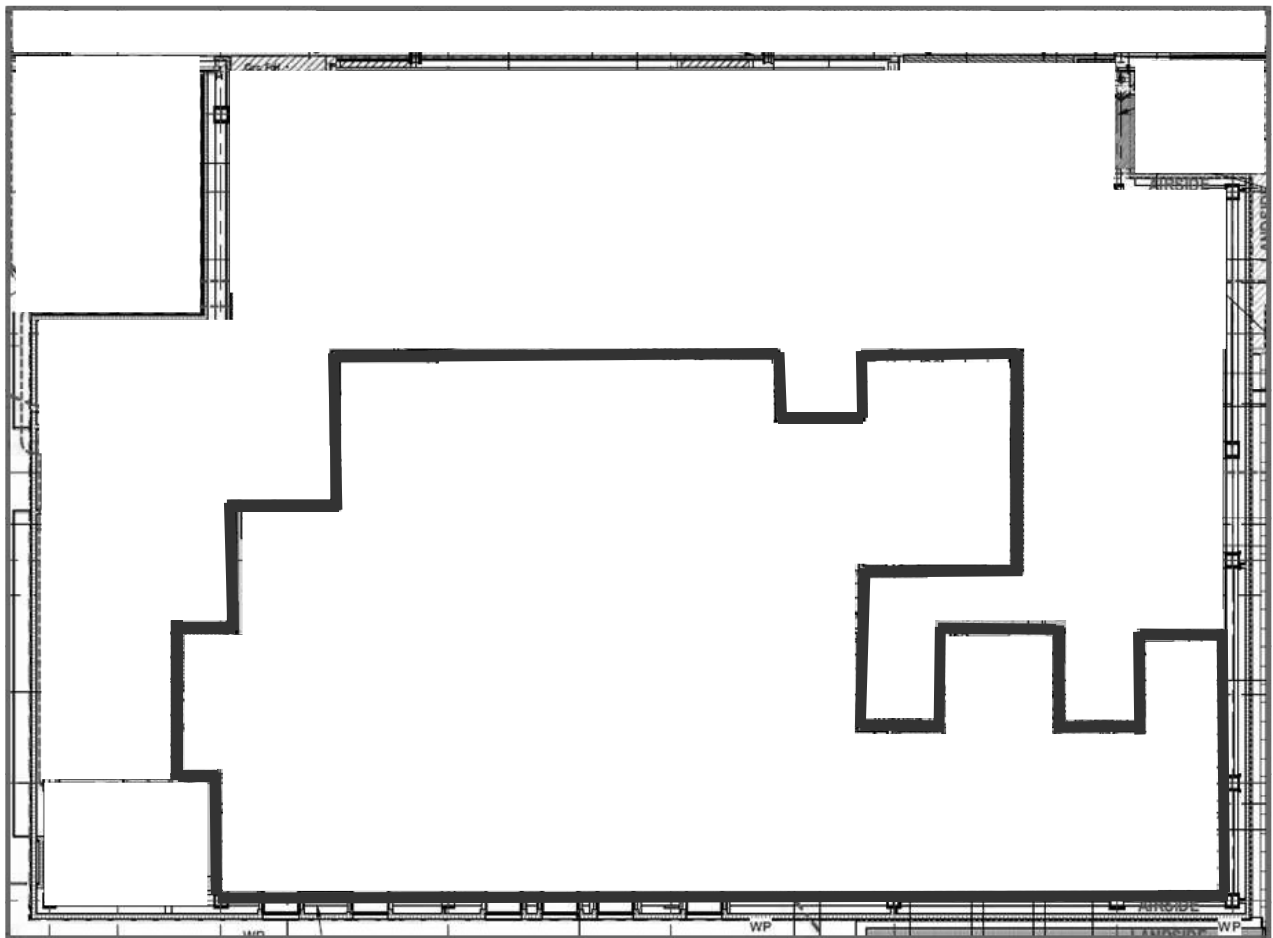
Plan 2





Terminal Immigration Facilities - First Floor

Plan 4



Blue Shed - Ground Floor

Plan 5

DO NOT SCALE - IF IN DOUBT ASK  
Associated Drawing

Client: **Robur**

1. Title	2. Revision
3. Date	4. By
5. Drawn	6. Checked
7. Approved	8. Scale

Project: **Blue Shed**

Client: **Robur**

Project: **Blue Shed**

Client: **Robur**

Project: **Blue Shed**

Client: **Robur**

Scale: **1:100**

Scale: **1:100**

Scale: **1:100**

Scale: **1:100**

Scale: **1:100**

Scale: **1:100**

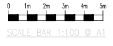
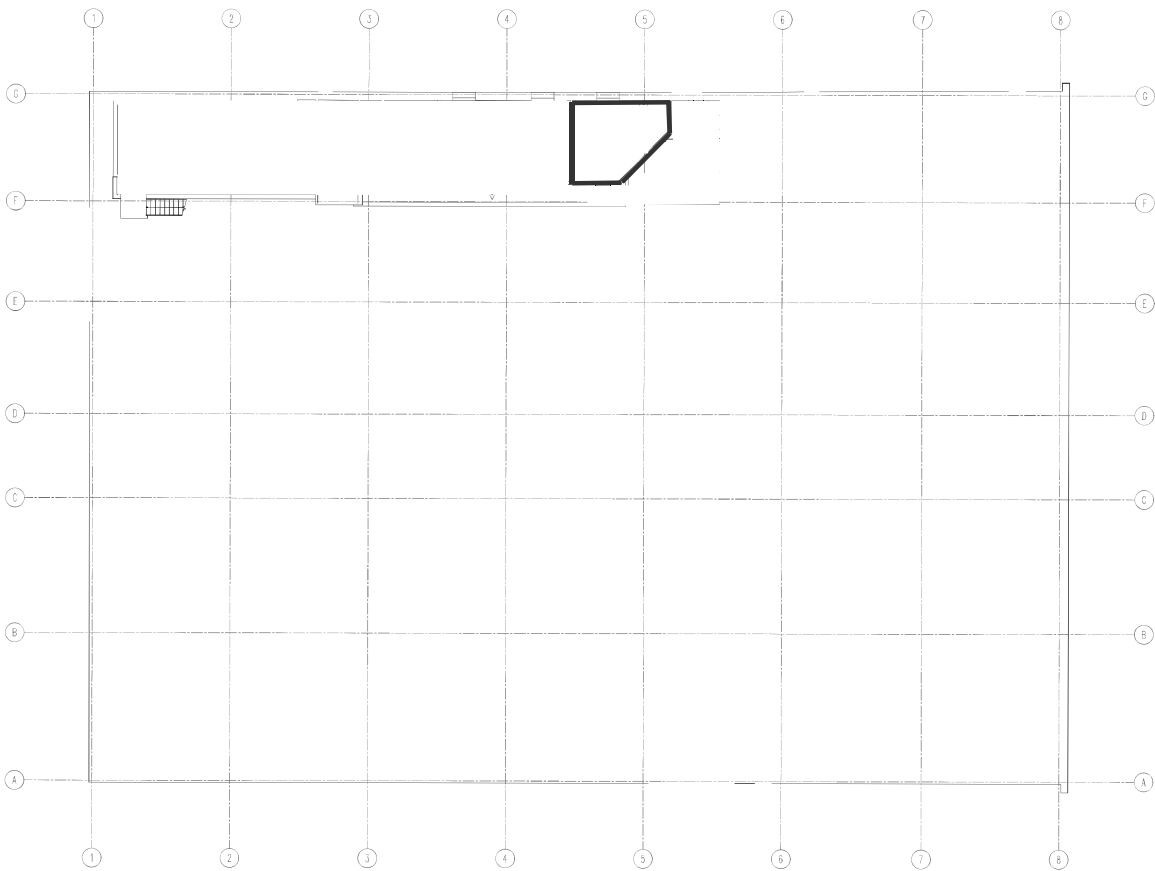
Scale: **1:100**

Scale: **1:100**



Blue Shed - First Floor

Plan 6



DO NOT SCALE - IF IN DOUBT ASK  
Associated Drawings

Current & Related:

