

GATWICK AIRPORT NORTHERN RUNWAY PROJECT CONSULTATION QUESTIONNAIRE

GACC CONSULTATION RESPONSE, NOVEMBER 2021

1. Northern Runway proposals: overall

Q. We are proposing to bring the existing Northern Runway into routine use alongside our Main Runway. Enabling dual runway operations and supporting increased passenger numbers at Gatwick would involve other changes, including to airport infrastructure and some surrounding roads. We have included proposals to mitigate the effects of the Northern Runway Project and maximise the benefits, especially to local economic growth and new jobs.

To what extent do you support or oppose our proposals to bring the existing Northern Runway into routine use?

Answer: *Strongly oppose*

Please explain your views

For the following main reasons we strongly oppose Gatwick's proposals to bring its standby runway into routine use and its proposals to grow traffic using its existing main runway.

Gatwick has not put forward a credible needs case for the development of its standby runway. The consultation material acknowledges that the airport has substantial surplus passenger and air traffic movement capacity, above 2019 levels, without development of its standby runway. Our analysis of historic growth rates shows that it has taken over 20 years for the airport to grow by the amount of surplus passenger capacity that still exists and over 15 years to grow by the amount of air traffic movement (ATM) capacity that still exists. This suggests there is no current need for development.

Based on reasonable recovery and growth assumptions, we estimate that Gatwick will not utilise its existing surplus passenger capacity until the 2050s and its existing ATM capacity until the 2040s at the earliest. When allowance is made for impacts of the pandemic and increasing climate awareness on air travel, and for future economic or other shocks, it is very likely that there will never be a need for additional capacity at Gatwick.

By contrast Gatwick's air passenger and ATM forecasts are characterised by excessive and unsubstantiated optimism. They assume sustained levels of growth in the period before and after 2029 that are substantially out of line with recent pre-pandemic growth and which Gatwick has not achieved historically. In addition they do not make any allowance for the impacts of the pandemic and increasing climate awareness on air travel, or for future economic or other shocks.

Gatwick has told us that the figures are intended to represent a worst-case scenario to enable environmental impacts to be assessed. Whilst they might be suitable for that purpose they do not in our view constitute a reasonable basis for assessing the need for additional capacity. Gatwick should commission and publish independent forecasts for a range of scenarios and provide a full analysis of the assumptions made and the rationale in each case.

More specifically Gatwick's case for the development does not comply with government aviation policy. The Airports National Policy Statement requires airports (other than Heathrow) that are seeking to expand to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow. Gatwick has not done so and is unlikely to be able to do so given the extensive overlap between the markets it and Heathrow serve and the clear preference of airlines to operate from Heathrow. This a fundamental omission: because it fails to set out a needs case that is consistent with government policy the consultation is not fit for purpose.

The Committee on Climate Change has advised that there is no need for additional airport capacity in the UK and that any net expansion would have unacceptable climate change impacts.

Gatwick's presentation of the asserted employment benefits of the proposed development is misleading: the analysis carried out by its consultant, Oxera, states that the project is not expected to result in material net job creation at the national level. Any local or regional job creation would be by displacement from other regions and therefore likely to be inconsistent with the government's levelling up agenda. This is not acknowledged in Gatwick's consultation summary or overview.

Gatwick's assessment of the economic benefits and costs of the proposed project is based on unsupportable or out-of-date assumptions, together with omissions and errors. Correction of these assumptions, omissions and errors would have a very significant effect on the overall benefit-cost of the proposed scheme. It is likely that the scheme in fact has a negative net present value and therefore represents a highly unattractive proposition from a public interest perspective. We are submitting with our response a report by consultants the New Economic Foundation that expands on these comments.

Gatwick's proposals would increase the airport's CO₂ emissions by almost 50%. If it were permitted to expand as proposed, Gatwick alone would be responsible for 5.5% of the entire UK's emissions by 2038. An increase in emissions of this (or any) magnitude would be inconsistent with Government policy and would clearly have a material impact on the UK's ability to meet its carbon reduction targets. It would be wholly unacceptable to allow CO₂ increases and other climate and community impacts on this scale to facilitate any increase in air travel but most particularly to facilitate an increase in the leisure travel market that Gatwick primarily serves, predominantly for the benefit of frequent flyers.

The consultation recognises that there are presently no proven measures by which Gatwick's emissions could be mitigated and that the trajectory of the aviation industry to net zero emissions is unclear. Any growth at Gatwick should be conditional on it achieving a progressive, material reduction in the total climate impacts (including non-CO₂ impacts) facilitated by the airport from a 2019 baseline. A reduction trajectory should be set, independently monitored and enforced.

Gatwick's expansion would have substantial noise consequences for local communities and is inconsistent with the government's aircraft noise policies. Government policy requires the industry to reduce and mitigate noise as airport capacity grows. Gatwick is instead proposing that noise should be allowed to increase as a result of the proposed growth, rather than reduce. Government policy also requires the benefits of future growth in aviation to be shared between the aviation industry and local communities but Gatwick has made no attempt to do so. It is proposing to grow by over 70% in passenger terms and 35% in commercial aircraft movement terms compared to 2019. Benefits to the industry would be very substantial. By contrast, the airport's noise impacts would increase substantially before potentially declining modestly from new record levels. There would be no benefits for communities. The airport's noise proposals are therefore not compliant with government policy and must be materially revised.

Gatwick's noise envelope proposals are wholly one-sided, use inappropriate metrics and limits, do not comply with government policy, lack adequate enforcement arrangements and have been put forward without stakeholder discussion, in contravention of CAA guidance and in stark contrast to the approach taken by other airports. For these and other reasons they are unacceptable and require substantial revision. At a minimum any noise envelope should contain absolute passenger and ATM caps, limits on the frequency of noise events above specific sound levels using N above metrics and Leq limits. In each case the limits should be set at levels that achieve a genuine sharing of benefits as required by government policy. A noise envelope development group, including all stakeholders, should be set up to develop alternative proposals.

