

**From:** [Lee Martin](#)  
**To:** [Gatwick Airport](#)  
**Subject:** Gatwick Airport Applicant Compliance with Regulation (EU) 598/2014: Response- 9th June  
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I hereby add my comments as an interested party with reference to Gatwick Airport's response to the Secretary of State's initial decision on expansion/ use of Emergency Runway and compliance:

I object to the proposed expansion of Gatwick Airport. If the government does approve expansion, it should be subject to strict environmental, noise and other controls.

Firstly, Gatwick Airport must meet its required **noise limits, carbon limits** and **surface access mode** share. The meeting of all these requirements should all be linked to the annual permission from the government to allocate slots at the airport. However the proposed **noise** limits, even as amended by the Secretary of State, do not achieve the policy requirements that the benefits of growth should be shared between the aviation industry and local communities and achieve a balance between growth and noise reduction. To achieve the policy the limits should be reduced further at a pace and to an extent that achieves a genuine sharing of the benefits of growth or the government should mandate alternative noise benefits. Expansion should be accompanied by a ban on all night flights as mandated for Heathrow. There should be noise limits for all periods of the year, not just the peak summer period. There should be an agreed process for renewing noise limits downwards over time.

**Surface Transport:** If the surface transport volume differs to that which is modelled, Gatwick must fund measures to accommodate that change. Therefore, I agree that there is a need for greater committed investment by Gatwick in public transport and not just road widening. I do not support the alternative metric of number of cars travelling to and from the airport as suggested by GAL. Off airport parking, authorised or unauthorised, must be excluded from sustainable transport modal share figures. Gatwick have still not substantiated their estimates of future business travel which was highlighted by the ExA in their report. Gatwick have also failed to include the DfT and BEIS-approved adjustment for non-CO2 emissions (not even in their most recent submission on 24 April 2025) which increases the environmental cost of the scheme by a further £4bn. Together, these changes mean that the expansion has no net economic benefit as stated in submissions by the New Economics Foundation. Gatwick again claims a positive benefit due to inbound tourism but have still failed to quantify the far greater GVA (economic dis-benefit) of outbound tourism from Gatwick, which would add further to the negative GVA from the development. The expansion of Eurostar should be prioritised before expansion of London airports. Eurostar's expansion plans would increase train capacity by 2.5 times, which would limit the need for London flights. This should be reflected in the assessment of need and the SoS decision.

**Climate Change:** Greenhouse Gas Emissions of this scheme will increase by a significant amount (considering all increases in carbon emissions and the risk Jet Zero projections are not materialised) at a time when emissions must be reduced. The proposed development would lead to one of the largest net negative impacts on the climate of any decision taken in the UK in the 21st century to-date; with no mitigations proposed that would remove that impact. The greenhouse gas emissions should therefore be judged as major adverse, and similarly should be

judged to give “major weight” to greenhouse gases against the proposed development in the planning balance.

**Water Management:** It is expected that as future demand will continue to increase (due to housing as well as the Gatwick Airport future baseline case) and Thames Water will continue to operate the STWs around Gatwick with inadequate capacity for many years to come – even without the potential need to accommodate Gatwick expansion. The revised form of Requirement 31 is judged inadequate. It risks completely failing to address the Horley Sewage Treatment Works (STW) capacity shortfalls that still remain going forward. The new GAL-Thames Water agreement contrasts capacity increase needed by Gatwick to current rather than future increased capacity needs around the airport.

Finally, it is clear that the applicant (Gatwick Airport) is making a mockery of the planning process, by introducing a third scheme outside of the examination time frame. I urge the Secretary of State to demand that noise and surface transport be re-examined and that the planning process be halted and re-instigated, to allow for full and transparent examination of the facts to ensure Gatwick Airport’s new runway does not cost the planet, communities and the public purse dearly.

Lee Martin

