

Party: Claimants  
Name: A Wright  
Number: First  
Date: 11.06.26  
Exhibits:  
"AJW1 – AJW24"

**CLAIM NO: KB-2024-002132**

**IN THE HIGH COURT OF JUSTICE**

**KING'S BENCH DIVISION**

**B E T W E E N**

**(1) MANCHESTER AIRPORT PLC  
(2) AIRPORT CITY (MANCHESTER) LTD  
(3) MANCHESTER AIRPORT CAR PARK (1) LTD  
(4) STANSTED AIRPORT LTD  
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD**

**Claimants**

**- v -**

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

**Defendants**

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**WITNESS STATEMENT OF**

**ALEXANDER JAMES WRIGHT**

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

**1. INTRODUCTION**

- 1.1 I am a Legal Director in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants. I am duly authorised to make this statement on the Claimants' behalf.
- 1.2 Save where otherwise stated, the facts contained in this statement are within my own knowledge and belief and, where they are not, I refer to the source of that information.
- 1.3 The documents to which I shall refer in the course of this statement are to be found in the exhibits marked "**AJW1 – AJW24**".
- 1.4 On 5 July 2024, Her Honour Judge Coe KC granted injunctions to restrain the Defendants from entering, occupying or remaining on Manchester Airport, Stansted Airport and East Midlands Airport until varied, discharged or extended by further order ("**the 2024 Orders**") – copies of which are exhibited at **Exhibit AJW1**.
- 1.5 Paragraph 4 of the 2024 Orders provided for each of those injunctions to be reviewed by the Court periodically at intervals not exceeding 12 months.

- 1.6 The first review hearing was heard on 24 June 2025 (“**the First Review Hearing**”) and the injunctions granted pursuant to the 2024 Orders were continued for a further 12 months by Orders dated 24 June 2025 of Bourne J (“**the 2025 Orders**”) – copies of which are exhibited at **Exhibit AJW2**.
- 1.7 I make this witness statement for the purposes of the second annual review hearing which has been listed to be heard on 30 June 2026.
- 1.8 This witness statement supplements:
- 1.8.1 the witness statement of David McBride dated 4 July 2024 made on behalf of the First Claimant (“**the David McBride Statement**”);
  - 1.8.2 the witness statement of Stuart Wortley dated 4 July 2024 (“**the First S Wortley Statement**”); and
  - 1.8.3 the witness statements of Stuart Wortley dated 6 June 2025 (“**the Second S Wortley Statement**”) and 16 June 2025 (“**the Third S Wortley Statement**”) which were both made on behalf of the Claimants for the purposes of the First Review Hearing (together with the First S Wortley Statement, “**the S Wortley Statements**”).

2. **BACKGROUND**

- 2.1 The background to these proceedings is more particularly set out in the David McBride Statement and the S Wortley Statements.
- 2.2 For present purposes it is sufficient to note that the injunctions were sought and obtained:
- 2.2.1 to protect Manchester Airport, Stansted Airport and East Midlands Airport against the threat of direct/unlawful protest activity; and
  - 2.2.2 a number of injunctions were granted in similar terms in respect of various airports across the country between 20 June and 14 August 2024 – such injunctions being:

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

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

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

### 3. **THE 2024 ORDERS AND THE 2025 ORDERS**

- 3.1 The 2025 Orders are substantively on the same terms and provide:
- 3.1.1 at paragraph 1, that the 2024 Orders "*shall remain in full force and effect, subject to the variations thereto set out in the schedule to this order (and subject to review, as provided for in paragraph 3 of the Knowles J Order)*"; and
- 3.1.2 at paragraph 2 for a variation to paragraph 4 of the 2024 Orders.
- 3.2 The 2024 Orders, as varied by the 2025 Orders, are substantively on the same terms and provide:
- 3.2.1 for the injunction to take "*immediate effect*" and until "*unless varied, discharged or extended by further order...*"; and
- 3.2.2 at paragraph 4:
- "This Order is subject to periodic review by the Court on application by the Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day"*.
- 3.3 The 2026 review hearing is listed to be heard on 30 June 2026, being a date which complies with the requirements of the 2025 Orders and the 2024 Orders (as varied).
- 3.4 I will file and serve a further witness statement confirming the steps taken by the Claimants to file and serve the Claimants' evidence and additional documents ahead of the 2026 annual review hearing.

### 4. **SERVICE OF THE 2025 ORDERS**

- 4.1 The 2025 Orders, in so far as they relate to Manchester Airport, Stansted Airport and East Midlands Airport, were served in accordance with paragraph 10 of the 2024 Orders by:
- 4.1.1 a copy of the relevant 2025 Order being uploaded to each of the individual airports' injunction websites. I have been informed by David McBride of Manchester Airports Group (to which Manchester Airport, Stansted Airport and East Midlands Airport belong) that a copy of the relevant 2025 Order was uploaded by a relevant member of staff to each of the individual airports' injunction websites on 30 June 2025. Printouts from each of the individual airports' injunction websites are exhibited at **Exhibit AJW4**, confirming that a

copy of the relevant 2025 Order was uploaded and continues to be available on those websites; and

