

Tony Kershaw
Honorary Secretary

County Hall
Chichester
West Sussex
PO19 1RQ



Telephone 0330 2222543
Website: www.gatcom.org.uk

If calling ask for
Mrs. Monique Smart
e-mail: secretary@gatcom.org.uk

26 July 2022

Dear Stewart,

Gatwick Northern Runway Further Pre-Application Consultation

As the airport's statutory independent consultative body, GATCOM welcomes the opportunity to provide comments on GAL's further consultation on the pre-application proposals to bring the existing Northern Runway into routine use alongside the main runway.

This response is to be read alongside GATCOM's previously submitted response of 1 December 2021, a copy of which is annexed to this letter for ease of reference. All the points raised in GATCOM's previous response remain pertinent and need to be addressed by GAL as it prepares the DCO application submission.

The Committee has considered the further consultation material and make the following comments:

Highway Improvement Plans

GATCOM supported the principle of the proposed improvements to the local highway network at the North and South Terminal roundabouts and at the Longbridge roundabout in its previous response as the schemes are likely to bring improvements to local traffic flows as the airport grows. The Committee is pleased that GAL has taken steps to revisit the previous designs in light of consultation feedback to ensure the highway improvements strike a better balance between the needs of both local non-airport and airport traffic to deliver the capacity needed as well as limiting the potential impacts on the natural and built environment and on communities surrounding the airport.

It is noted that GAL's preferred new solutions have been developed in consultation with National Highways. However, whilst acknowledging that GAL has had some engagement with the local authorities (and their consultants) on highway proposals,

BY EMAIL

Stewart Wingate
Chief Executive Officer
Gatwick Airport Limited
feedback@gatwickfutureplans.com

some GATCOM members are concerned about the lack of engagement with the local highway authorities on technical matters, prior to the launch of the further consultation. It is vital that GAL proactively seeks meaningful engagement with the local authorities so that they have the opportunity to contribute to the evolving designs to ensure traffic flows in the surrounding areas are not adversely affected and are considered holistically and alongside other planned development and highway/traffic management/active travel schemes planned for surrounding areas.

In respect of promoting active travel, many GATCOM members believe more could be done to bring forward active travel improvements as part of the Northern Runway project. GAL is therefore asked to revisit the proposed active travel initiatives and schemes with the aim of building into the highway improvement schemes the provision of walkways and/or cycleways to enable passengers staying in local hotels and staff from local areas to have the option to cycle or walk to the airport terminals. New connections, and significant improvements to existing routes, need to be planned and designed from the outset with the highway improvements.

GATCOM also reiterates the need for the highway improvements to be delivered at the right time as the airport grows so that they are constructed and implemented in advance of the Northern Runway becoming operational. It is noted that the full traffic modelling is still to be concluded to determine the timing of delivery of improvements. However, it is important that schemes are delivered in good time to accommodate future growth.

In respect of the traffic modelling, the Committee wish to be assured that the scope of the modelling will take into account the potential impact on areas of special interest close to the airport, for example the Ashdown Forest, with the outcome of the modelling providing a basis for a joined-up approach to future sustainable transport across a wide area. It is important therefore that the outcomes of the full modelling are shared with the local authorities at the earliest possible time to enable them to engage more meaningfully with GAL on the evolving scheme design and the update to the Airport Surface Access Strategy (ASAS).

GAL's preparation of an updated ASAS to cover both the construction phase and operational phase of the project, to be submitted as part of the DCO application, is supported. It is noted that GAL intends to discuss with the local authorities and key stakeholders the proposed commitments for new measures supporting public transport and sustainable transport modes. It is important that as part of this work GAL takes into account the Government's new aviation strategy "[Flightpath to the Future](#)" which restates the need to set mode share targets for sustainable passenger and staff travel to and from the airport. GATCOM would like to see the updated ASAS include details of how targets are to be monitored and the timescale for delivery, with triggers for delivery as the airport grows.

As the updated ASAS is developed and traffic modelling concluded, GATCOM requests that GAL share details with the Committee in advance of the draft ASAS being confirmed and submitted as part of the DCO application.

Car Parking Provision

Determining the level of future car parking provision poses a difficult challenge. There is a need to ensure there is a proportionate balance between providing adequate authorised car parking to accommodate future passenger and airport staff demand

but in a way that encourages greater use of sustainable transport modes and prevents additional unauthorised off-airport parking (in rural areas and on residential streets) and its associated impacts on local communities. The pricing of on-airport parking also needs to be set at the right level to support a shift to greater use of sustainable transport modes.