LEGEND

XXXX FIRE DOOR

XXXX STANDARD DOOR

1. From Revision	2. To Revision
1. From Revision	2. To Revision

1ST FLR

London City Airport  
GATE 0308E

London City Airport, 03 Golden Square  
Road, London, E14 4PU

RECORD DRAWING

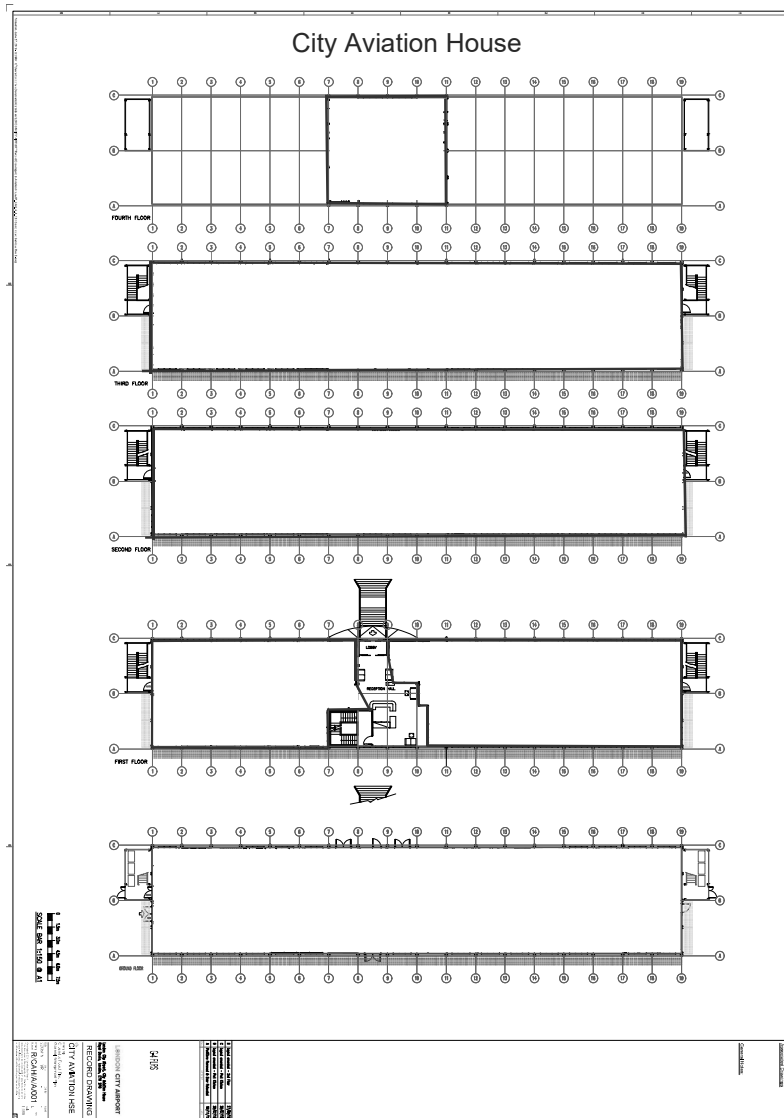
BLUE SHED

Drawn By: [Signature]  
Checked By: [Signature]

R/BS/11A/001

1:100





Plan ☐

## **SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS**

- (1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.
- (2) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

### **SCHEDULE 3 – EMAIL ADDRESSES**

- [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
- [info@juststopoil.org](mailto:info@juststopoil.org)

ADVERTISEMENT

# Just Stop Oil protesters 'are competing to see who can get arrested', it is claimed as five people are charged over disruption at Les Misérables

• Five people charged with aggravated trespass after Les Misérables was hijacked

By [ARTHUR PARASHAR](#)  
PUBLISHED: 00:38, 6 October 2023 | UPDATED: 01:21, 6 October 2023

27  
shares

Just Stop Oil eco-zealots are competing to see who can get arrested the most times in a bid to win prizes, it has been claimed.

Members of the pressure group, which campaigns for the Government to end all new oil, gas and coal licences, are said to be attempting to overload the legal system as protesters plan weeks of chaos.

Just yesterday, five of its activists were booed and jeered as they **hijacked a performance of Les Misérables** by clambering onto the stage at **London's** Sondheim Theatre before holding up their orange banner.



☒ Site ☐ Web

Enter y

ADVERTISEMENT

## TOP STORIES

EXCLUSIVE **The REAL reason behind Maya Jama and Stormzy's split revealed as couple 'call it quits' after second attempt at romance**

[Read More](#)

00:00

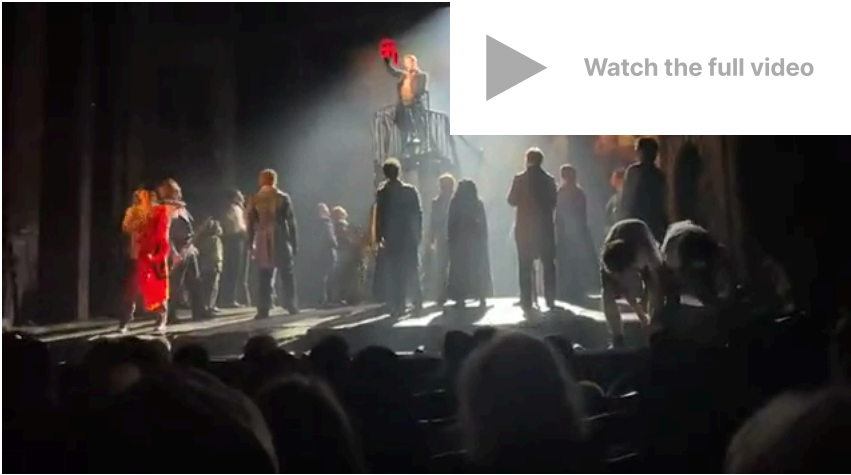
After being arrested last night Hannah Taylor, 22, Noah Crane, 18, and Poppy Bliss, 19, were charged with aggravated trespass. They have been released on bail and are due to appear at Magistrates' Court on November 3.



HB-192



Crowd boo JSO eco-activists as they disrupt Les Mis performance



▶ Watch the full video

EXCLUSIVE [Adar Peaty opens up on his recovery for Paris 202 after hitting 'self-destruct' and turning t alcohol](#)

ADVERTISEMENT



▶ [Trump shooter Thomas Crooks seen : rally an HOUR before shooting in shocking new video](#)

[Revealed: The 2C areas most at risk from Labour's house buildir boom](#)

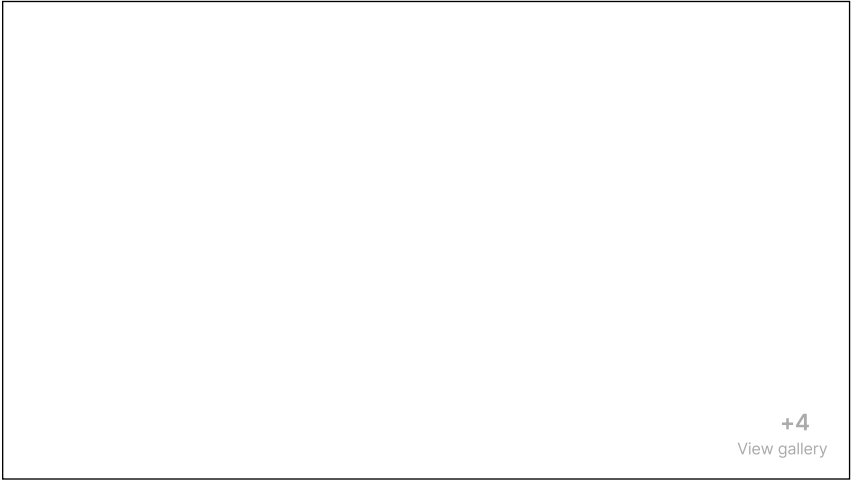
▶ [Primary school teacher, 30, who 'worked openly' as a £1,600-a-night escort and posted pictures of her and her partner having sex on a 'swingers' site' is struck...](#)

▶ [Keir Starmer boasts : Labour's 'new era' taking control of rail, energy and planning system as firms voice alarm at French-style workers' rights and bolstered ...](#)

▶ [Lauryn Goodman wears 'KW' necklace a courtroom showdown with her England star ex Kyle Walker](#)



Just yesterday, five JSO activists were booed and jeered as they hijacked a performance of Les Misérables



The group said in a statement that members were 'locked to the stage'. Five people have now been charged with aggravated trespass

TRENDING



[Trump shooter seen at rally an HOUR before shooting in new video](#)



[The silhouett smile. Why nobody like Kate: LIZ JON](#)

24.1k viewing now

58.6k viewing now

It has now emerged that Just Stop Oil members have been discussing the best ways to get arrested as many times as possible.

A JSO source told **The Sun**: 'It's essentially a competition to see who can get arrested the most. There will likely be prizes for the winner — that sort of thing has happened at previous gatherings after a round of action.'

The newspaper found one eco-zealot discussing a planned demonstration on October 29 in a group chat. They said they would be going to marches with 'other regions', adding: 'This will allow me to spread the average three arrests per person easily over three weeks instead of trying to be a superhuman and pull it off in a single week.'

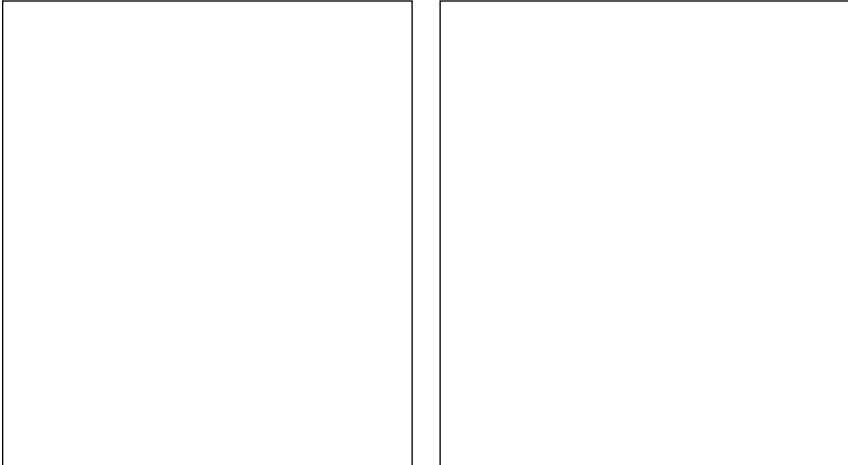
Reports of eco-zealots competing for arrests come in a week where they disrupted yet another event that hard-working Brits paid up to £200 per ticket for. The Les Mis performance at the Sondheim Theatre in London's West End was brought to a halt at around 9pm on Wednesday.

