

GATWICK AIRPORT NORTHERN RUNWAY PROJECT CONSULTATION QUESTIONNAIRE

GACC CONSULTATION SHORT RESPONSE, NOVEMBER 2021

If you do not have time to answer all 15 questions in the questionnaire 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.

Need

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.

Employment and economic factors

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Gatwick's assessment of the economic benefits and costs of the proposed project is based on unsupportable or out of date assumptions, together with omissions and errors.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

Climate impacts

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

Expansion and growth at Gatwick would increase the airport's CO₂ 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-CO₂ 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.

Community and noise impacts

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.

Conclusion

The airport's proposals in each of these respects and others are unacceptable. It would be wholly unacceptable to allow CO₂ increases and other climate and community impacts on the scale proposed to facilitate an increase in leisure travel, predominantly for the benefit of frequent flyers.

There should be no expansion at Gatwick.

Consultation not fit for purpose

In our view 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.