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20^h October 2023

Dear Sirs.

Additional Comments in response to submission from Gatwick Airport Limited (GAL), Development Consent Order application, Autumn 2021 and subsequent consultations up to October 2023. Please reference ARHS' submission registration identification number is: 20043410

Note; this submission is in addition to that submitted on 19th October whereon only a small box was available on the page and my comments had not been elaborated fully at that time. I was of the understanding that additional material could be submitted up to the deadline of 29th October, 2023 and not that there was only a single opportunity to make other points. Please therefore accept this additional material.

Gatwick (GAL) should be required to include the full costs associated with the proposed expansion into their budget and explain how all such measures will be paid for, and by whom. In addition, Gatwick should be required to pay fully for local business rates to the affected communities and should not be exempt for payment of fuel tax which is such a large contributor to airborne and other pollution.

1. Overall

Gatwick's (GAL) overall case for expansion does not comply with the Airports National Policy Statement which requires airports (other than Heathrow) to demonstrate sufficient need to justify their expansion proposals, additional to (or different from) the need which would be met by the provision of a Northwest Runway at Heathrow. The relative proximity of the two airports should not be used to justify an increase traffic at Gatwick airport regardless of whether the Heathrow expansion eventually goes ahead.

2. Passenger Numbers

Huge increase in passenger numbers would benefit the owners and shareholders of Gatwick (GAL), yet Gatwick (GAL) is apparently unprepared to pay for very substantial and costly improvements to the rail and road network which their proposed expansion would require. They claim this is not their responsibility, yet they would reap the benefits while local taxpayers, adversely affected by the expansion in many ways, would be the ones to pay via rates and taxes. This is inequitable and Gatwick (GAL) should be required to include the full costs associated with the proposed expansion into their budget and explain how all such measures will be paid for, and by whom. In addition, Gatwick should be required to pay fully for local business rates and should not be exempt for payment of fuel tax which is such a large contributor to airborne and other pollution. The expansion would apparently lead to an increase in CO2 emissions by some 1+ million tons per year from a current 4.5-6.3 million tons/year. (The range reflects different calculation methods.) It is noted

that Gatwick is sited at the extreme northern margin of West Sussex meaning that a very large amount of the negative impact is borne by Surrey who get none of the business rates and other income from Gatwick. This is inequitable.

3. Emissions and their control

Expansion on the scale proposed would very substantially increase the CO₂ and other emissions and worsen the climate damage associated with Gatwick's operations and flights. Apparently there are currently no proven technologies for reducing aviation emissions at scale. Expansion of Gatwick would therefore have a material impact on the UK's ability to meet its carbon reduction targets and should not be excluded from these. Carbon emissions will also result from construction works and increased road traffic to the airport. Flights and ground traffic will make air pollution worse, impacting the local population, the Gatwick workforce and the entire environment.

This increased environmental damage from CO₂, NO_x, ultra fine particulates, most notably rubber from tyres, both from the road traffic and also from the aircraft taxiing, take-offs and landings, will increase with more, larger aircraft. It is understood that Gatwick do not measure or record such ultra-fine particulate matter and therefore are not in a position to address increases in its creation or distribution. An exhaustive model using real, very recent and current data must be an essential part of any environmental modelling which should be submitted as part of their justification process. Given the increasingly variable climate conditions we are experiencing across the World such data should cover a minimum of ten years starting from, say 2015.

4. Ground Transport

Gatwick's targets to increase how many people use bus, train, walk and cycle are insufficient to prevent a massive increase in road traffic around the airport. I find it a strange tokenism that Gatwick even includes numbers for those who walk and cycle to the airport which must be a minute proportion of the total. This increase in traffic will increase congestion on local roads and increase off-airport parking. Gatwick do not propose to provide any extra rail services but the project will increase pressure on future train services. While many passengers arriving by train will use the already crowded London-Brighton Line, those travelling from Reading and The Midlands have to rely on a system using two-coach diesel units and intermediate stations which in some cases are not even accessible to those with mobility needs and multiple level crossings which cause bottlenecks in the road network. Local roads are not suited to major upgrades, yet much of the increased passenger and workforce numbers will entail travel on the local, often rural, road network.

5. Employment

Gatwick's projections of extra jobs are likely to be very optimistic overall, particularly once (temporary) construction work jobs are excluded. Many of the extra jobs will actually be superseded by automation of operations and jobs related to production of goods and services may be far from the site which may be of little or no benefit to the local community at least.

Many of the alleged new jobs would be relatively low paid so that such employees are unlikely to afford housing in the immediate area and so are likely to have to commute long distances on a daily basis. There is already a shortage of housing, especially affordable housing, in the South-East. Construction of this housing on Green Belt land or beyond would lead to further increases in population density in the South-East which is to be resisted.

