



Crawley Local Plan

<p>Ref No:</p> <p><i>Office use only</i></p>
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Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council.

Representations can be made via this form and emailed to strategic.planning@crawley.gov.uk or sent via post to: Local Plan Consultation, Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ. Alternatively, representations can be made online using the [eform](#) which allows attachments of documents.

This form has two parts:

PART A – Personal details

By law, representations cannot be made anonymously. All representations will be published alongside your name, company name (if applicable), and your client’s name/company (if applicable). The Council will use the information you submit to assist with formulating planning policy.

Further information about Data Protection Rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example, how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at www.crawley.gov.uk/privacy. Specific reference to the Local Plan and planning policy related public consultation can be found [here](#).

PART B – Your representation

Please fill in a separate sheet for each representation you wish to make. You may submit multiple “PART B” sections with a single “PART A” completed.

PART A – Personal details

Please ensure that you complete all fields in 1. If a planning agent is appointed, please enter the Title, Name and Organisation in 1, and complete the full contact details of the agent in 2.

	1. Personal details	2. Agent’s details
Title:	<input type="text"/>	<input type="text"/>
First name:	<input type="text"/>	<input type="text"/>
Surname:	<input type="text"/>	<input type="text"/>
Organisation:	<input type="text" value="CAGNE"/>	<input type="text"/>
Address line 1:	<input type="text"/>	<input type="text"/>

Address line 2:

Town/city:

Postcode:

Telephone:

Email:

PART B – Your representation

3. Please tick the document that you would like to make a representation on:

- Crawley submission Local Plan
- Crawley submission Local Plan Map
- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

4. Which part of the Local Plan does this representation relate to?

Paragraph: Policy: Other:

5. Do you consider the Local Plan to be: (Please tick)

- 5.1. Legally compliant? Yes No
- 5.2. Sound? Yes No
- 5.3. Compliant with the duty to co-operate? Yes No

6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

It is worded to facilitate a commercial organisation instead of seeking a green better future for Crawley. Aviation is one of the biggest polluters as such Crawley should be seeking to limit it via policy due to carbon emissions, small particles from the airfield, NOx and vapours produced by aircraft. As well as the new drop off charge pushing the pollution to other parts of Crawley away from the airport.

If required, please continue your response on an additional piece of paper and securely attach it to this response

7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.

Policy should be more stringent in opposing Gatwick's growth and greener industries should

be facilitated for employment. This policy is seeking more of the same which is not in keeping with consumer and government policy of net zero. Aviation will be burning fossil fuel for the next 30 years as such a major polluter therefore Crawley must accept these emissions as part of their policy and criteria to reduce emissions to meet net zero

If required, please continue your response on an additional piece of paper and securely attach it to this response

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.***

8. **If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)**

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

9. **If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:**

Crawley policy is not seeking to change to tackle climate change as such it is flawed and needs to be re-addressed. CBC cannot continue to be blinkered in supporting Gatwick's growth when it attracts more emissions to the area which are clearly against pledge to climate emergency. There needs to be joined up thinking within council policy over climate change and efforts to meet net zero.

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: www.crawley.gov.uk/localplanreview

Signature

[Redacted Signature]