- 4.1.2 the continuing presence of warning notices at the locations marked with an "X" on the plans to the 2024 Orders (being the plans at **Exhibit AJW5**), which I cover further below at paragraph 4.4; and
  - 4.1.3 whilst not strictly required under the terms of the 2024 Orders, affixing a copy of the 2025 Orders at the locations marked with an "X" on the plans to the 2024 Orders (being the plans at **Exhibit AJW5**). I have been informed by David McBride that a copy of the 2025 Order was so affixed at the relevant locations for each of the individual airports during the course of the week commencing 30 June 2025
- 4.2 In addition to the above steps, paragraph 10 of the 2024 Orders required a copy of the 2025 Orders to be served by an email sent to each of the email addresses listed in Schedule 3 to the 2024 Orders. During the course of preparing this witness statement and for the second annual review hearing more generally, I was unable to locate a copy of such an email on this firm's file for these proceedings. I therefore subsequently:
- 4.2.1 instructed relevant colleagues to carry out a search of our document management system and the email accounts of Stuart Wortley (who had conduct of these proceedings on behalf of the Claimants at the time of the First Review Hearing but who has since left my firm) and Emma Payne (who assisted Mr Wortley at the time and who has also since left my firm) for such an email and have been informed that such an email could not be located; and
  - 4.2.2 spoke with Mr Wortley by telephone on 9 June 2026 to discuss the matter of such an email further. Mr Wortley advised me that he could not readily recall sending such an email and that he would need to consult this firm's file to confirm matters.
- 4.3 As a consequence, I promptly served the 2025 Orders by email on 9 June 2026, a copy of which is exhibited at **Exhibit AJW6**.
- 4.4 I am told by David McBride, Head of Legal for the Manchester Airports Group (to which Manchester Airport, Stansted Airport and East Midlands Airport belong) that a regime is in place at each of the respective airports to ensure that the warning notices remain in place, that replacement warning notices are affixed as and when necessary and that warning notices continue to remain in place at the required locations – in accordance with the terms of the 2024 Orders.
5. **THE AIRPORT BYELAWS AND PLANS**
- 5.1 The injunctions granted in this action and in actions 4 and 6 in the table above were based on the relevant airport byelaws (and therefore extend to all of the land which is subject to the byelaws including land over which the Claimant(s) would not be entitled to legal possession – including for example highways land and areas which are demised to third parties).
- 5.2 The injunctions in this case currently extend to the land edged red on Plan 1 (Manchester Airport), Plan 2 (Stansted Airport) and Plan 3 (East Midlands Airport) to the 2024 Orders – a copy of the relevant plans are exhibited at **Exhibit AJW7**.
- 5.3 I am informed by David McBride, Head of Legal for the Manchester Airports Group and other members of his in-house legal team that:
- 5.3.1 the East Midlands Airport Byelaws 2001 have been replaced with the East Midlands Airport Byelaws 2025 – a copy of which is exhibited at **Exhibit AJW8**. I address the East Midlands Airport Byelaws 2025 more fully in the next section immediately below;

- 5.3.2 the Plan attached to the East Midlands Airport Order dated 5 July 2024 remains accurate; and
- 5.3.3 there have been no changes to the:
- 5.3.3.1 Manchester Airport Byelaws 2024 and that the Plan attached to the Manchester Airport Order dated 5 July 2024 remains accurate; and
- 5.3.3.2 Stansted Airport – London Byelaws 1996 and that the Plan attached to the Stansted Airport Order dated 5 July 2024 remains accurate.
- 5.3.4 third party occupiers within the ‘red line’ of the injunction order boundary will be informed ahead of the second annual review hearing that an application has been made to continue the injunction in respect of each of the relevant airports for a further 12 months.

## 6. THE EAST MIDLANDS AIRPORT BYELAWS 2025

- 6.1 A comparison of the East Midlands Airport Byelaws 2001 and the East Midlands Airport Byelaws 2025 has been undertaken and I attach as an Appendix to this witness statement a table detailing the relevant provision(s) in the East Midlands Airport Byelaws 2025 as against the equivalent provision(s) from the East Midlands Airport Byelaws 2001 as referred to in the David McBride Statement.
- 6.2 In addition to the above provisions, the following provisions of the East Midlands Airport Byelaws 2025 are considered relevant and applicable and I therefore draw attention to them:

3.34	<p><b>No unauthorised demonstrations, etc:</b></p> <p><i>No person shall organise or take part in any demonstration, procession or public assembly which has not been pre-notified to and pre-approved by the Airport Company and /or that in the opinion of a Constable or Airport Official could or could continue to obstruct or interfere with the proper use of the Airport or the safe or efficient use of the Airport by any person or organisation or which could or could continue to obstruct or interfere with the comfort, convenience and / or safety of passengers or persons using the Airport.</i></p>
3.15	<p><b>Wearing of passes</b></p> <p><i>No person, other than a bona fide airline passenger, while in a Restricted Area shall fail to wear a pass issued to them by or on behalf of the Airport Company so that it is clearly visible at all times.</i></p>
3.27	<p><b>Camp / Loitering</b></p> <p><i>No person shall camp on the Airport in a tent, trailer, caravan or otherwise, nor shall any person loiter, frequent or remain on the Airport without reasonable cause</i></p>
3.35	<p><b>No unauthorised flags or banners, etc:</b></p> <p><i>No person shall display any flags, banners or emblems which in the opinion of a Constable or Airport Official may cause or continue to cause offence or a breach of the peace on any part of the Airport, or which are likely to cause offence or a breach of the peace on any part of the Airport.</i></p>

3.36	<p><b>Access to Airport</b></p> <p><i>No person shall enter the Airport except for a bona fide purpose and no person shall remain at the Airport once that purpose has been discharged.</i></p>
3.37	<p><b>Persons required to leave</b></p> <p><i>No person shall remain on the Airport after being requested by a Constable or an Airport Official to leave. No Constable or Airport Official shall request a person to leave unless (a) that person has caused or is, in the reasonable opinion of the requesting Constable or Airport Official, about to cause a disturbance (including using language or making gestures which are lewd, foul or offensive), or (b) has committed or is, in the reasonable opinion of the requesting Constable or Airport Official, about to commit an offence (including a breach of these Airport Byelaws); or (c) after, having entered the Airport for a bona fide purpose, have completed their bona fide purpose for entering the Airport. Nothing in this paragraph shall prejudice the operation of other byelaws pertaining to the removal or evacuation of persons from the Airport.</i></p>
4.24	<p><b>Graffiti</b></p> <p><i>No person shall create graffiti upon any wall, structure, floor or pavement or any surface forming part of or used in relation to the Airport.</i></p>

6.3 As explained in the David McBride Witness Statement, at paragraph 26, there is no plan attached to the East Midlands Airport Byelaws 2001. There is a plan attached to the East Midlands Airport Byelaws 2025, the boundary of which is the same as the boundary shown on the plan attached to the East Midlands Airport Order dated 5 July 2024.