The scale of construction works being proposed demonstrates that this is not a scheme that is appropriate to be considered under the 2018 Making Best Use of Existing Runways policy. That policy addresses the case for making "more intensive utilisation of existing infrastructure". Gatwick's proposals involve wholesale rebuilding of large elements of the airport and its supporting infrastructure. The airport appears to be seeking to bend the rules of this policy. Its proposals should therefore be considered alongside the findings of the Airports Commission, which ruled against creation of a second operational runway at Gatwick.

The airport's proposals in each of these and other respects are unacceptable. The airport should not be permitted to grow or expand unless and until it is able to demonstrate that it can do so whilst at the same time reducing in a proportionate and balanced way all adverse environmental, noise and other impacts of any

growth. Reduction should be from a 2019 baseline so the cumulative effects of growth are fully addressed.

Our firm view is that there should be no expansion at Gatwick. However, if consent for the proposed development were to be granted it should be conditional on a wide range of additional measures including:

- 1. A ban on all night flights for a full eight-hour period every night.*
- 2. A noise envelope that has been agreed with local communities and which achieves the government's policy requirement that noise must be reduced and mitigated as capacity grows and the benefits of growth shared. Noise, measured on an agreed basis and using a range of metrics, must fall from the actual levels in 2019 and the projected levels in 2029, prior to the commencement of dual runway operations, or the actual levels at that time if that is lower.*
- 3. A progressive and material reduction in the emissions and total climate impacts attributable to the airport, inclusive of emissions from surface transport and full flight impacts, from a 2019 baseline. A reduction trajectory should be set, independently monitored and enforced.*
- 4. A legally binding commitment that there would be no further runway, terminal or associated development at Gatwick including no full new runway.*
- 5. No increase in road traffic to the airport, combined with a requirement progressively to reduce the absolute number of passengers, staff and other users accessing the airport by road.*

2. Economic benefits: jobs and skills

Q. We are proposing a number of measures designed to maximise employment and skills benefits resulting from the Northern Runway Project. Do you think we could do anything more - or differently - to maximise local and regional employment and skills benefits?

Gatwick's presentation of the potential employment benefits of the proposed development is materially misleading.

The airport's consultants, Oxera, state that they do not expect the proposed scheme to result in material net job creation at the national level. This is because most jobs that might be created by the project would be displaced from other parts of the economy and other regions. Nonetheless Gatwick claims in the consultation overview document that "Additional jobs generated by the Project are expected to increase overall employment and generate additional value". This statement is not supportable and is therefore misleading.

Given the lack of national level job creation associated with the proposed scheme, any local or regional job creation would be at the expense of other regions. It would therefore be likely to be inconsistent with the government's levelling up agenda.

The economic and employment projections developed by Oxera and presented by the airport are subject to significant uncertainty and cannot in our view currently be relied upon. In particular Oxera's work:

- ! *has provided no evidence of a causal link between air travel growth and employment growth;*
- ! *is based on dated studies that do not adequately reflect more recent emerging evidence of the saturation of developed country transport markets and may not be appropriate for application in 2021; and*
- ! *fails to present a number of more recent peer-reviewed studies which could not evidence a causal link between air travel growth and employment.*

In addition Oxera have failed to take any account of the employment impacts on the UK tourism economy of increasing outbound tourist trips and must do so.

We are submitting with our response a report by consultants the New Economic Foundation that expands on these comments.

Oxera's work may also underestimate the effects of the airport's and the broader aviation industry's drive to automate jobs, which is likely to accelerate as a result of the pandemic. The long term 'job intensity' of aviation (i.e. the number of jobs per passenger) has been falling consistently for more than a decade.

Finally, we do not support the notion that it is a good economic strategy to increase the dependence of the local economy on additional employment at or related to Gatwick. The extreme vulnerability of the local economy to airport-related jobs has been reflected in higher unemployment around Gatwick than other regions throughout the Covid-19 crisis. Instead of the increased economic reliance on Gatwick that this development would lock in, we believe the local economy would be better served by economic diversification created by responding to the climate emergency. This alternative will increase long-term economic resilience, as set out in the Green New Deal for Gatwick report available here: <https://www.greennewdealuk.org/updates/a-green-new-deal-for-gatwick/>.

3. Economic benefits: business and the economy

Q. We are proposing a number of measures designed to maximise benefits to business and the economy resulting from the Northern Runway Project. Do you think we could do anything more - or differently - to maximise benefits to business and the economy?

Gatwick's assessment of the economic benefits and costs of the proposed development is based on unsupportable assumptions, omissions and errors. We note the following points in particular:

- ! *The assessment assumes the Covid-19 pandemic will have no medium to long-term impact on passenger demand. This is wholly inconsistent with the experience following previous economic/societal shocks, including at Gatwick Airport, and with the views of most informed commentators and the government. It is not a plausible basis for evaluating the proposed development. Gatwick should test an alternative scenario in which the*

pandemic has a more significant lasting impact on air travel than has been explored in the presented scenarios.

