

## **CAGNE response to the Gatwick Airport summer consultation for a 2<sup>nd</sup> runway – July 2022**



The Gatwick Airport consultation this summer (2022), to rebuild the emergency runway as a second runway, focuses on the new roads to deal with the traffic that Gatwick 2 hopes to attract. It also looks to clarify on the car park spaces and the incinerator location.

The first consultation of the DCO process, in the autumn of 2021, was deficient; it was found to be poor and complex, actively preventing residents from participating.

**Gatwick seeks an increase to 75.6m passengers a year by 2038 and 80.2m by 2047** (from 46.6m pre-Covid) plus workers and freight all trying to reach Gatwick Airport. According to the New Economics Foundation study, Gatwick's documents show that the proposed expansion would result in:

- 70% more passengers using Gatwick
- 35% more flights, increasing noise impacts

We find this summer consultation lacking in detail on many fronts, with wide-sweeping statements offering little, if any, reference to assist the reader to participate in the sections/ topics mentioned. We highlight the lack of transparency in -

- The onus placed by Gatwick solely upon Government, to deal with emissions from aircraft operations at Gatwick, while seeking significant financial gain, is found to be very disagreeable. The airport owners offer nothing on a voluntary basis to attempt to meet Net Zero, or reflective of the recommendations by the Government body, the Committee on Climate Change. This suggests that Gatwick is blinkered to the climate crisis the world is facing, thinking it does not affect them, unlike other industrial sectors.
- The statement '*no new flightpaths would be created as a result of the project*' is disingenuous at the least, due to GAL progressing the FASIS process.
- No mandate to progress noise envelopes, as well as not explaining how the reader can access/ participate
- Misleading residents with advertising campaign for the summer consultation.
- Not in keeping with Government policy
- The NMB is offered as a community forum, yet fails to disclose any points of contact or the geographical deficiency, being biased towards set airspace concerns and one noise group

- The lack of carbon emission and air quality data on the construction of a new runway, the vast associated infrastructure that would be required, and the construction of the new roads.
- The lack of additional planning and carbon emission data for buildings outside of the Gatwick's governance for hotels, offices, etc, that may be outside of the airport's designated operational land/boundary.
- The lack of inclusion of the Environment Act on air quality from the runway and surrounding roads.

## Nothing has changed

The independent Airports Commission examined the scale and timing of any requirement for additional runway capacity in the southeast, publishing its final report in July 2015<sup>i</sup>. This unanimously concluded that the proposal for a new Northwest runway at Heathrow presented the strongest case to meet the need it had confirmed for additional capacity in the southeast.

GAL was found to have a lack of work force; a lack of infrastructure; lack of freight; and little airline support.

This confirmed the Government's position that (para. 2.32) *"there is clear and strong evidence that there is a need to increase capacity in the South East of England by 2030 by constructing one new runway"* and identified that the Northwest Runway at Heathrow is the Government's preferred scheme.

Nothing has changed from this, in fact there are more airports that are currently ahead of Gatwick Airport in seeking to use policy to expand. We see no evidence that GAL has included their carbon emissions and that of Heathrow, in any evidence provided to justify expansion at Gatwick Airport by rebuilding the emergency runway as a 2<sup>nd</sup> runway.

Also published in June 2018, in the document "Beyond the Horizon: The Future of UK Aviation: Making best use of existing runways"<sup>ii</sup>:

2.2.7 "Beyond the Horizon", para 1.29, therefore states clearly that *"the Government is supportive of airports beyond Heathrow making best use of their existing runways"*.

It is clear from the poor and complex consultation in the autumn of 2021 that Gatwick's plans do not fall within this policy, as they seek to rebuild the emergency runway as a new runway some 12m north of its existing position. This is because the rebuilt runway is not currently "existing", and both existing runways are not able to be used concurrently on a regular basis, as now sought via the DCO. Accordingly, there is no sound policy basis to support GAL's proposals.

Gatwick itself has boasted for years that it is 'the busiest single runway in the world'. This admits that it did not have 2 operating runways. The "existing" 2<sup>nd</sup> runway has

always been the “emergency runway” used for emergencies from the runway 1, as a taxiway, or when the main runway was closed. And yet residents are being falsely advertised to that they have 2 runways already that they can use concurrently. This is false details being fed via a national advertising campaign and consultations.

The “Beyond the Horizon” document is also felt to be out-of-date, as much has since been stated by Government and the Committee on Climate Change (CCC) to seek to tackle global warming by meeting Net Zero by 2050.

