

To the Gatwick Airport Inquiry

9 August 2024

Dear Sirs

Introduction the Applicant has consistently failed to present information in a timely manner, preventing proper examination of the Applicants proposals. A Gatwick Environment Authority needs to be created, funded through (for example a 10 per cent levy charged to passengers using the airport and on development spend), that will examine proposals and then rigorously monitor performance, allowing local agencies to voice concerns and ensure effective remedies are implemented.

This would rigorously examine any development proposal and force the Applicant to address environmental issues, such as the water treatment and sewage, and the ability of water treatment centre to cope with de-icing and fire retardant material, to pay realistic levels of compensation in a timely manner, to manage all publicly owned spaces, and to coordinate all regulatory authorities such as CAA and local authorities to ensure a rigorous approach to managing the airports facilities.

(1) Water treatment and wastewater facilities are already not coping, there are no plans in place to upgrade current facilities to adequately deal with the disposal of de-icing and fire-retardant material draining from the airport. The data provided around the current situation, and the ongoing issues around wastewater and water treatment, and the lack of any agreed plan, is extremely concerning.

(2) The Applicant clearly demonstrated during the inquiry that self-interest will dominate, and it will not focus on successfully managing overall activities, only on completing its own tasks, without regard to the overall consequences.

(3) The Applicant has failed to provide for sufficient financial support to enable local authorities to accept land back into their care after development (if allowed) is completed, this must be managed by an external party, funded through a 10 per cent levy on passengers' fees and investment in infrastructure

(4) The CAA failed to demonstrate its independence around management of noise and monitoring, choosing not to attend the inquiry in person, and refusing through the applicant to supply those attending the inquiry with information about noise monitoring locations.

The CAA does not respond to, or report back to, residents who report noise pollution issues or overflying.

There appears to be no authority monitoring and managing the airport in an overall cohesive and coherent manner, and therefore no 'accountable' management of the airport, which (for

example) has an ongoing issue with noise, air quality issues, fees for dropping up passengers (up 20% in 2024 alone), and the overall traffic issues on M23 and many other roads.

(5) Small local authorities such as Charlwood, as well as environment groups such as cagne and conservation groups need a statutory body as a forum

(6) The compensation arrangements offered by the Applicant were woeful and inadequate, the management and implementation of all compensation schemes needs lifting out of the Applicants control, to ensure that proper compensation is paid where needed.

(7) There needs to be an independent body to manage development (if permitted), e.g. ensuring the Applicant provides sufficient building and accommodation for site workers and employees during and after development, the town of Crawley is already desperately short of housing, and there is no capacity to build more because of the water table.

(8) The Applicant demonstrated there would be a very substantial increase in road traffic- <https://www.ft.com/content/d2660188-5c66-4ded-9e9a-bc4ec071b9bc> . This will lead to an increase in vehicle travel and noise.

Gatwick Airport stated in the Brabazon lecturer to the Royal Aeronautical Society that about 90 per cent travel by car. As many passengers are dropped off and collected, (i.e. four journeys), and with about 18500 site workers mostly commuting from remote locations and increase of 30 million car journeys per annum seems a reasonable calculation. In addition, 1800 site workers would commute to the site daily to the site under the proposal for several years whilst development work is undertaken.

The road system does not have the capacity to cope with the additional traffic, this will cause congestion and worse on motorways and other roads around the airport. The Applicant has indicated 90 % of people arrive by road, that there is insufficient parking, and Network Rail has indicated there is no further capacity at the train station. The airport is currently operating at, or above, maximum capacity already.

The Applicant questioned the conservative and reasonable estimate of 30 million extra car movements per year but did not offer its own calculations.

The Gatwick Environment Authority will need to be given powers to enforce development of M25/M23 and other adjoining roads by the Applicant before any development is permitted. For this reason, the Applicants business case is flawed because the additional costs for road development are very much higher than described in the Applicants proposals.

(9) Train travel capacity is insufficient, there is no remedy for this, the lines and station are at maximum capacity, and Network Rail are already unable to respond to demands for a rail service from Tonbridge to Gatwick.

(10) Parking capacity must be Increased, not capped, the Gatwick Environment Authority will need to be given the authority to empower the cessation of off-site parking around the airport. Even without the proposed development, the Applicant must be compelled to address issues that arise directly from their activities, at pace.

(11) Suppressing parking at the airport, as planned, will cause queues on M23 and M25 increasing the risks of multiple car road traffic accidents and increase the already existing problem of off-site parking being a blight on local communities.

(12) The Applicant's prediction for growth is based on growth in traffic between 2014- and 2019. As levels of traffic are only now reaching 2019 levels, and the airport is beyond maximum capacity in terms of traffic access and parking, water treatment capacity, and noise pollution over the area. The prediction of sustained growth till the year 2048 is unsupported and seems totally unrealistic, so the Applicant seems unlikely to be able attract sufficient air traffic to recover the investment costs it will incur.

The business case also seems implausible when the aging demographic of the population, and the increase in use of virtual communications for business such as Teams is taken into account, as well as increasing concern across the population around the sustainability of aviation.

(13) The Applicant's claim that the site can achieve Zero emissions is flawed. Sustainable Aviation Fuel would currently support 0.25 of demand. By 2030 the availability will be 10 per cent of that needed to support current European targets for 2030, so to claim by 2040 there would be a total supply of SAF appears totally unsustainable. In fact, with aviation causing 1% of global warming, and Gatwick having a very busy runway, some would consider it a globally leading polluter.

(14) The Applicant has not demonstrated in any way how aircraft will move around the airport, and take offs from the Emergency runway appear to be able to end embedded either in aircraft waiting to taxi, (why aircraft are currently allowed to wait at the end of the emergency runway is not clear), or in the South Terminal

In the event that an aircraft is stranded on the main runway, and the emergency runway being used for a take-off, an aircraft making an emergency landing, (e.g. 'Miracle on the Hudson') would appear to have nowhere to land. This appears to be a policy of zero resilience.

(15) There are expert witnesses who will highlight the endless problems around flight path capacity, noise pollution, and air quality pollution, as well as the unknown issues around SAF, (Sustainable Fuels are still a developing product).

In conclusion Gatwick is a poor choice of site for further air passenger expansion, it is already slightly over maximum capacity, which should be capped below the current usage, say at 30-35 million passengers per year. This would recognise and reflect that the area is at capacity in terms of housing, the water table, wastewater management and rail and road access.

It is doubtful that the application is capable of approval as because of the confused terminology between the Emergency Runway and the request to create a Northern Runway, the lack of clear information including a model of how the taxiing, take and landings would work and actually be more efficient than the current arrangements, the lack of timely provision of information in response to enquiries, the lack of resolution of water treatment issues before the application was made, the total misunderstanding of the affect on traffic in the whole area, the lack of attendance or concise information or support by other agencies such as a CAA, and the non-attendance of the CEO or Planning Officer for the Airport suggest this was not a serious application.

In addition, the wisdom of losing the capability of the emergency runway and taxi way remains unproven and unexplained. The proposed expansion at Gatwick should not proceed.

Manston would be a much better site to develop, as noise pollution would occur over the sea, not over densely populated areas.

Kind regards

Nigel