Interested Party Reference number: 20045900

Gatwick Airport Northern Runway Project – Development Consent Order (DCO)

Summary of Written Representations for Deadline 12th March

Gatwick Area Conservation Campaign (GACC)

12th March 2024

Dear Examining Authority

Please find our summary of written submissions for the 12th March deadline..

Yours faithfully,

Peter Barclay

Chair, Gatwick Area Conservation Campaign

GACC
GATWICK AREA CONSERVATION CAMPAIGN

Summary Document

Section 1. Overall Summary

1. **Assess worse case for environmental impact of surface transport, noise, air pollution and climate change.**
   - Increase from 40.9m in 2023 to 80.2m in 2047 is an increase of around 39 million passengers per annum (mppa). Gatwick Airport Ltd (GAL) has compared environmental impacts against a future baseline of 67.2 mppa in 2047, just 1/3 of the increase from 2023.
   - 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 define and 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 has not taken seriously its impact on the environment and must sign a new Section 106 agreement, agreeing conditions to limit all these impacts,** 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.

6. **Comments on second round in hearings.**
   - The Open Floor Hearing is proposed on Thursday 2nd May. Should an election be called on that day, and in any case should be shifted as it clashes with local and mayoral elections.
   - The duration for ISH7 on May 1st 2024 may not be sufficient to cover all environmental issues. It is assumed this would be separate from time to follow up on issues covered already (e.g. transport, noise)
   - There should be time for follow-up Issue Specific Hearings on the topics covered from 29th February to 6th March.

7. **Dated 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 the Secretary of State makes the decision.

Section 2. The Case for Development, Economic Assessment and Need

1. GACC challenges the economic assessment made by GAL. This submission includes concerns raised by New Economics Foundation in their relevant representation. GACC believe that the economic benefits are overstated by the applicant, and the economic and environmental downsides are understated. When the relevant scheme costs, benefits, their balance of equity, and the long-term societal risks are taken into account, the scheme's overall balance is negative and entails unreasonable levels of risk to local, national and international wellbeing. Many of the arguments set out here are supported by evidence set out in NEF's recent report titled *Losing Altitude: The Economics of Air Transport in Great Britain*.

2. The ANPS (Airports National Policy Statement, 2018) requires airports seeking to expand (other than Heathrow) to demonstrate sufficient need, additional to (or different from) that met by provision of the Northwest Runway at *Heathrow*. Gatwick has not done this.

3. Gatwick should also provide the data and assessment to justify the need for increased use of its existing runway above 2019 levels, without development of the Northern runway. This should be contrasted with historic growth rates of flights and passengers (including allowance for Covid impacts), global economic trends, increasing awareness and need for legislation to limit aviation's climate impacts and changes in how international business operates. It is unlikely that any additional capacity or the Northern Runway will ever be needed.

4. The future baseline currently used for comparison in the DCO itself represents a massive increase in flights and passengers. GACC are not yet confident that Gatwick's future baseline air traffic movements and passenger volumes are achievable, or whether they are supported by sufficient physical infrastructure in the 'without project' (future baseline) case. All assessments, including the EIA, should assess the aggregate impacts associated with both increased use of the existing runway *and* those associated with the

Northern Runway, so the overall impacts of Gatwick's planned growth can be clearly understood against the current level of flights and passengers using the airport.

Questions raised in Issue Specific Hearings

5. Please can GAL provide evidence of the rates of recovery for each year since Covid for leisure and business travel components of Gatwick's pre-Covid passenger mix and indicate precisely when they current predict business travel to return to pre-Covid levels.

6. Please may GAL provide details of the current, future baseline and proposed future project square metres of terminal capacity at Gatwick Airport.

7. Please can GAL confirm how the amount of terminal capacity, piers, stands and other surface infrastructure is sufficient so as to not constrain the predicted 'future baseline' of 67 mppa and project level passenger predictions of 80 mppa. In this regard please provide comparison of what a 'busy day' would entail in the future baseline (2047, 67 mppa) and project (2047, 80 mppa) cases would be and in each case what % increase in different aspects of surface infrastructure (not least terminals, piers and stands) would be required. Please support this with references to other projects.

