

## CPRE Sussex Registration Comments

CPRE Sussex is the charity which protects, celebrates and helps regenerate the beautiful, thriving Sussex countryside, to shape a greener future for us all. Part of the England-wide CPRE network, CPRE Sussex has over 2,000 members, volunteers and supporters.

CPRE Sussex objects to the application for the expansion of Gatwick on the following grounds:

1. The application proposes, in reality, a new Second Runway for Gatwick. This is contrary to the policies set out in the Airports National Policy Statement.

1a. The proposal is for Gatwick to have a new (un-instrumented) runway operating simultaneously with the existing runway that will rely on pilots' visual information and ATC inputs. At present Gatwick has only one fully instrumented functional runway and, as designed and built, an emergency or relief runway. This relief runway is misdescribed as the "northern runway" in the application. This is not a fully functional runway – if it were it would not need to be reconstructed.

1b. The proposal is inconsistent with the concept of 'Making Best Use of Existing Runways' because it amounts to building a wholly new runway for the South East of England when the Airports National Policy Statement makes clear the Government's position: any new runway should be at Heathrow, not Gatwick.

1c. This application, ahead of any potential new application from Heathrow, effectively seeks to 'jump the gun', and is in conflict with agreed policy and undermines it.

2. The proposal, if built, is unsustainable as it would Degrade the Quality of the Environment and thus have Harmful and Damaging impacts on the Countryside of Sussex and the Health and Wellbeing of the People of Sussex.

2a. The proposal's significantly increased numbers of commercial and freight flights will have unsustainable and damaging impacts on Sussex's countryside and people, because it:

2a(i) runs counter to efforts to tackle climate change and in particular jeopardises the UK's net zero ambition especially given the speculative nature of Jet Zero and CORSIA;

2a(ii) will increase exposure to noise and air pollution (where we support the views expressed by Communities Against Gatwick Noise Emissions, CAGNE) and reduce the tranquility and air quality of Sussex;

2a(iii) cause loss of, and damage or harm to habitats and biodiversity (where we support the views of the Sussex Wildlife Trust, SWT);

2a(iv) greatly increases airport passenger throughput without enhancing rail access options and only provides limited (and environmentally damaging) enhancements of the very local roads;

2a(v) requires a wholesale reconfiguration of Gatwick Airport (lasting about 14 years and only complete in 2038 at the earliest) with attendant long-term noise and light pollution from night working;

2a(vi) will likely further increase noise and air pollution because the limited space available for ground operations means more chance of aircraft being stacked over neighbouring areas or diverted at busy times.

3. Main References (exemplar list) - largely drawn from authoritative published sources (but including more topical material) that provide evidence supporting the above comments

Most relevant to Policy:

Dept of Transport (2018) Airports National Policy Statement: new runway capacity and infrastructure at airports in the south-east of England

HM Government (2018) Beyond the horizon: The future of UK aviation - making best use of existing runways (2018)

Dept of Transport (2022) Policy paper: Initial offsetting approach for CORSIA - statement of intent

Dept of Transport (2022) Jet Zero Strategy - Delivering net zero aviation by 2050

DELUHC (2023) National Planning Policy Framework (especially but not exclusively sections 14 and 15)

Royal Society (2023) Net zero aviation fuels: resource requirements and environmental impacts – policy briefing

Most relevant to Climate Change:

Climate Change Committee (2020) The Sixth Carbon Budget - The UK's path to Net Zero

Climate Change Committee (2020) Policies for the Sixth Carbon Budget and Net Zero

New Economics Foundation (2021) Turbulence Expected – and additional material as on the Foundations website

Connolly, K., Lockhart, N. and Perantakou, S. (2022) A tale of two carbon pricing schemes for aviation: the interplay between the EU/UK ETS and CORSIA. Oxford Institute for Energy Studies Forum: Issue 132 pp 24-31

## Climate Change Committee (2023) 2023 Progress Report to Parliament

Most relevant to Noise and Air Quality:

CPRE NAvG (2020) Flight Blight – the Social and Environmental Cost of Aviation Expansion

WHO Europe (2018) Environmental noise guidelines for the European Region

Tremper A.H. et. al, (2022) Sources of particle number concentration and noise near London Gatwick Airport. *Environment International*, 161, 107092 – with additional updated information as provided via CAGNE

Leylekian, L., Covrig, A. and Maximova, A. (eds.) (2022) *Aviation Noise Impact Management - Technologies, Regulations, and Societal Well-being in Europe*. Springer: Open Access

Various aspects:

The ES to the proposal itself.