

Gatwick Airport Northern Runway Project

Surrey Climate Commission Response to Consultation

Responses to Questions in the Consultation Questionnaire

1. Northern Runway proposals: overall

Question: We are proposing to bring the existing Northern Runway into routine use alongside our Main Runway. Enabling dual runway operations and supporting increased passenger numbers at Gatwick would involve other changes, including to airport infrastructure and some surrounding roads. We have included proposals to mitigate the effects of the Northern Runway Project and maximise the benefits, especially to local economic growth and new jobs.

To what extent do you support or oppose our proposals to bring the existing Northern Runway into routine use?

Answer: Strongly oppose

Please explain your views

Surrey Climate Commission strongly opposes the Northern Runway Proposals at Gatwick.

Gatwick Airport Limited (GAL) has failed to demonstrate that there is a need for additional airport capacity or that the project would have net employment or economic benefits. Gatwick's case for its Northern Runway Proposals (hereafter referred to as 'the project') does not comply with government aviation policy. The Airports National Policy Statement requires airports (other than Heathrow) that are seeking to expand to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow. Gatwick has not done so. This is a fundamental omission: because it fails to set out a needs case that is consistent with government policy the consultation is not fit for purpose.

The Gatwick proposals are at odds with the recommendations of the Committee on Climate Change (CCC), which advises the UK government on emissions targets and reports to Parliament on progress in reducing greenhouse gas emissions. In their 2021 report to Parliament, the CCC notes that "Managing aviation demand is a critical part of achieving the Net Zero target, future needs must be considered alongside appropriate price incentives" and "There should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory." Gatwick airport has not demonstrated that it complies with the CCC requirement.

The project would lead to an increase in the airport's CO₂ emissions by nearly 50%. This increase in emissions will limit the UK's ability to meet its carbon reduction targets and is therefore inconsistent with the government's emissions target. The non-CO₂ consequences of the project have not been adequately assessed or quantified.

The project would lead to more noise, more road and rail congestion and worse air quality. The project, as currently proposed, includes inadequate sustainable surface transport improvements and would lead to a large increase in unsustainable car traffic. These impacts will apply across

the wider region and will have a significant impact on the quality of life of communities in the vicinity of the airport and under flight paths.

The Environment Act 2021 requires developments to reverse the decline in biodiversity by 2030. The project, with an increase in flights, additional land-take and wider impacts, will have a negative impact on biodiversity.

Gatwick's analysis of the noise impacts of the project are inconsistent with Civil Aviation Authority guidance and government policy. Enforcement proposals are inadequate. Stakeholder engagement on the proposals do not meet CAA requirements.

2. Economic benefits: jobs and skills

Question: We are proposing a number of measures designed to maximise employment and skills benefits resulting from the Northern Runway Project. Do you think we could do anything more - or differently - to maximise local and regional employment and skills benefits?

Response

Analysis carried out by GAL's consultants, Oxera, indicates that the project is unlikely to result in a net increase in jobs at the national level. Jobs that might be created in the local region would very largely be displaced from other parts of the economy and other regions. Gatwick's local employment estimates are not based on recent evidence and do not represent the latest range of uncertainty in future trends.

3. Economic benefits: business and the economy

Question: We are proposing a number of measures designed to maximise benefits to business and the economy resulting from the Northern Runway Project. Do you think we could do anything more - or differently - to maximise benefits to business and the economy?

Response

GAL's assessment of the economic benefits of the project are founded on a substantial increase in business passengers using the airport. However, the forecasts assume that the Covid-19 pandemic will not have a long-term impact on passenger demand at Gatwick. This is at odds with experience from previous economic or wider shocks and market expectations. GAL should carry out and report a thorough review of the basis of their passenger demand forecasts and test other scenarios in which the pandemic has a longer-lasting impact on air passenger demand than currently assumed by GAL. Alternative scenarios should also include expansion at other airports, especially Heathrow, as this is likely to depress demand at Gatwick.

Gatwick has not adequately assessed the adverse economic impacts the project would be likely to generate by increasing outbound tourism, including negative impacts for the UK's tourism economy and balance of trade.

Gatwick's estimate of the monetised value of the greenhouse gas emissions resulting from the project is incorrect because it uses out-of-date input values.

Correction of the above assumptions, omissions and errors is likely to have a very significant effect on the overall benefit-cost ratio of the proposed scheme.