Police said they are keen to hear from audience members who may have travelled from outside London to see the show.

In footage shared of the musical being hijacked, the protesters climbed up to the stage and asked the audience to 'join the rebellion.'

But one furious theatre-goer shouted: 'Get off you stupid people. How dare you.'

Another yelled: 'You naughty people, you naughty people.'



**Just Stop Oil said two of the protesters were called Hanan (left) - a 22-year-old student - and Noah, 18 (right). Both have been charged**

JSO eco-mob crash Les Miserables performance and disrupt

 Watch the full video

As others booed and jeered the eco protesters one of the eco-protesters' banners.

The stage invasion occurred during the musical the People Sing? which is often seen as a call

ADVERTISEMENT

► **Money talks!** New series sees celebrity property expert Tayo Oguntunade help one family plan for the future (and their forever home)  
**AD FEATURE**

The silhouette, the smile. Why nobody does it like Kate: LIZ JONES

**EXCLUSIVE** Christina Hall pictured for FIRST TIME since split from Josh Hall as glum HGT star DITCHES wedding ring ahead of third divorce

► **Inside 'deathtrap'** ravine where Jay Slater's body was found: Drone footage reveals rugged and treacherous Tenerife landscape in which teenager spent his final moments

► **Jude Bellingham is** football's Emma Raducanu, Gareth Southgate was stuck in a time warp... and Bukayo Saka is the rightful player of the year: JEFF POWELL'S damning...



◀ ▶ ⏮ ⏭ 🔊 0:00 / 0:36 

world in rebellions including the 2019 Jong Kong demonstrations.

Posting on X, formerly Twitter, on Wednesday, about Les Mis protagonist Jean Valjean, Just Stop Oil said: 'Valjean steals bread to feed a starving child. How long before we are all forced to steal?'

The post continued: 'The fossil fuel show can't go on.'

The Mail also revealed on Thursday that **Oxford University's** student union invited **Just Stop Oil** to host a stall at this year's freshers' fair.

Daniel Knorr, 21, who stormed Lord's cricket ground during the second Ashes test match this summer, was pictured manning the stand and recruiting students to join the radical eco-protest group.

He also posted 17,000 JSO leaflets to Oxford students via their college cubby holes earlier this week.

It comes despite Education Secretary **Gillian Keegan** warning last month that students risk ruining their futures if they participate in slow-march protests organised by JSO.

Just Stop Oil told MailOnline after storming the Les Mis musical: 'This summer has shown us the sheer power of a supercharged climate.

'Scientists are freaking out and even the Pope is sounding the alarm. But, like the citizens of Paris in 1832, we have locked our doors, while our young face slaughter on the streets.

'They will inherit a scorched earth, unfit to live in and we will be long gone. We cannot let this stand. The show cannot go on.'

The group has been contacted for comment about competing for arrests.

- Just Stop Oil
- Oxford University
- Gillian Keegan

Share or comment on this article: Just Stop Oil protesters 'are competing to see who can get arrested', it is claimed as five people are charged over disruption at Les Miserables

27 shares

Recommended by Outbrain

The surprising health benefits of orgasms: From boosting your immune system to unblocking your nose

'I've never heard from her since that day': Dog saviour of Kabul Pen Farthing reveals how his wife left him in the most unexpected way as his life fell apart af...

► ITV's new show 99 T: Beat is plunged into CHAOS as 'three contestants are rushe to hospital' during filming

ADVERTISEMENT



## The Best Folding Beds for Small Spaces - Prepare to Be Amazed!

Folding Beds | Search Ads | Sponsored

► Labour warned that French-style overhaul of workers' rights that gives immediate access to flexible working, sick leave and dismissal protection could end up co...

Physically unfit, under-qualified agent with a diversity-obsessed boss chosen by Dr Jill Biden! After Secret Service botches the Trump shooting, ANDREW NEIL ex...

Nigel Farage and



**IN THE HIGH COURT OF JUSTICE  
KINGS BENCH DIVISION**

**BETWEEN:-**

- (1) MANCHESTER AIRPORT PLC**
- (2) AIRPORT CITY (MANCHESTER) LTD**
- (3) MANCHESTER AIRPORT CAR PARK (1) LIMITED**
- (4) STANSTED AIRPORT LTD**
- (5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD**

**Claimants**

**- v -**

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**
- (2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**
- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**

**Defendants**

---

**NOTE OF "WITHOUT NOTICE" HEARING BEFORE  
HER HONOUR JUDGE COE K.C.  
5 JULY 2024**

---

Hearing commenced at 14:00.

The Judge had read the hearing bundle, the Claimant's skeleton argument, and he had received the authorities bundle.

TMKC introduced the case as one under the newly described jurisdiction which has been in the Supreme Court in Wolverhampton – sui generis relief against Persons Unknown.

TMKC addressed a misstatement in the skeleton argument in which it says that the third parties were asked about whether they would like to take part as joint Claimants. In fact, they were not

asked due to time pressure but there were miscommunications between TMKC and those instructing him.

Judge explained that if an Order is made as requested, it will presumably need to include provisions for the third parties to be notified.

### **Manchester Airport**

Manchester Airport is a difficult area, but the "X" marked locations are where it is proposed to put notices.

TMKC referred to the Byelaws plan and how it cannot be used for the Injunction as it was not accurately drawn, as a result, C has attempted to duplicate the Byelaw map as if it had been done properly in producing the plans for the injunction (refers to witness statement of Mr Wortley).

TMKC described the title ownership of C at Manchester Airport and how the red line on Plan 1 falls within the land on Plan A, either as freeholders or leaseholders.

The effect of that in point of law is C's right to maintain trespass subject to certain exceptions (to be addressed later); such that no one has a right to be on that land except by C's consent.

TMKC, referring to witness statement of Mr Wortley (para 17) explained the carved out areas shown coloured blue, green and pink on Plan A etc.

TMKC explained that the carved out plans can create confusion, but it shows that in some instances C cannot claim trespass.

In order to make our claim good in trespass. Jurisdiction to give us relief on that basis.

TMKC explained the use of nuisance / threatened nuisance arising from the carved out areas, and an unreasonable use of land and the need for those areas to make the injunction in respect of the remaining land effective. TMKC uses example of protest at Stansted over a carved out area, which resulted in the runway being shut as a result of the risk of over-spill.

There were no trespass in that instance but the relief afforded by the injunction is still required.

### **Stansted Airport**

TMKC explained that Plan 2 would be attached to the Order.

TMKC described the title ownership of C at Stansted Airport, and how the red line on Plan 2 falls within the land on Plan A, as either freeholder or leaseholder; third party areas are depicted in plan 2A.

TMKC explains there is no complication due to highways but there remains some complexity because floor plans in pockets of third party interests in different buildings at Stansted. Further, it would be inappropriate and misleading to treat the blue areas differently to the generality.

### **East Midlands Airport**

TMKC explained Plan C, Plan 3 and the carved out plans.

TMKC explains why it is appropriate and necessary for us to be in receipt of the injunction in relation to trespass regarding the generality effective.

TMKC explained the effectiveness of injunctions in relation to other organisations (e.g. National Highways) but that campaigners have shifted their focus to airports. That has been manifested by pronouncements made expressly which Mr Wortley's statement sets out and the recent protest at Stansted.

TMKC disclosed the byelaws, relief of aggravated trespass and interference with national infrastructure. Those are available to the Airport, but the witness statement of Mr Wortley (para

42) includes evidence from which can be inferred that the protestors are willing to task risk in front of jury / magistrates but not a High Court judge.

TMKC explained how ineffective byelaws are for the type of action intended for the injunction to prevent – including the threshold of the punishment.

### **Legal tests / full and frank disclosure**

TMKC referred to the cause of action.

TMKC addressed the duty of full and frank disclosure, including sufficient evidence to prove the claim, no realistic defence, *DPP v Zeigler*, damages not being an adequate remedy, and that if the injunction prohibits any conduct that is lawful, then it must be in a way that is no more than is proportionate.

The balancing exercise for the Judge in deciding whether to grant the injunction only needed to be done in public land (i.e. where there were highways) and clearly favoured the grant of an injunction.

TMKC referred to Leggatt LJ in *Cuadrilla* (endorsed in Court of Appeal in *Canada Goose* and Supreme Court in *Wolverhampton*) in relation to the third party area, makes the point that although the court must be careful not to impose an injunction in wider terms than are necessary to do justice, the court is entitled to restrain conduct that is not in itself tortious or otherwise unlawful if it is satisfied that such a restriction is necessary in order to afford effective protection to the rights of the claimant in the particular case. Leggatt LJ makes the point that there is nothing objectionable in principle in using intention to define the defendants. There will be need for C to prove the purpose is to protest (otherwise the claim to commit would fail)

The proposed title of the Defendants do not fall foul of *Hampshire Waste*. "Persons intending to trespass or trespass" – this did not capture people whether or not on the land (too wide). This claim only seeks people whose purpose is to protest.

### **Draft Order**

TMKC guided the Judge through the draft Orders sought.

