

Amended pursuant to the Order of Mr Justice Ritchie dated 19 July 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim number: KB-2024-002336

BETWEEN:

GATWICK AIRPORT LIMITED

Claimant

and

PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LONDON GATWICK AIRPORT SHOWN OUTLINED IN YELLOW AND SHADED YELLOW ON PLAN 1 ATTACHED TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON GATWICK AIRPORT (AS SHOWN FOR IDENTIFICATION OUTLINED IN YELLOW AND SHADED YELLOW AND BLUE ON THE PLAN 1 ATTACHED TO THESE PARTICULARS OF CLAIM)

Defendants

PARTICULARS OF CLAIM

1. The Claimant is the operator of London Gatwick Airport, Gatwick RH6 0NP, shown outlined yellow and shaded yellow and blue on Plan 1 annexed to these Particulars of Claim ("Plan 1") ("**London Gatwick Airport**" or the "**Airport**"). London Gatwick Airport will serve around 44 million travelling passengers in 2024 and has an annual revenue of approximately £1.1015 billion.

2. The Claimant is the registered proprietor of the land on which London Gatwick Airport is situated as shown outlined in yellow and shaded yellow and blue on Plan 1, through both freehold and leasehold titles as shown in the title schedule hereto, subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.
3. Subject to those interests, the Claimant is entitled to an immediate right of possession, occupation and control of London Gatwick Airport by virtue of its respective titles as shown on the title schedule.
4. Some of the registered titles listed in Part A of the title schedule are subject to intragroup lease and leaseback arrangements. The Claimant granted long leases of various parts of London Gatwick Airport to a group company of the Claimant, Ivy Bidco Limited, for terms of 250 years and Ivy Bidco Limited leased back those areas to the Claimant for a term of 100 years, which are listed in Part B of the title schedule. Subject to paragraph 5 below, the Claimant has an immediate right to possession of those areas.
5. Certain areas within the Claimant's registered freehold and leasehold titles at London Gatwick Airport are subject to sub-leases or other occupational arrangements to third parties (the "**Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Claimant does not assert that it is the person with an immediate right of occupation or possession.
6. The Third Party Areas include certain ancillary units within the airport, such as aircraft hangars, retail units, offices, storage units and warehouses.
7. Nevertheless, access to or from the Third Party Areas by the public from outside the Airport generally involves the use of areas of London Gatwick Airport which remain unencumbered by such arrangements and in relation to which the Claimant remains entitled to possession, occupation and control by virtue of their interests shown in Part A of the title schedule.
8. By virtue of section 63 and 64 of the Airports Act 1986, the Claimant has power to make byelaws with respect to London Gatwick Airport. Pursuant to the Gatwick Airport - London Byelaws 1996 (reprinted in 2015), byelaw 3(17), 3(18) and 3(19), no person is permitted to (a) organise, take part in any demonstration, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the comfort, convenience or safety of passengers or persons using the Airport; (b) display any flags, banners or emblem likely to cause a breach of the peace on any part of the Airport; or (c) intentionally obstruct or interfere with the proper use of the Airport or with any person acting in the execution of his duty in relation to the operation of the Airport.

9. Pursuant to byelaw 3(12), no person is permitted to remain on the Airport after having been requested by a Constable or an Airport Official to leave, and no Constable or Airport Official is entitled to request a person to leave unless he has reasonable grounds to believe that the person has committed or is about to commit a breach of a byelaw or a criminal offence. "Constable" is defined as including any person having the powers and privileges of a constable; "Airport Official" is defined as a person authorised in writing by the Claimant to perform the specified functions under the Gatwick Airport – London Byelaws 1996.

The Claimant's Claims

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

- (1) The Claimant is not (or does not seek to show that it is) entitled to possession sufficient to support a claim in trespass. However, in order for its rights in relation to the other parts of London Gatwick Airport (in relation to which it is entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the Court to make an order which does not distinguish between London Gatwick Airport generally (as shown outlined in yellow and shaded in yellow on the Plan) and the Third Party Areas within them;
- (2) Further or alternatively, protest which occurs on the Third Party Areas interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimant's retained land.