4. Airport supporting facilities

Question: We would need to change or relocate some facilities to accommodate the proposed alterations to the existing Northern Runway. Some new, additional facilities would also be needed. These changes would be largely within the current airport boundary. The current Central Area Recycling Enclosure (CARE) facilities would be relocated. We are considering two potential locations for the CARE.

1. Option 1: to the north

of the cargo hall (north east of the proposed Pier 7) Do you think this location is:

Appropriate *Inappropriate* *Don't know*

2. Option 2: to the north west of the proposed Pier 7

Do you think this location is:

Appropriate *Inappropriate* *Don't know*

Please explain your views.

Response

No comment.

5. Landscape and ecology

Question: Our proposals include keeping green space wherever possible, protection of important environmental and community assets, improved landscaping, provision of public open space and footpaths, and the creation of new habitats. What are your views on our landscape and ecological proposals?

Response

The Environment Act 2021 requires developments to deliver a 10% net gain in biodiversity and reverse the decline in biodiversity by 2030. We expect the project, with an increase in flights, additional land-take and wider impacts, to have a negative impact on biodiversity. Developments should be working towards the aim of improving biodiversity.

The project will increase air pollution and noise impacts on sensitive habitats around the airport. Noise will have an impact on a lot of species, and birds in particular which need to communicate via sound (for example, prior to breeding). The increase in surface road transport which is expected to arise from the project will result in an increase in the number of animals killed or injured as a result of collisions with vehicles. Air pollution will also have an impact on wildlife, especially insects, and light pollution also has a negative impact on wildlife for example in relation to food gathering and bird migration. The project's negative contribution to greenhouse gases and climate change will have an impact on wildlife locally and further afield. Airports are permitted to kill or deter birds nearby to avoid bird strikes, and are therefore an intrusion on the natural environment for birds. Disruption to species connectivity corridors and the framework of wildlife would result from the construction of a new runway and taxiways. The changes to the roads feeding Gatwick would be damaging to biodiversity.

The project would require, according to GAL's own documents, major flood defences in diverting the River Mole and disposing of runway water. In addition, the land take required for bio fuels for future flights will also have negative impacts on deforestation, habitat loss, biodiversity and ecology that would be attributable to Gatwick's expansion plans.

All of these negative ecological impacts will increase with more activity at the airport, more flights and more surface transport. The project will have impacts which are contrary to the requirements of the Environment Act 2021 which aims, among other things, to halt the decline in wildlife by 2030. This is unacceptable.

6. Land use: overall

Question: We have aimed to develop the Northern Runway Project largely within the current footprint of the airport to minimise disruption to our neighbours and make efficient use of our land. Where we are planning to use land temporarily during construction, we are also proposing to restore it to its previous use once construction is complete. What are your views on our approach to land use?

Response

The current proposal does not limit the development to within Gatwick's perimeter. We do not support additional land-take either for construction purposes or long-term use. A public transport led surface transport strategy would negate the need for much of the footprint expansion proposed by the airport.

7. Getting to and from the airport: our approach

Question: Almost half of Gatwick's passengers already use sustainable modes of transport to get to the airport. To support the Northern Runway proposals, our transport strategy aims to continue increasing the overall share of passengers using public transport to get to and from the airport, deliver improvements to local highways and junctions, and encourage greater use of public transport and active modes by our staff. Do you think we could do things better, or differently, to ensure all passengers and staff have appropriate choices for accessing the airport?

Response

The main aims of GAL's strategy for surface access are contradictory. On the one hand, the airport says it will aim to increase the use of sustainable transport by passengers and staff. On the other hand the strategy proposes increases in highway capacity and car parking. Most of GAL's own transport investment proposals support the second of these aims, leading to an increase in highway and car parking capacity

The airport's proposals would result in a steady and substantial increase in car travel to and from the airport, with the number of passengers accessing the airport by car in 2047 around 40% higher than in 2019 (estimated from PIER Appendix 12.9.1, Table 7.6.5). To accommodate this increase the airport is proposing provision of 18,500 additional car parking spaces compared to current levels and substantial highway capacity enhancements. In addition increased vehicle movements are predicted for the proposed doubling of freight as well as the LGV and HGV movements to service increased day-to-day airport operations and maintenance.

Gatwick aims to increase the share of passengers using sustainable transport to 60% by 2030, increasing from 45% in 2018. Project modelling estimates that a mode share of 54% and 56% will be reached between 2029 and 2047. An even lower outcome is achieved for employees, with a 47% mode share achieved and the airport acknowledges that further measures are required.