On this, we raise the fact that the High Court has found that the Government’s strategy for getting to Net Zero is inadequate and unlawful, following a successful legal challenge brought by Good Law Project, Client Earth and Friends of the Earth 19<sup>th</sup> July 2022.

The Climate Change Act requires the Government to reach Net Zero by 2050, to make proposals for how it will meet that target, and to place a report before Parliament.

In a detailed judgement and order published on 19<sup>th</sup> July, amid the UK’s first ever red alert for extreme heat, the High Court held that the proposals for achieving Net Zero approved by the Secretary of State were too vague to enable him to be satisfied that the statutory targets would be met. And that the report placed before Parliament lacked the specificity necessary to meet the Secretary of State’s duty to inform Parliament and the public of his plans. <sup>iii</sup>

CAGNE now expect and support similar legal action to be taken over the poor Net Zero announcement by Government, also on 19<sup>th</sup> July 2022.

## **Climate Crisis – adding fuel to the fire**

A 2<sup>nd</sup> runway would add over 1 million tonnes of extra carbon a year to the atmosphere, plus other greenhouse gases, soot, and vapours. Gatwick continues to ignore this pollution in its consultation.

The CCC stated that there should be **no net capacity expansion at UK airports** ‘*unless the sector is on track to sufficiently outperform its net emissions trajectory and can accommodate the additional demand*’. This means that there needs to be significant progress towards **reducing emissions** from the flights already in the skies above the UK, before any new capacity is added, with an inevitable increase in emissions.

CCC went on to recommend a change in the planning assumption target for aviation, in order to meet the Balanced Net Zero pathway by 2050.

CAGNE see no evidence from the current consultation that GAL has improved upon its autumn consultation, where they ignored the emissions from arriving and departing planes.

We see no evidence of planes being flown on alternative fuels to fossil fuel. And no provision for storage for such fuels, on the tight airfield, suggesting it would have to

be transported to the airport, further adding to pollution and congestion. These movements figures are not included in forecasts.

We also see no evidence of addressing the emissions from the construction of a new runway, as well as the major new road infrastructure at Gatwick, new hotels, offices, sewage plant (this is still indicated as being potentially required, but no funding offered by GAL), and car parks.

CAGNE continues to raise concern about the amount of extra land that would be required to accommodate the new hotels and offices that Gatwick mentions, these being away from the terminals. Ref 3.5.4 BOC has decided not to expand and yet the consultation is proposing 3,350 beds needed with 2 new hotels and now one new office block, when offices stand empty in Crawley town which needs shoppers to fund the high street.

GAL should have to go through separate planning for hotels, car parks, etc, not being operated by them, with specifics for carbon emissions from construction, operation and traffic increases.

## **Gatwick carbon claims**

**Pg 2** 1.1.7 *The Project also includes new commitments to a noise envelope, a Carbon Action Plan, a sustainable transport strategy and biodiversity enhancements.*

We respond to the Carbon Action Plan -

The GAL climate section is unsurprising. Section 3.8.7 reiterates that the Carbon Action Plan will only cover GAL's scope 1 and 2 emissions. The proposed scheme would generate in excess of one million tonnes of CO<sub>2</sub> from aircraft when it is used. These scope 3 emissions ought to be taken into account in order to satisfy environmental impact assessment legislation. Moreover, GAL ought to assess the cumulative impact of the carbon emissions from expansion at Gatwick along with expansion at other regional airports.

The temporary carbon tax on flights is insignificant and does not reflect the damage being done to the planet by flying on fossil fuel. The 10% required by Government through Jet Zero is not going to make much difference to the greenhouse gas pollution from the airfield.

We face a climate emergency and these plans by Gatwick Airport fly in the face of this.

- A near 50% increase in CO<sub>2</sub> emissions attributable to the airport, with Gatwick alone projected to generate 5.5% of **all** UK CO<sub>2</sub> emissions by 2038.
- A 40% increase in passengers travelling to the airport by car, causing congestion and air quality issues.

## **GAL is not responsible for the emissions it profits from**

The new runway will cause significant taxiing and waiting of planes before departing, which will add to the emissions from the airfield as well as ground noise.

Sections 3.8.8 – 3.8.10 transfer all responsibility for limiting aircraft emissions to the Government, claiming that Jet Zero shows different scenarios for how Net Zero aviation by 2050 may possibly be met. See above points.