- ! *Gatwick has assumed that the airport's total proportion of business passengers will remain at around 13% and that there will be an absolute increase in business passenger numbers of around 1.5 million from 2032 onwards. There is extensive evidence that UK business travel had stagnated prior to the pandemic (total UK business air travel has never regained its 2006 peak) and it is very widely expected that business travel will decline materially post-COVID. There can therefore be no confidence of any growth in business air passenger travel as a result of this project. Even if there was growth in Gatwick business traffic, it is likely that this would be displaced from other airports and therefore have no net national economic benefit.*
- ! *Asserted business travel benefits make up between 65% and 75% of the proposed scheme's total user benefits, which in turn make up virtually all the scheme's claimed net social benefits and net present value. All of these numbers should be re-presented using alternative more realistic assumptions reflecting zero business travel growth or a decline in business passenger numbers.*
- ! *Many of the claimed economic benefits of the proposed scheme arise from the displacement of activity from other parts of the economy and other regions. Displacement is unlikely to be consistent with the government's levelling up agenda. In addition, displacement from other airports to Gatwick is implausible: Gatwick has recovered more slowly from the pandemic than any other major UK airport suggesting it is not preferred by airlines and that its ability to attract traffic from them will be limited.*
- ! *No assessment of the impact of the proposed expansion on the UK tourism economy has been conducted. Given the fact that Gatwick's main function is to move UK residents overseas on international leisure trips this is highly irregular and contravenes guidance in both the Treasury's Green Book and the Department for Transport's Transport Analysis Guidance. Gatwick must set out expected changes in outbound tourist trips, quantify their impact on the UK's tourism economy and balance of trade and analyse these against the government's tourism policies. It is likely that the incentivisation of outbound tourism arising from the proposed project would cause significantly negative impacts that have been omitted from Gatwick's analysis.*
- ! *Gatwick's estimate of the monetised value of the greenhouse gas emissions resulting from the project is incorrect, based on flawed methodology and uses out-of-date input values. Use of the correct carbon values for appraisal will significantly increase the net present value of carbon costs. The carbon costs calculation must be re-run using current values and actual emissions forecasts for every year for which they are available rather linear interpolation between years.*
- ! *International emissions (specifically inbound flights) and aviation's non-CO₂ climate impacts have been omitted in contradiction of government guidance. The value of non-CO₂ climate impacts should be quantified and shown alongside the carbon costs. The value of the emissions resulting from inbound air traffic movements should be quantified and presented in the economic analysis.*

- ! *Gatwick's presumption that airport expansion has positive national economic benefits is neither substantiated nor supported by the evidence in the latest academic literature or the evidence presented by Oxera. Many studies have struggled to identify a causal relationship between higher air passenger numbers and increased GDP growth in more developed nations. Some studies have found a negative relationship, with others suggesting this may link to the extractive impacts of aviation in regions with a heavy bias towards outbound tourism. Oxera's estimate that output increases associated with the project are worth £4bn to £5.8bn is based on the application of a simple multiplier which was calibrated in 1999 and may no longer be applicable.*
- ! *Gatwick's estimate of £4.7bn of government revenue benefits is unsubstantiated and not supported by Oxera's analysis. Oxera explain that potential increases in Air Passenger Duty receipts cannot be considered to equate to overall gains in government tax revenues because they may be offset by reduced tax take in other areas of the economy. This error should be corrected. It is possible that the scheme could result in a net reduction in tax revenues.*

Correction of the above unsupportable assumptions, omissions and errors would have a very significant effect on the overall benefit-cost ratio of the proposed scheme. It is likely that the scheme in fact has a negative net present value and therefore represents a highly unattractive proposition from a public interest perspective. These factors and others are set out more fully in the economic analysis carried out for the Gatwick Area Conservation Campaign by the New Economics Foundation which we are submitting as part of our response and which Gatwick must address fully.

4. Airport supporting facilities

Q. We would need to change or relocate some facilities to accommodate the proposed alterations to the existing Northern Runway. Some new, additional facilities would also be needed. These changes would be largely within the current airport boundary. The current Central Area Recycling Enclosure (CARE) facilities would be relocated. We are considering two potential locations for the CARE.

1. Option 1: to the north of the cargo hall (north east of the proposed Pier 7) Do you think this location is:

! Appropriate ! Inappropriate ! Don't know

2. Option 2: to the north west of the proposed Pier 7
Do you think this location is:

! Appropriate ! Inappropriate ! Don't know

Please explain your views.

No comment.

5. Landscape and ecology

Q. Our proposals include keeping green space wherever possible, protection of important environmental and community assets, improved landscaping, provision of public open space and footpaths, and the creation of new habitats. What are your views on our landscape and ecological proposals?

The Environment Bill requires development to have an overall positive impact on biodiversity and the environment. It is not clear how expansion of Gatwick Airport, with a 35% increase in flights, additional land-take and wider impacts can have the required positive impact.

The development would increase air and light pollution and noise impacts on sensitive habitats around the airport.

It is well known that noise and light pollution have various impacts on wildlife, often detrimental. The life cycles of insects are disturbed by unnatural light at night; the communication between birds is disturbed by noise; predator and prey relationships are interfered with by noise and light; moths, which are declining in the UK, are attracted to lights, where many die; migrating birds can be affected by light at night.

Airports are inhospitable locations for many birds, including geese, herons, gulls, pigeons and starlings, due to fear by the aviation industry of birdstrike. Airports use a number of measures to deter birds locally, and are able to prevent the creation of features such as ponds, within about 13km of a runway, for fear that these will attract birds. More planes using Gatwick will further increase the fear of bird strikes, and therefore measures to make a wide area unattractive to birds.

The interference caused by the expansion will inevitably have negative effects on some sensitive habitats around the airport.

The tranquillity of the countryside over large areas of Surrey, Kent and Sussex will be reduced due to planes overhead, with few entirely quiet and peaceful places to which people can go for rest and relaxation. The ability to escape noise, and enjoy quiet countryside, is highly valuable for good mental health.

A huge airport, brightly lit for 24 hours each day, will reduce the pleasure people take from seeing the stars and planets, if an area is sufficiently dark at night.

In addition, if the aviation industry attempts to produce allegedly "sustainable" fuels, produced from crops or crop wastes, this will have a negative impact on the biodiversity in the areas (perhaps not in the UK) where they are grown. This would be an extra negative impact of Gatwick's expansion.

Gatwick's expansion would have many seriously negative impacts on green space, landscape and nature.

6. Land use: overall

Q. We have aimed to develop the Northern Runway Project largely within the current footprint of the airport to minimise disruption to our neighbours and make efficient use of our land. Where we are planning to use land temporarily during construction, we are also proposing to restore it to its previous use once construction is complete. What are your views on our approach to land use?

The current proposal does not limit the development to within Gatwick's perimeter. We do not support additional land-take either for construction purposes or long-term use. A public transport led surface transport strategy would negate the need for much of the footprint expansion proposed by the airport.

The additional area that is in the Crawley Local Plan as 'Gatwick Green', that Gatwick has proposed should be allocated for car parking, would not be required if all additional surface transport was provided through public transport, as was proposed in relation to Heathrow's proposed expansion.

The additional permanent development allocated as balancing ponds associated with the junction improvements would not be required if the development did not lead to an overall increase in road traffic.

