

**Application by Gatwick Airport Limited for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project (Project Reference: TR020005)**



**Adequacy of Consultation Representation**

**West Sussex County Council**

**July 2023**

**Introduction**

1. This Adequacy of Consultation Representation (the 'Representation') relates to the application by Gatwick Airport Limited (the 'Applicant') for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project (the 'Project').
2. It follows the request by the Planning Inspectorate ('PINS') on 7 July 2023 inviting West Sussex County Council ('WSCC') to submit an 'Adequacy of Consultation Representation', which PINS must have regard to in deciding whether or not to accept the application. WSCC welcomes the inclusion of the appended Consultation Report (Application Document Ref 6.1) for reference, although it should be noted that the Applicant also circulated this to WSCC upon submission to PINS.
3. The Representation sets out WSCC's positions in respect of whether the Applicant has complied with its duties under Sections 42, 47 and 48 of the Planning Act 2008 (the 'Act') with regard to consultation and publicity. This representation also considers whether the Applicant has complied with its duty under Section 49 of the Act to take account of responses to consultation and publicity and the extent to which the Applicant has had regard to guidance issued under Section 50 of the Act.
4. This Adequacy of Consultation Representation only sets out the views of WSCC and it has not been submitted on behalf of any other authority in West Sussex.
5. This Representation does not set out WSCC's views on the merits or otherwise of the application for development consent for the Project. If the application is accepted, those views will form part of any Relevant Representation, Local Impact Report, and other Written Representations submitted during the pre-examination and examination stages.

**Joint Authorities' Adequacy of Consultation Representation**

6. This representation supplements the Joint Local Authorities' Adequacy of Consultation Representation submitted to PINS on 20 July 2023, which was signed by ten local authorities<sup>1</sup> (hereafter the 'Authorities'), including WSCC.

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<sup>1</sup> West Sussex County Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, East Sussex County Council, Kent County Council, Surrey County Council, Mole Valley District Council, Reigate and Banstead Borough Council, and Tandridge District Council.

The joint representation concludes that although the Applicant has complied with its duty to consult and publicise the proposals for the Project as required by Sections 42, 47 and 48 of the Act, the Applicant has **not** complied with its duty under Section 49 of the Act with regards to taking account of responses to consultation and publicity or had regard to guidance issued under Section 50 of the Act.

7. The Authorities conclude that PINS should decline to accept the DCO application to enable more meaningful engagement and consultation. However, should the application be accepted, PINS should ensure that adequate time is allowed to address these matters in the pre-examination period.
8. WSCC fully supports the views expressed in the joint representation and the Authorities’ conclusions, which are not repeated here. Rather, this representation focusses on providing additional supporting information to the above conclusions and addresses the following:
  - *Statement of Community Consultation/Approach to Consultation*: WSCC feedback and the Applicant’s regard to comments raised through the formal consultation on the draft Statement of Community Consultation (SoCC) for the autumn 2021 consultation and the Approach to Consultation document prepared for the summer 2022 consultation;
  - *Third Party Representations*: Comments made to WSCC from the local community and interested groups regarding the adequacy of consultation undertaken by the Applicant; and
  - *Consultation Responses*: How the Applicant has had regard to technical matters raised by WSCC through statutory rounds of consultation, as evidenced in the Consultation Report.

**Statement of Community Consultation/Approach to Consultation**

9. The Applicant provided a draft SoCC for comment for the first round of statutory consultation in autumn 2021 and an Approach to Consultation document for the second statutory consultation in summer 2022. WSCC provided the Applicant with feedback on both these documents within the required timeframes. Table 1 below provides details on the key points raised by WSCC during these rounds of consultation, and how they have been responded to by the Applicant.

<b>Table 1: Feedback from WSCC on Draft SoCC and Approach to Consultation</b>	
<b>WSCC Feedback</b>	<b>Applicant Response/Regard given in the Consultation Report</b>
<b>Autumn 2021 Consultation (SoCC produced)</b>	
To provide a clearer summary of the Development Consent Order (DCO) process in the SoCC itself, in order to assist the public and other stakeholders in understanding what	A more detailed figure was included in the final SoCC but with no dates/clear timeline for stakeholders to understand.

