**APPENDIX 2**

# **Gatwick Airport consultation on the Northern Runway Project**

**Chichester District Council response to consultation**

1. **Northern Runway proposals: overall**

We are proposing to bring the existing Northern Runway into routine use alongside our Main Runway. Enabling dual runway operations and supporting increased passenger numbers at Gatwick would involve other changes, including to airport infrastructure and some surrounding roads. We have included proposals to mitigate the effects of the Northern Runway Project and maximise the benefits, especially to local economic growth and new jobs.

Q1. To what extent do you support or oppose our proposals to bring the existing northern runway into routine use?

Strongly support, Tend to Support, Neither support nor oppose, Tend to oppose, Strongly oppose, Don’t know.

Please explain your views

**A1: Chichester District Council strongly opposes Gatwick Airport’s proposals to bring the existing northern runway into use. This is because there is a climate change emergency, and the case has not been made for expansion of the airport on environmental grounds at this time. Insufficient evidence has been included for this authority to come to any other conclusion. It is aviation fuel that causes the most greenhouse emissions, but if green technology becomes the norm for aviation, then this authority would reconsider its objection.**

1. **Economic benefits: jobs and skills**

Consultation Summary Document: pages 6 to 8

We are proposing a number of measures designed to maximise employment and skills benefits resulting from the Northern Runway Project.

Q2: Do you think we could do anything more – or differently – to maximise local and regional employment and skills benefits?

**A2: The aviation industry is seeking to automate jobs and the long-term ‘job intensity’ of aviation (i.e. the number of jobs per passenger) has been falling consistently for more than a decade but this is not mentioned in Gatwick airport’s employment assertions. In addition, Oxera has failed to take account of the employment impacts on the UK tourism industry of increasing outbound tourist trips which could affect the UK economy.**

1. **Economic benefits: business and the economy**

Consultation Summary Document: pages 6 to 8

We are proposing a number of measures designed to maximise benefits to business and the economy resulting from the Northern Runway Project.

Q3: Do you think we could do anything more – or differently – to maximise benefits to business and the economy?

**A3: Many of the jobs are seasonal so this extra demand in the summer months for additional low skilled workers will put more demand on the area for housing. There is a lack of affordable housing close to the airport now, and this will only get worse with the Gatwick airport expansion proposals and lead to more commuting into the local area causing more congestion and pollution. An equivalent investment in new jobs in the green industry would make a positive rather than negative contribution to the area and allow jobs to be spread more widely across the region.**

1. **Airport supporting facilities**

Consultation Summary Document: pages 10 to 11

We would need to change or relocate some facilities to accommodate the proposed alteration to the existing Northern Runway. Some new, additional facilities would also be needed. These changes would be largely within the current airport boundary.

The current Central Area Recycling Enclosure (CARE) facilities would be relocated. We are considering two potential locations for the CARE.

1. Option 1: to the north of the cargo hall (north east of the proposed Pier 7) Do you think this location is: Appropriate, Inappropriate, Don’t Know.
2. Option 2: to the north west of the proposed Pier 7. Do you think this location is: Appropriate, Inappropriate, Don’t Know.

Q4: Please explain your views

**A4: We have no strong views over a preference.**

1. **Landscape and ecology**

Consultation Summary Document: pages 12 to 13

Our proposals include keeping green space wherever possible, protection of important environmental and community assets, improved landscaping, provision of public open space and footpaths, and the creation of new habitats.

Q5: What are your views on our landscape and ecological proposals?

**A5: The environmental benefits proposed do not outweigh the environmental costs both in construction and in use thereafter.**

1. **Land use: overall**

Consultation Summary Document: pages 9 to 19

We have aimed to develop the Northern Runway Project largely within the current footprint of the airport to minimise disruption to our neighbours and make efficient use of our land. Where we are planning to use land temporarily during construction, we are also proposing to restore it to its previous use once construction is complete.

