

CLAIM NO:

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

B E T W E E N

- (1) WM MORRISON SUPERMARKETS LIMITED**
- (2) SAFEWAY STORES LIMITED**
- (3) WM MORRISON PRODUCE LIMITED**

Claimants

- v -

- (1) PERSONS UNKNOWN AS DESCRIBED IN THE SCHEDULE 1 ATTACHED TO
THE CLAIM FORM**
- (2) PERSONS UNKNOWN AS FURTHER DESCRIBED IN THE SCHEDULE 1
ATTACHED TO THE CLAIM FORM**

Defendants

Exhibit AT3

This is the exhibit referred to in the First Witness Statement of Andrew James Todd dated 15 January 2025.

Signed:

Name: Andrew James Todd

Dated: 15 January 2025



***It's not just about Farmers,
it's about the Whole Country!***

Our Demands for the Farming Awareness Campaign

1. Abolish Inheritance Tax & Restore APR, BPR

- Eliminate inheritance tax for all people in the UK, ensuring families can pass down their businesses and legacies without punitive taxation.

2. Fairness in Food Pricing

- Address supermarket profiteering, ensuring farmers receive sustainable prices and consumers can afford quality groceries.

3. National Food Security

- Establish robust policies to protect and promote domestic food production. Dependence on imports undermines national security and risks supply chain disruptions. Local, sustainable farming must be supported to ensure consistent food availability for all.
- Guarantee that UK fishing waters remain under British control and ensure fair quotas that protect the livelihoods of British fishermen. Introduce measures to safeguard the sustainability of the fishing industry while reducing reliance on imported seafood.

Why does the Country need the Farmers To Action Group?

The government claims it must “fix the public finances,” but its actions have created a serious threat to national food security. Implementing policies like Inheritance Tax (IHT) that unfairly burden farmers and rural families, is undermining the very foundation of our domestic food supply.

The Farmers To Action group believe there is a better way. Instead of targeting those who feed the nation, the government must:

- **Reconsider Priorities:** Redirect focus from harmful taxation policies like IHT to sustainable economic solutions.
- **Stop Wasteful Spending:** Cut excessive foreign aid and halt questionable green projects, such as solar farms built on productive agricultural land. These projects jeopardise farming output and harm food security.

The Farmers to Action group is here to advocate for a fair and balanced approach that secures the future of farming, ensures national food security, and builds a sustainable, resilient economy for all.

Without farmers, there is no food. Without food, there is no future.
Together, we can protect our country's food security and farming future.



JANUARY 10TH 2025

STARTING 10:30AM

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ON OUR FUTURE EVENTS

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farmerstoaction We are just getting started...2025 Will Be The Year of Action!

Our Demands are Clear.

Our Farmers, Your Food, Everyone's Future. 🚗

We are not going to back down
@RachelReevesMP @Keir_Starmer
@SteveReedMP @10DowningStreet
@DefraGovUK

#farmerstoaction #farmersprotest
#farmer #OurFYourF
#EveryonesFuture

6 d



farmerstoaction @garethwynjones1

6 d Reply



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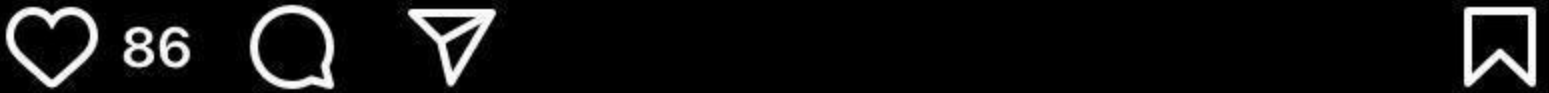
NATIONAL PROTESTS

**STARTING 10:00AM
JANUARY 10TH 2025**

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alanvibe Nationwide Tractor Protests are happening all over England, Wales & Scotland.

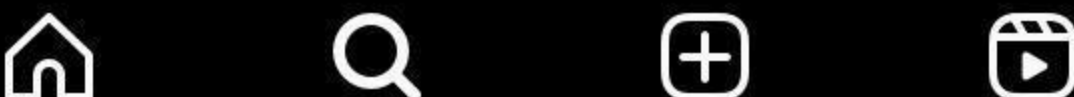
Following two days of action in Yorkshire and Oxford, Farmers To Action will take to the roads across the country to show what they think of @SteveReedMP DEFRA roadmap and @RachelReevesMP IHT Levy.

Our Farmers, Your Food, Everyone's Future. 🚜

#farmersprotest #farmers #farmerstoaction #together

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1 day ago



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Tractors take to streets in slow drive to urge councillors to reject Budget proposals

Farmers in Yorkshire vow to continue fight to stop Labour's family farm tax

Jane Thynne

🕒 07 January 2025 • 2 min read

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Image: Tractors will once again take to the streets in Yorkshire to protest at the Labour Budget

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Farmers protest outside Oxford Farming Conference

Defra Secretary Steve Reed had his speech disrupted by a chorus of tractor horns outside the Oxford Farming Conference

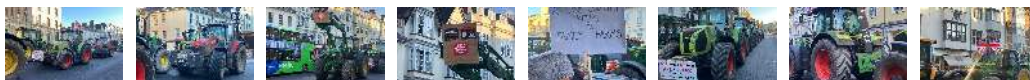
Chris Brayford

09 January 2025 • 3 min read

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Oxford Farming Conference protest



Farmers protesting outside Oxford Farming Conference



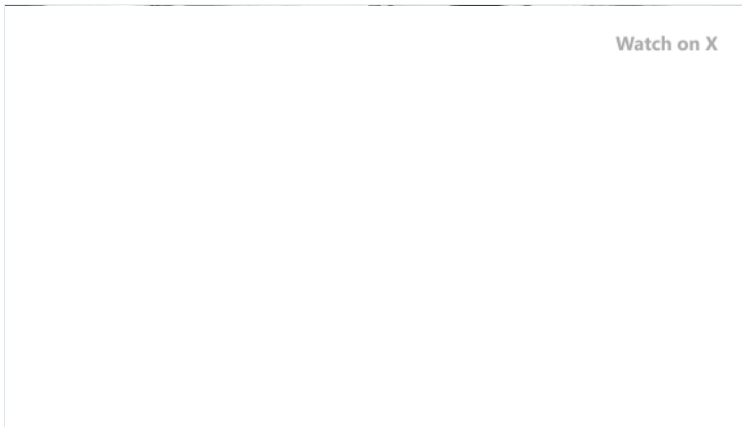
Farmers have held a protest outside the Oxford Farming Conference (OFC) to outline their concern about changes to Inheritance Tax in the Autumn Budget.

A group of local farmers had challenged Secretary of State Steve Reed to 'come out and talk to real farmers' ahead of his speech at the OFC on Thursday (January 9).

The Minister had appeared at the event to outline the Government's long-term vision for farming, promising to put more money back into the pockets of British farmers.

READ NOW: [Defra Secretary promises to put money back in farmers' pockets](#)

However, Mr Reed's speech was disrupted by farmers who loudly beeped their tractor horns outside the venue.



Tractors had driven into Oxford High Street with signs telling Labour to 'stop the farm tax' and urging the public to support British farming.

READ NOW: [Many farms will not survive to see the benefit of Defra's 'New Deal for farmers', says NFU](#)

It follows protests around the country, with more events planned in the coming weeks to drive home the message to politicians of the damage proposed changes to Inheritance Tax will have on the farming community.

James Wright, Conservative Rural Forum director of policy and Exmoor farmer said: "I am in Oxford with family farmers from across the country to send Steve Reed a clear message, Labour's Family Farm Tax does not add up.

"It threatens to devastate farms and our nation's food security.

"Steve Reed should come out, meet these farmers and listen to their concerns."

Mo Metcalf-Fisher, Countryside Alliance director of external affairs, said the Defra Secretary should talk to farmers rather than at them behind a podium; while adding that 'generations of farmers' are 'terrified' about their future.

"If the Treasury, Keir Starmer, Rachel Reeves, Steve Reed had actually spoken to farmers before they announced the family farm tax in the Budget, this would not be happening right now.

"There would not be pain and anxiety spreading throughout the countryside, families who have had farms in their families for generations terrified about the future, terrified about what it means for our nation's food security."

Councillor Liam Walker from Oxfordshire County Council is one of those in attendance.

"They are not very happy," he said, adding they were campaigning against the tax.

Watch on X

"I really want to send a message to him [Steve Reed] that the family farm tax should be scrapped. It is going to damage rural communities, rural farming and clearly the Government have said that this will only impact a few farms. Well, we have got more than a few farms here in Oxford today. There were more than a few farms in London."

READ NOW: [Inheritance Tax changes predicted to hit 19% more farmers due to inflation](#)

Mr Walker added farmers did not just put food on plates but were 'custodians of our land'.

"They are digging in, and what is making us nervous is the lack of ability to accept they have got this wrong," he said.

He added they would get a lot of credit for listening and U-turning.

"The fact that they are digging in, essentially ignoring farmers, I think is going to cause them more problems. They have got a lot of MPs rep rural communities, I think the next general election is going to be a key topic.

"Farmers will not forget this."

January 14: Farming in Five: Retailers speak out on family farm tax

Farming in Five by Farmers Guardian

00:00 | 04:21

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January 9: Farming in Five: Farmers protest outside Oxford Farming Conference	4:08	
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Save the date. 10th January 2025

L P · Dec 22, 2024

1 2 3 ... 8 Next ▶




L P
Member
Arable Farmer
Location: Newbury

Dec 22, 2024 #1

I've been asked to put it out that next steps are being paved for 10th January and are encouraged to be run locally. If you can coordinate amongst yourselves to get word out there to those in your localities to save the date and gather numbers. Cambridgeshire seemed rather devoid of participants on 19th... maybe the grain barons are comfortable? If someone might put their hand up to get organising in the area, PM me.

