



The countryside charity
Sussex

CPRE Sussex
Brownings Farm
Blackboys
East Sussex TN22 5HG
Telephone 01825 890975
info@cpresussex.org.uk
www.cpresussex.org.uk

By email to the Examining Authority

12 March 2024

Dear Sir/Madam,

Application by Gatwick Airport Limited for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project

Interested Party Reference number: 20044812 – Request for an Additional Specific Issue Hearing on Climate Change

This submission from CPRE Sussex is focused on the policy relating to Airport expansion in south-east England and in the UK more generally. We have not identified at this stage any parts of the applicant's documents with which we agree because we are challenging the policy basis of the whole application. We accept that the various policy documents identified by the applicant are indeed relevant to the case although we note the limited policy relevance of Jet Zero – we feel the Jet Zero strategy has more policy weight.

We will identify material with which we agree when it comes to any spoken and written submission around the Issue Specific Hearing on Climate Change which is where we will deal with matters related to current and future policy considerations linked to this issue. These will include both Jet Zero and the Jet Zero Strategy as well as the importance attached to meeting the Secretary of State's international obligations etc. They will also deal with matters relating to emissions and impacts of climate change mostly in terms covered by the wide range of matters addressed in the evidence base used by the Climate Change Committee and its Adaptation Committee in the independent views they provide to the UK Government(s).

Annex 1 presents our argument on matters related to aviation policy.

CPRE Sussex fully supports the points made at this stage by CAGNE on noise, air quality and surface transport. We have not repeated those arguments here.

Yours faithfully,

Dan Osborn,
Chair, CPRE Sussex

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

Annex 1

Application by Gatwick Airport Limited for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project

Interested Party Reference Number: 20044812 – Deadline 1 Written submission from CPRE Sussex on matters relating to UK Aviation policy and the application.

Summary

Gatwick is currently a single-runway airport. The applicant themselves make this clear in the opening sentence of the Executive Summary and p19 para 2.2.2 of their Planning Statement Book 7.1.

This application clearly seeks to create a new second runway that can be used simultaneously with the single existing runway. To do this entails progressively reshaping Gatwick Airport until 2038 to accommodate the new second runway and associated works. This goes well beyond the scope of making best use of existing infrastructure.

The applicant's proposal cuts across established policy (set out in the "important and relevant" Airports NPS) for any new runway in the south-east of England to be based at Heathrow. CPRE Sussex view this application as at best premature and at worst highly damaging.

Policy: the critical role of the Airports NPS

The Airports NPS is critical to determining this application. There is a long-term expectation (House of Commons Library, 2017) that development of Nationally Significant Infrastructures Projects (NSIPs) will be guided by National Policy Statements (NPSs) and examined via the Development Consent Order (DCO) process. NPSs are important in providing the framework for decision-making in the DCO process. For airport expansion the Airport NPS (2018), covers the south-east of England.

The Airports NPS makes clear that:

"It sets out planning policy in relation to applications for any airport nationally significant infrastructure project in the South East of England, and its policies will be important and relevant for the examination by the Examining Authority, and decisions by the Secretary of State, in relation to such applications" (para 1.14); and

"the contents of the Airports NPS will be both important and relevant considerations in the determination of such an application [for an airport development], particularly where it relates to London or the South East of England" (para 1.41)

The NPS was primarily designed on the assumption that, with policy so clear (that any new runway in the south-east should be at Heathrow) it has formal "effect" (in the terms of the Planning Act 2008) in relation to applications at Heathrow. This does not remove its relevance in decision-making for the current proposal to build a new runway at Gatwick. Indeed, the proposers accept the importance of the Airport NPS by referring to it over 250 times in their Planning Statement.