6.4 The Claimants will also re-amend paragraph 14 of the amended Particulars of Claim so as to refer to the provision in paragraph 3.34, 3.36 and 3.37 of the East Midlands Airport Byelaws 2025 and to update the amended Particulars of Claim so as to reflect the terms of the East Midlands Airport Byelaws 2025 more generally.

6.5 A formal application to make such re-amendment(s) will be made by the Claimants alongside or shortly following the filing/service of this witness statement.

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

7.1 The health and safety risks and risks of harm presented by direct/unlawful protest activity at the airports in question are detailed in the David McBride Statement. By way of summary, however, these include but are not limited to:

7.1.1 the Claimants' ability, at their respective airports, to ensure:

7.1.1.1 the safe operation of aircraft;

7.1.1.2 the safe movement of vehicles and persons on the runways / taxiways and other operational areas, to avoid collisions and damage to aircraft;

7.1.1.3 the ability of firefighting and rescue services to respond to incidents or accidents with the necessary urgency;

7.1.2 the inevitable delays or cancellations to scheduled flight arrivals and departures that direct/unlawful protest activity would bring, resulting in inevitable financial harm, operational disruption, and more general disruption and delay to members of the public;

- 7.1.3 the diversion of the Claimants' and wider public resources (e.g. police resources), which would be diverted as a matter of urgency into responding to any emergency caused by direct/unlawful protest activity; and
- 7.1.4 impacting counter-terrorism and police operations at the respective airports.
- 7.2 I understand from David McBride that the potential implications for counter-terrorism operations at the respective airports is of particular concern in the light of the recent raising of the terrorism threat level in the UK by the Joint Terrorism Analysis Centre, on 30 April 2026, from 'substantial' to 'severe' – meaning that "*an attack is highly likely*". The raising of this threat level is evidenced by the printout taken from MI5's website ([Threat Levels | MI5 - The Security Service](#)) which is exhibited at **Exhibit AJW9**.
- 7.3 In relation to such potential implications for counter-terrorism operations, I would draw attention to:
- 7.3.1 the previous evidence of David McBride, Head of Legal at Manchester Airport Group, in these proceedings as set out at paragraph 55 in the David McBride Statement:
- "55. All airports are a potential target for terrorist activity (which explains why the airport is routinely patrolled by police carrying firearms) meaning:-*
- 55.1. there is heightened security and any activity which is out of the normal is particularly dangerous. Any protest activity could be interpreted (whether correctly or not) by the security services at airports as a potential threat, meaning that the police or security services may intervene with significant knock-on effects. If the protestors pose no security or counter-terrorism threat, that would be a distraction for the police and our security team and a diversion of resources which are necessary for the counter-terrorism work they carry out to keep members of the public safe; and*
- 55.2 there is also always the potential that the protests are, or turn, violent or are, in fact, used as cover for actual terrorist attacks".*
- 7.3.2 the following comments of Ritchie J in his judgment in *Leeds Bradford Airport Ltd & Ors v Persons Unknown* [2024] EWHC 2274 (KB) (being his judgment from the hearing at which the 2024 Orders in action KB-2024-002317 were granted) at [30-31]:
- "30. Secondly, I need to look at the institutions which are bringing these applications. Airports are a part of the national infrastructure which are acutely sensitive to terrorist threats and are highly regulated in relation to safety, maintenance and security. They are also complicated organisations, involving the movement of thousands of members of the public, close to highly combustible materials and within fast-moving, huge pieces of equipment. Such organisations are acutely sensitive to chaotic disruption caused by unlawful direct action.*
- 31. I also take into account the fear, which I think is justified, of the Chief Executive Officers, that terrorism is facilitated by chaos..."*
- 7.3.3 the recent incident at Southend Airport, referred to further below at paragraph 14.2, which demonstrates, in my view, the heightened security concerns that there are at airports and how the activities of those at them can be interpreted by airport security services as a possible protest action, giving rise to a potential security threat – necessitating the need for energy and resources to be diverted in order to address them.

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

8.1 I am informed by David McBride, Head of Legal for the Manchester Airports Group that there have been no incidents of unlawful protests at Manchester Airport, Stansted Airport and East Midlands Airport since the 2025 Review Hearing. I have been informed by Rebecca Bainbridge, Senior Legal Counsel, and member of David McBride’s team that peaceful protests have been facilitated and held in the period since at Manchester Airport:

8.1.1 on 21 October 2025, by an individual protesting for PIA (Pakistan International Airlines); and

8.1.2 between 30 October - 2 November 2025, as part of industrial action against Aer Lingus.

8.2 I further understand from Ms Bainbridge that there is a planned protest by PETA (People for the Ethical Treatment of Animals) on 14 July 2026.