[Reply](#)

Pebd99, Chae1, spin cycle and 1 other person




yellow belly
Member
Location: south west lincolnshire

Dec 23, 2024 #2

date saved

[Reply](#)




farmerm
Member
Location: Shropshire

Dec 24, 2024 #3

What about this one on the 25th...

MSN

[Reply](#)



Sonoftheheir
Member
Arable Farmer
Location: West Suffolk

Dec 24, 2024 #4

farmerm said: ↻

What about this one on the 25th...

MSN

🤔 NFU organised?!

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Still Farming



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Farmers To Action

10 January at 15:13 · 🌐

Overview

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NEW Drone Footage of Tractors Campaigning outside Morrisons Middlewich Distribution Centre for Fair Pricing for Farmers & The Consumer!

Our Demands are Clear!

Our Farmers, Your Food, Everyone's Future See more

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Zara Pawley

Excellent. Morrisons do not sell GB fruit when in season. Rather bring from abroad. They say they support farmers, they don't.

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Kirst Munslow

Brilliant 🍌🍌🍌

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NEW Drone Footage of Tractors Campaigning outside Morrisons Middlewich Distribution Centre for Fair Pricing for Farmers & The...

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Tractor convoy in protest of farming tax change



Farmer Alan Hughes is taking part in the action in Shrewsbury

Alex James

BBC Radio Shropshire

Chloe Hughes

BBC News, West Midlands

10 January 2025

A convoy of more than 30 slow-moving tractors, organised by farmers, took place on the A5 in Shrewsbury.

The vehicles started at Halls Shrewsbury Livestock Auction Centre before driving repeatedly between the Dobbie's and Emstrey roundabouts in protest of changes to inheritance tax which were **announced in the government's budget.**

"It's the end really, farming is on its knees already," said Alan Hughes, a farmer near Leintwardine.

On Thursday Environment Secretary Steve Reed said he was "sorry" decisions had upset farmers but argued "stable finances are the foundation of the economic growth needed".

"I'm having to run two farm diversifications just to break even... any other industry would go mad if they were told you have to produce food at a loss and then run another business to pay yourself and feed your family," Mr Hughes said.

"We hope that there will be an abolishment of inheritance tax for all, not just farmers."



| More than 30 tractors are taking part in the convoy

A spokesperson said the government's commitment to farmers remained steadfast, and said it had committed £5bn to the farming budget over two years.

"Our reform to Agricultural and Business Property Relief will impact around 500 estates a year," they said.

"For these estates, inheritance tax will be at half the rate paid by others, with 10 years to pay the liability back interest free.

"This is a fair and balanced approach which fixes the public services we all rely on."

From April 2026, inherited agricultural assets worth more than £1m, which were previously exempt, will be liable to the tax at 20% - half the usual inheritance tax rate.

Many farmers argue that while they are asset rich - for example, in terms of their land and livestock - they are cash poor and the changes would mean they would have to sell up to be able to pay the tax.

Reed said he was apologising for having "to take decisions that are very difficult for the sector because of what we inherited".

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'Farm inheritance tax will devastate us'

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'Warning shot' to Starmer as farmers' protests target supermarket supply chains

KEY MOMENTS

10 January 2025 • 2:46pm

2:10pm

Blood will boil if we are not listened to, say organisers

1:43pm

IHT will deprive Britons of fresh, local produce

1:02pm

Northampton protest is a 'warning shot'

11:58am

Tax change will 'cripple farming'

10:54am

Ministers are 'totally disconnected' from farmers



Tractors begin a three-hour slow protest drive along the A303 in Hampshire on Friday Credit: Jamie Lorriman

Hundreds of farmers staged tractor protests on Friday, with go-slow drives attempting to disrupt supermarket supply chains in “a warning shot” to Sir Keir Starmer

Dozens of local groups took to the roads as they called for the Government to scrap its inheritance tax raid, which they say will “cripple” farming.

Organisers said their protests would “escalate”, threatening to “hit hard” by targeting docks or staging more action in London if the Government continued to refuse to engage with farmers’ unions.

In Northwich, Cheshire, a distribution centre for Morrisons was the target of nearly 50 tractors on Friday. Lorries were held up in the traffic created by the protest, organised by the group Farmers to Action.



A distribution centre for Morrisons in Cheshire was targeted by a tractor protest Credit: Jacob Freedland

Elsewhere, 80 tractors assembled at Thruxton Race course, in Hampshire, and began a three-hour slow protest drive along the A303.

Protests also took place in the High Peak towns of Derbyshire. Organisers warned that “blood will boil” if the Government continued to ignore their

concerns. More go-slows took place in Dorset, Devon, Cornwall, Lincolnshire and Berkshire.

Sue Flower, a 63-year-old dairy farmer who helped coordinate the protest, said: “That’s going to be hard to contain and it will escalate.

“We don’t want to, but we will have to hit hard. It might be the docks, it might be in London – it’s going to be disruptive. They say farmers can’t strike, but we’ll see if they don’t engage with us. We’ll see.”



Another distribution centre in Northampton was targeted by Phillip Weston, a fellow organiser, who said the go-slow convoy was a “warning shot” about what could happen in the future, with farmers needing to “stand up for themselves”.

Protesters received support from members of the public, who turned out in their dozens to brave the cold and cheer them on.

Other planned tractor protests at supermarkets have been scheduled by other groups next week, while the National Farmers’ Union plans a day of action, particularly targeting Labour seats, later this month.

Latest updates

Tom McArdle. Max Stephens. Jacob Freedland
10 January 2025 • 4:51pm



2:46pm

Thanks for following

That's it for today's coverage of the farmers' protests. Thanks for joining.

2:18pm

IHT tax is a 'land grab'

Phillip Weston, 39, who organised the go-slow convoy at a food distribution centre in Northampton, labelled Labour's inheritance tax raid as a "land grab".

The fifth generation arable farmer, whose family have been on the site since 1820, said: "This is purely a land grab situation in order to build housing.

"That is the long term goal of the Government.

"Unfortunately it is about a land grab and a green-planning agenda."

He also criticised the Government for spending more money on "foreign farms" while not supporting their own.

"We have got a Government that cannot bring itself to admit they got it wrong," he added.

"It's very scary times."

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2:10pm

Blood will boil if we are not listened to, say organisers

Sue Flower, who helped organise today's Derbyshire protests, warned things would escalate if the Labour government continued to refuse to meet with farmers' unions.

"I think they have got a narrative not to engage with us," the 63-year-old dairy farmer said.

"For too long we have been pushed from one thing to another - from pillar to post."

She said she "couldn't remember" the last time a Government "got behind its farming".

"If they do not engage with us soon, there is going to be blood boiling over," she continued.

"That's going to be hard to contain and it will escalate.

"We don't want to, but we will have to hit hard.

"It might be the docks, it might be in London - it's going to be disruptive.

"They say farmers can't strike but we'll see if they don't engage with us - we'll see."

1:53pm

In pictures: Protesting farmers take to the road



A pair of tractors take up both lanes of the A303 in Hampshire Credit: Jamie Lorriman



Farmers are cheered on by supportive members of the public Credit: Jamie Lorriman



View from a tractor - showing the Morrisons van being held up in Cheshire Credit: Jacob Freedland

1:43pm

IHT will deprive Britons of fresh, local produce

Adam Brown, a 37-year-old dairy farmer in Cheshire, warned the tax raid will put smaller farms out of business.

As a result, the father-of-one said consumers will be deprived of “fresh, local” produce, *Jacob Freedland reports*.

“[Supermarkets] are going to have to be buying in,” he said.

“There’ll be nothing that’s local and fresh.

“You can import food, but that’s going to come at a cost and you don’t know what you’re buying in half the time.”

Charlie Frith, 24, a fifth generation dairy farmer, explained: “It’ll only be the massive farms that will be able to afford land prices here.”

1:21pm

Supporters brave the cold to back farmers

Ian Sharratt, 73, an arable and sheep farmer from the Hampshire village of Barton Stacey said of the inheritance tax: “It is not good is it, it is just not good, markets are down.

On Sir Keir, he said: “Not so good is it, nothing is doing, nothing is happening.

“Everything is against us at the moment.”

Mr Sharratt is one of approximately two dozen supporters who are braving the biting cold temperatures on a bridge above the A303 to support the slow drive, *Max Stephens reports*.

Dave Griffin, 73, a semi retired business owner who runs a chimney sweep company, said: “I heard they were coming down, I think it is a good cause, to give them some support.

“They are having some hard times.”

Terry Dewey, an 81-year-old part time pall bearer and former tractor salesman from the same village, said: “It is such a shame this is happening, it is terrible.

“They [farmers] work seven days a week, 24 hours, they hardly ever go on holiday.

“Shame this has happened, dare I say with the Labour government.

“It is great to see the guys pulling together, they are doing it in a sensible way, they will. Provided nothing silly happens, they will get the country’s support.”



Supporters were out in force above the A303 despite the cold Credit: Jamie Lorriman

1:02pm

Northampton protest is a 'warning shot'

Phillip Weston, 39, has helped organise a go-slow convoy around a local centre that covers most of the midlands food distribution for a couple of mainstream supermarkets.

The arable farmer said it would provide an “insight” into the future impact of supermarkets not being able to supply the public.

“It is to bring awareness when the lorries stop delivering out of these places, the food doesn’t reach the shelves,” he said.

“That is a sign of things to come when food doesn’t reach the centres from us - it’s a warning shot.”

He said none of the dozens of farmers there wanted to be, but felt they had to “stand up for themselves”.

12:42pm

Farmers call for 'death tax' to be abolished

In Hampshire, the convoy is slowly making its way along the A303, *Max Stephens reports.*

Some tractors are flying Union Jack flags from their vehicles, while others are displaying anti-Labour posters and placards.

One poster on the side of a tractor reads 'Strong Together, British Farming Forever'.

Another tractor had a fake coffin hoisted on the back of the vehicle with the words underneath 'RIP farmers Abolish the Death Tax.'