GAL's confidence in Jet Zero isn't shared by many experts, including the AEF report commissioned from Element Energy <sup>iv</sup> and the recent Progress Report to Parliament by the Climate Change Committee (summarised in a Twitter thread <sup>v</sup>).

CAGNE do not believe it's valid for GAL to indicate that emissions are solely a matter for Government. Jet Zero says expansion is supported (a position that we do not agree with), but the Government is clear that expansion of any airport **must** meet its climate change obligations to be able to proceed. Jet Zero presents scenarios which the DfT accepts have a high degree of uncertainty – it is not a formal assessment of emissions. As such, GAL should more fully address how they are to reduce emissions, so as not to breach the aim of Net Zero by 2050, as it would be in addition to Heathrow and all other airports mentioned in the southeast and the UK.

3.8.12 is right in mentioning that Government has included projected capacity increases at UK airports in its modelling, but the statement in 3.8.14 goes further, suggesting *“The NRP is not only consistent with this work, therefore, it is assumed as part of it”*. That statement gives too much weight to the Jet Zero modelling. Jet Zero makes it clear that *“The capacity assumptions required by the model do not pre-judge the outcome of any future planning applications, including decisions taken by Ministers.”* They are included as a sensitivity test only.

## **No Need for G2**

Gatwick is struggling to run and staff a one-runway airport, so we see no reason to allow it to grow with a new runway (having rebuilt the emergency runway).

Gatwick has for many years declared, and boasted, that it was the single busiest <sup>vi</sup> runway in the world and yet it has looked to mislead residents through its advertising campaigning claiming it has two runways that exist already.

To expand Gatwick would also go against the Government's regional levelling-up agenda, as it would be allowing yet another London airport to expand, in addition to Heathrow, Stansted, Luton, Southend and City.

GAL has been the worst performing airport in Europe during both COVID and the COVID-recovery period.

GAL has been the worst hit by cancellations of flights, post-COVID.

GAL continues to struggle to find staff. The CEO of Gatwick Airport said at GATCOM (21st July) that they are struggling to fill job vacancies.

Gatwick has always struggled to fulfil jobs, and this has not changed. (Ref 3.10.22) They now look for workers in far-reaching areas from where they cannot cycle or walk to work, as proposed by Gatwick 2.

Car-sharing schemes for workers, as anyone knows with school runs, are good incentives but do not work long-term.

With the salaries offered for most jobs, workers struggle to buy or rent a house close enough to the airport to walk or cycle.

Gatwick is recognised to be reducing jobs through automation (baggage handlers, air traffic control, check-in), so the promise of new jobs is not what it seems.

Construction of a new runway and road systems will cause years of congestion and heavy lorry movements, as well as the import of construction staff.

## **Impact on nature**

The CBC Local Plan Airport Boundary does not include countryside that is currently in the ownership of GAL, situated to the south east of the airport. This area is subject to environmental designations, including an area of Ancient Woodland, and Local Plan designations, including a Biodiversity Opportunity Area and Local Wildlife Site. Incorporating this area within the Airport Boundary would mean it would become an on-airport location. This is particularly relevant, given the significant new area of surface parking the Master Plan 2019 identifies in this location, as well as the decking of existing parking proposed adjacent to the Ancient Woodland.

All proposed new on-airport parking, taxiways and runway (with the 2<sup>nd</sup> runway) should be achieved through intensifying the use of existing surface of operational land, not new land to be brought within the airport boundary. Any development outside of this operational land would be deemed as expanding outwards on this land, impacting the biodiversity value that it currently holds.

Ecological areas – Nature does not take kindly to being moved. Man-made areas of green space do not sufficiently replace the biodiversity destroyed by building a new runway and highways.

## **Impact on communities**

The Government makes it clear (para 1.22) that *“The government recognises the impact on communities living near airports and understands their concerns over local environmental issues, particularly noise, air quality and surface access. As airports look to make the best use of their existing runways, it is important that communities surrounding those airports share in the economic benefits of this, and that adverse impacts such as noise are mitigated where possible”*. It expects the majority of local

environmental concerns to be taken into account as part of the consideration of planning applications.

We see no evidence of this; in fact, we see GAL hurriedly pushing through a scheme that does not seem to offer communities any assurances of legally-binding noise limits.

Communities do not accept the funding of charities or village halls as “sharing the economic benefits of growth”.