Date

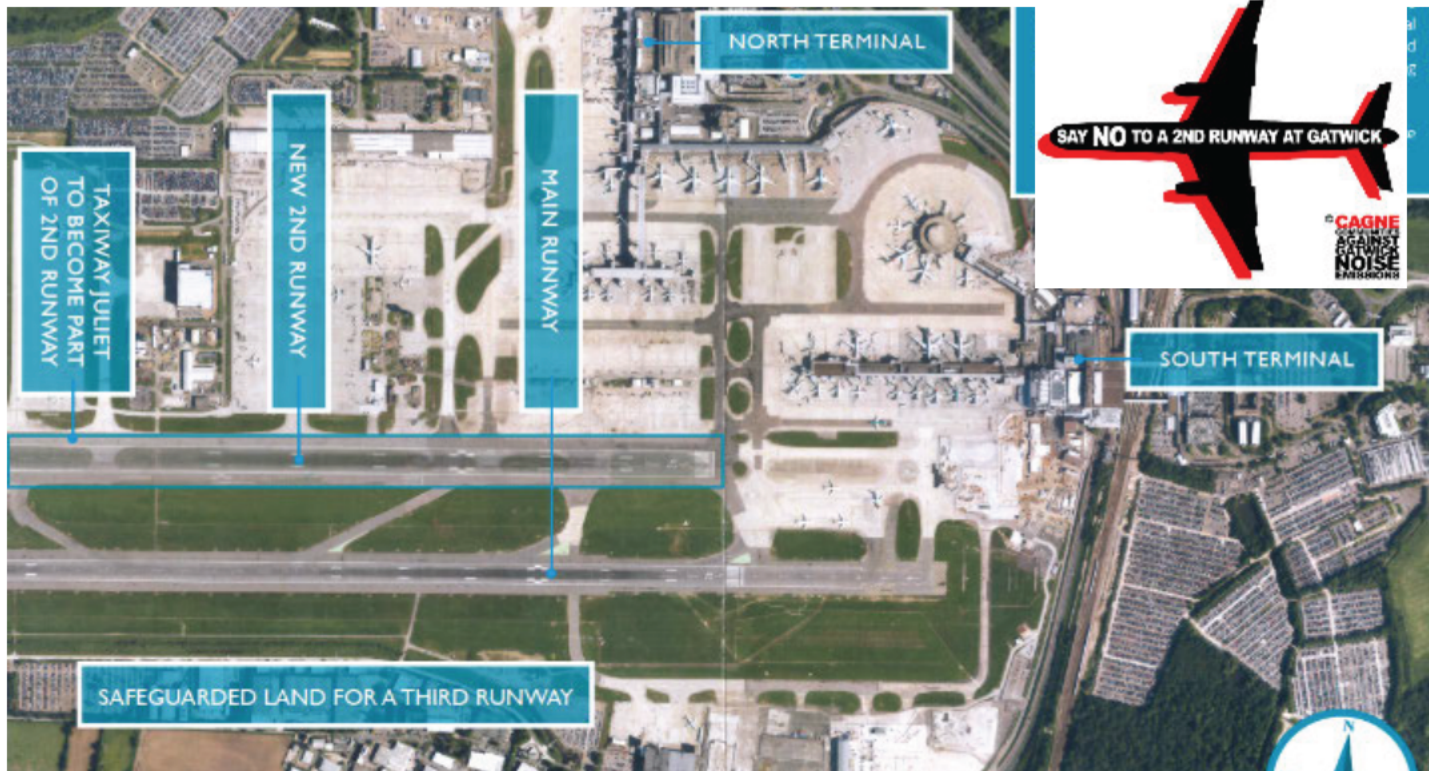
01/02/2021



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COMMUNITIES
AGAINST
GATWICK
NOISE
EMISSIONS

CAGNE

The umbrella aviation community and environment group
for Sussex, Surrey and Kent



The Gatwick Layout

- The boundary of Gatwick is tight for additional development.
- The emergency runway must be moved (rebuilt) by 12m to make it safe to use both runways in unison.
- This is why it is not in line with government policy '*making best use of current facilities*', as well as having to build new taxiways and traffic light system for aircraft crossing from the main runway due to safety.
- Plus car park, hotel, offices, freight-handling warehousing, etc.

The Gatwick Airport Master Plan in 2018 detailed a 3 runway airport



- **The emergency runway would be using the same flight paths as used today 24/7.** Any gaps in arrivals and departures will disappear due to Gatwick's predicted over 40% increase in the number of flights.
- Departing short-haul planes to the east and west flying north would use the emergency runway. Thus freeing up the main runway to accommodate more long-haul and short-haul departures, as well as all aircraft arrivals back into the UK.
- The simultaneous use of both the main and emergency runways at peak times would add 90 extra flights a day.. That's going from an annual aircraft movement of over 285,000 a year to 319,000.

To be clear, the Gatwick Airport Master Plan in 2018 stated 3 Runways.

This expansion is in addition to growth plans of Heathrow, Stansted, Bristol, etc.