Therese Pitt, a local supporter from Thruxton, who is waiting on top of a bridge for the convoy, said: "British food for British people and that needs British farmers.

"I want as many farmers as possible, big farmers and small farmers.

"We should be self sufficient.

"I do not think humanity has covered itself in glory."

On Sir Keir, she added: "I would not vote for him."



Tractors make their way along the A303 in Andover, Hampshire

12:31pm

Morrisons staff take pictures of protesting tractors

Morrisons' security staff are taking pictures of the tractors involved in the go-slow protest, *writes Jacob Freedland.*

Staff guarding the entrance to the Gadbrook Logistics centre off the A530 were also overheard saying: "There's nothing we can do. They're not stopping so it's not illegal."

One security officer said the situation was improving, with lorries able to enter and exit the centre more easily than at the beginning of the slow drive.

The supermarket has been contacted for comment.

12:23pm

Watch: Farmers take to the road in Berkshire

Farmers To Action

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11:55 AM · Jan 10, 2025

53
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12:20pm

Farmer won't be able pass farm onto his daughters

A father-of-two whose dairy farm has been in the family for over 60 years has said he won't be able to pass the business down to his daughters if Labour's tax raid goes ahead, *Jacob Freedland writes*.

Ryan Brown, 31, said: "It would be nice if they could come into the business, but the way things are going it's not going to be possible.

"My grandma bought the farm in 1961 and we've grown it into a family farm.

"There's 19 of us that work here. But if the tax goes ahead, it's going to put a lot of these people out of a job."

12:11pm

Pictured: Farmers leave Thruxton Race Circuit, Hampshire



Farmers in Hampshire have been met with support in Friday's protest Credit: Andrew Matthews/PA Wire

11:58am

Tax change will 'cripple farming'

Tom Trueman is an eighth generation farmer, whose beef and lamb farm in Buckfastleigh, Devon, has been in the family for 360 years.

The 41-year-old has helped coordinates protest efforts in Devon, where dozens of tractors will be travelling in opposite directions up and down the

A38 in another go-slow drive.

“Our message is to reverse this inheritance tax,” he said.

“It is going to cripple farming and other industries. What Labour did was very sneaky with the 50 per cent relief because farmers’ profit margins are so slim.

“They’re trying to force farmland to national ownership or sell it on to private companies.”

The protest on the A38 - which goes down to a single carriageway in some places - is set to last up to three hours and will see tractors limited to 15mph (24 kilometres per hour).

11:43am

Locals show farmers in Hampshire support

We are currently on an icy bridge overlooking the A303 waiting for the convoy of tractors to appear, *Max Stephens reports*.

A steady stream of appreciative honks can be heard from lorry drivers and motorists passing underneath in solidarity with the protest.

The series of bridges lining the A303 is peppered with those sympathetic to the cause, including a group of Reform supporters.

Nigel Farage, the party leader, has been a common sight in previous Westminster rallies.

Sausage rolls are being handed out by organisers to families, friends and supporters who are turning out on bridges in support of the slow drive.



11:36am

Derbyshire farmers 'aren't going to sit back'

Sue Flower is organising a group of up to 50 tractors in another go-slow drive through the High Peak towns of Derbyshire.

The dairy farmer said Labour's IHT raid had pushed farmers "over the edge" but that the peaceful protest was needed to show the group's feeling.

Mrs Flower, 63, said: "We want to get a message to Labour, we aren't going to sit back.

"They won't engage with us. We will carry on trying to reach out to get listened to."

She added: "They have got it wrong, they've got it so, so wrong.

"Agriculture is the only industry we've got left that isn't foreign owned - we need to save it.

11:28am

IHT will 'destroy farming'

Marie Dyke, 60, and Susan Cooper, 79, are among a number of local supporters who have turned out for the rally, *writes Max Stephens.*

Ms Dyke, who watched as the convoy left the race circuit and trundled towards the dual carriageway said of Sir Keir Starmer's administration: "I have not spoken to one person who is happy with them.

“They are not like a Labour Party, the Labour Party is for the people.

“People think farmers are well off. [The tax] will destroy farming if they do that.

“Most people I speak to feel the same way.”

Ms Cooper, who also attended the recent rallies in Westminster with Ms Dyke added: “I am not happy with them.”



A trailer is emblazoned with a banner depicting views on the Prime Minister for his Government's IHT raid Credit: Jamie Lorriman

11:13am

Hampshire farmers setting off

The convoy are now leaving Thruxton Race Course and are setting off on their slow drive along the A303, *writes Max Stephens.*

The farmers jovially beeped their horns towards a small throng of supporters as they passed through the gates.

‘Farmers rise against Labour Lies’, read one poster adorning the front of a tractor.

‘Back British Farming and the Farmers Will Back You,’ read another.

Kurt Morton, addressing the group with a megaphone before their departure, said: “I know we are going to upset a couple of people but we’re

not here for them, we're here for us."

He reminded farmers to pull over to the left in case police cars or ambulances needed to get past.

The convoy will travel along the A303 towards Basingstoke at a speed of approximately 10 mph (17 kilometres per hour).



Protesting farmers before they embark on their go-slow drive

11:07am

Support for Cheshire protest

Motorists appear to be supportive of the farmers' protest despite the slowed traffic, *Jacob Freedland writes*.

Drivers have flashed lights and honked horns as gestures of support.

One driver of a Morrisons' vehicle - who had been slowed by the farmers' convoy - even gave a thumbs up to one of the tractors involved in the protest.

Adam Brown, 37-year-old dairy farmer, said: "It's good to see the support we're getting from the general public.

"We're not trying to target them. I'd like to think most of them agree with us.

"The country needs farms, not just for food but to protect the environment.



A Morrisons lorry is held up by farmers in their tractors Credit: Jacob Freedland

10:54am

Ministers are ‘totally disconnected’ from farmers

Chris Marchment said his farm, which has been in his family for 100 years, is now facing a £650,000 tax bill from Labour’s tax reforms, *writes Max Stephens.*

The father-of-two and fifth generation arable farmer, who runs Foxcotte Farm about a mile away from the Hampshire rally, said: “Nothing is off the table.

“We will fight this the whole way.”

He said ministers in Westminster were “totally disconnected” from the difficulties the nation’s farmers are facing and added: “It brings me to tears.”

Paul Barret, a Reform UK candidate for Romsey and former paratrooper, who has turned up in support for the farmers, said: “I come from a farming background.

“It is not only farmers who are being hurt by the inheritance tax but local businesses. They work hard and feed the nation.”

Asked if he had a message for Sir Keir Starmer, he said: “Step down and call a general election.”

Mr Barrett, who is enjoying a warm reception among the farmers, said he intends to meet with a group of Reform supporters on a bridge overlooking the A303 as the tractors slowly rumble along underneath.

A livestock trailer with the words 'Axe The Tax' emblazoned on the side has turned up alongside the host of tractors.

10:49am

Convoy of tractors roll out in Cheshire

Around 50 farmers and 40 tractors have started a go-slow protest in Northwich, Cheshire, *Jacob Freedland writes.*

They are planning to disrupt trucks distributing goods from a Morrisons centre by driving slowly for three hours along the A530.

Stewart Whitlow, who works for a machinery dealership and is leading the group, said: "Farmers simply can't afford this hit because they don't get paid enough.

"We're trying to prove the necessity of the agriculture sector, that farmers are the ones putting food on the table.

"This is just the start. It's going to get bigger and bigger."



A farmer calls on the public to 'Back British Farming' with the sign on his tractor during the Cheshire rally

10:44am

Farmers congregate in Hampshire for protest

Around a hundred farmers and 80 tractors have assembled at Thruxton Race Course in Hampshire, *writes Max Stephens.*

The farmers intend a three hour long slow protest drive along the A303.

Kurt Morton, an arable farmer and representative for the group, said: “We do not want to come out and do this but it is last resort.

“The public are behind us they are fed up with being left out of pocket.

“We are not out to hurt anybody.

“We are not militant people, we are not like the French but we cannot carry on like this.

“We are still being paid what we were being paid 30 years ago.”



Farmers arrive at Thruxton Race Circuit, Hampshire, with protest signs attached to their tractors Credit: Jamie Lorriman

10:30am

What is expected today?

Dozens of local groups are planning go-slow tractor drives through towns, villages and main roads, with some targeting retail distribution centres.

Centres in Cheshire and Northampton are likely to be impacted.

Those coordinating the efforts have dubbed them a “warning shot” to show the impact of a future without farming.

Protests are also planned in Dorset, Hampshire, Devon, Cornwall, Derbyshire and Lincolnshire, with things set to kick off at 10.30am.

Organisers have warned action could ramp up in following weeks if the Government continue to refuse to engage.



10:28am

Why are farmers protesting?

Hundreds of farmers are today protesting in what is the latest move against Labour’s inheritance tax raid.

Under the changes implemented by Rachel Reeves in last year’s Budget, farms worth more than £1 million will be subject to a 20 per cent levy, half the usual inheritance tax rate.

The new rules are set to come into force from April 2026.

However, rural groups have argued that the £1million threshold will hit the majority of working family farms, which are asset-rich but cash-poor, instead of targeting wealthy landowners seeking to avoid inheritance tax.

This has sparked several high profile rallies in London and elsewhere across the UK.

Today marks the first coordinated protest of 2025 as farmers push for the Government to scrap the policy.



Dozens of protesting farmers congregate in Hampshire on Friday morning Credit: Andrew Matthews/PA Wire

10:27am

Welcome to the blog

Good morning and welcome to our coverage of today's protests against Labour's inheritance tax raid.

Join the conversation

The Telegraph values your comments but kindly requests all posts are on topic, constructive and respectful. Please review our commenting policy.



Related Topics Farming, Protests, Keir Starmer, Supermarkets, Inheritance tax

You need to be a subscriber to join the conversation. Find out more [here](#).

Subscribe



Join the conversation

TT

The Tyke 1 DAY AGO

Excellent way for farmers to lose any support from the majority. Make our lives harder by blocking roads and access to supermarkets.