<b>Table 1: Feedback from WSCC on Draft SoCC and Approach to Consultation</b>	
<b>WSCC Feedback</b>	<b>Applicant Response/Regard given in the Consultation Report</b>
they are being consulted upon and how they can feed into this process.	
To signpost the reader to the FAQs and advice notes on the PINS website within the SoCC to aid the reader.	Signposting to the PINS website, with contact details was added to the final SoCC.
WSCC reiterated the comments regarding the consideration of a 12-week formal consultation period. WSCC acknowledged the review of the minimum consultation period (which was originally extended from eight to nine weeks); however, nine weeks would still restrict WSCC’s ability to fully engage Members in the process, to allow for local authority internal governance and for members of the public to be given enough time to fully engage in the process. This was important as the amount of material provided during this consultation had not been seen by WSCC beforehand.	The consultation period was extended by the Applicant to 12 weeks as requested.
Confirmation on how the approach to further stages of consultation identified would be agreed with stakeholders and whether consideration would be given to supplementing this consultation with face-to-face meetings if Covid-19 restrictions allowed.	A section was added to commit to consultation on the approach with local authorities on any further rounds of consultation held (which was undertaken, see sections below), but no commitment on face-to-face events was made by the Applicant.
WSCC would have liked to see more details on locations of the mobile exhibition van, document deposit locations and names of media outlets to be published in included within the draft SoCC.	These were subsequently added to the final SoCC by the Applicant.
Requested a freepost address for writing to the Applicant was added.	A freepost address was added to the final SoCC by the Applicant.
<b>Summer 2022 Consultation (Consultation Approach Document)</b>	
Timescales for consultation needs to consider the complexity of the project elements being presented (and the complexity of the messaging) and with the above in mind, more time than the minimum should be considered to allow for this. WSCC suggested a minimum of six weeks for this consultation period.	Consultation period extended from four to six weeks by the Applicant.

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<p>The proposed highways consultation area (Figure 2.1) was considered to be too small. The highway proposals affected roads on the National Strategic Road Network and important local routes between Crawley and Horley, which were of interest to a much wider area in West Sussex and Surrey, as local routes feed into the Longbridge junction. WSCC therefore requested that GAL extend the consultation area to cover Charlwood, Crawley and Horley.</p>	<p>The consultation area was not extended as part of the summer 2022 consultation by the Applicant. The Consultation Report highlights that the final area was based upon Noise Important Areas for road traffic. Although WSCC acknowledge this is important, it is only one aspect of how that area should have been defined. The proposals would also have implications on access and movement through the wider network, which was the reasoning for requesting the widening of the consultation area.</p>
<p>Appropriate public buildings – Confirmation was required on the locations that were used for depositing hard copies of the consultation documents. WSCC requested the suggested two locations was increased.</p>	<p>The Applicant added an additional location to the list of deposit points, where hard copies of the documents would be made available.</p>
<p>From a transport perspective, WSCC wanted to see an updated Preliminary Transport Assessment with additional information included, that was requested in the PEIR consultation response.</p>	<p>This was not provided as part of the consultation materials by the Applicant. The Consultation Report has not given clear reasoning why additional information was not provided.</p>
<p>WSCC queried what additional technical information would be presented (either updated to reflect the consultation, or new to reflect some of the missing baseline information, which was requested at the PEIR stage).</p>	<p>No additional technical information was included by the Applicant. The Consultation Report has not given clear reasoning why additional information was not provided.</p>
<p>WSCC requested that a face-to-face event be included. With Covid-19 restrictions lifted, this offered another method of consultation, especially for those unable to access virtual methods.</p>	<p>The Applicant did not undertake face-to-face events. The Consultation Report states that <i>“Following the success of the online-led approach to the Autumn 2021 Consultation, a similar approach was taken for the Summer 2022 Consultation, including a mix of materials, methods and techniques to remove barriers, promote inclusivity, and encourage engagement”</i>.</p> <p>WSCC would challenge this, by reiterating the importance of including as many methods of consultation as possible, including face-to-face, which would <i>‘remove barriers, promote inclusivity and encourage engagement’</i>.</p>

10. Despite the comments made by WSCC on the draft SoCC, only limited amendments were made by the Applicant. In particular, no changes were made in relation to comments about the limited methods of consultation used and the restricted size of the consultation area in summer 2022. Therefore, it is considered that although the Applicant complied with the procedural requirements of the Act, it did **not** respond adequately to the issues raised. As a result, the consultation with local communities was neither sufficient nor effective and it limited the ability of stakeholders to understand the project, engage with the process, and respond in a meaningful way.