8.3 I exhibit at **Exhibit AJW10** a chronology of protest incidents since the 2025 Review Hearing which have targeted the oil and gas sector and organisations perceived to support or facilitate it ("**the Chronology**"), together with a printout of the relevant websites referenced within it for each incident – the source of which are noted in the Chronology. I would draw particular attention to:

Date	Location	Brief Details
03 July 2025	London	Extinction Rebellion supporters blockaded the entrance to the Energy Insurance London Conference.
05 July 2025	UK Wide	'Insure our Survival' Campaign: a seven-day environmental / anti-fossil fuels protest as part of Extinction Rebellion’s Summer of Action.
05 July 2025	London Oxford Airport	Extinction Rebellion supporters marched to the airport to draw attention to the number of private jets carrying what were asserted to be ultra-wealthy passengers.
07 July 2025	Various, UK	Members of Extinction Rebellion protested outside of different branches of insurance brokers, Marsh as part of the national day of action against insurance businesses.
09 July 2025	Inverness Airport	Protestors led by Extinction Rebellion Scotland protested outside the terminal to campaign against private jet company Blackbird Air.
09 July 2025	London	Extinction Rebellion supporters disrupted the British Insurance Awards by blocking the red carpet. Two activists were detained after getting into the venue and planning to take to the stage to drop a banner.
11 July 2025	Shrewsbury	Extinction Rebellion supporters targeted the offices of Marsh and Howden in an insurance-related protest relating to fossil fuels with protestors calling for the support of new projects to be ended.
16 July 2025	London	Extinction Rebellion supporters targeted AIG as part of the Insure Our Survival campaign.
21 July 2025	Reading	Two banners appeared above the A329 motorway reading "Your Planet Needs You" and "Tax The Rich". Extinction Rebellion claimed responsibility.

21 July 2025	Oxford	Extinction Rebellion supporters staged a 'crime scene' at Barclays, protesting about the bank financing the fossil fuel industry.
23 July 2025	London	Five Extinction Rebellion protestors dressed as scientists and occupied the lobby of Prudential Regulation Authority demanding capital requirements on fossil fuels in the insurance and banking sectors.
26 July 2025	Edinburgh	Ten Greenpeace activists arrested after suspending themselves from a bridge outside Edinburgh. They dangled themselves 25m above the water line, stopping a tanker delivering for 24 hours
28 July 2025	London	Fossil Free London activists dressed as robbers emblazoned with the Norwegian flag staged a "heist" at the Bank of England to highlight the "daylight robbery" that approval of the application for exploitation of the Rosebank oil field would entail.
22 August 2025	UK Wide	"Shut The System" announced that it is embarking on a "Summer of Sabotage" targeting businesses it considers to be the largest contributors to climate destruction.
05 September 2025	London	Three climate protestors from Climate Resistance were carried out after disrupting the Reform UK party conference.
08 September 2025	London	Extinction Rebellion announce its 'Insure Our Survival' campaign, set to run from 8-22 September with large-scale demonstrations planned, targeting companies that are enabling fossil fuel projects.
09 September 2025	London	Extinction Rebellion protestors staged protests at the London offices of AXA and AIG, blocking access to the buildings.
15 September 2025	Reading	Extinction Rebellion activists held a "die-in" at Barclays Bank in Reading, where protestors lay on the ground to simulate death, to link the funding of fossil fuels projects with climate change and global deaths.
16 September 2025	Ipswich	Extinction Rebellion activists took part in a global demonstration against large insurance companies calling on the companies to stop funding fossil fuels.
18 September 2025	Stansted Airport	Two young people who spray-painted two private jets at Stansted Airport in June 2024 were found guilty of criminal damage at Chelmsford Crown Court. They had cut through the wire perimeter fence and sprayed paint onto two private jets as part of a Just Stop Oil protest, to demand the UK government to negotiate a treaty to phase out oil and gas by 2030.
22 September 2025	Glasgow	Extinction Rebellion held a protest outside of AXA's office accusing it of "keeping killers safe" by insuring or investing in, amongst other things, fossil fuel projects.
05 November 2025	London	Fossil Free London campaigners disrupted BP panel event at Simmons & Simmons LLP.
04 December 2025	London	Fossil Free London campaigners disrupted Oil Executive awards dinner in London with attendees including Shell, BP and Ithica Energy.

15 January 2026	London / Manchester	Environmental and humanitarian protestors rallied at Zurich offices demanding it drops contracts with Shell, Chevron, Maersk and General Dynamics.
19 January 2026	London	Extinction Rebellion staged a protest outside Macquarie Group Headquarters to protest against expansion at Farnborough Airport. Two activists occupied the entrance to the building unfurling a banner that calls for a ban on private jets and urged the investment firm to sever its connection to fossil fuels.
05 May 2026	London	Activists from Fossil Free London staged a protest outside Equinor's offices, piling life-sized body bags outside the building while one campaigner dressed as an oil executive stood on top of them.
06 May 2026	York	Protestors, claiming to be associated with Boycott Bloody Insurance, protested outside Aviva's boardroom in York whilst they had their AGM.
06 May 2026	London	Fossil Free London protested outside Shell HQ ahead of quarterly profits which are due to be announced on 7 May 2026.
07 May 2026	London	Climate activists disrupted Barclays shareholder meeting.

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

## 9. ENVIRONMENTAL / CLIMATE CAMPAIGN GROUPS

### 9.1 Just Stop Oil (JSO)

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

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

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

9.1.2 I note that:

9.1.2.1 the JSO website:

(a) states at various points that "*Just Stop Oil ended its street campaign in 2025*" and/or "*In 2024 Just Stop Oil successfully won its original demand of 'no new oil and gas' and on March 27th 2025 announced an end to the campaign of action. However, our supporters will continue to tell the truth in court, to speak out for our political prisoners and to help build what comes next*" – relevant screenshots, taken by my colleague Meghan Clifford on 3 June 2026, are exhibited at **Exhibit AJW11**;

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

*"!! New project alert !!*

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

*Take back POWER"*

A screenshot, taken by my colleague Meghan Clifford on 3 June 2026, showing this is exhibited at **Exhibit AJW12**.

