

GATWICK AIRPORT NORTHERN RUNWAY PROJECT CONSULTATION QUESTIONNAIRE

GACC CONSULTATION RESPONSE MEDIUM VERSION, NOVEMBER 2021

1. Northern Runway proposals: overall

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

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

Answer: *Strongly oppose*

Please explain your views

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.

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

The 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 CO₂ emissions attributable to the airport would increase nearly 50% from 2018 levels and reach 5.5% of total UK emissions; both clearly incompatible with government policy. It would be wholly unacceptable to allow CO₂ increases and other climate impacts on this scale to facilitate an increase in leisure travel, predominantly for the benefit of frequent flyers.

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.

2. Economic benefits: jobs and skills

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

Gatwick's presentation of the 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.

3. Economic benefits: business and the economy

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

Gatwick's assessment of the economic benefits and costs of the proposed development is based on unsupportable assumptions, omissions and errors.

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. Gatwick's estimate of the monetised value of the greenhouse gas emissions resulting from the project is substantially incorrect because it 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.

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 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.

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?

Gatwick's proposals are inadequate and unacceptable. 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 over 40% higher than in 2019.

There should be no increase in the number of passengers accessing the airport by road. Instead the airport should ensure provision of sufficient public transport capacity to accommodate all the additional demand and be required progressively to reduce the absolute number of passengers accessing the airport by road 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 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.

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 over 40% higher than in 2019. This is completely inconsistent 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.

10. Construction: managing impacts

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

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

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?

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

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?

The growth Gatwick is proposing would increase CO₂ 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. It would be wholly unacceptable to allow CO₂ increases and other climate impacts on this scale to facilitate an increase in leisure travel, predominantly for the benefit of frequent flyers.

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 CO₂ 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-CO₂ 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-CO₂ emissions to be quantified using a multiplier of 1.9 times the CO₂ 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 and material reduction in the total climate impacts attributable to the airport (inclusive of all surface transport and flight impacts) 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 and agreement on a noise envelope, any expansion at Gatwick should be conditional on a ban on all night flights for a full eight-hour period every night.

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.

The consultation is not fit for purpose.

Amongst other things it gives an erroneous and misleading impression of the need for the development, uses projections that are not consistent with the Airports National Policy Statement, contains material errors and omissions in its economic analysis (and so gives a misleading impression of the benefits and costs of the proposed development) and mischaracterises the noise impacts of the proposed development.

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