These figures are not acceptable. Gatwick's commitment to achieving 60% sustainable transport by 2030 but would remain unfulfilled by 2047. There should be no increase in the number of passengers accessing the airport by road and no increase in highway trips, matching the commitment made by Heathrow in its expansion proposals.

Whilst Gatwick's proposals do not reach their own targets, even this level of passenger mode share change is surprising given the absence of credible plans to deliver a sustainable mode share and that most of the project's surface transport investment is targeted at improvements which support car travel. It is notable that highway demand levels are forecast to be high enough to cause localised congestion even with the proposed capacity enhancements.

The behavioural choices of passengers and airport workers are particularly uncertain following the Covid-19 pandemic, with many people still reluctant to use public transport, therefore the predictability of mode share is even more uncertain. One way of examining the implications of this is to test the modelling and assessment of the impacts of airport expansion in a range of scenarios, which should include a lower shift to public transport in line with recent trends.

In any case, the plausibility of the modelled mode share results should be confirmed and an explanation provided of the basis on which they were made. The airport must also demonstrate that it has taken full account of the likely increase in road traffic in South-East England over the next few decades arising from increased population and infrastructure.

In contrast to the substantial new investment proposed for the highway network and car travel, investment in public transport amounts to rather vague proposals to work with local bus operators to support a limited number of bus routes serving the airport and additional infrastructure to transport passengers from rail platforms into the airport. Gatwick is relying on already committed rail enhancements to support the additional passengers that will use the airport. The impact of other users of this rail corridor switching from road to rail transport but not travelling to and from the airport is not considered and should be.

Increased public transport provision for airport workers must reflect their shift working patterns and the locations of anticipated homes for airport workers. Gatwick notes that it has monitored the house building programmes of 17 council areas around the airport. This must be reflected in the proposals for sufficiently frequent and early/late-running bus services beyond the current fastway routes.

Gatwick must model the public transport investment required to service all the increased journeys to and from the airport by passengers and airport workers. Increased public transport provision (both up-front infrastructure and any on-going service costs) must be fully funded by the airport such that funding is not diverted from decarbonisation of existing transport to serve Gatwick's needs.

Gatwick says it will improve cycle parking, lockers and showers, and will provide some pedestrian and cycle improvements at several locations for staff who live near the airport. Whilst useful, these proposals will benefit only a small number of people and are unlikely to encourage a significant shift in the use of active travel modes.

Gatwick's proposals are inadequate and unacceptable. There should be no increase in the number of passengers accessing the airport by road and no increase in highway trips. This must be modelled and provided for in its proposals. Instead the airport should ensure provision of sufficient public transport capacity to accommodate all the additional demand and be required

progressively to reduce the absolute number of passengers, staff and other users using road transport as a condition of any expansion. A reduction trajectory should be set, monitored and enforced.

8. Road improvements

Question: We propose to significantly enhance the roundabouts at North Terminal and South Terminal (including by raising the M23 Spur/ Airport Way to take through-traffic above the existing roundabout) as well as improving Longbridge Roundabout by widening lanes to provide extra capacity. These improvements are necessary even with our strategy to promote the use of public transport and will cater for both airport and general traffic growth. What are your views on our proposals to improve local junctions to support airport growth as well as provide capacity for local traffic? Please specify the improvements to which your comments refer.

Response

As stated above we do not accept Gatwick's premise that the volume of unsustainable transport should be expanded to support the airport's planned growth. The proposals to increase highway and car park capacity will facilitate an increase in travel to and from the airport by cars and therefore cause additional harmful emissions. Gatwick should provide for all increases in its surface passenger transport through public and active transport alone. It is these modes, not increased road and car parking capacity, that must be invested in. This would remove the need for the works proposed on these roundabouts, remove the need for the additional parking proposed, and instead enable Gatwick to align its transport investments to the 'Avoid-Shift-Improve' decarbonisation plans of Surrey and of West Sussex.

9. Public and sustainable transport

Question: Our proposed target of 60% of journeys by sustainable transport to and from the airport by 2030 would be the highest for a major UK airport. We are proposing measures both to encourage public transport use and discourage unnecessary use of private cars by both passengers and staff. For our employees this includes promoting cycling and walking, car sharing and using zero emission vehicles where travelling by car is the only option. This describes our overall approach but there are specific things we propose in some areas, for example around Crawley and Horley. What are your views on how our proposals for increasing use of public and sustainable transport apply in your area? Please specify the proposals to which your comments refer and tell us if there are other things we could do that would be relevant to your journeys.

