



The countryside charity  
Sussex

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Stuart Wingate,  
CEO Gatwick Airport

By email to: [feedback@gatwickfutureplans.com](mailto:feedback@gatwickfutureplans.com)

27 July 2022

Dear Mr Wingate,

### **GATWICK EXPANSION – SUMMER 2022 CONSULTATION**

This is the formal response of CPRE Sussex – the Sussex Countryside Charity – to the Summer 2022 Consultation on Gatwick’s expansion plans. 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 the latest consultation documents covering transport matters for the most part.

CPRE Sussex is working with others on shaping a greener future for Sussex. On behalf of the thousands of our members and supporters in Sussex, we wish to raise a number of important concerns about the limited nature of the consultation, omissions of important information and inconsistencies within it. We do not believe this consultation will help win the Sussex public confidence in your proposals.

1. We are opposed in principle to Gatwick expansion because of the increased noise, greenhouse gas emissions, and the disruption and cost of accommodating transport to and from the airport. All these impacts will affect the health and wellbeing of Sussex residents. This is not adequately reflected in the consultation. Airports and their associated activities do not come without downsides to the local population.
2. We are deeply disappointed to see that if your proposals proceed even more land will be lost to construct extra road carriageways and bridges with impacts on public rights of way and biodiversity that are more severe than outlined in the previous consultation. More work is needed to minimise the impact. Trees felling must be minimised. Your proposals themselves say some of the works are for engineering convenience and this is not really good enough. Engineers can find work-arounds to keep trees and minimise

To promote, enhance and protect a thriving countryside for everyone’s benefit

President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

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land take. The fact that some trees are on the highway estate is irrelevant. They are still trees that capture carbon provide important ecosystem services and habitat for biodiversity.

3. The changes set out in this consultation seem designed to make it easier to travel to the airport ever more quickly by road and this runs counter to your statements (say para 2.3.2.1) that claim your proposals are not designed to do this and counter to your own proposals to provide less car parking places. We are also concerned that any active travel plans to be revealed in detail in the future will lead to even more land being lost to over-engineered cycleways of which there is increasing evidence throughout Sussex.
4. We note the huge increases in freight that you will be seeking to achieve. The problems Sussex will have with cars, trucks, and other vehicles delivering passengers and freight to an expanded airport will likely be more significant than you claim because you say yourselves that expanding the rail capacity is impossible unless, rather ominously for Sussex communities living on the railway, you can get more trains into empty off peak slots.
5. Impacts getting worse over the period your proposals are being developed seem to be something of a feature of this consultation (see examples in Table 2 and elsewhere). This is akin to the manner the emergency runway has become a relief runway and now a second runway. It is understandable that many residents in Sussex are questioning the motivation behind such shifts in language and the level of transparency involved. Many Sussex residents will be struggling to understand what will happen especially as the consultation is fairly silent on the fact that the emergency runway will need to be rebuilt to function as a second runway and alarmingly silent on the green-house gas emissions that will result from your operations and the additional noise that will be inflicted on residents throughout Sussex. If you are silent on these matters now, just a few months before going for development permission, then it seems your plans are not sufficiently well developed to pass muster. Your proposals are also silent on other matters, such as, air quality issues with which you are already struggling and which accumulating evidenced associates with wide spread public health impacts. Dr Gary Fuller of Imperial College London proved only this year that PM2.5 air particles, which are a particular hazard to residents around Gatwick, are directly from the airfield.
6. In our view, two runways will not be compliant with the new Environment Act which has to be a consideration by every part of government.
7. Your proposals rely heavily on Jet Zero and you say, in effect, that it is the government who say expansion will be fine and who are you to disagree. In addition, you seem to be claiming here that you are not responsible for the aircraft emissions your expansion plans enable. What is omitted is some clarity for the public on Jet Zero. Jet Zero is not a industry roadmap to a net zero future. It is very much a prospective set of documents that lack a convincing timeline or support for the necessary innovation.
8. CPRE Sussex feel you are still relying too much on technological developments that are not in any real prospect of practical deployment and on what is probably an unachievable degree of off-setting. The independent Climate Change Committee, which has a duty to advise government, published an independent assessment of the UK Net

Zero strategy last October which highlighted this overreliance on technology: “The Government does not address the role of diets or limiting the growth of aviation demand in reducing emissions, ... These options must be explored further to minimise delivery risks from an increased reliance on technology and to unlock wider co -benefits for improved health, reduced congestion, and increased well-being.”

9. CPRE Sussex hopes that any proposals you take forward will look at the full impact of expansion including emissions from construction and ongoing emissions from transport bringing passengers and freight to and from the airport as well as all take off, in flight and landing emissions. Greater clarity on the issues mentioned in this and earlier paragraphs will be needed in your proposals. We would expect that any new car parks, hotels, or offices being operated by others outside of the current Gatwick boundary of operations would require additional planning applications. This needs to be recognised in public consultations.

CPRE Sussex would like to know why a more straightforward and responsible approach to consultation and the proposals would not be more helpful? We would urge you to put off any proposals for expansion until you know what the full impacts are and how they can be minimised so that there is no prospect of harm to Sussex communities and their environment. Flying is very polluting activity and now is not the time to expand else you will find for example, the lower standards of flood protection you are going for will quite possibly be overtaken by events linked to climate change (for comparison: recent extreme heat exceeded the bounds of projections official bodies were making only a year ago).

It is a pity that so much of the information that needed to be in these proposals is missing. How can consultees respond properly on key issues such as noise and new flight paths when the information is simply not there? This was, sadly another poor set of consultation documents that deprived local communities of the opportunity to comment in full.

CPRE Sussex would be happy to discuss your proposals further, of course. The more transparency there is the better for all concerned, especially Sussex communities.

We will place a copy of this letter on the CPRE Sussex website which can be accessed by the members, supporters, the media and the public.

Yours sincerely,



Dan Osborn  
Chair, CPRE Sussex