6. Revised airport layout

It is unclear to me whether it is practicable to accommodate two taxiways, one each for W-E and E-W taxiing aircraft as well as converting the existing taxiway into a full runway, albeit of reduced length, and widening the existing one while leaving enough clearance between both runways and both taxiways. Will there still be an emergency runway provision or do Gatwick (GAL) claim that the second runway will permit emergency

landings (and take-offs)? Presumably a large proportion of the taxiing aircraft will have to cross one or both live runways in order to reach the requisite terminal. Can this be achieved while maintaining the intended take off and landing frequencies?

7. Runoff and waste water treatment

Additional hard surfacing; roads, runway, taxiways and another 10,000 capacity car park spaces will all increase runoff intensity which the low gradient River Mole will struggle to accommodate. Detention ponds may slow peak discharges but all this water should be fully treated to remove chemical and ultrafine particulate matter which will not settle out in any realistic time period of “settling”. The fine particulate matter includes “rubber”, actually a mixture of natural rubber, carbon black, synthetic filler, etc, which has an overall density not very different to that of water, so much may not settle out in a real time scenario and so, in turn, is likely to be illegally discharged into the River Mole as a non- biodegradable pollutant. Real-time monitoring of all such criteria needs to be mandatory and transparent.

Over the years the River Mole and its tributaries have flooded, especially when the Gatwick (GAL) sewage treatment plants discharge partially or untreated water in extreme events. It is not clear to me whether the discharges correspond solely to genuine extreme events or also include routine discharges, as seems to be the case with very many sewage treatment works across the country. Climate change is making extreme events more frequent and severe. Expansion of the Airport, and other developments locally, need to properly take this into account with the necessary treatment capacity installed before other construction commences.

There should be a major increase to sewage treatment works capacity, which should include an allowance, without any spillage to the river for, say, up to a 20-year storm, based on recent data. Gatwick should be legally required to record all discharges and monitor quality, continuously 24/7 with immediate, automatic fines rising exponentially for extended or repeated, untreated or substandard discharges. Data must be continuously released and be accessible in real time to the public if they are to have confidence in the veracity of the data.

8. Noise

The switch to all landings from E-W on the existing runway and all take-offs (mostly on the new runway) also from E-W mean there will be no respite for residents under the flight paths from 6am until midnight. Even if peak noise levels do not increase, their frequency will do so and would mean that affected residents may have to cease any outdoor conversations for 20 seconds every 30-40 seconds. This cannot be justifiable. The chairman and all members of the board should be required to actually live for a full year or more under such circumstances; i.e., not just rent such houses but actually spend the time there with their whole families, not elsewhere.

The noise envelope Gatwick has proposed is not consistent with government policy and CAA guidance and data have been selectively chosen to favour the Gatwick owner’s case I understand. They should be substantially revised to be a true and fair representation of the current and future circumstances.

A ban on night flights should be a condition of any expansion at Gatwick. The airport should also be required to set out a comprehensive package of measures to incentivise the use of the quietest aircraft at night outside the hours of a ban.

9. Economics

The economic benefits of the proposed expansion have apparently been overstated by Gatwick (GAL). Significant economic, social and environmental costs have been ignored or understated. The economic benefits of air transport growth are subject to diminishing returns. In an already highly connected economy such as the UK, additional economic benefits from further expanding air transport are largely dependent on net inbound tourism and business travel growth. Both of these are absent in the UK today (more people fly to holidays overseas than come here and business travel has apparently flat-lined in the UK since 2006).

When Gatwick's scheme costs, benefits, and the long-term societal risks are taken into account, the scheme's economic case is no longer sound and entails unreasonable levels of risk. As an example mentioned above the cost of carbon emissions cited by Gatwick uses very outdated unit costs and therefore the financial impact is grossly understated.

In addition, the proposed scheme will seek to incentivise UK residents to spend more overseas, which will cost jobs and economic activity at home, particularly in the poorest parts of the UK, contradicting the government's levelling-up agenda.

Gatwick (GAL) should be required to include the full costs associated with the proposed expansion into their budget and explain how all such measures will be paid for, and by whom. In addition Gatwick should be required to pay fully for local business rates and should not be exempt for payment of fuel tax which is such a large contributor to airborne and other pollution.

Is the expansion justifiable given the increasing recognition that airplane travel is disproportionately damaging to the environment in terms of CO₂, NO_x and (the full range of) particulate matter (sizes and types)?

Foreign holidays may be nice but they are neither a right, nor a "must have". With global warming and climate change people should be encouraged more actively to take vacations, if they can afford them at all, in the UK.

In summary

This proposed growth at Gatwick will have a huge adverse environmental effect on our communities and countryside. The only people to benefit will be Gatwick (GAL) shareholders. This entire scheme should therefore be rejected.

Yours faithfully,

Alan Smallwood