

Dear Sirs,

Firstly, thank you for the opportunity to comment on the responses to the Secretary of State's consultation letter.

My interested party number is 20044924, and I own and live at one of the small number of properties to be named as being "significantly adversely affected" by Gatwick Airport Limited's (GAL) proposals.

I would like to take the opportunity to comment on the responses to the Secretary of state consultation, and in particular the response from GAL. My specific comments are in relation to:

- Requirement 18 as it pertains to GAL's noise insulation proposals; and
- Requirement 19 and the examining authority's proposal to place a cap on passenger numbers.

I do not agree with GAL's position regarding requirement 18 or 19. Specifically whilst I am not against expansion at Gatwick Airport per se, what I am strongly against is GAL profiting at the expense of local residents as a result of GAL putting forward inadequate proposals, and a lack of proactivity from GAL to compensate residents who will suffer in their words "major adverse effects". GAL and its shareholders stand to make billions in profit from this project, which appears to be at residents' expense, in terms of health, wealth, freedom of movement and overall well-being, and any prospect of adequate compensation is being kicked down the road by GAL.

My key comments are summarised below, but I have captured in the appendix my specific comments on the arguments set forth by GAL in the response to the Secretary of States requests.

- 1) **Inadequate Noise Insulation Scheme (NIS):** The noise insulation measures proposed by GAL are insufficient, lack specificity in implementation, ignores the needs of a so called "non-typical home" and fail to address outdoor areas like gardens or all parts of affected homes. The cap of £29,000 for insulation appears arbitrary, inadequate, and unjustified. My own experience of the current scheme has been poor, at best. Furthermore, the scheme fails to mitigate noise impacts in outdoor areas such as gardens, which are integral to residents' well-being, property value, and quality of life.

My key recommendations:

- Expand the NIS to include outdoor noise mitigation measures for spaces such as gardens, which are crucial for residents' mental health and property value.
- Increase the budget per property to reflect actual costs of comprehensive insulation.
- Include provisions for repairs and redecoration following insulation work to cover the costs borne by residents.
- Establish independent oversight to ensure the scheme is implemented fairly and delivered to a minimum standard.

- 2) **Property Acquisition:** Homes that cannot be insulated to pre-project noise levels (or adversely affected due to a loss of outdoor spaces) should be purchased by GAL at unblighted market value. Expecting residents to absorb the financial and emotional costs of these impacts — while GAL expects to make billions (the economic benefit being over £21 billion!) — is unreasonable and lacks economic sense, except where it is for the benefit of big business. GAL's resistance to property acquisition suggests they expect residents to subsidize the project at their expense!

My key recommendations:

- Require GAL to purchase severely affected properties at unblighted market value.
- Address the inadequacies of GAL's current moving cost reimbursement scheme, which caps reimbursements at £40,000. This amount fails to reflect actual market costs, including estate agent fees of 2-3% of property value and other moving expenses.
- Remove restrictions that force residents to use GAL-approved suppliers, which is anti-competitive.

- 3) **Human Rights Breach:** The project, without satisfactory compensation, violates residents' human rights, particularly:

- Article 8 of the European Convention on Human Rights (ECHR): The right to respect for private and family life, including peaceful enjoyment of one's home. Noise levels and vibrations will render outdoor spaces unusable and disrupt daily life within homes.
- Article 1, Protocol 1 of the ECHR: The right to peaceful enjoyment of possessions. Residents face diminished property values without adequate compensation which shouldn't just be considered a long way into the future.
- Article 13 of the ECHR: Freedom of movement, which will be curtailed due to property blight limiting residents' ability to relocate.

My key recommendations:

- Align the project's mitigation measures with these human rights obligations.
- Commit to property acquisitions or robust proactive compensation where residents' rights are significantly impacted.

- 4) **Passenger Cap Support:** I fully support the proposed cap on passenger numbers. This measure is essential to limit noise impacts, particularly from larger aircraft that generate higher noise levels and cause physical vibrations.

