

Dear Planning Inspectorate,

I would like to make the following final points before the examination process comes to an end.

#### REDUCED DEMAND CAUSED BY HEATHROW EXPANSION

The fate of Heathrow's new runway is not fully decided, so the UK should accelerate the decision about Heathrow and the ExA should recommend pausing the decision about any other south east of England airport expansion until the Heathrow question is settled. This is because if Heathrow goes ahead the passenger demand forecast for Gatwick expansion would be dramatically changed casting severe doubt about the robustness of how Gatwick are predicting increased passenger demand in the south east. Such changed demand would clearly reduce the economic benefits that Gatwick have presented.

#### CARBON EMISSIONS

In accordance with the recent FINCH vs Surrey County Council Supreme Court adjudication, all carbon emissions (and consequences) relating to the NRP need to be assessed. Thus for the UK to meet its PARIS accord obligations which are enshrined in law, carbon emissions need to be decreased and not increased. GAL provides no evidence that SAF (sustainable aircraft fuel) will successfully provide sufficient reductions in time for NRP opening and therefore it is not yet reasonable to assume SAF's will be the answer. Instead an incremental increase in flights can only be made as SAF or other technology evolves. Therefore an offer could be made to GAL that they can build a new runway, but any increase in flights must be offset by the (GAL promised) decrease in CO2 emissions from sustainable aircraft fuels. This will mean the overall CO2 emissions can be capped at 2019 levels whilst allowing GAL to increase flights.

A direct downstream consequence of the FINCH ruling is the need now to consider how each extra aircraft takeoff contributes to excess world mortality. There is research that links the consequences of 'grams of carbon emitted' to climate change related deaths. ( search nature.com for 'mortality cost of carbon'.) It is approximate and not exact but it appears that selling one return slot at Gatwick, if used 5 days a week for 30 weeks of a year is linked now to the deaths of 2 people before 2100 (using calculations by ICAO). Has this downstream consequence been explored by the ExA so far? I assume not. 60,000 new flights would involve around 30,000 new slots. Therefore  $30,000 \times 2 = 60,000$  excess deaths. Whether the figure is 10,000 or 60,000, these numbers need debating as they are a starting point for a conversation about whether we should be encouraging/facilitating the most highly polluting mode of transport ever, in an age which is classified as a climate emergency. This issue needs urgent examination by ExA. The context for that examination is provided below at COP27.

12 November 2022, Sharm el Sheikh – Unabated climate change will cause 3.4 million deaths per year by the end of the Century, new data presented to COP27 today shows. Health-related deaths of the over-65s will increase by 1,540%, and in India alone there will be 1 million additional heat-related deaths by 2090, if no action to limit warming is taken, the data shows.

The data is part of the 'Health Data Explorer', published today and commissioned by the Lancet Countdown and the Climate Vulnerable Forum, a group of 68 developing countries highly vulnerable to climate heating.

The Health Data Explorer outlines the catastrophic health consequences of climate inaction, and the major health gains that would arise from taking urgent measures to limit global temperature rise to 1.5°C.

If the world managed to meet the 1.5°C target, 91% of the projected 3.4 million deaths would be avoided. If climate heating overshoots 1.5 °C but is limited to 2°C, the number of deaths avoided drops to 50% — underscoring how crucial it is to limit global warming to 1.5°C.

and from the Guardian 12/8/24

"Hot weather inflamed by carbon pollution killed nearly 50,000 people in Europe last year, with the continent warming at a much faster rate than other parts of the world, research has found"

#### NON SHARING OF BENEFITS

Gatwick are not offering any substantive benefits to those communities most affected under arrival or departure flight paths. There is no compensation to residents suffering increased noise/awakenings from increased numbers of flights. Therefore Gatwick should only be able to increase the number of flights if the noise energy dose (measured by the area within the 51db leq noise contour of 2019) is matched to 2019 noise levels. In effect the natural decline of noise emissions from newer aircraft can be used to slowly increase the number of flights. In this way the benefit of technological advance in reducing engine noise can be used to prevent any further degradation of life quality of residents. Gatwick will of course to push back saying it is 'unacceptable' to them. That is a normal part of a negotiation process whereby one party takes an extreme position. The inspector must be prepared for those tactics.

