



11 March 2024

Gatwick Northern Runway Project Consultation

Interested Party Reference Number: 20042926

We write as **Lewes District Green Party** to *strongly oppose the expansion of Gatwick Airport via the Northern Runway Project*, on **environmental, social, and economic** grounds.

We number 360 local members residing in Lewes District, which is 30 miles from Gatwick. Our diverse membership includes economists, planning consultants, and contributors to international Intergovernmental Panel on Climate Change (IPCC) reports. Collectively, we have significant environmental, social, and economic expertise and experience that has fed into our response.

Furthermore, we represent local residents on multiple local authorities, including **Lewes District Council (LDC)** (17 Green Councillors), **Lewes Town Council** (12 Green Councillors), **Seaford Town Council** (2 Green Councillors), and multiple Parish Councils.

Our considered view is that *the proposed development contradicts local and national policy in the following important areas*. These concerns are unlikely to be satisfactorily and feasibly addressed by any potential mitigations.

Climate change

The Government's advisory body for climate change, the Climate Change Committee (CCC), stated, as a *priority*, in their Progress Report, June 2023:

R2023-037: *"No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector GHG emissions and non-CO2 effects. A framework should be developed by DfT in cooperation with the Welsh, Scottish and Northern Irish Governments over the next 12 months and should be operational by the end of 2024. After a framework is developed, there should be no net airport expansion unless the carbon-intensity of aviation is outperforming the Government's emissions reduction pathway and can accommodate the additional demand"*.

This recommendation was echoed by the Environmental Audit Committee (EAC) 'Net zero and the UK aviation sector - Third Report of Session 2023–24':

"We recommend that the Government sustain and enhance its engagement with the aviation industry on the delivery of operational efficiencies from current and future fleets of aircraft operating through the UK, to maintain the ambition to secure 2% year-on-year CO2 emissions reductions from fuel and operational efficiencies. The delivery of these reductions must be rigorously monitored against an established baseline: should the rate of progress in reductions fall behind 2%, the potential contribution of system efficiencies to meeting the 2050 net zero target must be urgently reassessed".

Given that the Government has chosen to ignore both these recommendations, and that neither the capacity management framework proposed by the CCC nor the rigorous monitoring of reductions 'against an established baseline' proposed by the EAC are in place, it is clear to us that the proposed expansion of Gatwick Airport will inevitably be incompatible with the legal requirement (passed into law in 2019) to attain net zero emissions by 2050.

The Aviation Environment Federation (AEF) points out on its website at 'Challenging Airport Expansion' that contrary to the CCC's advice "*the Government's 'Jet Zero Strategy One Year On' published in the summer 2023, forecasts passenger increases of 52% above 2018 levels, more than twice the 25% growth allowed for in the Climate Change Committee's net zero modeling*". We agree with the AEF's view that "*this is a high-risk strategy that puts emissions targets at risk.*"

It is also clear that the mitigations suggested by the airline industry to offset emissions and/or to rely on future Negative Emissions Technologies (NETs) are, unfortunately, wishful thinking. Offsetting has so far failed to adequately compensate for emissions, and NETs are not yet available to be deployed either at the scale required, or within the necessary timeline. Unfortunately, unlike the bold claims of airlines, 'flying green' does not (yet) exist.

Carbon Market Watch (CMW) believes that as the heat is being turned up on the planet it should be redirected towards the aviation industry. CMW is pushing for tighter regulation of misleading airline advertising, for greater transparency over the use of carbon credits and other voluntary climate action undertaken by airlines, and for the 'polluter pays' principle to apply. Daniele Rao, a CMW expert on Decarbonisation of Aviation says:

"Customers are sold exaggerated claims that when they choose to fly, their end destination is a planet with a stable climate future, but as we are experiencing this summer, we are all passengers on a one-way journey to a dangerously hot future, crash landing into one climate emergency after another. The onus is on airlines to be serious in addressing their climate impact and to be honest to consumers about the true damage flying inflicts on the planet."