GAL's opposition to a passenger cap overlooks the compounded environmental and infrastructural strain caused by unrestricted growth. Larger aircraft, often used to increase passenger throughput, generate peak departure noise exceeding 80 dB and cause physical vibrations that disrupt residents' daily lives. Additionally, local infrastructure, including roads and public transport, is not equipped to handle the exponential growth in passenger numbers.

My key recommendations:

- Implement a cap on passenger numbers to ensure sustainable development that balances economic benefits with the rights and well-being of residents.
- 5) **Focus on Peak Noise Levels:** GAL's reliance on average noise metrics (LAeq) continues to be misleading, as it downplays the significant effects and frequency of peak noise levels, which often exceed 80 dB for residents in the inner noise zone. By aggregating noise data, GAL's projections fail to reflect the real-life impacts on affected residents.

My key recommendations:

- Any assessment needs to consider more than just the LAeq metric and put more weight on peak noise events and their frequency.
- Conduct real-world noise assessments in more locations to validate the projected impacts. To this end, I would warmly welcome any of the examining authorities, secretary of state or GAL to witness this first hand in my home, so that they can understand the impact on residents.

Conclusion

GAL's proposals fail to sufficiently address the implications of noise, offer adequate compensation, or consider the broader impact on residents' well-being. The NIS and Assisted Moving schemes are deficient, lack specific detail. Residents must not bear the financial and emotional burdens of GAL's expansion for corporate profit.

If the airport expansion is approved, I would urge the Secretary of State and examining authorities to ensure that GAL adopts fair and comprehensive mitigation measures, including:

- Expanded and independently overseen noise insulation schemes.
- Fair compensation and property acquisition policies.
- A cap on passenger numbers to protect local infrastructure and residents' quality of life.

Many thanks

Steve

Appendix of comments

Requirement 18:

Comment No	Applicants comment / position	My comment / position
1	In response to the Examining Authorities comments and revisions, GAL have stated that “the draft requirement is directly inconsistent with all policy, practice and precedent (in airport inquiry decisions or Noise Action Plans sanctioned by Government) that has been applied to other airports. “ and further “The requirement for GAL to offer to purchase properties where the local authorities does not agree to its noise insulation levels cannot surely be seriously proposed”	<p>I totally agree with the examining authority, that if a house (particularly in the inner zone) cannot be appropriately insulated to the pre project levels (i.e. as if the proposed expansion were not to proceed), then Gatwick should be under a compulsion to acquire such a house at unblighted market value.</p> <p>This seems an entirely fair and reasonable expectation in view of individual human rights and specifically :</p> <ul style="list-style-type: none"> Article 8 - “Everyone has the right to respect for his private and family life, his home and his correspondence.” <ul style="list-style-type: none"> It is my view that the project will breach my right to enjoy my home peacefully without intrusion from noise, physical vibrations, and environmental pollution, e.g. no longer being able to use outdoor spaces, being more frequently awoken or disrupted by aircraft and the vibrations they create Article 13 – freedom of movement – where properties are subject to material reductions in value because of blight, this will curtail an individual’s ability to move residence. Article 1 of the first protocol – “Protection of property - Every natural or legal person is entitled to the peaceful enjoyment of his possessions.” Which will be materially impacted on if this project were to proceed. <p>Further in response to GAL’s assertion that the draft requirement is inconsistent, I respectfully would add that just because something has not been done before doesn’t invalidate the reasoning behind it! If policy was never to change for the better and keep up with the times then we’d still be living in a world where women don’t have a right to vote!</p> <p>Finally, if GAL are of the view that residents will not be financially disadvantaged, then why are they so against the idea of acquiring affected homes at market value? This by itself</p>

