

GATWICK AIRPORT NORTHERN RUNWAY PROJECT CONSULTATION QUESTIONNAIRE

GACC DRAFT RESPONSES

Suggested summary response

If you do not have time to answer all 15 questions you may want to draw on and adapt the following summary response. Please remember it's always best to use your own words wherever possible

We strongly oppose Gatwick's proposed expansion and any growth at Gatwick.

The airport has failed to demonstrate that there is a need for additional airport capacity that is consistent with government policy as set out in the Airport's National Policy Statement.

The government's climate change advisers have made clear that there is no case for additional airport capacity in the UK and that any net expansion would have unacceptable climate change impacts.

Expansion at Gatwick would increase the airport's CO₂ emissions by nearly 50%. Emissions from Gatwick alone would grow from less than 1% to over 5.5% of total UK emissions. An increase in emissions of this scale would have a material impact on the UK's ability to meet its carbon reduction targets and is therefore inconsistent with government policy. The airport has no credible plans to mitigate these emissions because credible low carbon technologies do not currently exist for commercial aviation. Gatwick has also failed to assess or quantify the non-greenhouse gas effects of its proposed growth, and must do so based on best available scientific evidence. It must also monetise and report its emissions using latest government figures.

Expansion at Gatwick would have devastating consequences for local communities and people under flight paths: there would be more noise, more road and rail congestion, worse air quality and properties under flight paths would be devalued.

Gatwick's analysis of the noise impacts of its proposed expansion is deliberately misleading. Its noise envelope proposals are inconsistent with CAA guidance and unacceptable. They propose inappropriate metrics and limits, do not comply with government policy, lack adequate enforcement arrangements and have been put forward without stakeholder discussion, in contrast to the approach taken by other airports.

The airport's proposals in each of these respects are unacceptable. There should be no expansion at Gatwick.

Responses to individual consultation questions

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

Short response

We strongly oppose Gatwick's proposals. The airport has failed to demonstrate that there is a need for additional airport capacity. The government's climate change advisers have made clear that there is no case for additional airport capacity in the UK and that any net expansion would have unacceptable impacts. Expansion at Gatwick would also have devastating consequences for local communities and people under flight paths: there would be more noise, more road and rail congestion, worse air quality and properties under flight paths would be devalued. The airport's proposals in each of these respects are unacceptable. There should be no expansion at Gatwick.

Longer response

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.

We do not believe Gatwick has made a credible case for the development of its standby runway. Its consultation acknowledges that the airport has substantial surplus passenger and air traffic movement capacity, above its 2018 levels, without development of its standby runway. Our analysis of historic growth rates shows that it has taken Gatwick over 20 years to utilise the surplus passenger capacity that currently exists and over 15 years to utilise existing surplus ATM capacity. Based on reasonable recovery and growth assumptions we estimate that Gatwick will not utilise its existing surplus capacity until the 2040s at the earliest and may never need additional capacity. The Committee on Climate Change has advised that there is no need for additional airport capacity in the UK.

Gatwick's proposals do not comply with government aviation policy. The Airports National Policy Statement requires airports (other than Heathrow) which 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.

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. The consultation acknowledges 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.

Gatwick's expansion would have substantial noise consequences for local communities and are inconsistent with the government's aircraft noise policies. Government policy requires the industry to reduce and mitigate noise as airport capacity grows. However, Gatwick is 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 aircraft movement terms. 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.

Gatwick's noise envelope proposals are 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 contrast to the approach taken by other airports. For these and other reasons they are inappropriate and unacceptable.

The airport should not be permitted to expand unless and until it shows it can do so without adverse environmental and noise impacts. All impacts should be measured from a 2019 baseline so the cumulative effects of growth are properly assessed.

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?

GACC has commissioned advice from the New Economics Foundation, a leading economics consultancy that has extensive experience of airport expansion proposals, on the economic and employment claims in Gatwick's consultation. We will provide a draft answer to this question when we have NEF's advice.

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?

GACC has commissioned advice from the New Economics Foundation, a leading economics consultancy that has extensive experience of airport expansion proposals, on the economic and employment claims in Gatwick's consultation. We will provide a draft answer to this question when we have NEF's advice.

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?

We are engaging with local Councils and environmental groups who are assessing the impacts of Gatwick's proposed construction programme. We will provide a draft answer based on that assessment as soon as possible.

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?

No comment.

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?

We are assessing the travel implications of Gatwick's proposals and will provide a draft answer as soon as possible

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.

We are engaging with local Councils who are assessing the impacts of Gatwick's proposed construction programme. We will provide a draft answer based on that assessment as soon as possible

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.

