

## **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 Airports 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.*

*The employment benefits Gatwick claims the project would deliver are misleading. Its own consultant, Oxera, says 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.*

*Gatwick's assessment of the economic benefits and costs of the proposed project is based on unsupportable or out of date assumptions, together with omissions and errors.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.*

*Expansion and growth at Gatwick would increase the airport's CO<sub>2</sub> emissions by nearly 50% from 2018. Emissions attributable to Gatwick alone would grow from less than 1% in 2019 to over 5.5% of total UK emissions by 2038. An increase in emissions of this (or any) 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 viable low carbon technologies do not currently exist for commercial aviation. Gatwick has also failed to assess or quantify the non-CO<sub>2</sub> 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 carbon value figures. Any growth at Gatwick should be conditional on it achieving a progressive, material reduction in the total climate impacts facilitated by the airport from a 2019 baseline. A reduction trajectory should be set, independently monitored and enforced.*

*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 and cynically misleading. Its noise envelope proposals are inconsistent with CAA guidance and unacceptable. They propose inappropriate metrics and 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.*

*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 or that the project would have net employment or economic benefits. 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 impacts. The airport's CO<sub>2</sub> emissions would increase nearly 50% from 2018 levels and reach 5.5% of total UK emissions; both clearly incompatible with government policy. Expansion at Gatwick would also have other 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.*

*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 utilise the surplus passenger capacity that currently exists and over 15 years to utilise existing surplus ATM capacity. 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 around 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.*

*Gatwick's proposals do 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.*

*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, shows 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.*

*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.*

*Gatwick's proposals would increase the airport's CO<sub>2</sub> 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 CO<sub>2</sub> increases and other climate impacts on this scale to facilitate an increase in leisure travel, 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-CO<sub>2</sub> 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 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 commercial 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. 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 contrast to CAA guidance and the approach taken by other airports. For these and other reasons they are unacceptable and require substantial revision. A noise envelope development group, including all stakeholders groups, should be set up to develop alternative proposals.*

*The airport should not be permitted to grow or 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 fully assessed.

If consent is granted for the proposed development 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 legally binding commitment that there would be no further runway or associated development at Gatwick including of a full new runway.
3. A requirement progressively to reduce the absolute number of passengers 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?

### **Short response**

*Gatwick's presentation of the asserted employment benefits of the proposed development is misleading. The airport's own consultant, Oxera, acknowledges that the project is not expected to result in material net job creation at the national level, but this is not acknowledged in Gatwick's consultation summary or overview. Jobs that might be created in the local region would very largely be displaced from other parts of the economy and other regions. This is likely to be inconsistent with the government's levelling up agenda. Gatwick's local employment estimates are in any event based on dated studies and do not reflect more recent evidence. They are therefore subject to significant uncertainty and cannot be relied upon.*

### **Longer response**

*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 currently supportable.*

*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.*

*In relation to local and regional employment, the 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. 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.*

### **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?*

#### **Short response**

*Gatwick's assessment of the economic benefits and costs of the proposed development is based on unsupportable assumptions, omissions and errors. Amongst other things it assumes that the Covid-19 pandemic will have no long-term impact on passenger demand at Gatwick and that there will be a substantial increase in business passengers using the airport (who generate the majority of asserted economic benefits). These assumptions are inconsistent with historic experience and market expectations respectively. Gatwick has failed to assess the adverse economic impacts the proposed expansion would be likely to generate by increasing outbound tourism, including negative impacts for the UK's tourism economy and balance of trade. In addition Gatwick's estimate of the monetised value of the greenhouse gas emissions resulting from the project is incorrect and uses out-of-date input values. Correction of the above unsupportable 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.*

#### **Longer response**

*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 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 represented 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 up to date values and actual emissions forecasts for every year for which they are available rather linear interpolation between years.*

- ! International emissions (i.e. inbound flights) and non-CO<sub>2</sub> emissions from aviation have been omitted in apparent contradiction of government guidance. The value of non-CO<sub>2</sub> 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 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 such a positive impact.*