The Airports NPS: any new runway in the south-east should be at Heathrow, not at Gatwick

The Airports NPS is very clear: any new runway in the south-east should be at Heathrow. Indeed, it explicitly rejects the proposal for a second runway at Gatwick examined by the Airports Commission. In relation to that proposal, the Airports NPS concludes that "expansion at Gatwick Airport would not enhance, and would consequently threaten, the UK's global aviation hub status" (para 3.19). In addition, "Expansion at Heathrow Airport is expected to result in larger benefits to the wider economy than expansion at Gatwick Airport" (para 3.27), "The number of local jobs created at

an expanded Heathrow Airport is predicted to be much greater than at Gatwick Airport...and the jobs would also be created more quickly” (para 3.28), and “Heathrow Airport has advantages over Gatwick Airport with its greater integration into the national transport network, benefitting both passengers and freight operators” (para 3.37). This current proposal for a new Gatwick runway also fails to supply the new runway length and ATM capacity required by the Airports NPS for a new runway in the south-east, that would be supplied by a 3rd Heathrow runway (para 1.15).

The proposal goes well beyond ‘making best use of existing runways’: it is, in practice, a new second runway together with extensive new needed construction to support it both within and without the airport.

It is important to be clear on the scale of what is being proposed. Gatwick will move from being a single runway airport to one operating two runways simultaneously. The reasonable conclusion to draw is thus that the proposed works in practice create a new second runway.

The proposal moves the midline of the existing emergency/relief runway 12m north to comply with minimum runway separations. The applicant stated at Special Issue Hearing 1 that aircraft leaving the two runways would use the same flight paths when departing the airport requiring close air traffic management. The 12m proposed move is not a simple lateral extension of the existing runway (of the kind that has been permitted at Southampton in terms of runway length via local authority decision-making) but one that requires construction of a new runway base about 20m wide along the whole length of the existing runway (even if the northern section of the existing runway can be re-used as the southern part of the new runway), associated and quite extensive reworking of taxiways (for instance, new taxiway surfaces for Taxiway Juliet), then resurfacing and, presumably, removal of runway material to the south in order to avoid any confusion as to what constitutes any Northern Runway for pilots taking off from an uninstrumented runway.

In addition, there is substantial upgrading required to other taxiways and aircraft stands, often to accommodate larger aircraft, together with reworkings of terminals and new-build hotel and car-parking – plus a range of associated other work (say, on flood management). Despite all this we believe the reworking of the airport and associated infrastructure is incomplete and that more work will be required in due course. For example, in reality there should also be substantial works linked to further upgrade the recently upgraded railway station which has not been designed to deal with increased passenger numbers included within the proposal over the ones currently anticipated in the next few years. Without this rail passengers will be overcrowded and likely unable to meet the 30min travel period to London the applicant claims to be standard (this is in fact the fastest times available not an average time).

This extent and duration of construction is not making best use of existing facilities. However much the applicant would like to present it as being otherwise, this is in practice an application for a new runway in the south-east of England, contrary to the policy set out in the Airports NPS.

Policy on ‘making best use of’ is designed for smaller proposals at other airports

Given the scale and nature of the works above, looking at policy on “making best use of existing runways” is a distraction and a red herring. It is designed for smaller proposals – and airports other than Gatwick.

The Airports NPS acknowledges the possibility of “airports wishing to make more intensive use of existing runways”, “in light of the findings of the Airports Commission on the need for more intensive use of existing infrastructure as described at paragraph 1.6 above” (para 1.42).

Para 1.6 notes the Airports Commission views on “how to make best use of existing airport infrastructure”, “which it considered would require the more intensive use of existing airports other than Heathrow and Gatwick”.