GATCOM's previous response commented on the proposed 18,500 extra car parking spaces which suggested that there will be a proportionate increase in passengers using private vehicles to access the airport. The Committee also highlighted that any increase in parking needed to be fully justified in the context of a sustainable surface access strategy. GATCOM is therefore pleased that GAL has re-examined the forecast car parking provision in light of the emerging updated ASAS and feedback to the consultation. It is noted that GAL has identified a reduced minimum number of spaces required - 12,025 spaces - taking into account other initiatives supporting sustainable travel and greater optimisation of the proportion of spaces used with increased occupancy rates to over 85%.

There are a mix of views about the revised level of car parking provision. Of key importance is the need to ensure there is sufficient car parking provision to accommodate those who need to travel by car to the airport where there are no suitable alternative sustainable transport modes (active travel, bus, coach or rail).

It is noted that GAL's Parking Strategy demonstrates the number of spaces required and shows how GAL, together with existing authorised off-airport parking providers can meet future parking needs. GATCOM's Passenger Advisory Group is aware of the current increase in demand for car park bookings and acknowledges that the current demand may not be representative of future travel behaviours. As it is not yet known what is driving passengers' behaviour of transport mode choices, which has changed since the pandemic, it is important that GAL continues to work with the rail, coach and bus operators to gain a better understanding of travel behaviours and how they will look in the future. This must be taken into consideration as part of the update to the ASAS and final Parking Strategy.

GATCOM also requests that, in the context of a comprehensive approach to developing a sustainable transport strategy that there is a mechanism put in place through the DCO process to ensure that GAL only provides parking when it is needed, and for this to be actively monitored.

Proposed Noise Envelope

GATCOM has welcomed GAL's proposal to introduce a noise envelope to set a limit on noise from future operations at Gatwick and to set tighter limits as the number of Air Traffic Movements (ATMs) grows. This is a significant and positive approach to managing the noise footprint of the airport as it grows and is a concept that GATCOM would like to see taken forward by GAL even if the Northern Runway project is not progressed.

GATCOM's original response asked GAL to undertake further engagement on the evolving noise envelope design and to set up a noise envelope design team, as suggested in the CAA's CAP1129. It also requested that GAL, in liaison with the local authorities and Gatwick's Noise Management Board, develops a process through which the operational aspects, such as how compliance with the limits is monitored and enforced, so that this may be included in the new section 106 agreement.

The further engagement GAL is undertaking is welcomed. The themes being covered as part of the process (Noise Envelope Options such as metrics, years, forecasts, fleet mix; the process of operating and managing a Noise Envelope including monitoring reporting; and the process of enforcement) will address many concerns previously expressed by GATCOM. Of key importance to the proposed noise envelope design is the need to ensure that there is a process built into the noise envelope management, monitoring and enforcement regime that will:

- Clearly define the criteria against which the noise envelope might be judged to be effective or not and by whom the monitoring and enforcement will be undertaken.
- Require the periodic review of the envelope and its effectiveness in managing and reducing noise.
- Ensure any changes to airspace, such as FASI-South or other future changes to Gatwick's arrivals and departures routes, triggers a review of the noise envelope to ensure it remains appropriate and effective to changed circumstances
- Set out the terms of reference for such reviews and clearly define the requirements for engagement and consultation with key stakeholders, including GATCOM and Gatwick's Noise Management Board (or future noise engagement forum), as part of the review process.

While it is noted that GAL's chosen engagement mechanism is different from that suggested in the CAA's CAP1129, it is a comprehensive and inclusive engagement mechanism involving a wide range of stakeholders and community groups. GATCOM acknowledges that some community groups continue to express serious concerns about GAL's further engagement mechanism in that it does not follow the full process set out in CAP1129 and that there was no discussion to agree the terms of reference of engagement or appointment of its Chair. However given the [advice of the Planning Inspectorate](#) to the GATCOM Secretariat that "*The statutory consultation required under the Planning Act 2008 (PA2008) is not set out in guidance such as CAP 1129, however if a developer is applying this guidance to its noise assessment, it is best practice to follow that guidance unless another appropriate method is applied*", the appropriateness of GAL's chosen engagement mechanism will be a matter for the Planning Inspectorate to consider once the application has been submitted.