- Description of D:-
  - bespoke wording "or on any flight therefrom"
  - the only plausible explanation is the purpose of protest at airport or aeroplane at airport or aeroplane.
  - "whether in connection with JSO or otherwise" – if persons disavowed the campaign.
- Judge explored why other groups were not included in the definition of Ds, and suggested that other groups of which Cs are aware be added to that definition. TMKC agreed with the Judge and obtained permission to amend the Claim Form and POC.
- Para 3, with immediate effect – sometimes says until [date] in the future. One way of giving effect of temporal certainty. Your ladyship's decision.
- Judge concluded that reviews after 24 months is too long, but will reduce to 12 months.
- Judge confirms that the claim is best to be served rather than notification.

### **Judgment at 15:34**

Pursuant to Supreme Court's decision in *Wolverhampton* and the decision in *Valero*, principles are quite clearly set out now.

Cs are those who own 3 airports in the UK. Manchester, Stansted and East Midlands Airport. Ds who are persons unknown are those who, as described in POC, and which permission has been given to amend.



Ds are people who feel strongly that fossil fuel use should cease and are engaged in a campaign of protest at various locations. Already well reported protests have caused significant disruption. Those involved are active on the internet and have indicated that this particular summer they have an intention to continue this protest at airports (as seen in the evidence of Mr McBride and Wortley).

They intend to cause disruption in the summer and they consider this could be scope for some publicity for the campaign. In light of that Cs have brought applications such as these. Newcomer application, in the sense that the PU are those who cannot be identified but are identifiable by purpose. The sui generis were specifically addressed in *Wolverhampton* in the Supreme Court. The principles are much clearer and further clarified by Mr Justice Ritchie. In short form, Court must be satisfied that there is a compelling need for the injunction of this kind. I am satisfied that I have been taken very carefully through the areas of protection of injunctions has been sought. Referred to plans 1 and 2 in Manchester and Stansted, and 3 in East Midlands. The land in question is owned by various Cs.

There are complications with claims for trespass, as there are various leases and licences which give right to others to occupy. Cs do not have an immediate right to possession and therefore the claim in trespass cannot be supported for all of the land.

Considerable work has been done by Cs. Land is in ownership of Cs. Premise is that if an injunction is granted only on basis of land which is owned, that would not provide a practical solution but by reference to authorities that Cs are entitled to these applications where it is necessary to make that which they seek effective. The risk is that any protestor will nonetheless threaten nuisance spilling out onto land they do own. There are examples of that already occurring for protestors within this category.

It is appropriate to do so in respect of all of this land shown on Plans 1, 2 and 3. And authorities make that quite straightforward. I have to be satisfied that there is a compelling need here. Satisfied here of compelling need.

Injunctions are necessary and proportionate and there is clear evidence of threat and intention to target airports, in a way that has already been targeted. Examples were given of Gatwick airport. Experience at Stansted with wire cutters. The threat is real and imminent and already manifested itself.

Consequences are of particular significance: Airports are sensitive places where security is paramount. This sort of disruption. Delay or disruption but also increased sensitivity from evidence of Mr McBride because targets for terrorists. Airports have to respond because this could be a mask for a terrorist activity. Damage to aircraft and other security issues and significant financial repercussions.

Also, I should take into account what arguments Ds might have raised. This is a without notice application and they are not here – it does not mean should not take that into account. Ds have been arrested for various criminal offences – Criminal Justice and Public Order Act and Public Order Act. Similarly, there are byelaws. The disadvantage is that they are enforceable after the action has taken place. The criminal system does not prevent action in the way that an injunction does. Scope for prosecution is not a remedy for Cs.

Should have said before that I have been referred to the point about tipping off and satisfied that appropriate to make the application without notice. The Claimants have not only given full and frank but have gone to some length to set out what might have been said. Included byelaws.

I am satisfied that necessary to make the injunctions and there is a compelling need.

Legal approach – I would cite the section of Mr Justice Ritchie in *Valero* – the matters I need to be satisfied about. Hard to see what particular harm to the PU in preventing them from carrying out the sort of protest over land which is privately owned.

In the interests of putting everything before the Court, Cs in Manchester Airport have referred to the fact that there are highways. There is a right to public generally and so therefore have to take into the rights of the protestors under the ECHR, particular Arts 10 and 11.

There is a need to consider when the balancing exercise that any interference is something which would cause me not to make this order. Right to peaceful protestation are to be protected do not include the deliberate and criminal behaviour which is the threat here.

The need remains compelling and any interference does not outweigh the need for the injunction.

Cs have agreed to provide a standard undertaking in damages. As part of the injunction, and if there is anyone they would be able to seek a remedy to damages.

In those circumstances, it is appropriate to make the orders sought. I should say that: appropriate for the definition of Ds to include any other organisation of which Cs are aware and have a website or email address.

This is not a case where it is appropriate to have an interim order with return in 2 weeks. As was set out in *Wolverhampton*, this is *sui generis*. As far as interim or final orders are concerned, anyone has a right to come and have the order discharged or varied. Indicated that this will be reviewed, rather than to last for, in 12 months, which is sufficient to cover off the threat. Reflect the sequential nature of the campaigns organised at various location.

Third parties with interests at the airports should be notified.

Hearing concluded at 16:00.

**IN THE HIGH COURT OF JUSTICE**  
**KINGS BENCH DIVISION**

**BEFORE: HER HONOUR JUDGE COE K.C.**

**DATED: 5 July 2024**

**BETWEEN:-**

**(1) MANCHESTER AIRPORT PLC**  
**(2) AIRPORT CITY (MANCHESTER) LTD**  
**(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED**  
**(4) STANSTED AIRPORT LTD**  
**(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD**



**- v -**

**KB-2024-002132**

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**
- (2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**
- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**

**Defendants**

## **ORDER**

---

### **PENAL NOTICE**

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

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

### **IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.**

**UPON** the Claimants' claim by the Claim Form dated 3 July 2024

**AND UPON** the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

**AND UPON READING** the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

**AND UPON** HEARING Leading and Junior Counsel for the Claimants

**AND UPON** each of the First, Second and Third Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

**IT IS ORDERED THAT:**

### **DEFINITIONS**

1. **“Manchester Airport”** means the land shown outlined in red on Plan 1 to the Claim Form (including the highways therein), appended to this Order in Schedule 1 (**“Plan 1”**).
2. **“Warning Notice”** means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (<https://www.manchesterairport.co.uk/injunction/>) at which copies of this Order may be viewed and downloaded).

### **INJUNCTION**

3. With immediate effect, unless varied, discharged or extended by further order, the First Defendants and each of them are forbidden from doing the following:
  - a. Entering, occupying or remaining on any part of Manchester Airport without the consent of the First, Second and Third Claimants (or any of them);
  - b. Affixing themselves to any other person or object on Manchester Airport;
  - c. Impeding access to or enjoyment of Manchester Airport by the First, Second and Third Claimants (or any of them) and those authorised by the First, Second and Third Claimants (or any of them), whether by blocking any entrance or otherwise;
  - d. Blocking or obstructing the free and safe passage of traffic onto or along or across the highways within Manchester Airport;
  - e. Refusing to leave the aforesaid parts of the highways when asked to do so by a police constable, when contravening any of paragraphs 3(b) and/or (d);
  - f. Continuing to do any act prohibited by paragraphs 3(a) to (e) above.
4. This Order is subject to periodic review by the Court on application by the First, Second and Third Claimants at intervals not exceeding 12 months.

### **SERVICE**

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First, Second and Third Claimants shall take the following steps by way of service of copies of the amended

Claim Form, amended Particulars of Claim, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") upon the First Defendants:

- a. Uploading a copy onto the following website:  
<https://www.manchesterairport.co.uk/injunction/>
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
  - c. Affixing a notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy.
6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the First Defendants by the First, Second and Third Claimants carrying out each of the following steps:
  - a. Uploading a copy of the Order onto the following website:  
<https://www.manchesterairport.co.uk/injunction/>
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
  - c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 1.
  - d. Affixing Warning Notices of A2 size at those locations marked with an "X" on Plan 1.
7. The taking of such steps set out at paragraph 5 and 6 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendants and each of them.
8. The Court will provide sealed copies of this Order to the First, Second and Third Claimants' solicitors for service (whose details are set out below).
9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

**FURTHER DIRECTIONS**



10. Service on the First Defendants of any further applications or documents in the proceedings by the First, Second and Third Claimants (or any of them) shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).
11. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the First, Second and Third Claimants' solicitors 72 hours' notice of such application by email to [StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@eversheds-sutherland.com) . If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the First, Second and Third Claimants' solicitors at least 48 hours in advance of any hearing.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
13. The First, Second and Third Claimants (or any of them) have liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