We agree.

As Lord Deben, Chair of the Climate Change Committee, summed up in his 'Progress Report' letter to the Prime Minister in June 2023 "*Our children will not forgive us if we leave them a world of withering heat and devastating storms where sea level rises and extreme temperatures force millions to move because their countries are no longer habitable. None of us can avoid our responsibility. Delay is not an option.*"

We fully endorse Lord Deben's eloquent summation and believe that the Northern Runway Project would be an egregious and deliberate disregarding of the UK's national legal commitments on climate change.

Air pollution

Gatwick Airport currently continues to breach air quality limits of NOx. Research has shown that peak landing and take-off times produce peak distribution of particles. With a second runway in operation, Gatwick proposes to introduce more flights *throughout the daily period*, thus peak distribution of particles will inevitably increase exponentially.

According to the 'Campaign Against Gatwick Noise and Emissions' (CAGNE)'s updated '*What about our Air Quality?*' report, it is anticipated that '*the concentration of particles with a 2-runway airport would increase by 63% to 153,220 particles/cm³ throughout the day*' (Imperial College research study). There would, of course, be further increases caused by service vehicles, airside vehicles, taxiing, and passengers accessing the new Gatwick rail station.

Gatwick has stated that it will '*work with*' local authorities to monitor and mitigate air quality, but no details are provided about how this would be undertaken. Furthermore, Gatwick Airport is not interested in addressing the additional, further decline in air quality, due to the inevitable increase in vehicle traffic to and from the airport and its newly-built amenities. Nor does it appear to take into account the concentration of particles, especially the ultrafine particles, which will inevitably result from the *construction*, as well as the operation, of the new runway.

Noise pollution

Many residents represented by LDC councilors live directly under Gatwick flight paths (e.g. the rural village of Ringmer). The increased air traffic and thereby noise pollution arising from the additional runway would be unacceptable to residents. There are well-known detrimental impacts on human health and wellbeing (e.g. sleep quality) from the stress of noise pollution.

An expanded and altered noise monitoring and insulation program would need to be rolled out, each one funded by the airport in perpetuity, with results being made publicly available, and noise monitoring locations would need to be expanded.

We strongly object to '*mean noise*' being used as an appropriate measure. Currently, noise peaks occur around every 3 minutes. These would occur far more frequently with 2 runways in

operation. The impact of *repeated peaks* on our residents' health and mental wellbeing is already significant and noise pollution from additional flights would only make this worse. At the least, we would require full adherence to the 2014 offer of 'no night flights' between the hours of 23.30 and 6.30.

Surface transport

East Sussex County Council (ESCC) has cited multiple points of concern in relation to surface transport in their 'Relevant Representation' (26.10.2023) to the Planning Inspectorate and we, being within the ESCC boundary, find these are relevant to us. They include the need for Gatwick Airport to address proper delivery of necessary supporting travel infrastructure *in advance* of the northern runway being in full operation.

Also, that in the 'Mode Share Commitments' (set out in the Surface Access Commitments) there are not sufficiently ambitious *mitigation proposals*, especially for passenger travel, to encourage a substantial modal shift towards sustainable travel to and from an expanded airport, i.e. bus priority measures to deliver journey time savings.

Above all

We note that on 28 July 2022, the United Nations General Assembly declared that everyone on the planet has a right to a healthy environment, endorsing Human Rights Council resolution 48/13 which unequivocally recognises the *human right* to a clean, healthy and sustainable environment for all people. The UN High Commissioner for Human Rights has placed the triple planetary crisis of nature loss, pollution and climate change at the top of the human rights challenges of our era. Failure to rise to this challenge is not an option. Denial is not an option. Delay is not an option. The latest reports of the Intergovernmental Panel on Climate Change make it clear that these pathways lead to catastrophe.

Yours sincerely

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Co-Chair, Lewes District Green Party

On behalf of 360 members,
and 31 Green Councillors representing local residents