

RELEVANT REPRESENTATIONS

1. Introduction

- 1.1. CAGNE is the umbrella aviation and community group for Sussex, Surrey, and Kent formed in February 2014. When it comes to Gatwick Airport operations, we seek to be fair to all communities and the planet. CAGNE has a strong online presence and a membership of over 5,000 and has played an active role throughout this process and that of the Airport Commission work in 2015.
- 1.2. CAGNE's main concerns are summarised below and stand as CAGNE's Relevant Representation (RR). CAGNE will refine and amplify its case through its written representations. With community support CAGNE has appointed qualified experts in aviation noise, air quality and surface infrastructure headed up by a barrister from Francis Taylor Buildings and Leigh Day Solicitors.
- 1.3. Overall, CAGNE objects to the Northern Runway Project (NRP) and will request that this DCO application is refused.
- 1.4. The project conflicts with national policy (namely, the Airports NPS and the "Making Best Use of Existing Runways" policy (2018)), not least as it will introduce a new runway at Gatwick. The significant negative environmental and social impacts associated with the project (including (but not limited to) the associated (i) noise increases, (ii) declines in air quality, (iii) traffic impacts due to inadequate surface access and (iv) climate impacts), along with the lack of transparency as to any suggested community investment beyond the airport, substantially outweigh any purported benefits. If approved, the project will result in serious detriment to local communities and nature in the areas of Sussex, Surrey, and Kent, as well as the planet beyond. Moreover, the project will effectively thwart the long-standing and careful national planning for airport expansion in the Southeast. By jumping the gun in this way, before robust and necessary cumulative assessments can be carried out (not least in relation to the policy-supported third runway project at Heathrow), the NRP risks undermining the national airport policy framework and resulting in an unjustified environmental cost to expanding airport capacity in the southeast.

2. The Project Conflicts with National Policy on Airport Expansion

- 2.1. Government policy on airport expansion is set out in the Airports NPS and in the "Making Best Use of Existing Runways" policy ("MBU") (both dated June 2018). The Airports NPS clearly supports only one new runway in the Southeast and chooses Heathrow to deliver this via its third runway project.
- 2.2. The NRP will effectively result in a new runway at Gatwick. GAL seeks to emphasise that the project works will relate to Gatwick's existing emergency / stand-by runway. However, the scope of works involved is extensive (involving significant changes to, and introduction of, new taxiways and airport facilities, including a new aircraft holding area and new pier) and the entire centreline of that "existing" runway will need to be moved 12m to the north. As a result of these works, Gatwick will be able to operate two runways in a way that is currently impossible, effectively resulting in a new runway and allowing for dual-runway airspace. This is in contrast to the present situation where Gatwick can only ever operate one of its runways (main or emergency) at any given time. In short, the NRP will transform Gatwick from a single-runway

airport to effectively a dual-runway airport. That does not fall within the MBU Policy, nor is it supported by the Airport NPS. The NRP is not making best use of an “existing runway”, it is effectively producing a new runway.

- 2.3. Indeed, the scale of the NRP as a Nationally Significant Infrastructure Project (both in aviation and highways terms) is also indicative that the project goes beyond the local planning focus of the MBU policy (see MBU at 1.29), which remains a relevant policy within this process.
- 2.4. Furthermore, because the NRP conflicts with national airport policy, it means that, were the NRP to be approved, the national benefits associated with expanding airport capacity in the Southeast would only be achieved in part but alongside a disproportionate amount of harm.
- 2.5. In this context, the failure to carry out a proper cumulative effects assessment of Heathrow’s expansion along with the NRP (notwithstanding PINS’ request that this be included in the Environmental Statement (“ES”)) breaches the EIA Regulations and undermines the lawfulness of the application materials. The “sensitivity test” included in Chapter 20 is inadequate.