#### **COMMUNICATIONS WITH THE FIRST, SECOND AND THIRD CLAIMANTS**

16. The First, Second and Third Claimants' solicitors and their contact details are:

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

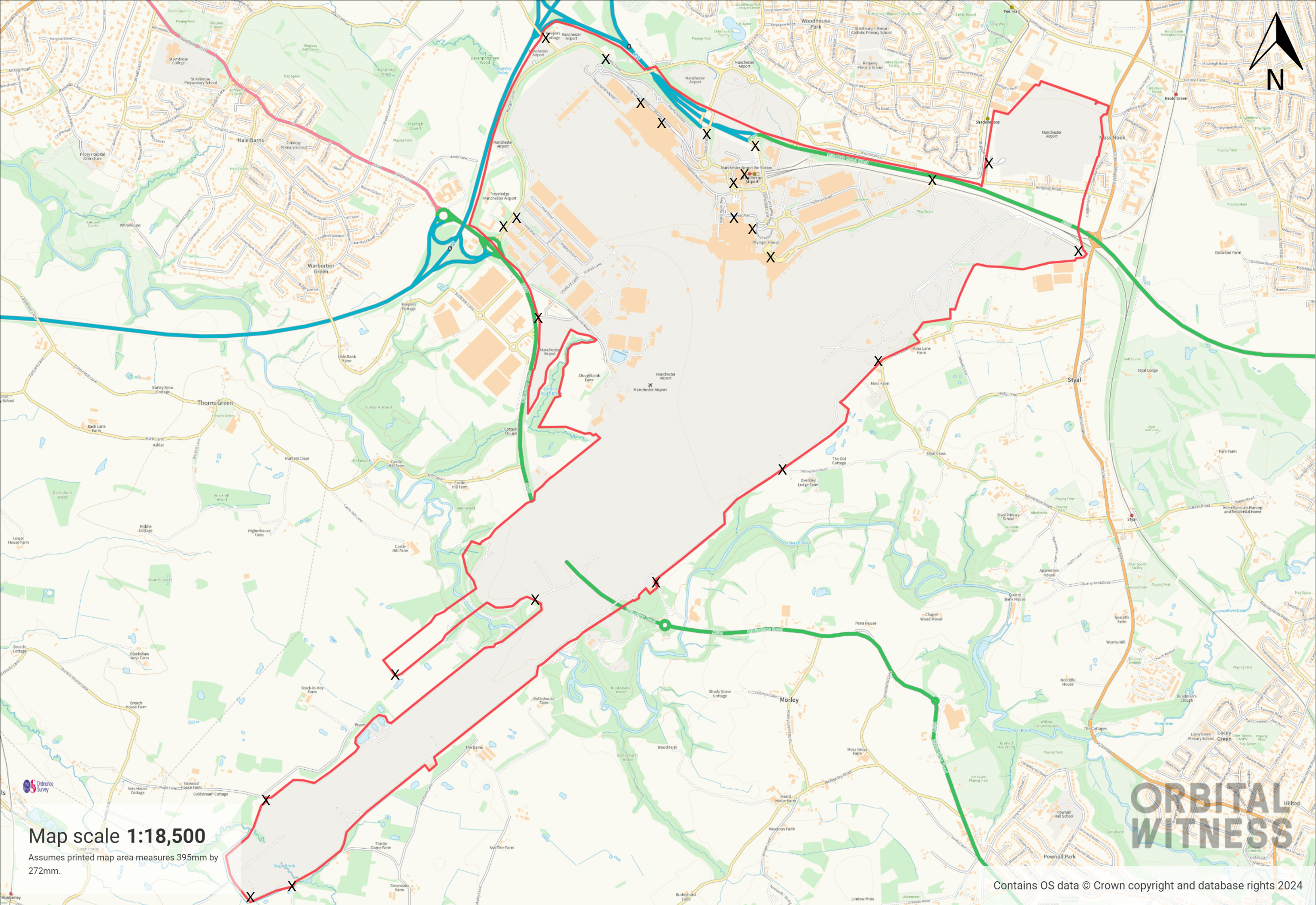
(2) Nawaaz Allybokus  
Eversheds Sutherland (International) LLP  
[NawaazAllybokus@eversheds-sutherland.com](mailto:NawaazAllybokus@eversheds-sutherland.com)  
07920 590 944

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



## **SCHEDULE 1**







## **SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST, SECOND AND THIRD**

- (1) The First, Second and Third Claimants will take steps to serve the First Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.
  
- (2) The First, Second and Third Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

### **SCHEDULE 3 - EMAIL ADDRESSES**

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- [info@juststopoil.org](mailto:info@juststopoil.org)
- enquiries@extinctionrebellion.uk



## **SCHEDULE 4 - WARNING NOTICE**

# High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

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

**FROM:** Manchester Airport Plc, Airport City (Manchester) Ltd, and Manchester Airport Car Park (1) Limited (“the **First, Second and Third Claimants**”)

This notice relates to the land known as Manchester Airport, Manchester, M90 1QX which is shown edged red on the Plan below (the “**Airport**”)

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the First, Second, and Third Claimants
2. Affixing themselves to any other person or object on the Airport.
3. Impeding access to or enjoyment of the Airport by the First, Second and Third Claimants or those authorised by the First, Second, and Third Claimants, whether by blocking access to any entrance or otherwise.
4. Blocking or obstructing the free and safe passage of traffic onto or along or across those parts of the highway show the red line outlined on the Plan;
5. Refusing to leave the parts of the highways on the Plan when asked to do so by a police constable, when contravening any paragraph 1 and/or 4.

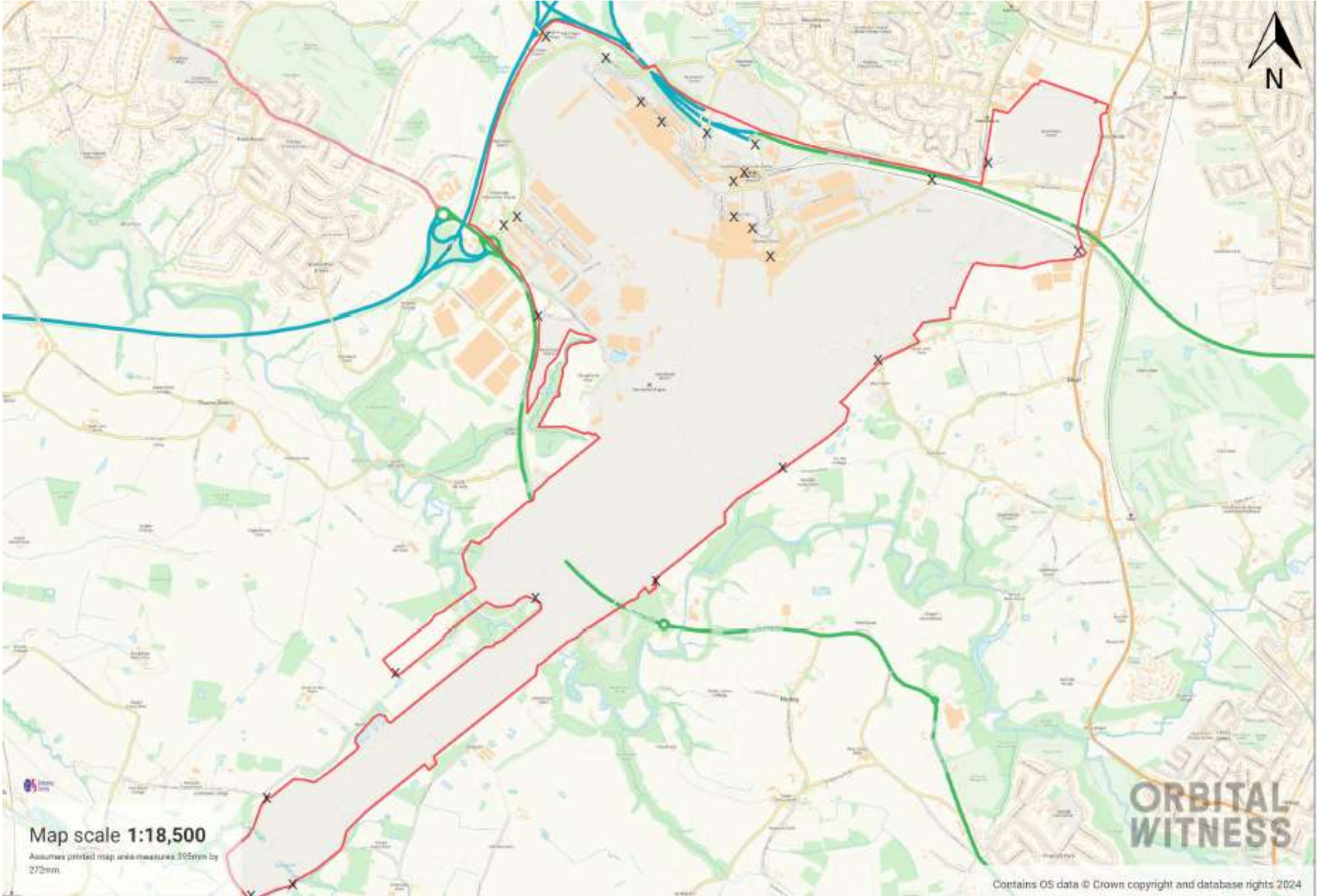
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

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

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: <https://www.manchesterairport.co.uk/injunction/>

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email: [StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@eversheds-sutherland.com)



**IN THE HIGH COURT OF JUSTICE**

**Claim No. KB-2024-002210**

**KINGS BENCH DIVISION**

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

**HEATHROW AIRPORT LIMITED**

**Claimant**

**-and-**

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR  
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN  
(WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW  
AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE  
PARTICULARS OF CLAIM**

**Defendants**

---

**NOTE OF "WITHOUT NOTICE" HEARING BEFORE  
MR JUSTICE JULIAN KNOWLES  
LISTED FOR 9 JULY 2024 AT 14:00**

---

The hearing was originally listed before Mrs Justice Cutts at 10:30am on 9 July 2024. The Hearing Bundle refers to that original listing on its face.

The hearing commenced at 13:58. Appearing for the Claimant, Katharine Holland KC ("**KH**") and Jacqueline Lean ("**JL**") before Mr Justice Julian Knowles ("**J**").

