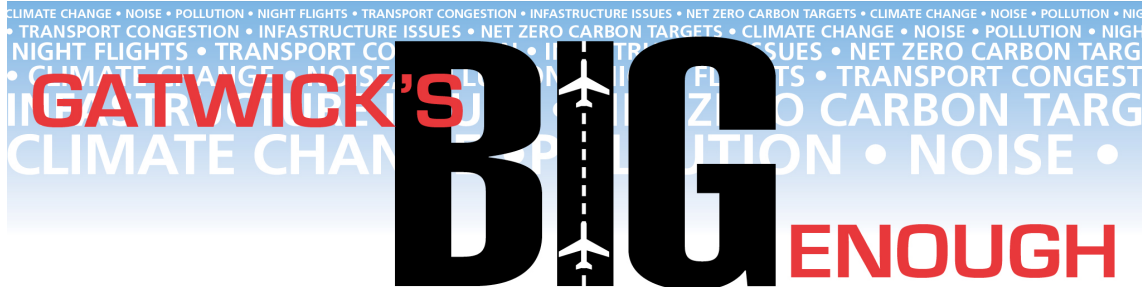


GACC NEWSLETTER

Number 127

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Say NO to further expansion of Gatwick Airport – www.gacc.org.uk

Dear Members & Friends,

Our last newsletter flagged that Gatwick was shortly expected to launch its consultation on proposals to expand by developing and then making routine use of its standby runway.

That duly happened on 9 September when the airport published several thousand pages of consultation documents and invited the public to respond. The consultation is open for 12 weeks, until 1 December. The consultation documents are here: <https://www.gatwickairport.com/business-community/future-plans/northern-runway/documents/>.

Since then we've been analysing the main documents and beginning to prepare a response. That work continues. We'll circulate a full draft response in due course but wanted to highlight a number of key points from the consultation and our own analysis at this early stage.

The key proposals

Gatwick is proposing to grow from 45.7 million passengers per annum (mppa) in 2018 to 75.6 mppa by 2038 and from 280,790 aircraft movements annually to 382,000 movements over the same period.

That's growth of over 65% in passenger numbers and over 35% in flight numbers. Passenger numbers are forecast to grow more than flights because there would be more passengers per flight through using larger aircraft and securing higher load factors.

Of the growth in flight numbers about one third is enabled by the airport making more intensive use of its existing main runway and the other two thirds from developing the current standby runway so it could be used at the same time as the main runway.

Flight paths would remain unchanged so the burden of increased noise would fall entirely on those who suffer it now.

Gatwick's plan is to undertake the core airfield works to the standby runway and taxiways over approximately five years from 2024 to 2029, with further works continuing at a lower intensity over the period to 2038. In addition to airfield works, the project would involve extensions to the north and south terminal buildings, the provision of three additional hotels, a 54% increase in car parking spaces, from 46,700 to 71,951, and works to the road network serving Gatwick.

Gatwick plans to submit its planning application in late 2022 and the planning process itself would take place in 2023.

Our initial views

Our work so far has focused on three key aspects of the proposals: their climate change and noise

impacts and the justification (or need) for expansion. Our initial views are below.

Topic	Summary of proposals and key impacts	GACC views
CO ₂ emissions and other climate impacts	<p>Gatwick’s 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).</p> <p>This represents an increase in CO₂ emissions of nearly 50%.</p>	<p>An increase in emissions of this (or any) magnitude would be inconsistent with the Government’s objective <i>“to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions”</i>. Gatwick needs to explain how expanding one of the hardest to decarbonise sectors of the economy is consistent with the government’s net zero legal commitment for 2050 and the international commitment to staying within the 1.5! C global warming limit.</p>
	<p>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.</p>	<p>The increase in carbon emissions would 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.</p>
	<p>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. It asserts, however, that a combination of aircraft/airspace technology and efficiency, “sustainable” aviation fuels and electric or hydrogen (or hybrid) aircraft</p>	<p>Seeking to justify Gatwick’s growth on the basis of unsupported assertions on the impact of future technologies is reckless and irresponsible.</p>

	<p>and offsets will provide a route to Net Zero for the industry.</p>	
	<p>The consultation claims to adopt a worse case assessment of climate impacts but fails to quantify the non-greenhouse gas and radiative forcing effects (e.g. from contrails) of Gatwick's growth, although the government's own greenhouse gas emissions reporting (used by GAL to assess everything else) includes these. The current scientific consensus is that these are far greater than the CO₂ impacts.</p>	<p>The non-CO₂ impacts of Gatwick's proposed growth must be quantified and assessed.</p>
<p>Noise</p>	<p>Gatwick's noise contours would increase compared to the "do nothing" option across all time periods. The airport claims that average noise contours would be likely to fall compared to 2019 levels but this relies on uncertain fleet replacement assumptions.</p>	<p>The noise impacts of Gatwick's proposed growth are inconsistent with government policy. They do not share the benefits of growth between the aviation industry and local communities or ensure that noise is reduced and mitigated as capacity grows. Instead the benefits of growth would accrue wholly to the airport and the wider aviation industry through greater capacity. Communities would suffer substantially increased noise impacts.</p>
	<p>Gatwick focuses on average noise metrics that do not properly represent the impact of aircraft noise on people. By using average noise contours it seeks to claim that minor reductions in noise per aircraft</p>	<p>The airport's focus on average noise contours is misleading. It should focus on noise event frequency at all levels of noise that affect people.</p>

	(which would generally be inaudible to humans) would outweigh a 35% increase in flight numbers.	
	The airport is proposing a “noise envelope” which would limit its 51dB noise contour to 146.7km ² in 2032 and 125.7km ² by 2038. The 51dB noise contour covered 136 km ² in 2019.	The proposed noise envelope uses inappropriate metrics and is wholly one-sided.
	There are no proposals to limit or manage noise outside the 51dB contour.	
Need	The consultation acknowledges that Gatwick currently has over 35% available passenger capacity above its 2018 levels (and over 15% available aircraft movement capacity) without development of its standby runway.	Based on historic and plausible future growth rates there is no need for Gatwick to seek new capacity. 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 capacity until the 2040s. This excludes any allowance for traffic transferring to Heathrow if a third runway is constructed and any future financial or other market disruption.
	Gatwick’s forecasts assume that Heathrow’s third runway project does not go ahead.	Gatwick’s proposals do not comply with government policy. It is required to demonstrate there is a need for additional capacity at Gatwick that is additional

		to or different from the need which would be met by the provision of a third runway at Heathrow, but has not done so.
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In summary, Gatwick's proposals are incompatible with government policy in key respects and would be devastating for local communities, people under flight paths and the environment. They would mean more noise, more CO₂ and other emissions more congestion and worse air quality. Local infrastructure would be unable to cope and properties under flight paths would be devalued.

We will continue to analyse and seek advice on Gatwick's proposals including reviewing the transport congestion, air quality and economic benefits sections of the consultation.

We plan to circulate initial draft answers to the consultation questions by the end of September, and then refine these over the remaining period of the consultation.

We encourage all our members and everyone concerned about Gatwick's adverse impacts to respond to the consultation. Although the planning process itself will not start until late 2022 this is the main opportunity for the public to have a direct say on Gatwick's plans.

If you are organising any form of group or public meeting and need a speaker to help with informing everyone about these proposals don't hesitate to contact us and we'll provide one.

[Joining GACC: please spread the word](#)

Please encourage your friends, family and neighbours to join GACC and help protect the interests of communities around the airport and under flight paths. Information on how to join is on our website here: <http://www.gacc.org.uk/contact-us.php>.

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