3. Surface Access and Transport Impacts

- 3.1. Surface access has always been a main issue for expansion at Gatwick (and a key reason why the Airport Commission found in favour of Heathrow over Gatwick as the location for a new runway in 2015).
- 3.2. The NRP’s impact on surface access is unacceptable. CAGNE has instructed expert transport consultants to review the Applicant’s transport assessment in the ES who have concluded that the ES omits various matters which means that impacts are either not assessed at all or adverse impacts are downplayed. Furthermore, there is a lack of transparency regarding the Applicant’s modelling of surface access, which has prevented interested parties from properly scrutinising the data. We expect the Applicant to provide this information early on in the examination process.
- 3.3. We reserve the right to submit more detailed representations in relation to the Applicant’s transport assessment in due course, but issues include (by way of example only):
 - the modelling is strategic in nature, lacking any detailed analysis of local traffic conditions affected by the scheme beyond the immediate environs of the airport
 - there is a failure to consider operational effects at junctions beyond the modelled area
 - there are various inconsistencies and inaccuracies in the selection of the assessed peak time periods
 - the Applicant’s reliance on rail use, notwithstanding known capacity issues and infrastructure restrictions and the Applicant’s limited control over timetables
 - the proposed mitigations are inadequate to address the Scheme’s impacts and (to the extent they are relied upon) have not been appropriately secured within the DCO’s requirements
- 3.4. Of course, the predicted transport impacts of the scheme will factor into various other assessments the scheme’s environmental impacts, including air quality and noise.

Therefore, to the extent that the Applicant's transport modelling and assessment is inadequate, this will have knock-on impacts on the assessments of these other matters.

- 3.5. CAGNE also has real concerns about the impacts which the Applicant's proposals to increase freight movements will have on local transport infrastructure and about the surface access constraints in terms of road linkages east and west of the airport.

4. Noise

- 4.1. CAGNE take noise to be a fundamental issue of this project and have therefore appointed acoustic consultants to conduct an expert review the noise documentation.
- 4.2. The review has identified major issues and inconsistencies within the noise documentation. The areas affected include, but are not limited to, UK aviation noise policy, assessment methodologies, baseline noise measurements, noise modelling, mitigation, and results. As such, CAGNE does not accept that the ES assessment of noise impacts is adequate and reserves the right to further comment on such inadequacy, such as within our Written Representations.
- 4.3. CAGNE has been party to the Noise Management Board (NMB) and Noise Envelope (NE) working groups. Both NMB and NE have been flawed processes, with Gatwick using these platforms as 'tick box' exercises only.
- 4.4. This sits alongside our view that the NE does not offer certainty, with GAL's proposal that noise contour limits could increase in the future [APP-177].
- 4.5. The 'enhanced' noise insulation scheme proposed by GAL is not comparable to what is considered current industry best practice, such as that proposed for Luton Airport's current expansion proposals. GAL over-emphasise its benefits, and in some cases the proposals could even lead to properties being provided with less mitigation than is currently available. In addition, no allowance has been made for any negative impacts from FASI-S airspace changes.
- 4.6. Night flights are also a major concern for residents. Residents wish to see a night ban at Gatwick Airport to allow for 8 hours of undisturbed sleep as WHO recommend. The assessment of sleep awakenings undertaken by GAL does not take account of the approach adopted by other recent UK airport applications nor does it include all relevant noise sources, leading it to incorrect conclusions. We also note the government's ongoing consultation on this issue (of night time flights and the government's policy in relation to them). This is in a context in which there has recently been increased understanding and appreciation of the serious health impacts of noise and light pollution (see, for example, the recent report of the House of Lords Science and Technology Committee "The neglected pollutants: the effects of artificial light and noise on human health" (July 2023) 2nd Report of Session 2022-23).
- 4.7. More generally, the application noise documentation is inconsistent and important information is not portrayed transparently. Nor does it contain all the necessary information to allow a proper review. Both technical appraisal and the layperson's reading of the documentation is impeded by layout and formatting. These factors limit the ability of any reader to identify effects and draw key conclusions from the noise assessments.
- 4.8. CAGNE also raise the following issues in relation to noise impacts:

- a. **Gatwick has misled residents** by detailing that there will be no new flight paths (CAP1908) from the new runway, notwithstanding that Gatwick is concurrently progressing the government's modernisation of airspace (FASIS) requesting new airspace for a dual runway operation. The fact that the applicant is being disingenuous with the truth about FASIS (having applied for a dual-runway airspace and new flight paths over new areas) must be seen as unacceptable.
- b. **The lack of true compensation** is a major issue and does not reach out to areas significantly impacted by noise currently, or take on board the fact that many homes are listed, and have secondary requirements for new insulation (for example, you can only receive insulation once).
- c. **Light pollution of aircraft and ground operations** impact residents and wildlife, yet little is mentioned of this in the application. Night flights are a major concern for residents and cause sleep deprivation with medical evidence showing the health impacts they cause. Long-haul flights (an area Gatwick seeks significant growth in to facilitate increases in freight) fly lower when laden and, as such, increase noise impact.

