

Gatwick Area Conservation Campaign (GACC)
19th April 2024

Interested Party Reference number: 20045900

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

Written Representations for Deadline 19th April

GACC Comment on Draft S106 Agreement- Application Document Ref: 10.11

Dear Examining Authority

Please find our further written submissions for the 19th April deadline..

The proposed Section 106 Agreement (**REP2-004**) falls significantly short of the minimum GACC would expect to see for this agreement.

The starting point for the production and agreement of a new S106 agreement should be the inclusion of the all the terms in the current S106 Agreement (Dated 24 May 2022) unless they are obsolete. The proposed draft S106 agreement from GAL is weaker than the existing agreement, whereas GACC believe that the agreement is now out-dated and should be significantly updated.

Additional requirements to each schedule in the current S106 agreement, are listed here. All of these additions should apply to the new S106 agreement, regardless of whether or not development is consented:

Development

An overall cap on passenger numbers and aircraft movement numbers. GACC propose that the cap for future operations of Gatwick Airport be limited to 2019 flight and passenger numbers.

If the DCO is granted all Permitted Development rights are withdrawn.

If the DCO is granted a legally binding commitment that there would be no further runway, terminal or associated development at Gatwick in perpetuity, including no full new runway. No safeguarding of an additional runway, or additional land for other airport purposes outside of the red line of this DCO application shall be permitted.

Noise

To comply with policy and guidance, regardless of whether or not development consent is granted, the noise envelope should:

- a. Ensure that noise reduces both as technological improvements to aircraft arise and/or as capacity grows, at a pace that achieves a genuine sharing of the benefits of growth between industry and communities;
- b. Cover all periods of the year to provide the certainty policy requires;
- c. incentivise noise reduction;
- d. Be based on a suite of metrics and limits to be agreed with all stakeholders, not a single average noise metric; and

- e. Contain review, compliance and breach arrangements that reflect these principles.

Night Flights

The new S106 agreement should include a ban on night flights between 11pm and 7am as required by the Airports National Policy Statement (2018).

Action Planning

To include monitoring of the revised noise bunds at western end to ensure their continued effectiveness and to rectify within six months any measured fall in such effectiveness.

Light Pollution

To include monitoring of light pollution, to ensure compliance and to monitor impact on bat populations.

To include monitoring of foul water flows, surface water flows, water use and flood levels around the airport.

Surface Transport

To limit car journeys on highways to current levels. To require Gatwick Airport to comply fully with new (higher) surface access commitments, including a higher modal share for public and active travel to remove increase in car movements, and negate the need for increase in capacity to the Strategic Road Network.

Based on Gatwick's overall strategy to deliver infrastructure to enable sufficient modal shift to public and active transport to avoid increasing car use to the airport, Gatwick must provide sufficient finance upfront to deliver this infrastructure and ongoing revenue requirements.

Air Pollution

To retain all requirements of existing S106 and additional requirements (including regarding UFP) requested by the Councils.

Greenhouse Gas Emissions

The cap and future reduction of greenhouse gas emissions must be in line with UK overall carbon emission budgets, and be applied not only to airport emissions but surface transport to/from the airport and the total greenhouse gas impact of flights.

Affordable Housing

The Applicant should be required to create an affordable housing fund to fully fund the cost of subsidising the provision of new socially rented homes to provide the need created by future employment at the airport.

Landscaping & Ecology

Gatwick must clearly set out the type and total area of habitat being lost, delay in re-provision, subsequent mitigation and compensation, and on the proposed monitoring and management of newly created habitats. Gatwick must be required to fully mitigate any ecological or biodiversity impact through improvements to habitats around Gatwick Airport.

END

Yours faithfully,
Peter Barclay
Chair, Gatwick Area Conservation Campaign