Tell you what I'll start blockading farms.

You need to give your heads a wobble and think who you are impacting.

ES

elizabeth sefton 1 DAY AGO

Support the farmers 100%. Labour should be ashamed of themselves. Soon we will have no gas and no food. Remind me again - is this 2025!.

BM

Backwoods Man 2 DAYS AGO

It would be a wiser and more effective ploy thoroughly to barricade the safest Labour seats. Make them realise what else they were voting for in addition to grooming gangs and the jailing of 'far right' grannies

ET

Eliza Trundle 2 DAYS AGO

Every hour this government has its' hands in the Treasury is 1 hour too long. This is taking too long and the UK should not have had Christmas dinner. At this rate maybe aim for no food for Easter!

JP

Jacky Pugh 2 DAYS AGO

On the 25th they are targeting labour rural constituencies. I hope that we all support them . Reeves budget needs a total rethink

PW

Pauline Williams 2 DAYS AGO

Do want you need to do with you all 🙄 percent

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Original audio



togetherdeclaration FAMILY FARMS TAX:

Farmers now outside @Morrisons in Bideford

@FarmersToAction day of action

Rethink of this destructive policy needed @stevereedmp @rachelreevesmp @uklabour @KeirStarmar @DefraUK

With Our Farmers #together

#farmers #farmersprotest

1 d



makeitrealtoday 🙌🙌🙌🙌🙌🙌🙌🙌

18 h Reply



tanuk2022 🍌🍌🍌 brilliant

1 d Reply



186 likes

1 day ago



Add a comment...

Post



Farmers To Action launches day of national protests

Philip Case 10 January 2025



Image supplied by #Together Facebook group

Angry farmers across the UK are taking their tractors to the streets today in a national day of action against anti-government farming policies, led by the recently formed lobby group Farmers To Action.

The protests on Friday 10 January will see more than 40 tractor road runs across England, Wales, and Scotland, with events taking place in areas including Berkshire, Norfolk, Hampshire, Sussex, Devon, Chester, Leicestershire and Northumberland.

Farmers are also using tractors to block supermarket distribution centres in some locations, including Reading, Northampton and Cheshire.

At Thruxton Circuit in Andover, Hampshire, hundreds of tractors assembled ahead of a their go-slow drive along the A303.

“ LIVE NOW

Berkshire Roll Out

FARMERS DAY OF ACTION across...

Join the Farmers Weekly community.

Register

Register for 4 free articles a month and choose the newsletters you want to receive.

Already have an account? Please sign in:

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Farmers To Action's post



Farmers To Action

Yesterday at 10:26 · 🌐



Somerset Farmers fighting for our farms and fair pricing for your food 🍌

📍 Bridgewater Depot [Morrisons](#)

Our Farmers, Your Food, Everyone's Future 🇬🇧 🚜

Together

[#farmerstoaction](#) [#farmers](#) [#together](#)



👍❤️ 69

3 comments 22 shares

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Most relevant



BBC Bristol · [Follow](#)

Hello, I'm a reporter with BBC West - I've just sent you an email if someone is free to take a look? Many thanks



22h [Like](#) [Reply](#)

Together Declaration's post



Together Declaration

10 January at 20:54 · 🌐



🚧 LIVE: Farmers look to have parked tractors over access roads to [Morrisons](#) distribution centre, Bridgwater, Somerset

Part of further action through night with [Farmers To Action](#) in protest at Family Farms Tax

Rethink needed [Steve Reed MP](#) [The Labour Party](#) [Rachel Reeves](#)



👍❤️ 104

20 comments 36 shares

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Most relevant



Neil Gower

Not a family farm tax, it is inheritance tax which every other person in the UK is subjected to, but at less generous conditions. You are losing support from the majority of the people by sounding very spoilt and privileged. You can also avoid it.



1d Like Reply



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Creator videos



Aaran Whitmore

did u do both morrisons there or just the bigger one

👍 0

2h ago Reply

View 1 reply



Tony Mac

with you all from Yorkshire 🙌🏡

👍 2

3h ago Reply

View 2 replies



Elise Palmer

Went to the first one of these but didnt know a second was happening else i would have been there

👍 3

4h ago Reply



suziespice

Well done farmers 🥳🥳🥳

👍 5

17h ago Reply

Add comment...

@ 🧐 Post

Farmers To Action's post



Farmers To Action

21h · 🌐



LIVE NOW: Saturday Morning [Morrisons](#) Taunton

[Morrisons](#)...The time to show you back Farmers is now.

📷: @abbie.lewis2

[#farmerstoaction](#) [#together](#) [#farmers](#) [#farmersprotest](#)





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Forums > Farm Business > **Farmer Action Hub** >

"Supermarket Meet" tractors - 17th January

👤 Clive · 🕒 Monday at 7:35 PM

1 2 3 ... 19 Next ▶



Clive

Staff Member

Moderator

Location: Lichfield

Monday at 7:35 PM

🔊 #1

Plan for a coordinated national action,

This action is supported and promoted by the organisers of the the various other successful large events to date and we will be asking The NFU to also support this and get members involved

When - January 17th

Where - a local supermarket there will be one close to you on a list we will publish in due course

What - Drive and park your tractor to a local supermarket, ideally with banners etc and park in their carpark. The aim will be to spend a couple of hours in a none disruptive way and then disperse. Ideally we want tractors but if you really can't manage that a farm pickup will be ok (double cab preferred !)

Why - to keep pressure on that farmers are not backing down on the damage this budget will cause and show the strenght of our resources that "could" be used in far more disruptive ways sould that become necessary !

Whilst there be sure to buy an item that can justify your visit as business use such as Tea / Coffee / cleaning products or office stationary. Tjis validates the use of your fuel and car parking

Organisation of this to be at local level so please get together with neighbours to choose you supermarket, we suggest you use whatsapp groups and TFF to coordinate yourselves

We will aim to coordinate and manage national press but any local press and promotion your groups can get will help

Replies to this thread **NOT** to question this action (they will be deleted so don't bother !) Replies **ONLY** to state that you will be participating and your nearest town so we can build that "target" list

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cost you **NOTHING** more than your time, no train ticket to London required this time, **EVERY** farmer should get involved in this

Please spread the work vai you networks, text and whatsapp friends etc

Last edited: Monday at 7:48 PM

↩ Reply

Shebb90, Steve770, Jimbo and 21 others



Monday at 7:53 PM

🔊 #2

Check the signs in the carpark. They are private property and the supermarkets are quite within their rights to fine you for using them, and the inheritance tax issue isnt their fault or problem. You may be better off talking with them to ask

Magnus Oyke

Member

Arable Farmer

for permission and getting them on side. They probably won't want to get involved too much but farmers and supermarkets have a symbiotic relationship.

[Reply](#)

[AndersonAgri](#), [dun tilling](#), [Devil's advocate](#) and 3 others



Grass And Grain

Member

Mixed Farmer

Location: Yorks

Monday at 7:54 PM

#3

Hi everyone,

As chair of the BFU I will be supporting this, and will be emailing out to members. Hopefully NFU will do the same, as we all need to work together.

As a cereal farm we'll need £320/acre increased sales/profit to pay our IHT liability over the 10 year period. That's a minimum 50% increase on sales output compared to currently. We should be asking supermarkets for this, because somehow the tax has to be paid.

Personally I'd suggest picking a category of food, purchasing and donating to a food bank, then it's charitable. Many supermarkets have a food donation basket.

Make sure the supermarket you plan to visit doesn't have vehicle height restrictors.

Last edited: Monday at 10:58 PM

[Reply](#)

[Hfd Cattle](#), [spin cycle](#), [Thomas Simpson](#) and 6 others



Clive

Staff Member

Moderator

Location: Lichfield

Monday at 7:58 PM

#4

Magnus Oyke said: [ⓘ](#)

Check the signs in the carpark. They are private property and the supermarkets are quite within their rights to fine you for using them, and the inheritance tax issue isn't their fault or problem. You may be better off talking with them to ask for permission and getting them on side. They probably won't want to get involved too much but farmers and supermarkets have a symbiotic relationship.

I don't think the PR would be very good for them finding the very farmers that make their multi billion £ annual profits possible !

We don't need permission, they need us !

[Reply](#)

[Bella_vista](#), [spin cycle](#), [ladycrofter](#) and 4 others



Magnus Oyke

Member

Arable Farmer

Monday at 8:03 PM

#5

Clive said: [ⓘ](#)

I don't think the PR would be very good for them finding the very farmers that make their multi billion £ annual profits possible !

We don't need permission, they need us !

You do need permission, it's their land, how would you like Allied Grain or Rank Hovis doing something similar in your yard? It's nothing to do with the supermarkets, go and park yourself outside you MP's office

[Reply](#)

[iaincr](#), [Storeman](#), [Bullock82](#) and 3 others



Henarar

Member

Livestock Farmer

Location: Somerset

Monday at 8:11 PM

#6

White diesel ?

Reply

An Gof



neilo

Member

Mixed Farmer

Location: Montgomeryshire

Monday at 8:45 PM

#7

Magnus Oyke said: ⤴

You do need permission, it's their land, how would you like Allied Grain or Rank Hovis doing something similar in your yard? It's nothing to do with the supermarkets, go and park yourself outside you MP's office

You don't need permission to park there, usually for up to 2 hours, as long as you go in and buy something from the store (as per @Clive 's post above).

Buying a biro for the farm office would justify the use of red diesel in driving there.

Reply

farmer james, Hfd Cattle, snipe and 13 others



LP

Member

Arable Farmer

Location: Newbury

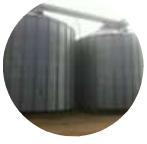
Monday at 8:48 PM

#8

If you want it in coordination with NFU why not do it on the 25th? Make sure it's for charity. Talk about galvanising farmers, 3 runs in 15 days? Any joined up thinking at all on this?

