Representations on: **Gatwick Airport Northern Runway Examination Additional Information Consultation Consultation Date: 28th April 2025 – 9th June 2025.**

On behalf of: **The Nevill Family**

Date: **6th June 2025**

Introduction and Overview:

The following submissions are made on behalf of the Nevill family in respect of the Gatwick Airport Northern Runway proposals by Gatwick Airport Limited (hereafter referred to as GAL). They are submitted to the Secretary of State (hereafter referred to as SoS) through the Planning Inspectorate.

As longstanding residents and custodians of large scale land holdings and property south of Tunbridge Wells within the High Weald National Landscape (Previously referred to as Area of Outstanding Natural Beauty) the family has a keen interest in the proposals which would result in changes to airport operations and associated over flying of their landholdings and environs, much of which is highly sensitive in landscape terms and carries the very highest ecological and biodiversity value. The landscape and ecology have evolved over many centuries and is recognised through a variety of designations including National Landscapes, Special Area of Conservation (SAC), Sites of Special Scientific Interest (SSSI), Sites of Nature Conservation Interest (SNCI), and Lichen Assemblages of Eridge Park SSSI as referred to in the Lichen Survey of Eridge Park SSSI, East Sussex (April 2023).

The family is very concerned regarding the environmental impacts and noise pollution leading to harm and damage to the many sensitive habitats. The need to balance responsible economic growth with environmental effects is recognised but there is real concern that the Northern Runway proposals will have serious and grave impacts on interests of acknowledged importance. With that in mind, it is quite clear that the Airport could seek to evolve in a more responsible way by making best use of existing spare capacity and advancing technology. At the national level, we understand that the Government is currently re-visiting the longer-term strategy for air travel to ensure that future provision for the UK is not unduly dominated by two airports within the South-East.

As it stands, the Civil Aviation Authority (hereafter referred to as the CAA) published passenger numbers for UK airports show that in 2024, London airports handled 177 million passengers, whereas those outside

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London handled 115 million passengers, therefore some 60.7% of air passengers using UK airports passed through London (Size of UK Airports 2024 CAA, Table 1. Page 1). Making air travel even more London - Southeast centric would reinforce and increase the disparities in economic performance between different regions and would do little to benefit the wider needs of the country as a whole and the long-held aspiration of 'levelling up'.

This is despite there being significant excess capacity at other regional airports in the UK, notably, at Birmingham where its runway operates at about one third of its operational capacity and, with suitable upgrades to the terminal building and supporting facilities could handle well in excess of 30 million passengers a year rather than the 18 million currently forecast by 2033 (source: birminghamairport.co.uk). This would tie in with the delivery of the High Speed 2 rail link to Birmingham. The new route will greatly reduce journey times from London and is currently forecast to complete by 2033. Birmingham Airport will be served from the new Birmingham Interchange railway station via a 1.4-mile link, with a new elevated automated people mover. Employing a 'joined up' approach would best serve the national interest by beginning to redress existing economic and infrastructure imbalances between regions.

These representations made on behalf of the Nevill family, are in response to the further information provided by the SoS and GAL via the Planning Inspectorate on 28th April 2025. The comments requested are regarding several matters which have been identified by the Secretary of State (hereafter referred to as SoS) through the examination period. The matters include but not limited to:

- Air Noise Limits;
- Receptor Based Noise Mitigation: and
- Environmental Considerations.

Similar to previous submissions of representations on behalf of the Nevill family, the above matters are of relevance to concerns identified and are updated within these representations in response to the additional information provided by GAL dated 24th April 2025.

Although these representations have been prepared in line with the additional information provided, concerns previously raised remain true today and therefore have been updated and carried over for continued consideration throughout the examination of the Northern Runway Application. For ease of presentation and clarity, these submissions are separated out into 1) Original Submissions 27th October 2023, 2) Additional Information Matters and Response to Secretary of State letter dated 27th February 2025 and 3) Lichen Survey of Eridge Park SSSI – East Sussex – April 2023.

