

Written Submission to the Planning Inspectorate from Ben Benatt 12 March 2024

I am a Chartered Environmental Scientist and Full Member of the Chartered Institute of Ecology and Environmental Management. I work as a professional biodiversity specialist, and have over 30 years of experience working on large scale development projects across the south of England. Besides this in my own time I am a keen local Sussex natural historian and long term supporter of many local conservation groups.

I strongly object to the proposed expansion of Gatwick (GAL) via the development of a new Northern Runway for very many reasons. Foremost among these is that, however the figures are presented, common sense alone will make clear that this development (and indeed any significant expansion of a major airport) directly contradicts any intention to reduce emissions of greenhouse gases. There is a climate emergency, and 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 be rejected on climate grounds alone. If consent is granted there should be a binding cap on aviation CO2 emissions.

The proposed development will necessarily pose a significant threat to the Government's chances of meeting legally binding targets set under the Paris Agreement 2015. In addition to this Horsham District Council declared a 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.

Flying comes close to the definition of being rich today. There are fifty-six countries in the world with annual per capita emissions lower than the emissions from one individual flying once between London and New York. These figures work on conservative estimates of the impact of aviation. Even in such a flying-prone country as England, 1 per cent of residents took a fifth of all overseas flights in 2018; 10 per cent took half and 48 per cent none.

I contend that current national aviation policy is outdated (Aviation National Policy Statement (ANPS, 2018) and Making Better Use of Existing Runways policy (2018)) is out-of-date, specifically with respect to climate change. This should be updated before a decision is made by the Secretary of State.

Climate change is a significant impact and should be addressed fully 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.

Additional points in relation to climate impacts are as follows:

- Environmental Assessment guidance states that assessment should be against the realistic worst case. This has not been done - i.e. an increase from 40.9m passengers 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. 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.
- 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.
- The Applicant appears not to have applied the Well To Tank to aviation emissions during the operation of the scheme either. This must be corrected and reassessed as part of the DCO process.
- 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.

My other main concerns include:

1. Noise, air quality, surface travel and other impacts to the local environment

• 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 through the following measures:

- o No night flights
- o Stronger noise limits and mitigation scheme.
- o Address existing poor quality of River Mole, including Gatwick Airport's potential contribution to sewage overflow incidents and downstream flooding.

Future environmental and local impacts should certainly 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.

• 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.

• 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?

• 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.

• 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.

• There should be examination of the concerning research undertaken by Georgia Gamble for her PhD thesis at Imperial

College, London as can be viewed on a 3 YouTube video titled 'Cohort 2 Presentation Annual Conference 2023 - Georgia Gamble' around the worryingly high levels (currently unmonitored) of toxic volatile particulate matter down-wind of Gatwick airport currently, as this situation would significantly worsen if the proposal goes ahead.

2. Water environment impacts

- The Applicant needs to address existing poor quality of River Mole, including Gatwick Airport's potential contribution to sewage overflow incidents and downstream flooding.
- Impacts on over-abstraction in the Sussex North Water Zone need to be addressed by the Applicant. 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 aquatic and water-dependent habitats are not endangered by this project.

3. Biodiversity impacts:

- 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.
- The Applicant has given no assurances that the GAL Biodiversity Action Plan (BAP) will definitely continue.
- Removing trees from Ancient Woodland. This should not be permitted, and more details needs to be supplied.
- The Applicant needs to ensure that newly created habitats are monitored and reported to the Local Authorities for a 30-year period minimum.

Overall I am appalled by the Applicant's consistent lack of detail and often incomplete, incorrect and/or missing climate, ecology, environment and transport plans.

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. Please make sure that all of my concerns are looked into fully.