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To: [Gatwick Airport](#)
Subject: Gatwick Airport - Interested Party number 20041424
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Dear Secretary of State for Transport

I respond concerning the Gatwick Airport New Runway as an interested party - 20041424

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.

No new runway – Gatwick Airport has not provided a strong enough case for why there is a 'need' for a new runway, so the SoS should take the Planning Inspectorate's recommendation not to support a new runway.

Timing – Gatwick calls for an earlier approval of a new runway at Gatwick, before 27th October. This is unacceptable as due process must be adhered to.

Noise – Noise must be fully re-examined in view of the applicant detailing that the robust investigations by the Planning Inspectorate did not understand the applicant's submissions. Throughout the hearings, CAGNE has detailed the inconsistencies of the applicant's submissions. The applicant is now proposing new noise criteria, with a consultation of interested parties as the alternative. This would not be legally binding and seriously questions the merit of the planning process, as it will not have been independently examined with findings produced for all to examine before any planning permission is given for a new runway.

Any noise restrictions should be continuous throughout the year for arrivals and departures, not just for the summer months. You may note that the recent CAA contour report shows how Gatwick is already impacted far greater number of people than in previous year

https://www.gatwickairport.com/on/demandware.static/-/Sites-Gatwick-Library/default/dw03fe5b8c/images/Corporate-PDFs/Noise-Reports/LGW_2024_summer_contours_report_FINAL.pdf

Gatwick consultations tend to favour the airport over residents, and a simple airport consultation post 27th October does not override PINS' rigorous examinations of the poor data responses provided by the airport during the hearings.

The applicant seems to wish to dismiss tranquillity as 'lack of ambient noise', using a flawed Noise Management Board report produced by the Gatwick noise expert. The report was very narrow in its investigation, so was not accepted by residents as factual during the NMB.

Ground and plant noise - CAGNE do not believe that ground and plant noise has been fully examined, so this must be re-examined, along with noise from aircraft in flight. It is not sufficient to acknowledge the noise without robust criteria of how it will be addressed, allowing for restrictions should the noise be an issue – there seems to be no baseline for the noise created.

Compensation – CAGNE do not accept the applicant's argument on a reduction of mitigation and an 'agreement on case by case' basis, as this offers residents no assurances of what they will receive or what the applicant feels obliged to provide. Residents should be assured of a robust DCO agreement that is legally binding, that can be appealed against should a resident feel inadequately compensated by the applicant for increase in noise and devaluation of home.

We do not understand how the economic projection can be reached without the modernisation of airspace, so this must be included in the SoS decision. The compensation being offered by the applicant does not account for changes to flight paths, and no compensation is being offered for greater concentration of flights, or new flight paths over new communities.

Surface Transport – The lack of surface access to the airport has always been Gatwick's Achilles heel, as detailed in the Heathrow vs Gatwick Airport Commission report submissions for a new SE runway in 2014.

The proposed increase in the drop-off fee to £7 simply pushes the congestion back to roads and stations that have not had the £200m investment of taxpayer's money that the Gatwick station has had. It also firmly places the bill with local authorities of a decline in air quality.

Improvements to the roads and public transport should be paid for by the applicant, not the taxpayer. Legal agreements must be in place now before any new runway is approved. The 54% of airport users travelling by public transport must be legally binding, as proposed by SoS in restrictions of 27th February. With congested residential roads comes a decline in air quality, adding to the cost to residents, the NHS, and the public purse.

We note that the highways will be expected by the applicant to carry up to 350,000 tonnes of cargo by 2047, with insignificant investment.

Insufficient Funding - The offer of £10m for roads is inadequate, as it costs about £1m for one mile of road to be resurfaced. The Brighton Railway Line is receiving a £900m investment by Network Rail but, if Gatwick are serious about placing over 32m extra passengers on the line, they should be contributing far more than £10m.

As detailed throughout the PINS examination, the applicant is relying on third parties to provide the surface access to the airport, yet they are not now obliged to meet the cost, or the restriction offered by your department, which would seem a reasonable restriction if they truly believed the sustainable surface transport plans that the applicant submitted.

Areas of Outstanding Natural Beauty – The offer of £320,000 by the applicant is a dereliction of duty as it does not improve ANOBs, as some areas of them are expected to withstand a 20% increase in aircraft movements over heritage sites and rural areas designated as AONB.

An £80,000 donation for the South Downs National Park Dark Skies Reserve is simply unacceptable, due to Gatwick contributing to a major loss of dark skies, with light pollution that can be seen for miles as well as overhead. Sleep deprivation is suffered by residents, especially in the summer months (peak time for Gatwick) with 11,200 flights between 11.30pm and 6am.

Night flights – The applicant's offer of an agreement not to use the northern runway at night does not stop this new runway from being used during the 'shoulder' periods of 10-11.30pm and 6am onwards, when sleep is being sought (timing known to carry health risks). It must be noted that the main runway will have to accommodate all arrivals from departures on two runways, which includes at night. We therefore ask for a night ban for both runways.

Climate Change – The applicant argues that this has been overcounted, as the carbon emissions should be counted only from the 'project'. CAGNE argue that the emissions from both runways must be accounted for, as with the construction and road transport. All planes that depart from the new runway will arrive on the main runway.

The applicant does not account for incineration of waste emissions, or for non-CO2 gases.

I continue to call for a carbon cap to restrict growth if emissions are not reduced.

Top 10 polluting airlines in Europe

<https://www.euronews.com/green/2025/05/01/europes-top-10-most-polluting-airlines-revealed-in-new-report-calling-for-carbon-market-re>

And aviation industry failing dramatically on climate

<https://www.theguardian.com/environment/2025/may/06/aviation-industry-failing-dramatically-on-climate-insiders-say>

Thames Water – CAGNE supported Thames Water with a staggered growth due to the lack of capacity in neighbouring sewage treatment plants. Gatwick initially agreed to an onsite waste treatment plant. We see no reference to this being legally binding if Thames Water cannot meet Gatwick's requirements with increases in passengers, workers, hotels and offices. There are already issues with sewage flowing into homes and on residential roads (there is a serious lack of capacity at Thames Water sewage treatment plants). The response by the applicant of reaching 'common ground' between the two parties does not provide any guarantees for future capacity. If Thames Water is unable to provide capacity, Gatwick must have growth restricted. This must be enforced by the SoS as part of the DCO if the Government is serious about preventing sewage entering the river system in the Gatwick area. At present there are no legal grounds to guarantee that Gatwick does not add to the sewage being spilled with heavy rainfall with a new runway.

Thank you

Sally Pavey