



The countryside charity
Sussex

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By electronic submission to the
Examining Authority

21 August 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 – Further comments submitted for Deadline 9 in
relation to aviation policy, climate change and matters that appear unresolved**

CPRE Sussex still are opposed to the proposal for a new second runway at Gatwick as a number of key issues have not been fully addressed by the Applicant or have been left for the ExA to deal with, if possible, in their recommendations to the SoS. We are commenting now after considering the responses of the Applicant to various Interested Parties, including ourselves, CAGNE, GACC and the New Economics Foundation et. al. We remain are opposed for these reasons:

Non-compliance with Policy

The proposals are not consistent with national aviation policy as we argue in our submissions relating to ISH1 (CPRE Sussex Deadline 1 submission, Annex 1). The Applicant knows Gatwick is described by its owners as a “single runway” airport so claiming it has two already is surely inappropriate. The proposal is for a second, fully operational runway (with associated extensive reworking of taxiways and other works) and therefore a new one. The Airports NPS still indicates that any new runway in the south-east should be at Heathrow. ‘Beyond the Horizon – Making Best Use of Existing Runways’ does not envisage the creation on new runways so the proposal must be out of scope of the policy. Moreover, the proposed increase in passenger numbers exceeds the percentage figures envisioned for any increase resulting from “making best use”.

Failure to fully act on advice on climate change so as to be sure to reach net zero by 2050

The Climate Change Committee’s advice is clear that there should be no airport expansion without clear demonstration that the sector will outperform emission expectations on the path to net zero. The Applicant has not clearly demonstrated that will happen.

The Applicant and the Draft DCO (even as amended) do not address the need identified in Flightpath to the Future (p8) for each airport that seeks to expand to address its climate change obligations. This is surprising given the scale of the climate change impacts of carbon dioxide and non-carbon dioxide emissions on Sussex and elsewhere. There are various aspects of this, some of which CPRE Sussex sets out in its Deadline 4 submission. Other points now arise from how the Applicant has previously responded to the ExA (e.g. Response to the Examining Authority’s Written

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Questions – Climate Change and Greenhouse Gases, p3) and the absence of emission cap measures in the draft DCO.

To meet climate change obligations the Applicant appears to rely on the High Ambition scenario in the Jet Zero Strategy documents which are heavily dependent on the introduction of technologies (such as Sustainable Aviation Fuels) that do not yet exist at the necessary scales and whose emission savings have been called into some question by the Royal Society through its call for more research (CPRE Sussex Deadline 4 submission). A key issue here is how carbon emissions are accounted for. In considering Sustainable Aviation Fuels (SAFs) account is taken of the greenhouse gases emitted by the production process. This substantially reduces any emission savings from the use of biofuels. The Life Cycle Analyses (LCAs) supporting use of these fuels do not as yet account for the fact that carbon that would have remained in the terrestrial environment (e.g. as a forestry waste or a waste oil) will still be transferred to the atmosphere so they are not fully complete as LCAs, but they do take production emissions into account. It is inconsistent if the Applicant accepts this is good to do for SAFs but then rejects any idea of doing this for standard jet fuels from fossil fuel sources (e.g. Response to the Examining Authority’s Written Questions – Climate Change and Greenhouse Gases, p3 et seq). Failure to account for this makes the assessment of greenhouse gas impacts unbalanced as different kinds of fuels are treated differently.

We note also that the Applicant has not fully answered the point made by the New Economic Foundation that the climate change impacts of non-carbon dioxide emissions need to be accounted for by use of the accepted established DESNZ multiplier (The Applicant’s Response to Written Representations: Appendix D – Response to New Economics Foundation pp 2 and 3). The Applicant argues that Dft guidance allows the Applicant to make no use of the multiplier even to perform some sensitivity analyses. This does more than run against the spirit of this guidance. Since application of the multiplier to the proposal’s emissions could push increased emissions into the range where they must to be taken into account in the ExA’s decisions absence of any use of the multiplier seems to be a serious weakness in the Applicant’s case and makes it harder for the ExA to make its assessment of the proposal. Surely the EXA needs to know whether the projects greenhouse gas emissions have to be taken into account or not in terms of their national significance with respect to the Sixth Carbon Budget?

CPRE Sussex believes that for the above policy and climate change considerations the Applicant’s proposals should not be recommended for approval.

Should the ExA be minded to recommend approval in despite of the above considerations then CPRE Sussex would ask that the DCO should be further amended as follows:

A decreasing carbon emissions cap aligned with the aviation sector’s own roadmap to Net Zero

The “carbon plan” in the draft DCO and other responses of the Applicant (say to the New Economics Foundation and others) reinforces the view that the Applicant is over-reliant on the speculative roadmap and high ambition scenarios contained in documents such as the Jet Zero Strategy, Jet Zero Strategy One Year On, and Flightpath to the Future (see the CPRE Sussex deadline 4 submission).

CPRE Sussex notes that the draft DCO as amended by the ExA already places restrictions on operations in relation to noise and public transport. We fully support these amendments.

