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## The CAGNE response to CAP3012

**Communities Against Gatwick Noise Emissions (“CAGNE”) stated that prices should be increased to reflect the impact of aircraft noise, carbon emissions, greenhouse gases and light pollution.**

CAGNE reiterates that we believe the CAA are failing to understand or accept the impact such an airport has on the economics of the country as a whole or that of the world. It has been clear from the recent changes and the discussions by aviation bodies that seek to suggest they are ‘sustainable’ that aviation is far from being able to be seen as a green form of transport as such the CAA has a duty to include such costings going forward which it currently fails to do.

An airport may seek to illustrate activity on the ground to reduce CO2 and the like, but it is the fundamental reliance upon third parties that make these proposals by Gatwick unacceptable as they stand and the CAA conclusions. We therefore raise the following points and ask for them to be addressed by the CAA.

- 4.19 The DCO is not a given for a new runway at Gatwick as such the emphasis placed on this by the CAA (green 4.7) is unfounded and indeed is not correct in that it suggests economic stability and growth framework when it does not consider the financial cost of the carbon and non-CO2 costs from such a new runway (4.16). Gatwick’s own estimate of the environmental cost side of the equation to £5.1bn but resists the use of the DfT and BEIS-approved adjustment for non-CO2 emissions, surely the CAA cannot accept, or ignore such figures and stance without including it in forecasts?

In terms of the policy context, it must be borne in mind that the Government’s “*key objective on aviation emissions*” is to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions. The carbon cap would help to achieve that goal with respect to this Application

Gatwick offers growth in the form of new long-haul airlines, as they seek but never achieved in 2014. We offer this industry paper on how long-haul major emitters are and yet will continue to struggle to decarbonise.

<https://www.eurocontrol.int/publication/eurocontrol-think-paper-21-long-haul-flight-decarbonisation-when-can-cutting-edge>

- We do not believe a new runway will offer anything like the stability that the CAA is accepting (4.7 green) as indeed we see this causing more delays and holding due to airspace not being big enough; (4.12) ground crew, lack of workers and ATC; and facilities to handle such an increase in passenger numbers on surface access and at the airport itself.
- 3.65 As such we call upon the CAA to be consistent in including the carbon and non-greenhouse cost of leisure flights in economic papers such as this. Change of policy has increased cost for a new runway and for the airport but no mention is found of this. We offer one of the CAGNE submissions to the DCO addressing this matter. *Impact of the DfT TAG November 2023 update on the Applicant's National Economic Impact Assessment*  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020005/TR020005-003725-DL10 - New Economics Foundation - Any further information requested by the ExA under Rule 17 of The Infrastructure Planning Rules 2010.pdf>

We see no evidence that SAF (producer of same CO2 as fossil fuel when burned) or hydrogen will be in play any time before 2035.

- 3.69 – CAGNE would like to see long-haul aircraft charged a greater fee as they increase noise issues on departures and landing as well as ignoring the impact wheels down early has on the noise increases on the ground.
- We raise, yet again, that the funding that Gatwick offers to communities is a PR activity for the airport and does not actually go to those impacted day and night by noise. We see no reflection of this in the pricing schemes or in the CAA assessment. Policy requires shared benefits of airport growth and this is not illustrated currently or in this paper.
- 4.7 We call upon the CAA to include the modernisation of airspace (4.9) in the costings to residents as Gatwick continues to seek to increase flight paths and ATM to profit from additional slots sales and licences to the detrimental cost to homeowners.
- 3.73 We see no offering of downturn to the airports growth to reflect cost of living crisis (October budget, global warming, destinations and war) and increase in cost of flying due to alternative fuels to fossil fuel. Gatwick being the most impacted airport in Europe by COVID. 4.7 We do not believe Gatwick does not seek to charge airlines more for a new runway as such this should be reflected in the CAA comments and conclusions (amber).
- As detailed during the DCO hearing airlines are very concerned about the lack of terminal space (4.10) now as such we see no costings reflected in this document for a new terminal to accommodate a new runway nor the subsequent costs of on-site sewage treatment plants, roads, flood, re-instatement of nature, etc.
- 3.69 – Air quality is a major concern surrounding Gatwick as such CAGNE employed Air Quality Services to put forward responses to the DCO and lack

of acceptance by the airport of the ultra-fine particles that come directly from the airfield impacting residents and airfield workers. This has a cost (NHS) implication as air quality standards increase the airport should reflect on reducing movements if it is unable to decrease impacts on air quality from the airfield and roads. <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020005/TR020005-003069-DL8 - CAGNE - Appendix 2 - Air Quality WR.pdf>

Again, the CAA make little of this, in fact accept the poor details provided by the airport. There seems no cost reflection in the transportation or decline in air quality due to the movement of SAF and hydrogen to the airport by HGV movements as well as the desired freight with a new runway.

- 4.5 It should be in the consumer interests to be informed of the emissions released by flying and we refer to the current CAA consultation on this subject as a way forward to allowing the consumer to form an informed decision and reflect decisions on whether to fly or not or what airlines to select.

There should be a balanced approach as required by policy which the CAA are failing to demonstrate in this document. We see much of commercial-based growth at any price. This is simply unacceptable stance from a statutory body.

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