Section 3. Terminal and Land Requirements (and associated environmental assessment)

1. GACC would therefore request that GAL explain how they can accommodate such growth in passenger numbers at Gatwick with the terminal, pier and stand capacities set out in this DCO application. If Gatwick actually intend to construct a new terminal, as the existing terminals appear to be inadequate to support the proposed increase in passenger throughput, then this should be included as part of this application. Not including it at this stage risks masking the overall land-take required for the development, such as through shifting buildings and infrastructure that is currently within the red line that denotes the extent of this development beyond this boundary. The ecological and other impacts of wider development, *should they be needed as a direct consequence of this development,* should be able to be assessed so the worse case impact to the surrounding area is understood through this DCO examination.

2. GAL are still seeking to safeguard land for what they describe as a future second runway to the South of the airport. The GAL 2019 Masterplan notes that this would increase passenger numbers to 95 mppa. GAL should confirm whether this envisaged capacity is still correct. GACC contend that this safeguarding should be specifically struck out of consideration as part of this DCO, before the existing scheme is permitted. This should be explicated excluded from the Section 106 agreement.

3. GACC request that GAL confirm what additional buildings, and infrastructure, and such land requirements would be required to increase the airport to a capacity of 386,000 ATMs and 80.2 million passengers each year, and how this is reflected in their environmental statement.

4. GACC would like GAL to confirm the ecological impact has been assessed for the land proposed to be used as construction sites for the project, inclusive of access routes, including both Riverside Garden Park and use of the land to the north of the South Terminal Roundabout.

Section 4. Overall Environment Assessment

1. GAL should demonstrate that sufficient surface infrastructure (e.g. terminals, stands, piers, car parking, hotels, offices) have been provided to fully accommodate the level of growth set out in both the future baseline, and the project case.

2. GACC is concerned that an over-optimistic estimate of what the without project 'future baseline' is could lead to the increased flights and passengers associated with the project to be understated. However, the environmental impact should (as highlighted by questions from the ExA in ISH4) be measured against the current extent of environmental impacts to the full as project case.

3. Referencing the Horse Hill Supreme Court case[1], GACC contend that the environmental impact assessment should consider the impact of enabling flights just as drilling for oil must consider the impact of its downstream emissions: burning oil.[2] This should be reflected in the Section 106 Agreement and applied to all areas where the project has environmental affects that should be controlled.

4. GACC would like to reiterate the comments made to pre-examination hearing regarding sufficiency of data sets and information shared by GAL to enable full examination of the DCO application. GACC contend that so far Insufficient detail has been provided by GAL and that this lack of sharing of what underpins their submission, risks putting the overall effectiveness of the DCO examination in to jeopardy.

Section 5. Ecology

1. GAL should provide a full schedule setting out the type and total area of habitat that would be lost, and the subsequent mitigation and compensation, for each of these habitats in turn.

2. GACC shares Sussex Wildlife Trust's concern that there is currently a lack of a landscape-scale approach to assessing impacts. GAL set out how they have assessed the biodiversity impacts of the time lag between habitat loss and subsequent habitat creation and maturity, particularly with respect to woodland. GAL to set out how Biodiversity Net Gain (BNG) is to be delivered, such as to ensure it is separate from and additional to requirements under the mitigation hierarchy. GAL should provide full details to ensure appropriate monitoring and management of newly created habitats. GAL should provide details of the alternative site assessment for consideration of the

[1] Pending, https://www.supremecourt.uk/cases/uksc-2022-0064.html
[2] To quote the appellant in the Horse Hill case: "Planning authorities say that they don't need to consider the climate impacts of the actual burning of the oil - just from the drilling. It's like saying a chocolate cake is low calorie as long as you don't eat it."

alternative ecological sites to offset the sites that would be lost as a result of this project.

3. The assessment of ecological impact of increased flood risk (including due to Thames Water sewage works outfalls in the River Mole and tributaries) and the impact on water resource neutrality of the additional water extraction proposed for this project should be fully assessed. GAL request that the Phase 1 Habitat Survey be extended to cover the extent of the River Mole and other watercourses whose ecology is impacted by this major development, so the full impact is understood and can be mitigated.