Response

GAL's proposed sustainable transport target is inadequate, misleading and unacceptable. The increase in passenger numbers the airport is seeking far outweighs the proposed increase in sustainable transport use. The airport's proposals would therefore result in a steady and substantial increase in car travel, with total passengers arriving and departing by car in 2047 around 40% higher than in 2019. The level of investment proposed in road transport and the insufficient proposed increase in public transport is inconsistent with the government's and local Councils' plans to decarbonise transport. These require net reduction in car travel and a shift to public and active travel instead. New public transport routes as well as increased travel on existing routes is required.

The airport's plans for increasing public transport mode share lack credibility and ambition. There should be no increase in the number of passengers accessing the airport by car and no

increase in highway trips. Instead the airport should be required to reduce the absolute number of passengers accessing the airport by car and the number of highway trips as a condition of any expansion. A reduction trajectory should be set, monitored and enforced. All necessary surface transport investments should be funded by the airport and required to be completed before the anticipated increase in passengers.

We comment below on the airport's proposals.

Road

As set out in our answers to questions 7 and 8 we see the main aims of Gatwick's strategy for surface access as contradictory. On the one hand, the airport says it will aim to increase the use of sustainable transport by passengers and staff. On the other hand the strategy proposes increases in highway capacity and car parking. This is because the increase in passenger numbers the airport is seeking far outweighs its sustainable transport proposals. The airport's proposals would result in a steady and substantial increase in car travel to and from the airport, with total car passengers in 2047 around 40% higher than in 2019. The proposals reflect this increase in road traffic movements to and from the airport through the provision of an additional 18,500 car parking spaces.

Gatwick has recently benefited from a re-alignment of the junction with the M23. While this improvement is needed, and may reduce delays, it does nothing to reduce commuting by road. The airport is not well connected to other economic centres by road, it should be noted that the M23 stops just south of Crawley and only goes north as far as the M25, Britain's most congested motorway.

Rail

Gatwick Airport station is on the Brighton to London main line. Gatwick's publicity makes much of its "excellent rail connections" but in practice the main connections are to Brighton and to London Victoria and are normally heavily used with high levels of crowding. Victoria has insufficient platform capacity, resulting in delays outside the station. Overcrowding on the Brighton-London line is severe during the rush hours. Gatwick says its rail modelling shows that no significant crowding is expected to result from its proposals, assuming delivery of improvements planned by Network Rail. Nevertheless, the project accounts for an increase of up to 4% of people standing on busy commuter services through south London and the impact will be exacerbated by the presence of luggage.

Rail crowding should be examined and reported as part of a series of sensitivity tests reflecting the range of demand scenarios that could emerge.

Low levels of project investment in sustainable travel

In contrast to the substantial new investment proposed for the highway network and car travel, proposed investment in public transport amounts to rather vague proposals to work with local bus operators to support a limited number of bus routes serving the airport and provision of additional infrastructure to transport passengers from rail platforms into the airport. Gatwick is relying on already committed rail enhancements to support the additional passengers that will use the airport. The impact of other users of this rail corridor switching from road to rail transport is not considered and should be.

These proposals must reflect the origins of anticipated journeys for both passengers and employees that currently travel to work in private cars. Sustainable travel options must be both more convenient and incentivised financially.

Increased congestion and need for sensitivity testing

In terms of impacts of the project and surface access proposals on highway network performance, Gatwick reports, pending further micro-simulation modelling, that even with the highway capacity improvements its surface access proposals will still cause local congestion which they refer to as 'manageable'. A range of sensitivity tests should be carried out which assume a lower than predicted shift to public transport and higher background growth in car traffic.

Gatwick's proposed expansion will further affect an area that is already suffering the effects of a mismatch between growth and the ability of the transport (and other) infrastructure to cope. It is also the case that there is a significant number of commuting journeys in and out of nearby Crawley leading to daily congestion as well as high levels of air pollution. This is also generating heavy traffic on local rural roads, including through the villages of Charlwood and Ifield. The area is becoming a focus for new development, leading to pressure for housing and urban sprawl, which will lead to further congestion on local transport routes.