GATCOM will continue to encourage all stakeholders and community groups to constructively participate in the engagement process but recognises that it may not be possible for the Noise Envelope Group to agree on a single workable noise envelope solution given the difference of views and expectations of the various stakeholders. It is hoped however that the engagement will deliver clear preferences on certain aspects of the noise envelope design, especially in terms of the monitoring, review and enforcement regime.

Climate Change and Carbon

Many of GATCOM's member organisations remain concerned about the increase in greenhouse gas emissions and the impacts on climate change arising from the airport's growth plans. GATCOM's previous response highlighted the divergence of views about whether GAL's emissions forecasts and carbon cost values used in its preliminary economic impact assessment were accurate.

GATCOM is pleased that GAL has taken the opportunity to provide an update on its work and assessments as part of the current consultation, particularly in respect of

GAL's work to update the Economic Impact Assessment to reflect the latest carbon values issued by BEIS in September 2021. GATCOM notes that the Government's Jet Zero Strategy has yet to be published which, when published, may mean that GAL will need to again revise its Economic Impact Assessment and other carbon assessments to take account of new policies and targets. GATCOM suggests that GAL provides a further project update to advise on any further assessment work needed and provide reassurances that the forecasts and values have been fully and appropriately assessed.

The Committee is supportive of GAL's commitment to low-carbon growth. GATCOM again advocates the need to ensure GAL's draft Carbon Action Plan is subject to further discussion and engagement with the local authorities in identifying and setting out measures to reduce emissions over which GAL has direct control. There is also a need for GAL to work in partnership with other organisations to help influence and drive forward reductions in Scope 3 emissions (includes those emissions from flights taking off and surface access trips to/from the airport). It is noted that GAL is in the process of developing a Carbon Action Plan to explain how the airport will reach net zero for Scope 1 and 2 emissions before 2040 and which will also describe how GAL intends to influence reducing emissions from construction, surface access and aviation. So that GATCOM can have a greater understanding of GAL's approach to managing carbon, it requests that GAL reports to GATCOM on the implications of the Government's Jet Zero policy, once published, on the airport's current operation as well as on the carbon assessments for the Northern Runway project prior to the DCO application being submitted.

Employment Skills and Business Strategy (ESBS)

GATCOM welcomes the additional detail provided in the project update on the development of the ESBS and the work and engagement being undertaken to help refine the Strategy, the Implementation Plan and governance arrangements for the delivery of the ESBS. It is hoped that the GAL's commitments made as part of this Strategy will be backed up by legal obligations in the new Section 106 agreement reflecting priorities identified by local authorities, businesses, colleges and HE providers.

GATCOM trusts the comments set out above can be addressed and taken into account as the scheme design, further engagement and assessments evolve. There is on-going concern across GATCOM's membership about the need for GAL to release further information as it becomes available particularly in respect of the outcomes of the full transport modelling, ASAS and sub-strategies such as Rail, Bus and Coach, Active Travel and Parking; Carbon Action Plan; Employment Skills and Business Strategy; Construction Programme; and Biodiversity Net Gain, which needs to be addressed by GAL.

Yours sincerely,

Monique Smart

GATCOM Secretariat

**GATWICK NORTHERN RUNWAY PRE-APPLICATION CONSULTATION
GATCOM'S RESPONSE 1 DECEMBER 2021.****1. CONSTRUCTION PHASING AND DELIVERY OF MITIGATION MEASURES**

1.2 It is accepted that a major infrastructure project of this nature will take many years to be delivered especially given the constraints on construction while the airport remains operational 24 hours a day. GATCOM notes the likely construction phasing for the project and that the works in the period up to 2029 allow the airport to transition to serve dual runway operations and that some construction activity will continue over the period 2029 to 2038 to enable the full capacity uplift brought by the Project to be realised.

1.2 GATCOM is concerned however that many of the proposed mitigation measures are to be delivered after the Northern Runway opens. Given the forecast growth of the airport from the use of its main runway over the period of the construction of the northern runway project as well as the uplift in available capacity once the northern runway is opened, GATCOM is concerned that communities will suffer the negative impacts of that growth for many years before the mitigation measures, such as the surface access schemes, are delivered. This is not acceptable given the significant impact and nuisance communities will suffer during the period of the project's construction. Everything that can be done to reduce and minimise the negative impacts of airport growth should be a priority.

