

Dear Sirs

This Public Inquiry should have been held in a location large enough, with sufficient resources, and ample notice should have been given of the inquiry, with a proper YouTube link, similar to that operated by most current Public Inquiries. It was unfortunate that better access was not available to the public, and that information was not more widely shared. The case presented was unclear and is not capable of approval by the Secretary of State, the submission needs a much longer term of examination to determine exactly what the Applicant intends to do, to proceed now would be quite dangerous.

#### 1. GAL Application

- a. It was very unfortunate the Public Inquiry was permitted to proceed during the election, and doubtful that the Secretary of State should have issued an exemption to allow the inquiry to proceed. Proceeding certainly wrong-footed local communities, and undermined transparency. A highly controversial proposal such as this should have been held back until after the recent General Election, as are other 'controversial' processes are under pre-election procedures, to allow proper transparent disclosure and discussion by and with the public.
- b. 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

#### 2. Runways

- a. Gatwick's main and backup runways situated too close together, for the backup to be operated as a second runway. The centre lines of the two runways are **198 metres** apart. International rules stipulate a minimum distance between the centre lines of parallel runways of 210 metres "when the runways are intended for use by medium or heavy aeroplanes. Anyone watching YouTube films of an Emirates 380 landing [Unbelievable AIRBUS A380 HARD CROSSWIND LANDING during a STORM at Düsseldorf - 4K \(youtube.com\)](#) or [A380 Lands Sideways In Extreme Crosswind \(youtube.com\)](#) in a cross-wind, bearing in mind the dimensions of that plane; (with a wingspan of 261.8 feet (79.8 meters), a length of 239.5 feet (73 meters) and a maximum take-off weight of more than 540,000 kg ; and how little room there is,

especially if two of these aircraft were on the runways at the same time. Never risk saying aircraft colliding on runways will never happen, just read the account of the events that led to the Tenerife air crash). For this reason alone, this project should not go ahead. The Airbus A380 is truly a giant, but when commercial pressure is on to get aircraft in and out of the airport, all that will be forgotten, the proposal is clearly unsafe. The solution of moving the centre line over a little, does not address the inherent dangers of large jets operating in close proximity, and the dynamics of how the airport would operate is not satisfactorily explained, with incoming flights needing to reach the terminal whilst others take off, with the only spare taxiway being too narrow, and wrongly positioned, to allow aircraft to safely transition across the airfield. 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

- b. 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. There is no convincing evidence offered of any strategy to handle any such emergency. This appears to be a policy of zero resilience.

### 3. Safety

- a. Safety at the airport is poor, there is an aircraft, (possibly a **Ilyushin Il-62**) **has been** parked near the main runway for over a decade, (this clearly represents an unnecessary risk. The truth is that it's all right till it is not, and then it is too late. Gatwick quite wrongly are pushing the boundaries way beyond their competence, The airfield can operate safely at around the current maximum capacity, but no more than that should be allowed, The Applicants proposal is a massively bad idea, it breaches the original guidance and planning consents issued to the Airport, and already previously agreed by the Airport. If the airport cannot be run responsibly, it could be better pulled from private and overseas ownership and the capacity should be reduced. To suggest that the airport be allowed to cause the compulsory acquisition of property adjacent to the airport is both selfish and justified.

### 4. Noise

- a. The CAA does not respond to, or report back to, residents who report noise pollution issues or overflying; there are no independently verified

and publicly available statistics about noise, however there is clearly an overriding concern about noise over a vast area.

- b. Currently Where overflying occurs of the local towns and counties, the current complaints system does not work. There is no response (from the CAA?), and no feedback to the public. The CAA seems to be wholly unaccountable to anyone and does not appear to operate independently from GAL. The CAA seemed silent and unrepresented at the Inquiry. Very recently overflying of Crawley has mysteriously been rare in recent months, but it happens, its intrusive, low-level flying is noisy and causes concerns, and this noise pollution happens solely at the airport's convenience. However, the phone lines that are meant to exist to report excessive noise don't seem to record events, and no response, acknowledgement, or explanation is ever given. The support lines as operated are (deliberately), a complete waste of time.

## 5. Pollution

- a. 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.
- b. Importantly is more than obvious that the water table cannot cope with more activity or housing around Crawley, look at the issues at the proposed housing site at Ifield. Sewage is also an issue, there is insufficient capacity for existing demand, the airport should not be allowed to hog everything the town needs for the future. Stunningly the issue of runoff from the airport is not in the submissions, suggesting Gatwick is singularly unaware of the issues and damage it causes. If it gets into the representative drinking water, they may take a different view. Back in the 2010S, BEFORE MAKING THIS Application, the applicant should have addressed the water safety issue, 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.
- c. The airport is a massive cause of pollution, for example de-icing material, ((a medium or large aircraft consumes 3,800 Litres of diluted fluid). This subject and its effect on the water treatment work, is not

even considered in the Applicants proposal, typical of a lack of diligence in the Application. Energy consumption, through power usage, dumped fuel from aircraft, fuel used in air travel, and the loss of air quality, this cannot continue to grow as the realities of net zero bite, with no realistic alternatives, except a very limited supply of green fuel, 10% of aircraft usage at most. The site for future airport expansions should be at locations such as Manston, which can be approached from three sides over the sea. Gatwick is not a plausible location for future expansion, in fact shrinkage to produce a more balanced community would be preferable, the proposal is flawed.