1. Original Submissions 27th October 2023:

Sustainable growth

The Gatwick Airport Limited (GAL) Planning Statement states the proposals would enable the airport operations to expand to a cap of 386,000 air traffic movements (ATM's) by 2047. This is a 36 per cent increase compared with the 2019 figure, immediately prior to the pandemic. However, the CAA data for 2022 shows Gatwick passenger numbers for that year were down by some 30 per cent compared with 2019 – the biggest fall of any of the busiest 10 UK airports (Heathrow and Stansted for example being at 76% and 83% of 2019 levels, respectively). The Planning Statement refers to Department for Transport statements in general terms (without specific citation) stating that Heathrow and Gatwick are already 'full'. However, it is not clear whether these forecasts date from pre-Covid 19 pandemic and, therefore,

are outdated. This Statement, suggesting a lack of general capacity is clearly incorrect since 2.5.5 of the planning statement states 'even without the Northern Runway Project Gatwick will continue to experience Growth in passengers and air traffic movements.' In this baseline scenario the Statement confirms that the airport would be able to handle 326,000 commercial air traffic movements in 2047 reflecting an increase of about 10% compared with 2019 throughput.

It would seem to us, even without scrutiny of the 10% figure to see if this genuinely represents the upper limit of baseline growth (i.e. without northern runway), that even a 10% growth in the scale of London Gatwick Airport operations is a significant quantum. This level of growth and above, will have serious and very real impacts on those living within the vicinity of the airport and moreover on the most sensitive and valued landscapes and ecological interests. The latter is addressed below.

The unbridled growth that would arise from the addition of a second operational runway would represent a 'predict and provide' approach purely focused on possible future demand and without in our view appropriate regard to broader environmental constraints. Moreover, this single minded commercially driven approach is completely at odds with wider Government commitments on measures to combat climate change – including the legal responsibility to reach net zero by 2050.

In view of this, the robustness of the case for the proposed additional runway falls into question. In this vein, we seriously question whether the scenario of making best use of the existing runway has been fully tested, and whether the 10% figure referred to above is sufficiently ambitious and has appropriate regard to likely improvements in technology: particularly given the extended period until 2047 and the rapid and increasing pace of technological change.

Environmental effects upon northern East Sussex / West Kent borders and Ashdown Forest SPA/SAC

Significant areas of the family's landholding lie adjacent to the Ashdown Forest Special Protection Area and Special Area of Conservation – two of the very highest environmental protection policies which reflect the international significance of the Forest and its wider setting in the High Weald National Landscape. Large parts of the Ashdown Forest (some 2,729 hectares) are designated as a Special Area of Conservation (SAC). The SAC status was awarded because Ashdown Forest contains one of the largest single continuous blocks of lowland heath in south-east England.

The SAC designation recognises the special nature of the vegetation found within Ashdown Forest, namely European dry heaths and North Atlantic wet heath and affords it legal protection by the Conservation of Habitats and Species Regulations 2017 (as amended) which transposes the requirements of the European Habitats Directive (92/43/EEC). The main threat to the SAC relates to air pollution and this has been a key factor in development decisions in the wider region for some time.

Some 3,205 hectares of the Forest are awarded the SPA status - for a number of qualifying individual species that include the Dartford Warbler and Nightjar that the SPA supports during their breeding season. These areas are therefore highly sensitive to change in air quality and pollution, and noise pollution, the combination of which will rise considerably through the airport expansion proposals.

Gatwick Airport Limited's own literature ("Gatwick Airport – Aviation Noise Information") states that around 70% of aircraft operations are in a westerly direction, owing to the need to land and take off into the prevailing wind. Additionally, the document states "aircraft arriving at Gatwick Airport will mostly be joining the Instrument Landing System (ILS) from the south due to airspace restrictions caused by the