The use of the Surrey County Council tenant farmed land north of the South Terminal roundabout as a construction site and location for a balancing pond is not supported. Turning a locally popular pick-your-own potato farm and equestrian centre into a construction site is not appropriate.

Shifting to use of public transport rather than road traffic for the increased surface transport journeys would not only align to the transport decarbonisation strategies of surrounding Councils but reduce the amount of additional hardstanding, and therefore the flood risk to those living downstream near the river Mole. Any rainfall event with greater flood intensity than modelled by Gatwick is likely to result in flooding. Increased climate change in the future will increase flood risk and should be fully factored into the modelling.

All flood mitigation measures should be fully implemented prior to construction works that extend the areas of hardstanding, such that there is also no short-term increase in flood risk.

Location of new housing required for workers, how it will be sufficiently affordable, and how its location impinges on the Green Belt and affects the need for sustainable transport provision for workers travelling to and from the airport must be fully assessed.

7. Getting to and from the airport: our approach

Q. Almost half of Gatwick's passengers already use sustainable modes of transport to get to the airport. To support the Northern Runway proposals, our

transport strategy aims to continue increasing the overall share of passengers using public transport to get to and from the airport, deliver improvements to local highways and junctions, and encourage greater use of public transport and active modes by our staff. Do you think we could do things better, or differently, to ensure all passengers and staff have appropriate choices for accessing the airport?

The main aims of Gatwick's strategy for surface access are contradictory. On the one hand, the airport says it will aim to increase the use of sustainable transport by passengers and staff. On the other hand the strategy proposes increases in highway capacity and car parking. Most of GAL's own transport investment proposals support the second of these aims, leading to an increase in highway and car parking capacity

The airport's proposals would result in a steady and substantial increase in car travel to the airport, with the number of passengers accessing the airport by car in 2047 over 40% higher than in 2019 (see PIER Appendix 12.9.1, Table 7.6.5). To accommodate this increase the airport is proposing provision of over 25,000 additional car parking spaces compared to current levels and substantial highway capacity enhancements. In addition increased vehicle movements are predicted for the proposed doubling of freight as well as the LGV and HGV movements to service increased day-to-day airport operations and maintenance.

Gatwick aims to increase the share of passengers using sustainable transport to 60% by 2030, increasing from 45% in 2018. Project modelling estimates that a mode share of 54% and 56% will be reached between 2029 and 2047. An even lower outcome is achieved for employees, with a 47% mode share achieved and the airport acknowledges that further measures are required.

These figures are not acceptable. Gatwick's commitment to achieving 60% sustainable transport by 2030 but would remain unfulfilled by 2047. There should be no increase in the number of passengers accessing the airport by road and no increase in highway trips, matching the commitment made by Heathrow in its expansion proposals.

Whilst Gatwick's proposals do not reach their own targets, even this level of passenger mode share change is surprising given the absence of credible plans to deliver a sustainable mode share and that most of the project's surface transport investment is targeted at improvements which support car travel. It is notable that highway demand levels are forecast to be high enough to cause localised congestion even with the proposed capacity enhancements.

The behavioural choices of passengers and airport workers are particularly uncertain following the Covid-19 pandemic, with many people still reluctant to use public transport, therefore the predictability of mode share is even more uncertain. One way of examining the implications of this is to test the modelling and assessment of the impacts of airport expansion in a range of scenarios, which should include a lower shift to public transport in line with recent trends.

In any case, the plausibility of the modelled mode share results should be confirmed and an explanation provided of the basis on which they were made. The airport must also demonstrate that it has taken full account of the likely increase in road traffic in South-East England over the next few decades arising from increased population and infrastructure.

In contrast to the substantial new investment proposed for the highway network and car travel, investment in public transport amounts to rather vague proposals to work with local bus operators to support a limited number of bus routes serving the airport and additional infrastructure to transport passengers from rail platforms into the airport. Gatwick is relying on already committed rail enhancements to support the additional passengers that will use the airport. The impact of other users of this rail corridor switching from road to rail transport but not travelling to and from the airport is not considered and should be.

Increased public transport provision for airport workers must reflect their shift working patterns and the locations of anticipated homes for airport workers. Gatwick notes that it has monitored the house building programmes of 17 council areas around the airport. This must be reflected in the proposals for sufficiently frequent and early/late-running bus services beyond the current fastway routes.

Gatwick must model the public transport investment required to service all the increased journeys to and from the airport by passengers and airport workers. Increased public transport provision (both up-front infrastructure and any on-going service costs) must be fully funded by the airport such that funding is not diverted from decarbonisation of existing transport to serve Gatwick's needs.

Gatwick says it will improve cycle parking, lockers and showers, and will provide some pedestrian and cycle improvements at several locations for staff who live near the airport. Whilst useful, these proposals will benefit only a small number of people and are unlikely to encourage a significant shift in the use of active travel modes.

Gatwick's proposals are inadequate and unacceptable. There should be no increase in the number of passengers accessing the airport by road and no increase in highway trips. This must be modelled and provided for in its proposals. Instead the airport should ensure provision of sufficient public transport capacity to accommodate all the additional demand and be required progressively to reduce the absolute number of passengers, staff and other users using road transport as a condition of any expansion. A reduction trajectory should be set, monitored and enforced.

8. Road improvements

Q. We propose to significantly enhance the roundabouts at North Terminal and South Terminal (including by raising the M23 Spur/ Airport Way to take through-traffic above the existing roundabout) as well as improving Longbridge Roundabout by widening lanes to provide extra capacity. These improvements are necessary even with our strategy to promote the use of public transport and

will cater for both airport and general traffic growth. What are your views on our proposals to improve local junctions to support airport growth as well as provide capacity for local traffic? Please specify the improvements to which your comments refer.

As stated above we do not accept Gatwick's premise that the volume of unsustainable road transport should be expanded to support the airport's planned growth. Gatwick should model and provide for all increases in its surface transport through public and active transport alone. It must then invest in these modes, not increased road capacity. This would remove the need for the works proposed on these roundabouts, remove the need for the additional parking proposed, and enable Gatwick to align its transport investments to the 'Avoid-Shift-Improve' decarbonisation plans of Surrey and of West Sussex.