- d. Sustainable Aviation Fuel SAF - The Applicant's claim that the site can achieve Zero emissions is flawed. 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 cause 1% of global warming, and Gatwick having a very busy runway, some would consider it a globally leading polluter.

6. The need for Gatwick Environmental Authority to examine proposal to

- a. An independent Authority should 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.
- b. 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.
- c. 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.
- d. The CAA has 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. Small local authorities such as Charlwood, as well as environment groups such as CAGNE and conservation groups need a statutory body as a forum.

- e. 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.
- f. The Gatwick Environment Authority would need to be given powers to enforce development of M25/M23 and other adjoining roads, funded 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. 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. The Applicant questioned the conservative and reasonable estimate of 30 million extra car movements per year but failed not offer its own calculations. The figure suggested is probably about correct.
- g. **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.**

7. Transport infrastructure in the area cannot cope: -

- a. Trains services already can be chaotic and unreliable, I speak as a commuter, so this is not a hypotheticals view. The rail system cannot cope, other additional services that are needed, e.g. a travel route from Kent to Gatwick is not even on the horizon, so arguing that further connectivity can be provided is simply and demonstrably ludicrous. 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.

- b. The so-called smart motorway the M23 is unsafe, it should never have been opened as a smart motorway, the warning systems don't work properly, the road systems do not cope, and the ongoing review into smart motorways has been ongoing for years, so to argue further changes can be made is utterly implausible.
- c. Cycles routes around Crawley are generally hopeless, and walking routes to the airport are not much evident, the reference of national Cycle route 21 is somewhat ludicrous, it's a low volume leisure route. Again, Crawley has needed significant cycling infrastructure improvements for decades, to argue this will suddenly happen is ridiculous.
- d. Parking at the airport is a known and massive issue, the parking costs in the airport are excessive, and the car parks are inadequate, try parking at North or South, parking is preserved for those who can be made to pay more. The airport has done nothing about this persistent problem for decades. As a result, there are cars dumped in areas including woodland for example look opposite Crawley Garden Centre. Then consider the fees for drive through stopping for passengers, a charge of £5 issued to deter traffic the airport cannot handle, increased by 20% this year to £6, greed and exploitation fuelled by having a monopoly. The airport is a bad neighbour, it has demonstrated that the airport does not have the ability to operate well at current capacity, nor does it have the capacity for planned expansion. 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.
- e. Local road systems struggle to cope, this is particularly true at the Hazelwick roundabout, a bottleneck not even mentioned in the Applicants proposal; the town did not get an Ikea store because highway planners did not accept the road system had sufficient capacity, those are road systems feeding the demands of the airport, so that in effect is that the airport is choking the town and removing capacity.
- f. 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.

- g. 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 therefore currently operating at, or above, maximum capacity already.

#### 8. Use of current facilities

- a. Gatwick itself is crammed with shops, the airport is vastly and unacceptably inefficient, it takes hours to get through, and competes with local trading. Shopping is not essential to air travel, and any changes to the airport must prioritize retail closures at the airport. That might provide a start to increasing the through-put the Applicant wants, whilst not requiring another runway.

#### 9. Housing Accommodation in the area

- a. 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.
- b. The allocation of £1m over 9 years, to assist with asylum housing is derisory. A simple calculation of 3000 extra staff each needing around £800 per person per month for accommodation would over 9 years, plus 1800 staff for 3 years for construction would indicate around £33million a year should be allocated into an accommodation budget, or around £400 million over 9 years, so the gesture of £1m simply underlines the applicants total lack of awareness about the impact of their proposals.

#### 10. Costings for the proposal / Demand for capacity.

- a. 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. This could likely lead to commercial failure, with the State incurring costs.
- b. The business case 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.
- c. Overall if these costs are included, plus the necessary improvements to the M23 and other road projects in the area, plus all the improvements needed to water treatment, sewage and the massive need for additional parking to stop cars being left around local neighbourhoods, indicates this is a £5bn project, that is simply not viable.
- d. Surrey's comments about the Applicant and transparency and whether they have acted in good faith are enlightening. It remains likely that the correct course of action is to bring Gatwick totally back under public control.