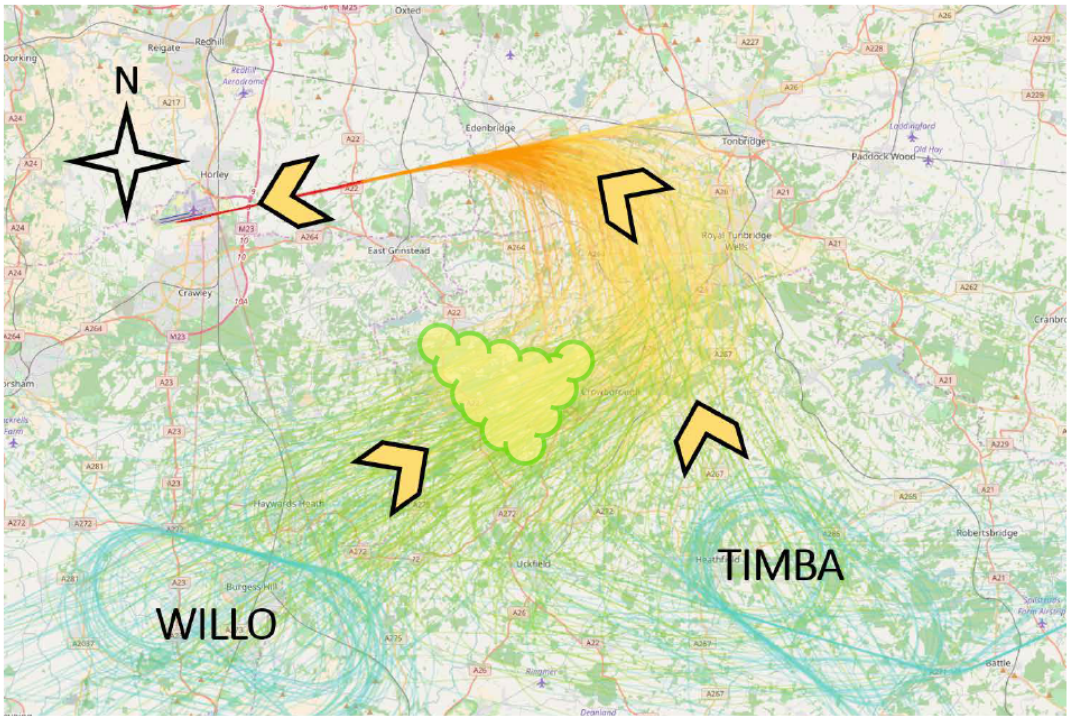
proximity of Air Traffic associated with Heathrow Airport to the north, and other airspace restrictions" (p.14).

Additionally, the document states "unlike departing aircraft that have set routes to follow during the initial stages of flight, there are no such defined routes leading to the final approach for inbound aircraft neither are there any noise limits or fixed heights". Furthermore, "there are no financial sanctions against airlines that fly "off track" as there are many factors including wind, speed, weight and temperature that can affect the performance of an aircraft".

Given the constraints, and established bias of landing aircraft approaching from the south and east of the airport, it is understandably of significant concern that the areas within and surrounding the Ashdown Forest within the East Sussex / Kent borders will experience significant increases in overflying as an inevitable consequence of the planned increase in aircraft movements. As stated in the applicant's own literature these are unfettered with little or no environmental controls over operation and virtually no sanctions. This is entirely unacceptable and will undoubtedly lead to environmental harm and impact on those living within or near the flight paths. Furthermore, the lack of effective environmental controls over aircraft prior to final approach casts doubt on whether it is possible to accurately assess and predict the 'real world' impacts of the proposed significant increases in aircraft traffic.

The visual below is from the Gatwick Airport "Aviation Noise Information" publication and shows the typical flight patterns of a day of aircraft arrivals. To this, we have added, schematically, the outer extent of the Ashdown Forest areas by the simple light green 'bubble'. Whilst approximate it clearly demonstrates the significant number of aircraft passing over the Forest, and indeed large parts of the Nevill Estate, which extends beyond the SPA boundary, north-eastwards towards Tunbridge Wells and over the sensitive and protected environs of Eridge Park.