1.3 It is vital that mitigation measures are delivered at the right time to ensure the negative impacts are reduced and limited as far as possible as the airport grows. GATCOM therefore expects to see triggers to be applied to the delivery of mitigation schemes linked to passenger and/or ATM growth at the airport from the commencement of the project's construction and that any such triggers should feature in the new section 106 agreement. This will ensure that mitigation measures are delivered at the right time.

1.4 The significant impact of the construction works on local communities close to the airport, particularly Charlwood and Horley, is of serious concern. Any increased use of the Crawley Goods Yard and Railhead, especially at night, would also be a significant concern. The impacts associated with construction such as construction noise and dust, construction traffic and general disruption will be significant, particularly during the night period. GAL must therefore engage with local councils and affected communities, including those communities that will experience the impact of construction traffic on local roads, such as Smallfield and Lingfield, on the construction phasing, mitigation and proposed compensation schemes at the earliest possible time. It is also important for GAL to develop a communication plan to keep affected communities informed of what to expect and how local issues/problems that arise during the construction can be discussed and addressed.

2. CLIMATE CHANGE AND CARBON

2.1 GATCOM acknowledges that many of the Committee's member organisations have serious concerns about the significant increase in greenhouse gas emissions and the impacts on climate change arising from the airport's growth plans. GATCOM is also aware that the Government's policy on aviation decarbonisation is still being developed and the outcomes from the Jet Zero consultation awaited. The Jet Zero

consultation has however reaffirmed the Government's view that international connectivity provided by UK aviation is vital to the country's long term economic prosperity, and that growth in aviation is not incompatible with meeting the UK's greenhouse gas reduction targets.

2.2 While there is divergence of views across GATCOM's membership as to whether the emissions forecast by Gatwick are consistent with the government policy (see Annex 2), the Committee is of the view that addressing the climate impacts and measures to achieve low carbon growth must be a priority for GAL. The commitments given in the pre-application consultation document along with details of the key components to be addressed in the draft Carbon and Climate Change Action Plan give some indication of GAL's approach. However, there is a need for interested parties to have an understanding of how airport expansion can be justified in light of national and international carbon reduction targets, particularly the local authorities which have either declared a climate emergency and/or have climate and decarbonisation strategies. It is important that GAL plays its part in helping the local authorities to achieve their climate and decarbonisation targets.

2.3 GATCOM is supportive of GAL's commitment to low-carbon growth but advocates the need to ensure GAL's draft action plan is subject to further discussion and engagement with the local authorities in identifying and setting out measures to reduce emissions over which GAL has direct control as well as how working in partnership with other organisations GAL can influence and help drive forward reductions in Scope 3 emissions (includes those emissions from flights taking off and surface access trips to/from the airport). GATCOM requests that GAL report back to the Committee on the development of the draft action plan which should seek a progressive, material reduction in the total climate impacts (including non-CO2 impacts) from a 2019 baseline. GATCOM wishes to see a reduction trajectory set and a process by which progress can be independently monitored and remedial action taken in the event that reduction targets are not being met. GATCOM also requests that the commitments given in the action plan be included in the new section 106 agreement.

3. SURFACE ACCESS ASSESSMENTS AND COMMITMENTS

3.1 As highlighted in GATCOM's response to the draft airport master plan consultation, the Committee has on-going concerns about the significant congestion (pre-pandemic) on the motorway and strategic road network in the area and on local roads as well as the capacity constraints on the Brighton Main Line to accommodate Gatwick's growth plans.

3.2 While it is noted that, pre-pandemic, almost half of Gatwick's passengers already use sustainable modes of transport to travel to and from the airport, GATCOM remains to be convinced about the road and rail assumptions made to support the Northern Runway proposals.

3.3 It is noted that GAL is using a number of tools to understand the potential effects of the Northern Runway proposals on regional, local and on-airport transport networks but that the work to date suggests that construction and operation is not expected to have significant effects beyond the immediate local highways. This assessment outcome is questioned. The proposed 18,500 extra car parking spaces alone suggests that there will be a proportionate increase in passengers using private vehicles. Any increase in parking should be fully justified in the context of a sustainable surface access strategy.