Reply

jgmleyns and farmerm



grainboy

Member

Location: Bedfordshire

Monday at 9:02 PM

#9

Well now they have 10 days to put in appropriate measures, to prevent this action, Sorry but, You're lost all the surprise,

Last edited: Monday at 9:07 PM

Reply

jgmleyns



Daniel

Member

Mixed Farmer

Location: Suffolk/Cambs border.

Monday at 9:29 PM

#10

I'm happy to go to Ely Tesco or Sainsbury's. Our shitty old Deutz is in for repair so might have to take a Fendt. 🚗

Reply

Clive



Clive

Staff Member

Moderator

Location: Lichfield

Monday at 9:35 PM

#11

Henarar said: ⤴

White diesel ?

if you do as suggested and buy a business Member item such as tea / coffee / cleaning product or office stationery etc then your cost is business and use of red is ok

alternatively buy a food item and donate to a food bank and your covered under charity

stop looking fur problems and JFDI ! di you think French farmers have such conversations ? 🤔

[Reply](#)

Corn & Horn, Jsmith2211, quattro and 18 others



Clive

Staff Member

Moderator

Location: Lichfield

Monday at 9:36 PM

#12

grainboy said: 🗨️

Well now they have 10 days to put in appropriate measures, to prevent this action, Sorry but, You're lost all the surprise,

don't need surprise, if they close car parks the road will be blocked stopping customers getting in and that will be their fault so a pretty stupid thing to do

just do it or sit like a lemming watching your industry be destroyed !

[Reply](#)

Steve770, Farmerwilson, mobileweld and 13 others



Clive

Staff Member

Moderator

Location: Lichfield

Monday at 9:39 PM

#13

L P said: 🗨️

If you want it in coordination with NFU why not do it on the 25th? Make sure it's for charity. Talk about galvanising farmers, 3 runs in 15 days? Any joined up thinking at all on this?

the NFU are not working with anyone, they have made that clear on multiple occasions now - what they are "actually" doing on the 25th seems very unclear as usual their communication is abysmal

they can promote this they want and i hope they final do so

[Reply](#)

RichardSou, Hfd Cattle, Hay Maker and 2 others



grainboy

Member

Location: Bedfordshire

Monday at 9:42 PM

#14

I'm just watching as an outsider,
The French wouldn't lay their cards on the table,

[Reply](#)



Clive

Staff Member

Moderator

Location: Lichfield

Monday at 9:53 PM

#15

grainboy said: 🗨️

I'm just watching as an outsider,
The French wouldn't lay their cards on the table,

we are not being disruptive with this so there is no need to be secretive about it is there, how will people know it's happening to join if it's a secret 🤔🤔

it will be VERY bad PR for any supermarket to try stop legal and peaceful demonstration farmers have a lot more public support than they do !

[Reply](#)

Ffermer Bach and AT Aloss



Woolly
Member

Mixed Farmer

Location:
Romney Marsh

Monday at 9:56 PM

#16

If only the 17th was on a Tuesday ! 😊



Reply

Nearly, Hfd Cattle, JPB and 9 others

M

mixedfmr
Member

Mixed Farmer

Location: yorkshire

Monday at 10:13 PM

#17

Woolly said: ①

If only the 17th was on a Tuesday ! 😊



Click to expand...

We could all have called in for lewance

[Reply](#)



Magnus Oyke
Member

Arable Farmer

Monday at 10:15 PM

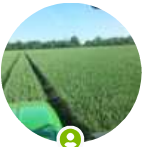
#18

neilo said: ↻

You don't need permission to park there, usually for up to 2 hours, as long as you go in and buy something from the store (as per @Clive 's post above).
Buying a biro for the farm office would justify the use of red diesel in driving there.

You don't need permission to park there when you do your shopping, I'd suggest you would to use their land for anything other than shopping with them. This isn't their problem

[Reply](#)



essex man

Member

Location: colchester

Monday at 10:16 PM

#19

Magnus Oyke said: ↻

You don't need permission to park there when you do your shopping, I'd suggest you would to use their land for anything other than shopping with them. This isn't their problem

I think that's where the biro buying comes in

[Reply](#)

Hfd Cattle, Cowmansam, Storeman and 6 others



Magnus Oyke

Member

Arable Farmer

Monday at 10:20 PM

#20

essex man said: ↻

I think that's where the biro buying comes in

It's just taking the pee, the problem is nothing to do with the supermarkets. By all means speak to them, ask permission and get them on side, but you can't expect to rock up on some elses private land in a tractor and pickup to further your political argument.

[Reply](#)

Agrijas, Cowmansam and Storeman

1 2 3 ... 19 [Next](#)

?

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Write your reply...

[Farmer Action Hub](#)

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Supporting knowledge transfer:



Farmers To Action's post



Farmers To Action

22h · 🌐



SOMERSET FARMERS: 8 PM til 8 AM!

📍 Bridgewater Depot [Morrisons](#)

Our Demands are Clear.

Our Farmers, Your Food, Everyone's Future 🇬🇧 🚗

[#farmerstoaction](#) [#farmers](#) [#together](#)



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Tim Brownlow



18h Like Reply





Chris Fairbrother



Farmers To Action
 Yesterday at 03:15 · 🌐
 Leonie: "The government & supermarkets prioritising food security"
 Farmers are not going to back down Steve Reed MP @rachelreevesmp @uklabour Department Environment, Food and Rural Affairs (Defra)
 Our demands are clear.
 Our Farmers, Your Food, Everyone's Future
 #farmerstoaction #farmers #farmerspro #together
 See less

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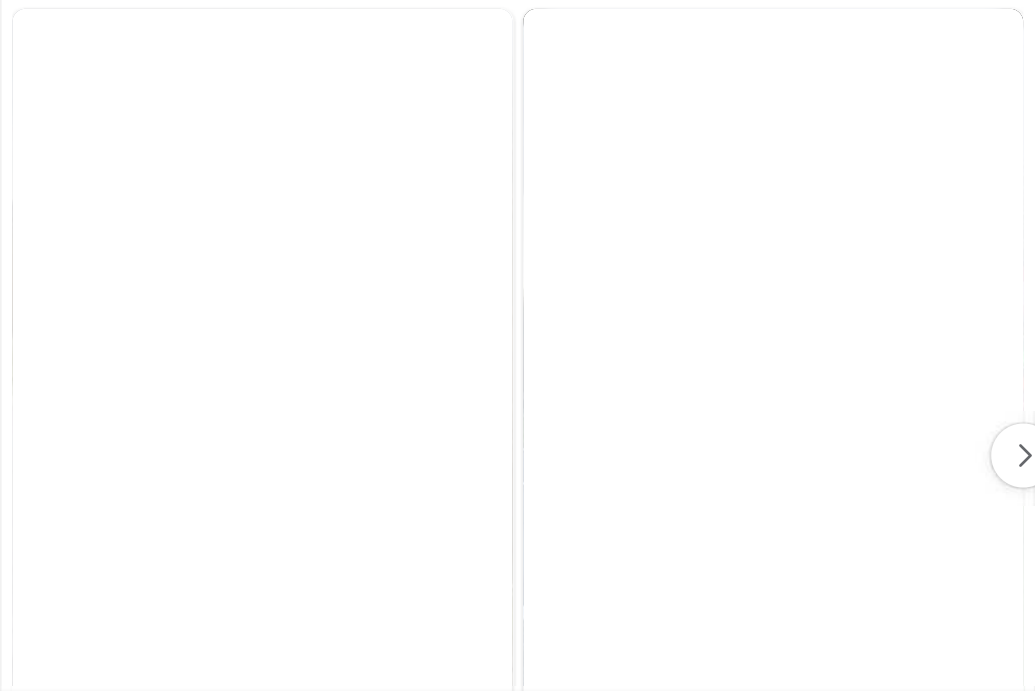
 **Rob Tucker** ...
 🍌🍌🍌🍌🍌
 1d 





Leonie: "The government & supermarkets need to start prioritising food security" Farmers are not going to back down Steve Reed MP...


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Farmer protests target supermarket supply chains

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togetherdeclaration Live updates:
<https://www.telegraph.co.uk/news/2025/01/10/farmers-protest-live-rachel-reeves/>

Time for rethink @uklabour @keirstarmer
1 d

paulleachphoto To support the farmers; and by farmers I mean the smaller independent farmers, we can all collectively boycott supermarkets!

If supermarkets are prepared to screw farmers on price and then deliberately fukc over the public with price gouging and profiteering in their obsession with obscene profits, they have no right to exist in a community they purport to serve!
1 d 3 likes Reply

smudge173 How can we as the people deal directly with you the farmers
1 d 1 like Reply

clown_world123 NO ONE CARES
1 d Reply

paulsargeant697 Food security is paramount to the UK. Imports can be shut down by the GOV. Despite their efforts, please everyone STOCK UP ON FOOD. Fill your pantries so you can use your NO MUSCLE 🙌
1 d 1 like Reply

441 likes
1 day ago

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AT3 - 53

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18



17

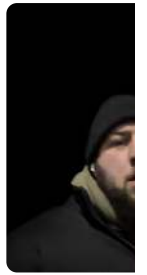
12

00:18 / 00:59

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The public needs to understand!...
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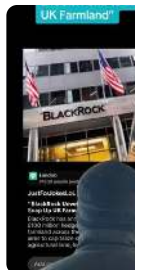
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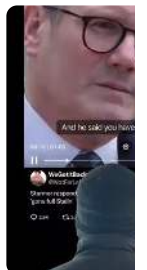
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again!! #farmer...
the.f.in.farmer7
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♡ 322 · 2024


18 comments


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 **John Tomlinson**
keep up the fight. time to put a stop this government
2d ago ♡ 2 Reply

Farmers that grow
YOUR FOOD need...
the.f.in.farmer7
♡ 52 · 2024-11-17

Labour are go
far enough is.
the.f.in.farmer7
♡ 28 · 2024-

 **Daisymae**
We have to get this government out
1d ago ♡ 3 Reply


 **Freedom**
well done everyone 🙌🙌 this government really does need to start listening 🙌
1d ago ♡ 1 Reply


 **mxemmak**
Brilliant! Keep up the pressure! Fully behind you all. 🙌🇬🇧🇬🇧🙌
2d ago ♡ 2 Reply

Farmers need to stop
inheritance tax!...
the.f.in.farmer7
♡ 15 · 2024-11-9

Farm protests
#britain...
the.f.in.farmer7
♡ 40 · 2024-

 **grunge943**
Where did you get the led signn from mate
2d ago ♡ 1 Reply


 **Chrissy claas** GBFTA
Enough is Enough fight for our futures 🙌🙌🙌
3d ago ♡ 6 Reply


 **JBR Crafts John**
Not just the farmers than need to stand up but all the people that rely on the farmers need to stand with you all
1d ago ♡ 5 Reply


 **Frank Mattinson175**
good lads 🙌
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 **Sammy**
♡♡♡
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The F In Farmer
@The_f_in_Farmer

Farms and businesses could be decimated if government doesn't stand down on its bullshit policies!