9. Public and sustainable transport

Q. Our proposed target of 60% of journeys by sustainable transport to and from the airport by 2030 would be the highest for a major UK airport. We are proposing measures both to encourage public transport use and discourage unnecessary use of private cars by both passengers and staff. For our employees this includes promoting cycling and walking, car sharing and using zero emission vehicles where travelling by car is the only option. This describes our overall approach but there are specific things we propose in some areas, for example around Crawley and Horley. What are your views on how our proposals for increasing use of public and sustainable transport apply in your area? Please specify the proposals to which your comments refer and tell us if there are other things we could do that would be relevant to your journeys.

Gatwick's proposed sustainable transport target is inadequate, misleading and unacceptable. The increase in passenger numbers the airport is seeking far outweighs the proposed increase in sustainable transport use. The airport's proposals would therefore result in a steady and substantial increase in car travel, with total passengers arriving by car in 2047 over 40% higher than in 2019. The level of investment proposed in road transport and the insufficient proposed increase in public transport is inconsistent with the government's and local Councils' plans to decarbonise transport. These require net reduction in car travel and a shift to public and active travel instead. New public transport routes as well as increased travel on existing routes is required.

The airport's plans for increasing public transport mode share lack credibility and ambition. There should be no increase in the number of passengers accessing the airport by car and no increase in highway trips. Instead the airport should be required to reduce the absolute number of passengers accessing the airport by car and the number of highway trips as a condition of any expansion. A reduction trajectory should be set, monitored and enforced. All necessary surface transport investments should be funded by the airport and required to be completed before the anticipated increase in passengers.

We comment below on the airport's proposals.

Road

As set out in our answers to questions 7 and 8 we see the main aims of Gatwick's strategy for surface access as contradictory. On the one hand, the airport says it will aim to increase the use of sustainable transport by passengers and staff. On the other hand the strategy proposes increases in highway capacity and car parking. This is because the increase in passenger numbers the airport is seeking far outweighs its sustainable transport proposals. The airport's proposals would result in a steady and substantial increase in car travel to the airport, with total passengers arriving by car in 2047 over 40% higher than in 2019. The proposals reflect this increase in road traffic movements to and from the airport through the provision of an additional 25,000 car parking spaces.

Gatwick has recently benefited from a re-alignment of the junction with the M23. While this improvement is needed, and may reduce delays, it does nothing to reduce commuting by road. The airport is not well connected to other economic centres by road, it should be noted that the M23 stops just south of Crawley and only goes north as far as the M25, Britain's most congested motorway.

Rail

Gatwick Airport station is on the Brighton to London main line. Gatwick's publicity makes much of its "excellent rail connections" but in practice the main connections are to Brighton and to London Victoria and are normally heavily used with high levels of crowding. Victoria has insufficient platforms, resulting in delays outside the station. Overcrowding on the Brighton-London line is severe during the rush hours. Gatwick says its rail modelling shows that no significant crowding is expected to result from its proposals, assuming delivery of improvements planned by Network Rail. Nevertheless, the project accounts for an increase of up to 4% of people standing on busy commuter services through south London and the impact will be exacerbated by the presence of luggage.

Rail crowding should be examined and reported as part of a series of sensitivity tests reflecting the range of demand scenarios that could emerge.

Low levels of project investment in sustainable travel

In contrast to the substantial new investment proposed for the highway network and car travel, proposed investment in public transport amounts to rather vague proposals to work with local bus operators to support a limited number of bus routes serving the airport and provision of additional infrastructure to transport passengers from rail platforms into the airport. Gatwick is relying on already committed rail enhancements to support the additional passengers that will use the airport. The impact of other users of this rail corridor switching from road to rail transport is not considered and should be.

These proposals must reflect the origins of anticipated journeys for both passengers and employees that currently travel to work in private cars.

Sustainable travel options must be both more convenient and incentivised financially.

Increased congestion and need for sensitivity testing

In terms of impacts of the project and surface access proposals on highway network performance, Gatwick reports, pending further micro-simulation modelling, that even with the highway capacity improvements its surface access proposals will still cause local congestion which they refer to as 'manageable'. A range of sensitivity tests should be carried out which assume a lower than predicted shift to public transport and higher background growth in car traffic.

Gatwick's proposed expansion will further affect an area that is already suffering the effects of a mismatch between growth and the ability of the transport (and other) infrastructure to cope. It is also the case that there is a significant number of commuting journeys in and out of nearby Crawley leading to daily congestion as well as high levels of air pollution. This is also generating heavy traffic on local rural roads, including through the villages of Charlwood and Ifield. The area is becoming a focus for new development, leading to pressure for housing and urban sprawl, which will lead to further congestion on local transport routes.

Increase in cargo movements

The airport generates goods vehicle movements to distribute air cargo and goods for the operation of the airport and aircraft. In 2019 there was 150,000 tonnes of cargo, and this is expected to more than double by 2047 if airport expansion is approved. Gatwick notes that, based on current operations, cargo handlers typically expect 50 to 60 LGVs and HGVs per day.

Whilst a small proportion of overall traffic, HGVs have a more significant impact in terms of greenhouse gas emissions, air pollution and noise. The use of recommended transport routes to and from the cargo facility helps in separating this traffic however there is no enforcement of these routes and local communities suffer from excess HGV traffic.

The anticipated increase in traffic required to service the operations and maintenance of the airport should comply with an aim of a 'no net increase in road transport' envelope at the airport. This new public-transport led strategy must be modelled and sit at the heart of Gatwick's surface transport investment plans.

Air quality

Air pollution is noted to be the biggest public health threat in the UK. A 2016 study by the Royal College of Physicians put the number of premature deaths caused by air pollution annually at around 40,000 in the UK, primarily due to nitrogen dioxide (NO₂) and particulates (notably PM_{2.5}). Expanding Gatwick risks increasing emissions both from the additional flights and from the growth in road transport to the airport.

