

Gatwick airport expansion

I am an East Sussex County councillor representing the Forest Row and Groombridge division, near East Grinstead and in the path of many Gatwick flights. I am making these comments on behalf of the five Green Party Councillors on the East Sussex County Council (the Green Group).

We have several objections to the proposal for expanding Gatwick as follows:

- There are no scenarios where an increase in air travel is consistent with the UK climate targets over the next 30 years; and the carbon emissions in the proposal are not calculated correctly or in line with government guidelines.
- The baseline air transport figures that impacts are measured from are not the present-day figures, but some projected figures in the future. To see the actual impact from today to the proposed future, the impacts all need to be measured from today.
- The transport solutions for getting to and from the airport are too car focused and not enough effort has been put into incentivising public transport use and disincentivising car use.
- There is not enough attention given to the road issues beyond Gatwick – especially the A22 and the A264, which both run through villages and are major roads for accessing the East Grinstead and Crawley area from East Sussex.
- The ecological, air quality, water quality and other impact on the Ashdown Forest, local rivers, local nature and wildlife, has not been fully considered.
- The current negative ecological and climate impacts need to be addressed also, and this is not taken into account.

Here are some more details:

1. The application should assess the worst-case scenario for environmental impact of surface transport, noise, air pollution and climate change.

The number of passengers is projected to increase from 40.9m in 2023 to 80.2m in 2047, which is an increase of around 39 million passengers per annum (mppa). Gatwick Airport Ltd (GAL) has compared environmental impacts of the proposal against a future projected baseline of 67 mppa (in the do nothing scenario) in 2047. So they are calculating an increase of just 13.2 mppa just 1/3 of the actual increase.

- The Environmental Assessment guidance indicates that the assessment should be made against the realistic worse case. This has not been done. (The Traffic & Transport Chapter of the Environment Statement has been undertaken in accordance with rescinded guidance by IEMA: Guidelines for Environmental Impact Assessment of Road Traffic (1993). This was replaced in July 2023 by Environmental Assessment of Traffic and Movement. Therefore, if there are future updates to the Environmental Statement, this should be reviewed against the latest guidance and amended. as necessary.)

- 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 and growth is seen.

2. More emphasis is needed on an increase in public transport use and disincentivising the use of cars. Rail capacity needs to be increased, better bus services locally, with an emphasis on building up bus services in neglected rural areas – A22, Crowborough, Uckfield and Heathfield.

3. Future environmental and local impacts should be no worse than now – especially for land transport considerations.

- 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 – so modelling on how to achieve that and what it would look like is required.
- As well as traffic there should be no increased impacts on air pollution, noise, flood impact, water neutrality. This has not been shown.
- ESCC requires measures that reduce traffic through sensitive locations near and through Ashdown Forest Special Area of Conservation (SAC) / Special Protection Area (SPA) and along the A22. There is a concern about the project's impacts on additional car journeys to the airport via Ashdown Forest which is an area of European Ecological Importance, SAC, and a Site of Special Scientific Interest (SSSI). As a consequence, there is a need for GAL to consider these impacts in respect of air quality and nitrogen deposition issues as part of their modelling work.

4. 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. In particular the proposal should commit to:

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

5. 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.
- GAL needs to mitigate the impacts of the approaching traffic from the surrounding road network, including routes in East Sussex such as the A22 and A264, which feed into the A23/M23 corridor. GAL must also assess the impacts of airport growth on the strategic road network (e.g. M25) and ESCC's highway network beyond the immediate environment of the airport.

6. 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. On climate grounds alone the airport's expansion is unjustifiable.

7. The environmental statement does not calculate well-to-tank emissions (WtT), which is noncompliant with the globally recognised GHG Protocol Corporate Accounting Standard and goes against the UK Government's carbon accounting methodology (BEIS, 2022). Using WtT emissions methodology would raise GHG emissions associated with aviation by approximately 20.77%.

- o It is not clear if a conversion was undertaken from CO₂ to CO₂e for aviation emissions, which would result in a 0.91% increase in all aviation emissions (BEIS, 2023). This needs to be clarified.
- o Further clarity is required on whether embodied carbon from construction materials has been considered in the assessment.

8. Use of offsets and off-site renewable generation, including the following three points.
- o The Environmental statement suggests reliance upon Renewable Energy Guarantees of Origin (REGO) certificates to achieve net zero emissions. REGOs do not guarantee that additional renewable generation will be brought online to match demand. Guidance in the UK Government's Streamlined Energy and Carbon Reporting (SECR) should be followed to accurately report emissions from electricity consumption.
 - o The Environmental Statement describes use of carbon offsets. Various risks have been identified by the scientific community around offsetting schemes. GAL should specifically state which offset scheme they intend to use so research can be conducted into the robustness of the scheme.
 - o The Environmental Statement assumes that the Government's Jet Zero Strategy will ensure aircraft emissions remain compatible with the UK's net-zero targets. Recent developments call this assumption into question, most notably advice from the Climate Change Committee in their 6th Budget Report. Further sensitivity analysis should be undertaken, exploring scenarios where uptake of Sustainable Aviation Fuels and electric aviation take place at slower rates or, in the latter case, fail to achieve commercial uptake.

9. Human and animal wellbeing need to be considered more carefully. Clarification is required on how the proposal aligns with dark skies policy Outlined in local protected landscape strategies e.g. High Weald, South Downs National Park. The noise and vibration impacts on health and well-being of local communities and wildlife need further consideration and appropriate mitigation measures need to be identified. There is a need to consider vulnerable groups and species within this, that may be more affected by the impacts of noise (and vibrations). A Health Impact Assessment should outline population health impacts for East Sussex and appropriate mitigations proposed and provided to protect human and animal population health and any impact on local services and infrastructure.