**Third Party Representations**

11. Concerns have been raised by third parties regarding elements of the consultation process and levels of engagement through the pre-application period undertaken by the Applicant.
12. Table 2 below provides further details of the responses received by WSCC from the Gatwick Area Conservation Campaign (GACC) on 13 December 2021 and a local resident on 30 November 2021 (see Appendix A).

<b>Table 2: Third Party Representations to WSCC</b>	
<b>Third Party</b>	<b>Summary of Concerns</b>
GACC, West Sussex Resident	The consultation documentation contained material errors and omissions or gave misleading impressions, including in relation to projections, the economic analysis, noise impacts, and consistency with the Airports National Policy Statement.
GACC, West Sussex Resident	Insufficient information provided to enable consultees to submit properly informed proposals.
GACC	No engagement with community groups or councils in a proactive manner.
GACC	No opportunity for face-to-face meetings was given.
GACC	The consultation was not " <i>based on accurate information that gives consultees a clear view of what is proposed ...</i> " as required by the Act.
GACC, West Sussex Resident	The consultation is not transparent. It does not conform to the Gunning Principles for public consultation.
West Sussex Resident	The consultation did not have sufficient accessible and interpretable information to enable informed responses. In responses to requesting clearer information, the Applicant stated that it would be submitted as part of the formal application. This deliberate restricting of information gives the impression that the Applicant was seeking favourable responses by limiting the information and evidence set out within the PEIR.

13. The above comments from third parties support the view of WSCC that the consultation with local communities was neither sufficient nor effective and it limited the ability of stakeholders to understand the project, engage with the process, and respond in a meaningful way.

### **Consultation Responses**

14. WSCC responded to both rounds of statutory consultation, providing a summary of overarching concerns and detailed technical comments submitted in appendices. The WSCC response to the autumn 2021 consultation raised over 100 different technical issues of concern and the response to the summer 2022 consultation contained over 40 issues of concern. Annexes A and C of the Applicant's Consultation Report (Application Document Ref 6.1) summarise the responses received to the two consultations by theme and summaries of responses by organisation are also provided in Annexes B and D of the Consultation Report.

#### ***Autumn 2021***

15. The summaries of WSCC responses in Annex B (paras 1.76.1–1.76.29) of the Consultation Report are limited to 29 paragraphs and do not include a number of issues that were raised. This includes a number of requests for more detail and information to help WSCC understand the potential impacts of the Project, as well as seeking clarification on a number of methodological issues and suggestions for mitigation strategies. When considering Annex A of the Consultation Report, it is also clear that the detailed points raised by WSCC have not been adequately captured in a number of instances. Furthermore, the Applicant's responses point to various technical documents (Environmental Statement chapters and DCO outline control documents) that have not been shared by the Applicant and which will only be made available if the application is accepted. Therefore, it is not possible to identify whether the Applicant has had regard to the WSCC comments raised.
16. It was anticipated (and discussed through the engagement by the Authorities with the Applicant) that the Topic Working Groups (TWGs) would provide the opportunity to discuss the issues raised through consultation, providing an iterative mechanism to allow better understanding and refinement of the proposals. However, the TWGs have not allowed for productive discussions to move things forward, instead being information-giving exercises (at a very high level) that have been of little help in understanding the impacts of the development or the evidence that underpins the proposals.

#### ***Summer 2022***

17. The summaries of WSCC's comments, set out in Annex D (paras 1.40.1 – 1.40.8), are limited to eight paragraphs. These do not adequately capture the WSCC response to the consultation. Reference is made to requests for more information; however, in most cases that information has not been shared by the Applicant. When considering Annex C, it is also clear that the detailed points raised by WSCC have not been adequately captured in a number of instances. Furthermore, the Applicant's responses point to various technical

documents that have not been shared by the Applicant or discussed in any detail through the TWGs.

18. It is disappointing that there has been so little positive engagement by the Applicant, which has resulted in WSCC still having outstanding technical issues for which no feedback has been provided; this is over 18 months since the first round of consultation. Further details and examples of documents/additional information requested by WSCC can be found in Appendix E of the Authorities' Adequacy of Consultation Representation.

