



GATWICK AREA CONSERVATION CAMPAIGN

Campaign Office: 2 Glovers Gate,
Glovers Road, Charlwood RH6 0EG
Tel 01293 862821
www.gacc.org.uk
info@gacc.org.uk

Robert Courts MP
Parliamentary Under Secretary of State
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

11 December 2020

Dear Minister

BUILDING BACK BETTER AND GREENER AT GATWICK

I am writing in relation to the letter sent to you on 2 December by Tom Crowley, Chairman of the Gatwick Consultative Committee, GATCOM.

The Gatwick Area Conservation Campaign (GACC) is a long-standing member of GATCOM and represents community and environmental groups on it. We support many of the points made in the Chairman's letter. However, we do not believe that it addresses adequately a number of the fundamental issues that will have to be confronted if aviation in general, and Gatwick specifically, is to build back better. We are disappointed that insufficient time was allowed for these points to be fully debated and a consensual position potentially achieved.

The foundations of any initiative to build Gatwick and aviation back better must be clear government policies on the industry's noise and environmental impacts and robust, empowered, regulatory mechanisms to ensure those policies are delivered. Neither exists currently.

In relation to noise, current government policy is opaque. All aviation noise objectives from 2003 have said that the government wants to "*limit and where possible reduce*" aircraft noise, or the effects of aircraft noise. However, we have yet to find a minister, official or regulator who can explain what that means in practical terms. The lack of clear policy has become a licence for inaction and meant that the industry has not been held to account effectively for its noise impacts.

Successive governments have compounded this policy vacuum by failing to put in place robust noise regulatory arrangements. A series of piecemeal changes, over many years, has resulted in a complex, confusing and ineffective position, both nationally and at Gatwick. Many bodies have some role in aviation noise matters, but none has clear responsibility, and the authority, for requiring all possible noise reduction measures to be taken, and for setting and enforcing airport noise targets that fairly balance all stakeholders' interests.

Clear noise policies and independent, expert, empowered regulation of aviation's noise impacts should be a cornerstone of the build back better programme.

In relation to the industry's climate impacts the position is worse. In 2003 the then government said that the aviation industry should take responsibility and reduce its contribution to global warming. It forecast that CO₂ emissions from UK aviation might reach 16-18 million tonnes by 2030. In fact, UK aviation's CO₂ emissions had reached well over 35m tonnes by 2018. In the 2013 Aviation Policy Framework the government said that its objective was to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions. That too has not happened.

For approaching two decades, the aviation industry has treated government emissions policy with contempt. Successive governments have stood by and allowed that to happen. If building aviation back better is to have any credibility, the government must start to take the industry's emissions and other climate impacts seriously. It can no longer sit on the sidelines applauding inadequate and unenforced industry-led road maps, or rely on international organisations knowing they do not have the means to effect change on the scale needed.

Most of the measures now needed are set out in the CCC's Sixth Carbon Budget, published earlier this week. Critically there must be a robust policy and regulatory framework to address the weak consumer, economic and other drivers for change in the industry. Key components of that framework should include effective demand management measures and a prohibition on expansion unless and until the industry is demonstrably outperforming an agreed trajectory to eliminate its emissions and non-carbon impacts.

In relation to Gatwick specifically, building back better must include agreed measures to ensure that all proposed growth is scrutinised and consented in line with your policy. As you are aware from separate correspondence, that is not currently the case. We therefore look to you to put in place arrangements to ensure government policy is complied with.

In any event, Gatwick's size should be consistent with the achievement of CO₂ and other environmental and noise targets. Unless new technologies are deployed on a scale not currently foreseeable, that means that the airport should not be permitted to re-grow to its previous size, let alone to implement its master plan proposals.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter Barclay', with a stylized flourish at the end.

Peter Barclay
Chairman, GACC

CC:

Tom Crowley, Chair, GATCOM
GATCOM members