3.4 The information of wider traffic impacts is not clear with regard to the difference between 2016 and future 'baseline' and 'future with project' conditions. This makes it difficult to understand background traffic growth on the highway network and the specific impact of the proposals on that network.

3.5 In addition, there are Network Rail and National Highways schemes included in the future baseline assessments that are not fully-funded or going through the relevant statutory planning process. The schemes include the Croydon Area Remodelling Scheme (CARS), a strategic rail improvement, and the Lower Thames Crossing (LTC), a strategic highway improvement. Should these schemes not come to fruition, they may impact travel behaviours and adversely affect the achievement of GAL's proposed mode share targets. GATCOM therefore questions whether transport network changes that are not currently fully-funded or going through the statutory planning process, should be removed from the future baseline assessments.

3.6 More information is also needed on how the Gatwick Mode Choice Model has been developed. It is difficult to understand the suggested changes in mode choice by passengers and staff. Based on the information available the suggested mode share targets are considered to be ambitious because although Gatwick has been relatively successful in targets for sustainable transport mode share by passengers, this has not been the case for airport staff. In addition, the behavioural choices by passengers and airport workers are also uncertain following the COVID-19 pandemic, with many people still reluctant to use public transport and the continuation of remote/virtual working and the reduced number of business trips. The predictability of mode share needs further examination to further test the modelling and assessment of the impacts of airport expansion in a range of scenarios, which should include a lower expectation of shift to public transport in line with recent trends.

3.7 The principle of the proposed improvements to the local highway network at the North and South Terminal roundabouts and at the Longbridge roundabout is supported. These schemes will bring improvements to local traffic flows as the airport grows.

3.8 However, there is a need to also address the ever-growing problem of approaching traffic from the surrounding road network in Surrey, West Sussex, East Sussex and Kent. Pre-pandemic, the local road network, including country lanes, was already being commonly used to access the airport with traffic volumes exacerbated when there is disruption and congestion on the M25 and M23. Account also needs to be taken of the site-specific impacts of emerging large development sites in the area; these include Gatwick Green, and Horley Business Park. Due to their proximity, these strategic sites will have a cumulative impact on the transport network. As part of GATCOM's response to the draft Airport Master Plan the A22, A264, A24 and the possibility of a Crawley western link road were highlighted as potential routes needing improvement where possible financial contributions to local authorities towards improvements may be needed.

3.9 GATCOM also continues to believe that more focus needs to be given to improving the east – west links to the airport particularly to bring forward initiatives to serve passengers and staff accessing the airport from areas in Kent by rail and coach. For example, there is a need for GAL to actively support the need to reinstate the rail service to Tonbridge via Redhill and Edenbridge, with a possible link to the existing service between Gatwick and Reading. This would help widen the economic benefits of the airport to Kent.

3.10 GAL is therefore asked to give further consideration to the impacts of airport growth on these particular points in liaison with the local highway authorities and the rail industry.

4. NOISE IMPACTS

4.1 It is noted that the noise modelling has assumed that use of the northern runway would be limited to the period 06:00-23:00 hours, avoiding scheduling flights in the majority of the more sensitive night period. GATCOM also notes that GAL is not seeking to increase permitted numbers of movements and noise quota for the night quota period (23:30-06:00) set by the Department for Transport. GATCOM questions however why GAL is not committed to limiting the use of the northern runway for the full 8 hour night period 23:00 – 0700. Whilst the airline representatives view the period 06:00 to 07:00 as important to maintain the resilience and efficiency of route networks, GATCOM reiterates the comments made in its response to the draft Airport Master Plan requesting that there be no increase in ATMs on the main runway from 2018 levels during the night period 23.00 – 07.00 as well as giving a commitment to not to operate the Northern Runway during the night period 23.00 – 07.00 except when the main runway is non-operational.

Proposed Noise Envelope

4.2 GATCOM welcomes GAL's proposal to introduce a noise envelope to set a limit on noise from future operations at Gatwick and also to set tighter limits as the number of ATMs grows. This is a positive step forward in managing the noise footprint of the airport as it grows and is a concept that GATCOM would like to see taken forward by GAL even if the Northern Runway project is not progressed.

