

**Written Submission to the Planning Inspectorate from Claudia Fisher
12 March 2024**

I am a Green Councillor for Horsham District Council (HDC) representing Storrington & Washington ward and a Parham Parish Councillor.

I strongly object to the proposed expansion of Gatwick (GAL) via the development of a new Northern Runway for many reasons, climate change, green house gas emissions, water environment (sewage, flooding, water over abstraction, water quality), impact on traffic, impact on air quality (from road transport and increased aircraft fuel pollution), noise, night flights, ecology, biodiversity, house pricing for local people in Horsham during the 15 year construction period - the list goes on and on. I also need to express my dismay at the lack of detail and quite frankly courtesy shown by the Applicant, which has failed to include or even to address many issues it should have done in its long but sadly lacking application.

As an HDC councillor I was privileged to have been shown a draft of the West Sussex Local Authorities Local Impact Report and given the opportunity to comment in advance of finalisation. I fully endorse all the points raised in the WS Authorities LIR and I was shocked to discover that basic pieces of information have not been supplied by the Applicant and significant areas of under-reporting by the Applicant also.

Here are several areas of concern to me, namely:

1. The Applicant's consistent lack of detail and often incomplete, incorrect and/or missing climate, ecology, environment and transport plans.
2. Biodiversity, Ecology and Arboriculture - the Applicant has failed to specify area size so it is impossible to accurately assess the impact of the construction period.
3. The Applicant has given no assurances that the GAL Biodiversity Action Plan (BAP) will definitely continue.
4. Removing trees from Ancient Woodland. This should not be permitted, and more details needs to be supplied.
5. The Applicant needs to ensure that newly created habitats are monitored and reported to the Local Authorities for a 30-year period minimum.
6. Horsham District Council declared an Climate and Ecological Emergency in June 23 and agreed a Climate Action Plan in January 24 - expansion of Gatwick is directly in contradiction of these HDC policies.
7. The Applicant has not followed agreed methodology and omitted too include Well to Tank (WTT) emissions during the construction period leading to significant under-reporting - this must be corrected and re-assessed as part of the DCO process.
8. The Applicant appears to have excluded emissions sources such as maintenance, repair, and replacement during the operational life cycle stage of the Project, with no justification. This must be corrected and re-assessed as part of the DCO process.

9. The Applicant appears not to have applied the WTT to aviation emissions during the operation of the scheme either. This must be corrected and re-assessed as part of the DCO process.
10. These omissions, inconsistencies and failures to adhere to globally recognised GHG Protocol Corporate Accounting Standard means the Applicant has under-reported aviation emissions by around 20% - which means roughly 1MtCO₂e being entirely unaccounted for EVERY YEAR throughout the construction period and led to possible omissions, inconsistencies and failures in the aviation emissions stated during the operation period also. This must be corrected and re-assessed as part of the DCO process.
11. A failure from the Applicant to accurately assess worst case for environmental impact of surface transport, noise, air pollution and climate change bearing in mind the increase from 40.9 million passengers per annum (mppa) (2023 figures) to 80.2mppa in 2047 while 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 worst 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 and future environmental and local impacts should be no worse than now.
12. The Applicant should model transport scenarios with no car growth and no worse crowding on the rail network (noting luggage space too). This would mean new train services to/from the airport and potentially between London and the South Coast elsewhere - which are not feasible. Local traffic congestion and parking impacts in and around Gatwick should not be worse.
13. The Applicant has two highway solutions and model a 33% increase in cars which will clearly be unacceptable in terms of increased traffic, air pollution and CO₂ emissions - why has it not even considered increasing investment in coach and rail travel?
14. As well as traffic there should be no increased impacts on air pollution, noise, flood impact, water neutrality.
15. 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.
16. There should be no night flights, stronger noise limits and a mitigation scheme. The ExA needs to make sure these requirements are included in any consent conditions.
17. The Applicant needs to address existing poor quality of River Mole, including Gatwick Airport's potential contribution to sewage overflow incidents and downstream flooding.
18. The Applicant 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. In particular there should be examination of the concerning research of Georgia Gamble PhD student at Imperial College, London as can be viewed on a

YouTube video titled 'Cohort 2 Presentation Annual Conference 2023 - Georgia Gamble' around the worryingly high levels (currently unmonitored) of toxic volatile particulate matter.

19. Climate change is a significant impact and should be addressed as part of the DCO process. The Applicant 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.
20. 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. If consent is granted there should be a binding cap on aviation CO2 emissions.
21. Outdated national aviation policy - the Secretary of State should accept that the Aviation National Policy Statement (ANPS, 2018) and Making Better Use of Existing Runways policy (2018) is now out-of-date, specifically with respect to climate change. This should be updated before a decision is made by the Secretary of State.
22. Impacts on over-abstraction in the Sussex North Water Zone need to be addressed by the Applicant - water knows no boundaries. Can the Applicant give legal guarantees in perpetuity that no water shall be extracted from the Hardham site or anywhere within the Sussex North Water Zone? The ExA needs to be forensic in its examination of this vital aspect to ensure that irreplaceable habitats are not endangered by this project.

I sincerely hope that these 22 concerns are taken into consideration in the planning process and that the Applicant is held to account for their failings to supply necessary information and solutions.

Claudia Fisher