(c) further states on its homepage that:

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

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

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

A screenshot, taken by my colleague Meghan Clifford on 3 June 2026, showing this is exhibited at **Exhibit AJW13**.

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

9.1.2.3 notwithstanding the above, the JSO website and affiliated social media channels (including Instagram, Facebook and Twitter) appear to remain active – as evidenced by the printouts, taken by my colleague Meghan Clifford on 3 June 2026, exhibited at **Exhibit AJW14**.

9.1.3 Noting the reference on the JSO homepage and link to the Take Back Power website, it strongly appears to me that Take Back Power is a successor to JSO and I refer also to an article in the Guardian newspaper from 25 April 2025, a copy of which is exhibited at **Exhibit AJW15**, which states:

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

## 9.2 Take Back Power

9.2.1 I became aware of the group in or around December 2025 when activists threw custard and apple crumble at a case containing the crown jewels at the Tower of London (an article, taken by my colleague Meghan Clifford on 3 June 2026, from Take Back Power's website on this incident is exhibited at **Exhibit AJW16**).

9.2.2 Take Back Power describes itself on its homepage as "a nonviolent civil resistance group in the UK. We aim to put the 99% in charge through citizen's assemblies. We are ordinary people from all walks of life who believe that in order to fix Britain, we have to tax the rich. And we don't think the rich should get a veto. We want the people to decide how we tax the rich through a legally-binding citizen's assembly – a House of the People. It's time for the 99% to have 99% of a say!" (a printout of Take Back Power's website, taken by my colleague Meghan Clifford on 3 June 2026, is exhibited at **Exhibit AJW17**).

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

**"What is Take Back Power?"**

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

**Why does Take Back Power engage in disruptive direct action?**

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

Relevant printouts, taken by my colleague Meghan Clifford on 3 June 2026, are exhibited at **Exhibit AJW18**.

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

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

Printouts, taken by my colleague Meghan Clifford on 3 June 2026, from the Take Back Power website covering the above incidents are exhibited at **Exhibit AJW19**.

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

- 9.2.5.1 there are private jet facilities at all of the subject airports and indeed at all of the airports which are the subject of the Claims;
- 9.2.5.2 the 'super-rich' are users, if not perceived users, of such facilities;
- 9.2.5.3 JSO and Extinction Rebellion activists have previously targeted private jet facilities at airports. I refer to:

- (a) the incidents referred to in the table above at paragraph 8.3 on:
- (1) 5 July 2025: Extinction Rebellion supporters marched to London Oxford Airport to draw attention to the number of private jets carrying ultra-wealthy passengers;
  - (2) 9 July 2025: Protestors led by Extinction Rebellion Scotland protested outside the terminal to campaign against private jet company Blackbird Air; and
  - (3) 19 January 2026: Extinction Rebellion staged a protest outside Macquarie Group Headquarters to protest against expansion at Farnborough Airport. Two activists occupied the entrance to the building unfurling a banner that calls for a ban on private jets and urged the investment firm to sever its connection to fossil fuels.
- (b) the previous incident at Stansted Airport, on 20 June 2024, which involved two Just Stop Oil activists unlawfully gaining entry to the airport and spray-painting two private jets – for which those involved were found guilty of criminal damage at Chelmsford Crown Court in September 2025, receiving (a) a five month custodial sentence suspended for twelve months; and (b) a six week custodial sentence suspended for eight months plus 20 days rehabilitative activity. It was reported that this necessitated extensive professional cleaning, at a cost of c.£12,000 (a copy of relevant articles taken from JSO’s website, printed out by my colleague Meghan Clifford on 3 June 2026, are exhibited at **Exhibit AJW20**); and

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

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

### 9.3 Extinction Rebellion

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

### 9.4 Fossil Free London

9.4.1 Fossil Free London’s website (fossilfreelondon.org) describes the protest group as “a climate justice organisation dedicated to disrupting the fossil fuel industry here in our city. Through direct action, strategic campaigning, and movement building, we challenge the social licence of elites and corporate polluters”. A screenshot, taken by my colleague Meghan Clifford on 3 June 2026, showing this page is attached at **Exhibit AJW21**.

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

9.5 Youth Demand

9.5.1 Youth Demand is the junior branch of JSO (formerly known as Youth Climate Swarm). I note that their website, like JSO's website, directs visitors to Take Back Power's website. A printout, taken by my colleague Meghan Clifford on 3 June 2026, from Youth Demand's website is exhibited at **Exhibit AJW22**.

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

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

10. **OTHER AIRPORT INJUNCTION PROCEEDINGS**

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

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

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

11. **WIDER INJUNCTION PROCEEDINGS**

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

<b>Claim Number</b>	<b>Property</b>	<b>Claimant(s)</b>	<b>Duration of Injunction</b>
QB-2022-001259	Shell Centre Tower	Shell International Petroleum Company Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review.  At the most recent review hearing on 17 October 2025 the Court continued the injunction.
QB-2022-001241	Shell Haven Site	Shell UK Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review.  At the most recent review hearing on 17 October 2025 the Court continued the injunction.
QB-2022-001420	Petrol filling stations	Shell UK Oil Products Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review.  At the most recent review hearing on 17 October 2025 the Court continued the injunction.
PT-2022-000303	Buncefield Oil Terminal and the Kingsbury Oil Terminal	United Kingdom Oil Pipelines Limited and West London Pipeline and Storage Limited	Final injunction granted until 20 October 2028 subject to annual review.  At the most recent review hearing on 13 November 2025 the Court continued the injunction.
QB-2022-000904	Pembroke oil refinery and jetties, Manchester oil terminal, Kingsbury oil terminal, Plymouth oil terminal, Cardiff terminal, Avonmouth terminal and Pembrokeshire terminal	Valero Energy Ltd, Valero Logistics UK Ltd and Valero Pembrokeshire Oil Terminal Ltd	Final injunction granted until 13 December 2028 or further order in the meantime following a hearing on 17 January 2024.  At the most recent review hearing on 16 February 2026, the Court continued the injunction.