4.3 However, GATCOM is concerned that prior to the launch of the pre-application consultation there had been no engagement with GATCOM, Gatwick's Noise Management Board or local authorities on the development of the noise envelope proposal. This is disappointing given the Civil Aviation Authority (CAA) guidance set out in [CAP 1129](#) states that as a minimum the airport operator should involve other local authorities in the vicinity of, and affected by, the airport and also airline representatives in developing the noise envelope concept. The guidance also requires the setting up of an "envelope design team" to produce a proposal for the noise envelope design including appropriate metrics and respective limit values before consulting on the proposal.

4.4 Whilst it is appreciated that GAL is consulting widely on the proposal as part of the DCO process, it is important that a noise envelope design team is established following the close of the consultation. The envelope design team should consider the feedback received and input to a revised envelope design in light of consultation responses with a view to seeking further engagement on the revised envelope design. GAL should undertake the CAP1129 process and report back to GATCOM regularly on progress with a view to it being implemented irrespective of the outcome of the DCO process. As part of this process, GATCOM also requests that GAL, in liaison with the local authorities and Gatwick's Noise Management Board, develops a process through which the operational aspects, such as how compliance with the limits is monitored and enforced, so that this may be included in the new section 106 agreement. GATCOM believes that the monitoring and enforcement should lie within the Section 106 agreement's monitoring processes in addition to GAL's own internal performance monitoring.

4.5 As regards specific comments on the proposed noise envelope, GATCOM highlights the need for the frequency of overflight to also be taken into account in the noise envelope design. It is the frequency of overflight that is of greatest concern to local communities affected by aircraft noise. GAL's consultation material advises that noise impacts of the Project would largely be the result of increases in noise due to the increased number of flights on the northern runway, rather than new noise impacts over areas previously unaffected. Whilst GATCOM is aware of difficulties in applying noise frequency metrics, GAL should note that at the Heathrow Terminal 5 Public Inquiry the Inspector highlighted that an annual movement limit was needed in addition to a contour cap, as the Leq index on its own was, in his view, insensitive to the number of ATMs. This is why the Heathrow Terminal 5 planning agreement limits the number of air transport movements (ATMs) to 480,000 each year. GATCOM therefore asks that GAL consider the scope of including as part of the noise envelope a frequency metric. This is in addition to any other matters that appear appropriate to the design team for the formulation of the noise envelope.

Departure Noise Limits

4.6 GATCOM supports GAL's proposal to set new departure noise limits to better incentivise good operational practice across all aircraft and not just the noisiest aircraft, to ensure that aircraft are flown in the quietest way possible. It is also noted that this proposal will be taken forward independent of the DCO process given it is an action in the current statutory noise action plan.

4.7 GATCOM welcomes in principle the proposed noise limits but is aware that there may be specific views of other interested parties that will need to be taken into account in finalising the new limits. GATCOM therefore requests that GAL report on the outcome of the consultation responses and its engagement with airlines on this particular proposal and the administration of a revised system to the Gatwick Noise Management Board so that the final detail of the proposal can be discussed and agreed with all stakeholders before its introduction.

Noise Insulation Scheme

4.8 It is noted that areas under the arrivals and departure routes close to Gatwick would experience the full 20% increase in Gatwick flights but that in areas away from the extended runway centrelines this would not be the case. There is a vital need to mitigate the impact of such an increase in noise events for those communities under flight paths that would be exposed to significant levels of noise disturbance. GATCOM welcomes an enhanced noise insulation scheme with its two zones and the scheme for schools. GATCOM also welcomes GAL's commitment to implement the new scheme at the time construction of the Northern Runway Project begins so that properties can be appropriately modified before the reconfigured northern runway becomes operational. The proposal to enable residents who have previously taken up grants under the existing scheme to apply for the new scheme is also supported.

4.9 However, given the expected increase in the number of flights at the airport, it is questioned whether GAL should look to go even further with the enhanced scheme through the use of the N above contours to determine the boundary of the new scheme. The N above contours would better reflect the number of noise events households experience.

Home Owners Assisted Move Scheme

4.10 This proposed scheme is welcomed.

Ground Noise

4.11 All activities associated with the proposal will increase ground noise at the airport. It is noted that GAL proposes to introduce a variety of measures to mitigate the effects of airport ground noise, including the construction of a new noise bund at the western end of the Northern Runway. It is essential that the level of ground noise is robustly monitored and additional measures put in place if ground noise levels are likely to exceed assessed maximum levels.

