

Although I am chair of the community noise action group Gatwick Obviously Not, I am submitting this version in a personal capacity. GON will submit separately.

I strongly oppose Gatwick's proposals to turn their emergency runway into a full time one.

This representation focuses on the climate and noise aspects of Gatwick's proposals. However, I also oppose the application on other grounds including:

Gatwick has not put forward a policy compliant needs case for expansion. 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 would be met by the provision of a Northwest Runway at Heathrow. Gatwick has instead assumed that there will be no development at Heathrow.

The airport has substantial surplus passenger and air traffic movement capacity, above 2019 levels, without development of its standby runway. In my view there is no current or policy compliant need for development.

#### Baseline

I am not confident that the baseline Gatwick has assumed, particularly in respect of ATM and passenger volumes, is achievable. If baseline conditions are not achievable, environmental and noise effects of the project will be understated.

#### Climate impacts

Gatwick's proposals are incompatible with global and national climate change commitments and with the government's objective and policy for aviation emissions. They are also inconsistent with the CCC's advice that no airport expansions should proceed until a UK-wide capacity management framework is in place to assess and, if required, control sector CO2 emissions and non-CO2 effects.

The Government's objective is to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions. Gatwick's proposal would materially increase emissions and is therefore incompatible with the government's objective.

The ANPS states that an increase in carbon emissions that would have a material impact on the Government's ability to meet its carbon reduction targets would be a reason to refuse development consent. Gatwick's proposals clearly have the potential to have such a material impact.

Prior to mitigation CO2 emissions attributable to Gatwick in 2038 are forecast to be 2.5 million tonnes pa higher than in 2018, an increase of nearly 50%. Emissions attributable to Gatwick would grow from less than 1% of total UK emissions to over 5.5% of the CCC's recommended total UK emissions in 2038. An increase in emissions of this magnitude

would plainly be so significant that it would have a material impact on the UK's ability to meet its carbon reduction targets.

I recognise that some emissions mitigation may be possible. However, it is widely acknowledged that there are presently no proven measures by which emissions on the scale forecast by Gatwick could be mitigated and that the trajectory of the aviation industry to net zero emissions is unclear.

For these reasons Gatwick's assumption that the emissions reductions assumed in Jet Zero will be achieved is neither reasonable nor consistent with the precautionary principle and IEMA guidance.

IEMA guidance requires assessments to consider the certainty of mitigation proposals and whether they are realistic and achievable. Gatwick's mitigation assumptions do not meet these tests.

The illustrative scenarios in Jet Zero should therefore not be treated as a set of policies that can be relied on to reduce aviation emissions. Gatwick should instead have recognised the uncertainty and high risk in Jet Zero and modelled alternative scenarios.

Gatwick has also failed to quantify the non-CO2 effects of the project. These effects contribute twice as much as historical CO2 emissions from aviation. They should be modelled and presented for consideration.

In addition to the impacts of this proposal, the planning process should assess the scale and impacts of emissions from all proposed UK airport expansions against global and national targets and commitments.

## Noise

Gatwick's noise assessment is limited to people within the government's lowest observable adverse effect level (LOAEL) contours. This materially understates the impact of the proposal on communities. Gatwick should be required to prepare new analysis showing noise impacts using the limits recommended by the World Health Organisation and equivalent noise frequency measures.

## Noise envelope

The ANPS requires noise envelopes to be "defined in consultation with local communities". CAP 1129 states that "... it is essential that full agreement is achieved between all stakeholders on the envelope's criteria, limit values and means of implementation and enforcement".

Noise community groups repeatedly requested changes in Gatwick's Noise Envelope Group process to align it with CAA guidance and the ANPS. Amongst other things asked for were:

- the terms of reference to be changed to comply with CAP 1129

- the process to be independently chaired
- the timetable to be extended to allow issues to be explored in necessary detail
- independent technical advisory support to be provided.

Gatwick refused all these requests. Additional data and analysis that was essential to effective noise envelope engagement and which only Gatwick was able to provide was requested. This was also refused.

The absence of additional data and analysis precluded informed engagement on noise envelope metrics and limits and meant that GAL's process would not be able to generate policy-compliant outputs.

In summary Gatwick has not engaged on its noise envelope proposals in an appropriate, meaningful or policy compliant way and has failed to meet the policy requirements set out in the ANPS and CAP 1129.

Government policy states that "as a general principle, the Government therefore expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. This means that the industry must continue to reduce and mitigate noise as airport capacity grows."

Gatwick's noise envelope proposals do not achieve these policy principles. For the first noise envelope period the benefits of growth would accrue almost entirely to the industry, which would benefit from a 62% increase in passenger capacity while communities suffered substantial increases in noise.