QB-2022-001098	Fawley Complex, Hythe Terminal, Avonmouth Terminal, Birmingham Terminal, Purfleet Terminal, West London Terminal, Hartland Park Logistics Hub and Alton compound at Holybourne	Esso Petroleum Company Limited and Exxonmobil Chemical Limited	<p>Final injunction granted on 29 January 2024 until 11 July 2028 subject to annual review on 18 July of each year.</p> <p>At the most recent review hearing on 9 July 2025 the Court continued the injunction.</p> <p>A further review hearing has been listed to be heard on 22 July 2026.</p>
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**12. DETERRENT EFFECT OF THE INJUNCTIONS**

12.1 The Claimants continue to have no objection to protests which are lawful and do not interfere with others’ rights subject to those wishing to carry out a peaceful protest at the airports, making a request for the Claimants to designate an area for that purpose in accordance with the final recital in the 2024 Orders. In asking the Court to continue the injunctions granted by the 2024 Orders, the Claimants seek only to restrain direct/unlawful protest activity that goes beyond that which is peaceful and lawful and causes disruption to those seeking to go about their lawful business at the airports in question.

12.2 Noting the continued lack of direct/unlawful protest activity at the airports in question, alongside the incidents referred to within the Chronology, the Claimants infer that the protestors involved in these incidents (or some of them at least) have been careful to ensure that their unlawful behaviour has taken place at premises which are not protected by injunctions so that they are not at risk of proceedings for contempt of court. I would also draw attention to:

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

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

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

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

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

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

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

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

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

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

12.3.2 three JSO activists were found not guilty of causing a public nuisance in October 2025 by a jury for spraying Stonehenge with orange powder in 2024;

12.3.3 three JSO activists were found not guilty of causing a public nuisance in September 2025 after climbing gantries on the M25 in 2022;

12.3.4 eight JSO activists were found not guilty of intentionally or recklessly causing a public nuisance in August 2025 after blocking entrances to petrol stations in August 2022;

12.3.5 the jury at the initial trial of a JSO supporter in July 2025, who climbed a gantry on the M25 in November 2022, failed to reach a majority decision; and

12.3.6 five Palestine Action activists were cleared in February 2026 of aggravated burglary after Elbit Systems' (a UK subsidiary of an Israeli defence firm) was targeted on 6 August 2024. They were also charged with criminal damage and violent disorder but the jury reached partial or no verdicts on those counts. Four of the activists were subsequently found guilty of criminal damage at a retrial in May 2026.

Copies of news articles reporting on the above are exhibited at **Exhibit AJW23**.

13. **RESPONSE TO THE CLAIMS**

13.1 I can confirm that no acknowledgment of service, admission or defence has been received on behalf of the Defendants and that nobody has ever engaged with these proceedings.

13.2 I am informed by David McBride that the Claimants are not aware of the identity of any individuals who threaten to engage in direct/unlawful protest activity at their respective airports.

14. **FULL AND FRANK DISCLOSURE**

14.1 The Claimants are aware and mindful of their continuing duty to provide full and frank disclosure to the Court and consider that this duty has been complied with via the provision of this witness statement.

14.2 In accordance with that duty, I make reference to an incident at London Southend Airport on 8 June 2026, on which the text of a briefing note reporting on such incident, which was shared with Claire Acklam (Senior Legal Counsel of Leeds Bradford Airport) by Southend Airport's Head of Security, is exhibited at **Exhibit AJW24**. The briefing note states:

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

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

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

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

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

*clothing in the bags appeared old and the toiletries were mainly half used items and cheap non branded perfumes*

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

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

## 15. **CONCLUSION**

15.1 I am informed by David McBride that the Claimants' directors have concluded that they should respectfully request the Court to order that the injunctions remain in full force and effect, subject to a review in 12 months' time as provided by the 2024 Orders. I understand that they reached this decision after having considered carefully whether the threat of unlawful action has abated materially and having formed the view that it has not abated for the purposes of this year's review hearing given the evidence set out above, and in particular, the elevated terrorism threat level. If the injunctions are continued in full force and effect, subject to a review in 12 months' time, the Claimants will reassess matters afresh next year.

15.2 The impact of climate change continues to be firmly on the public agenda, continues to attract strong feelings and is still a subject about which campaigners are willing to contemplate disruptive action. The inference drawn by the Claimants (and by me) is that the injunctions granted over time have influenced the pattern of protest, with disruptive action being focused principally on targets which do not have the benefit of the Court's protection by way of injunction. The Claimants therefore remain very concerned that protest groups, including but not limited to those referred to in this witness statement, will undertake disruptive direct action by way of trespass at the subject airports and/or causing a private or public nuisance on or around them if the injunctions were now to be lifted.

15.3 As is clear from the evidence, any such disruptive direct action would cause significant harm. There would be an impact on the Claimants' operations, the operations of the airlines and businesses operating from them, the travelling public as well as the associated financial impact for all concerned.