5. Air Quality Impacts

- 5.1. The NRP will have an unacceptable impact on air quality. CAGNE has instructed air quality specialists to review the information provided on air quality in the Environmental Statement (ES). They did not have confidence in the results based on the evidence provided in the ES.
- 5.2. A number of errors in the chapter have been identified and there is concern regarding the lack of detail provided on the emissions and air quality modelling (despite the length of the chapter and its appendices). The model files need to be made available for scrutiny by us and other interested parties. This will enable a proper review of technical matters. Notwithstanding the limited information provided, various issues have been identified, including (by way of example only):
 - The dispersion model results exceed Defra's recommended maximum error in over half the modelled zones, and no information is provided on the validation of the PM (PM₁₀ and PM_{2.5}) model results. As it stands there is significant uncertainty in the predicted results which is not discussed and suggests the data cannot be relied upon to form a judgement of significance.
 - The Applicant has failed to provide an assessment of ultra fine particles (UFP) in the air quality chapter. PM_{2.5} is not a good indicator of UFP, despite the Applicant's claim. The former is based on mass and the latter is based on number of particles. As UFP have very little mass there is no direct correlation. It is known that both aircraft and road traffic are a source of UFP. The importance of aircraft UFP emissions is reflected in the establishment by the International Civil Aviation Organisation (ICAO) of a mandatory method for reporting non-volatile UFPs for new commercial aircraft.
 - The ES has failed to consider the implications of the increase in NO_x emissions in the context of the need to reduce emissions under UN Convention on Long-range Transboundary Air Pollution and the National Emissions Ceilings Directive, particularly in relation to the contribution of aviation.

- 5.3. The Applicant has not presented any consideration of how the uptake of sustainable aviation fuels (SAFs) (government policy) will affect the assessment.
- 5.4. Furthermore, the assessment of the impact on members of the public using the airport, such as passengers does not appear to be carried out despite a statement that it has been considered.
- 5.5. As with the assessment of transport impacts, the Applicant's air quality assessment feeds into other environmental assessments, including the Health and Wellbeing quantitative assessment, such that any errors or inadequacies in the assessment of air quality will infect these other assessments.
- 5.6. The applicant has not conducted a 'damage cost' calculation in line with the Air quality and emissions mitigation guidance for Sussex (2021).
- 5.7. Defra's damage cost method (Air quality appraisal: damage cost guidance (updated March 2023)) is often used across the country to assess the impact of major development on air quality. The damage is often used as a guide to what the applicant should spend on air quality mitigation. Both guidance documents (Defra's Air quality appraisal guidance and the Air quality and emissions mitigation guidance for Sussex (2021)) were referred to by PINS in their scoping response.
- 5.8. Overall, the Applicant's failure to carry out any damage cost calculation is a clear omission. CAGNE's experts have carried out an indicative calculation, using information from the ES chapter. This method of assessment puts the damage to society caused by emissions between 2029 and 2047 at around £54 million, and maybe up to £198 million (taking the upper bound). However, the Applicant needs to carry out this calculation in order to adequately demonstrate the impacts of the scheme and inform the extent of mitigation required.

6. Climate change impacts

- 6.1. The airport must be held responsible for the full emissions produced from both aviation and ground operations. There is no doubt that the NRP will result in a considerable increase in greenhouse gas emissions (GHGs), as well as non-CO₂ emissions. That is evident from the Applicant's own documentation (including the ES, Chapter 16). The question then is how "significant" the increase in these emissions are and what weight should be attributed to them in the planning balance. These are matters of planning judgment on which CAGNE reserves the right to make further submissions. Overall, CAGNE does not accept the Applicant's approach to assessing (and discounting) the significance of the project's climate change impacts, which it considers to be fundamentally flawed.
- 6.2. The airport must be congratulated for seeking to reduce ground emissions but this does not outweigh, nor go near to addressing, the impact that such a significant increase in ground and air movements arising from the project will have on the Net Zero goals.
- 6.3. The project's climate impact must be seen within the context of a recognised climate emergency and in light of the most up-to-date scientific analysis. The IEMA guidance (2022) (which the Applicant cites to and relies on) is clear on the need for practitioners, in assessing significance of climate impacts, to evaluate the prevailing evidence at the time, including the guidance of expert bodies such as the Committee on Climate Change (CCC) on necessary policy developments and whether existing policy is insufficient or not in line with the science-based 1.5°C compatible trajectory towards net zero (see e.g. IEMA guidance pp. 24 and 27).