For the second noise envelope period the actual noise impacts on communities would continue to be substantially greater than in 2019 once account was taken of the frequency of aircraft noise events, a key measure of community annoyance. Beyond the second noise envelope period, the proposed review process would allow noise to increase above the 2019 base year level.

Rather than the airport reducing noise as capacity grows, Gatwick's proposals envisage noise increasing very substantially and potentially indefinitely. And rather than the benefits of growth being shared between the industry and communities, Gatwick's proposals envisage benefits flowing almost entirely to the industry.

The APF also requires noise envelopes to give communities certainty about future levels of noise. Gatwick's proposals do not do so. They contain no proposals to limit noise in the winter period, allowing substantial growth in flights and noise for five months of each year. They also allow future noise envelope reviews to increase noise limits.

Policy additionally requires noise envelopes to incentivise airlines to introduce the quietest suitable aircraft as quickly as reasonably practicable. Gatwick's proposals assume a slow fleet transition to less noisy aircraft. This would remove any incentive for airlines to introduce quieter aircraft at Gatwick, and would be likely to motivate them to do so at other airports first.

New noise envelope proposals should comply with policy. Specifically, noise should reduce as capacity grows, at a pace that represents a genuine sharing of the benefits of growth between industry and communities. New proposals should cover all periods of the year and reflect a best-case fleet transition designed to incentivise airlines to introduce the quietest suitable aircraft quickly.

## Metrics

Gatwick's proposed noise envelope uses a single, average noise, metric, Leq. It is widely accepted that Leq does not portray aircraft noise as experienced by communities, and all relevant policy and guidance advises against its use as a sole metric.

The APF says "... we recommend that average noise contours should not be the only measure used when airports seek to explain how locations under flight paths are affected by aircraft noise. Instead the Government encourages airport operators to use alternative measures which better reflect how aircraft noise is experienced in different localities, developing these measures in consultation with their consultative committee and local communities. The objective should be to ensure a better understanding of noise impacts and to inform the development of targeted noise mitigation measures".

CAA guidance recommends using a "combination of parameters" and states that "where unilateral agreement cannot be achieved using standard metrics, consideration should be given to designing envelopes using other metrics provided that they are scientifically valid and robust".

The ANPS requires noise envelopes to be tailored to local priorities and to be defined in consultation with local communities. An envelope based solely on Leq metrics does not meet either of those tests.

I note Gatwick's assertion that use of Leq is supported by the CAA's 2014 Survey of Noise Attitudes, but do not believe the evidence supports that claim. ICCAN's stated that SoNA was not designed to consider the change in noise attitudes caused by an airport undergoing a period of volatility in its operation, such as expansion. ICAO is clear that exposure-response relationships are not applicable to assess the effects of a change in the noise climate, for instance where a new runway is opened and that common noise exposure variables (such as Leq) only account for about one third of community impacts. I believe SoNA provides no evidence that Leq is a reliable indicator of community impact over a period in which an airport is growing in the way Gatwick proposes.

Gatwick's proposal to report secondary metrics is irrelevant because no limits would be set for those metrics and they would impose no obligations on the airport.

Revised noise envelope proposals should include a suite of metrics and limits to be agreed with all stakeholders.

## Noise envelope reviews

Gatwick has proposed noise envelope review, compliance and breach arrangements that are wholly one sided and do not comply with policy. New review, compliance and breach arrangements should be developed and agreed.

#### Noise objective

I do not support the regulation 598 noise objective Gatwick has proposed because it selectively omits key elements of government policy. It should be amended to refer to and reflect all relevant government policy.

#### Night flights

The ANPS requires a ban on scheduled night flights between 11pm and 7am. In addition, outside the hours of a ban, the Government expects applicants to make particular efforts to incentivise the use of the quietest aircraft at night.

The ANPS is clearly stated to be an important and relevant consideration for applications for any airport nationally significant infrastructure project in the South East of England, not just Heathrow.

Gatwick has not proposed a ban on night flights or any other limitation on night flights. It has also not explained what efforts it would make to incentivise the use of the quietest aircraft at night outside the hours of a ban.

A ban on night flights and a comprehensive package of measures to incentivise the use of the quietest aircraft at night outside the hours of a ban should be conditions of any approval of the DCO.

#### Access

The existing train service is incapable of providing an efficient, reliable service with present demands. There is no way it can cope with the tens of thousands of extra customers a second runway would bring.

#### Conditions

There should be no expansion at Gatwick. However, if consent for the development was granted it should be conditional on a wide range of additional measures including:

A ban on all night flights for a full eight-hour period every night.

A noise envelope agreed with local communities which achieves the government's policy requirements that noise must be reduced and mitigated as capacity grows and the benefits of growth shared.

A enforceable, progressive and material reduction in the emissions and total climate impacts attributable to the airport from a 2019 baseline.

No increase in road traffic to the airport.

A legally binding commitment that there would be no further runway, terminal or associated development at Gatwick including no full new runway.