

**From:** [Christina Coleman](#)  
**To:** [transportinfrastructure@dft.gov.uk](mailto:transportinfrastructure@dft.gov.uk); [Gatwick Airport](#)  
**Subject:** Interested Party response to Gatwick Airport Expansion  
**Date:** 08 June 2025 21:48:17

---

Interested Party Reference: **20043225**  
8th June 2025

Cllr. Christina Coleman  
Wealden District Council



[transportinfrastructure@dft.gov.uk](mailto:transportinfrastructure@dft.gov.uk)  
[gatwickairport@planninginspectorate.gov.uk](mailto:gatwickairport@planninginspectorate.gov.uk)

## Objection to Gatwick Airport Expansion Application

Dear Case Team,

1. The Examining Authorities have given careful consideration to the application and recommended refusal in their submission of the 27th November 2024. Their expertise and authority should be upheld by the SoS.

### Procedural Concerns

2. GAL has circumvented proper process by introducing a third scheme, outside of the examination time frame and via a letter. This inadequate approach for such a significant decision demands either outright refusal or a full examination allowing proper scrutiny of new evidence.
3. GAL's letter of 24 April 2025 dismisses expert concerns about noise pollution and surface transport as "misunderstandings, exaggeration, assumption and incorrect application of evidence." This subjectivity around uncertain future outcomes reinforces why the precautionary principle should apply and expert opinion should be upheld.

### Unique Environmental Concerns

4. On p.3 of letter of 24 April 2025, GAL claims nothing is "specific to London Gatwick that would justify a different approach to other airports." This contradicts fundamental planning principles that require each application to be judged on its unique merits and constraints.
5. There are constraints that are highly specific to this particular location. The noise impacts are significantly greater in an area of protected landscapes and habitats where tranquility is highly valued, than they are in an urban setting where background noise levels are higher. Two thirds of Wealden is a protected landscape, whether that be: the South Downs National Park; the Ashdown Forest, Special Area of Conservation (SAC) and Special Protection Area (SPA); the High Weald National Landscape or one of the 41 Conservation areas. Gatwick is in a uniquely different position from other airports and poses significantly higher environmental harms.

6. In July 2023, Wealden District Council wrote to express concerns over detrimental impact to the High Weald Area of Outstanding Natural Beauty (as it was then called) and the Ashdown Forest SAC and SPA. Since that time, the requirement to safeguard these protected landscapes has increased (as noted on page 6 of GAL's letter). The revised National Planning Policy Framework (NPPF) seeks to further the purpose of national landscapes through a strengthened duty on relevant authorities to "seek to further" the statutory purposes of Protected Landscapes. This duty replaces the previous requirement to "have regard to" these purposes, creating a more proactive and outcome-focused approach, which Gatwick's expansion would undermine.

### **Critical Threat to the Ashdown Forest.**

7. It is worth noting that the Ashdown Forest SAC, SPA and SSSI status is largely due to its unique habitat that supports highly endangered bird species such as the dartford warbler and nightjar. Gatwick Airport expansion specifically threatens the Ashdown Forest due to increased nitrogen deposition from air pollution, which alters the ecology of the rare habitat and from bird kills. The FAA estimates that bird strikes cost the global aviation industry over \$1.2 billion annually, yet the full impact on protected species remains unquantified. Bird strike will impact red list species such as house martins and swifts, as well as protected species such as owls and skylarks. Given that the Ashdown Forest has its protected status specifically because of its bird population, this presents an existential threat.
8. The health, tranquility and biodiversity of the Ashdown Forest and High Weald National Landscape contributes significantly to our district's local economy. Degrading the Ashdown Forest to the point of losing international protections poses unquantified risks to our district's economy, which relies significantly on these protected landscapes.

### **Transport Infrastructure Failure**

9. While GAL proposes a series of mitigations to alleviate "the impacts of road traffic at the airport" (p.4, letter of 24th April 2024) it does little to mitigate the impacts further afield. Wealden District Council expressed concerns about the ability of existing proposed public transport/sustainable transport measures to adequately provide for shift work at the airport" and in particular to transition people out of their cars. "The north of the district does not contain any railway station that directly travels to Gatwick" yet there is a short distance between settlements in the North - such as Forest Row - to Gatwick airport by car (under 30 minutes). This means that the north is likely to see a significantly increased level of road traffic. The north is also the most ecologically fragile.
10. P.4 refers to the investment that Gatwick has made into the railway station. While this is commendable, it does nothing increase the capacity of the train line. With passenger numbers set to near double and no prospect of additional capacity on the rail network, with trains often being full during peak capacity, it can only lead to unsustainable increased road traffic. Gatwick airport shirks responsibility for these economic externalities by stating that they are "not entirely within GALs control" and claim it is "not fair or reasonable" to expect GAL to take full responsibility for their impacts. Why is it fair and reasonable to expect this already over-heated area of the South East to endure the negative economic impacts and decreased quality of life that results from significantly increased levels of congestion?

### **Sewage and Wastewater**

11. GAL states that it is "pleased to report it has reached an agreement with Thames Water." Unfortunately, this agreement is neither reliable nor credible. At this time there is no commercial

or public confidence in Thames Water. The company has a troubled history with sewage management around Gatwick Airport and faces severe financial uncertainty. The most significant incident near Gatwick occurred when Thames Water pumped "millions of litres" of undiluted sewage into rivers, killing more than 1,400 fish, turning the water black. The company pleaded guilty to four charges and was fined £3.3 million in July 2023 for this environmental disaster that affected the Gatwick Stream and River Mole. Thames Water's broader sewage problems are extensive. The company pumped sewage into the Greater London area of the River Thames for 1,914 hours in 2024, according to River Action UK, demonstrating systemic operational failures beyond the Gatwick area. Regarding financial stability, Thames Water is in crisis. The company is preparing for possible special administration following court proceedings, which would essentially mean temporary or permanent government control. Thames Water's ability to deliver on future commitments is questionable when it cannot adequately fund current operations or prevent repeated sewage spills. The agreement that Gatwick has reached with Thames Water does not represent a guarantee against future spills.