2.2.8 The Government’s Aviation Strategy, “Aviation 2050; The Future of UK Aviation” <sup>vii</sup>. This strategy supports the growth of aviation and the benefits this would deliver, but recognises that *“its growth must be sustainable – with affected communities supported and the environment protected”* (Section 3). Para 3.3 recognises that *“Growth can have significant environmental impacts which affect local communities and increase emissions.”*

The revenues must be earmarked for those who suffer the most, not to build a village hall or fund a charity. For example, in the Netherlands they calculate the cost of insulating homes well (including ceilings and doors) and apply the charge to recover costs.

The proposed new road scheme only benefits GAL, so much of the congestion will fall to residential roads and lanes, as it does today, but with the added burden of freight and fuel movements.

GAL seem to ignore the new Environment Act, that includes air quality as a major consideration. Gatwick already has a problem with the small PM2.5 particles that are produced by aircraft tyres and roads. And we see no mention of construction pollutants in the GAL submission. We offer the additional evidence of the GATCOM report from Reigate and Bansted Council July 2022 <sup>viii</sup>.

The air quality impacts of airport expansion could be profound. According to the 2019 European Aviation Environmental Report, aircraft emit particulate matter (PM), nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOCs). Some of these chemicals transform in the atmosphere, in turn producing other pollutants such as secondary particulate matter and ground-level ozone.

**As reported by Dr Gary Fuller, the pollutants from the airfield are significant (13<sup>th</sup> February 2022): ‘*The number of ultrafine particles 500 metres downwind of Gatwick Airport was greater than those at the kerb of London’s busiest roads*’**

He writes: *‘Ultrafine particles are not just a problem in the skies above us. Airports are a large source, and my latest research has been searching for these tiny particles close to Gatwick. They were not hard to find. The number of ultrafine particles 500 metres downwind of the airport was greater than those at the kerb of London’s busiest roads. They mostly came from aircraft during take-off and landing, but traffic, car parks and a large catering facility used to cook airline food all added to the problem.’*

**Climate policies are up to 50% more effective when they account for air pollution improvements, according to a new paper published by the Clean Air Fund and Dalberg Advisors.** Outdoor air pollution causes over 4.2 million deaths every year – more than malaria, tuberculosis and HIV/AIDS combined. <sup>ix</sup>

Fossil-fuel combustion accounts for about two-thirds of human exposure to such air pollution and is also the main driver of climate change.

However, the report states that decision-makers too often address them separately and overlook the co-benefits of joined-up action – this is clear in the Gatwick papers.

Factoring in wider savings on healthcare, economic productivity and inequality reduction from tackling air pollution, when deciding climate policies, can support bolder, faster action on air pollution and climate change.

The document on cargo (freight) at the Heathrow hub concerning pollution is key for residents and local authorities concerned about Gatwick's plans for 2 runways, as it says, *"Although freight vehicle trips represent only circa 6% of all Heathrow-related vehicle trips, **they are estimated to generate around 36% of vehicle-related emissions**...While some of this freight activity is associated directly with airport operations, for example through catering deliveries for flights or the removal of waste, the majority of freight trips are **associated with the movement of cargo in and out of the airport.**"*

No additional initiatives by Gatwick are seen to be tackling air quality and climate change, beyond what is required.

As local authorities are aware, the new guidance on WHO air quality does not seem to have been factored into Gatwick's plans or considerations.

## **New runway equals more noise, states GAL**

Policy offers: *"to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise as part of a policy of sharing benefits of noise reduction with industry in support of sustainable development."* It also introduces a new objective to *"limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise."*

PIER section 14.6 (figures 14.6.1 and 14.6.2) offers 136.0km<sup>2</sup> as a baseline, with a 16hr daytime increase of noise contour for 2032, to 146.7km<sup>2</sup>. This is a clear increase in those exposed to daytime noise, with 2 runways.

The Noise Envelopes process is not a tick-box exercise, as being witnessed by the process being operated by GAL. The autumn 2021 consultation states that the noise will be the same as 2019 by 2038 with 2 runways, if not less.