		indicates that GAL expect residents to bare some of the financial consequences of the project, and hence subsidise shareholders.
2	GAL state that “Gatwick’s existing noise insulation scheme has a long track record of successful implementation. Local authority approval is not currently required at Gatwick and is not normal or necessary elsewhere. There was no evidence before the examination that the existing arrangements are unsatisfactory.”	<p>I disagree with this statement. My experience of the existing scheme was not satisfactory or pleasant and I highlighted this in two responses I have submitted as part of the consultation as well as through a complaint to GAL’s contractor.</p> <p>For completeness: My experience, having used the current scheme, is that I have very little confidence in its success. The current operators of the scheme took a deposit and didn’t contact me for over two and a half years! It then took daily chasing of GAL’s current supplier over a period of 6 months, for the current suppliers of GAL’s noise insulation scheme to fit and supply my current windows. GAL need to offer alternative suppliers or guarantee a level of delivery and service.</p> <p>The current suppliers of my windows under the scheme left my property damaged from having installed the windows – They claimed that this is not covered by their work or the scheme and would be at my expense. I am now left with damaged interior and exterior walls that need redecoration. The scheme makes no reference to how this would be funded.</p>
3	Gatwick state “The regime suggested in the draft requirement 18 would not only have significant resource implications for local authorities and for GAL but would represent a completely uncapped liability for the airport.”	<p>I do not understand this statement.</p> <p>There are a defined number of properties in the area affected with a defined market value, therefore the liability could be quantified and will have an upper limit.</p> <p>It would not seem an unreasonable request to ask GAL to provide an estimate of the expected loss to residents on market values of properties vs the financial consequences for the project.</p>
4	GAL state “The requirement for GAL to offer to purchase properties where the local authority does not agree its noise insulation proposals cannot surely be seriously proposed.”	<p>The point here is that GAL should be required to offer to purchase a property. Whether individual homeowners decide to accept any offer, should be at their individual discretion.</p> <p>Further, it is my view, that a doubling in the noise levels as predicted by GAL from 63db to 66db no matter what basis of insulation is offered will significantly adversely affect my health</p>

	<p>and</p> <p>“Requiring GAL to purchase properties at these and far lower noise levels is not consistent with that decision, or necessary.”</p>	<p>and wellbeing. It is my view that a doubling of the noise as arising from a 3db increase is significant and should warrant more than the inadequate noise insulation program proposed by GAL, particularly considering the billions of profit the airport is likely to make if the project were to proceed.</p> <p>GAL’s assertion that property acquisitions are unnecessary disregards the significant impacts on affected residents! As an affected resident facing significant financial loss, I respectfully disagree! If there is to be a material reduction in my living standards, then why should GAL not consider it necessary? The mitigants being proposed are not comprehensive to the extent that the individual is being penalised at the expense of big business, both in terms of my health, wealth, freedom of movement and wellbeing, and I am ultimately being asked to subsidise the project through a material reduction in my living standards!</p>
5	<p>GAL state “It is so far removed from any precedent or policy requirement that GAL considers the proposed wording to be totally unreasonable and irrational. A requirement to offer to purchase properties could only be policy compliant if it related to much higher noise levels (UAEL) i.e. at least 71 dB LAeq 16h. However, the Project would not create new noise affected properties at or above that level.”</p>	<p>Whilst on an average LAeq basis the projections show no new noise affected properties, these are only projections based on modelling, which suffers from numerous flaws.</p> <p>To the extent that actual noise levels approach close to 71db will GAL commit to such a proposal to offer to acquire houses?</p> <p>Further, whilst the average LAeq figures at my home may not reach 71db, the noise levels that I will experience from individual aircraft departures do currently and will (if the project goes ahead) far exceed 71db, and in fact regularly hit 80+db. It is still not clear to me why the project does not consider the absolute levels of noise reached, as this will clearly increase materially.</p>
6	<p>Within the section labelled “the Applicant’s NIS proposal is appropriate” Gatwick have highlighted a number points about the insulation scheme including: “The Applicant considers that its NIS as submitted in the examination [REP9-059], with its four defined zones, would produce acceptable internal noise levels in accordance</p>	<p>I disagree that the NIS is fit for purpose. Specifically:</p> <ol style="list-style-type: none"> 1) This insulation program provides no mitigants to the noise in my garden, which will be unusable if the project was to proceed. My garden is crucial for my mental health, for entertaining friends (e.g. a bbq), as a leisure space, can add 20% to the value of a property and is also crucial to reselling a home and its marketability. Given the proposals will make this space unusable, the lack of any proposals to mitigate the loss of such a crucial space is unjustifiable, and I’d encourage all parties to consider these impacts on the individuals affected;