- **ONE** – Main runway
- **TWO** – Rebuild the emergency runway as a second runway adding 34,000 flights a year at peak times
- **THREE** – Safeguard land for 3rd runway – this is now to be a temporary industrial site adding to road congestion
- At present Gatwick is only seeking to expand aircraft movements from two runways





Growth off the Main Runway

A criminal increase of flight movements, which equals a significant increase in passengers (and potentially freight) on our roads

- This will not be part of the Development Consent Order, unlike the emergency runway
- We believe 40% increase in aircraft movements will be predominantly from the main runway.
- The emergency runway (the new second runway) representing 34,000 increase in aircraft movements.
- Gatwick continues to borrow - £250m under the Bank of England COVID Corporate Financing Facility scheme with 12mths to repay from government with tax rebates of £8m and furloughed staff

Surface access



- **TRAVEL** – Using two runways will mean an extra 5m passengers on top of the 46.1m. If Gatwick go for 55,000 extra aircraft movements, that will add a further 3.2m passengers a year, a 52% increase.
- **Road** – The majority of passengers and workers arrive at Gatwick by road. M23 smart roads condemned as unsafe
- **Rail** – Network Rail is struggling with the natural growth in rail passengers now, even with the recent investment in stations. The line cannot be expanded due to physical restrictions, so no additional trains can be added, yet Gatwick's proposed expansion would add millions of passengers a year to the Brighton line.
- **AMENITIES** – Green land will go - There is already a shortage of affordable housing, health care and school places. Employment opportunities are a false economy when aviation is a key polluter.



Environmental and Health

- **CLIMATE EMERGENCY** – More planes equate to more damage to the planet. The carbon emissions from Gatwick Airport go from 0.77MtCO₂ in 2017 to 0.95MtCO₂ in 2028, with the 2nd runway adding between 618,000tCO₂ to nearly 1MtCO₂* by 2050. This does not include NO_x and vapours which are major contributors to global warming.
- **HEALTH** – What about our air quality? Little attention is being paid to air quality in our area. Dangerous small particles come from the airfield that cause serious health problems. Recent study shows a 5% increase in particulate matter pollution (PM2.5) was associated with 9,700 additional premature deaths across the United States* - the increased use of natural gas in households, industries and **growth in the number of miles travelled in fossil-fuel-powered vehicles** likely contributed to the rise in PM2.5 in certain areas

Environmental concerns



- Gatwick's master plan flies in the face of Climate Change, as aviation is one of the biggest threats our planet faces today, contributing to 5% carbon emission globally as it burns fossil fuel. New environmentally-friendly planes are decades away from being a reality.
- New planes and the modernisation of airspace may reduce CO₂ and other emissions but if you are adding more and more planes to the sky you are removing any savings made.
- Aviation is a top ten global polluter and emissions are set to balloon by 300% if action isn't taken sooner rather than later. Illogically, aviation and shipping were excluded from the Paris Agreement. In the UK, aviation CO₂ emissions are expected to use up more than two-thirds of the UK's carbon budget by 2050.
- "The Committee on Climate Change's advice should represent a line in the sand when it comes to airport expansion. To deliver a net zero economy we need investment in sustainable transport, new systems of home heating, and carbon removal technologies, all of which can create green jobs for the long term. Airport expansion runs directly counter to the net zero agenda. It has to stop," said Aviation Environment Federation.

Is there a Climate Emergency?

- Yes, NOx and vapours from planes that cause greater harm to global warming are not being tackled by the industry.
- **Too Many Companies Are Banking on Carbon Capture to Reach Net Zero** - There's only so much land available to plant new trees, and most other methods are expensive and difficult.
- Productions of aviation biofuel will likely need to be in conjunction with carbon capture and storage (CCS) to be competitive, with competing uses for biomass (e.g. in industry, electricity generation, or hydrogen production) and food. Electric batteries continue to use up the planet's resources and serious questions have to be asked to how the batteries will be disposed of in the future. Don't expect to see commercial electric planes for over 30 years.



Is there a Climate Emergency? (cont)



- UK aviation accounts for 2.5% of carbon emissions and 5% internationally.*
- Zero emissions would mean no production of any emissions from any sector. However, there are some sectors, such as farming, shipping and **aviation**, where this is **not anticipated to be possible***
- Aviation has to be seen as a luxury industry, subsidised by all as it continues to pay no VAT or duty.
- There needs to be a change in consumer attitude towards flying. Our **Pledge to Fly Less** campaign seeks to educate flyers to the damage they are creating for future generations.

Economics



- Airport expansion is a false economy and non-sustainable one as it is reliant upon a leisure industry that is dependant upon consumer spend and confidence.
- Chief Executive of Coast to Capital LEP said* on his thoughts about the region's economic reliance on Gatwick – ***'In my opinion we have historically relied too much on Gatwick'*** (January 2021).
- Gatwick is owned by France's VINCI Airports and \$71bn fund GIP; it still has the option of accessing a further £50m under its £300m CCF facility. With pre-tax loss for 6 months to June 2020 of £344m*.
- Gatwick Diamond estimating a further 37,000 new jobs created from new business parks on top to Gatwick 2 placing unprecedented pressure on an already inadequate road system with further decline in air quality.
- Gatwick Airport, pre COVID, planned reduction in jobs with automation of baggage, car parking, security, check-in and cleaning of planes
- Local businesses have to compete with Gatwick Airport when recruiting and retaining staff – an inflationary and inefficient situation ... and expansion would exacerbate the situation.