4.12 Of particular concern is the potential increase in the number of ground runs. Whilst GATCOM acknowledges the vital importance for mandatory safety tasks to be undertaken on aircraft, GATCOM requests that the new Section 106 agreement continues to include an obligation on the number of ground run engine tests that may be undertaken within any rolling six-month period with triggers to require alternative means of managing or mitigating any material impact, including the consideration of a ground run pen.

5. AIR QUALITY

5.1 It is noted that GAL has assessed the extent to which the Project may result in potential impacts, including cumulative effect, upon air quality having full regard to both construction and operational phases of the Project. However, as there was no source apportionment data in the PEIR it was difficult to understand where expected pollution will come from, for example, whether from aircraft, road traffic (airport and non-airport), construction, the proposed CARE facility or wastewater treatment works. Whilst there are expected to be significant falls in pollution from road traffic, pollutant concentrations in the 2029 scenario are likely to be similar to the 2019 position. The lack of source apportionment in the PEIR means there was no way of determining why pollution levels are not expected to fall. It is understood that GAL has recently provided the missing evidence to local authorities. It is important therefore that GAL acknowledges that stakeholders may need more time to assess the new evidence and accepts post consultation comments.

5.2 It is also noted that no information has been provided on specific emission factors to allow quantitative assessment of ultrafine particles. Whilst GATCOM acknowledges there are currently no UK regulation or standards for controlling ultrafine particles, there is growing evidence about the impact of ultrafine particles on human health. GATCOM requests that a qualitative assessment on ultrafine particles is undertaken and included in the Environmental Statement to be submitted as part of the DCO application.

5.3 GATCOM notes that the World Health Organisation (WHO) published revised guidance on ambient air pollution in September 2021, which recommends that annual average nitrogen dioxide concentration should reduce from 40 µg/m³ (which is the current UK and EU standard) to 10 µg/m³. This compares to average nitrogen dioxide concentration of around 27 µg/m³ at sites around the airport. Whilst it is accepted that the Government has not yet revised the national air pollution standards to reflect the new WHO guidelines it is important for GAL to consider the implications of any potential change in the standards in its assessments.

5.4 The continued monitoring of air quality on-airport as well as in areas in the vicinity of the airport is essential as the airport grows. GATCOM therefore requests that GAL continues its commitment to actively monitor air quality in partnership with the local authorities and to put in place a new action plan, funding and reporting arrangements, to also include the active monitoring of ultrafine particles on and in the

vicinity of the airport. GATCOM also requests that such a commitment is included in the new section 106 agreement.

6. REALISING ECONOMIC BENEFITS

6.1 GATCOM recognises the important role of the airport in maintaining a vibrant and growing economy for the Gatwick region and that it is one of the region's major economic generators bringing a wide range of benefits. This is a position that needs to be protected and supported, particularly as the airport recovers from the unprecedented impact of the COVID-19 pandemic on the Gatwick region. However, while some members of GATCOM see the potential national and regional economic benefits of Gatwick's proposals there are other members who do not consider the economic benefits to outweigh the significant negative impacts arising from the scale of growth.

6.2 GATCOM is aware that other organisations have commissioned their own economic research into GAL's assumptions on the economic benefits of and the need for the Northern Runway project, or the need for certain elements of the project, to assist with their own responses to the consultation. It is important that GAL gives full consideration to and takes account of the outcomes of those studies submitted as part of other organisations' responses in advance preparing the DCO application submission.

6.3 Notwithstanding the difference of opinions about need and scope of the project, GATCOM welcomes GAL's commitment to maximise business and economic opportunities through collaboration and contributing to "smart growth". The airport's role in acting as a catalyst to support a buoyant, healthy and green regional economy is supported. The establishment of a centre of excellence in the development and use of green technologies needs to be fully recognised and GAL's commitment to actively support initiatives needs to be fully embraced. GATCOM also welcomes GAL's commitment to develop a package of training, upskilling and apprenticeship opportunities.

6.4 GATCOM also recognises the importance of Gatwick supporting the visitor economy. Pre-pandemic Gatwick's tourism footprint was extensive with many overseas visitors entering the UK through the airport. The pandemic has had a devastating impact on the regional as well as the national visitor economy and it will be many years before the sector recovers to pre-pandemic levels. GATCOM is aware that growth of the visitor economy is a strategic priority for local partners. However, there is concern that there is a lack of reference in the consultation material on the opportunity for growth around international visitor economy and how GAL intends to work with local partners and national sector bodies to assist in supporting tourism jobs, careers and skills development.