### **Conclusion**

19. The evidence provided in this representation supports the conclusions drawn by the Authorities as set out in the joint Adequacy of Consultation Representation dated 20 July 2023.
20. It is considered that the Applicant has met the procedural requirements of Sections 42, 47 and 48 of the Act with regard to the technical process of consultation and publicity. However, with regard to wider issues of consultation and engagement and regard to guidance and advice on the pre-application process, it is considered that the Applicant has **not** met the requirements of Sections 49 and 50 of the Act, which raises significant concerns (as outlined in this representation).
21. Accordingly, WSCC considers that PINS should decline to accept the DCO application to enable more meaningful engagement and consultation by the Applicant. However, should the application be accepted, PINS should ensure that adequate time is allowed to address these concerns in the pre-examination period.

## Appendix A: Third Party Representations

### Email from Gatwick Area Conservation Committee, 13 December 2021

Dear Council

We are writing to you, as the Host or a Neighbouring Authority, in relation to Gatwick Airport's recently closed consultation regarding its proposals to develop its northern runway so as to bring it into routine use and increase the capacity of the airport.

In our response to the consultation, we stated that, in our view, the consultation was not fit for purpose.

The principal reasons we gave for this were that:

- The air traffic projections in the consultation documentation give an erroneous and misleading impression of the need for the development and are not consistent with the Airports National Policy Statement. The ANPS 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's failure to provide an appropriate and policy compliant assessment of the need for the development means that respondents have not been able to evaluate its proposals adequately.
- The economic analysis in the consultation contains material errors and omissions, as explained more fully in our detailed response. As a result, the consultation gives an erroneous and misleading impression of the benefits and costs of the proposed development.
- The consultation overview document makes unsupportable claims about the employment benefits of the proposed development.
- The consultation mischaracterises the noise impacts of the proposed development, makes unsupportable assertions on noise matters and does not provide sufficient information to allow respondents to evaluate noise impacts in specific areas.
- Information required to enable consultees to submit properly informed proposals has not been provided.

In addition, in our view, Gatwick has not engaged with community groups or Councils in a positive and proactive manner. Questions posed in engagement meetings have not been answered promptly or at all and not all requested engagement meetings have been arranged. No opportunity for face-to-face meetings has been provided.

For these reasons, and others, in our view, the consultation is not "based on accurate information that gives consultees a clear view of what is proposed ..." as required by the Planning Act 2008 Guidance. It also does not provide sufficient information to allow informed responses and it does not permit the "intelligent consideration" required by the Gunning Principles for consultations. We therefore 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.

We have specifically drawn Gatwick Airport's attention to the above matters but have had no response from it.

We note that a number of Councils have expressed similar concerns in their responses. For example:

- Crawley Borough Council's (CBC) response states: "There is a general lack of detail [in the consultation] and we believe that GAL still needs to undertake a significant



volume of further technical work to justify many of the technical assumptions underpinning this Project. This includes fundamental issues such as major evidence and information gaps in the need case for the NRP, particularly in light of national carbon reduction targets but also in relation to the basis for the passenger forecasts and underlying assumptions, and the justification for the level of associated development, including car parking".

- CBC also states: "CBC has made strenuous efforts to identify, consider, and, as far as possible, offer a clear insight into what the impacts of a proposal of this scale would be on its community. Our misgivings expressed in much of the response is that the period offered for consultation fails to recognise the practical issues of mobilising often constrained and limited technical resources within the Council. ... We must point out that the Promoter has an obligation to ensure that adequate consultation includes providing statutory consultees with sufficient time to engage across all technical areas of the Project. This is fundamentally important, given that the Planning Inspectorate will be advising the Secretary of State on whether consultation was adequate, which is a pre-requisite for the Inspectorate to have the confidence to recommend that the applicant carries the proposal forward into Examination."
- East Sussex County Council states: "Given the large number of complex and lengthy consultation documents it has been difficult to fully evaluate the PEIR within the time available" and "Insufficient information has been provided by GAL to enable the basis of its demand forecasts, and how these relate to the capacity that may be provided through the simultaneous use of the Northern Runway, to be properly understood in adequate detail for the local authorities to be able to comment on the impact of the proposals."
- Horsham Council states: " I am particularly concerned that your consultation has not been effective in highlighting your proposed changes to residents in Horsham District, with minimal presence in our District and a high volume of technical documentation with limited summaries. I am therefore very concerned that there will be many residents in the District who will be unaware of the potentially very significant changes increased growth of the airport may bring."
- Surrey County Council states: "We are disappointed at the lack of engagement we have had with GAL on the proposed project leading up to this consultation, especially the limited sharing of technical information, which is in contrast to our experience of working with other promoters of airport expansion schemes in recent years. This has reduced our ability to provide detailed feedback and influence the development of the project. Fundamentally, we need more information on key areas to enable us to understand and develop an informed view of the likely environmental and health effects on our communities as a result of construction and scheme delivery. Our response reflects this and sets out the areas where we have significant concerns and questions that need to be satisfactorily addressed".