- *NPS - The lifespan of an envelope must be agreed, and its parameters defined to maintain appropriate sharing of the benefits over its intended lifespan.*

The CAA states -

- *The benefits of future technological improvements must be shared fairly between industry and local communities*

GAL Noise Envelopes (NE) should offer assurances to communities about the noise that can be expected, and going forward with FASIS. As such, CAGNE finds –

- Gatwick has not entered into the spirit of the CAA CAP1129 document, to balance growth with community concerns and impacts. And we do not believe the owners, sponsors of the DCO, are aware of the process and the noise issues GAL has currently.
- Gatwick do not have a mandate to formalise this subject further, due to the complex consultation and poor engagement for the DCO conducted by them in autumn 2021.
- We find the process deficient in instilling confidence if GAL was to secure the DCO, about what noise communities can expect to endure.
- Lack of detail in the current summer consultation, with no information of how residents can engage, obtain greater understanding, or contact community representatives.
- Reference to the NMB as a community forum – the continued usage of this geographically-biased forum of community representatives is concerning.
- The chair of NE group's lack of transparency in not sharing all details with all participants and not being independent of Gatwick plc. And no acknowledgment by the NE chair of the CAGNE papers or circulation.
- The chair's suggestion of secrecy to be undertaken, with a session to enable open discussion. CAGNE strongly opposed this due to elected members being party to the meetings, who are guided by local authority FOI action, and that other noise groups have undertaken changes to airspace without being transparent, leaving their communities at a disadvantage. See the full CAGNE response to GAL NE.
- Lack of time being allowed by Gatwick to undertake the work of NE formalisation, unlike at other airports that have conducted such work.

CAGNE has consulted in open Zoom meetings with Luton and Heathrow community groups, extending an invitation to the CAGNE Aviation Town and Parish Council Forum.

- NE offer nothing to those who complain about aircraft noise now, in fact no cap on movements is offered, day or night. All that is offered is the hope that planes will get quieter, which would seem at odds to the fact that Government is seeking the aviation industry to invest in alternative, greener, fuels, not noise reduction.
- GAL offers no acceptance of noise outside of 45dB at night and 51dB in the day to be considered, as not required by government policy.
- The charging offered by GAL is at night, which may reduce plane numbers but is unlikely to have a noticeable effect, and in daytime we see no incentives to fly quieter planes. In fact, when Heathrow recently looked to reduce the number of

flights, Emirates refused. This is witness to the fact that airports have no control over airlines.

- GAL has a significant night issue, yet they could apply for additional capacity (quota) next year in the DfT consultation, as the industry tries to move away from movement numbers to quota of noise. As a result, communities could be woken more frequently with more planes, and more light pollution.
- Gatwick has not made clear that NE will only deal with noise from Gatwick, and not the totality of noise created by other London airports or green airspace.

If a NE is to be effective at GAL, it is essential that the majority of, if not all, stakeholders are in genuine agreement on the parameters used to define the envelope, the way in which it is enforced, and above all, about how growth of an airport can be controlled so that the noise aspect is sustainable. Without this agreement, the stakeholder(s) whose needs have not been appropriately met will have difficulty in engaging with the envelope and may continue to be, or become, objectionable.

## New Flight Paths for G2

**Pg 1** 1.1.5 *“We seek permission to bring the existing northern runway into routine operation. This runway is parallel to the main runway and is currently restricted under a planning condition for use as a standby/emergency runway. Routine use of the northern runway alongside the existing main runway would provide a dual runway operation at Gatwick Airport. **No new flight paths would be created as a result of the Project.**”*

Once again, the statement concerning FASIS is misleading residents that the work is limited, whereas the reality is that Gatwick has already set design principles, is at the later stages of CAP 1616 Stage 2 (building new flight paths with the removal of Noise Preferential Routes), and is seeking to bring arrivals over those closest to the runway at 5/6nm who have never before been overflowed by arrivals in such a vectoring manner.

*1.1.23 The FASI-South process is in its early stages and has yet to develop a short-list of airspace change options. We will continue to keep this process under review through the development of our DCO application and consider the potential effects of any proposed airspace changes should the scope of these become clear ahead of the DCO submission.*

CAGNE says: *“It is clear that Gatwick are misleading residents – on one hand they seek to assure residents that there will be no new flight paths from a 2-runway airport (ref 1.15), while on the other hand Gatwick are in full knowledge of their plans for a new airspace for a 2-runway airport, that will include many concentrated flight paths over new areas”.*

**CAGNE wrote to Grant Shapps and the CEO of CAA** about the disingenuous statements and attitude of Gatwick management in seeking new flight paths from 2 runways via FASIS, whilst informing residents in the current consultation that ‘no new flight paths would be created as a result of the project’ (ref 1.115).

GAL continue to use FASIS to seek an illustration of a reduction of emissions whilst clearly seeking growth through FASIS. We find this to be contradictory and making false promises to the communities, both currently impacted and newly-impacted. They are seeking support for the new runway but misleading communities about flight paths and increases in movements – to lull those not currently overflowed into a false sense of ‘I’m not going to be affected by aircraft noise’, which is potentially untrue.