Economics (continued)

- Business travel is now just 9% of UK residents' flights (pre COVID) versus 18% in 1997, but Gatwick is a leisure airport flying to over 80% of flights to Europe (Brexit, value of Euro)
- Green sustainable jobs have to be the future for sustainability. New aviation technology and fuel is not going to happen for at least another 30 years.
- The level of expansion that Gatwick proposes would result in a dramatically unbalanced economy and bring even heavier reliance on the prosperity of the airport to the region – a very unhealthy and risky position for the area.



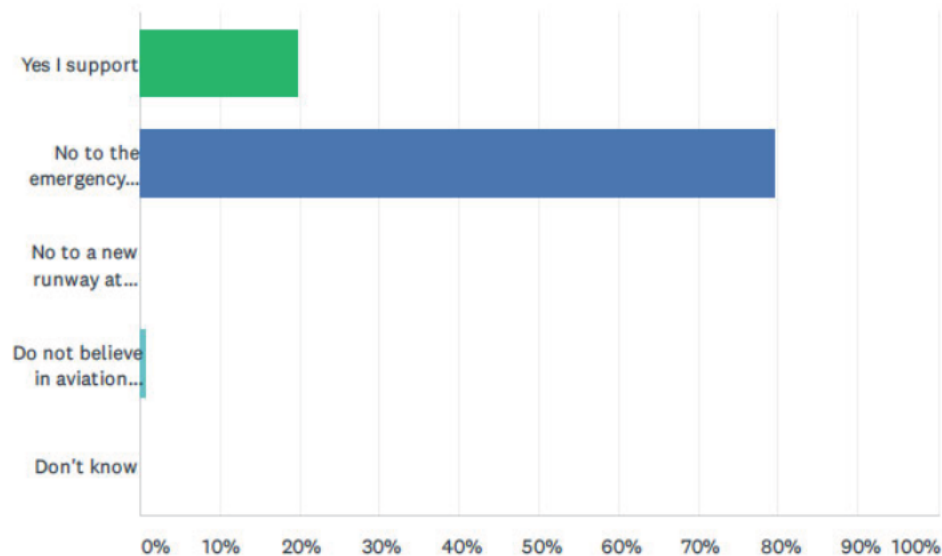
Two surveys show Gatwick's plan is not supported



- One local to Gatwick and one nationally, nearly 80% in both said NO to Gatwick expansion plans

Q9 Do you support Gatwick Airport's plans to rebuild the emergency runway as a second runway which will increase the number of flights?

Answered: 302 Skipped: 11



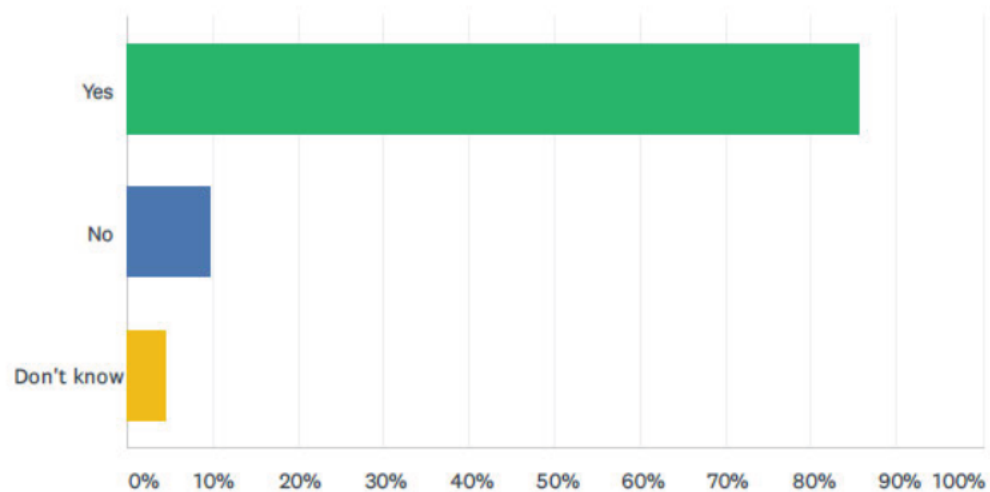


Consumer concern

- Over 85% of those asked nationally

Q10 Do you believe aviation is causing problems for global warming?