#### **In conclusion**

The Applicant's case was poorly presented, unclear, not transparent, and insufficiently costed, I have outlined hard facts, the realities, truths, not the possibilities and hypothetical potential developments the Applicant's proposal hints at that will actually never happen. The existing level of development of Gatwick is already harming the community, noise, flooding, traffic chaos, Motorway carnage. That is the reality. It was notable that senior executives from GAL failed to attend the enquiry, giving rise to the question as to whether GAL expected the Application to be taken seriously.

Further development will be harmful, and potentially dangerous because the runways are unarguable too close, and since the infrastructure cannot cope. The Applicant's proposal is not fully costed, even just increasing the capacity of the M23 South of Gatwick, to Brighton, based on the £165m cost of the smart motorway between Redhill and Gatwick, (where there was yet another multi-vehicle accident



this morning between J8 and J9), would cost billions. One can only suspect a fully costed proposal, (£10 m for one roundabout is really an insult), would not have given the applicant a business case that they would themselves have supported.

Further proposed development should be halted, one hopes public pressure will mount for the Airport to be brought back into responsible public ownership. The Applicant's proposal to increase the use of Gatwick is irresponsible. Proposals for ongoing dialogue with affected parties is not only disingenuous, but in also in reality does not offer practical solutions to which there are hard commitments, the Applicant's proposal falls short of an acceptable standard.

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, for example 30 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.

This Application is NOT 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 Public Inquiries, the lack of resolution of water treatment issues before the application was made, the total misunderstanding of the effect 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. Government development of Manston remains the best solution to any possible London's air traffic problem, really addressing the noise and pollution problems and the Applicant has demonstrated that a Gatwick Environmental Authority is required to manage the airport, although the Applicant is unable to demonstrate the demand for extra capacity actually exists.

Thank you for giving this letter your attention.

Dear Sirs

This submission proposes the establishment of a Gatwick Environment Authority. This Gatwick Environment Authority would consolidate the external management of Gatwick Airport, within a single body, allowing detailed ongoing appraisal of all operation and development by the airport, providing a focused coordination of all stakeholders, allowing everyone access for proper representation, and would include CAA, NATS, National Rail and the Highways Authority, Thames Water, Local Authorities including smaller Authorities such as Charlwood and would provide a means for local residents to effectively express views on airport operations, ensuring issues are addressed and compensation is paid as appropriate.

1. The independent Gatwick Environment Authority would rigorously examine any development proposal and force the Applicant to address environmental issues, such as water treatment and sewage, and the ability of local water treatment centre(s) 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. On an immediate basis the Gatwick Environment Authority would ensure that the development of the 'run off' water treatment and wastewater treatment is immediately improved to a level that meets the current level of demand, the submissions to the inquiry having revealed this is not currently the case.
2. Gatwick Environment Authority would ensure all publicly operated areas within the airport area are operated for the good of the community and the environment.
3. Gatwick Environment Authority would ensure sufficient financial support to enable local authorities to accept land back into their care after development (if any development were to be allowed) and would manage any such land.
4. Gatwick Environment Authority would ensure independent management of noise and monitoring. Small local authorities such as Charlwood, as well as environment groups such as CAGNE and conservation groups would use this statutory body as a forum for detailed discussion, and Gatwick Environment Authority would be empowered to force the Applicant to take action where necessary.
5. Gatwick Environment Authority would be given necessary powers to enforce development of M25/M23 and other adjoining roads, funded by the Applicant before any development, (if any development were to be allowed) is permitted.

6. Gatwick Environment Authority would ensure that compensation is paid out properly and promptly where applicable, to ensure the management and implementation of all compensation schemes is lifted out from the Applicants control, and to ensure that proper compensation is paid where needed.
7. Gatwick Environment Authority would also explore how train travel from Kent could be increased to meet current demand ahead of any development, (if any development were to be allowed).
8. Gatwick Environment Authority would also ensure that current parking provision is adequate, that offsite parking in the area is eliminated, and that Parking capacity is Increased, not capped, at the airport. The Gatwick Environment would compel the Applicant to address issues that arise directly from their activities, at pace.
9. Gatwick Environment Authority would also ensure the cost of drop off / collection of passengers is eliminated, i.e. brought back to pre-pandemic levels.
10. Gatwick Environment Authority would also ensure that prices charged to consumers at the airport are reasonable.

Gatwick Environment Authority would be financed through a 10 per cent levy paid on the price paid to the airport by all passengers and received by the airport when flying to or from the airport. This ten per cent levy on passengers' fees and investment in infrastructure would start immediately rather than waiting for any possible future development to commence. Current shortcomings in governance of airport operations would therefore be addressed urgently and would allow any proposal for development by the Applicant to be fully defined and finalised, and rigorously examined, before submission to any public planning inquiry.

Kind regards