

1. The worst case for environmental impact of surface transport, noise, air pollution and climate change should be assessed:

- Increase from 40.9m in 2023 to 80.2m in 2047 is an increase of nearly around 39 million passengers per annum (mppa). Gatwick Airport Ltd (GAL) has compared environmental impacts against a future baseline of 67 mppa in 2047, just 1/3 of this increase.

- Environmental Assessment guidance is that assessment should be against the realistic worse case. This has not been done.

- The modelling, scenarios and actual impacts should be compared to the current situation and future case without any increase in flights or passengers so the full impact of Gatwick expansion is seen.

2. Future environmental and local impacts should be no worse than now:

- GAL should model transport scenarios with no car growth and no worse crowding on rail network (noting luggage space too). This would mean new train services to/from airport and potentially between London and the South Coast elsewhere.

- Local traffic congestion and parking impacts in and around Gatwick should not be worse.

- As well as traffic there should be no increased impacts on air pollution, noise, flood impact, water neutrality.

3. The DCO has highlighted that in some areas existing impacts are already unacceptable. These impacts should be accepted as such and reduced and/or eliminated:

- No night flights

- Stronger noise limits and mitigation scheme.

- Address existing poor quality of River Mole, including Gatwick Airport's potential contribution to sewage overflow incidents and downstream flooding.

4. Gatwick must take seriously its responsibilities in these areas by agreeing conditions to limit all these impacts - as part of a new Section 106 agreement, regardless of whether the airport is expanded or not.

- This should limit local road congestion and ensure surface transport modal shift, public and active transport investment, stronger curbs on noise, ban on night flights, air pollution measures, climate impact limits, including from flights.

5. Climate change is a significant impact, and should be addressed.

- Gatwick must take responsibility for the emissions of flights from the airport in considering both its current and proposed future climate impact.

- Increasing Gatwick to the size of Heathrow, would make it as big as the UK's single largest climate polluter. GAL's claim that climate impact is not significant is simply not true.

- There is a climate emergency. Aviation must play its part in reducing carbon emissions. This must include constraining demand at the airport level or efficiency savings and tax breaks will continue to drive growth. The airport's expansion should not be supported on climate grounds alone.