Answered: 298 Skipped: 15



Could you fly less to cut emissions?



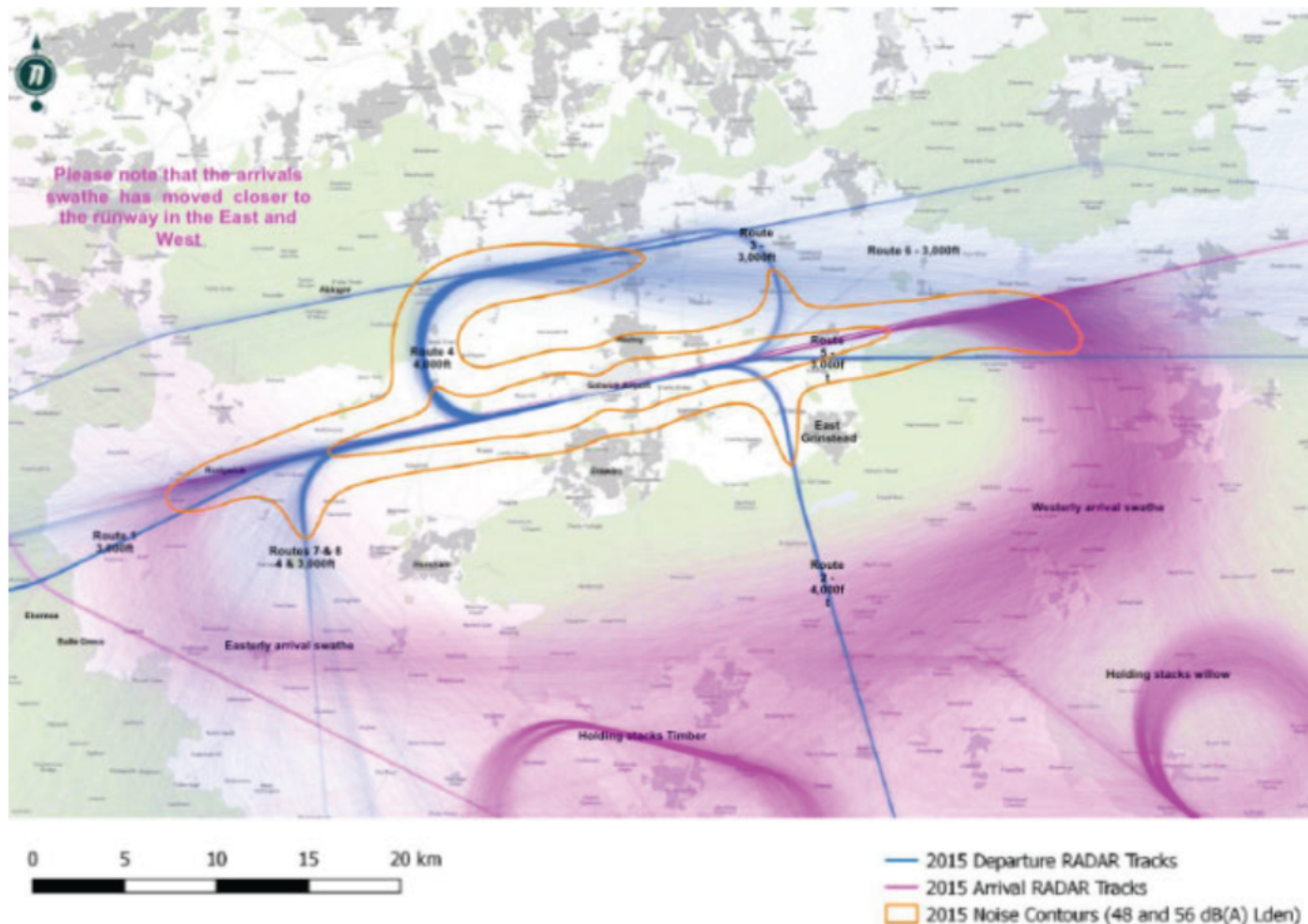
September 2019 Survey by New Scientist found:

- Most people (66.9%) in the UK back limits on flying to tackle Climate Change
- 28.2% said air travel should definitely be limited, with
- 38.7% saying it should probably be restricted.
- Just 22.2% felt there was no need for limits
- and 10.8% said they did not know!