@PFFA_UK @alanvibe



12:54 PM · Jan 11, 2025 · **18.6K** Views

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2



High Court Injunction in Force**NOTICE OF HIGH COURT ORDER DATED **INSERT** ("the Order")**

1. **PERSONS UNKNOWN WHO, IN CONNECTION WITH PROTESTS AGAINST THE GOVERNMENT'S ANNOUNCEMENT TO REFORM AGRICULTURAL PROPERTY RELIEF AND BUSINESS PROPERTY RELIEF BY 'FARMERS TO ACTION' OR OTHER SIMILAR PROTEST GROUPS ENTER AND REMAIN WITHOUT CONSENT UPON ANY OF THE FOLLOWING SITES:**
 - (a) **ON THE [First / Second / First and Third] [CLAIMANT'S/CLAIMANTS'] **INSERT** RETAIL DISTRIBUTION CENTRE AT **INSERT** (SHOWN COLOURED **BLUE** ON THE BELOW PLAN)**
2. **PERSONS UNKNOWN WHO, IN CONNECTION WITH PROTESTS AGAINST THE GOVERNMENT'S ANNOUNCEMENT TO REFORM AGRICULTURAL PROPERTY RELIEF AND BUSINESS PROPERTY RELIEF BY 'FARMERS TO ACTION' OR OTHER SIMILAR PROTEST GROUPS, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHER AGRICULTURAL VEHICLES AND EQUIPMENT, CREATE OR CAUSE BLOCKADES, OBSTRUCTIONS OF TRAFFIC AND/OR OTHERWISE IMPEDE, PREVENT OR INTERFERE WITH THE PASSAGE BY THE CLAIMANT, ITS AGENTS, SERVANTS, EMPLOYEES, LICENSEES, INVITEES TO, FROM, OVER AND ACROSS THE ACCESS ROAD(S) IN THE VICINITY OF THE FOLLOWING SITES:**
 - (b) **THE [First / Second / First and Third] CLAIMANT'S **INSERT** RETAIL DISTRIBUTION CENTRE AT **INSERT** (SUCH ACCESS ROAD(S) SHOWN COLOURED PINK AND/OR ORANGE ON THE BELOW PLAN)**
("the Defendants")

FROM: **INSERT ("the [First / Second / First and Third...] Claimant/s")**

This notice relates to the land known as **INSERT** which is shown coloured [blue / pink / orange] on the Plan below (the "Plan").

The Order prohibits:

1. [entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the [First / Second / First and Third] Claimants for the purpose of protesting against the government's announcement to reform agricultural property relief and business property relief by 'farmers to action' or other similar protest groups] without the prior consent of [the First / Second / First and Third Claimants]; and
2. [with or without vehicles, including tractors or other agricultural vehicles and equipment, creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the the First / Second / First and Third Claimants its agents, servants, employees, licensees, invitees to, from, over and across the access roads shown coloured [pink / orange] on the Plan].

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 the 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 **INSERT** 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 **INSERT DATE** may be viewed at: www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.

INSERT RELEVANT PLAN

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
Before: Mr Justice Dexter Dias
On: 3 December 2024
BETWEEN

Claim No. QB-2022-001259

SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED

- and -

PERSONS UNKNOWN ENTERING OR REMAINING IN OR ON THE BUILDING KNOWN AS
SHELL CENTRE TOWER, BELVEDERE ROAD, LONDON ("SHELL CENTRE TOWER") WITHOUT
THE CONSENT OF THE CLAIMANT, OR DAMAGING THE BUILDING OR DAMAGING OR
BLOCKING THE ENTRANCES TO THE SAID BUILDING



QB-2022-001259

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER YOU MAY BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

IMPORTANT NOTICE TO 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.

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 may be imprisoned, fined or have their assets seized.

A Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instructions or with his encouragement.

You have the right to ask the Court to vary or discharge this Order (which is explained below)

RECITALS

UPON the final hearing taking place on 22-23 October 2024 and pursuant to paragraph 15 of the Order of Cotter J dated 24 April 2024

AND UPON hearing from Myriam Stacey KC and Joel Semakula for the Claimant, and no Defendant appearing

AND UPON the Claimant giving the undertaking set out in the First Schedule to this Order

IT IS ORDERED:

DEFINITIONS:

1. the “**Shell Centre Tower Injunction Order**” means the Order of Cotter J dated 24 April 2024 in these proceedings
2. “**Shell Centre Tower**” means the building outlined in red and/or blue on the plan which is attached to this Order (but including any canopy) marked “BUILDING PLAN” known as and situated at Shell Centre Tower, Shell Centre, Belvedere Road, London.
3. “**Warning Notice**” means a notice substantially in the form as set out in the Fourth Schedule to this Order (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.noticespublic.com/>) at which copies of this Order may be viewed and downloaded)

INJUNCTION

4. Subject to the annual review referred to in paragraph 14, with immediate effect until 23:59 on 3 December 2029, unless varied, discharged or extended by further order, the Defendants and each of them must not do any of the acts listed in paragraphs 5 and 6 of this Order in express or implied agreement with any other person.
5. The acts referred to above are:
 - a. entering or remaining upon any part of the Shell Centre Tower without the consent of the Claimant;
 - b. blocking access to any of the doors which provide access and egress to and from the Shell Centre Tower;
 - c. causing damage to any part of the Shell Centre Tower whether by:
 - i. affixing themselves, or any object, or thing, to any part of the Shell Centre Tower, or to any other person or object or thing on or in Shell Centre Tower;
 - ii. erecting any structure in, on or against Shell Centre Tower;
 - iii. spraying, painting, pouring, sticking or writing with any substance on or inside any part of Shell Centre Tower; or
 - iv. otherwise.
6. A Defendant who is ordered not to do something must not do it himself/herself/themselves or in any other way. He/she/they must not do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions, or by another person acting with his/her/their encouragement.

SERVICE OF THIS ORDER

7. Pursuant to CPR 6.15 and 6.27 and CPR 81.4(c) and (d), service of this Order shall be validly effected upon the Defendants as follows:
 - a. replacing each of the warning notices which are currently affixed at the entrances around the perimeter of Shell Centre with a Warning Notice;
 - b. procuring that a Warning Notice is uploaded to www.shell.co.uk;

- c. Sending an email to each of the addresses set out in the Second Schedule of this Order providing a link to and, specifically notifying them that a copy of the Warning Notice and this Order is available at, <https://www.noticespublic.com/>
 - d. uploading a copy of this Order to <https://www.noticespublic.com/>
 - e. sending a link to the www.noticespublic.com data site where this Order has been uploaded to any person (or their solicitor) who has previously requested a copy of documents in these proceedings from the Claimant or its solicitors, either by post or email (as was requested by that person).
8. Pursuant to CPR 6.15 and 6.27, service of this Order shall:
- a. be verified by the completion of a certificate of service to be filed by the Claimant with the Court or a witness statement verified by a statement of truth in accordance with CPR r.22(1)(b); and
 - b. be deemed to be served on the latest date on which all the methods of service referred to in paragraph 7 above have been completed (such date shall be specified by the certificate of service).
9. The taking of such steps as are set out in paragraph 7 shall be good and sufficient service of this Order upon the Defendants and each of them.
10. The Court will provide sealed copies of this Order to the Claimant's solicitors for service (whose details are set out below).

SERVICE OF FUTURE DOCUMENTS

11. Pursuant to CPR 6.15 and 6.27 and CPR 81.4(c) and (d), service of any further document in these proceedings upon the Defendants (other than any Defendant who is subsequently named in these proceedings) shall be validly effected by:
- a. Sending an email to each of the email addresses listed in the Second Schedule to this Order and providing a link to and notifying them that copies of such documents are available at, <https://www.noticespublic.com/>
 - b. Uploading it to <https://www.noticespublic.com/>
 - c. Sending a link to the documents on <https://www.noticespublic.com/> to any person (or their solicitor) who has previously requested a copy of documents in these proceedings from the Claimant or its solicitors, either by post or email (as was requested by that person)
12. Such service shall be deemed effective on the latest date on which all of the steps in paragraph 11 have been completed.

LIBERTY TO APPLY AND FURTHER DIRECTIONS

13. Any person affected by this Order may apply to the Court at any time to vary or discharge it or any part (including in relation to the methods of alternative service) but if they wish to do so they must inform the Claimant's solicitors by email to the address specified below 48 hours before making such application of the nature of such application and the basis for it. Such person must provide their full name and address, and address for service to the Claimant's solicitors on the details below and to the Court and must, if appropriate, also apply to be joined as a Defendant to these proceedings at the same time
14. There shall be, subject to Court availability, for so long as this Order is in force, a hearing to annually review this final injunction Order to determine whether any material change has arisen since the granting of this Order that provides grounds for declining to continue the injunction as set out in paragraphs 4-6 above. Such annual reviews shall take place at a hearing to be listed no later than 1 month before the anniversary of this Order. The Claimant shall liaise with the Court to list any such hearing and provide a suggested time estimate and provide the Defendants with the notice of hearing as soon as practicable in accordance with paragraph 11 above.