In September 2021 the World Health Organisation (WHO) strengthened its recommended limits to 10 micrograms (one-millionth of a gram) per cubic meter air, or $10\mu\text{g}/\text{m}^3$ annual mean for NO_2 and $5\mu\text{g}/\text{m}^3$ annual mean for PM_{10} particles. There is also increasing evidence that ultra-fine particles have health impacts and that airports are a significant source of such particles.

Gatwick should be required to propose and enact plans that ensure its development complies with these latest WHO guidelines and adequately address ultra fine particle risks. The WHO notes that almost 80% of deaths related to PM_{10} could be avoided globally if current air pollution levels were reduced to those proposed in the updated guideline. Whilst Gatwick Airport note that they expect the development will reduce air pollution this is still not in line with current WHO guidelines and does not acknowledge how small particulates in tyres and brake pads persist even with the anticipated shift to electric vehicles.

All aspects of air pollution, including NO_2 , particulates and ultra-fine particles must be modelled and reduced both within the airport boundary and in areas affected by flights and/or surface transport around the airport. Applying such a strategy to Gatwick's development plans would be consistent with ensuring that there is no increase in road traffic to and from the airport as noted above.

Accidents

Increases in traffic, whether from cars or goods vehicles, are likely to lead to an increase in accidents especially where traffic is concentrated in areas neighbouring the airport, including towns such as Horley, Horsham, Dorking, East Grinstead and Crawley. The reliance on smart motorways as the main strategic transport routes to the airport also increases accident risk.

10. Construction: managing impacts

Q. We are committed to being a good and responsible neighbour throughout the construction phase, giving consideration to both the local community and managing the environmental impacts of construction activity. While still to be finalised, we have included indicative details of anticipated construction methods, timings and phasing. These will be refined throughout the Environmental Impact Assessment process, but we will seek to incorporate best practices. Are there any particular measures or activities for managing construction impacts that you would like us to consider including in our proposals as construction details are defined?

The additional noise, air pollution, climate and local transport impacts of the proposed construction works (including of the proposed changes to surface access) must be fully modelled and mitigated such that there is no short-term increase in air pollution, traffic congestion or noise at the airport.

The carbon impact of construction should be fully accounted for within a carbon budget for Gatwick Airport that reduces year on year in line with overall government carbon budgets.

11. Construction: transport

We are proposing a package of measures to manage construction related traffic following best practice. This includes the routes vehicles take, the time they travel and measures to reduce the number of vehicles by re-using materials on site as much as possible. Our aim is to minimise the impacts of construction on local roads, keeping traffic on the strategic road network wherever possible. What are your views on our construction transport proposals?

Whilst Gatwick states that the construction phase will follow the guidelines of the Code of Construction Practice (Appendix 5.3.1) the details are not known until negotiated with the local authorities. However the construction phases are proposed to involve round-the-clock work for the first five years (2024-2029) with a further period of up to ten years of significant works thereafter. The code will provide restrictions and approved routes for construction road traffic. Anecdotal evidence shows that, particularly with sub-contracted transport companies, the adherence to these routes is not properly enforced and there are limited enforcement processes available. Thus the potential of significant HGV traffic 24 hours a day, seven days a week on unsuitable local roads is high. Equally, whilst Gatwick suggests construction workers will be encouraged to use the public transport system, it is well known that the shift nature of the work and the itinerant nature of the workforce is such that own transport is more likely to be used. This is not addressed in the transport strategy.

12. Managing and mitigating effects: climate change and carbon

Q. We are proposing to mitigate increased greenhouse gas emissions associated with the Northern Runway Project with improvements in design and other measures. We are also developing a Carbon and Climate Change Action Plan that will demonstrate how we will continue to reduce carbon emissions from the airport and ensure Gatwick does not compromise the net zero UK carbon target. Do you have any comments on our approach or suggestions for specific measures to be incorporated into the Action Plan?

Gatwick's plans are inconsistent with the need to stay within 1.5! C global warming, reiterated at the COP26 climate summit in November 2021. If development consent was granted, total CO₂ emissions attributable to Gatwick in 2038 are forecast to be 2.465 million tonnes (Mt) per annum higher than in 2018 (7.575 Mt in 2038 vs 5.11 Mt in 2018). This represents an increase in the airport's CO₂ emissions of nearly 50%. Emissions attributable to Gatwick would grow from less than 1% of total UK emissions in 2018 to over 5.5% of the Climate Change Committee's recommended total UK emissions in 2038.

An increase in emissions of this magnitude would plainly be so significant that it would have a material impact on the UK's ability to meet its carbon reduction targets. It would therefore be inconsistent with the Airports National Policy Statement.

As evidence of this, in the Development Consent Order process for Manston Airport the Examining Authority concluded that the proposed development's CO₂ emissions of 0.73 Mt per annum would have a material impact on the ability of Government to meet its carbon reduction targets including carbon budgets. At that time the government's aviation carbon target for 2050 was 37.5 Mt, of which the proposed Manston development represented 1.9%. Gatwick's emissions in 2050 are forecast by the airport to be 7.512 Mt (before efficiencies or 'sustainable' fuels uptake), an increase on 2.4 Mt over the level in 2018. In its recent Net Zero consultation the government proposed that aviation's annual CO₂ emissions allowance for 2050 should be reduced to 21 Mt. Gatwick's full emissions in that year amount to over 35% of that total, with the increase in Gatwick's emissions alone accounting for 11.4%.

More broadly, any increase in Gatwick's emissions would be inconsistent with the Government's principal objective in this respect, which is "to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions" and with the Transport Decarbonisation Plan commitment to achieving net zero aviation by 2050.

The consultation asserts that a combination of aircraft/airspace technology and efficiency, 'sustainable' aviation fuels (SAF), electric or hydrogen (or hybrid) aircraft and offsets may provide a route to net zero for the airport and the wider aviation industry. However, it fails to offer detailed plans and implicitly acknowledges that there are presently no proven measures by which Gatwick's emissions could be significantly mitigated and that the trajectory of the aviation industry to net zero emissions is therefore unclear. The industry admits that electric and hydrogen aircraft will not make a significant impact for at least two decades. SAF are highly unlikely to be produced in large amounts without other negative environmental impacts; fuels made from 'surplus' renewable electricity will also be in very short supply. SAF is in any event likely to be very expensive, raising the cost of plane tickets and reducing demand. Offsets are widely acknowledged to be ineffective and misleading.

