
FAO

Secretary of State
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YOUR REF: TR020005

OUR REF: JBB/JEK/00206566/1

DATED: 26 February 2025

URGENT

Dear Secretary of State

Application for Gatwick Airport Limited seeking Development Consent for the Proposed Gatwick Airport Northern Runway Project (ref: TR020005) – Climate Change Committee Seventh Carbon Budget Advice

1. We write on an urgent basis on behalf of the interested party, Communities Against Noise and Emissions (“CAGNE”, interested party reference: 20045369).
2. The Climate Change Committee, the UK’s independent statutory body on climate change, has today published its advice on the level of the Seventh Carbon Budget (2038 – 2042) (the “7CB Report”).¹ The overall recommendation of the report, is that the UK should cut its emissions to 87% below 1990 levels by 2040 under the seventh carbon budget and that 5% of those emissions reductions should come from the aviation sector.
3. The 7CB Report makes a series of relevant recommendations in relation to emissions in aviation which should be taken account of when determining this application.
4. By way of example, the CCC’s approach to non-CO2 effects has changed. The 6CB Report emphasised the uncertainties around these emissions. The 7CB Report estimates the expected increase of non-CO2 effects by 2040 (p.226); includes them as a key indicator for the aviation sector (Figure 7.6.3, p.228) and concludes that, overall, the effect of non-CO2 emissions is warming and that their impact lasts for 10-20 years (Box 7.6.3, p.231) The report also clarifies that “demand management is the most effective approach to limit warming impacts from non-CO2 effects” (Box 7.6.3). These matters are immediately relevant (ie they do not depend for their relevance on the government accepting the CCC’s advice on the level at which to set the Seventh Carbon Budget).
5. As CAGNE has pointed out throughout the Examination,² the Applicant has refused to provide the Examining Authority with any information on non-CO2 emissions. Plainly, the CCC’s change in position and its treatment of non-CO2 emissions as capable of assessment and relevant to decision-making, is

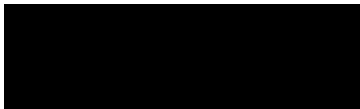
¹ [The Seventh Carbon Budget](#)

² See by way of example paragraphs 55-56 of CAGNE’s Closing Submissions [\[REP 9-223\]](#)

immediately relevant to this application, whether or not the 7CB is adopted as recommended. The recommendations in the report supports CAGNE's position that non-co2 emissions should not be ignored by decision makers considering airport expansion proposals which will have the effect of increasing demand and thus increasing warming impacts from non-co2 emissions.

6. This is a very clear example of the relevance of the 7CB report. CAGNE has urgently brought it to the Secretary of State's attention. There may be more relevant matters and the focus on non-CO2 emissions should not be taken as an inference that they are the only relevant matter. The Secretary of State should consider the whole Report very carefully and take it into account before making her decision, including, if necessary, calling for submissions on the 7CB report from the parties.
7. The 7CB Report is in its entirety relevant material that the Secretary of State should consider before determining this Application. Please confirm that the 7CB Report will be taken into account before any decision is reached.

Yours faithfully

A solid black rectangular box used to redact the signature of Leigh Day.

Leigh Day