Section 6. Surface Transport

1. Gatwick Airport Limited (GAL) surface transport proposals suggest low commitment to sustainable travel, with weak sustainable travel targets leading to an increase in car traffic. The proposals will lead to increased highway travel times and increased crowding on busy mainline rail services.

2. The proposals from Gatwick Airport need to be honest in that they are adding highway transport capacity, which could encourage car use in travel to/from the airport. Additional highway capacity can provide, at best, a short-term benefit in reducing congestion and improving journey times, but the benefit will erode, as new or more traffic is attracted by the extra capacity which gradually fills until rising congestion again acts as a deterrent.[3] The net effect is more traffic on the roads, and precisely the opposite of the transport response required to tackle the climate emergency and other environmental targets (including through a modal shift to walking and cycling, buses and trains).

3. GACC's view is that the DCO is incorrect to have responded to National Highways to increase road transport capacity (reducing congestion and therefore incentivising car travel both for airport and non-airport related journeys) whilst ignoring completely calls for increased public transport modal share from that set out in the GAL 2021 consultation and completely ignoring calls for increased investment in greater public transport capacity (principally rail, but also bus and coach). Instead the GAL 2022 consultation and subsequent DCO have watered down the public transport modal shift targets, and failed to back up even this poorer ambition with meaningful investment proposals. Overall this will lead to increased surface transport carbon emissions.

Additional Points Arising from Issue Specific Hearing 4

4. It is unclear why GAL has produced this particular transport plan. What objectives were GAL trying to meet, what ranges of alternative transport plans were tested and what criteria were used to assess the alternatives? Was a no car growth scenario examined and tested and, if so, why was it rejected? If not, why was this not considered, with expenditure directed to improve rail and bus/coach access rather to expand overall highway capacity?

[3] For example, see https://www.nber.org/papers/w15376 and https://citymonitor.ai/transport/does-building-more-roads-create-more-traffic-934.

5. Why has GAL chosen mode share targets that allow car growth, and a parking strategy that includes additional car parking spaces? Why has GAL put forward a transport strategy that includes major highway changes that increase highway capacity and also has increased the supply of car parking? Would a lower car growth strategy remove the need for the major highway works included with the project and release funding that could then be applied to improved sustainable transport measures?

6. Network Rail noted that Gatwick rail station capacity improvements were designed to accommodate demand up to 2036 and did not include the additional passengers associated with the Northern Runway Project. This throws doubt on the ability of Gatwick station to accommodate the levels of demand resulting from the project. What operational strategies would be implemented on occasions when the station became overcrowded and what impact would these have on train services?

Section 7. Climate Change

1. The submission by GAL understates the increased carbon emissions associated with the proposed expansion of Gatwick Airport, and underplays their significance. This DCO would clearly have a material impact of the ability of the UK to meet its carbon reduction targets, and future carbon budgets. If expansion were permitted Gatwick alone would be responsible for over 3-5% of the UK's sixth carbon budget, with or without Jet Zero mitigations. Approval would require government to ignore the Climate Change Committee's 2023 Progress Review recommendation to not permit any airport expansion without a UK-wide capacity-management framework being in place.

2. Planning must consider significance of emissions from all airport expansions not just on a case-by-case basis. Significance should be assessed against the 1.5°C compliance trajectory as in Institute of Environmental Management and Assessment (IEMA) guidance (Assessing GHG emissions and their significance, 2022).

3. GAL should be required to assess the cumulative impact of its plans against the internationally accepted 1.5°C limit on global temperature increase and the UK government's legal requirement to limit greenhouse emissions to net zero by 2050. Gatwick Airport needs to explain how expanding one of the hardest to decarbonise sectors of the economy is consistent with the radical decarbonisation that is required across all sectors of the UK economy to meet the net zero target.

4. GAL must explain why it believes it is acceptable to expand to 80 mppa, which is inconsistent with the Aviation Strategy: Making Best Use of Existing Runways (2018). It is not acceptable to simply assume later Jet Zero reductions can be achieved within climate limits.

