

# GACC NEWSLETTER

Number 137 September 2023

Dear Members

**\*\*\* Gatwick 2<sup>nd</sup> Runway - DCO application live – NOW you can register to have your say \*\*\***

Gatwick have submitted (July 3rd) a planning application for a Development Consent Order (DCO) to expand the airport to the government's planning inspectorate. The proposal replaces its standby runway with a full second runway. This will increase Gatwick's capacity to be as busy in the future as Heathrow is today.

The submission by Gatwick consists of some 300 plus documents and we are now filtering these to examine which claims made by Gatwick need to be challenged.

Following the acceptance of the DCO as valid by the Planning Inspectorate in early August the next stage of the planning process is the opening of registration for people and organisations to have their say on the application. The registration process is **open from 5<sup>th</sup> September to the 29<sup>th</sup> October**. Far longer than the typical 28 days, highlighting the importance of this application. You must include comments with your registration. Your comments must be about what you consider to be the main issues and impacts. You can also include anything that may affect your day-to-day life.

You will be able to submit further comments during the Examination of the application once you have registered. You must submit your registration before 23:59 on 29 October 2023.

The link to the registration page is [here](#)

We will publishing a briefing sheet on how to respond to the DCO by the end of this month, including guidance on how best to register to take part in the consultation.

We continue to liaise with the relevant local authorities and with national organisations including the Aviation Environment Federation (AEF) and the New Economic Foundation (NEF) as well as our in house experts to ensure we put forward a robust challenge to Gatwick's proposals.

**Gatwick Airport 2<sup>nd</sup> Runway – Making our Voice Heard**



On Monday 7<sup>th</sup> August we co-organised at very short notice a rally at Riverside Gardens in Horley (a green space that will be impacted by the development) to coincide with the government deeming that Gatwick Airport's consultation on its runway plans were acceptable. This was despite all the host authorities (the 10 local authorities who are officially consulted), all ten MP's in constituencies around the airport and ourselves making robust objections to the adequacy of the consultations. (See the objections [here](#) and [here](#)) This was well attended by both our members, local residents and various local community and campaign groups. We received substantial press coverage throughout London & the South East and the Gatwick's Big Enough message was well publicised ! Some more pictures of the event are [here](#).

### **Noise Management Board**

GACC and most other community groups withdrew from active participation in Gatwick's Noise Management Board (NMB) at the beginning of this year because the board had ceased to be effective and community group views were routinely disregarded. We called for the board to be disbanded and new arrangements put in place, but Gatwick rejected this. As a result, the current board will instead run until December 2023. We have proposed mechanisms for a review of the NMB, but these have also been rejected. We are therefore concerned that any future NMB will also be ineffective. However, we intend to participate robustly in whatever alternative review process Gatwick puts in place. We will update members on this in due course.

### **Noise Action Plan**

Gatwick is required to submit its proposed 2024-29 Noise Action Plan (NAP) to Defra by 1 September. Outside of the night period, the NAP is the only element of the noise

management regime at Gatwick that has a degree of statutory backing. We have consistently argued that past NAPs have failed to meet legal requirements and government guidance, and have called for them to be rejected by government.

A draft of the 2024-29 plan was provided to on 21 August and drafts of some sections a little earlier. We've submitted extensive comments. In summary, in our view:

- the public has not been given early and effective opportunities to participate in the preparation and review of the plan, as required by law;
- the basis on which the plan has been prepared - that Gatwick should be permitted to grow as much and as fast as it wants and only required to seek to "manage noise impacts" - is neither acceptable nor policy compliant.
- the basis on which the noise reduction estimates in the plan have not prepared is not clear, so it is not possible to judge whether they meet government policy or Defra's guidance
- the plan as a whole does not meet Defra's tests that NAPs must be challenging, quantified where reasonably practicable, subject to specific timescales and use a range of appropriate metrics.

The plan also does not explain what action will be taken if the measures in it are not met or appear likely not to be met. We will review the plan submitted to Defra in September and take further action as necessary.

### **Airspace modernisation update (FASI-S)**

The airspace modernisation programme is separate from Gatwick's expansion plans but will also have serious consequences for communities under flight paths because it will increase capacity and concentrate flight paths. Depending on the flight paths chosen, it is likely that some communities will suffer from more intensive aircraft noise. Others may experience intensive aircraft noise for the first time.

Gatwick will shortly submit the conclusions from its initial options appraisal to the Civil Aviation Authority, which regulates the airspace change process. We have reviewed the draft conclusions and raised a range of serious concerns with the airport. These include that:

- Gatwick has not developed or assessed options that deliver an acceptable degree of arrivals dispersal. As a result, most of the options GAL proposes to take forward would impose substantially greater noise levels on some communities than they have experienced historically.
- It has not assessed the increase in noise intensity each option would expose impacted communities to, or the effects (health, mental health, quality of life, reduction in asset values etc) of options.
- It's choice of shortlisted options appears to have been driven principally by the desire to increase capacity, resulting in the rejection of some options that might improve noise outcomes.
- And it has not demonstrated that its proposals will satisfy government policy that the industry must "continue to reduce and mitigate noise as airport capacity grows", taking account of all growth that FASI(S) will facilitate.

As a result, we have told the airport that we do not believe it has carried out a sufficiently thorough initial options analysis, that it is not in a position to submit its analysis to the CAA and that we would ask the CAA to reject the analysis if it is submitted.

## Noise Management Board

In our last newsletter we mentioned that we had written to Gatwick's CEO in November, 2022 with our concerns and our suggestion that the NMB be reviewed immediately. We finally received a response in late February 2023 that indicated Gatwick were not going to change the timetable in place for the NMB and the review would take place as scheduled later in 2023. We intend to participate robustly in that process.

## Noise envelopes at Gatwick

One of the key legal requirements for Gatwick's expansion proposals is that it must propose a "noise envelope". The noise envelope is intended to give certainty on the amount of noise the airport will be able to generate if expansion is approved. It must meet government noise policies and the requirements of the Airports National Policy Statement. Gatwick published initial noise envelope proposals in 2021 and carried out some limited engagement on them in 2022.

Although only 9% of consultation responses supported Gatwick's initial noise envelope proposals, the airport's final proposals, published with its DCO application earlier in August, are virtually identical. If approved, they would allow noise to increase substantially. We will be assessing the proposals and challenging them robustly through the planning process.

## Gatwick Operations

Gatwick have just published their Hal year figures for 2023 which show aircraft movements at 86% of the 2019 peak and half year profits at just under £80.00mil.

## Funding

We are not carrying out a fund raising programme at present. Legal representation isn't required at the hearing stage of the application. The need for fund raising will be after the DCO application decision is known when we may need to call for a judicial review of that decision. We'd rather not jeopardise what could be a call for significant funding support (circa £75-100k) in eighteen months time.

That said we of course are always grateful for financial support. Our campaign does incur costs and our reserves will always need 'topping up'. If you would like to donate to GACC please contact via the email address below.

## Joining GACC: please spread the word

Please encourage your friends, family and neighbours to join GACC and help protect the interests of communities around the airport and under flight paths. Information on how to join is on our website [here](#).