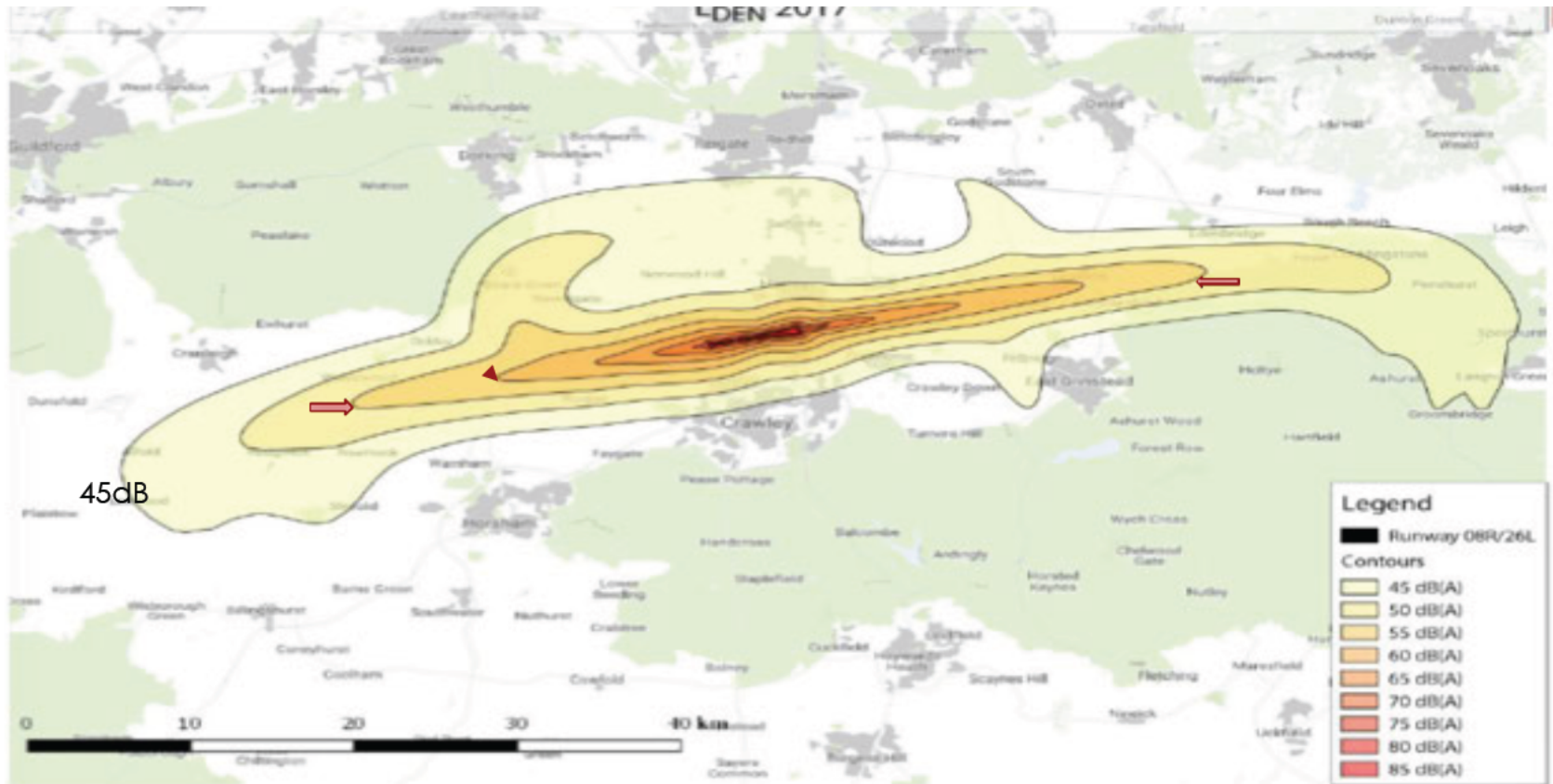
Aviation is a luxury industry - 70% of UK flights are made by a wealthy ABC1, 15% of the population, with 57% not flying abroad at all.