5. GAL's submission should include all of the greenhouse gas impacts of flying (e.g. including non-carbon aspects such as contrails that are currently omitted) and the overall impact of airport expansion on the climate (including inbound international flights which will increase carbon emissions overseas). It is disingenuous to treat these as zero, or assume that all Jet Zero assumptions can be achieved, without any evidence: both are in breach of the Precautionary Principle and IEMA guidance.

6. The carbon emissions from additional surface transport journeys are not insignificant, and must be assessed separately against both national road sector targets and policies and Surrey and Sussex transport plans and climate strategies.

7. GAL's plans to reduce embodied carbon from construction should be clearly set out, beyond the Climate Action Plan (CAP)'s high-level target currently included. The CAP should be expanded to include full surface access and flight emissions. GAL must set binding limits to constrain and reduce all these GHG emissions.

8. In conclusion, this plan to significantly expand Gatwick Airport, its flights, and its surface transport, will significantly increase greenhouse gas emissions. This will have a significant, negative, impact on the ability of the UK government to deliver its Net Zero strategy, stay within its legally binding carbon bindings and meet its international climate commitments.

Additional Points Arising from Issue Specific Hearings

GACC highlight the points made in ISH4 about the need to consider the worst case scenario in the Environment Assessment, which would mean comparing the with-project case (2047) with the current (2019) baseline, as opposed to the future baseline presented by the applicant. For climate change, this means the full impact from the current situation to future project impact should be considered for carbon emissions associated with the project. GACC take the position that this should be extended to include aircraft emissions as well as construction, on-site operations and surface transport emissions, as stated separately.

Section 8. Air Quality

1. GACC have a number of serious concerns regarding the air quality chapter, assessing the impacts of the airport development over future years. This is specifically regarding the modelling calculations and assumptions it is reliant upon. As a result of this crude, largely desktop-based modelling, GAL is only, at best, able to infer that the airport's growth has limited adverse impact because of the positive measures of government and local councils towards improving air quality levels, to minimise health impacts of air pollution. As such the development undermines the achievements that have been made and will continue to undermine future achievements.

2. By way of context, air quality modelling is used to predict air quality (air pollution) levels at various geographic locations. National and international guidelines to protect people and habitats from air pollution focus on key pollutants (nitrogen dioxide (NO_2), and particulate matter (PM) in particular, though other pollutants can be significant depending on the source of the pollutant emissions). Pollutants are emitted from various pollution sources (e.g. cars, chimneys, aircraft, waste sites, construction sites). The pollutants diffuse, disperse, react and settle, according to the prevailing weather conditions and combine with background pollutant levels. The resulting air quality at a given location can be measured by various monitoring devices; ranging in cost, complexity and accuracy; and based near roadsides or in urban or rural locations.

3. Air quality modelling usually calculates two-dimensional contours of air quality levels over a specified geographical area: e.g. a part of a town or an area surrounding a

planned development that is expected to be affected by the pollutant emissions arising from that development and the levels at various locations can be identified. Calculations are made of air pollutant values averaged over different periods of time: e.g. over minutes, hours or a year, according to the predicted health impacts of the pollutants being considered, describing the short-term and longer-term effects of these pollutants on health and habitats. Air quality modelling relies on: a) historic weather data; b) baseline and future pollutant emissions assumptions (based on the predicted emissions sources); c) baseline measured background air quality levels. All of these have their own inherent uncertainties. Weather data is itself a snapshot of averaged, spot measurements, and the future year weather is not known with any certainty. Emissions inventories are also dependent upon assumptions with regards to road traffic levels, industrial emissions sources and airport related emission sources. Background air quality (i.e. the level measured at schools, at hospitals and in people's gardens) is often based on very crude monthly-averaged measurement devices (e.g. diffusion tubes for NO_2) or roadside emissions monitors, which are very limited in number. Together all of these uncertainties are combined within the crudeness of the available air quality models, which ideally should only be used to compare different development scenarios rather than be relied upon to calculate absolute air quality levels with any accuracy (since they are using so many assumptions in their input data).