	<p>with policy, and would thus meet the intent of the proposed requirement whilst remaining proportionate and appropriate.”</p> <p>and in conclusion state</p> <p>“The Noise Insulation Scheme submitted with the application and refined through consultation and the examination, achieves and exceeds all policy requirements and objectives. It remains fit for purpose and does not need to be reinvented.”</p>	<ol style="list-style-type: none"> 2) The insulation proposals from Gatwick have several failings which have not been adequately addressed, particularly for those in the inner noise zone. Specifically, the cap proposed of £29k is arbitrary and unjustified, the necessary work should be undertaken at Gatwick’s expense; 3) Every part of my house is used daily, therefore limiting insulation measures to key rooms is insufficient; 4) The proposals also don’t include any allowance for redecoration after any works are complete which will be necessary and could be significant. This will be costly both in terms of materials, but also time and stress! and 5) The proposed NIS fails to address non-typical homes or outdoor spaces. <p>Whilst the NIS has been subject to some consultation, it is my view that this has been rushed, for example the scheme has had several revisions, but the most recent was submitted very late in the examination phase.</p> <p>The Noise Insulation Scheme must be expanded to address the unique needs of each affected property. Current provisions fail to account for:</p> <ul style="list-style-type: none"> • Noise levels in outdoor spaces, such as gardens, which are crucial for mental health, leisure, and property value; • Comprehensive insulation for all rooms in a home, not just those deemed ‘key’ by GAL; and • Repairs and redecoration following insulation work, which residents should not bear out of pocket. <p>Residents deserve a scheme that addresses these shortcomings, ensuring their living standards are preserved in the face of such significant change.</p>
7	<p>GAL have prepared a short table that:</p> <p>“considers each 3dB range of external aircraft noise levels predicted from the Project, and for each NIS zone subtracts the effect</p>	<p>This table is misleading for several reasons.</p> <ol style="list-style-type: none"> 1) There is no definition of what typical is; 2) The NIS will have no effect in my garden; 3) The NIS as written will have no effect in rooms that GAL state isn’t eligible but which I regularly use;

	<p>on noise levels of sound insulation for typical homes that is offered in the NIS, to estimate the approximate internal levels that would result for typical homes, which are then described using descriptors derived above.”</p>	<p>4) Downplays the effects of absolute noise, as has been argued by many interested parties; and</p> <p>5) Requires the NIS to be able to achieve a 35db reduction, which cannot be guaranteed.</p> <p>To form judgments based on a typical home is therefore misleading and ignores the effects on those residences who are no “typical”.</p> <p>The table is also based entirely on the LAeq measure which does not capture the peak noise levels experienced. I currently experience peak noise levels of close to 85db from departing aircraft – so whilst mathematically accurate, the suggestion put forward by GAL in the table is entirely misleading.</p> <p>GAL have previously stated that some rooms may not be able to be insulated. To the extent this is the case and impacts on the useability of a home, how do GAL expect to rectify such issues?</p>
8	<p>GAL state that “In the Inner Zone, for a typical large home, all windows would be upgraded and, if necessary, the bedroom ceiling would be improved within a sum of £26,000, but the Applicant has provided within the NIS for this sum to be increased if necessary and, subject to survey, to provide the specified insulation measures.”</p>	<p>It is not clear how this figure has been derived, and it leaves only £3k vs the proposed cap from GAL.</p> <p>Further, if acoustic ventilators and blinds are to be provided, thermal insulation, there appears very little additional “budget” to achieve this? Can this be reasonably provided for £3k?</p> <p>As noted earlier, it also appears to me that any redecoration arising from installing such measures will be at the homeowner’s expense. Why?</p>
9	<p>In the response it highlights that “Hence, with the package of noise insulation, acoustic ventilators and blinds prescribed in the NIS and the sums allowed, the Applicant has proposed a NIS that will ensure for</p>	<p>In summary, this paragraph says that if resident’s properties cannot be insulated “tough luck”.</p> <p>This in my opinion is totally unacceptable!</p>