### **Economic Benefits: For Whom?**

12. Page 8 of the letter refers to the inadequate weight placed on "the very substantial economic benefits, the scale of which cannot reasonably be described as moderate." The crucial question is who benefits? It is easy to see the financial benefit for the owners and shareholders of Gatwick Airport, majority owned by the French Group Vinci and a consortium of investors, Global Infrastructure Partners (GIP) from Abu Dhabi, Australia, USA and South Korea as well as the airport's chief executive, Stewart Wingate who stands to gain a £5 million bonus if the deal goes through. Economic losers include local communities suffering sleep deprivation, ill health, degraded ecosystems, increased traffic, and negative economic impacts. The University of Oxford and Green Finance Institute estimate environmental damage could reduce UK GDP by 12%. Logically, this will be higher in areas more dependent on thriving ecosystems. The lack of democratic input in this decision making process is reflective of the fact that vested interests seek to gain while the majority of people will suffer the costs.

### **Climate and Technology Concerns**

13. Para 3, page 2 of GAL's letter (24.04.2025) states that "the actual fleet transition since 2019" is not as fast as the ExA had anticipated. This is concerning and has wider implications for the expansion, making the case to refuse the application stronger than the ExA originally thought. Despite the rhetoric around "sustainable aviation fuels" the reliance on the government's jet zero aspirations is premature, insufficient and irresponsible. The aviation sector remains one of the fastest growing contributors to greenhouse gas emissions. It would be an act of blind optimism, or simply wilful blindness, to agree to the expansion in the hope that better technologies will one day emerge. A more responsible government would ensure that the necessary technologies are tried, tested, workable and scalable before expansion is permitted.
14. I welcome the fact that the SoS has taken carbon budgets into account, but GAL's dismissive response to these concerns is problematic. Not least because the UK government's carbon budget delivery plans for the sixth carbon budget have twice been found to be unlawful by the High Court, in 2022 and 2024, for failing to meet the legal requirements of the Climate Change Act 2008. The plans were found to be inadequate, lacking detail, and failing legal obligations. Courts specifically criticised the government's reliance on unproven technologies and vague proposals. The same charges could be levelled at Gatwick Airport's approach to climate commitments.

### **Full Climate Impacts**

15. Carbon emissions are only the tip of the iceberg when accounting for aviation's climate impacts. Jet engines emit CO<sub>2</sub>, nitrous oxide, contrails, soot, and black carbon. Together, these non-CO<sub>2</sub> emissions have twice the global warming impact of the CO<sub>2</sub> alone. This is partly why it is extremely difficult to reduce the emissions of the aviation sector. Flying less is the only way to reduce emissions in this critical decade to 2030. Most aviation emissions aren't counted in national carbon accounts (only domestic flights are included), creating perverse incentives. However, our shared atmosphere "keeps the score," and legal precedent exists for accounting downstream emissions.

16. The judgement in the landmark Supreme Court Ruling on the 20th June 2024, in the Sarah Finch versus Surrey County Council, is relevant here. The finding was that there is a certain causal relationship between the approval of drilling of hydrocarbons and the greenhouse gas emissions that would result from the burning of those hydrocarbons. It logically follows that there is a certain causal relationship between the approval of airport expansion and the emissions caused by the additional flights, and the additional surface transport generated, as a direct result of that expansion. Indeed, increased passenger volumes and a greater proportion of long haul flights is the primary purpose of the expansion; in order to facilitate "long haul connectivity" (p.2 para 4 of GAL letter). Such a function will require larger, more fuel intensive and louder planes. The landmark Supreme Court ruling of Finch vs Surrey County Council found that:

\* There had been an overly narrow interpretation of the Environmental Impact Assessment regime.

\* The climate impacts resulting from the end use consumption must be considered

\* The exclusion of end-use or down-stream emissions from the Environmental Impact Assessment were inconsistent and legally flawed (regardless of where these emissions actually took place - as the atmosphere knows no borders).

All of these principles apply equally to Gatwick expansion.

## **Conclusion**

The Examining Authorities' recommendation for refusal should be upheld. GAL's procedural circumvention, dismissal of expert concerns, and failure to address unique environmental constraints, transport inadequacies, and climate impacts make this application fundamentally flawed. The precautionary principle demands refusal unless full examination of new evidence occurs.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please email us. Any views expressed are not necessarily the views of Wealden District Council unless stated. Wealden District Council is committed to ensuring that your privacy is protected and will only use and store your personal data in line with the General Data Protection Regulation 2016 and the Data Protection Act 2018. We collect and use your personal data in order to provide services you have requested from us or to carry out our legal obligations to you. We will not disclose your personal data to any third parties, unless we need to do so to provide a service to you or we are legally required to do so. We may share your personal data with other Council departments in order to provide the service you have requested and to ensure that the information we hold about you is accurate and up to date. Our Privacy Policy sets out how we collect, use and securely hold your data. If you want more information on how a particular Council service uses your personal data, please view the full [Policy and Privacy Notices on our website](#)