The Threats

16. London Gatwick Airport has become an explicit target for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimant identifies and relies on the following non-exhaustive PARTICULARS:
17. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: *“Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations...”*
18. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called “Just Stop Oil” discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the “Airports Campaign”). At this meeting, a co-founder of Just Stop Oil was reported to have advocated:
 - (1) Cutting through fences and gluing themselves to runway tarmac;
 - (2) Cycling in circles on runways;
 - (3) Climbing on to planes to prevent them from taking off;
 - (4) Staging sit-ins at terminals ‘day after day’ to stop passengers getting inside airports.
19. Since that meeting, Just Stop Oil has announced the following on its website:

SO WHAT'S THE PLAN?

*Our Government doesn't give a f*** about its responsibilities. The country is in ruins. You know it, I know, they know it. That means it's up to us to come together and be the change we need.*

We need bold, un-ignorable action that confronts the fossil fuel elites. We refuse to comply with a system which is killing millions around the world, and that's why we have declared airports a site of nonviolent civil resistance.

We can't do this alone, we have a plan for this Summer, are you willing help make this happen?

20. It says, further:

This summer, Just Stop Oil will be taking action at airports.

As the grass becomes scorched, hosepipe bans kick in and the heat of the climate crisis enters peoples' minds, our resistance will put the spotlight on the heaviest users of fossil fuels and call everyone into action with us.

We'll work in teams of between 10-14 people willing to risk arrest from all over the UK. We need to be a minimum of 200 people to make this happen, but we'll be prepared to scale in size as our numbers increase. Exact dates and more details are coming.

Our plan can send shockwaves around the world and finish oil and gas. But we need each other to make it happen. Are you ready to join the team?

21. Just Stop Oil has also organised a fundraising page on the website <https://chuffed.org/project/just-stop-oil-resisting-against-new-oil-and-gas>, which says the following:¹

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

The secret is out – and our new actions are going to be big. We're going so big that we can't even tell you the full plan, but know this – Just Stop Oil will be taking our most radical action yet this summer. We'll be taking action at sites of key importance to the fossil fuel industry: super-polluting airports.

...

22. On 2 June 2024, Extinction Rebellion environmental activists blocked access to Farnborough Airport.
23. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at Stansted Airport. This included:
- (1) an individual using an angle grinder to cut a hole in the perimeter fence of the airport;
 - (2) two individuals trespassing the perimeter fence; and

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

- (3) spray painting two aircraft orange using a fire extinguisher.
24. On 27 June 2024, the Metropolitan Police publicised the arrests of 27 Just Stop Oil supporters planning to disrupt airports across England, including some that the police believed to be “key organisers” for Just Stop Oil.² Four of those arrested were at London Gatwick Airport.
25. The four individuals who were arrested at London Gatwick Airport were arrested as they arrived by train to the airport on 25 June 2024. The individuals were carrying suitcases full of bandages. The working assumption of the police is that either they intended to block toilets to cause flooding damage, or to access the airside areas of the Airport and use the bandages to disrupt the runway.
26. On 15 July 2024, Neil Harvey at the Claimant received an email from the Metropolitan Police warning the Claimant of potential Just Stop Oil protests at locations in England. That email stated that the police considered that potential protests at London City Airport had been deterred by the existence of an injunction in respect of that airport.
27. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will:
- (1) trespass on London Gatwick Airport; and/or
- (2) by protest conducted on or from the Third Party Areas, substantially interfere with the ordinary use and enjoyment of the airport so as to cause a nuisance actionable by the Claimant.
28. The Claimant seeks injunctive relief to prevent the apprehended trespasses and private nuisance.
29. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:
- (1) Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or

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

because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.

- (2) Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive – by which point harm may already have occurred.
- (3) Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.
- (4) The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many millions of pounds. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.
- (5) London Gatwick Airport is the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the Claimant is fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at, e.g. Stansted airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.
- (6) Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress

levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.

