

**From:** Paul Chandler  
**Sent:** 21 August 2024 20:17  
**To:** Gatwick Airport  
**Subject:** RE: TR020005 Gatwick Airport Northern Runway Project - Interested Party Reference number: 20042137

Application by Gatwick Airport Limited for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project  
Request for further information and written comments and Procedural Decision in respect of Project Change 5  
Interested Party Reference number: 20042137

Dear Sir or Madam,

*R17f.7 London City Airport Decision*

*The ExA note the recovered appeal decision (APP/G5750/W/23/3326646) on the variation of conditions to allow expansion of London City Airport was published on 19 August 2024. Please provide any comments on this decision and the relevance or otherwise of it to the Proposed Development, should you wish to do so.*

My concern with the London City Airport Decision is that it would seem to indicate that the airport expansion and growth in passenger numbers is a good thing according to the Secretaries of State so I examined the text of the Government response.

*Climate Change*

*18. The Secretaries of State note that the assessment approach in the ES uses 5 tests of significance, which is a widely adopted approach which has been used in a number of airport expansion proposals and endorsed by the High Court (IR14.149 to 14.150). They agree with the Inspectors for the reasons given at IR14.147 to 14.158 that with specific regard to climate change, the proposals would ensure compliance with national policy on this matter, including the Framework, APF, MBU, ANP, Flightpath to the Future (May 2022) and Jet Zero: Strategy for Net Zero Aviation by 2050 (July 2022), and there would be no conflict in terms of national and development plan policy, in particular with LP Policies T8 and GG6 on this matter. They further agree that The Mayor's 2030 target signifies a direction of travel for future London policy, but it does not currently have statutory weight as part of the LP and that aviation emissions are a matter which are controlled under other national control regimes (IR 14.157 to 14.158).*

I have to agree that there would be no conflict in terms of national and development plan policy but in my opinion they fail to take into account the current circumstances and the progress of national policy. Climate change and its effects upon the planet are becoming apparent day by day. The level of carbon dioxide in the atmosphere increases consistently and the predictions of negative impacts such as heatwaves, floods and drought are coming to fruition. The items of national policy are mentioned in the 5 tests of significance.

*14.149 The assessment approach in the ES uses 5 tests of significance which compares the carbon emissions with:*

- i) the 'planning assumption' (37.5Mt CO<sub>2</sub>) that was taken into account when setting the Fourth and Fifth Carbon Budgets;*
- ii) the Sixth Carbon Budget;*

iii) the DfT Jet Zero Strategy's 'high ambition' in sector trajectory;  
iv) national policy to reduce aviation emissions to net zero by 2050; and  
v) considering whether the increase in carbon emissions is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets.

14.150 This is a widely adopted approach which has been used in a number of airport expansion proposals and endorsed by the High Court.<sup>337</sup> It is important to note that aviation emissions are regulated at national level, with reductions being driven by Government policies, incentives and participation in the UK ETS which are a 'cap and trade' scheme and CORSIA, which is a global trade scheme. The Government retains the ability to introduce additional measures in order to control aviation emissions should they be needed and is under a legal duty to ensure that the net zero carbon target and carbon budgets in the CCA 2008 is met.

I was particularly concerned with iv) national policy to reduce aviation emissions to net zero by 2050. I found a Government Environmental Audit Committee Report into this topic and the Government responses to their recommendations.

*Net zero and the UK aviation sector: Government Response to the Committee's Third Report*

*In the Jet Zero Strategy, the Government also committed to monitor progress against our emissions reduction trajectory on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027, five years after publication of the Strategy in 2022, and we will ensure that findings from this research are considered in the review process.*

Which I translate as: We will be looking into that soon but not just yet.

*Given the complexity of decarbonising the aviation sector, the long lead in times and high levels of uncertainty, the outputs from the modelling undertaken by the Climate Change Committee, the Government and Sustainable Aviation vary as to the projections of likely emissions reductions from UK aviation by 2050.*

Which I translate as: We are not sure what outcome we will be measuring when we do come to look at it.

*The Climate Change Committee use the same aviation model as the Government for its emissions projections, however the trajectories vary due to the different underlying assumptions. The Government is awaiting Sustainable Aviation's technical document accompanying their roadmap which will detail the underlying data and assumptions underpinning the modelling allowing for a more detailed comparison.*

Which I translate as: We will have to wait and see.

*Sustainability is an overarching principle of the strategy. The environmental benefits of the strategy will contribute towards our Jet Zero emissions reductions targets for the aviation sector. One core element is airspace integration, which will enable new and innovative aircraft to share the skies safely alongside existing air traffic. These new technologies, such as Uncrewed Aircraft Systems (UAS or commonly known as drones) and certified electric, Vertical Take-Off and Landing aircraft (eVTOLs), could help facilitate some modal shift from road or rail for passenger journeys, deliveries or freight to*

*more sustainable electric options, and open up new aviation markets. It is anticipated that technologies supporting UAS and eVTOLs will also benefit the future operation of other aircraft.*

Which I translate as: We might have some exciting new technologies such as drones (UASs which are currently being used to kill soldiers in Ukraine) that will help us stop people using electric trains (ETs) and electric road vehicles (ERVs).

*The Government's vision is for the UK to be a global leader in the development, production, and use of SAF, allowing us to grow the sector sustainably and achieve net zero flight. Building domestic SAF production capacity represents not only a significant economic opportunity but also a means for strengthening our energy security.*

*The UK will introduce a SAF mandate from 2025, requiring at least 10% of UK aviation fuel to be SAF by 2030. Fuel suppliers will receive awards, (in the form of tradable certificates) for the SAF they supply, proportionate to the GHG savings of their fuel.*

*The mandate will introduce strict sustainability criteria to ensure SAF delivers genuine GHG emission savings. Fuels eligible for award include waste and residue derived biofuels, recycled carbon fuels and power to liquid fuels.*

*Fuel producers will need to evidence the lifecycle emissions of their fuels to receive awards and fuels will need to deliver minimum GHG savings over fossil kerosene.*

*Strict sustainability criteria will ensure significant GHG emissions savings are delivered and will provide protections against land use change and loss of biodiversity.*

Which I translate as: We have a strategy to include SAF in our future economy, both encouraging and policing producers to be sustainable as well as UK based and if there is world war III then we'll have waste and residue derived fuels to keep us warm in a nuclear winter.

*The Government takes every opportunity in international forums to press for the highest standards of sustainability in the production of SAF.*

Which I translate as: We will definitely not be blinking first.

In conclusion, the Government responses to the Environmental Audit report on Net Zero for the Aviation industry give me no confidence that there is any progress towards Net Zero and that the wait-and-see attitude being adopted is the opposite of the approach required to tackle the problem of aviation emissions from flights and it makes no sense to compound the problem with additional flights at London City Airport which in fairness are almost insignificant compared to the increase in flights being envisaged by the expansion proposed at Gatwick Airport.

yours faithfully

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Reigate and Banstead Borough Councillor