Q6: What are your views on our approach to land use?

**A6: The approach to land use would appear to be sensible.**

1. **Getting to and from the airport: our approach**

Consultation Summary Document: pages 14 to 17

Almost half of Gatwick’s passengers already use sustainable modes of transport to get to the airport. To support the Northern Runway proposals, our transport strategy aims to continue increasing the overall share of passengers using public transport to get to and from the airport, deliver improvements to local highways and junctions, and encourage greater use of public transport and active modes by our staff.

Q7: Do you think we could do things better, or differently, to ensure all passengers and staff have appropriate choices for accessing the airport?

**A7: More cycle lanes and secure cycle bicycle parking are needed together with significant investment in public transport into the airport. A staff travel plan is needed which would take shift work patterns into consideration.**

**There is a lack of evidence on how to achieve more sustainable modal shift. The railway line and trains are already operating at or near capacity, and the overloaded local roads discourage or prevent any further uptake in cycling. Any proposal to increase the use of the airport will therefore generate a corresponding use of car travel, contrary to the Declaration of Climate Emergency.**

1. **Road improvements**

Consultation Summary Document: pages 14 to 15

We propose to significantly enhance the roundabouts at North Terminal and South Terminal (including by raising the M23 Spur/ Airport Way to take through-traffic above the existing roundabout) as well as improving Longbridge Roundabout by widening lanes to provide extra capacity. These improvements are necessary even with our strategy to promote the use of public transport and will cater for both airport and general traffic growth.

Q8: What are your views on our proposals to improve local junctions to support airport growth as well as provide capacity for local traffic? Please specify the improvements to which your comments refer.

**A8: The carbon implications of these changes must be calculated. Changes to road junctions must not be made without improvements to sustainable travel links.**

1. **Public and sustainable transport**

Consultation Summary Document: page 16

Our proposed target of 60% of journeys by sustainable transport to and from the airport by 2030 would be the highest for a major UK airport. We are proposing measures both to encourage public transport use and discourage unnecessary use of private cars by both passengers and staff. For our employees this includes promoting cycling and walking, car sharing and using zero emission vehicles where travelling by car is the only option. This describes our overall approach but there are specific things we propose in some areas, for example around Crawley and Horley.

Q9: What are your views on how our proposals for increasing use of public and sustainable transport apply in your area? Please specify the proposals to which your comments refer and tell us if there are other things we could do that would be relevant to your journeys.

**A9: The proposals to increase cargo movements will inevitably affect the strategic road network that by-passes Chichester which is already running over its capacity, with no guarantee of increased capacity beyond Chichester’s local needs.**

1. **Construction: managing impacts**

Consultation Summary Document: pages 18 to 19

We are committed to being a good and responsible neighbour throughout the construction phase, giving consideration to both the local community and managing the environmental impacts of construction activity. While still to be finalised, we have included indicative details of anticipated construction methods, timings and phasing. These will be refined throughout the Environmental Impact Assessment process, but we will seek to incorporate best practices.

Q10: Are there any particular measures or activities for managing construction impacts that you would like us to consider including in our proposals as construction details are defined?

**A10: Should the project proceed the proposed approach is supported. Care should be taken to ensure support of the circular economy so that waste can be reduced, and any waste created can be re-used or recycled nearby.**

1. **Construction: transport**

Consultation Summary Document: pages 18 to 19

We are proposing a package of measures to manage construction related traffic following best practice. This includes the routes vehicles take, the time they travel and measures to reduce the number of vehicles by re-using materials on site as much as possible. Our aim is to minimise the impacts of construction on local roads, keeping traffic on the strategic road network wherever possible.

Q11: What are your views on our construction transport proposals?