- (7) Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND the Claimant claims:

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

TIMOTHY MORSHEAD, KC

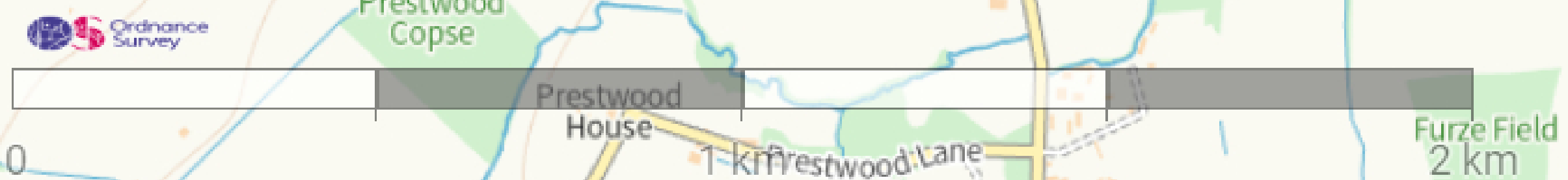
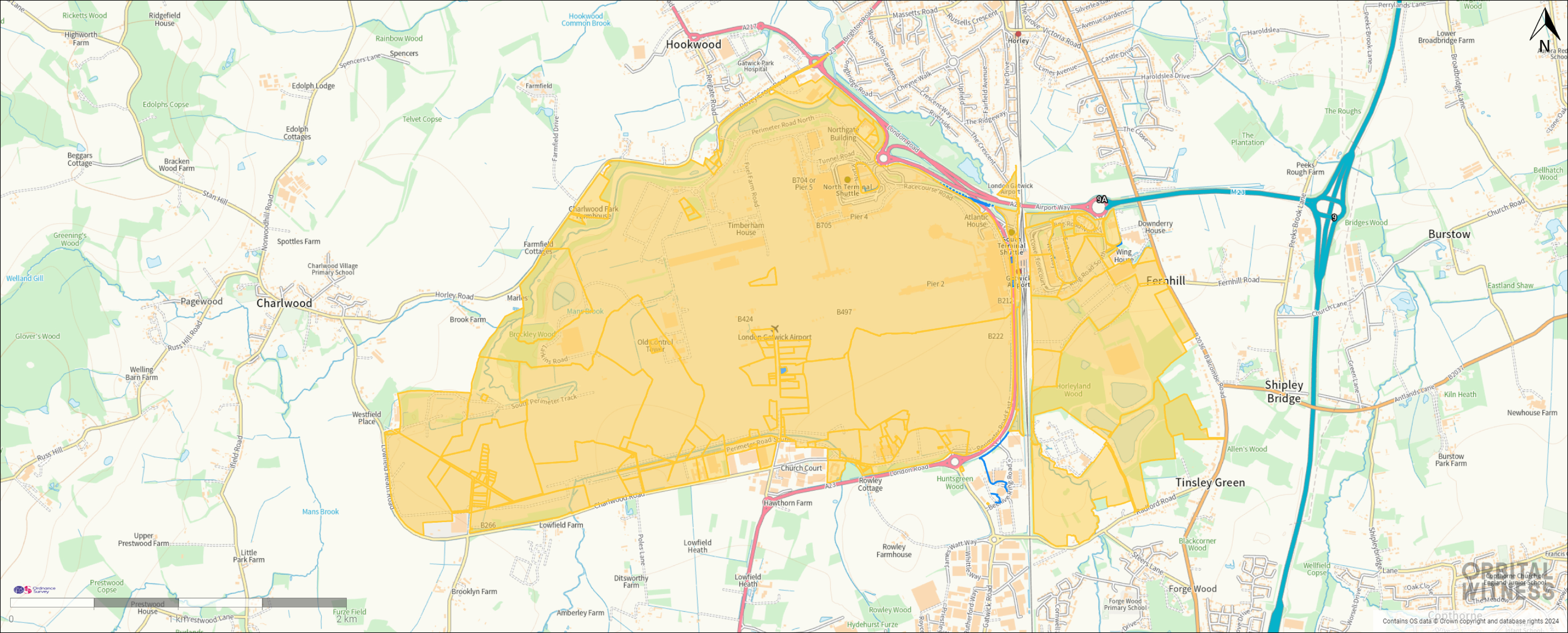
EVIE BARDEN

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

DocuSigned by:
Belen Ullamas
Signed:
19CC58F844AB42F...

GATWICK AIRPORT LIMITED

Date: 19-Jul-2024 | 16:01:22 BST



Part A

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

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

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

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

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

Part B

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

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

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

Part C

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

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

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