Given the Transport Decarbonisation Plan commits to achieving net zero aviation by 2050, Gatwick must set out the measures that it and the wider industry will take to achieve net zero in relation to all emissions attributable to the airport (including Scope 3 emissions, such as emissions from flights and surface access). It must set out the projected effect of those measures, their timing and the resulting emissions trajectory. It must provide evidence that the measures are achievable and would have the impacts claimed, bearing in mind that less than 2% of emissions attributable to the airport are within its direct control. It should propose a firm emissions reduction trajectory together with enforceable monitoring arrangements. Any failure to meet an agreed emissions trajectory should constitute a breach of planning consent, if it is granted, and trigger enforcement action including a reduction in permitted traffic.

Gatwick must also quantify the non-CO₂ and radiative forcing effects (e.g. from contrails) of its proposed growth, based on government guidance and best available scientific evidence, which it currently fails to do. Recent guidance from

the Department for Business, Energy & Industrial Strategy (BEIS) requires the indirect effects of aviation's non-CO₂ emissions to be reported and recommends using a multiplier of 1.9 of the CO₂ component.

Gatwick should set out the measures the airport and the wider industry will take to eliminate non-CO₂ and radiative forcing effects, the expected impacts of those measures, their timing and the resulting trajectory of non-CO₂ impacts. It must provide evidence that the measures are achievable and would have the impacts claimed. It should propose a firm reduction trajectory together with enforceable monitoring arrangements. Any failure to meet an agreed trajectory should constitute a breach of planning consent, if it is granted, and trigger enforcement action including a reduction in permitted traffic

In addition to the above actions, Gatwick must, as required by government policy, monetise and report the increase in emissions caused by the project using the revised approach to valuing greenhouse gas emissions in policy appraisal published by BEIS on 2 September 2021.

It must also monetise the non-CO₂ effects of the project and the impacts it would have overseas (i.e. including arriving flights, which Gatwick has currently excluded from its analysis) in line with guidance on the Valuation of Energy Use and Greenhouse Gas published by BEIS in July 2021.

Any growth at Gatwick should be conditional on it achieving a progressive, material reduction in the emissions and total climate impacts attributable to the airport from a 2019 baseline. A reduction trajectory should be set, independently monitored and enforced.

13. Managing and mitigating effects: noise envelope

Q. We are proposing to introduce a 'noise envelope' to set limits on noise from future operations at Gatwick. The noise envelope would come into effect at the start of a dual runway operation, giving residents certainty that the noise limits it prescribes would not be exceeded. This envelope would then be tightened in the future, giving residents further certainty that air noise levels would have to be lower than they were in 2019 for the full capacity of the Northern Runway Project to be realised.

Do you think the proposed noise envelope is:

Answer: *inappropriate*

Please explain your views.

Gatwick's analysis of the noise impacts of its proposed expansion, and its noise envelope proposals, are deliberately and cynically misleading. Its claim that there would be less impact from aircraft noise following the expansion than was experienced in 2019 is dishonest.

The concept of a Gatwick noise envelope is welcome, but the airport's proposals are inconsistent with CAA guidance and government policy and are unacceptable in numerous respects. They propose an inappropriate metric and inappropriate limits, do not comply with government policy, and lack adequate enforcement arrangements. They have also been put forward without the stakeholder discussion required by the CAA, in contrast to the approach taken by other airports.

In relation to metrics, Gatwick has suggested the noise envelope should rely exclusively on Leq data (i.e. using a measure of average noise in defined periods). It is well aware that the Leq metric does not adequately reflect the impact of aviation noise on communities, because it fails to take account of the increased frequency of overflight that communities would suffer if Gatwick was permitted to expand.

The per-flight noise reductions Gatwick is projecting from the use of more modern aircraft are modest, generally less than 3 dB for arriving aircraft. Noise changes at this level are not usually discernable to humans. Gatwick is, however, well aware from recent changes in flight paths that even small changes in the frequency of noise events is highly noticeable to all communities under those paths or near the airport. A 35% increase in overall flight numbers would have profound adverse impacts on all relevant communities. By proposing sole use of the Leq metric, Gatwick is seeking to trade these two impacts off against each other in a way that is not honest, acceptable or consistent with government policy.

In our view no single measure will adequately capture the impact of Gatwick's proposals or provide protection for residents. An acceptable noise envelope must therefore incorporate a number of measures including passenger and ATM caps, average noise contours at different dB levels (both higher and lower than proposed by Gatwick), noise event frequency at different dB levels and overflight. CAA paper CAP 1129 says "An envelope is likely to be defined by a combination of parameters".

More broadly, Gatwick's proposals do not comply with government aircraft noise policy. Policy requires the industry to reduce and mitigate noise as airport capacity grows. Noise must therefore fall from the projected level in 2029, prior to the commencement of dual runway operations, or the actual level at that time if that is lower. However, Gatwick is proposing that the average noise (Leq) contour in the day period (which is an inadequate measure for the reasons above) would increase as a result of the proposed growth (rather than reduce from that date as policy requires), and that it would be permitted to be significantly greater than noise levels in 2019.

Government policy also requires the benefits of future growth in aviation to be shared between the aviation industry and local communities. Gatwick is proposing that its capacity should grow by over 70% in passenger terms from 2019 and that there would be 35% more commercial aircraft movements. Benefits to the industry would be very substantial. By contrast, the airport's noise impacts, if measured in a meaningful way, would initially increase substantially as utilisation increased before potentially declining modestly from new record levels. Any benefits for communities would be slight and substantially deferred as compared to industry benefits. The airport has therefore made no attempt to share benefits

in the way government policy requires. Its proposals are not compliant with government policy and must be materially revised.