15.4 The Claimants consider that the injunctions have had a deterrent effect and prevent the irreparable and serious potential harm that might be caused should the Defendants undertake any direct/unlawful protest activity in or around their respective airports. It is for this reason that they seek the injunctions remain in full force.

15.5 The risks are especially acute at this time of year: most of the incidents in which UK airports were targeted by environmental protestors in 2024 occurred between late June and August 2024 - the busiest period for holiday travel.

## 16. **NOTICE OF THE REVIEW HEARING**

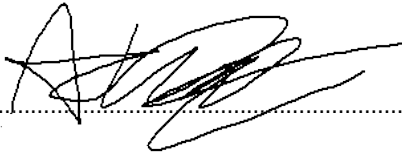
16.1 The Claimants intend to give notice of the review hearing in the manner provided for in paragraph 5 of the 2024 Orders – namely by:

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

- 16.1.2 sending copies of the documents referred to in the previous paragraph to the email addresses referred to in Schedule 3 to the 2024 Orders plus the following additional email addresses:
- 16.1.2.1 [info@takebackpower.net](mailto:info@takebackpower.net) and [press@takebackpower.net](mailto:press@takebackpower.net) which are understood to be linked to Take Back Power;
  - 16.1.2.2 [shut\\_the\\_system\\_info@proton.me](mailto:shut_the_system_info@proton.me), which is understood to be linked to Shut the System;
  - 16.1.2.3 [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org) and [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org) which are understood to be linked to Fossil Free London; and
  - 16.1.2.4 [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com) and [youthdemand@proton.me](mailto:youthdemand@proton.me), which are understood to be linked to Youth Demand.
- 16.1.3 affixing a notice at each of the warning notice locations at each airport referring to the time and date of the review hearing and explaining where copies of the additional papers can be found and obtained in hard copy.

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

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



**Alexander James Wright**

**Legal Director, Eversheds Sutherland (International) LLP**

**11 June 2026**

## Appendix 1

East Midlands Airport Byelaws 2001		East Midlands Airport Byelaws 2025	
3(15)	<p>No person shall in the airport intentionally obstruct:- (a) any airport official in the proper execution of his duties; (b) any person carrying out an act which is necessary to the proper execution of any contract with the company; or (c) any other person in the proper use of the airport, or behave so as to give reasonable grounds for annoyance or offence to other persons in the airport.</p>	3.10	<p><b>Obstruction and Interference</b></p> <p>No person shall intentionally or recklessly obstruct or interfere with the proper use of the Airport or with any person acting in the execution of their duty in relation to the operation of the Airport or pursuant to any applicable legislation, including the conveyance of passengers, their baggage and other goods, the security and safety of passengers, and the maintenance and servicing of Aircraft.</p>
		4.13	<p><b>Not to cause annoyance</b></p> <p>No person shall sing, dance, shout, play a musical instrument, operate a Portable Entertainment Device, use a laser pen or otherwise behave in such a way as to give reasonable cause for annoyance to any other person and no person shall fail to cease such activities when reasonably requested by an Airport Official or Constable.</p>
3(12)	<p>No person shall remain on the airport, or any part thereof, after having been requested by an airport official or a constable 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 or that that person's removal is required on grounds of fire, other dangers or security at the airport.</p>	3.37	<p><b>Persons required to leave</b></p> <p>No person shall remain on the Airport after being requested by a Constable or an Airport Official to leave. No Constable or Airport Official shall request a person to leave unless (a) that person has caused or is, in the reasonable opinion of the requesting Constable or Airport Official, about to cause a disturbance (including using language or making gestures which are lewd, foul or offensive), or (b) has committed or is, in the reasonable opinion of the requesting Constable or Airport Official, about to commit an offence (including a breach of these Airport Byelaws); or (c) after, having entered the Airport for a bona fide purpose, have completed their bona fide purpose for entering the Airport. Nothing in this paragraph shall prejudice the operation of other byelaws pertaining to the removal or evacuation of persons from the Airport.</p>
		3.38	<p><b>Person not to return for 24 hours</b></p> <p>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, unless such re-entry is authorised in writing by the Constable or Airport Official issuing the</p>

			<i>original request to leave (or in their absence the Airport Company).</i>
3(14)	<i>No person shall enter the airport (except as a bona fide airline passenger) whilst having been prohibited from entering by a constable or an airport official.</i>	3.39	<p><b>Prohibited Persons</b></p> <p><i>No person shall enter the Airport whilst having been temporarily or permanently prohibited from doing so by the Airport Company. A person who has either:</i></p> <p><i>(a) in the opinion of the Airport Company acted in breach of these byelaws, or committed any other offence on Airport premises or involving the Airport's activities or operations; or</i></p> <p><i>(b) been issued with a caution by the police in respect of such an offence;</i></p> <p><i>may be excluded from the Airport permanently or for a set period of time, such exclusion to be determined by the Airport Company at its discretion and set out in writing by the Airport Company to the person.</i></p>
3(18)	<i>No person shall obstruct any of the emergency exits at the airport.</i>	3.13	<p><b>Emergency Exits</b></p> <p><i>No person shall obstruct or tamper with any of the emergency exits at the Airport</i></p>
4(3)	<i>No person on foot, or whilst driving or propelling a vehicle, shall, except as reasonably necessary in the case of an emergency, neglect, fail or refuse to comply with an indication or direction given by a constable or an airport official or by a notice or sign exhibited by order of the company where the indication, direction or notice is given or erected for the purpose of preventing an obstruction within the airport, of regulating vehicular traffic within the airport, prohibiting or restricting access to any part of the airport or avoiding a danger to any persons or property.</i>	3.25	<p><b>Compliance with Signs or directions</b></p> <p><i>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.</i></p>
5(7)	<i>No person shall fail to comply with any notice prohibiting or restricting access to any building, road or any part of the airport.</i>	4.10	<p><b>Prohibition Notice</b></p> <p><i>No person shall fail to comply with any Sign prohibiting or restricting access to any building, road, or any part of the Airport.4.11</i></p>
5(8)	<i>No person shall climb any wall, fence, barrier, railing or post.</i>	4.11	<p><b>Climbing etc.</b></p>