A typical day of arrivals, on westerly operations



We note that East Sussex County Council in their representations dated 24th October 2023 made the point that the various reports prepared by Gatwick Airport Limited suggest properties in areas with flight paths exceeding 7000 ft. would not be affected. However, the typical elevation of the Ashdown Forest is 700ft., and Crowborough is about 800ft above sea level, therefore reducing the 'net' aircraft flying level. Using digital plane tracking data, it is clear that many of the planes are flying well below an altitude of 5,000 feet in these areas. We are therefore concerned to ensure all of these environmental factors have been appropriately included within the Environmental Assessment, in relation to impacts upon Air Quality, Noise, and indeed health.

The County Council has asked for clarification regarding what the applicant considered to be 'minor adverse significant effects' on the Ashdown Forest. We would support this request, as it clearly ties into concerns as to whether the effects have been fully and robustly considered, having regard to the sensitivities of these areas.

If, notwithstanding these significant concerns, the runway proposals proceed, it is imperative that night flights at the Airport do not increase, and that the northern runway is not used for any additional night flights - this is essential.

2. Additional Information Matters & Response to Secretary of States Letter of 27th February 2025

Matter 1

It is noted within the first matter of the additional information provided that the SoS has requested the consideration of reducing the 51dB daytime air noise contour from the proposed 135km^2 to 125km^2. GAL are reluctant to do so due to disparities within the analysis providing the basis of this request. GAL have highlighted three 'errors' within Annex 1 (Applicants response on requirement 15 (Air Noise Limits)). These errors are based on 3 technical details which include for example the generation of aircraft (age) and the effects of these technological advancements. Notwithstanding disparities in analysis, both the applicant and SoS must take into consideration the consistent increase in the noise contour area with the subsequent increase in population and area affected by increased noise levels.

The Civil Aviation Authority concluded within their Noise Exposure Contours for Gatwick Report 2023 that there was a 28% increase in km^2 area of 51dB noise exposure between 2022 and 2023. With the initially proposed 135km^2 increase as part of this application, it would mean another 20.5% increase in area from 2023 figures. In turn this would increase the population affected by the proposals by a similar figure. This significant increase in noise level area and the subsequent increase in volume, because of the use of the northern runway must not be overlooked and robust mitigation and/or justification should be issued (See matter 2 below).

Matter 2

The second matter issued is regarding receptor-based noise mitigation and more specifically a noise insulation scheme. The scheme proposes a tiered scheme providing financial compensation for properties within 60dB down to 54dB contours with uncapped contributions for those within 60dB and above contours.

Whilst this is a positive step for the likes of residential properties and the local population, the mitigation measures dismiss that of the wider 51dB contour areas. Although it is appreciated that 51dB is a lower noise level in comparison; as noted by both the applicant and the SoS, noise levels of 51dB are still within the lowest adverse effect level (LOAEL). In view of this, consideration must be given on the basis that adverse effects will occur:

'LOAEL – Lowest Observed Adverse Effect Level: This is the level above which adverse effects on health and quality of life can be detected'.

Again, in line with commentary on matter 1, consideration must be given to the continued increase in the noise contour area. It is disappointing that this has not been considered within the applicant's response to matter 2 of the SoS request.

3. Lichen Survey of Eridge Park SSSI – East Sussex – April 2023.

The Nevill Estate have been longstanding custodians of areas of both high landscape and high ecological value which is underpinned by designated areas of National Landscape and Sites of Special Scientific Interest. It has been well established previous detailed representations on behalf of the estate and through numerous local development decisions that air pollution is the main threat to areas of high ecological value such as Ashdown Forest which is designated as a SAC.

Eridge Park, is a historic park located just northeast of Crowborough in East Sussex and is designated as an SSSI, a Nature Conservation Review site (Grade I) and is Grade II listed on the register of Historic Parks and Gardens of Special Historic Interest in England. Obviously therefore, this historic park is extremely sensitive for its landscape value and its abundance of rare ecological features. The site is, therefore, very susceptible to the detrimental impacts caused by increased aircraft movements and air pollution.