*The development will increase air pollution and noise impacts on sensitive habitats around the airport. In addition, the land take required for bio fuels for future flights will also have impacts on biodiversity and ecology that would be attributable to Gatwick's expansion plans. This is unacceptable.*

## **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 for Heathrow.*

*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 posed by Gatwick on those living downstream near the river Mole. Any rainfall event with greater flood intensity that 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.*

## **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?*

### **Short Response**

*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. 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 accessing the airport by car in 2047 almost 40% higher than in 2019.*

*Gatwick's proposals are inadequate and unacceptable. There should be no increase in the number of passengers accessing the airport by road. Instead the airport should be required progressively to reduce the absolute number of passengers accessing the airport by road as a condition of any expansion. A reduction trajectory should be set, monitored and enforced.*

### **Longer Response**

*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. 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 accessing the airport by car in 2047 almost 40% higher than in 2019. To accommodate this increase in road traffic movements the airport is proposing provision of over 25,000 additional car parking spaces and substantial highway capacity enhancements. In addition increased vehicle movements are predicted for the proposed doubling of freight cargo 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 was heavily advertised 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 by 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 expectation of 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 of the mode share change. 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 this use of this enhanced capacity by other users of this rail corridor, switching from road to rail transport but not travelling to and from the airport is not considered.*

*Gatwick must model the public transport investment required to service all of the increased journeys to and from the airport by passengers and airport workers. This 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.*

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

*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 impact only a small segment of people travelling to and from the airport 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 be required progressively to reduce the absolute number of passengers 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 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 is these modes, not increased road capacity, that must then be invested in. This would remove the need for the works*

*proposed on these roundabouts, remove the need for the additional parking proposed, and instead 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.

### **Short Response**

*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 to the airport, with total passengers arriving by car in 2047 almost 40% higher than in 2019. This is completely at odds with the government's and local Council's plans to decarbonise transport. These require net reductions in car travel and a shift to public and active travel instead.*

*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.*

*Local congestion is a matter of significant concern in local communities. GAL report that even with the highway capacity improvements it is proposing there would still be localised congestion which they refer to as 'manageable'. For the communities affected, particularly at peak times, the impacts of additional road traffic such as local air pollution hot spots are neither 'manageable' nor acceptable.*

### **Longer response**

*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*

*to the airport, with total passengers arriving by car in 2047 almost 40% higher than in 2019. The level of investment proposed in road transport and the insufficient proposed increase in public transport is completely at odds with the government's and local Council's plans to decarbonise transport. These require net reduction in car travel and a shift to public and active travel instead. New routes as well as increased travel on existing public transport 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.*

*We comment below on the airport's proposals.*

### **Road**

*As 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 almost 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 decrease delays, it does nothing to reduce commuting by road. In relation to road connections between the airport and other economic centres, 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 which 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 with the Gatwick expansion, 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 with 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, 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 this use of this enhanced capacity by other users of this rail corridor, switching from road to rail transport but not travelling to and from the airport is not considered.*

### **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 there will still be localised congestion which they refer to as 'manageable'. A range of sensitivity tests should be carried out which assume higher levels of car traffic, which could emerge from a lower than predicted shift to public transport and higher background growth.*

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

### **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.*

*In addition, the anticipated increase in other traffic required to service the operations and maintenance of the airport should be within 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.*

## **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 Crawley, Reigate and Banstead. The reliance on Smart Motorways on the main strategic transport routes to the airport increases this risk. The Transport Select Committee has recommended that these are paused, so this highway capacity must not be assumed by GAL.*

## **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 transport impacts of the proposed construction works 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 24/7 on unsuitable local road networks 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 work force is such that own transport will be their priority. Thus there is a significant unknown impact to be 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?*

### ***Short response***

*The growth Gatwick is proposing would increase CO<sub>2</sub> emissions attributable to the airport by nearly 50%. Its emissions would grow from less than 1% of total UK emissions in 2018 to over 5.5% in 2038. An increase in emissions of this (or any) scale would plainly have a material impact on the UK's ability to meet its carbon reduction targets and is therefore inconsistent with the Airports National Policy Statement.*