(Fig 7.8.1, 7.8.2, 7.8.3) We raise concern about the removal of Noise Preferential Routes with FASIS, as residents have bought homes in the full knowledge that they were not overflowed. To remove NPR and fly over new areas is seen as unfair to other residents and is not made clear by GAL in both consultations to date. Any impact on the property rights of those affected home-owners should be considered.

To find GAL to be at fault that they do not make clear that noise will increase with 2 runways and that the 2<sup>nd</sup> runway will not necessarily use the northern departure routes.

We highlight the Government guidance on noise - *Noise needs to be considered when development may create additional noise, or would be sensitive to the prevailing acoustic environment (including any anticipated changes to that environment from activities that are permitted but not yet commenced). When preparing plans, or taking decisions about new development, there may also be opportunities to make improvements to the acoustic environment. Good acoustic design needs to be considered early in the planning process to ensure that the most appropriate and cost-effective solutions are identified from the outset* <sup>x</sup>

## **Not Sustainable**

Most passengers at Gatwick travel between April and September, so the daily average addition of vehicle movements in the late spring and summer would be significantly high.

Gatwick has always struggled to fulfil jobs, and this has not changed. They now look for workers in far-reaching areas from where they cannot cycle or walk to work, as proposed by Gatwick 2. With the salaries offered for most jobs, workers struggle to buy or rent a house close enough to the airport to walk or cycle.

Gatwick is recognised to be reducing jobs through automation (baggage handlers, air traffic control, check-in), so the promise of new jobs is not what it seems.

Gatwick 2 presents a false economy to workers and residents. With recession and downturn of the economy, Gatwick Airport is hit the hardest due to its business model of leisure travel, over 80% flying to Europe, with EasyJet being its biggest airline customer that supported Heathrow expansion and not Gatwick’s 2<sup>nd</sup> runway. GAL is reliant upon EasyJet for nearly 90% of its business.

Crawley Borough Council has recognised this and is now looking to greener industries to bring jobs and stability to the county, rather than being too reliant on Gatwick Airport, which is seen as a volatile sector.

The cost of any greener fuel is estimated to be 3 times the current cost, once developed. The aviation industry admits that there is no silver bullet to an alternative fuel, so is set to continue burning fossil fuel for the foreseeable future.

The Government also sees this as a reason for fewer flights to be taken by the consumer, to reduce the impact of aviation on the planet. This, alongside the consideration of frequent flyer tax, tax on fuel and VAT (aviation exempt at present) and cost-of-living increases, reduces the number of people who can afford to fly for leisure.

Any assessment which takes into account the purported economic benefits of GAL's proposals must also take into account the disbenefits, otherwise any conclusion based on such unbalanced analysis will be unsound.

## **Cargo at Gatwick?**

Gatwick has high hopes of becoming a cargo hub. The Airport Commission found this was not a reality, as cargo would have to pass Heathrow and Stansted en-route to destinations; nothing has changed.

The fact is, as found during the Heathrow vs Gatwick Airport Commission research, cargo is not attracted to Gatwick. In January 2014, cargo decreased by 10% at Gatwick; its total was 0.04% of the cargo **out** of Heathrow.

Gatwick's expectations now need to be questioned, as the majority of Gatwick's business is from one short haul carrier, EasyJet. It is therefore difficult to equate Gatwick's claims of belly cargo, which relates to long-haul carriers.

The figures from the Gatwick cargo press release Oct 2021, from the recent Gatwick Airport publicity for rebuilding the emergency runway as a second runway <sup>xi</sup>, should be very worrying to local Crawley residents, authorities, or anyone who uses the only arterial road that Gatwick relies on, the M23 (smart road for natural growth in the Southeast, not for Gatwick with multiple runways). The cargo must travel by road, as there can be no freight trains at Gatwick, the line being almost at capacity with passenger trains.

**In 2018, cargo throughput at Gatwick was growing at about 25% per annum (Master Plan).**

Gatwick detail that cargo would increase to over 200,000 tonnes with a second runway. That would be the equivalent (using Government lorry carriage figures <sup>xii</sup>) of over 7,600 three-axle artic lorries. If we take the next figure of 320,000 tonnes of cargo by 2038, that could be nearly 12,800 three-axle rigid lorries on the roads. And the last figure is even more frightening, as Gatwick proudly announces 350,000 tonnes of cargo by 2047, which could add over 46,600 seven-and-a-half tonne lorries a year, in addition to the predicted 80.2m passengers.