15. The Claimant shall have permission to file and serve any further evidence not less than 14 days before the review hearing.
16. The Claimant shall file (by hard copy and electronic means) and serve (by electronic means only) two copies of the hearing bundle in a form compliant with the Kings Bench Division Guide 2023 by no later than 7 days before the review hearing.
17. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 3 days before the review hearing.
18. The Parties have liberty to apply to extend this Order or to seek further directions.

EFFECT OF ORDER

19. Notwithstanding the absence of a court seal, this Order shall take effect and be enforceable as of 3 December 2024 at 12:00pm, pursuant to the authority of the Court.

COSTS

20. No order for costs.

COMMUNICATION WITH THE CLAIMANT

The Claimant's solicitors and their contact details are as follows:

Eversheds Sutherland (International) LLP
Bridgewater Place, Water Lane, Leeds LS11 5DR
Reference: OLDFIEA/SHELL
shell.service@eversheds-sutherland.com

First Schedule

The Claimant gave the following undertaking to the Court:

1. To pay any damages which the Defendants (or any other party served with or notified of this Order) shall sustain as a result of the making of this Order, and which the Court considers ought to be paid.

Second Schedule
(list of email addresses)

1. **EXTINCTION REBELLION UK**
- 1.1 enquiries@extinctionrebellion.uk
- 1.2 press@extinctionrebellion.uk
- 1.3 xrvideo@protonmail.com
- 1.4 xr-action@protonmail.com
- 1.5 xraffinitysupport@protonmail.com
- 1.6 xr-arrestwelfare@protonmail.com
- 1.7 artsxr@gmail.com
- 1.8 xr-CitizensAssembly@protonmail.com
- 1.9 xr.connectingcommunities@gmail.com
- 1.10 xrdemocracy@protonmail.com
- 1.11 xrnotables@gmail.com
- 1.12 integration@rebellion.earth
- 1.13 xr-legal@riseup.net
- 1.14 press@extinctionrebellion.uk
- 1.15 xr-newsletter@protonmail.com
- 1.16 xr-peoplesassembly@protonmail.com
- 1.17 xrpoliceliason@protonmail.com
- 1.18 rebelringers@rebellion.earth
- 1.19 xr.regenerativeculture@gmail.com
- 1.20 xr-regionaldevelopment@protonmail.com
- 1.21 RelationshipsXRUK@protonmail.com
- 1.22 xr.mandates@gmail.com
- 1.23 socialmedia@extinctionrebellion.uk
- 1.24 xrsocialmediaevents@gmail.com
- 1.25 eventsxr@gmail.com
- 1.26 xrbristol.regional@protonmail.com
- 1.27 xrcymru@protonmail.com
- 1.28 xr.eastengland@protonmail.com

- 1.29 xrlondoncoord@gmail.com
- 1.30 XRMidlands@protonmail.com
- 1.31 xrne@protonmail.com
- 1.32 support@xrnorth.org
- 1.33 xrni@rebellion.earth
- 1.34 xrscotland@gmail.com
- 1.35 XR-SouthEastRegionalTeam@protonmail.com
- 1.36 xr.regional.sw@protonmail.com
- 1.37 talksandtraining.xrbristol@protonmail.com
- 1.38 xrcymrutalksandtraining@gmail.com
- 1.39 eoexrtnt@protonmail.com
- 1.40 xrlondoncommunityevents@gmail.com
- 1.41 xrmidlandstraining@protonmail.com
- 1.42 XRNE.training@protonmail.com
- 1.43 xrnw.training@gmail.com
- 1.44 xryorkshire.training@gmail.com
- 1.45 xrni.tt@rebellion.earth
- 1.46 talksandtrainings.scotland@extinctionrebellion.uk
- 1.47 xrttse@gmail.com
- 1.48 xrsw.trainings@gmail.com
- 2. **JUST STOP OIL**
- 2.1 Ring2021@protonmail.com
- 2.2 juststopoil@protonmail.com
- 2.3 youthclimateswarm@protonmail.com
- 3. **YOUTH CLIMATE SWARM**
- 3.1 youthclimateswarm@protonmail.com

Third Schedule Plans



— Tower Reception



**Fourth Schedule
Form of Warning Notice**

SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED

Important Notice

**High Court of Justice - Claim No QB-2022-
001259**

On 3 December 2024 and following a final hearing held on 22-23 October 2024, a final injunction was made by the High Court of Justice prohibiting anyone from entering on or remaining at any part of the Shell Centre Tower, Shell Centre, Belvedere Road, London (the “**Shell Centre Tower**”) without the owners' permission (the “**Order**”).

The Order prohibits:

1. Entering or remaining upon any part of the Shell Centre Tower without the consent of Shell International Petroleum Company Limited
2. Blocking access to any of the doors which provide access and egress to and from the Shell Centre Tower
3. Causing damage to any part of the Shell Centre Tower whether by:
 - a. Affixing yourself, or any object, or thing, to any part of the Shell Centre Tower, or to any other person or object or thing on or in Shell Centre Tower
 - b. Erecting any structure in, on or against Shell Centre Tower
 - c. Spraying, painting, pouring, sticking or writing with any substance on or inside any part of Shell Centre Tower; or
 - d. otherwise.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

Anyone in breach of the Order will be in contempt of court and may be imprisoned, fined or have their assets seized. The persons affected by the Order are Persons Unknown undertaking any of the prohibited actions listed.

This means that you must not do any of these things, or go beyond this notice and enter Shell Centre Tower without permission.

If you do, you may be sent to prison 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 Shell International Petroleum Company Limited's solicitors by email to the address specified below 48 hours before making such application of the nature of such application and the basis for it.

Copies of the relevant court documents relating to the Order, including a copy of the Order, may be viewed:-

- (i) at <http://www.noticespublic.com/>
- (ii) by contacting Alison Oldfield at Eversheds Sutherland (International) LLP on 020 7919 4500 or by email at shell.service@eversheds-sutherland.com

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(1) LEEDS BRADFORD AIRPORT LIMITED

AND THREE OTHERS

- v -

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

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, 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 ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE 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 certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex-parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the first witness statements: of Alexander James Wright dated 16 July 2024, 17 July 2024, (another) 17 July 2024; and 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden, Counsel for the Claimants and no one attending for the Defendants.

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

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to protestrequest@lba.co.uk.

DEFINITIONS

"Leeds Bradford Airport" means the land shown in red outlined in red on Plan 1 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

"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.leedsbradfordairport.co.uk/injunction>. at which copies of this Order may be viewed and downloaded).

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.
2. This Order is subject to periodic review by the Court on application by the First Claimant 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.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the First Defendant:
 - a. Uploading a copy onto the following website:
<https://www.leedsbradfordairport.co.uk/injunction>.
 - b. Sending an email to each of the email addresses listed in Schedule 3 to this Order (1) stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and (2) attaching this Order.
 - c. Affixing a notice at those locations marked with an “X” on Plan 1 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form of Schedule 4.
4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraph 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.
6. The Court will provide sealed copies of this Order to the First Claimant’s solicitors for service (whose details are set out below).

7. 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 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.
8. 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 3 and 4. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the First Defendant of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.
10. 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 Claimant's solicitors 72 hours' notice of such application by email to 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 or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.
13. The First Claimant has 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.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE FIRST CLAIMANT

The First Claimant's solicitors and their contact details are:

(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

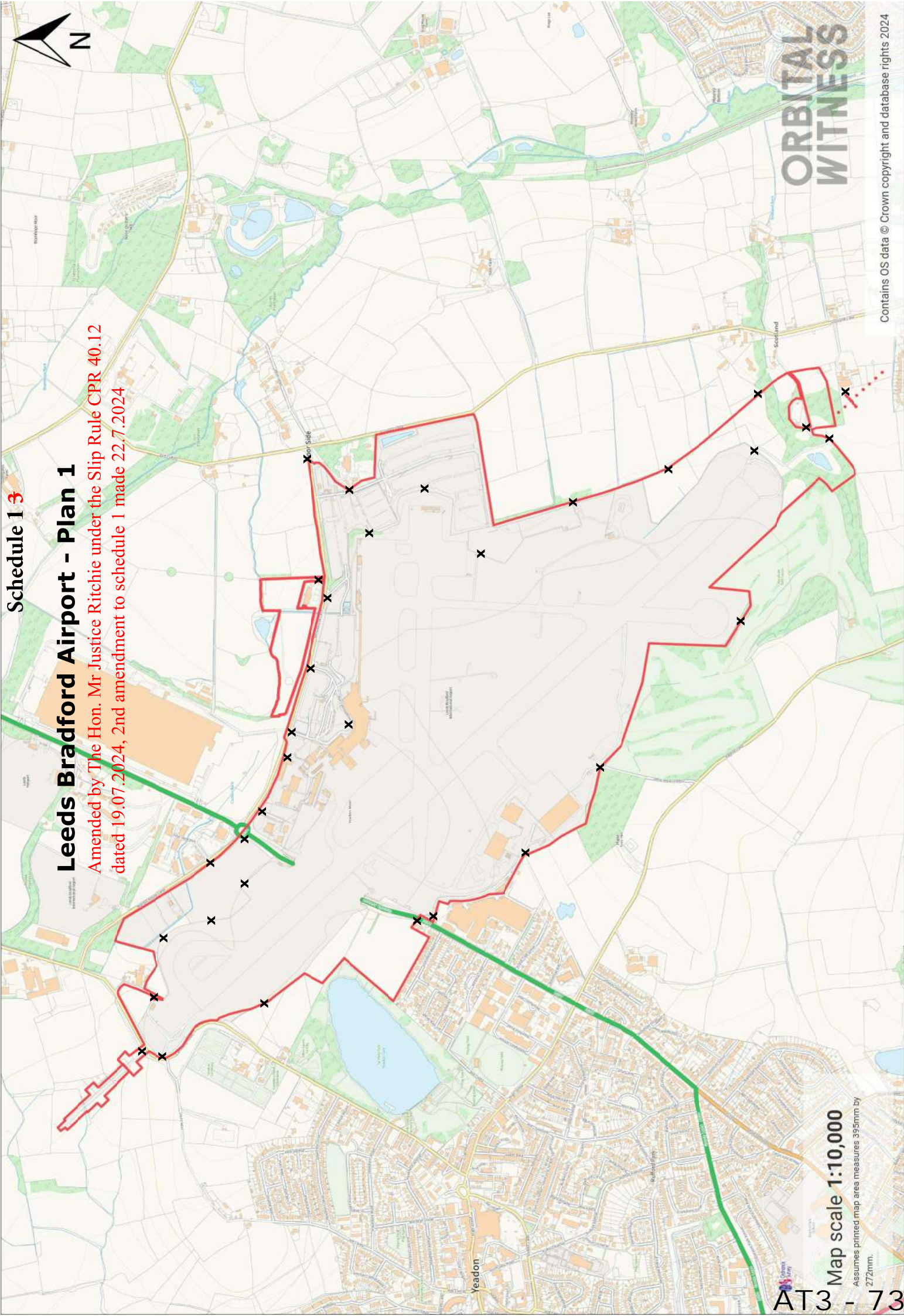
(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