We understand that, if an application is submitted, you will be asked to submit an adequacy of consultation (AOC) representation and that the Planning Inspectorate must have regard to any comments it receives from you in deciding whether or not to accept the application.

Our firm view is that Gatwick's consultation was inadequate and not fit for purpose. We do not believe it met the requirements of the Planning Act and we consider that any application based on it should be rejected on the grounds of inadequate consultation unless and until a further, full, consultation is carried out.

We intend to make these views known to the Planning Inspectorate. However, we would be grateful if you would reflect them fully in your AOC representation in due course.

Regards

Chair

Gatwick Area Conservation Committee

**Email from Local Resident, 30 November 2021**

Dear Council,

The planning inspectorate's web site which covers the procedural protocols for public consultations such as Gatwick's use of its north runway, states that if a consultation is deficient / misleading that I should in the first instance complain to the proposer of the scheme. I have done so to GAL. The website then says if there is not satisfactory response then I should complain to the relevant planning authority. I believe that it you. Please register my complaint in accordance to the procedures relevant for this matter. I believe you or I need then notify the secretary of state of this complaint.

Please confirm by return that you have registered this as a complaint.

Below is the evidence and basis for my complaint. Please let me know if you need more information.

Best regards

[Local Resident]

Dear Gatwick,

Please acknowledge receipt of this email confirming that you have it. My postcode for reference is rh13 0ty

I firstly want to complain that I believe your consultation is not transparent or fair and it does not conform to the Gunning Principles for public consultations. My complaint is in line with the complaints procedure outlined in the planning inspectorate guidance for consultations; ref [this webpage](#) on the Planning Inspectorate website.

From the above reference, The Gunning Principles for consultations state:-

"There (should be) sufficient information to give 'intelligent consideration' The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response."

The GAL consultation does not have sufficient accessible/interpretable information to enable me to form an informed opinion.

I have raised my concerns in calls with GAL's noise and business experts during November 2021, and I have been responded to by saying this is a preliminary environmental assessment and that missing data will be supplied when the formal planning inspectorate application is made. This is not acceptable. This looks like an attempt to swerve the need for all info to be publicly presented and strengthens my view that the consultation is inadequate.

GAL's reply to the missing information is that people will be able to see it when it is presented as part of the formal planning application. But that will not be seen by the majority of the public, and by not presenting such information now, GAL will be receiving a more favourable response from the consultation, which of course will be reported by GAL to the planning inspectorate when the formal application is made. This manoeuvre gives the impression that GAL have deliberately restricted what is included in the consultation for the purpose of gaining a more favourable response. That is one of the reasons for my complaint.

I complain to you that your procedural approach appears to use trickery to get planning approval. By using preliminary and outdated data it is quite likely that the outcome of the public consultation is more positive than it would otherwise be. By submitting the outcome from the public consultation with the formal planning inspectorate application you are effectively then submitting a wrong application as it has not presented the public with:

- latest developments and research into climate change
- actual health effects of noise and pollution for people who live under or near the flight paths in an understandable way
- the negative effects on plants and wildlife and the world at large

The evidence for my complaint is detailed below centered on a lack of information for both Economic and noise information. Red text shows the conversation with GAL on calls. **Details of GALS response on 24.11.21.**

Please register my 100% opposition to your scheme and the inadequacy of your consultation.