1. KH expressed appreciation for the listing of the urgent hearing and Knowles J making the time in his listings.
2. J confirmed he had electronic papers sent last night and had read the Skeleton Argument and witness evidence and reviewed some plans. He is relatively familiar with the case law, generally from the press, and from similar cases covered recently.

3. KH proposed to take J through the Skeleton Argument in order and, mindful of the without notice nature of the application and duty of full and frank disclosure to cover everything but will note any areas if J wishes to move on.
4. J confirmed no need to go laboriously through underlying risk and threat evidence, he has seen some similar evidence before and has a general awareness. Obviously, the Claimant must demonstrate their entitlement to an order though.

### **Opening**

5. KH outlined Heathrow is Europe's busiest airport and a piece of Critical National Infrastructure. In relation to Just Stop Oil ('JSO'), there is a specific threat to Heathrow that may not have applied or been so obvious at London City ('LCY') where J had previously granted an injunction, namely the JSO video specifically identified Heathrow. J indicated it was not necessary for Counsel to review the JSO background and threatened deadline to MPs, etc. in detail.
6. KH clarified the Claimant is adopting a claim based on the UKSC's decision in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 W.L.R. 45 to be referred to in detail later.
7. KH outlined how big Heathrow is and summarised the title, reference to Skeleton Argument para 3. KH clarified the perimeter and parcels within, exhibited at Hearing Bundle ('HB') page 15. Titles within Claimant ownership and the perimeter plan (HB24).
8. J remarked it is a much bigger site so he wished to orient himself. The left most purple line and orange building is Terminal 5. North is the A4.
9. KH clarified that blue hatched areas are leased to other non-parties. The terminals are coloured orange and on numerous floors have various third party occupants. J asked for an example and KH hypothesised Boots. J gave examples of Border Force and police leases.

10. KH clarified the classic cause of action in trespass over land where the Claimant has an immediate right to possession (shaded yellow on the plan) is a textbook example. But the Court will be addressed on how the perimeter as defined, regardless of third party interests within, gives the Claimant sufficient right in case law to claim over the whole area edged purple, including (as J queried, having looked at it in the *HS2* case) via *Manchester Airport Plc v Dutton & ors* [2000] 1 Q.B.133.
11. J queried, in short, whether the point was that the title was better than that of any trespasser. KH said that was exactly so and indicated there were other principles to similar effect.
12. KH directed J to HB339 where there is a larger plan. KH clarified as per the witness evidence some OCEs were still on order from HM Land Registry but, on the evidence as a whole in this case, the ownership is clear.

### **Right to Possession**

13. KH explained that the backdrop is the Claimant's 'better right' to control based on 3 documents – as operator (Certificate of operation), with the benefit of the economic licence granted under Civil Aviation Act 2012 and also by virtue of the Byelaws made pursuant to s.63 or s.64 of the Airports Act 1986.
14. J confirmed he did not need to review the principle of Byelaws in detail, being familiar from the LCY claim.
15. KH explained that the backdrop is control and how the Claimant exercises it as a totality over the whole area.

### **Apprehended Action**

16. For the Court's note, the witness evidence is p298-302 (Akhil Markanday) and p47-48 (Jonathan Daniel Coen). Skeleton Argument paragraph 13. Skeleton Argument paragraph 15 relates to the campaign targeting airports and paragraph 16 historical events.

17. J was familiar with an event at LCY where someone glued themselves to a plane. J was also familiar with the self-evident hazards in and around airport restricted areas.

### **Causes of Action**

18. KH explained that trespass is extremely clear cut (*Secretary of State for the Environment, Food and Rural Affairs v Meier* [2009] 1 WLR 2780). KH took J to Skeleton Argument paragraph 23 and the *Dutton* case, quoting the headnote on page 146 of authorities bundle and the Court of Appeal's conclusion. J was taken to the *Twickenham* case cited in *Dutton* in the same Skeleton Argument paragraph.
19. KH explained that the Claimant seeks an order necessary to vindicate and give effect to the rights it necessarily enjoys (via the certificate, licence and Byelaws). The second sentence of *Twickenham* (*Dutton* page 144, c to d) is relevant to statute giving us a degree of control, see Laws LJ. Finally, p151 at letter d is relevant.
20. KH explained that all of these principles were said by the Claimant to flow from *Dutton*. In *High Speed Two (HS2) Limited v Four Categories of Persons Unknown* [2022] EWHC 2360 (KB) at Skeleton Argument paragraph 23.2, this is J's own judgment and paragraph [77] is relevant. We also cite *Mayor of London v Hall* [2011] 1 WLR 504 at [22]-[27] given our title complexity. J was directed to read [27] in particular. KH also directed J to [53], albeit it was not in highlighted in the Skeleton Argument.
21. KH took J to the Skeleton Argument paragraph 25, and explained that the Claimant said that the certificate, aerodrome manual, licence and Byelaws make good the case for the Claimant's necessary control.
22. J asked about Skeleton Argument paragraph 23 and the certificate. KH clarified this is an operational conferment, pursuant to which there is the aerodrome manual and referred specifically to HB94 and HB101. KH referred to Skeleton Argument 25.1.2.
23. KH then referred J to the economic licence which confers a right to charge – also denoting a level of control. Then the Byelaws (HB256) confer ability to regulate use/operation/conduct of persons.



24. KH explained that, in a nutshell, this is a ‘do not go on to the airport in connection with this’ approach. A very simple one. Defendants are defined as persons entering in connection with the campaign. Fact of entry is simple and correct way of defining in relation to those activities. The general position in relation to the airport is that there is a certain permission to go on and use, but going on in connection with a campaign is not what one would expect in that general scenario.
25. J picked a Byelaw example – not to display signs. Presumably an activity with placards would be an automatic violation?
26. KH agreed, and drew attention to the two Byelaws which were the easiest ones to indicate the Claimant’s approach was correct, being byelaws 3.19 and 3.21 (HB270). Those referred to the very activities the definition of Defendant addressed. KH directed J to Skeleton Argument paragraph 27.
27. J noted a point he had raised in the LCY hearing that he had noticed e.g. railways now have signs about implied consent to enter being withdrawn e.g. for antisocial behaviour. Any implied consent to go on and use the airport being withdrawn for the people described as D.
28. KH submitted that the Claimant’s case was that trespass is sufficient for the entirety of the relief sought but the Claimant had also pleaded private and public nuisance at Skeleton Argument paragraphs 29-31.
29. J indicated he was familiar with those causes of action from *HS2*.

### **Principles for Relief**

30. KH referred to a number of cases, including *Valero Energy Ltd & ors v Persons Unknown* [2024] EWHC 134 (KB). There was discussion in relation to the nature of the injunction being sought (interlocutory vs. final injunctions) since *Wolverhampton* and in the context of LCY. J wondered whether in this sort of case with unknown Ds, the difference between final injunction after review and interlocutory is a distinction without a difference.

31. KH suggested that approach was vindicated by *Wolverhampton* at para 143(vii), which supports the LCY approach of no return date but review. KH offered that a return date could be included on an Order (if made) if the Court considered that appropriate.
32. KH drew attention to the Skeleton Argument for the case law and tests. KH submitted that the principles applied, the Claimant had a clear cause of action (trespass + nuisance) and realistic prospect of success. There was a serious issue to be tried. Footnote 3 of the Skeleton Argument deals with the s.12(3) of the Human Rights Act 1998. Even if there is a higher test of ‘likely to be granted’ that was satisfied in any event. Damages are clearly not adequate as a remedy. There is a real and imminent threat.
33. KH informed J that in addition to LCY, the Claimant was also aware of a recent Order by HHJ Coe KC in respect of Manchester/Stansted/East Midlands Airports on 5 July. The papers only seemed to be published that morning, so there had not been a chance to read all the papers in full, but as part of the duty of full and frank disclosure, KH highlighted some differences.
34. J asked if the injunctions had been granted for similar reasons, i.e. the campaign of action proposed for the summer.
35. KH confirmed that was her understanding. [A printed bundle of papers relating to those injunctions was handed up]. KH drew attention to (1) the different way in which the Defendants were defined, and explained why the Claimant had adopted the approach it had (avoiding subjective purposes / state of mind); (2) the inclusion of Extinction Rebellion within the definition of the Defendants, noting that this was covered off in the Claimant’s definition which referred to ‘other environmental campaign’ and (3) that the Claimant’s proposed description did not refer to protest (which was referred to in the description of the Ds in those Orders) and why that was. J noted that this was private land, and there was not a right to protest on private land, referencing *HS2* and the Strasbourg Court in *Appleby v United Kingdom* [2003] 27 EHRR 38.
36. KH then drew attention to paragraph 3 of the Manchester/Stansted/East Midlands Order which was very prescriptive, and explained why the Claimant did not consider that was needed in this case, and also highlighted that the claimants in that case had applied for alternative service rather than to dispense with service, which would be addressed later.

