



The countryside charity
Sussex

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Gatwick Airport Northern Runway Consultation
By email

30th November 2021

Dear Sir/Madam

CONSULTATION ON EXPANDING “NORTHERN RUNWAY” AND ASSOCIATED INFRASTRUCTURE CAPACITY IN AND AROUND GATWICK AIRPORT

This is the formal response of CPRE Sussex – the Sussex Countryside Charity - to the proposals set out in your various consultation documents under the broad heading of “Northern Runway Public Consultation”. CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. Thank you for the opportunity to comment on these proposals which will affect many parts of Sussex.

Climate Change and other matters linked to atmospheric impacts

We are keen, as you yourselves state you are, to see the government’s net zero emissions target reached so that the serious impacts of climate change on the UK are prevented and, where these are already in train, adapted to. The government’s plans will also contribute to reducing impacts in other parts of the world which is just as well as, if greenhouse gas emissions are not restricted, there may be fewer overseas destinations that would be attractive to UK customers.

The proposals, as set out in the consultation, seem to us to represent a very substantial reworking of Gatwick airport, an increase in runway capacity, increased passenger and freight flights (some areas appearing to double over current levels) and inevitably more non-aircraft transport movements. It appears to us that you are not proposing upgrading an “existing” runway; your proposals involve rebuilding the airport to accommodate a new second runway. We feel this is a second runway because you are having to move the centre line and create new taxiways and new aircraft stands which constitute a considerable expansion of capacity (essentially it could be said this is effectively a third terminal at Gatwick, or at least the beginnings of that). It is difficult to see how, during the construction and operational phases, emissions and noise will not both increase when both need to decrease.

Although the proposals include comments on the aviation sector’s very general approaches to mitigating climate change they say little about how it will adapt or combine approaches to mitigation and adaptation. Further, there are no timelines for the introduction of new technologies that would reduce emissions (not surprising as the technologies do not yet exist in an

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operational sense) and thus the proposals are based on unverifiable assumptions about emissions. A development of the size proposed should not be based on such uncertain assumptions.

Overall, the climate change aspects of the proposals and associated assessments seem not to account for possible worst-case situations and seem predicated on working on average values instead of the extreme or more intense events that could undermine your business' operations with increasing frequency for a substantial part of the construction and operational periods.

We thus find ourselves opposed to your proposals as they stand at present on the basis of the evidence presented on emissions (and their mitigation) and because the assessments of atmospheric effects other than those linked to climate change are also limited and do not account for possible tightening of regulations on air quality or offer an assessment of impacts on valued habitats that are overflowed as part of operations linked to landing and take-off.

We are also opposed as the proposals involve time periods over which, globally, negative emission technologies may be required and the proposals seem silent on that.

Infrastructure and transport capacity on and off the airport

The highly significant expansion plans involve a substantial increase in the infrastructure required to support the additional movements of passengers, support vehicles and aircraft.

As in other parts of the proposals there are inconsistencies in relation to fact and ambition with respect to infrastructure. For example, there are very optimistic views about the use of more sustainable transport modes and likely flaws in the arguments presented on rail capacity, reflecting a lack of systems thinking.

We thus find ourselves opposed to your proposals as they stand at present on the basis of likely flaws and inconsistencies in the case presented.

Homes and employment

A number of Gatwick employees work at considerable distances from the airport and that fact, and the concept that employees could walk or cycle into the airport, especially in adverse weather conditions, surely calls into question planning here. Improvements to road infrastructure that are planned or have happened recently all make the airport attractive to less sustainable forms of transport (even if these are increasingly powered by renewables there will still be impacts on local and global resources). You yourselves recognise the issue because you say that "kiss and fly" trips should be discouraged. Many people will ask – what is the practical alternative?

It also seems likely that expansion plans will increase demands for new housing and associated infrastructure that it is increasingly hard to find space for without harm to valued landscapes or habitats. Our view is that account will need to be taken of such factors in decision-making. It is hard to treat expansion on this scale as an isolated development.

We find ourselves opposed to your proposals on the grounds that workforce transport and additional housing impacts together with those of the associated infrastructure has not been given sufficient weight in the consultation documents.

Noise and wellbeing

Aircraft noise is the basis of many complaints by local residents and mitigations offered by the proposals might be welcomed if they could be thought robust. However, they are called into question by the fact that the increase in freight traffic will likely use older noisier aircraft. This means overall noise from Gatwick may well not decrease and residents over wider areas will be subject to more noise not less. There is growing evidence that current noise levels harm wellbeing and thereby health and at least this should mean attitudes and approaches to noise by noise generating commercial sectors need revision downwards. Questions over the impacts on children's education and life experience must also be a consideration.

We find ourselves opposed to your proposals as they still seem to emphasise mitigating the noise from aircraft rather than greatly reducing it and because the assumptions that fleets will be modernised seem overly optimistic due to the lasting impacts of the pandemic on the development of your business sector which make it less attractive to investors.

Overall, it is our view that this is a strange time to bring forward expansion proposals in a commercial sector that faces reductions in one of its most lucrative markets – business and conference travel. New ways of working discovered during the pandemic are becoming the new norm as they are so much more efficient than flying people around the planet. In some ways travel for many types of work is outdated. The proposals are thus likely flawed in relation to the social and economic aspects simply because a substantial section of aviation customers have moved on. We are thus opposed to your proposals as they appear unsustainable on environment, economic and social grounds.

I am sure Gatwick has a future – we believe it is just not the one that is proposed. A radical re-think is required.

Yours faithfully,



Dan Osborn,
Chair CPRE Sussex