Economic details :-

1. Your consultation docs quote research on passenger demand from 2012 and 2018 - all before climate change was declared as an emergency by the UK Gov. (ref <https://www.pinsentmasons.com/out-law/analysis/the-climate-emergency-policy-uk> So have passenger climate change attitudes been factored in to the published passenger demand forecasts? Recent polls suggest the public is in favour of more climate targeted taxes. (ref <https://www.theguardian.com/environment/2021/feb/24/carbon-tax-would-be-popular-with-uk-voters-poll-suggests>) Have you done sensitivity modelling on that sentiment re demand forecasting? **The answer given on the GAL call: No and no - reason given is you only have info of intent now. It was stated on the call that a higher case of passenger demand has been used so as to maximise noise impact assessments - but I pointed out that approach will lead to higher economic benefits. Eg We do not know by how much a 1% extra passenger demand inflates the economic benefits and environmental impacts. I believe not enough clarity on the methodology/assumptions has been given - and no sensitivity analysis done regarding likely hood or not of a bias towards higher economic benefits and climate change attitudes. This IMO needs addressing. This I 'think' was accepted on the call. Since my call, COP26 has further changed public perception of climate change and I would say this is an increasing large risk to the passenger demand figures shown in the consultation and associated economic benefits. Today Delta airways states that flying will have to cost more in the near future due to climate change - thats open and frank acceptance from the worlds largest airline that flying demand will have to deal with a higher price of flying - an aspect that has NOT been considered or discussed in the consultation docs. see below. So in summary I think the demand figures are stated without any risk**

**assessment to those figures, whereas in reality there are significant risks that should be considered, but they are not.**

**- <https://www.bbc.co.uk/news/business-59261408> So I cannot come to a judgement on the scheme as I believe the passenger forecast figures do not show the affect of climate policies or sentiments.**

2. In <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/eia.pdf> page 61 table 4.18 the net present value of impacts due to the scheme are listed. Where are the baseline values without the scheme, otherwise a comparison cannot be made. eg for the stated £3.5m increase in sleep disturbance, what is it currently as baseline? Without this I cannot say if £3.5m is a 10% increase or a 110% increase? Therefore how can I assess whether this is a tiny impact or major impact? I can't. **On the call this was described as a fair point, and would be researched. I have had not subsequent reply from Gatwick - so I am left in a position unable to make a judgement on this issue of disbenefits.**
  
3. The overall net benefit of the scheme does not seem to account for the wider environmental impact cost. The extra co2 emmissions will have a monetarised cost which is not shown at all. **On the call it was stated that GAL have followed DfT requirements and guidance, but accepted that worldwide impacts of the increased flights (eg by CCC) is not accounted for outside of the UK. I remarked that there is no 'rule' that says GAL could not have addressed this issue more frankly in light of increased climate concerns. That point was accepted. Regardless of DfT guidance, I find I cannot form a view on the merits of this scheme because I am not informed about the impacts to the world I live in. This IMO is a key flaw in the transparency of the consultation. During the consultation COP26 took place. This has IMO changed the focus of the world. Every activity has to be viewed through a lens of the climate emergency and the 1.5deg increase target, rather than the 2.4degC we are gong to get. Because Gatwick has not been more transparent in telling the true cost of the aircraft emissions due to the scheme, I cannot come to an informed judgement.**
  
4. Your forecasts assume and I quote 'R3 at Heathrow will not come forward'. (ref <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/overview.pdf> 6.4.3 page 82. What does that statement mean? Do you mean Heathrow's runway will not be built sooner in time than planned, or not at all? **In fact, on the call with GAL, it was stated the passenger forecasts for the GAL scheme are based on the assumption that the new Heathrow runway will NOT be built at all. <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/eia.pdf> at 4.9 page 29. I pointed out this stance was not understandable from how it was written. So where is the forecast and related reduced economic benefits if Heathrow r3 does take place? I was told this will be done for the planning inspectorate application. I said the public will not be aware of this as no further public consultation will be made. I was told there is a route that the public can register an interest when the formal planning application is made and can comment on the revised figures then. I think this is an incorrect way of proceeding. What if the passenger forecast is 35% less with Heathrow.... and eg 25% less due to climate change attitudes..where is that risk/ sensitivity analysis? Would the benefits of the GAL scheme stand up then? Who knows? I really don't, so how can you ask me to make an informed response now without this information? I cannot judge. Further I do not believe that adding**

**missing risk analysis figures to only the full planning application will give the wider public a chance to reappraise the merits of the scheme, which means that this consultation has again failed to enable me to make an informed decision.**