Increase in cargo movements

The airport generates goods vehicle movements to distribute air cargo and goods for the operation of the airport and aircraft. In 2019 there was 150,000 tonnes of cargo, and this is expected to more than double by 2047 if airport expansion is approved. Gatwick notes that, based on current operations, cargo handlers typically expect 50 to 60 LGVs and HGVs per day.

Whilst a small proportion of overall traffic, HGVs have a more significant impact in terms of greenhouse gas emissions, air pollution and noise. The use of recommended transport routes to and from the cargo facility helps in separating this traffic however there is no enforcement of these routes and local communities suffer from excess HGV traffic.

The anticipated increase in traffic required to service the operations and maintenance of the airport should comply with an aim of a 'no net increase in road transport' envelope at the airport. This new public-transport led strategy must be modelled and sit at the heart of Gatwick's surface transport investment plans.

Air quality

Air pollution is noted to be the biggest public health threat in the UK. A 2016 study by the Royal College of Physicians put the number of premature deaths caused by air pollution annually at around 40,000 in the UK, primarily due to nitrogen dioxide (NO₂) and particulates (notably PM_{2.5}). Expanding Gatwick risks increasing emissions both from the additional flights and from the growth in road transport to the airport.

In September 2021 the World Health Organisation (WHO) strengthened its recommended limits to 10 micrograms (one-millionth of a gram) per cubic meter air, or µg/m³ annual mean for NO₂ and 5 µg/m³ annual mean for PM_{2.5} particles. There is also increasing evidence that ultra-fine particles have health impacts and that airports are a significant source of such particles.

Gatwick should be required to propose and enact plans that ensure its development complies with these latest WHO guidelines and adequately address ultra fine particle risks. The WHO notes that almost 80% of deaths related to PM_{2.5} could be avoided globally if current air pollution levels were reduced to those proposed in the updated guideline. Whilst Gatwick Airport note that they expect the development will reduce air pollution this is still not in line with current WHO guidelines and does not acknowledge how small particulates in tyres and brake pads persist even with the anticipated shift to electric vehicles.

All aspects of air pollution, including NO₂, particulates and ultra-fine particles must be modelled and reduced both within the airport boundary and in areas affected by flights and/or surface transport around the airport. Applying such a strategy to Gatwick's development plans would be consistent with ensuring that there is no increase in road traffic to and from the airport as noted above.

Accidents

Increases in traffic, whether from cars or goods vehicles, are likely to lead to an increase in accidents especially where traffic is concentrated in areas neighbouring the airport, including towns such as Horley, Horsham, Dorking, East Grinstead and Crawley. The reliance on smart motorways as the main strategic transport routes to the airport also increases accident risk.

10. Construction: managing impacts

Question: We are committed to being a good and responsible neighbour throughout the construction phase, giving consideration to both the local community and managing the environmental impacts of construction activity. While still to be finalised, we have included indicative details of anticipated construction methods, timings and phasing. These will be refined throughout the Environmental Impact Assessment process, but we will seek to incorporate best practices. Are there any particular measures or activities for managing construction impacts that you would like us to consider including in our proposals as construction details are defined?

Response

The additional noise, air pollution, climate and local transport impacts of the proposed construction works (including of the proposed changes to surface access) must be fully modelled and mitigated such that there is no short-term increase in air pollution, traffic congestion or noise at the airport.

11. Construction: transport

Question: We are proposing a package of measures to manage construction related traffic following best practice. This includes the routes vehicles take, the time they travel and measures to reduce the number of vehicles by re-using materials on site as much as possible. Our aim is to minimise the impacts of construction on local roads, keeping traffic on the strategic road network wherever possible. What are your views on our construction transport proposals?

Response

The additional noise, air pollution, climate and local transport impacts of the proposed construction works (including of the proposed changes to surface access) must be fully modelled and mitigated such that there is no short-term increase in air pollution, traffic congestion or noise at the airport.

12. Managing and mitigating effects: climate change and carbon

Question: We are proposing to mitigate increased greenhouse gas emissions associated with the Northern Runway Project with improvements in design and other measures. We are also developing a Carbon and Climate Change Action Plan that will demonstrate how we will continue to reduce carbon emissions from the airport and ensure Gatwick does not compromise the net zero UK carbon target. Do you have any comments on our approach or suggestions for specific measures to be incorporated into the Action Plan?