- 6.4. The Applicant's ES assessment (Chapter 16) nevertheless ignores the CCC's clear and up-to-date scientific advice that there should be no net expansion of UK airports, if the UK is to ensure aviation can achieve the required pathway for UK aviation emissions to meet the necessary targets (CCC's Sixth Carbon Budget Advice). Most recently, in the CCC's Progress Report to Parliament, dated June 2023, the CCC emphasised that expansion projects at UK airports were "incompatible with the UK's Net Zero target unless aviation's carbon-intensity is outperforming the Government's pathway and can accommodate the additional demand" (p. 267). It clearly stated that current Government policy "is not delivering an outcome consistent with this" (p.276) and that included an assessment of the Government's Jet Zero Strategy (JZS), which it described as "high risk" (carrying "considerable risks"), not least due to its reliance on nascent technology over the period up to the Sixth Carbon Budget (p. 267). Overall, the CCC concluded (under "policy assessment") that – for aviation – the "required emissions reduction for the Sixth Carbon Budget period is...at significant risk" (p. 278), cautioning that no airport expansion should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control section CO₂ emissions and non-CO₂ effects (such a management framework has not been established).
- 6.5. The CCC's recent advice clearly questions the approach taken in the JZS (on which the Applicant so heavily relies to discount the significance of the NRP's climate impacts). As with any policy relevant to planning decision-making, the weight to be given to a policy can be reduced, partly or wholly, where it has been overtaken by events. This is especially so where a policy addresses science-based matters, but those matters move on. That is what has happened to the JZS and very little weight can be placed on the JZS in addressing the NRP's climate impacts.
- 6.6. In light of this advice, and other evidence, CAGNE disputes that the climate impacts of the project are not significant. Indeed, it is difficult to see how the Applicant can argue that the project (which will undoubtedly result in a substantial increase in GHGs) will somehow contribute to *reducing* GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050. CAGNE reserves the right to submit further representations as to why the JZS cannot be relied on as a *carte blanche* for the emissions impacts of any airport expansion project (especially in light of its "high risk" approach and reliance on the introduction of new technologies and fuels).
- 6.7. CAGNE also maintains that the increase in GHGs from the project will have a "material impact" on the ability of the Government to meet its climate change targets (including the Net Zero target in 2050) and, in any event there is no question that any climate change impacts will be a factor that weighs in the planning balance and can be of determinative weight. CAGNE reserves the right to make further representations on the Airports NPS and National Networks NPS policy, and the extent to which they are relevant to the application, including the correct interpretation of these policies as to the consideration of climate impacts.
- 6.8. To the extent that it is relied on by the Applicant, CAGNE does not consider that the commitments made under the Carbon Action Plan and Surface Access Commitments are robust enough or that they have been sufficiently secured through the draft DCO's requirements. Moreover, to the extent that there is any reliance (whether at the policy or project level) on carbon trading and offsetting schemes (such as CORSIA and the UK ETS), these are not considered to be acceptable mitigation for expansion impacts.

CAGNE also disputes the Applicant's approach to non-CO₂ impacts (the effects of which the ES does not attempt to quantify), which requires further assessment.

- 6.9. We adopt the Aviation Environment Federation and New Economics Foundation submissions.