The traffic forecasts for Gatwick Airport's plans to rebuild the emergency runway as a second runway do not include such vast increases in lorry traffic to and from the

airport, nor do they allow for the natural growth of traffic in the Southeast that will all be seeking to use the same single road, the unsafe smart motorway.

In 2021, Heathrow had 2039 cargo flights, Stansted 869, and Gatwick none. If Gatwick is successful in attracting cargo, and it's a big IF, then the planes will fly lower when taking off and landing, due to their weight. Gatwick already admit that Emirates planes do not adhere to noise abatement procedures (as they operate their own efficiency settings for landing), which inevitably leads to greater noise for local communities.

Gatwick is a leisure European airport – it does not witness the larger planes that carry freight in their belly. We therefore see no evidence that Gatwick will become a major freight airport, as proposed by GAL.

## **Transport and alternative fuels**

Cars, planes, and lorries – Electric vehicles are drastically cleaner than conventional gasoline vehicles. However, there's a growing awareness that none of this heavy EV hardware comes without a carbon cost; there's no such thing as a "zero-emission vehicle," as they have been branded by policymakers and the like. Steel body panels don't grow on trees. Lithium doesn't just flow out of the ground and into battery plants. And electricity — even the stuff coming from solar panels — isn't captured without a great deal of carbon expense.

- Much of the electric vehicle carbon footprint comes from its manufacturing, especially the construction of the battery. This applies to the airside vehicles that we believe Gatwick use to pursue carbon-neutral claims, whilst not accounting for the plane movements.
- While there are existing methods to store and transport hydrogen, they can be prohibitively expensive, especially compared to moving around its carbonaceous cousin, natural gas. H2SITE says that transporting hydrogen could cost as much as three times the cost of the hydrogen production.
- Jet Zero only requires 10% of SAF fuel to be added to fossil fuel planes. This is wholly unacceptable and should be reason to prevent growth of this airport at this time.

We see no evidence of how this fuel will arrive at GAL or where it will be held.

The emissions from the relocation of the Gatwick incinerator (as identified in the December 2021 consultation) are not included in the full picture of the emissions from a 2-runway airport, neither is the question of whether the incinerator needs to grow to accommodate G2.

## **Car Parks**

Since the pandemic, the attitudes of travellers have changed and they do not wish to arrive by rail or bus laden with luggage, preferring to arrive by private car.

We see no evidence of how GAL will stop cars from being parked on residential roads due to the parking costs and drop off charges.

Car park requirements in the autumn consultation seemed at odds with the GAL statement that passengers and workers will use public transport. Ref 3.3 and 3.2.6 significant new car parking capacity (to 18,595), while GAL state that they aspire to 60% of passengers travelling by public transport, walking, or cycling. They may propose charging points for electric cars, but they do not account for the emissions from other cars and the congestions caused.

The reduction in car parking spaces is to be welcomed but we do not believe GAL will reach the target of 60% car-free, as passengers and workers prefer the ease of driving. Trains are expensive and buses do not run to rural locations at the time of flights, or regularly enough to make them a sensible form of transport. GAL can always re-apply for additional car parking space, thus raising concerns of planning to come, on green field sites.

Even public transport has a carbon footprint and adds small particles from tyres to the atmosphere, so further decreasing the air quality.

GAL has previously failed to force airport staff to use buses. With bus operators struggling to fund the current vehicles, we see no evidence of new greener buses being offered by operators or local authorities, or to rural locations where workers live.

## Road and Rail

We see no evidence of the 'polluter pays' principle in this consultation, as much will fall to the taxpayer to meet, with the huge increases in passenger, workers, and freight transport.

The polluter **must** pay, as section 106 agreements do not cover the full cost of GAL's operations on local roads.

A Western Link Road is badly needed, due to the congestion caused by Gatwick Airport. We see with the proposed Ifield development that no offer of a full road is made, only a slip road. It is felt that as the major burden to Crawley is Gatwick Airport, then this should be financed by Gatwick Airport as they push ahead with the DCO to rebuild the emergency runway as a second runway.

This is also mentioned in the Transport for South East, but does not clarify funding other than by the taxpayer. The polluter should pay, so Gatwick Airport should bear the burden of a new bypass, to take the emissions away from residential roads.

The new housing development does not offer this, only a slip road with pedestrian path, bike path, and bus lane through the first stage of the residential properties. This is totally unacceptable, as Gatwick is looking for huge increases in passenger numbers, and vehicle movements of both cars and freight.