*The airport has been unable to put forward credible plans for mitigating its projected emissions because there are currently no proven technologies for reducing commercial aviation CO<sub>2</sub> emissions at scale. Its expansion proposals are therefore inconsistent with government's policy requirement that the aviation sector must "make a significant and cost-effective contribution towards reducing global emissions" and with the Transport Decarbonisation Plan commitment to achieving net zero aviation by 2050.*

*Gatwick has also failed to assess or quantify the non-CO<sub>2</sub> climate impacts of its proposed growth. It must do so based on best available scientific evidence. Government guidance requires the indirect effects of aviation's non-CO<sub>2</sub> emissions to be quantified using a multiplier of 1.9 times the CO<sub>2</sub> component. Gatwick must also monetise and report its emissions using latest government carbon values.*

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

### ***Longer response***

*If development consent was granted, total CO<sub>2</sub> emissions attributable to Gatwick 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 CO<sub>2</sub> 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 (ANPS).*

*As evidence of this, in the Development Consent Order process for Manston Airport the Examining Authority concluded that the proposed development's CO<sub>2</sub> emissions of 0.73 million tonnes (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 CO<sub>2</sub> emissions allowance for 2050 should be reduced to 21 Mt. Just the increase in Gatwick's emissions therefore amounts to 11.4% of the government's proposed 2050 allowance for aviation emissions. Gatwick's full emissions in that year amount to over 35% of the government's proposed 2050 allowance*

*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 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. The industry admits that electric and hydrogen aircraft will not make a significant impact for at least two decades. SAF is 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 will also be very expensive, raising the cost of plane tickets, 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 surface access and aircraft emissions). 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-CO<sub>2</sub> and radiative forcing effects (e.g. from contrails) of Gatwick's growth, based on government guidance and best available scientific evidence, which the PEIR fails to do. Recent guidance from the Department for Business, Energy & Industrial Strategy (BEIS) requires the indirect effects of aviation's non-CO<sub>2</sub> emissions to be reported and recommends using a multiplier of 1.9 of the CO<sub>2</sub> component.*

*Gatwick should set out the measures the airport and the wider industry will take to eliminate non-CO<sub>2</sub> and radiative forcing effects, the expected impacts of those measures, their timing and the resulting trajectory of non-CO<sub>2</sub> 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-CO<sub>2</sub> 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 total climate impacts facilitated by 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.

**Short response**

*Gatwick's analysis of the noise impacts of its proposed expansion is deliberately and cynically misleading. Its noise envelope proposals are inconsistent with CAA guidance and unacceptable. They propose an inappropriate metric and 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. For these reasons they are wholly unacceptable and require substantial revision. A noise envelope development group, including all stakeholders groups, 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.*

**Longer response**

*Gatwick's analysis of the noise impacts of its proposed expansion is 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 unacceptable. They propose an inappropriate metric and 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 period). 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 which communities would suffer if Gatwick was permitted to expand. 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 contours at different dB levels (both higher and lower), noise event frequency at different dB levels 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, 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 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. Its proposals are therefore not compliant with policy and must be materially revised.

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. A wider range of metrics must be used that covers all such areas. We do not accept that 51dB represents the 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 so subsequently failed to find any, it fails to take into account the peer-reviewed health research and the summary prepared by the World Health Organisation.
2. 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.
3. This metrics Gatwick has proposed would put no pressure on it to encourage a faster take up of quieter aircraft.
4. 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.

5. *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.*
6. *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, if impacted communities are to have real certainty, 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.*
7. *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 require.*

*In summary Gatwick’s noise envelope proposals are wholly unacceptable and require substantial revision. A noise envelope development group, including all stakeholders groups, 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 noise are inadequate and based on inadequate 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.

*Gatwick has not engaged with community groups or councils in a positive and proactive manner. Answers to questions posed in engagement meetings have not been provided.*