

PARISH COUNCIL RESPONSE TO GATWICK PROPOSALS

The Parish council would like to object in the strongest terms to the recent proposals laid out by Gatwick Airport to use the current emergency runway in order to increase capacity at the airport.

For the following reasons (summarised first and then explained below)

1. The consultation is not fit for purpose
2. The investigation and report on noise and its effects on Penshurst and Fordcombe are misleading, flawed and contrary to government guidelines
3. The economic effect of the proposed expansion of use is flawed and uses highly questionable assumptions. There is a distinct possibility that economic benefits claimed are illusory.
4. The provision of infrastructure assumed in the scheme will not go nearly far enough to alleviate the effects of additional capacity and growth (if such growth were actually to occur)
5. The additional CO2 emissions caused by this expansion would lead to the airport being a significant UK polluter.

The consultation is not fit for purpose.

The consultation document gives an erroneous and misleading impression of the need for the development

The document uses projections that are not consistent with the Airports National Policy Statement. The Airports National Policy Statement requires airports (other than Heathrow) that are seeking to expand to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow. Gatwick has not done so.

The investigation and report on noise and its effects on Penshurst and Fordcombe are misleading, flawed and contrary to government guidelines

By, inter alia, using average noise levels the airport has provided a misleading and useless metric on which to base future proposals. Gatwick's noise envelope proposals are wholly one-sided, use inappropriate metrics and limits, do not comply with government policy, lack adequate enforcement arrangements and have been put forward without stakeholder discussion, in contrast to CAA guidance and the approach taken by other airports.

It is quite obvious to anyone living under the approach to Gatwick that the correct dynamic measure of noise to use must be the peak of each plane as it passes over. If capacity rises by 35% this will rise by 35% as well. Averaging out over the working day is misleading in the very least, bordering on dishonest. Of particular importance to Penshurst and Fordcombe is the lack of further clarity over the agreements reached previously to fair and equitable dispersal of planes on their approach to the airport.

The economic effect of the proposed expansion of use is flawed and employs highly questionable assumptions. There is a distinct possibility that economic benefits claimed are illusory.

The document contains material errors and omissions in its economic analysis. Gatwick's assessment of the economic benefits and costs of the proposed project is based on unsupportable or out of date assumptions, together with omissions and errors. For instance, and contrary to govt guidelines, it ignores the effect of the third runway at Heathrow on airport use elsewhere (particularly important in the case of the other London Airports). Using a more realistic and correct set of assumptions demonstrates clearly that the project is unlikely to provide significant if any benefit to the UK. Furthermore, even the analysis carried out by its consultant, Oxera, shows that the project is not expected to result in material net job creation at the national level.

The provision of infrastructure assumed in the scheme will not go nearly far enough to alleviate the effects of additional capacity and growth (if such growth were actually to occur)

If for a moment we believe the over optimistic and flawed projections contained in the Consultation document, it is clear that the plans for infrastructure development are nowhere near enough to cope with the added capacity, both in terms of transport (which in any case should be restricted for environmental reasons to public transport rather than cars) and employee associated infrastructure such as housing. Gatwick's proposed sustainable transport target is inadequate misleading and

unacceptable. for instance, the increase in passenger numbers the airport is seeking far outweighs the proposed increase in sustainable transport use. The airport's proposals would therefore result in a steady and substantial increase in car travel to the airport, with total passengers arriving by car in 2047- over 40% higher than in 2019. Infrastructure associated with this would add considerably to the cost side of the cost/benefit analysis.

The environmental damage caused by this project and in particular the additional CO₂ emissions caused by this expansion would lead to the airport being a significant UK polluter.

The growth Gatwick is proposing would increase CO₂ emissions attributable to the airport by nearly 50%. Its emissions would grow from less than 1% of total UK emissions in 2018 to over 5.5% in 2038. An increase in emissions of this (or any) scale would plainly have a material impact on the UK's ability to meet its carbon reduction targets and is therefore inconsistent with the Airports National Policy Statement.

The airport has been unable to put forward credible plans for mitigating its projected emissions because there are currently no proven technologies for reducing commercial aviation CO₂ emissions at scale. Its expansion proposals are therefore inconsistent with government's policy requirement that the aviation sector must "make a significant and cost-effective contribution towards reducing global emissions" and with the Transport Decarbonisation Plan commitment to achieving net zero aviation by 2050.

The Environment Bill requires development to have an overall positive impact on biodiversity and the environment. It is not clear how expansion of Gatwick Airport, with a 35% increase in flights, additional land-take and wider impacts can have such a positive impact.

The development will increase air pollution and noise impacts on sensitive habitats around the airport. In addition, the land take required for bio fuels for future flights will also have impacts on biodiversity and ecology that would be attributable to Gatwick's expansion plans. This is unacceptable.

For and on behalf of

Penshurst and Fordcombe Parish Council