5. How is the continuing financial loss during the pandemic going to be recovered? I ask because Heathrow is raising landing fees - is that an option for Gatwick too? (Higher fees = lower travel demand.) **On the call it was stated this may or may not be an option - so this 'may' or 'may not' lead to lower demand. IMO this is another significant risk to the passenger forecast levels and needs to be added to the sensitivity analysis of the above points. I do not know for example if GAL will raise landing fees by 50% to cover covid based loses, loses that may well continue far longer than GAL currently foresees - so in turn I cannot judge whether any new runway will be required in the time scales of the scheme (higher price=lower demand). So you could label the consultation very premature in this regard. GAL are assuming a 5 year suppressed demand, yet Austria is now back into full lockdown, and the highly likely occurrence of new covid variants seems to have been forgotten about by GAL. Covid is NOT over by any means, and only will be when the whole world is immune or vaccinated. Covid impact is very likely to be more than 5 years and is therefore a significant but unmonetarised risk to GAL's scheme. The need for updated booster jabs to counter new covid variants will continue for years which in turn may suppress the desire to travel as other countries will differ wildly in their resilience to covid at any particular time. see:- <https://inews.co.uk/news/health/covid-vaccine-boosters-needed-many-years-as-immunity-fade-government-scientists-predict-1129223>**
  
6. Do your forecasts take a view on whether kerosene will be taxed in UK or EU? or vat applied to fares? It is looking very likely that the EU will put more tax on aircraft fuel which will impact demand. <https://www.reuters.com/business/aerospace-defense/eu-climate-blueprint-pressures-airlines-cut-emissions-2021-07-14/> **On the call it was stated this might not have been assessed - so this may or may not lead to lower demand. IMO this needs to be added to the sensitivity analysis of above points. To be done? Since my call it has been confirmed that the EU will be taxing aircraft fuel, and will adopt a value based on energy content rather than volume. [https://ec.europa.eu/taxation\\_customs/green-taxation-0/revision-energy-taxation-directive\\_en#:~:text=On%20the%20of%20the%20Energy%20Taxation%20Directive.&text=In%20this%20way%2C%20we%20can,growth%20than%20taxes%20on%20labour.](https://ec.europa.eu/taxation_customs/green-taxation-0/revision-energy-taxation-directive_en#:~:text=On%20the%20of%20the%20Energy%20Taxation%20Directive.&text=In%20this%20way%2C%20we%20can,growth%20than%20taxes%20on%20labour.) So this tax is coming and yet has not been mentioned or assessed by GAL at all as a risk factor for the passenger demand forecasts. Will the forecast be 5%, 10% or 20% lower due to increased taxes? Will the net economic benefits then balance the net damages? I can't form a view if the sensitivity analysis has not been done and I do not believe anyone else can either.**
  
7. On page 61 of the same doc in point 2 above, Dementia is mentioned as an impacted issue with a ♦ cost. What number of people have been assumed will be newly affected by dementia because of the project? Additionally, what number of people have been assumed to be affected by sleep disturbance? What are the baseline numbers in 2018? **On the call it was stated this was unknown but will be looked into and may be added to the application once**

**made. I remarked that without such numbers I cannot make a human interpretation of the magnitude of the impact; £3.5m is meaningless without a reference that is understandable. So once again I cannot form a judgement/response on this scheme purely because the consultation does not give me sufficient information to do so.**

In <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol2/peir-figure-15.6.2.pdf> shows a map of the assessed area for NO and particulate pollutants. Where are the diagrams/maps which show the increase of NO/ particulate pm2.5 pollution matter across this area? Without this I cannot know WHERE you are predicting there will be increases in these polluting metrics. There are only tables of locations that are shown

in <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol3/peir-appendix-13.9.1.pdf> but these are useless in allowing me to assess impacts near me in a geospatial way. (un-interpretable). **On the call it was stated that I am correct and that the next stage will show this, I again countered that the public wont be able to see and comment on this. As per previous questions I was told there is a route by which the public can register interest when the formal planning application is made and can comment on the revised figures then. I made the point that without such map based info now , people would look at the mapped area and assume that because there is no map showing little red squares of increase that all is ok - and lead unfairly to a strengthening view that the GAL scheme is all OK. IMO the use of preliminary environmental assessments is not enough for people to have a informed position.**