**A11: Should the project proceed the proposed approach is supported. Care should be taken to ensure that wheel scrubbers are used, to prevent soil spill onto nearby access and exit points.**

1. **Managing and mitigation effects: climate change and carbon**

Consultation Summary Document: page 23

We are proposing to mitigate increased greenhouse gas emissions associated with the Northern Runway Project with improvements in design and other measures. We are also developing a Carbon and Climate Change Action Plan that will demonstrate how we will continue to reduce carbon emissions from the airport and ensure Gatwick does not compromise the net zero UK carbon target.

Q12: Do you have any comments on our approach or suggestions for specific measures to be incorporated into the Action Plan?

**A12**: **The situation described above does not provide the whole picture. It refers only to construction and the operation of buildings, which represents only a tiny fraction of the true greenhouse gas emissions.**

**The increase in carbon as a result of the additional flights is equivalent to twice Chichester District’s whole emissions. It is possible to argue, as the Environmental Impact Assessment report does, that such an increase does not compromise the UK target, but only because it is less than 1% of UK total emissions. It is however, still a huge increase, which is so significant that it would have a material impact on the UK’s ability to meet its carbon reduction targets.**

**Carbon-offsetting is not a preferred strategy, and should only be a small part of the plan once all other options have been exhausted. The preferred strategy would be improvements in technology for the aircraft (not bio-fuels as the land is needed for food production rather than fuel), and maximising public transport journeys to and from the airport via non-carbon modes of transport. Water-efficiency and reduction of waste are other areas that need to be considered. There is little mention of creation of on-site renewable energy sources to supply the new buildings at the airport and there does appear to be land available within the airports ownership to explore this, for example ground source heat pumps and water source heat pumps.**

**There is no possible way that this proposal can mitigate its effects on climate change.**

1. **Managing and mitigating effects: noise envelope**

Consultation Summary Document: page 20

We are proposing to introduce a ‘noise envelope’ to set limits on noise from future operations at Gatwick. The noise envelope would come into effect at the start of a dual runway operation, giving residents certainty that the noise limits it prescribes would not be exceeded. This envelope would then be tightened in the future, giving residents further certainty that air noise levels would have to be lower than they were in 2019 for the full capacity of the Northern Runway Project to be realised.

Q13: Do you think the proposed noise envelope is: Appropriate, inappropriate, Don’t know.

Please explain your answers

**A13: Gatwick’s analysis of the noise impacts of its proposed expansion is inappropriate and unclear. The claim that Gatwick are making that there would be less impact from aircraft noise following expansion than was experienced in 2019 does not appear credible.**

**The concept of a Gatwick noise envelope is welcome, but the airport’s proposals are inconsistent with CAA guidance and unacceptable. They propose an inappropriate metric and limits, and have been put forward without the stakeholder discussion required by the CAA, in contrast to the approach taken by other airports.**

1. **Managing and mitigating effects: noise mitigation**

Consultation Summary Document: pages 20 to 21

In addition to the Noise Envelope, we are proposing other measures to mitigate the noise effects associated with the Northern Runway Project, including an enhanced Noise Insulation Scheme, the noise envelope, a new noise barrier at the western end of the Northern Runway, and noise barriers to support changes to the highway network.

Q14: What are your views on our approach to noise mitigation? Please specify the measures to which your comments refer.

**A14: The proposed approach appears to be reasonable. However, only a noise impact assessment would be able to quantify the attenuation to be achieved by the proposed measures.  This should be conducted before implementing any of the mitigation measures and thereafter the predictions validated.  Only then can an assessment be made if the proposed measures are practicable and be the preferred options.  As with Environmental Impact Assessments, other potential mitigation measures should be detailed including their predicted attenuation levels.  Only then can meaningful comment be provided.**

1. **Consultation process**

For this consultation we have made details of our proposals available in a number of ways, including in hard copy documents, on our project website, in a virtual exhibition and by providing opportunities to speak to members of the team. We welcome your feedback on how you have found the consultation process.

Q15: Please let us know if you have any comments about the consultation process.

**A15: The evidence is not as comprehensive or as detailed as it should have been for this consultation.**