6.5 In addition, GAL's approach to procurement should aim to maximise opportunities for local businesses, including SMEs, and to use the airport's purchasing power and influence to reach beyond its own direct needs to also deliver wider economic and social benefit.

6.6 The Outline Employment, Skills and Business Strategy introduces some promising actions including construction training programmes, business engagement and intelligence sharing, and capacity building for SMEs, together with support and obligations via GAL's procurement. However, the document is very light on detail, with most actions missing any clear commitments. GATCOM therefore expects the

Implementation Plan to provide greater detail on initiatives, targets, objectives and implementation processes, which may not be covered in this outline strategy.

6.7 Proactive engagement and investment by GAL to add real value to partner initiatives will be essential to bring about sustainability benefits. A joined-up approach to investment, coordination and shared resources, in collaboration with education providers and other initiatives is needed. GATCOM therefore wishes to see GAL's commitments backed up by legal obligations in the new Section 106 agreement reflecting priorities identified by local authorities, businesses, colleges and HE providers.

7. COMMUNITY FUNDING & SPONSORSHIPS

7.1 GATCOM welcomes GAL's commitment to continue to invest in the community as the airport grows through continued funding and sponsorship so that communities can benefit from the effects of airport growth. The current levels of funding should however be reviewed and uplifted to reflect the increased negative impacts arising from the Northern Runway project as well as the overall growth at the airport. GAL's funding commitments should also continue to be included in the new section 106 agreement.

AGREED BY GATCOM ON 26 NOVEMBER 2021

AREAS WHERE THERE IS A DIVERGENCE OF VIEWS ACROSS GATCOM'S MEMBERSHIP AND WHERE NO CONSENSUS WAS REACHED

In debating the Committee's response to GAL's Northern Runway consultation there were some matters where members had a divergence of views and did not reach a consensus. Those matters were in relation to:

- **The need for expansion:**

Some members believed Gatwick's proposals were not consistent with the requirement in the Airports National Policy Statement for it to demonstrate need for the development that is additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow. Whereas some members believed the proposals were consistent with Government policy both in the Aviation Policy Framework (March 2013) and the "Beyond the Horizon – Making best use of existing runways" (June 2018).

GATCOM previously noted during a debate in [April 2021](#), that national aviation policy is supportive 'in principle' of proposals to increase passenger numbers and air traffic movements by making best use of the existing runways at Gatwick provided any proposals are judged by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations.

GATCOM has highlighted in its agreed response that it is aware that other organisations have commissioned their own economic research into GAL's assumptions on the economic benefits of and the need for the Northern Runway project to assist with their own responses to the consultation. It is important that GAL gives full consideration to and takes account of the outcomes of those studies in advance preparing the DCO application submission.

- **Surface Access:**

GATCOM's agreed response highlights the Committee's on-going concerns about the capacity of the motorway, road and rail network to accommodate Gatwick's growth plans and remains to be convinced about GAL's road and rail assumptions. GATCOM has questioned the outcomes of GAL's assessments and has called for further assessment. However, there are some members who believe that GATCOM's response does not go far enough and wish to see GAL give a commitment that there would be no increase in the number of people accessing the airport by road. Whereas other members generally support GAL's transport plans and the ambitious sustainable mode share targets for both passengers accessing the airport as well as staff.

In addition to this, there were some GATCOM members who questioned and had doubts about GAL's figures for the number of additional car parking spaces that would be needed to meet demand created by the Northern Runway project.

It is important that GAL fully considers all responses to the consultation, including other organisation's commissioned reports assessing GAL's surface access assumptions and ambitious modal share targets.

- **Climate Change and Carbon:**

GATCOM's agreed response acknowledges that many GATCOM member organisations have serious concerns about the significant increase in greenhouse gas emissions and the impact on climate change arising from Gatwick's growth plans. GATCOM is supportive of GAL's commitment to low-carbon growth and wishes to see a reduction trajectory set and a process by which GAL's progress can be monitored and remedial action taken in the event reduction targets are not being met.

However, there are some GATCOM members that find it hard to see how the very substantial increase in emissions forecast by Gatwick can be consistent with the government's policy that aviation makes a significant and cost-effective contribution towards reducing global emissions. But not all members supported this particular view.