	<p>typical houses ‘good’ or ‘reasonable’, and certainly ‘acceptable’, internal living conditions will be provided.”</p> <p>There may be a small proportion of homes that are not typical, for example homes with acoustically poor walls or other building elements, for which higher internal noise levels may be unavoidable without major building works which the Applicant cannot reasonably be expected to fund.</p>	<p>I do not understand why residents should be worse off in any way because Gatwick want to increase their revenue and profits.</p> <p>No resident should see any reduction in their living standards, and in my opinion, this represents a breach of various human rights.</p> <p>This is exactly the scenario where GAL should be acquiring the property at unblighted values. GAL will have the ability to then realise a residual value on the open market!</p>
10	<p>In GALs proposed amendments, they have continued to propose a house moving scheme and specifically</p> <p>“eligibility to receive a payment covering reasonable moving costs, estate agent fees up to 1% of the sale price and stamp duty (up to a maximum combined total of £40,000) where requested by the owner, subject always to such entitlement being strictly limited to one claim per eligible residential premises.”</p>	<p>The current moving cost reimbursement scheme proposed by GAL is both inadequate and restrictive.</p> <p>The cap of £40,000 fails to account for actual market costs, which, according to industry estimates (e.g., Zoopla), include estate agent fees of 2–3% of a property’s value, stamp duty, and additional moving expenses. Moreover, requiring residents to use GAL-approved suppliers is anti-competitive and creates unnecessary barriers for homeowners. To ensure fairness, the scheme must:</p> <ul style="list-style-type: none"> • Increase the reimbursement cap to reflect current market norms; • Allow residents to choose their own suppliers without restrictions; and • Guarantee full coverage of all reasonable moving costs, including unforeseen expenses. <p>In summary homeowners who do not like the imposition of the new runway are being asked to subsidise the effects of the project.</p> <p>It is my view that this scheme should indemnify the residents against a loss and reasonable costs arising from this imposition if GAL are not prepared to acquire affected homes.</p>

Requirement 19:

Comment no	Applicants comment / position	My comment / position
1	<p>The Applicant notes the suggested imposition of a passenger throughput limit. By reference to the Applicant's submissions on this matter in the examination [REP9-111], (in response to the ExA's same change to this requirement), such a measure is not considered to be necessary or reasonable given the other measures already secured in the DCO to manage the effects of passenger numbers. The Applicant believes that a passenger cap limits and prevents efficiency and runs counter to Government policy of making best use of existing facilities, whilst stifling growth of nationally important infrastructure.</p>	<p>The examining authorities have proposed a cap on passenger numbers and a sharing of the benefit from improvements in aviation efficiency. I agree with the principles of this argument and would add in support that allowing bigger aircraft to increase passenger numbers represents a real concern.</p> <p>GAL's argument against a passenger cap overlooks the compounded environmental and infrastructural strain caused by unrestricted growth. Larger aircraft, often used to increase passenger throughput, generate noise levels significantly higher than smaller aircraft, with peak departure noises exceeding 80dB and causing physical vibrations in affected homes. Furthermore, local infrastructure, including roads, public transport, and utilities, is not equipped to handle the exponential growth in passenger numbers. A cap would ensure sustainable development, balancing economic benefits with the rights and well-being of residents.</p> <p>It is larger aircraft that create the most noise, and it is the largest aircraft that cause my house to literally shake.</p>