Flight paths today – departures and arrivals – More noise for all

2020 National survey showed that over 84% felt anger, sadness, helpless to aircraft noise



45dB Noise Contour, as below, that is not considered by the Plan or Government and yet Gatwick already detail areas far outside of the recognised noise contour of 57dBA Leq day



An additional 90,000 flights a year by 2032 with two runways

(ATM aircraft movements)



FIGURE 5.5: GATWICK GROWTH WITH STANDBY RUNWAY

	2017/18 ACTUAL	2018/19	2019/20	2020/21	2021/22	2022/23	2027/28	2032/33
Passengers (m)	45.7	47.1	49.1	50.6	52.0	52.8	65 – 67	68 – 70
ATMs	280,790	284,270	289,770	294,490	297,670	300,000	360,000 – 365,000	375,000 – 390,000
Passengers per ATM	162.7	165.7	169.4	172.0	174.7	176.0	Around 180	Around 180

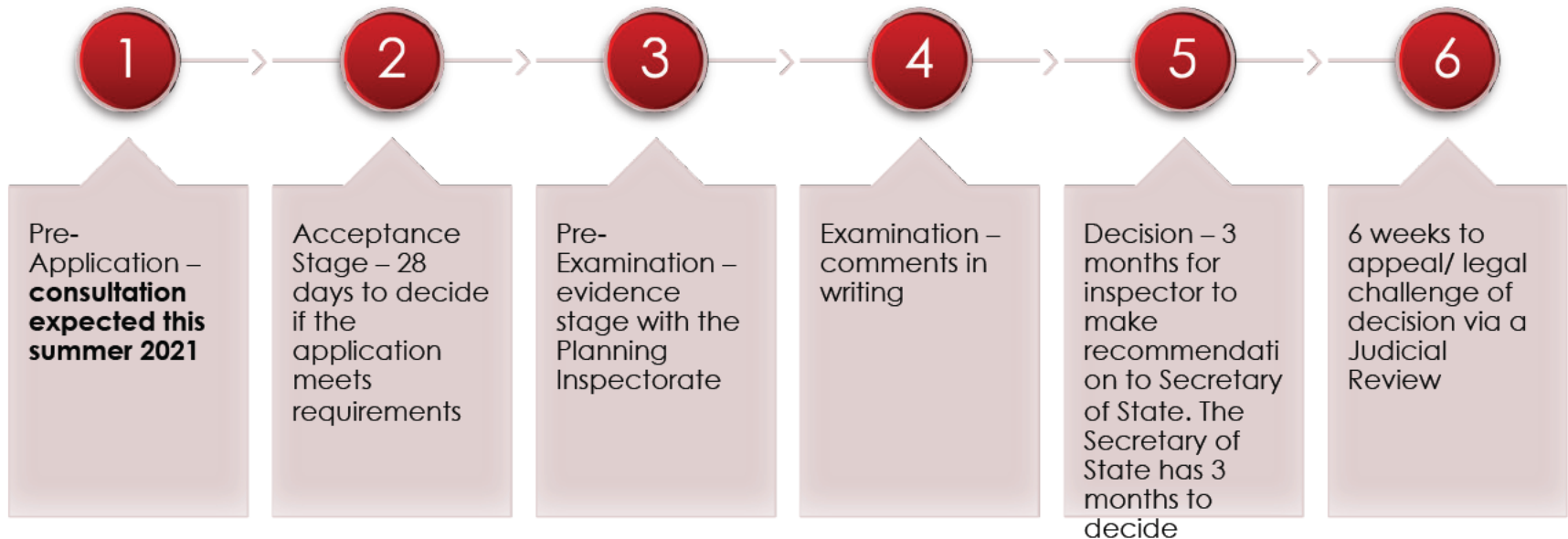
Gatwick is using the planning process called 'Development Consent Order' (DCO) and Government policy '*making best use of current facilities*'



The planning process

- Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008.
- GAL has applied for a Development Consent Order (DCO) to get planning permission. NSIP applications are examined by the Planning Inspectorate and finally decided by the Secretary of State.

Six stages of DCO



Q & A

- Do you have any questions?
- Your Action is needed -
- www.cagne.org

Donations are needed to Stop Gatwick Expansion plans for evidence documents and barristers

Don't elect a council candidate if they support Gatwick expansion plans

- www.cagnepcforum.org.uk

The CAGNE Aviation Town and Parish Council Forum with 30 members to the north, south, east and west.

- www.pledgetoflyless.org.uk

Endeavouring to educate the consumer to the damage flying is doing to the planet