Schedule 1 3

Leeds Bradford Airport - Plan 1

Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

- (1) The First Claimant will take steps to serve the First Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
- (2) The First 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 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
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 (“the Order”)

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

FROM: Leeds Bradford Airport Limited (the “**First Claimant**”)

This notice relates to the land known as Leeds Bradford Airport which is shown edged red on the Plan below (the “**Airport**”)

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

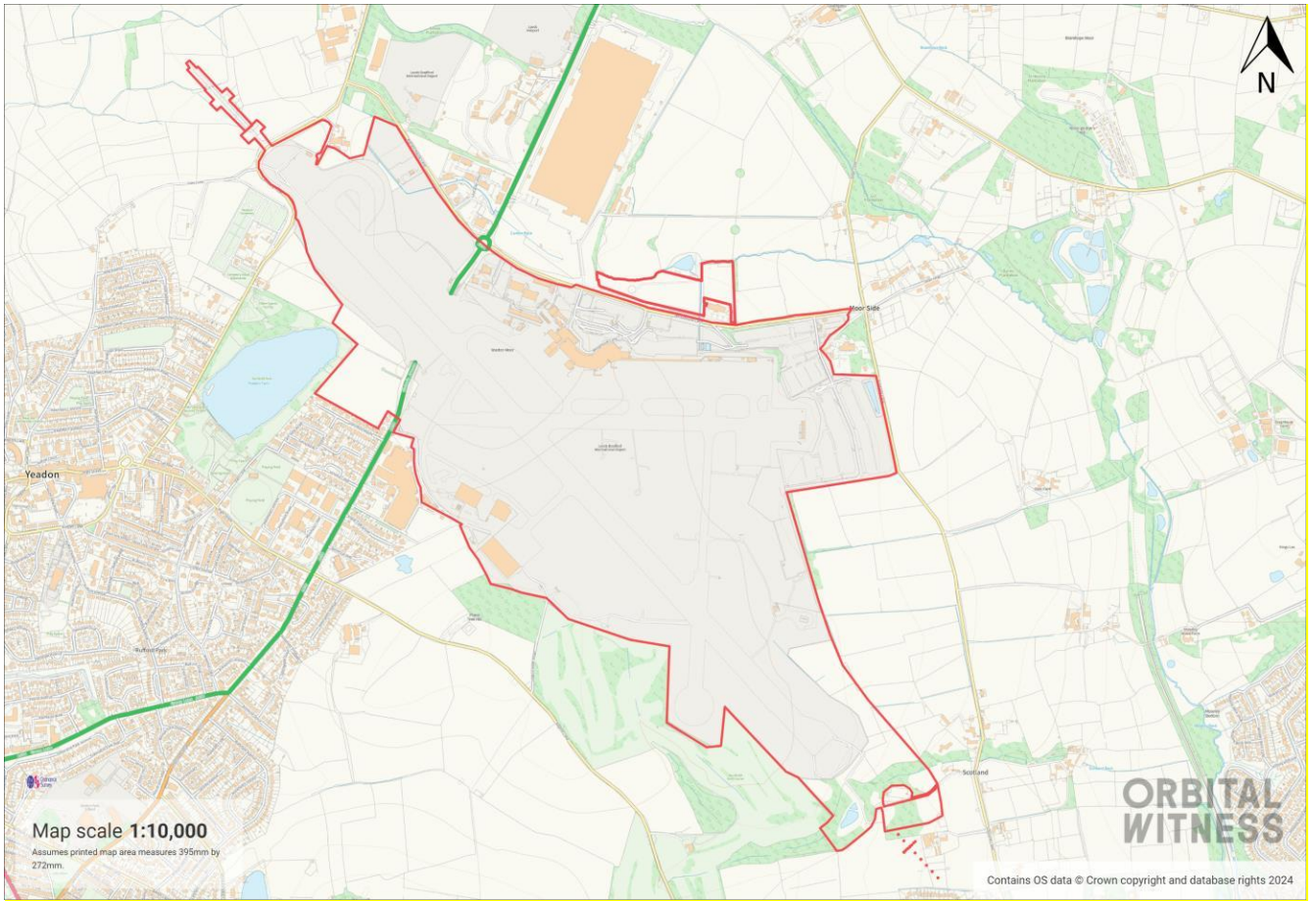
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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 the 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 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 18 July 2024 may be viewed at: <https://www.leedsbradfordairport.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.



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 . 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

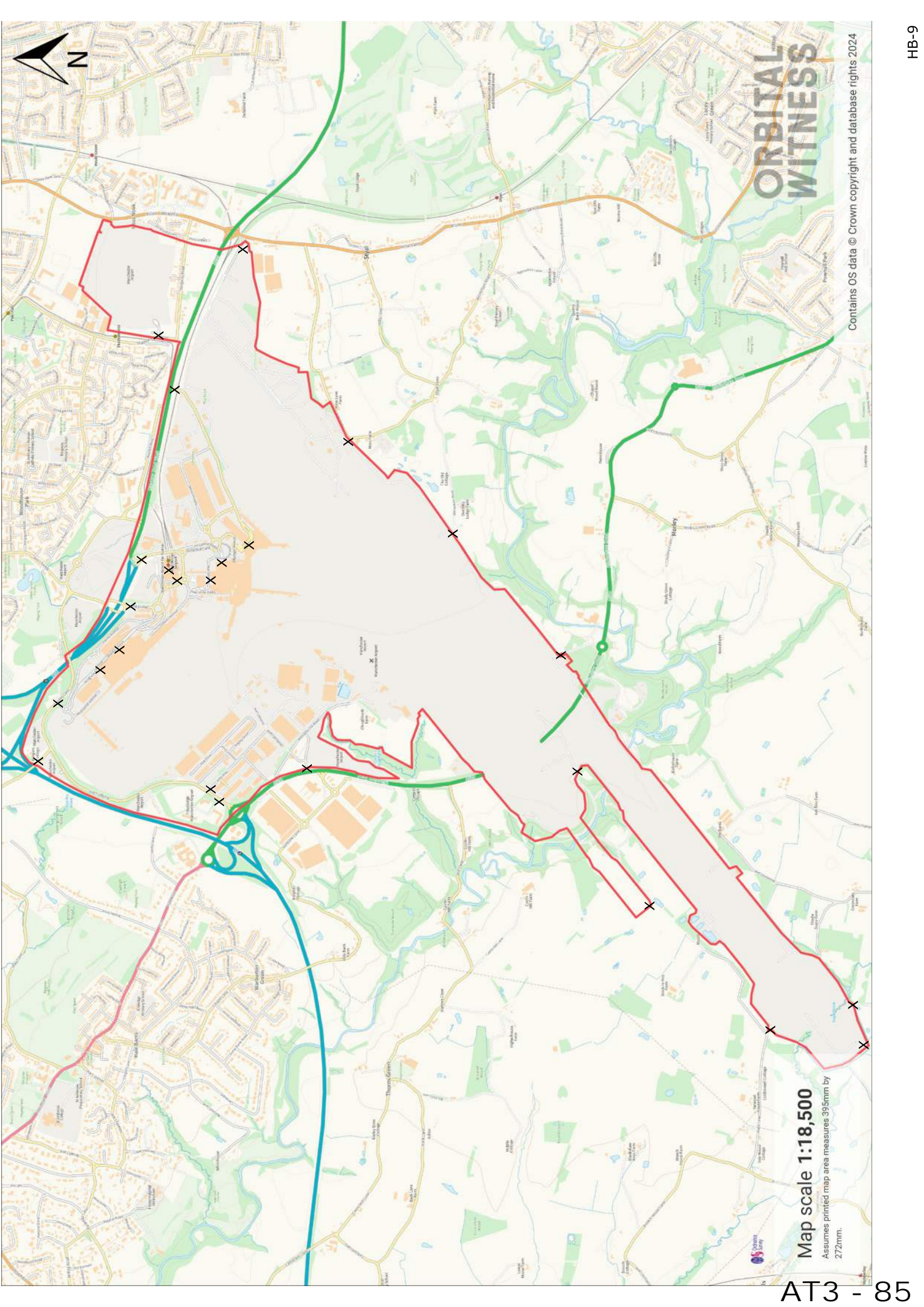
16. The First, Second and Third Claimants' solicitors and their contact details are:

(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1



ORBITAL WITNESS

Contains OS data © Crown copyright and database rights 2024

Map scale 1:18,500
Assumes printed map area measures 395mm by 272mm.



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
- 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