History has witnessed, and continues to see, emissions around nearby homes due to GAL's operations, day and night. We see no funding to address these, only to monitor. (GATCOM July 2022 Reigate and Bansted council)

- Gatwick Airport make much of their single arterial road, the M23, that joins Europe's worst car park, the M25. But we see no offer to address the impact that G2 will have on new developments at Kilnwood Vale, Pease Pottage and North Horsham, and from potential future developments on the western side of Crawley.

The increased traffic on arterial routes undoubtedly has a negative effect on virtually all the other roads in the locale. This includes rural roads and any number of so-called 'rat runs'. The M23 has been rated the second worst motorway in England in Transport Focus research covering the year to March 2020.

The return to public transport has been slow, post-Covid, so more flyers and workers are using the roads to access Gatwick. With the recurrent increase in Covid (July 2022) we raise concern that the Gatwick predictions are out-of-date with the current concerns over using public transport.

Gatwick Airport is part of a larger profile. Most passengers at Gatwick travel between April and September, so by 2022/3 the daily average addition of vehicle movements in the late spring and summer would be significantly higher. In passing, those months are by far the busiest on the M23 on account of its direct link to the popular south coast. As such, Gatwick causes a seismic increase in congestion to the network when it is already under strain from locally-generated traffic. The fashion of "staycations", in residents finding the attraction of the coastal regions, may have indeed increased the traffic further.

These projections are without GAL being permitted to use the emergency runway as a 2<sup>nd</sup> runway – growth from the main runway simultaneously must raise further concerns.

Regardless of Gatwick, a population increase of more than 10 million by 2041 is not a rosy prospect for anyone living in these regions and travelling by road or rail. Additional pressure from 2 runways at Gatwick would surely be a step too far, and less than sensible for a system which is already hugely stressed. To put flesh on these bones, according to Inrix, Inc.'s annual Global Traffic Scorecard published in February 2019, drivers in the UK lost an average of 178 hours a year due to congestion, costing them £7.9 billion, an average of £1,317 per driver (London figure £1,680).

- If Gatwick was successful in attracting freight, we can expect to see huge increase in freight carriers on our roads. UK domestic freight is mostly moved by **road (79%)**; the remainder is by shipping (13%) and rail (9%).<sup>xiii</sup>

Van traffic has doubled since the early 1990s, and emissions have increased by 67%.

Without a fundamental redesign of trucks with electric drivetrains, the size and weight of the batteries required for trucks driving long distances, has meant that some net-zero pathways limit battery electrification, with some HGV concepts being based on electrified overhead line.

- The railway improvements (ref 3.3.3 and 3.3.13) are not currently funded by Government, yet Gatwick is seeking to use as a method of taking staff and flyers off the roads. (ref 3.3.16). The Windmill Junction improvements were originally funded to meet the needs of growth in the southeast and not for Gatwick 1, 2 or 3 runways.

Whether the rail services could cope comfortably with this influx is a matter for debate, despite recent improvements in the services from London to Brighton. For our roads the chance of a smooth delivery looks questionable at best. Rail fares are far higher than driving to the airport.

The new railway station at Gatwick funded by taxpayers; Gatwick prohibits usage due to the £5 drop off charge which has pushed passengers away from Gatwick Airport to stations in other locations that do not have the car parking facilities. It also pushes the emissions away from the airport to more local residential roads.

## Runways 1, 2 and 3

The Aviation Strategy states in para 3.66, *“Several airports safeguard land for future developments. CAGNE is still very concerned that this move by GAL to secure a 2<sup>nd</sup> runway by the backdoor is in addition to a 3<sup>rd</sup> runway for which they were turned down in favour of Heathrow. This land should therefore be released to alleviate the pressure on Crawley Borough Council and Horsham District Council to find land for housing.”*

The Gatwick Airport Master Plan (July 2019) <sup>xiv</sup>, through its Scenario 1, anticipates that capacity on its single runway could increase to between 58 and 61 million passengers per annum by 2032/33 (from the FASIS process). The Master Plan sets out two further scenarios for growth of the airport; through rebuilding the emergency runway as a 2<sup>nd</sup> runway (Scenario 2), and through continuing to safeguard land for an additional runway to the south of the airport (Scenario 3).

This would increase capacity of the airport to over 70mmpa. Growth as per Scenario 2 (for G2) will require new development at the Airport and is the subject of an ongoing Development Consent Order application.

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