In addition:

- ! Gatwick's proposed metric takes no account of the very significant number of people living outside the proposed 51dB contour who are already adversely impacted by Gatwick aircraft noise. A wider range of metrics must be used that covers all such areas. We do not accept that 51dB represents a limit below which day period noise impacts can be disregarded. Its use is based on one social survey which failed to explore annoyance below 51dB and so failed to find any, and it fails to take into account other peer-reviewed health research and the latest World Health Organisation recommendations. There is extensive evidence that it is not an appropriate lowest observable adverse effect level (LOAEL) in relation to Gatwick.*
- ! Gatwick has ignored the World Health Organisation's Environmental Noise Guidelines for the European Region which strongly recommend reducing noise levels produced by aircraft during the day below 45 dB Lden., and during night time below 40 dB Lnight as aircraft noise above these levels is associated with adverse health effects and effects on sleep. Any noise envelope should require Gatwick to achieve these levels within a defined short-medium term period.*
- ! The metrics Gatwick has proposed would put no pressure on it to encourage a faster take-up of quieter aircraft. Its use of the slower fleet transition data for the noise envelope would impose all risk of slow fleet changes on communities and none on Gatwick or its airline customers. That is inappropriate.*
- ! Gatwick states: "Where an operating restriction is proposed, the Regulations require a noise assessment and consultation with relevant stakeholders who may be affected by it." In addition the CAA states "it is essential full agreement is achieved between all stakeholders on the envelope's criteria, limit values and means of implementation and enforcement". Gatwick's approach to noise envelope development fails to meet these requirements. It is seeking to impose its preferred outcome rather than collaborating with stakeholders to develop an approach that might be mutually acceptable. Relevant stakeholders, including Gatwick's own Noise Management Board, have not been consulted on the noise envelope proposal. In contrast, other airports have adopted an inclusive and collaborative approach by setting up dedicated design groups, including community groups and local authority representatives, to facilitate noise envelope development.*
- ! Regulation 598/2014 states "the competent authorities shall follow up and monitor the implementation of the operating restrictions and take action as appropriate". Gatwick's proposal that it should carry out monitoring and reporting itself is contrary to the regulations and not acceptable.*
- ! Gatwick's noise envelope proposal makes no mention of what should happen in respect of enforcement if a breach occurs, and fails to confirm which body will be responsible for taking any remedial action. It is critical that the noise envelope process, including how breaches are captured, reported and remediated must be fully independent and clearly documented. Gatwick's proposals do not achieve either requirement.*

- ! *Gatwick's proposals fail to set out the process by which the noise envelope would be reviewed and adjusted if a significant change occurred. Given that the FASI(S) airspace change project may make changes to the airspace around the airport, it is critical that a defined process is in place so that the noise envelope can be reviewed and adjusted to ensure it continues to provide the certainty that communities require.*

In summary Gatwick's noise envelope proposals are wholly unacceptable and require substantial revision. At a minimum any noise envelope should contain absolute passenger and ATM caps, limits on the frequency of noise events above specific sound levels using N above metrics, and Leq limits. In each case the limits should be set at levels that achieve a genuine sharing of benefits as required by government policy. A noise envelope development group, including all stakeholders, should be set up to develop alternative proposals.

In addition to the noise measures proposed in the PEIR, any expansion at Gatwick should be conditional on a ban on all night flights for a full eight-hour period every night.

More broadly, Gatwick's assessment of the health effects of aircraft noise are inadequate and based on insufficient evidence. This needs to be addressed.

14. Managing and mitigating effects: noise mitigation

Q. In addition to the Noise Envelope, we are proposing other measures to mitigate the noise effects associated with the Northern Runway Project, including an enhanced Noise Insulation Scheme, the noise envelope, a new noise barrier at the western end of the Northern Runway, and noise barriers to support changes to the highway network. What are your views on our approach to noise mitigation? Please specify the measures to which your comments refer.

The noise mitigation measures Gatwick has proposed are inadequate. The airport should be required to compensate all residents local to the airport to at least the extent offered in the course of the Airports Commission's work in 2014. It should also be required to compensate all residents living under flight paths for loss of property value.

15. Consultation process

For this consultation we have made details of our proposals available in a number of ways, including in hard copy documents, on our project website, in a virtual exhibition and by providing opportunities to speak to members of the team. We welcome your feedback on how you have found the consultation process. Please let us know if you have any comments about the consultation process.

In our view the consultation is not fit for purpose.

Amongst other things:

- ! *The air traffic projections in the consultation give an erroneous and misleading impression of the need for the development and are not consistent*

with the Airports National Policy Statement. The ANPS requires airports, other than Heathrow, that are seeking to expand to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow. Gatwick's failure to provide an appropriate and policy compliant assessment of the need for the development means that respondents have not been able to evaluate its proposals adequately.

- ! The economic analysis in the consultation contains material errors and omissions, as set out in our answer to questions 2 and 3 above. As a result the consultation gives an erroneous and misleading impression of the benefits and costs of the proposed development.*
- ! The consultation overview document makes unsupportable claims about the employment benefits of the proposed development.*
- ! The consultation mischaracterises the noise impacts of the proposed development, makes unsupportable assertions on noise matters and does not provide sufficient information to allow respondents to evaluate noise impacts in specific areas.*

In our view the consultation is therefore not "based on accurate information that gives consultees a clear view of what is proposed ..." as required by the Planning Act 2008 Guidance. It also does not provide sufficient information to allow informed responses and it does not permit the "intelligent consideration" required by the Gunning Principles for consultations.

For these and other reasons we do not believe the consultation meets the requirements of the Planning Act and we consider that any application based on it should be rejected on the grounds of inadequate consultation.

In addition, Gatwick has not engaged with community groups or councils in a positive and proactive manner. Questions posed in engagement meetings have not been answered promptly and not all requested engagement meetings have been arranged. No opportunity for face-to-face meetings has been provided.

The level of support for local councils to have sufficient capacity to properly respond to this consultation (1 month of officer time per local authority) was not adequate. It was unrealistic to expect that one month of officer time, for a consultation of this breadth and extent, would be in any way sufficient.