Eridge Park SSSI has long been known for its rich epiphytic lichen assemblage which is associated with numerous veteran trees within the park. The lichen assemblage at Eridge Park is of international importance for its overall old growth woodland assemblage (N A Sanderson, April 2023). It was also previously described as "by far the richest remaining site for lichen epiphytes of ancient forest in England east of the New Forest" (Rose, 1995). Considering this, in April 2023, a lichen survey of Eridge Park SSSI was undertaken that assesses the conservation importance of the SSSI.

The report extends to 172 pages – the relevant extracts at paragraphs 3.1.3 and 4.3.5 are attached as Annex 1 to these representations and state that previously, the area was subject to significant acidification from sulphur dioxide pollution in the mid to late 20th century. It has been noted that it is remarkable that the site survived at all let alone being merely damaged. Since then, sulphur dioxide pollution has subsided and there has been evidence that sensitive lichens have been recovering. It is essential therefore, that the status quo is maintained, and that further pollution is minimised.

The report suggests that an alternative form of air pollution is now slowing down the recovery of the lichen from its past acidification. This air pollution is attributed to the deposition of nitrogen oxides from transport sources, including, in particular the high volume of planes landing at Gatwick.

With the impacts of aviation being evident at its current level of traffic as highlighted by lack of recovery at Eridge Park, it is clear that the further increase in traffic associated with the proposed use of the northern runway will exacerbate the issue of recovery at Eridge Park SSSI.

The Lichen report suggests that the aim of reducing air pollution, whether that be deposition of nitrogen oxides or acidification, is a policy issue which needs to be dealt with at a regional and national level. Considering that the proposed development is nationally significant, the onus is on the developer (GAL) and the decision maker, in this instance the SoS, to consider the impacts the increase in air traffic would

have on key ecological features such as this SSSI, and carefully and responsibly mitigate against these to ensure that issues which are present today are not intensified in the future.

Concluding remarks:

In closing, we are concerned that the areas in and around Ashdown Forest and the wider East Sussex / West Kent (Tunbridge Wells) borders, all within the High Weald National Landscape, will continue to suffer significant and increased adverse environmental effects. This area and that of Eridge Park is sensitive and predominantly rural in nature, comprising nationally protected landscapes of the very highest ecological importance and significance.

We are also concerned at the lack of consideration given to the ever-increasing Noise Contour Area and the effects this noise will have on residents, business and the wider landscape/environment particularly with an additional opportunity to address this fully not being taken by the applicant.

Furthermore, the Airport is forecast (based on its own published information), even without the additional runway, to achieve double digit aircraft movement growth over the next 25 years. There is scope for achieving efficient growth by looking at ways of moderating the peaks and troughs of demand - for example, by staggering school holiday periods, and through maximising operational efficiency and use of future technology.

The proposals reinforce a continued London / South-East centric approach, that would miss the opportunity to act in the best interests of the country as a whole, by failing to make best use of significant spare runway capacity at airports such as Birmingham, which within the next decade will be linked into the new High Speed rail link (HS2).

Virtually unfettered growth at Gatwick to the tune of 36 per cent in the next 25 years is completely at odds with the Government's legal commitments on net-zero and climate change.

For these reasons, we continue to object in the strongest possible terms to the Northern Runway proposals at a strategic level, and with regard to the specific impacts on the local areas including the designated SPA / SAC's, SSSI's and SNCI's.

LICHEN SURVEY OF ERIDGE PARK SSSI

EAST SUSSEX

2023

Draft 2.0
April 2023
[redacted]
For Natural England

[redacted]
Botanical Survey
and
Assessment

Email: [redacted]@dircon.co.uk

3.1.3 Pollution Impact at Eridge Park

Observations on the pollution impact on the lichen assemblages within the SSSI were made during the survey, with trunk assemblages generally indicating past impacts and the twig assemblage giving the current impacts. This reflects the fast turnover of twig species as opposed to the greater inertial of stable trunk communities.