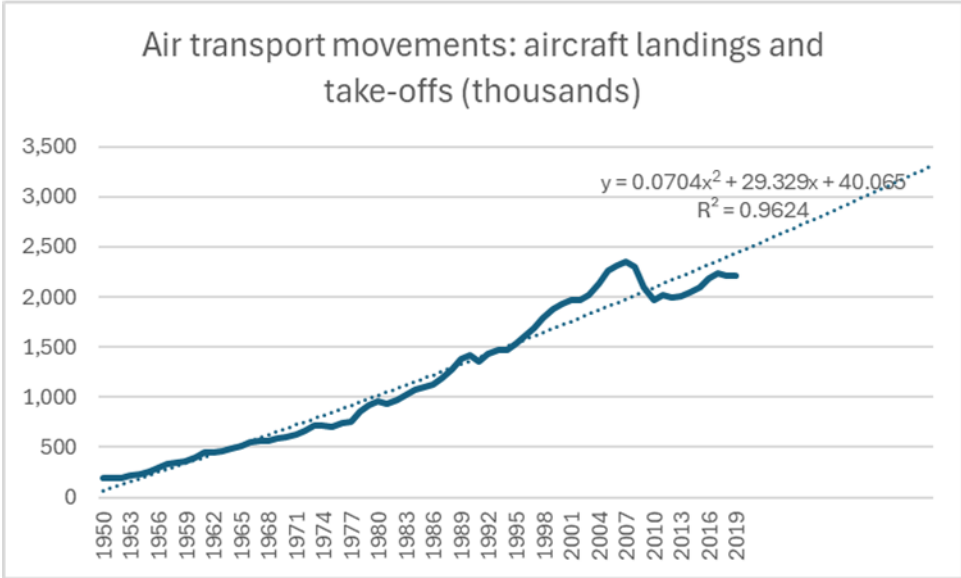
Even if one (incorrectly in our view) disregards the NPS focus of ‘making best use of existing runways’ as being at airports other than Gatwick, the relevant policy position is set out in Beyond the Horizon: Making best use of existing runways (2018). This makes clear that “making best use” is expected to apply, in the main, to relatively small applications, with planning determinations largely to be made by Local Planning Authorities (as set out in bold in para 1.29 to stress its importance).

At same time (in para 1.28) it defines growth under making best use as, at most, an increase in ATMs of 2% (or 1% with the Heathrow 3rd runway in place).

Fig 1 uses real world data to estimate the long run growth in aviation in the UK in terms of Air Traffic Movements (ATMs). This has the advantage of not being modelled information but real data that reflects all changes in aviation over an almost 70-year period. This suggests that in 2050 the UK could have 3.3million ATMs 2% of which is about 60,000 ATMs. The applicant’s projections exceed this considerably and even their base case seems above this level of growth.

Fig 1. Note: Trend line fitted in Excel using a second order polynomial which provides the best fit to the data in comparison to alternative fits (such as linear)
Estimated ATMs based on historic data from 1950m to 2019.

Data derived from Department for Transport table code: TSGB0201 (AVI0101). Figures for the pandemic and post-pandemic period (i.e. 2020 on) not used to avoid confounding long term trend estimate. 2% of 3,300,000 ATMs is 66,000. Gatwick’s proposal exceeds this value and is thus out of scope to be considered best use as defined by “Beyond the Horizon: Making best use.”



Indeed, as stated in the Planning Statement (Book 7, p41 Table 3.3 and associated paragraphs) capacity in terms of Base Case passenger numbers could still increase even without the current proposal from the 2019 figure of c. 46million to c.72million in 2040 if there really was demand at

such passenger or ATM levels. We note that no detailed explanation is given as to how the base case level of growth would be achieved.

So, a new runway is not required for Gatwick to “make best use” of its existing facilities. A similar conclusion can be reached by using passenger numbers. For example, the additional benefit to Gatwick of the new runway project would be 13m extra passengers per year. This is well above a 2% increase over the base case they provide.

Furthermore, constructing a new second runway and the extensive reworking of the airport is beyond what would be expected under making best use and also deprives the LAs of their ability to influence development in the area as much of the proposal would normally be dealt with by the local planning process.

Conclusion: the proposal represents a new runway in the south-east and is contrary to policy

The proposal is well beyond the scope of “making best use” in terms of the nature and scale of the works, and the number of ATMs it expects to generate. It is in practice a new second runway at Gatwick and thus contrary to the “important and relevant” Airports NPS.

Given that the applicant accepts the relevance of the NPS to the degree they have then it follows logically that the main conclusions of the NPS must still stand and they should withdraw the application or it should be refused.

References

House of Commons Library Briefing Paper (2017) Number 06881 Planning For Nationally Significant Infrastructure Projects

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