37. J noted that Orders in such cases will each turn on its own facts, and that he wasn't sure how helpful it would be to go through those papers further, noting that the Claimant would be reflecting on those cases and would no doubt bring anything to the Court's attention pursuant to the duty of full and frank disclosure, in the event that the Order was made, and the Claimant needed to come back, rather than trying to deal with it 'on the fly'.
38. KH finished on that point but highlighting the key point was in that case there had been some points about highways which was not the case here.
39. KH then directed J to Skeleton Argument paragraph 14, and submitted that the evidence makes out a compelling need for the Order. The act the Claimant seeks to prohibit is directly related to the tort, clear and precise, all the tests are met. It's a very simple injunction with no difficulty for people to understand. There are clear geographical (the perimeter) and temporal limits.
40. J asked the time period being sought, and noted that 5 years with annual review had been granted on the LCY injunction.
41. KH confirmed the Claimant also asked for 5 years with annual review.
42. J said that absent any evidence these protests will go away, and quite the reverse whatever the rights or wrongs of that, he did not think 5 years was unreasonable.
43. KH then turned to the final tests. KH submitted that this is private land regarding the Human Rights Articles as already indicated; the Claimant was not a public authority and even if it was, the balancing act from all recent cases very clearly comes out for the Claimant, addressing those points pursuant to the duty of full and frank disclosure.
44. J noted that nothing in the Order stops protests on public land (subject to blocking traffic, etc.) but they just cannot be on private land. KH commented that it would only be in an extreme case where the essence of the right of free speech or assembly was barred or effectively destroyed that the Articles could be a defence if it was private land.

45. KH then addressed service, highlighting that the Claimant's approach was similar to LCY based on *Wolverhampton* at paragraph 56. The Claimant proposed to dispense with service and to notify persons potentially affected by the Order. KH directed J to where this was dealt with in the Claimant's witness evidence too (specifically, paragraph 56, HB311). The Claimant had to satisfy J of this being effective. The Claimant considered the arguments did so. The backdrop is at [230]-[231] of *Wolverhampton*.

46. J asked if there were any identified individuals.

47. KH confirmed that there were not, and directed J to the evidence in relation to that at HB310, paragraphs 51-53. Enquiries continued. The Claimant was aware of its obligations.

### **Full and Frank Disclosure**

48. KH ran through the points set out in the Skeleton Argument.

49. J noted that some of these points have been run elsewhere without success, including in *HS2*— a good evidential base and fear, doesn't mean you have to wait for action to start.

### **The Order**

50. KH and J then reviewed the Order, with particular reference to:

- a. Date. Until...9 July 2029 but (3) should say 'reviewed annually on each anniversary';
- b. Proposals for notification of the Order, by particular reference to Plan B at Schedule 4. J queried whether this included any locations at tube stations, as it seemed to him that some people wanting to go to the airport to protest would go by tube. KH explained why notices at the red dots were proposed and confirmed that notices could be put (voluntarily) where people at access from public transport. JL explained that notices would need to be within the Claimant's land. It was not practically possible to show locations on the Plan. J noted that

provided the Claimant put the documents at least at the red dot locations, there was nothing to stop the Claimant putting notice elsewhere;

- c. The Warning Notice at Schedule 5;
- d. The Undertakings in Schedule 1 which should include an undertaking to notify the Defendant by a specified date. LCY Order provided for 4 days. KH offered to do the same.

51. KH highlighted a small point re Plan A, in that it appeared some land within the boundary was not shaded yellow when it probably should be. But we say this does not make a difference to the area of control, i.e. the purple line.

52. J said he would grant the order subject to amendments discussed for reasons set out in Skeleton Argument.

Hearing ended 15:20.

**IN THE HIGH COURT OF JUSTICE**

**Claim No: KB-2024-002210**

**KINGS BENCH DIVISION**

**Before The Honourable Mr Justice Julian Knowles**

**BETWEEN:**

**HEATHROW AIRPORT LIMITED**

**-and-**

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR  
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN  
(WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW  
AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE  
PARTICULARS OF CLAIM**



**Defendants**

---

**ORDER**

---

**PENAL NOTICE**

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

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

**IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN**



**This Order prohibits you from doing the acts set out in this Order. You should read it carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.**

**UPON** the Claimant having issued this Claim by a Claim Form dated 7 July 2024

**AND UPON** hearing the Claimant's application for an interim injunction by Application Notice dated 7 July 2024

**AND UPON READING** the Witness Statements of Akhil Markanday dated 6 July 2024 and Jonathan Daniel Coen dated 7 July 2024

**AND UPON HEARING** Leading Counsel and Junior Counsel for the Claimant

**AND UPON** the Claimant giving and the Court accepting the undertakings set out in Schedule 1 to this Order

**IT IS ORDERED THAT:**

**INJUNCTION**

1. Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 ("Plan A").
2. In respect of paragraph 1, the Defendants must not (a) do it himself/herself/themselves in any other way (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
3. The injunction set out at paragraph 1 of this Order shall be reviewed annually 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 1 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing.

**VARIATION**

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.
5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimant has liberty to apply to vary this Order.

#### **SERVICE AND NOTIFICATION**

7. Service of the Claim Form, the Application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024 will be notified to the Defendants by the Claimant carrying out each of the following steps:
  - 8.1 Uploading a copy on to the following website: [www.heathrow.com/injunction](http://www.heathrow.com/injunction)
  - 8.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made and that the documents can be found at the website referred to above.
  - 8.3 Either affixing a notice at the locations shown marked with a red dot on the second plan attached to this Order at Schedule 4 ("Plan B") setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9.4 below.

9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to the Defendants by the Claimant carrying out each of the following steps:
  - 9.1 Uploading a copy of the Order on to the following website:  
[www.heathrow.com/injunction](http://www.heathrow.com/injunction)
  - 9.2 Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
  - 9.3 Affixing a copy of the Order in A4 size in a clear plastic envelope at each of the locations shown with a red dot on Plan B.
  - 9.4 Affixing warning notices of A2 size at those locations marked with a red dot on Plan B, substantially in the form of the notice at Schedule 5.
10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to the Defendants of any further applications shall be effected by the Claimant carrying out each of the following steps:
  - 10.1 Uploading a copy of the application on to the following website:  
[www.heathrow.com/injunction](http://www.heathrow.com/injunction)
  - 10.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
  - 10.3 Affixing a notice at these locations marked with a red dot on Plan B stating that the application has been made and where it can be accessed in hard copy and online.
11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to the Defendants may be effected by carrying out the steps set out in paragraphs 10.1 and 10.2 only.

12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8.3, 9.3 and 10.3, effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

#### **FURTHER DIRECTIONS**

14. Liberty to apply.

#### **COSTS**

15. Costs reserved.

#### **COMMUNICATIONS WITH THE CLAIMANT**

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

- (1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,  
London EC4R 0BR [akhil.markanday@bclplaw.com](mailto:akhil.markanday@bclplaw.com) / +44 20 3400 4344

- (2) Phil Spencer

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,  
London EC4R 0BR [phil.spencer@bclplaw.com](mailto:phil.spencer@bclplaw.com) / +44 20 3400 3119

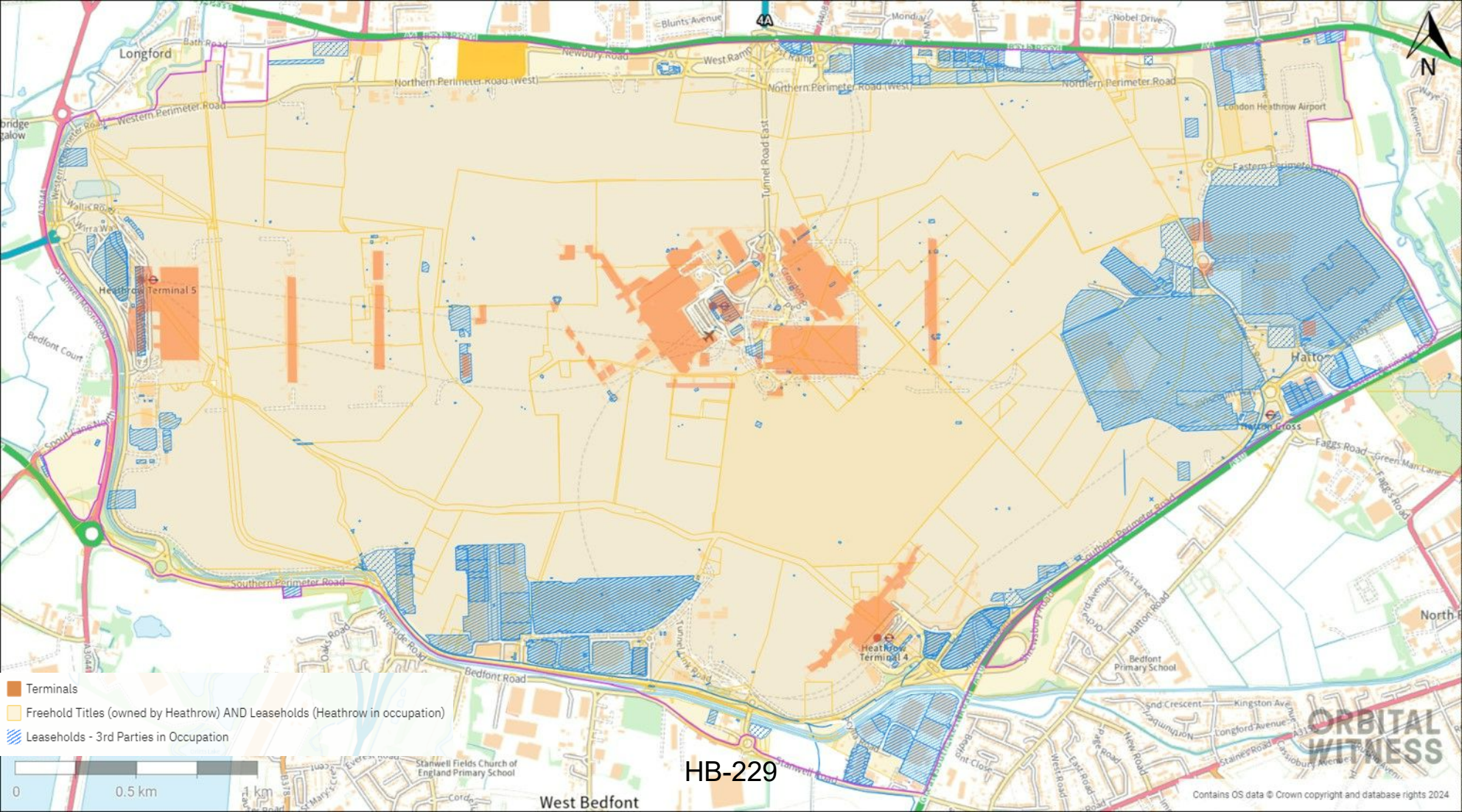
**Dated: 9 July 2024**

### **SCHEDULE 1 – UNDERTAKINGS**

1. The Claimant will take steps to notify Defendants of the Claim Form, Application Notice, evidence in support, the Order and a Note of the Hearing on 9 July 2024 as soon as practicable and no later than 5pm on 15 July 2024.
2. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