Acidifying pollution: the area was subject to significant acidification from sulphur dioxide pollution in the mid to late 20th century. Given Eridge Park's position only 50km from the centre of London, it is remarkable, not that it was damaged, but so much survived. The south facing ravines in Old Park were clearly very sheltered from the prevailing sources of pollution. Even here, however, residual acidification impacts are evident. Other more exposed areas were very badly impacted, especially on the poorly buffered hard Beech bark. Many old Beeches appear to have been effectively sterilised of lichens higher up on the slope. Sulphur dioxide pollution has massively declined and evidence of declining bark acidly and a recovery of sensitive lichens was seen in 2023. This however was not as marked as seen in some other places, for example the rapidly colonising base demanding lichen *Normandina pulchella* is still quite rare. Potentially deposition of nitrogen oxides, mainly now from transport sources, presumably including planes landing at Gatwick, is slowing down recovery from the past acidification, although the level of acidification is far lower than at the height of the sulphur dioxide pollution. Slowly growing veteran Oaks that retain acidified bark for decades will long show residual impacts, but these should fade as the bark is slowly shed. Beech may take even longer.

Ammonia pollution: although acidifying pollution has massively declined, high levels of ammonia, mainly from agricultural sources are now a major impact on lichen assemblages in the lowlands (Wolseley et al, 2006 & Bosanquet, 2019). This impacts lichens mainly by raising the bark pH rather than any fertilising effect (Frahm, 2013). In its 2017 and 2018 three year average modelling, the Apis website (https://www.apis.ac.uk) showed the background for the Eridge Park area as just about or below the critical level for epiphytic lichens of 1.0 µg m^3, which matched the field evidence of the lichen twig assemblages. The latest modelling for the 2019 three year average no longer matches the lichen assemblage and shows the whole area as 1.5 µg m^3, well in exceedance of critical level for epiphytic lichens of 1.0 µg m^3. This problem of a massive jump in the modelled ammonia has been noted in other areas previously shown as relative clean in southern England and Wales. As the modelling no longer shows any correlation to the lichen assemblages at several sites looked at by the author recently, it appears no longer to be practically usable and the earlier three year average figures should be used.

The twig assemblages do not suggest any area is heavily polluted by ammonia. On Oak twigs on the most exposed trees high in New Park, *Xanthoria parietina*, highly indicative of ammonia pollution is rare on these twigs but is present. Nowhere is it dominant on Oak twigs as would be expected at high levels of ammonia pollution. Moderately ammonia sensitive species are still present on the most exposed trees, especially *Evernia prunastri*. However, the more sensitive species such as *Parmelia saxatilis* s. lat., *Hypogymnia physodes* and *Platismatia glauca* are present in the more sheltered areas. There is no evidence of ammonia pollution impact on the trunks, with *Pachnolepia pruinata* cover not excessive on dry bark and *Diploicia canescens* and *Amandinea punctata* sparce. This suggests that the most exposed areas of the park are close to exceedance in ammonia, due to exposure to background levels, but that the more sheltered areas are not, as would be expected in an extensive are of non-intensively used woodland and parkland.

4.3.5 Air Pollution

The lichen assemblages suggest that ammonia pollution, which will mainly be from intensive agriculture, is low deep in the sheltered areas of the park, but may be close to critical level for epiphytic lichens in more exposed areas. This is assumed to be mainly originating from off site, so mitigation will mainly depend on national policy to reduce the levels. This has been very successful in the past for sulphur dioxide based pollution but ammonia, with its mainly agricultural origins, is proving rather resistant to successful reductions via national policy as yet (Plantlife, 2017).

The impact of past acidification by Sulphur dioxide pollution has massively declined since the late 20th century and evidence of declining bark acidly and a recovery of sensitive lichens was seen in 2023. This however was not as marked as seen in some other lichen rich woods in southern England. Potentially deposition of nitrogen oxides, mainly now from transport sources, presumably including planes landing at Gatwick, is slowing down recovery from the past acidification, although the level of acidification is far lower than at the height of the sulphur dioxide pollution. Again,

reducing this is a policy issue which needs to be dealt with at a regional and national level.