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Date: 27 October 2023  
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By email only to:  
GatwickAirport@planninginspectorate.gov.uk

Dear Madam/Sir

**Application by Gatwick Airport Limited for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project**

The following provides the Relevant Representation of Brighton & Hove City Council (BHCC) in response to the application by Gatwick Airport Limited (GAL) for a Development Consent Order relating to the Northern Runway.

This sets out our main concerns with the environmental, social and economic impact of the proposal on Brighton & Hove.

BHCC raises an objection to the proposal on the basis of the issues set out below.

Climate Change

We note the national commitment to net zero carbon by 2050, including net zero aviation, as set out in the Jet Zero Strategy (DfT 2022). In addition, BHCC has made a local commitment to becoming carbon neutral by 2030.

As such, we have concerns that the proposed intensification of the use of Gatwick Airport will compromise these targets and contribute to climate change as it will result in increased flights. These are a key contributor to climate change, and we note the criticisms levelled at the Jet Zero Strategy on the basis that it relies on future technology, rather than a reduction in the number of flights.

We note in particular that the cumulative impact of the proposed increased air traffic movements (ATMs) at Gatwick alongside those proposed at other UK airports has not been considered.

We note also the mitigation set out in the Greenhouse Gases chapter of the Environmental Statement, much of which relies on the Carbon Action Plan in which the measures are vague. Even for the direct measures targeting aviation, these are identified as 'potential' measures, the timescales are not quantified and therefore not enforceable ('medium' and 'long' term), and there are 'potential' deliverables.

We appreciate that some measures will be outside the control of the airport as they are the responsibility of airlines, but the intensification of the use will result directly in impacts on climate change.

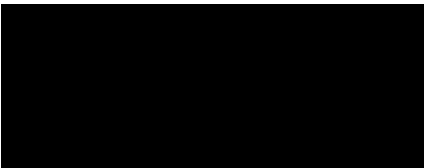
The impact of the scheme on climate change in terms of journeys to/from the airport by passengers and staff is also of concern and we do not consider the sustainable transportation targets go far enough. We consider sufficient investment in adequate, additional measures to make sustainable forms of transport more attractive is essential if the airport's relatively modest objective of increasing the proportion of passengers using sustainable forms of transport from 48% in 2020 to 55% by 2030 is to be met.

However, it is recommended that the airport's sustainable transport targets for passengers and staff should be more ambitious, especially for passengers, and supported by corresponding levels of investment. This should include services and infrastructure, and alongside rail infrastructure should include improved bus and coach connections to enable longer distance inter-urban journeys through ongoing liaison with public transport officers.

For this reason, we do not consider the mitigation measures proposed to be sufficient to make the impact of the scheme on the environment acceptable.

We object to the proposal on this basis.

Yours sincerely



**Jane Moseley**  
Planning Manager | Development Management – East  
Brighton & Hove City Council