CPRE Sussex ask that a similar amendment is made to restrict greenhouse gas emissions if the high ambition scenarios for emission reductions are not being achieved. The desired rate of reductions in emissions to reach net zero could be deduced from the roadmap. If the Applicant wishes to depend on the high ambitions inherent in the aviation net zero roadmap to meet its climate change obligations, then they should be willing to accept the need to operate within the emission reduction pathway indicated by the roadmap. The Applicant has several ways in which it could implement a declining cap on emissions by, say, reducing use of aircraft stands or that of the proposed second runway if the sector as a whole were not delivering on the technology to mean Gatwick emissions would be on track to reach net zero by the due date. The choice of method would be up to the Applicant. The government would not be restricting flights per se if the DCO had a declining greenhouse gas emissions cap. Other international airports and governments are taking or exploring not dissimilar approaches (e.g. Schipol). CPRE Sussex has already suggested that technology could be installed to achieve free air capture of carbon dioxide – again this is part of the roadmap to net zero. This could be a necessary condition of the operation of two runways, say, after 2035 (we do not propose an earlier date because we accept this technology is not yet available at sufficient scale). Annual reporting on emissions should also be explicitly required so that progress can be transparent to all users of the airport and local residents and so the SoS can base any decision to restrict future operations that were exceeding national emission budgets on transparent and robust evidence. Non-carbon dioxide emissions would need to be accounted for as well as carbon-dioxide ones.

We await the Applicant's response to the CAGNE proposals for a cap set out in Submissions on behalf of CAGNE Deadline 8 (7 August 2024).

Concerns on matters that still appear unresolved

Waste Water Treatment

CPRE Sussex is concerned that this matter, where an upgrade of the current WWT plant is urgently needed to cope with existing demand and problems of flooding linked to rainfall and intense rainfall events (driven by climate change), remains not fully resolved. CPRE Sussex are concerned that the economic difficulties of Thames Water may prevent any upgrade occurring in a timely fashion and that the Applicant needs to provide an on-site facility for treating foul water emanating from the site due to higher numbers of staff and passengers. We recognise that this would be a significant extra cost for the Applicant but this seems to be the only way the waste can be dealt with without the risk of imposing harm or damage on nearby residents and the environment. The DCO needs to be as clear as possible on this need for an on-site works that is state-of-the-art (e.g. similar to that deployed by Southern Water near Hailsham, Sussex).

Airspace use and visual and audible intrusion affecting the amenity of the National Park and High Weald Area of Outstanding Natural Beauty

This issue is linked to matters of exactly where increased numbers of aircraft will fly and how airspace might have to change should a second runway be operational. We note the concern expressed by some airlines (EasyJet, British Airways) on airspace suggesting this issue needed more consideration. Noise and visual intrusion can decrease the enjoyment people get from visiting these nationally important landscapes so some account is needed of this. We are surprised that modernisation of the airspace was not included within the proposals because without that these impacts cannot be assessed.

Air Quality and Odours

The issues discussed at ISH9 on these matters need to be reflected with air quality standards being binding in the DCO. As knowledge improves the impacts of poor air quality in the environment and on people are becoming clearer. Standards are rising, so the DCO should have targets in line with the WHO recommendations with the option for these to be tightened over time. Some safeguards are likely needed to protect local residents and the environment from odours that may arise from the handling and use of alternative fuels. We recognise there is uncertainty in respect of this but some provision for preventing nuisance is needed.

CPRE Sussex is concerned that the Applicant's approach to the risks of poor air quality to human health (and the health of its various employees, members, volunteers and supporters) is misconceived since comparisons are made to the risks of smoking. This frames the risks wrongly as one risk is voluntary (unless the individual is exposed to passive smoking) and the other is imposed by a polluter. This undermines confidence in the ability of the Applicant to frame risks appropriately and suggests that the ExA might give more weight to the views and expertise of other bodies, such as the expertise and assessments provided by CAGNE and less to the material supplied by the Applicant.

Housing and transporting the workforce

Sussex, and Crawley especially, is already under substantial housing pressure (e.g. see CAGNE submission REP1-149) and is subject to widespread development that is proceeding without due weight being given to (a) the need to supply and treat water without damaging the environment, (b) the need of communities for local social infrastructure and (c) the loss of land and its associated services already performing other functions for society (e.g. agricultural land, amenity land that helps mitigate flood risk). Housing and transporting the workforce for a two-runway airport would put further pressure on local and even regional transport systems, housing supply and housing markets. Such wider impacts of the proposal need to be recognised as this will affect the ability of the airport to function without off-site impacts causing substantial problems for Sussex's economy, countryside and green spaces. These wider negative impacts of this NSIP could have been given more consideration by the Applicant and should be considered in the ExA report on the proposal.

CPRE Sussex may send a brief further response at Deadline 10 if relevant material emerges from the Applicant or other bodies.

Yours faithfully,



Prof Dan Osborn,
Chair, CPRE Sussex.