7. Economic Impacts

Lack of Staff

- 7.1. CAGNE has real concerns over the sustainability of the NRP project, and questions the alleged socio-economic benefits relied on by GAL. As the Airport Commission found, Gatwick Airport is surrounded by areas that do not have mass unemployment. Gatwick is claiming that it will create 630 additional jobs at the airport. This would cause a lot of inward migration of workers to fill any vacancies as vacancies struggle to be filled today. The jobs being offered are also, in general, low skilled. As such, a major concern is the lack of affordable housing close to the airport and a lack of land to build any new affordable housing on (not least, water neutrality is preventing building at present in neighbouring areas), as such housing is at a premium locally and is expensive to rent or buy. This combines with a recognised lack of amenities in local areas, such as healthcare provision and schools. Gatwick's proposals to try to reduce the numbers of workers travelling by road are also not feasible, nor does Gatwick seek to ensure workers travel by public transport or provide free bus services from areas where staffing will be forthcoming (for example, Croydon or coastal areas). The NRP will place an unacceptable pressure on adjacent areas in Sussex and Surrey whilst adding additional workers to the residential road system due to poor public transport links, services, and travel costs. We have concerns in this regard in relation to both operational and construction staff.
- 7.2. We note that the Housing Need paper (January 2021) for the Crawley Local Plan details the issues Gatwick Airport causes and CAGNE will look to expand upon these points at the written representation stage.
- 7.3.
- 7.4. Furthermore, Gatwick's business model is leisure travel and, as such, it is hardest hit by any downturn. We, therefore, expect redundancies to be forthcoming. With automation and Gatwick's volatility we do not believe jobs will materialise and, even if they do, they will continue to be low-cost retail/janitor, and seasonal. Brexit has not helped Gatwick in filling job vacancies for this sector. The Gatwick annual reports provide an insight to the efforts to reduce staff costs as in 2018 Gatwick reported a wage bill of full-time staff that was £41.9m, in 2019 Gatwick reported a wage bill of £201.2m, and in 2022 it has reduced further to £135.9m even with an extra 500 security staff being employed and wage increases.¹

Gatwick is reliant upon low cost airlines and European travel.

1

[REDACTED]

- 7.5. Global warming will, and has, impacted this leisure business model of European low-cost holidays as areas experience record temperatures. When considering the future baseline is a 1 in 100-year event of 38 degrees centigrade too low? We are seeing this being regularly exceeded in recent years. It is stated that Europe is heating at twice the rate of the rest of the world and yet this is not reflected in the proposals.
- 7.6. Low-cost airlines (nearly 90% the vast majority operated by EasyJet) to Europe may disappear as ticket prices have to reflect the alternative fuels (SAF mandatory by 2030 and 3-5x more expensive and hydrogen an unknown factor) and the damage flying is having on the planet.
8. Long-haul airlines historically move to Heathrow when slots become available. We do not see Gatwick attracting quality airlines that are sustainable, the most recent additions (such as Ethiopian Airlines and TAAG Angola) at Gatwick are using older aircraft that are generally noisier and dirtier, such as the Boeing 777. In 2019 Gatwick declared that 1 in 5 passengers were long-haul. Working on this basis that would make 15.2m long-haul passengers which would significantly increase freight and noise. Long-haul being a sector that will not be able to decarbonise in the foreseeable future due to the distance required to be flown and number of passengers carried as well as freight.

9. Other concerns and disingenuous nature of details provided by the applicant

Operations of the airfield

- 9.1. There is a lack of detail as to how the aerodrome/ runways will operate safely and there is a lack of detail on safeguarding in the application. Safety must be paramount as rapid taxiway/s will no longer exit onto the emergency runway. Our concerns arise from the complexity of the runway set-up, the fact that planes will have to cross the new runway to reach terminals, the expected queuing of planes on new taxiways held at complex traffic light systems to reach the main and new runways. The Examining Authority must question the safety of these plans, particularly in a context where there has recently been air traffic controller staff shortages at Gatwick causing flights to be cancelled or diverted. We question whether there will be sufficient staff to operate such a complex airfield and airspace. Lack of bunds to stop noise and emissions.

Change in Flight Paths

- 9.2. We have significant concerns about the impacts of the NRP on changes to flight paths and the harm this will cause to residents affected. Having assessed the current proposals, we are concerned that a sizeable proportion of residents will be subject to low flying long-haul planes across their airspace consistently and/or no respite periods from flightpaths overhead. We also believe that the complexity of two runways, traffic light system, and the desire to fly direct routes to Europe will lead to more go arounds and additional holding.

New Flight Paths

- 9.3. Gatwick Airport is seeking approval of Stage 2 of the CAA CAP1616 consultation process of the government's modernisation of airspace (Future Airspace Strategy Implementation South). FASIS seeks to make airspace more efficient and to transform airspace to allow for growth. CAGNE has seen mapping from Gatwick which makes clear they are already designing airspace for 2 runways before planning permission

has been granted. These maps show that Gatwick is, through the new designs, seeking to fly over new people. With such plans already in progress, Gatwick should be required to assess the full potential impacts of these new flight paths within the context of the NRP project and the DCO examination process.