We are assessing the transport implications of Gatwick's proposals and will provide a draft answer as soon as possible

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?

We are engaging with local Councils who are assessing the impacts of Gatwick's proposed construction programme. We will provide a draft answer based on that assessment as soon as possible

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?

We are engaging with local Councils who are assessing the impacts of Gatwick's construction transport proposals. We will provide a draft answer based on that assessment as soon as possible

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?

Short response

Expansion at Gatwick would increase the airport's CO₂ emissions by nearly 50%. Emissions from Gatwick alone would grow from less than 1% to over 5.5% of total UK emissions. An increase in emissions of this scale would have a material impact on the UK's ability to meet its carbon reduction targets and is therefore

inconsistent with government policy. The airport has no credible plans to mitigate these emissions because credible low carbon technologies do not currently exist for commercial aviation. Gatwick has also failed to assess or quantify the non-greenhouse gas effects of its proposed growth, and must do so based on best available scientific evidence. It must also monetise and report its emissions using latest government figures.

Longer response

If the project proceeds, Gatwick's total CO₂ emissions in 2038 are forecast to be 2.465 million tonnes per annum higher than in 2018 (7.575m tonnes in 2038 vs 5.11m tonnes in 2018). This represents an increase in the airport's CO₂ emissions of nearly 50%. An increase in emissions of this (or any) magnitude 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".

Gatwick's emissions 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 scale 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.

The consultation asserts that a combination of aircraft/airspace technology and efficiency, "sustainable" aviation fuels, electric or hydrogen (or hybrid) aircraft and offsets will provide a route to Net Zero for the airport and the wider aviation industry. However, it acknowledges 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 therefore unclear.

Gatwick's Action Plan must set out the measures the airport will take to achieve Net Zero emissions, the 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. It should propose a firm emissions reduction trajectory together with enforceable monitoring arrangements. Any failure to meet the emissions trajectory should constitute a breach of planning consent, if it is granted, and trigger enforcement action including a reduction in permitted traffic.

The Action Plan must also quantify the non-greenhouse gas and radiative forcing effects (e.g. from contrails) of Gatwick's growth, based on best available scientific evidence. It should set out the measures the airport and the wider industry will take to eliminate these effects, the expected impacts of those measures, their timing and the resulting trajectory of non-greenhouse gas 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 the 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 the Department for Business, Energy & Industrial Strategy (BEIS) on 2nd 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.

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.

Short response

Gatwick's analysis of the noise impacts of its proposed expansion is deliberately misleading. Its noise envelope proposals are inconsistent with CAA guidance and unacceptable. They propose inappropriate metrics and limits, do not comply with government policy, lack adequate enforcement arrangements and have been put forward without stakeholder discussion, in contrast to the approach taken by other airports.

Longer response

Gatwick's analysis of the noise impacts of its proposed expansion is deliberately 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 unacceptable. They propose inappropriate metrics and limits, do not comply with government policy, lack adequate enforcement arrangements and have been put forward without stakeholder discussion, in contrast to the approach taken by other airports.

In relation to metrics, Gatwick has suggested the noise envelope should rely exclusively on Leq 16 hour day 51dB data. It is well aware that this metric does not adequately reflect the impact of aviation noise on communities, because it fails to

take account of the increased frequency of overflight which communities will suffer as a direct result of Gatwick's expansion plans. 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 average noise, noise event frequency and overflight. In support of this, 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 when dual runway operations would commence. However, Gatwick is proposing that the average noise 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 and that there would be 35% more 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 before potentially declining modestly from new record levels. There would be no benefits for communities. The airport has therefore made no attempt to share benefits in the way government policy requires.

In addition:

- 1. Gatwick's proposed metric takes no account of the very significant number of people living outside the proposed 51dB contour, but who are already adversely impacted by Gatwick aircraft noise.*
- 2. 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 approach by setting up dedicated design groups, including community groups and local authority representatives, to facilitate a collaborative and consensual approach to noise envelope development.*
- 3. 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, contrary to the regulations, is not acceptable.

- 4. Gatwick's noise envelope proposal makes no mention of what should happen in respect of enforcement if a breach occurs, and doesn't confirm which body will be responsible for taking any remedial action. It's critical that, if impacted communities are to have real certainty, the noise envelope process, including how breaches are captured, reported and remediated must be clearly documented. Gatwick's proposals fail to do so.*
- 5. 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 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 wish for.*

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.

We are currently seeking external advice on the proposed noise mitigation measures in the consultation and will provide a draft answer to this question when we have that advice.

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.

No comment.