

We wish to express our continuing opposition to the DCO application as we believe that the following issues have not been adequately addressed (due to the refusal of Gatwick Airport Ltd to concede the points raised by numerous others):

ISH1: Given that what GAL proposes in its DCO application is essentially a new runway, its proposal does not comply with Government policy (as contained in ‘Beyond the Horizons – Making Best Use of Existing Runways’), and should in principle therefore be rejected. Otherwise:

ISH9: In view of the recent High Court judgment that the Energy Secretary’s Carbon Budget Delivery Plan failed to comply with his duties under the Climate Change Act 2008, the “carbon cap” scheme proposed by CAGNE (REP8-143) is more pertinent than ever and should therefore be made a requirement of any DCO that might be granted in order to ensure that Gatwick Airport’s emissions are subject to annual maximum limits such that year-on-year carbon reductions achieved (not only in respect of Airport operations and flights but also as regards ‘Scope 3’ emissions).

ISH9: In view of Government commitments to improve air quality nationwide (as under the 25-Year Environment Plan), it is clearly unacceptable that GAL offers only to monitor local air quality rather than to avoid pollutant exceedances, and therefore minimum standards should be stipulated as legally-binding conditions of the DCO itself, rather than left to be negotiated subsequently as part of any ‘Section 106’ agreement with the relevant local authorities.

ISH90: The DCO should require a 0.5-decibel reduction year-on-year in the noise contour surrounding the Airport (as proposed by the Planning Inspectorate at ISH9), together with reinstatement of a night-flights ban (between the hours of 11.30pm and 6.30am), and full-loss compensation for all residents affected by increased noise from the additional flight movements (including for those living outside the current noise contour).

Use of the surrounding airspace requires ‘modernisation’ in order to accommodate any increase in flights from two runways (as noted in the representations from EasyJet and British Airways), and therefore the issue of airspace modernisation should have been addressed in the DCO application (rather than left to be pursued in isolation by the CAA under the FASI-S/LAS programme).

Provision of an on-site wastewater treatment plant should be a mandatory requirement of the DCO, in order to ensure that untreated sewage is not discharged into local watercourses due to the evident inability of Thames Water’s treatment works to cope even with existing flows, much less any increase that would result from Airport expansion. (It may be remembered that in 2023 Thames Water was fined £3.3 million for untreated discharges into the Gatwick Stream and River Mole: <https://www.bbc.co.uk/news/uk-england-sussex-66097906>).

ISH9 – Housing Fund: It is not acceptable for GAL to dismiss as not material to its application the area’s lack of affordable housing and related amenities, given that any large-scale influx of workers would exacerbate the existing shortage of affordable housing, as well as add further to the pressures on schools, healthcare and other social infrastructure (together with such physical infrastructure as roads and sewerage). It should be noted that the ‘Gatwick Diamond’ has for long been an area of low unemployment, with existing unskilled jobs at the Airport already difficult to fill, so that any increase in the number of jobs created locally would therefore have to be met by “importing” workers from outside the area (including from abroad?). Neither would rail commuting by workers from south London or the Sussex coastal towns be a viable alternative (given fare costs and predicted congestion levels on the London-Brighton Main Line), whilst trunk-road widening or dualling to facilitate additional car travel to the Airport would not only undermine the Government’s sustainable transport commitments but be gravely damaging to nearby National Landscapes.

GAL should therefore at least establish a Housing Fund to assist local authorities cope with the influx of workers and their families who can be expected to migrate to the area, given that its so-called 'Community Fund' has criteria that exclude funding to mitigate areas of impact (focussing essentially instead on "goodwill" opportunities with local charities).