Response

We are disappointed that climate change mitigation is so far down the list of issues in the consultation questionnaire, and are concerned about the low level of priority that this implies. In its 2021 report, the Climate Change Committee notes that “the Department for Transport has not set out any plans for limiting growth in aviation demand.” It further notes that “Government must recognise that planning for an ever growing aviation sector is not consistent with the UK’s Net Zero target as part of its aviation decarbonisation consultation and strategy”. These statements from the government’s own climate change advisers highlight the importance of managing aviation demand. There is no evidence in the GAL consultation documentation that this has been done.

The project and the associated growth that Gatwick is proposing would increase CO₂ emissions attributable to the airport by nearly 50%, leading to a 5.5% share of total UK emissions in 2038. An increase in emissions of this (or any) scale would plainly have a material impact on the UK’s ability to meet its carbon reduction targets and is therefore inconsistent with the Airports National Policy Statement.

The airport has been unable to put forward credible plans for mitigating its projected emissions because there are currently no proven technologies for reducing commercial aviation CO₂ emissions at scale. It should also be noted that Sustainable Aviation Fuels are not yet an available or proven mitigation measure. The European Union Safety Agency has said “The use of sustainable aviation fuel is currently minimal and is likely to remain limited in the short term.” GAL’s expansion proposals are therefore inconsistent with the government’s policy requirement that the aviation sector must “make a significant and cost-effective contribution towards reducing global emissions” and with the Transport Decarbonisation Plan commitment to achieving net zero aviation by 2050.

Gatwick has also failed to assess or quantify the non-CO₂ climate impacts of its proposed growth. It must do so based on best available scientific evidence. Government guidance requires the indirect effects of aviation’s non-CO₂ emissions to be quantified using a multiplier of 1.9 times the CO₂ component. Gatwick must also monetise and report its emissions using latest government carbon values.

Any growth at Gatwick should be conditional on it achieving a progressive and material reduction in the total climate impacts attributable to the airport (inclusive of all surface transport and flight impacts) from a 2019 baseline. A reduction trajectory should be set, independently monitored and enforced.

13. Managing and mitigating effects: noise envelope

Question: We are proposing to introduce a ‘noise envelope’ to set limits on noise from future operations at Gatwick. The noise envelope would come into effect at the start of a dual runway

operation, giving residents certainty that the noise limits it prescribes would not be exceeded. This envelope would then be tightened in the future, giving residents further certainty that air noise levels would have to be lower than they were in 2019 for the full capacity of the Northern Runway Project to be realised.

Do you think the proposed noise envelope is: appropriate; inappropriate; don't know.

Answer: Inappropriate.

Please explain your views.

Response

Gatwick's noise envelope proposals are inconsistent with CAA guidance and unacceptable. They propose an inappropriate metric and limits, do not comply with government policy, and lack adequate enforcement arrangements. They have also been put forward without the stakeholder discussion required by the CAA, in contrast to the approach taken by other airports. For these reasons they are unacceptable and require substantial revision. A noise envelope development group, including all stakeholders groups, should be set up to develop alternative proposals.

In addition to the noise measures proposed in the Preliminary Environmental Information Report and agreement on a noise envelope, any expansion at Gatwick should be conditional on a ban on all night flights for a full eight-hour period every night.

14. Managing and mitigating effects: noise mitigation

Question: In addition to the Noise Envelope, we are proposing other measures to mitigate the noise effects associated with the Northern Runway Project, including an enhanced Noise Insulation Scheme, the noise envelope, a new noise barrier at the western end of the Northern Runway, and noise barriers to support changes to the highway network. What are your views on our approach to noise mitigation? Please specify the measures to which your comments refer.

Response

The noise mitigation measures Gatwick has proposed are inadequate. The airport should be required to compensate all residents local to the airport to at least the extent offered in the course of the Airports Commission's work in 2014. It should also be required to compensate all residents living under flight paths for loss of property value.

15. Consultation process

Question: For this consultation we have made details of our proposals available in a number of ways, including in hard copy documents, on our project website, in a virtual exhibition and by providing opportunities to speak to members of the team. We welcome your feedback on how you have found the consultation process. Please let us know if you have any comments about the consultation process.

Response

The consultation is not fit for purpose. It gives an erroneous and misleading impression of the need for the development, uses projections that are not consistent with the Airports National Policy Statement, contains material errors and omissions in its economic analysis (and so gives

a misleading impression of the benefits and costs of the proposed development) and misrepresents the noise impacts of the proposed development.

For these and other reasons we do not believe the consultation meets the requirements of the Planning Act and we consider that any application based on it should be rejected on the grounds of inadequate consultation.