## **SCHEDULE 2 – PLAN A**





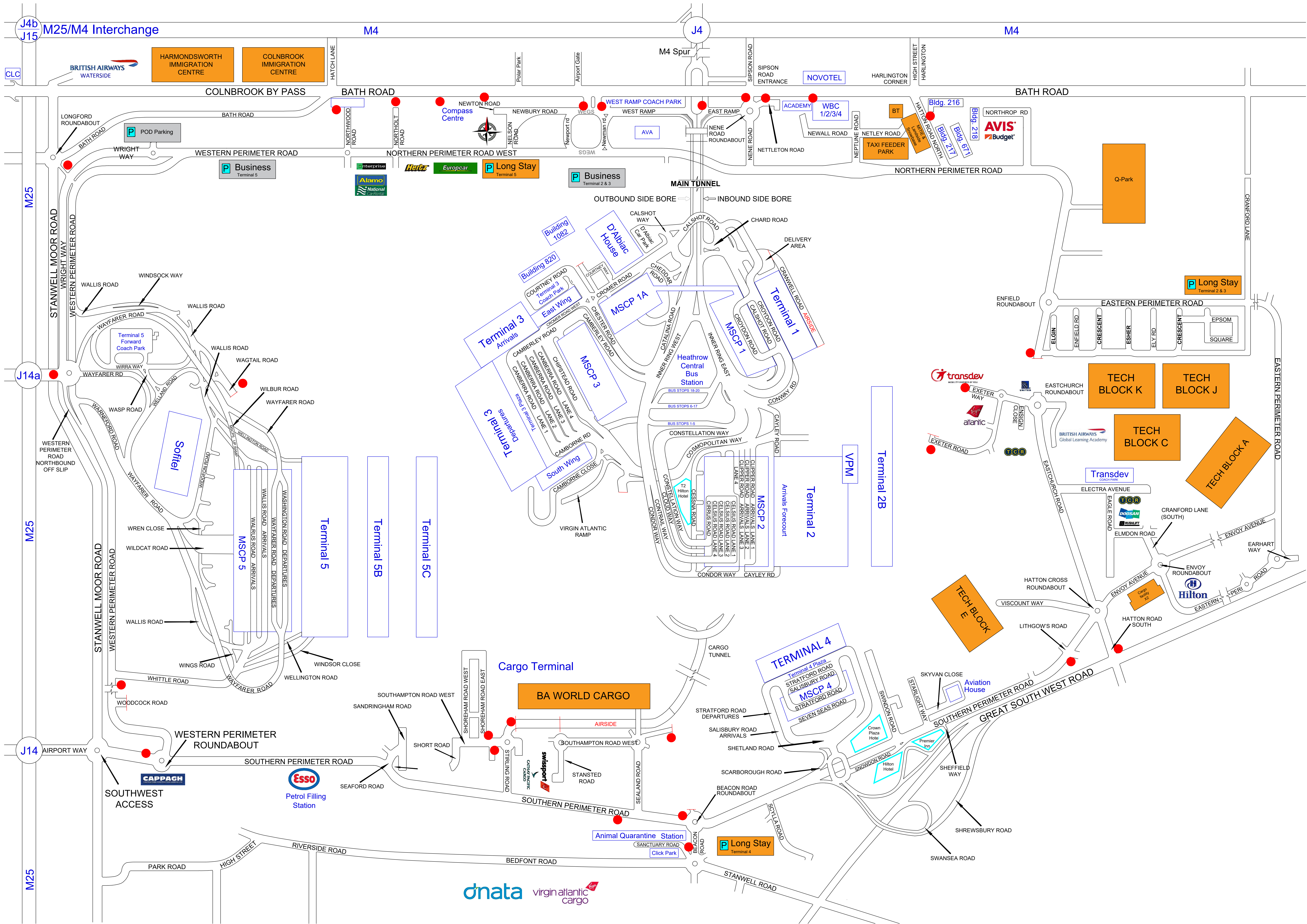
- Terminals
- Freehold Titles (owned by Heathrow) AND Leaseholds (Heathrow in occupation)
- Leaseholds - 3rd Parties in Occupation

### **SCHEDULE 3 – EMAIL ADDRESSES**

1. [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
2. [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
3. [info@juststopoil.org](mailto:info@juststopoil.org)

## **SCHEDULE 4 – PLAN B**



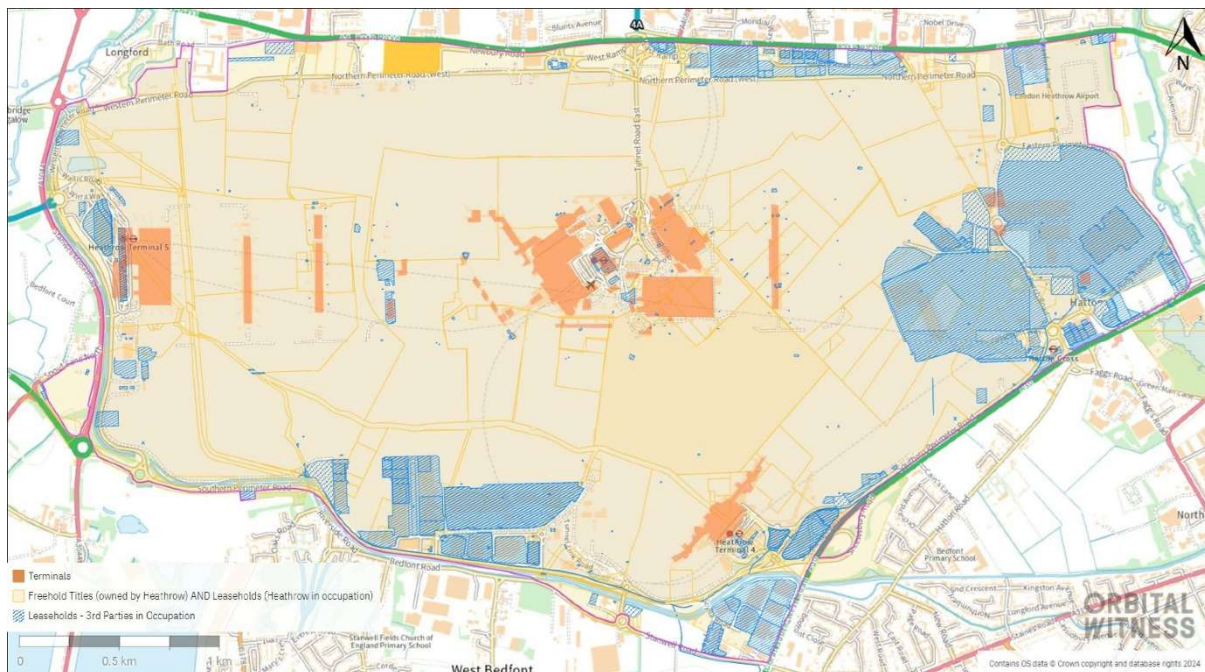




**SCHEDULE 5 – NOTICE**  
**WARNING – NOTICE OF COURT INJUNCTION**

**A HIGH COURT INJUNCTION granted in Claim No KB-2024-002210 granted on 9 July 2024 until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, now exists in relation to Heathrow Airport. The injunction means you may NOT without the express consent of HEATHROW AIRPORT LIMITED:**

**IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN ENTER, OCCUPY OR REMAIN UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE PLAN BELOW:**



**ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED, OR HAVE THEIR ASSETS SEIZED.**

A copy of the legal proceedings (including the Order, Claim Form, Application Notice, evidence in support and a note of the hearing on 9 July 2024) can be viewed at [www.heathrow.com/injunction](http://www.heathrow.com/injunction) or obtained from:

- (1) Compass Centre, Heathrow Airport, Nelson Road, Hounslow TW6 2GW, which is open between 9am-5pm Monday-Friday; or
- (2) Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR (Reference: AMRK/PSPE/20H0904.000140; Telephone: 020 3400 3119).

Anyone notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. The address of the Court is the Royal Courts of Justice, Strand, London WC2A 2LL.