			<i>No person shall climb any wall, fence, barrier, railing or post.</i>
5(10)	<i>No person shall erect or use any apparatus for transmission, receipt, recording reproduction or amplification of sound, speech or images.</i>	4.14	<p><b>Apparatus</b></p> <p><i>No person shall erect or use any apparatus for transmission, receipt, recording, reproduction or amplification of sound, speech or images for:</i></p> <p>4.14.1 commercial purposes; or</p> <p>4.14.2 for any purpose in a Security Search Area or at Border Force controls.</p>
5(11)	<i>No person shall enter or leave the airport otherwise than through a gate or entrance for the time being provided by the company for that purpose.</i>	4.17	<p><b>Entering or leaving the Airport</b></p> <p><i>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.</i></p>
		4.12	<p><b>Cutting or destroying etc</b></p> <p><i>No person shall cut, damage, or destroy any wall, fence, barrier, railing or post located on or within the Airport.</i></p>
5(12)	<i>No person shall enter any part of the airport to which members of the public are not for the time being admitted.</i>	4.16	<p><b>Restricted Access</b></p> <p><i>No person shall:</i></p> <p>4.16.1 enter any part of the Airport to which members of the public are not for the time being admitted;</p> <p>4.16.2 drive a Vehicle Airside elsewhere than in a place provided for the passage or accommodation of such a Vehicle;</p> <p>4.16.3 except in an emergency, enter or remain on any part of the Airport Company's premises which is marked by a Sign exhibited in a conspicuous position on or near such part of the premises as being not available for entry or for use; or</p> <p>4.16.4 with or without a Vehicle enter that part of the Airport known as the aircraft manoeuvring area without first obtaining the permission and clearance of Air Traffic Control.</p>
5(14)	<i>No person shall affix bills, advertisements, posters, notices or stickers upon any wall, structure, floor or pavement or any surface forming part of, or used in relation to, the airport, except on premises which the person so affixing is authorised to occupy and in accordance with</i>	4.19	<p><b>Display signs / signage:</b></p> <p><i>No person shall post, distribute or display any notice, advertisement, sign, circular or other written or printed matter, except on premises which the person posting, distributing or displaying it, is authorised</i></p>

	<i>the terms of his occupation thereof.</i>		<i>to occupy, and in accordance with the terms of their occupation thereof.</i>
7(3)	<i>No person shall without lawful authority or reasonable cause or excuse ... enter or climb upon, or attempt to enter or climb upon, any building at the airport not open to the public.</i>	4.11	<i>See 4.11 above.</i>
		4.16.1	<i>See 4.16.1 above.</i>
7(4)	<i>No person shall without lawful authority or reasonable cause or excuse ... enter or climb upon, any part of any aircraft without the authority of the person in charge of it or otherwise.</i>	4.2	<b>Entering Aircraft</b>  <i>No person except an Airport Official or Constable shall enter or climb upon an Aircraft without the written consent of the Aircraft owner or the Airport Company.</i>
		3.5	<b>Tampering with aircraft</b>  <i>No person shall move or use or tamper with any Aircraft or anything used in connection with any Aircraft without lawful authority or reasonable cause or excuse.</i>
7(5)	<i>No person shall without lawful authority or reasonable cause or excuse ... enter or get on or attempt to enter or get on any vehicle, truck, trolley or aircraft steps or tamper with the brake or other part of its mechanism.</i>	3.6	<b>Tampering with equipment</b>  <i>No person shall tamper with or misuse any mechanical, electrical or other apparatus used in connection with the operation of the Airport or the access of persons or Vehicles to any part of the Airport.</i>
		4.5	<b>Airport Equipment</b>  <i>No person shall operate, use, move or disturb any Airport equipment except with the written consent of, or at the instruction of, the Airport Company.</i>

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

1. **"Air Traffic Control"** means the service provided by air traffic controllers who direct Aircraft on the ground and through controlled airspace and can provide an advisory service of Aircraft in uncontrolled airspace;
2. **"Aircraft"** means a heavier than air power-driven flying machine and includes aeroplane (land plane), aeroplane (sea plane), aeroplane (amphibian), aeroplane (self-launching motor glider), powered lift (tilt rotor) and rotorcraft (helicopter and gyroplane);
3. **"Airport"** means the area of land constituting East Midlands Airport edged in redline on the plan attached at Schedule 1, including: all areas of the Airport accessible to the public, Airport users, third party suppliers and contractors and their personnel, all areas of the Airport accessible to Aircraft, including runways, taxiways, aprons and all grass areas;
4. **"Airport Company"** means East Midlands International Airport Limited (registered in England and Wales under company number 02078271) and any successor to it as airport operator (as that term is defined in the Airports Act 1986), 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;

5. "**Airport Official** means in relation to any matter, a person authorised to act on behalf of the Airport Company;
6. "**Airport Security Pass**" means a security pass issued by the Airport Company which grants Pass the holder authorised access to certain identified areas of the Airport, subject to the terms and conditions which accompany the Airport Security Pass;
7. "**Constable** means any person having the powers and privileges of a police constable, a traffic police community support officer or a police community support officer;
8. "**Sign** means any object or device (whether fixed or portable) for conveying warnings, information, requirements, restrictions, instructions or prohibitions of any description;
9. "**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 or passenger baggage