

Dear Secretary of State

Re. PINS Ref. TR020005 – Final Comments from Keep Southwater Green (Interested Party Ref. 20047019)

We have been invited to provide final further comments on the representations received in response to the consultation letter of 9 December 2024, and particularly wish to do so in relation to those received from the Applicant for development consent (Gatwick Airport Ltd – GAL), in order to contest its claims concerning the planning requirements set out in Schedule 2 (Annex A) to that letter.

With respect to Requirements 15 (Air noise limits) and 18 (Receptor-based noise mitigation), we wholly endorse the finding that aircraft noise is a major issue at Gatwick, and that the suggested area to be covered by the mitigation strategy should cover 54dB summer day-time and 48dB summer night-time, though we would add that noise can also impact residents living far beyond these noise contours. We therefore reject the Applicant's self-serving counter-proposals and support the stated requirement to insulate all properties and noise-sensitive buildings within the noise 'envelope' within 12 months, but would wish there also to be included compensation for loss of property value due to aircraft noise. We are also concerned that the increased noise and air pollution impacts of the project on nearby Protected Landscapes should be fully considered, as required in the DEFRA guidance (cited in the consultation letter of 3 January 2025), which advises that the amended statutory duty to 'seek to further the purposes' of these designated areas applies also to decision making in respect of nationally significant infrastructure projects.

We would consequently question the Applicant's claim that having to comply with Requirements 15 and 18 as now amended would threaten the economic viability of the Project, as we consider the economic evidence previously submitted by GAL to be questionable, given that it presupposes airspace modernisation (FASIS) without which the Airport will not reach its target through-put of passengers and aircraft (even if otherwise unaffected by flight number reductions resulting from for example higher ticket prices depressing future travel demand).

With respect to Requirement 10 (Foul water drainage), we support the proposal that an on-site sewage treatment plant should be a mandatory pre-condition for any expansion of the Airport, given that Thames Water has well-known financial difficulties and admits to having little extra capacity.

With respect to Requirement 25 (Operational waste management), the ministerial ruling on incinerators and associated lorry movements provides an additional reason for waste from the Airport destined for off-site disposal to be included in GAL MasterPlan Scope 3, not ignored or included in Scope 2.

With respect to Requirement 19 (Airport operations), the Applicant's opposition to any limit on annual aircraft movements or passenger throughput should be rejected on the grounds that such caps already exist with respect to night flights at the other London airports.

With respect to Requirement 20 (Surface access), we reject the Applicant's counter-proposals and endorse the support for the present amendments expressed in their joint representation by Crawley Borough and West Sussex and Surrey County Councils, as providing greater certainty that the Commitments, especially those relating to the transport mode-share targets, could be delivered, provided that appropriate measures are in place to ensure ongoing compliance (beyond what the Transport Forum Steering Group could provide). It is moreover a matter of concern that GAL appears totally reliant upon third parties to implement its sustainable transport plans (admitting to 'factors outside' its control: p. 3), with no proposals for its direct investment in local roads, or to cover the costs of the operational impacts of two runways on local road and rail capacity - other

than a token contribution of £10m towards mitigating the impact of the project on the rail network (required by Commitment 14A).

Yours sincerely,
P. G. Carder
Hon. Secretary & Treasurer,
Keep Southwater Green