

Comment by Nutfield Conservation Society (Interested Party 20043186)

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Topic ref. CC.2.1 Climate Change & Greenhouse Gases

We have already submitted evidence (Our Deadline 4 submission dated 17 May 2024) showing how expansion of passenger numbers at Gatwick will result in a proportionate increase of Scope 3 Greenhouse Gas emissions at waste incinerators at Newhaven and Basingstoke (Chineham). We used data provided by GAL in their Operational Waste Management Strategy issued and submitted to the Inquiry in April 2024.

We emphasised then and re-emphasise now that the increase in passenger numbers and consequent increase in Scope 3 emissions is entirely voluntary and planned on the part of GAL.

We anticipate that GAL may wish to argue that these waste arisings would occur in any case, for instance at the passengers' homes and that consequent emissions are merely displaced rather than increased. To rebut this anticipated response we ask the Inquiry to note the ongoing and possibly increased level of retail activity at Gatwick, and the very direct invitation to passengers to spend money on goods they may not otherwise choose to buy. We also note Gatwick's choice of waste disposal method (waste incineration) which may compare unfavourably with methods used by waste operators servicing passenger home addresses, in the UK and other countries.

We also invite the Inquiry to consider and take a precautionary position in relation to so-called Sustainable Aviation Fuels, if only because the expansion of passenger numbers and flights at Gatwick in line with government Net Zero policies is wholly or very significantly dependent on the availability of these SAF. Without such proposed expansion there would be no, or a much reduced requirement for SAF and emissions arising from their manufacture and use would be proportionately reduced.

Because manufacture of SAF at commercial scale is still experimental and unproven, with little published data on emissions arising from their manufacture, it is impossible to estimate whether Scope 3 emissions may need to be taken into consideration. It is equally impossible to state categorically that Scope 3 emissions will not occur.

We draw attention to our previously submitted documents (15 March 2024) evidencing Net Zero Aviation Fuels and Reality of Waste Derived Fuels. The manufacture of such fuels is difficult, with a high proportion of source material being discarded. The safe management and disposal of these by-products and residues may themselves give rise to Greenhouse Gas emissions which may arguably be considered Scope 3 emissions, given that they would not arise if SAF was not manufactured for the sake of expansion at airports such as Gatwick.