The benefit to Gatwick of having a new runway will be increased profits and increased asset valuation. According to GAL the new runway will promote peak spreading in the daytime. If we assume that will happen, then a balancing measure would be to ban night-time flights as is the case with Heathrow. That would then be an effective sharing of the benefits of the new project.

#### FASIS

NRP will create the need to increase airspace capacity which in turn helps justify FASIS - so it is absolutely fair and reasonable to say that the two issues ARE connected and intertwined :- you therefore cannot keep the two processes of consultation 100% separate, if you do, it is non transparent and non democratic as the public will not know about the likely noise impacts following FASIS with the new runway scheme. PINS /SoS must recognise this and now link the 2 processes as happened for Luton airport.

As evidence of the above, I am a resident under the BOGNA swath and I do NOT understand the implications of how many flights per day will affect my quality of life, this is partly due to lack of mapping that would better allow me to assess impacts at my location (no N60 daytime contours) and partly because FASIS is very likely to go ahead in 2027 and yet I do not know the impacts of the runway scheme with FASIS. This is an incredulous situation, one that is not transparent, fair or democratic. FASIS IS expected to be implemented in 2027, therefore all the assessments of air noise in the runway DCO examination are not representative of any design year as they do not reflect the actual distribution of noise from 2027 onwards, with or without the NRP project. Counsel for GAL said on 31/7/24 in a hearing that the 2 processes were separate and one does not require the other (wrong as one partly drives the other), but the bigger point is that there is a very reasonable probability that FASIS WILL go ahead, and therefore FASIS will affect the runway project by changing the

noise impacts, and therefore the likely worst case impacts of NRP are not being shown/assessed in this DCO process. Why does the inspector not recognise this and be more forensic when questioning GAL's counsel? There is still time to consider this.

#### DEMAND FORECASTING

There are 10% un-allocated slots at Gatwick in 2023. Peak spreading and increasing business travel are key assumptions underpinning the increasing demand forecasts and resulting economic benefits of the new runway scheme. However current evidence does not support Gatwick's growth assumptions. Pre-covid travel behavior is different to post covid passenger behavior and this cannot be ignored as Gatwick is doing by only extrapolating pre-covid travel behavior. Further, Gatwick is NOT a hub airport and therefore their peak spreading assumptions are highly optimistic and not evidence based. This is being publicly highlighted by the disagreement between the JLA (Joint Local Authorities) position of demand forecasting vs Gatwick. Gatwick is extrapolating 2014 -19 behaviors (pre-covid) out to 2040/50 which is not reasonable. Sensitivity testing of the demand forecast has been made to explore the effect on the economic benefits. These results according to GAL's counsel on 31/7/24, show that a lower passenger demand will create higher economic benefits (Specific Hearing 9 ISH9 - Day 2 - Part 6 - 31 July 2024). This is illogical, counter intuitive and very damaging to the applicants case. Following his logic, the most economic benefit will be gained by NOT increasing capacity or demand and not building a new runway. In fact the counsel said the sensitivity analysis involved suppressing the 2019 baseline demand, which is the reason why his future economic benefits are higher. This is utter nonsense, it is the FUTURE year demand forecast that should be suppressed (not the baseline as he said) which will give lower economic benefits. The counsel has skirted his way round this issue saying sensitivity analysis has 'been done' - yet his statement on the matter was complete nonsense. Sadly the inspector on the day did not challenge this nonsensical position but needs to urgently do so now in writing.

#### NON TRANSPARENCY

A very small total of 7 community locations are used to show N65day and N60 nighttime overfly (14.9.2) frequencies. These locations are not representative of the of the existing tracks of the NPRs (noise preferential routes) and populations - all 7 are either to the north, west, or east. There are NO locations on the south BOGNA NPR which accounts for most of the traffic from Gatwick to southerly locations in the Mediterranean area. Gatwick (once again) are being deliberately selective in their so called "representative" locations to hide impacts and to give the public a non-transparent but apparent 'all is good' impression of the project impacts. This is just not true and must be called out.