4. The confidence in the modelled air quality levels for future years is severely undermined by substantial inaccuracies in all of the aforementioned items. In particular the values for the baseline-modelled year (2018, especially for NO_2) are crudely adjusted to force a fit to the monitored air quality data. For this reason GACC propose that the model is made available for public scrutiny and that an independent statistical review is carried out to validate the assumptions and adjustments to better align the model data to the monitoring data and to review the quality of the monitoring data that is being used.

5. In our view, the modelling must not be relied upon to demonstrate that the future project impacts are not significant.

6. To make this data more robust, GAL should be required to annually review the accuracy of modelled data throughout the development stages, ensuring appropriate mitigation measures are in place should significant impacts be found. This should include reviews on the robustness of pollutant emissions inventories, with revisions of the air quality modelling to reassess and redefine the air quality impacts of the project at each stage to ensure no significant impacts are missed and not mitigated in a development of this scale. Furthermore, GAL should commit to substantially increasing the level of monitoring (covering the key pollutants of concern, particularly at sites vulnerable to project impacts e.g. schools, hospitals and homes likely to be impacted by an increase in road traffic or other airport-related emission levels) to ensure better quality baseline levels for future years upon which the project impacts are superimposed.

7. In addition, a true future baseline should be provided that is independent of any increase in passenger numbers at Gatwick.

Section 9. Water Supply, Waste Water and Flood Risk Assessment

1. This representation considers the impact on water supply, wastewater management and flooding, and the River Mole water environment: including river habitat, water quality and access for recreation/health and wellbeing.

2. GACC request that the evidence supporting SESW's assertion that they can meet the additional demands for the project should be shared for public examination and the proposed assessment of impact by SESW should be completed now so that it can inform this examination, and include both cumulative impact of other developments in the same water supply area, and the impacts of climate change. A water supply assessment, such as from SESW should be required to be provided, and presented on in an Open Hearing, as a matter of urgency such that it can inform the examination.

3. A wastewater impact assessment, such as from Thames Water, on the operation of Horley and Crawley STWs should be required to be provided, and presented on in an Open Hearing, as a matter of urgency such that it can inform the examination.

4. It is our view that the shorter return period chosen by GAL for the airfield is not acceptable and that a 100-year design life, and the climate change allowances for safety critical infrastructure should be equally applied to highway infrastructure and airfield/runway infrastructure. Choosing to under-model the flood impact by selecting a shorter (40-year) design life for runways should not be judged to be acceptable.

5. The River Mole has been the source of extensive flooding to residential areas between Gatwick and entering the River Thames at Hampton Court. GAL's proposal gives insufficient detail on the potential flooding effects of the project on those residential areas, including the effects of climate change.

Section 10. Noise and Night Flights

1. GACC believes that GAL has failed to apply government aircraft noise policy properly in several key respects and that its proposals therefore require significant revision.

2. GAL's choice of the level at which significant adverse effects are experienced by people is not consistent with government policy. The 57dB LAeq 16 hour contour should be regarded as the level from which significant adverse effects occur and accordingly, in accordance with the Airports National Policy Statement (ANPS), development consent should not be granted unless effects above that level have been avoided.

3. GAL has applied the government's Lowest Observed Adverse Effects Level (LOAEL) metrics improperly. As a result, it has materially understated the effects of aircraft noise. It should be required to report and cost noise impacts using the limits strongly recommended by the World Health Organisation. In addition, the CAA should be asked to advise whether the ongoing Aircraft Noise Attitudes Survey suggests any change in attitudes to aircraft noise.

4. GAL should be required to engage properly, under independent chairmanship, to develop new noise envelope proposals. To comply with policy, if development consent was granted, the noise envelope should ensure that noise reduces as capacity grows, at a pace that achieves a genuine sharing of the benefits of growth between industry and

communities. In addition, the noise envelope should cover all periods of the year and reflect a best-case fleet transition that incentivises airlines to introduce quieter aircraft quickly. The noise envelope should be based on a suite of metrics and limits to be agreed with all stakeholders, not a single average noise metric. New noise envelope review, compliance and breach arrangements should be developed and agreed.

5. In compliance with the Airports National Policy Statement (ANPS, 2018) there should be a ban on night flights as a condition to any approval of the DCO.