Construction

- 9.4. We have a number of concerns related to the construction of the NRP, including the highways, air quality and noise impacts of construction traffic and the loss of biodiversity, hedgerows, trees and nature corridors to provide land for construction. We are also concerned about the impacts of light and noise pollution from construction works on protected species such as bats, and residents.

CARE incinerator

- 9.5. The incinerator (CARE) emissions, smell or vermin do not seem to have been given full consideration, nor the visual and light impact of a 50m tall stack. Moving the incinerator to the north of the runways, where there is a predominant westerly wind, will blow additional emissions towards the northern pollution zone.
- 9.6. More generally, we are concerned that this application inadequately considers the true impacts of the development on public health.

Misled

- 9.7. Gatwick Airport's application documentation has, in effect, been misleading by implying that the second runway already exists (for example, through the title presented to PINS and subsequently used by media and local authorities). Initially, Gatwick referred to the runway as a standby/ emergency runway (which was an accurate presentation). In 2021, it then changed to referring to this runway as the northern runway: 'bringing our northern runway into regular use'. This did not make clear to members of the public that considerable construction works would be necessary to enable the applicant to use both runways concurrently. To the extent that Gatwick's documentation implied that both runways could already be used together with little needed by way of construction works (and with the only real restriction being the legal agreement preventing dual use), that was fundamentally incorrect.

Stakeholders mapping

- 9.8. The letter issued by Gatwick Airport to the properties that may claim against the airport (Category 3 stakeholder map) has caused unnecessary anguish with residents.
- 9.9. The cost of over £4,000 for a hard copy of documents is disproportionate, as is the expectation that businesses and residents can read and understand 30,000 pages of jargon/reference. It is also not clear if spoken or braille versions are available (which should have been) and, as such, we believe there is a risk the applicant has discriminated. This process is simply unacceptable and appears to us to be biased in favour of the applicant.

Land use

- 9.10. We are concerned that Gatwick's noise expert (NDG /17 Steve Mitchell of Mitchel Environmental) indicates land will be required to be safeguarded for the new runway as was the case in 2015 with the now 3rd runway. Gatwick has not provided an explanation as to why land would need to be safeguard for this 2nd runway when they detail no new flight paths (CAP1908) and that it is 'existing'.
- 9.11. Land outside of Gatwick's boundary is to be purchased and used for taxiways. Little has been made of this in the application nor the safeguarding of land for a third runway (master plan 2018) as in the draft Crawley plan.

Lack of Onsite Facilities

- 9.12. We do not believe the airport is of a size to deal with the predicted number of passengers. At present, there are not enough toilets or seating areas to accommodate even the current levels of passengers at peak times. Gatwick should clarify its intention to build a 3rd terminal by removing the staff car park to the northwest of the airport.

Additional Issues Ignored

- 9.13. Sewage overflow, lack of funding for new sewage plant, and flooding are major concerns, as is the removal of biodiversity, green spaces, and the diverting of the River Mole through pipes; the River Mole leads sewage to the River Arun which is significant due to the [water neutrality](#) issues. In relation to the River Mole, there is a particular concern over flooding, given that the river and its tributaries have previously flooded, especially when the Airport and sewage treatment plans discharge water in extreme events (and there is a real risk that climate change will make such extreme events more frequent and severe). There is no overall biodiversity plan only pockets of detail in isolation. The time scale from the removal of nature to its replacements is far too great to ensure nature continues to flourish during the construction (2024 removal-2029/30 replanting).
- 9.14. We adopt the Sussex Wildlife Trust submission.
- 9.15. More generally, the Examining Authority must scrutinise the overall costs and benefits of the NPR to the whole of society. On 31st March 2019 Gatwick declared profits of £810.8m with 46.6m passengers.² The proposal now is for 101,000 extra flights (capped at 386,000) and growing to 76/80m passengers a year. This would estimate a profit return to Gatwick Airport of £1322m (£1.3bn) whereas New Economics Foundation state that Gatwick expansion will cost £9.1bn by 2050 to the planet.

10. Conclusion

- 10.1. For all the reasons given above, CAGNE objects to the NRP and respectfully requests that the Examining Authority recommends that the application is refused. Not only is the application not supported by policy (and in fact will undermine national policy), but it will also result in considerable disbenefits, including (but not limited to) harmful impacts on highways, air quality, noise and climate change. It is clear that these adverse impacts of the proposed development would greatly outweigh any of the alleged benefits.

